

Consultation Statement

Developing the Core Strategy Submission Document – the role of Community Involvement and Stakeholder Engagement

This statement satisfies the requirements of Regulation 30 (1) (d), (e) and (f) of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008

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(NB Some representations did not refer to soundness or legal compliance, copies of these representations are available separately. Similarly, original copies of additional supporting evidence are also available to view)

Introduction

The development of the Rochford District Core Strategy has been an iterative process subject to a number of stages. The results of community involvement and stakeholder consultation at various junctures have played a significant role in developing the Core Strategy.

This document sets out, for each juncture in the production of the Core Strategy: the methods the Council employed to ensure community involvement; groups, organisations and bodies invited to make representation; a summary of the main issues raised; and how representations have influenced the plan-making process. It should be noted that this statement does not contain the detailed content of all the representations, but copies of all the representations are available on request.

There were four key stages at which representations were invited on Rochford's Core Strategy: Issues and Options (September 2006); Preferred Options (May 2007); and Revised Preferred Options (October 2008); and Submission (September 2009).

Rochford District Council has an adopted Statement of Community Involvement. This sets out how the Council will involve the local community in the preparation of the Local Development Framework. Since the adoption of the Statement Community Involvement new regulations¹ have come into force which have amended the consultation requirements for Local Development Documents, including the stages at which consultation is undertaken.

Such new regulations came into force midway through the production of the Core Strategy. As such, the Council have had regard to both the adopted Statement of Community Involvement and, where applicable, the new regulations.

In addition to that undertaken specifically on the Core Strategy, it is important to note that community involvement and consultation on various elements of the evidence base and other strategies which have influenced the Core Strategy has also taken place.

¹ The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008

Issues and Options

Rochford District Council produced its Core Strategy Issues and Options document in September 2006.

The Council engaged the community and other stakeholders through the actions set out in Table 1 below.

Table 1 – Encouraging public participation in Issues and Options

Event / method of consultation	Details
Public exhibitions / meetings	<p>Manned public exhibitions were staged in the following locations across the District, at various times, including at weekends, to maximise opportunities for people to attend:</p> <ul style="list-style-type: none"> • Canewdon Village Hall; • Clements Hall Leisure Centre, Hawkwell; • Ferry Road Car Park, Hullbridge; • Great Wakering Village Hall; • Hawkwell Village Hall; • Rayleigh High Street; • Rawreth Village Hall. <p>Exhibition material was also displayed at Rochford Council Offices, along with access to Officer advice during office hours.</p>
School workshops	<p>Secondary schools in the District were invited to partake in workshops on the Issues and Options. Workshops were held in King Edmund School, Rochford and Greensward Academy, Hockley. The results of these workshops is a published part of the LDF evidence base.</p>
Consultation letters to stakeholders	<p>Letter to key stakeholders, including all relevant bodies listed within Appendix E of the 2004 PPS12 (which has since been superseded by revised PPS12)</p>
Rochford District Matters – article and questionnaire	<p>Article and questionnaire contained within the Council's free newsletter which is distributed to nearly all households in the District.</p>
Press release	<p>Issued to local media</p>
Online questionnaire and information	<p>Available on the Council's website</p>
Posters	<p>A number of posters were displayed in various locations throughout the District, promoting the opportunity to participate in the plan-making process.</p>

The Council also made details of other independent sources of planning information, such as Planning Aid, available.

Summary of main issues raised during Issues and Options consultation

A summary of the main issues raised during Issues and Options consultation was presented to the Planning Policy and Transportation Sub-Committee on 15th February 2007. 370 representations were received. In addition, material produced at school workshops was drawn upon in analysing the response to the Issues and Options. The main issues raised under vis-à-vis the following themes are described below.

HOUSING

The general feeling is that there is already enough housing and that some settlements are full. Strong feeling that the green belt should not be built on. Common response is to develop brownfield sites in existing settlements. The option of providing a new settlement was largely rejected. No clear preference as to which settlements should take new housing and which should not. There is a need to improve infrastructure.

AFFORDABLE HOUSING

The general feeling is that more affordable housing is needed for local people. Strong feeling that too much expensive housing has been built over recent years. Housing for key workers also considered an issue, but difficulty in defining who is a key worker. Strong feeling that affordable housing must be available only to those who need it.

JOBS

The general feeling is that existing employment land is poor quality and needs updating. New employment land needs to be accessible and to have an attractive design. There is a need to improve infrastructure. Strong feeling that there should be no land released from the green belt, but instead that existing land should be redeveloped.

PROTECTION

The general feeling is that existing green belt, parks and countryside should be protected and that there should be better access to these areas, particularly on foot, bike or horse. Strong feeling that the Roach Valley and Hockley Woods are important, together with the Rivers Roach and Crouch. Need to enhance and advertise the green spaces. There was a feeling that the Council had done a good job in recent years to protect the district.

CHARACTER

The general feeling is the district does have a distinct character, although this is good in Rochford and poor in Rayleigh. There is a strong feeling that landscaping and design are vital in the planning process. There was a feeling that the Council had done a good job in recent years to ensure the retention of the character of district, but that it should not over-focus on this. The idea of bringing back the local list was supported.

ENERGY & WATER

The general feeling is that there is a strong need for work to ensure that energy and water use is reduced and that opportunities are taken now to provide for the use of renewable energy sources and the recycling of water. There was a strong feeling that high standards have to be incorporated in new buildings, including water butts and solar panels. There was a feeling that large scale wind energy schemes should be offshore.

LEISURE, TOURISM & COMMUNITY FACILITIES

The general feeling is that facilities are about right, as there is no infrastructure to support extra facilities. There was a feeling that there should be more for youths to do in the evenings and that there was a need for a swimming pool in Rayleigh. There was a strong feeling that there is a lack of medical and dental facilities. There was a feeling that more use should be made of the rivers and their banks.

COMPULSORY PURCHASE & PLANNING OBLIGATIONS

There was a strong feeling that money raised from development should be spent locally and to resolve existing issues. There was a strong feeling that the approach put forward by the Council was reasonable. There was a feeling that compulsory purchase should be used as a last resort and not for road building.

How issues raised at Issues and Options stage were addressed

Issues raised at the Issues and Options consultation stage were incorporated into the production of the development of the next iteration of the Core Strategy – the Preferred Options. The key elements were reported to the Planning Policy Sub-Committee on 22nd March 2007, as follows:

- Inclusion of energy and water conservation as policy areas.
- Statement of the Council's preferred options for strategy gaps between settlements and the continuation of a restrictive policy framework for development in the green belt subject to relaxations for major developed sites, green tourism and renewable energy.

- Consultation responses confirmed the importance attached to the protection of the Upper Roach Valley, and this was reflected in the Preferred Options.
- Preferred options for protecting the Upper Roach Valley and developing the Cherry Orchard Jubilee Country Park.
- Preferred options specified for protecting the undeveloped coastline, special landscape areas, historic landscape and ancient woodlands and the development of policies to support and enhance biodiversity.
- Preferred Options includes comments on the relocation of bad neighbour sites and examination of the reuse of industrial sites for residential development.
- The preferred options for housing numbers and phasing were specified. An important element of housing provision is an analysis of the potential to use previously developed land in line with national guidance.
- Housing distribution based on tiers of settlement, with larger proportion to higher tier settlements.
- Proposed that the affordable housing target for the district be 30% of houses on sites of 10 units or greater.
- Preferred options include reference to a policy for the provision of health care facilities.
- Preferred options for energy and water conservation include reference to carbon neutral development.
- Preferred options in relation to lifetime homes, sustainable homes and the requirement for health impact assessments.

Preferred Options

In June and July 2007, the draft Core Strategy was subjected to 6 weeks of consultation.

The Council engaged the community and other stakeholders through the actions set out in Table 2 below.

Table 2 – Encouraging public participation in Preferred Options

Event / method of consultation	Details
Public exhibitions / meetings	<p>Manned public exhibitions were staged in the following locations across the District, at various times, including at weekends and evenings:</p> <ul style="list-style-type: none"> • Ashingdon Memorial Hall • Canewdon Village Hall • Great Wakering Memorial Hall • Hockley Parish Hall • Hawkwell Village Hall • Hullbridge Parish Council Offices • Rochford WI Hall

	<ul style="list-style-type: none"> • Rawreth Village Hall • Rayleigh High Street • Rayleigh Windmill
Consultation letters to stakeholders / members of the public	<p>Letters / emails to key stakeholders, including all relevant bodies listed within Appendix E of the 2004 PPS12 (which has since been superseded by revised PPS12).</p> <p>Those on the Council's Local Development Framework mailing list – which comprises statutory consultees along with groups and organisations who may have interest in the development of the District, and members of the public who have requested to be kept updated with opportunities to participate – were written to informing them of the consultation period and encouraging them to submit views using the online system. Groups written to inviting comment included those representing sections of the society who have traditionally been underrepresented in the planning process. Mindful that the over-reliance on electronic communication may exclude some sections of society, the opportunity to comment via written correspondence was also made available.</p>
Rochford District Matters	Summary of the Core Strategy Preferred Options, together with information on how to comment was included within the free newsletter issued to most dwellings in the District.
Press release	Notices were published in local papers and a press release was issued via the Council's Corporate Communications Officer.
Online consultation system	The Council utilised its new online consultation system for consultation on the Core Strategy Preferred Options. The system allows respondents to submit and view comments online. A link to the system was placed on the main page of the Council's website, along with a rolling banner promoting the opportunity to participate.
Posters	Posters were displayed in a number of premises across the District, advertising the Core Strategy consultation and the public exhibitions in particular.

Summary of main issues raised during Preferred Options consultation

A total of 793 representations were submitted by 443 groups, organisations and members of the public. Details of all representations received are available to view online via the Council's consultation system and in paper format on request.

In addition to the representations received a petition with 328 signatures was submitted at the Hullbridge public exhibition. The petition stated "Please all support your village, sign below if you are opposed to the amount of building houses/flats in our village. We need more shops for the village."

The issue that by far and away elicited the most responses was that of the location and numbers of new housing. 459 representations related to this issue, 327 of which were objections, 114 comments and 18 in support. A large proportion of representations on this section were people objecting to additional development in their area of residence, the majority of which were objections to the allocation for Rayleigh, or respondents promoting development on particular sites.

The main issues raised by members of the public were as follows:

- There is too much residential development proposed for the settlement in which the respondent resides;
- There is no need for additional housing in the District;
- It is not clear where new development is proposed to go;
- Green Belt land should not be developed;
- Residential intensification is unwelcome;
- There is not enough infrastructure to support more housing;
- Roads are too congested;
- The District's green, open spaces are popular;
- Antisocial behaviour is a concern;
- There needs to be more for young people to do;
- Any new accommodation should be affordable;
- The District's character is liked. The historic character, in particular, needs to be protected;
- Local shops are popular;
- More village shops are needed;
- Community spirit is strong in the District's settlements;
- New development should be environmentally friendly.

Representations from both members of the public, statutory bodies and other organisations expressed concern regarding the lack of detail as to where new development will be located, the quality of the evidence base used to arrive at the preferred options, and the impact on infrastructure from new development.

When the drafting of the Core Strategy Preferred Options was originally undertaken, guidance inferred that the Core Strategy should not deal with specific development locations – this being left for the Allocations Development Plan Document – but should instead deal with broad issues and set out the Council’s general approach to future development. However, responses from statutory consultees, including GO East, suggest that more detail is required at the Core Strategy Preferred Options stage than was provided in the Council’s draft.

How issues raised at Preferred Options stage were addressed

Having regard to the results of the consultation carried out on the Core Strategy Preferred Options, the Council resolved to revisit the Preferred Options stage and produce a revised Core Strategy Preferred Options document providing greater detail on general locations for development and empirical evidence to support the preferred options.

This resulted in the development of an improved evidence base and the production of a revised Core Strategy Preferred Options document which set out general locations and quantum in more detail. This revised Core Strategy also set out, within its introduction, how the views submitted by members of the public on the original Preferred Options document had been addressed, in the form of the following table:

Table 3 – Extract from Core Strategy Revised Preferred Options (2008) setting out how views submitted in response to previous iterations of the Core Strategy had been addressed

What you told us previously	What we have done this time
There is too much residential development proposed for our village / town.	We have reconsidered the issue of housing distribution having regard to the updated evidence base together with the implementation of other new strategies / developments since last year.

What you told us previously	What we have done this time
<p>Why do we need to accommodate any more houses in the District?</p>	<p>The East of England Plan requires Rochford District to ensure at least 4,600 additional dwellings are built in the District between 2001 and 2021.</p> <p>Rochford's allocation is based on meeting current and future need.</p> <p>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 unable to do so (e.g. adult children).</p> <p>Projected need is derived from the supposition that the population is projected to increase from 81,300 in 2007 to 87,000 by 2021.</p>
<p>It is not clear where new development is proposed to go.</p>	<p>The purpose of the Core Strategy is not to identify specific locations but indicate general areas for development. More precise locations, submitted as part of our 'call for sites' exercise, will be appraised within the Allocations Development Plan Document.</p>
<p>Green Belt land should not be developed.</p>	<p>We strongly support the protection of the Green Belt. However, there are insufficient Brownfield sites within the District to meet projected housing needs, therefore some Green Belt land will need to be released.</p>
<p>Intensification of existing residential areas (e.g. replacing one house with many, within the same space) is unpopular.</p>	<p>We recognise this concern and propose, as far as practicable, to limit the intensification of existing residential areas, preventing redevelopment which is not in keeping with the density or character of the area.</p>
<p>There is not enough infrastructure to support more housing.</p>	<p>We recognise the need to provide additional infrastructure and improve existing infrastructure where necessary. The Core Strategy outlines in broad terms what infrastructure will be required and how this will be delivered.</p>

What you told us previously	What we have done this time
Our roads are too congested.	In determining areas of future development, the fact that accessibility to public transport and the reliance on the use of the car is unequally distributed across the District has been taken into consideration. Actions to promote alternatives to the car such as walking and cycling are proposed.
We like the District's green, open spaces.	Green spaces within urban areas are part of the social fabric of the community and will be protected. The District itself is predominantly rural and we aim to minimise the development of Green Belt land. Where the release of Green Belt land is unavoidable, Green Belt land which contributes least towards the purposes of the Green Belt will be favoured for development over other Green Belt locations.
We are concerned about anti-social behaviour.	Anti-social behaviour is a complex issue but we recognise that planning has an important role to play. From the design of new developments to ensure that natural surveillance deters anti-social behaviour, to the redevelopment of
We are concerned about anti-social behaviour (continued)	Rochford and Hockley town centres incorporating more community and youth facilities, to providing environments that all of the community can take pride in and ownership of, concerns regarding anti-social behaviour have been incorporated.
There needs to be more for young people to do.	We propose additional youth facilities. Young people will be consulted on what facilities they require, and their views will be incorporated into the development of these facilities where a need has been identified.
Any new accommodation should be affordable.	We propose that a proportion of housing provided within new residential development is affordable housing - housing that is available to buy or rent below the normal market value. It is, however, not feasible to require developers to provide 100% affordable housing on any one site.

What you told us previously	What we have done this time
We like the character of the District. The historic character, in particular, needs to be protected.	We are committed to the preservation of the District's historic towns and villages. Provisions such as the extension of certain Conservation Areas and the reintroduction of a Local List of important buildings aim to prevent insensitive alterations to important areas.
We like our local shops / our village needs more shops.	We will support the development and preservation of shops within villages which serve everyday needs. The main focus of retail enhancement will be within Rayleigh, Hockley and Rochford town centres.
There is a good community spirit in our town / village.	'Sustainability' is the key vision for the future. To achieve this, it is essential that settlements are developed as necessary to maintain a vibrant and prosperous environment for future generations. We recognise the importance of community and this has been considered in all aspects of the Core Strategy, from the proposed housing distribution, to retail and town centre policies, to the proposed community facilities and leisure policies.
New development should be environmentally friendly.	We propose to require high environmental standards from new developments. Proposed policies within the Core Strategy address this, for example by requiring developments to meet certain standards of the Code for Sustainable Homes.

Revised Preferred Options

In October 2008 the Council published the Core Strategy Revised Preferred Options. The Core Strategy Preferred Options was subject to consultation and community involvement between 5 November and 17 December 2008.

The Council engaged the community and other stakeholders through the actions set out in Table 4 below.

Table 4 – Encouraging public participation in Revised Preferred Options

Event / method of consultation	Details
Public exhibitions	<p>Unmanned public exhibitions were staged in the following locations across the District, for the duration of the consultation period:</p> <ul style="list-style-type: none"> • Great Wakering Community Centre • Canewdon Village Hall entrance • Hockley Old Fire Station • Rochford main Council Offices • Hawkwell Clements Hall leisure centre • Hullbridge library • Rayleigh leisure centre
Public meeting	<p>Public meetings were held at the following locations during the consultation period:</p> <ul style="list-style-type: none"> • Hawkwell Village Hall; • Rochford Primary & Nursery School, Ashingdon Road, Rochford; • Edward Francis Junior School, Rayleigh <p>The meetings were held in the evening. A presentation was given explaining the Core Strategy Preferred Options document and how to submit comments on the document. This was followed by a session where attendees had the opportunity to ask Officers and Members questions on the proposals.</p>
School workshops	<p>Secondary schools in the District were invited to partake in workshops to obtain the views of students on the Revised Preferred Options. Workshops were held at Fitzwimarc School, Rayleigh; Greensward Academy, Hockley; and Kind Edmund School, Rochford. Pupils at Greensward Academy were also encouraged to express their views in an innovative manner and produced video diaries of their town, which showed their views on Hockley and how they used spaces within the area, which places were important, what issues they encountered on a daily basis etc.</p>

Commuter consultation	Officers issued leaflets outside of the District's three train stations during rush-hour. The leaflets provided an explanation of what the Core Strategy Preferred Options was and how representations could be made.
Consultation letters to stakeholders / members of the public	<p>Those on the Council's Local Development Framework mailing list – which comprises statutory consultees along with groups and organisations who may have interest in the development of the District, and members of the public who have requested to be kept updated with opportunities to participate – were written to informing them of the consultation period and encouraging them to submit views using the online system. Groups written to inviting comment included those representing sections of the society who have traditionally been underrepresented in the planning process. Mindful that the over-reliance on electronic communication may exclude some sections of society, the opportunity to comment via written correspondence was also made available.</p> <p>Specific consultation bodies were consulted by letter or email. A list of the specific consultation bodies consultation is attached as Appendix 1.</p>
Rochford District Matters	Summary of the Core Strategy Revised Preferred Options, together with information on how to comment was included within the free newsletter issued to most dwellings in the District.
Press release	Press release was issued via the Council's Corporate Communications Officer.
Online consultation system	The Council utilised its new online consultation system for consultation on the Core Strategy Preferred Options. The system allowed respondents to submit and view comments online. A link to the system was placed on the main page of the Council's website, along with a rolling banner promoting the opportunity to participate.
Posters	Multiple, location-specific designs explaining sources of information at various locations across the District.

Summary of main issues raised during Revised Preferred Options consultation

A total of 1331 representations were formally submitted from 417 respondents.

The issue of housing elicited the most responses. The majority of representations were objections by members of the public to the principle of further residential development in their area and the district generally. There was spatial variance in such objections, with a greater level of response to development in South Hawkwell and Land North of London Road, and fewer representations in respect of other general development locations.

Whilst the details of representations varied recurring themes were identifiable, including concern with regard to the need for improvements to infrastructure (particularly roads), the loss of Green Belt land and the impact on character of place and community.

A number of alternative housing development locations were suggested, particularly in respect of Rayleigh, where the suggestion of dispersing the development to smaller sites, including to the east of the town, was made. Conversely, other representations expressed concern that residential development was being too thinly spread through too many smaller sites, making the implementation of new infrastructure unviable. There was no real consensus on how housing should be distributed. The development of a new settlement was suggested in order to meet the District's housing requirements.

Some representations suggested that the Urban Capacity Study 2007 underestimated the capacity of previously developed land, with agents suggesting that the development quantum of specific sites could be increased.

The East of England Regional Assembly consultation response stated that there were no major conformity issues between the Core Strategy Revised Preferred Options and the East of England Plan.

A number of submissions reminded the Council of the need to ensure that the Core Strategy is deliverable, particularly in relation to economic viability.

A more detailed summary of the representations received are outlined in Appendix 2.

How issues raised at Revised Preferred Options stage were addressed

The results of the consultation on the Revised Preferred Options were presented to the Local Development Framework Sub-Committee on 9th February 2009. This included the summary of representation attached to this report as Appendix 2. Results of the school workshops were also presented to Members of the Local Development Framework Sub-Committee.

It was resolved at the Local Development Framework Sub-Committee on 9th February 2009 that:

- a) That a District-wide tour for Members, encompassing all potential development locations, be organised and undertaken to assist Members in consideration of the Submission version of the Core Strategy.
- b) That further meetings of the Sub-Committee be arranged to consider the contents of the Submission version of the Rochford Core Strategy.

A summary of some of the most significant changes resulting from responses to the Core Strategy Revised Preferred Options are listed below by theme.

Housing

The Council undertook further work on identifying additional sources of deliverable, housing supply within existing settlements, seeking to reduce the need for Green Belt release. This resulted in amendments to the Housing preferred options, with the removal of some Green Belt general locations and the insertion of strategic brownfield sites.

The development of a new settlement was not considered a viable option. A new settlement had been considered as part of the Core Strategy Issues and Options, but following consultation and appraisal, it was ascertained that such an approach would be unsustainable, unviable and undeliverable.

In response to concerns about congestion, the Core Strategy Submission Document includes additional travel plan requirements for developments, as well as identifying specific highway improvements. The Council has also resolved to produce a Transport Strategy Supplementary Planning Document which will address the issue in detail.

Following concerns expressed with regards to general infrastructure provision, the infrastructure requirements set out in the Core Strategy were revisited in conjunction with Essex County Council.

The phasing of development has been amended to account for concerns expressed at Revised Preferred Options stage vis-à-vis deliverability and viability.

Requirement for a new healthcare facility to be incorporated within the development of land to the north of London Road, Rayleigh has been dropped

following concerns that this location was too far from the town centre for such a facility.

Character of Place

Policy on the protection of the sites of historical and archaeological importance has been incorporated into the Revised Preferred Options policy on natural landscape and habitats, following concerns that this issue had not been addressed.

Environmental Issues

Policy on flood risk has been amended to account for Environment Agency's suggestion that the Core Strategy should seek to capitalize on opportunities to make space for water wherever possible.

Policies on Code for Sustainable Homes and BREEAM standards have been amended to take into account concerns re viability and deliverability.

Wording to the policy on large scale renewable energy projects has been altered so that it is more positive, addressing concerns that the text in the Revised Preferred Options was too negative.

Community Infrastructure, Leisure and Tourism

Policies on education provision include greater emphasis on early years and childcare facilities having regard to comments from Essex County Council School Organisation & Planning.

Policy on Rayleigh Town Centre in Core Strategy Submission Document includes exploration of potential locations for a healthcare centre in the town centre.

A threshold for Health Impact Assessments for new development has been included within policy.

Economic Development

Economic development policies have been amended to account for the importance of SMEs and developing adult skills. Specific employment allocations to be reviewed have been identified in the Core Strategy.

Implementation, Delivery and Monitoring

This section has been greatly expanded upon.

Pre-submission consultation

Rochford District Council published its Core Strategy Submission Document in September 2009 and it was subject to pre-submission consultation from 21st September to 2nd November 2009.

The Council consulted the community and other stakeholders through the actions set out in Table 5 below.

Table 5 – Consultation methods at pre-submission stage

Method of consultation	Details
Consultation letters to stakeholders / members of the public	<p>Letters / emails to key stakeholders, including all relevant bodies listed within Appendix E of the 2004 PPS12 (which has since been superseded by revised PPS12).</p> <p>Those on the Council's Local Development Framework mailing list – which comprises statutory consultees along with groups and organisations who may have interest in the development of the District, and members of the public who have requested to be kept updated with opportunities to participate – were written to informing them of the consultation period and encouraging them to submit views using the online system. Groups written to inviting comment included those representing sections of the society who have traditionally been underrepresented in the planning process. Mindful that the over-reliance on electronic communication may exclude some sections of society, the opportunity to comment via written correspondence was also made available.</p>
Rochford District Matters	An article on the pre-submission consultation stage was published in the free newsletter issued to most dwellings in the District.
Local media	Notices were published in local papers, and the subject received coverage within local newspaper articles.
Online consultation system	The Council utilised its new online consultation system for consultation on the Core Strategy Preferred Options. The system allows respondents to submit and view comments online. A link to the system was placed on the main page of the Council's website, along with a rolling banner promoting the opportunity to participate.
Posters	Posters were displayed in a number of premises across the District, advertising the Core Strategy consultation and the public exhibitions in particular.

A total of 951 representations were made at this stage by 214 different respondents. Of the 951 representations made, 714 objected to the Core Strategy Submission Document on the grounds of soundness / legal compliance. Table 6 provides a numerical break down of representations by subject.

Table 6 – Numerical breakdown of pre-submission consultation responses

Section / policy	No. Support: sound / legal compliant	No. Object: unsound / not legally compliant	Representations
Introduction	1	3	4
1.2	1	0	1
1.4	0	1	1
1.6	1	0	1
1.7	0	3	3
1.19	0	1	1
1.20	0	1	1
1.23	0	2	2
1.24	1	0	1
1.25	2	3	5
1.29	1	2	3
Spatial Characteristics, Issues and Opportunities	0	1	1
2.16	1	0	1
2.24	1	0	1
2.40	1	0	1
2.50	1	0	1
2.54	1	0	1
2.58	2	0	2
2.61	1	0	1
2.62	0	2	2
2.63	1	0	1
2.73	0	1	1
Vision	0	1	1
3.1	2	2	4
Housing	0	10	10
Vision	0	2	2
Objectives	1	2	3

Introduction	2	3	5
4.3	0	1	1
4.4	0	1	1
4.6	5	4	9
4.7	0	1	1
4.8	1	3	4
4.9	5	5	10
4.10	0	1	1
4.11	1	1	2
The efficient use of land for housing	0	2	2
4.13	0	3	3
4.14	1	7	8
4.15	1	0	1
Policy H1 - The efficient use of land for housing	8	79	87
4.16	4	6	10
4.17	2	3	5
4.18	1	4	5
4.19	1	8	9
4.23	0	4	4
Policy H2 - Extensions to residential envelopes and phasing	11	140	151
Extension to residential envelopes post-2021	0	1	1
4.24	0	4	4
4.28	0	2	2
Policy H3 - Extension to residential envelopes post-2021	2	20	22
4.29	1	0	1
4.30	0	1	1
4.31	1	0	1
4.32	1	0	1
Policy H4 - Affordable Housing	4	7	11
4.33	0	1	1
Policy H5 - Dwelling Types	5	2	7
Policy H6 - Lifetime Homes	1	5	6
Policy H7 - Gypsy and Traveller Accommodation	2	6	8

Appendix H1	2	24	26
Appendix H2	0	6	6
Character of Place	0	1	1
5.1	0	1	1
5.4	1	2	3
Policy CP1 - Design	3	1	4
Policy CP2 - Conservation Areas	1	0	1
5.17	0	2	2
Policy CP3 - Local List	2	0	2
Vision	0	1	1
6.1	1	0	1
6.3	1	1	2
6.6	1	2	3
6.7	1	2	3
6.9	2	0	2
Policy GB1 - Green Belt Protection	7	14	21
Policy GB2 - Rural Diversification and Recreational Uses	2	1	3
Policy URV1 - Upper Roach Valley	2	1	3
7.9	0	1	1
Policy URV2 - Wallasea Island	2	1	3
Environmental Issues	0	1	1
Vision	0	2	2
Objectives	2	0	2
8.3	1	0	1
8.15	1	2	3
Policy ENV1 - Protection and Enhancement of the Natural Landscape and Habitats and the Protection of Historical and Archaeological Sites	2	2	4
Policy ENV2 - Coastal Protection Belt	3	1	4
8.22	0	3	3
Policy ENV3 - Flood Risk	3	4	7
Policy ENV4 - Sustainable Drainage System (SUDS)	1	5	6
8.27	1	0	1

Policy ENV5 - Air Quality	2	0	2
8.32	1	0	1
8.33	1	0	1
8.35	1	0	1
Policy ENV6 - Large Scale Renewable Energy Projects	1	3	4
Policy ENV7 - Small Scale Renewable Energy Projects	2	1	3
Policy ENV8 - On-Site Renewable and Low Carbon Energy	4	2	6
Policy ENV9 - Code for Sustainable Homes	3	4	7
Policy ENV10 - BREEAM	1	1	2
Community Infrastructure, Leisure and Tourism	1	0	1
9.1	0	1	1
Policy CLT1 - Planning Obligations and Standard Charges	7	7	14
9.9	0	1	1
9.12	1	0	1
Policy CLT2 - Primary Education, Early Years and Childcare Facilities	3	4	7
Policy CLT3 - Secondary Education	3	2	5
Healthcare	1	1	2
Policy CLT4 - Healthcare	1	1	2
Policy CLT5 - Open Space	4	3	7
Policy CLT6 - Community Facilities	2	1	3
Policy CLT7 - Play Space	1	0	1
Youth Facilities	1	0	1
Policy CLT8 - Youth Facilities	2	0	2
Leisure Facilities	1	0	1
Policy CLT9 - Leisure Facilities	1	4	5
9.47	1	0	1
Policy CLT10 - Playing Pitches	2	2	4
Policy CLT11 - Tourism	1	0	1
Appendix CLT1	1	4	5
Transport	0	7	7
Vision	2	0	2
Introduction	0	3	3

10.5	0	2	2
10.7	1	0	1
10.9	0	2	2
10.12	1	0	1
10.13	1	0	1
Policy T1 - Highways	8	40	48
Policy T2 - Highways Improvements	3	31	34
Public Transport	0	1	1
Policy T3 - Public Transport	6	5	11
Policy T4 - South Essex Rapid Transit (SERT)	1	9	10
Travel Plans	0	1	1
Policy T5 - Travel Plans	2	1	3
Policy T6 - Cycling and Walking	6	0	6
Policy T7 - Greenways	1	0	1
Policy T8 - Parking Standards	7	3	10
Vision	1	0	1
11.6	0	1	1
11.11	0	1	1
11.19	1	0	1
Policy ED1 - Employment Growth	4	2	6
11.20	1	0	1
11.24	0	1	1
11.25	1	0	1
Policy ED2 - London Southend Airport	4	10	14
11.32	0	14	14
Policy ED3 - Existing Employment Land	5	12	17
Policy ED4 - Future Employment Allocations	2	14	16
Policy RTC1 - Retail in town centres	1	0	1
Policy RTC2 - Sequential approach to retail development	0	1	1
Policy RTC3 - Village and Neighbourhood Shops	1	0	1
Policy RTC4 - Rayleigh Town Centre	1	1	2

Policy RTC5 - Rochford Town Centre	2	0	2
Hockley Town Centre	0	1	1
12.35	0	1	1
12.37	0	1	1
12.38	0	5	5
12.39	0	1	1
Policy RTC6 - Hockley Town Centre	1	51	52
Implementation, Delivery and Monitoring	1	5	6
Key Diagram	1	2	3

In addition to such representations, a number of comments were also submitted which did not refer to either soundness or legal compliance. These are available to view separately. Similarly, additional evidence submitted by respondents during the pre-submission consultation is available to view separately.

A summary of the issues raised at pre-submission consultation, together with initial officer comments on these, is detailed in Appendix 3. The detail of representations made is set out in Appendix 4.

Appendix 1 – Specific Consultation bodies consulted

Althorne Parish Council
Anglian Water Services Ltd
Arriva Southern Counties
Ashingdon Parish Council
Barling Magna Parish Council
Basildon District Council
British Wind Energy Association
Burnham on Crouch Town Council
c2c Rail & National Express East Anglia
Canewdon Parish Council
Castle Point Borough Council
Chelmsford Borough Council
Coal Authority
CPREssex
Crouch Harbour Authority
Defence Estates
DEFRA
Disability Essex
East of England Development Agency
English Heritage
Environment Agency
Essex & Suffolk Water
Essex Autistic Society
Essex Bridleways Association
Essex Chambers of Commerce
Essex County Council
Essex Libraries
Essex no 1 Circuit of Jehovah's Witnesses
Essex Police Authority
Essex Wildlife Trust
Essex Wildlife Trust Rochford & Southend Area
Essex Youth Service
Federation of Small Businesses
First Essex Buses
Foulness Parish Council
Go-East
Great Wakering Parish Council
Grove Park Residents Association
Gypsy Council for Education Welfare & Civil Rights
Hawkwell Action Group
Hawkwell Parish Council
Hawkwell Residents Association
Health & Safety Executive
Highways Agency
Hockley Chamber of Trade
Hockley Parish Council
Hockley Parish Plan Group
Hockley Residents Association
Home Builders Federation
Hullbridge Parish Council
Leigh Town Council
Little Burstead Parish Council
London Southend Airport
London Southend Airport Co Ltd
Maldon District Council
Mobile Operators Association
Nataional Farmers Union Rochford
National Grid Gas

National Trust
National Wind Power
Natural England
Natural England
Network Rail
Noak Bridge Parish Council
North Fambridge Parish Council
Paglesham Parish Council
Planning Inspectorate
Post Office Ltd
Purleigh Parish Council
Ramsden Bellhouse Parish Council
Ramsden Crays Parish Council
Rawreth Parish Council
Rayleigh Chamber of Trade
Rayleigh Mount Local Committee
Rayleigh Town Council
Roach Area Fairways and Conservation Committee
Rochford & District Chamber of Trade & Commerce
Rochford & Rayleigh CAB
Rochford Chamber of Trade
Rochford District Access Committee
Rochford Hundred Amenity Society
Rochford Hundred Golf Club
Rochford Parish Council
Royal Mail Group C/o Atisreal
RSPB
Runwell Parish Council
SE Essex Organic Gardeners
SEETEC
Society for the Protection of Ancient Buildings
South East Essex Friends of the Earth
South East Essex Green Party
South East Essex PCT
South Essex Natural History Society
South Woodham Ferrers Town Council
Southend-on-Sea Borough Council
Southminster Parish Council
Sport England
Stambridge Parish Council
Stow Maries Parish Council
Sustrans
Sutton Parish Council
Theatres Trust
Woodham Ferrers & Bicknacre Parish Council
Woodland Trust

Appendix 2a – Representations from National, Regional and Local Governmental Bodies

Summary of National, Regional and Local Government Comments on the Introduction

Introduction	
Organisation	Summary of representation(s)
GO East	<p>Commend the Council for the work carried out so far.</p> <p>Suggest that the final version provides greater detail on the evolution of the document.</p> <p>Final document should express policies in the form of firm actions.</p>
East of England Regional Assembly (EERA)	EERA state that overall, the preferred options put forward in the Core Strategy respond well to the Regional Spatial Strategy. There are no major conformity issues. EERA have some minor concerns with the amount of development proposed for greenfield sites and the Council's position with regards to larger renewable energy schemes.
East of England Development Agency (EEDA)	Note the importance of the Thames Gateway area in economic growth and suggest the ambitions of the Thames Gateway be included within the Core Strategy.
Rochford Parish Council	Comment that whilst it is necessary to look at sites for new housing, employment etc, existing infrastructure will have to be vastly improved and that the relevant Councils need to address such issues.
Rayleigh Town Council	<p>Contrary to the stated role of the Core Strategy, the location referred to as 'North of London Road' identifies a specific site, ruling out other suitable sites identified from the 'Call for Sites' exercise. This should be reworded to allow other areas to be considered.</p> <p>The area around Rawreth Lane and London Road suffers considerable congestion. This situation will be exasperated by the development of additional housing in the area.</p> <p>Express further concerns with regards to the road situation in this part of Rayleigh, including:</p> <ul style="list-style-type: none"> • Traffic from three schools existing onto roads

	<ul style="list-style-type: none"> • Traffic from E-On call centre exiting onto London Road • A127 is already exceeding its designated capacity • A130 is near to the limit of its capacity • Poor transport along London Road for older residents visiting Southend and Basildon hospitals • Shopping problems for all without cars • Lack of direct bus service to ASDA, Rawreth Lane <p>Note that there is no reference to any brownfield sites in Preferred Options H2 which appears to be a contradiction of preferred option on phasing and stated preference for brownfield sites.</p> <p>States that the argument as to why 'North Rayleigh' is not a preferred option in H2 is equally relevant to 'North of London Road'.</p>
Essex County Council	<p>Suggest a number of additional county strategies be added to the list of relevant strategies in the 'Additional Relevant Strategies' section.</p> <p>Suggest that reference to the historic environment is made and that the preferred option is included stating the need to protect the historic environment.</p>

Characteristics, Issues and Opportunities	
Organisation	Summary of representation(s)
GO-East	<p>Comment that the Council may wish to distinguish its 'spatial portrait' (and term it as such) from the other forms of characteristics, issues and opportunities.</p> <p>Text on page 14 which appears to be suggesting that the average household size in Rochford is a function of the relatively large number of families could be expressed in a clearer manner.</p>
Hawkwell Parish Council	<p>State that they are incensed by the failure to recognise Hawkwell as a settlement in its own right</p> <p>State that Hawkwell is the biggest Parish by population and second only to Rayleigh Town but appears to have been subsumed into Hockley.</p> <p>Express concern that as a settlement which is ignored in the Core Strategy, they are having little say on the future allocation of housing for the Parish.</p>

Vision	
Organisation	Summary of representation(s)
Essex County Council	<p>Suggest revising the scale of the Key Diagram because some of the illustrated features are too small to easily and readily identify. The Key Diagram should be diagrammatic and not shown on a map base.</p> <p>Key spatial issues between topics should be elaborated on, particularly the relationship between homes, jobs and community facilities and the balance between built-up areas and valued environments</p>
Hawkwell Parish Council	<p>State that they are incensed by the failure to recognise Hawkwell as a settlement in its own right</p> <p>State that Hawkwell is the biggest Parish by population and second only to Rayleigh Town but appears to have been subsumed into Hockley.</p> <p>Express concern that as a settlement which is ignored in the Core Strategy, they are having little say on the future allocation of housing for the Parish.</p>
GO East	<p>Text referring to vision appears to be based upon the separate document 'Vision to Reality'. The statement which is set out amounts to little more than a 'statement of intent'. The vision should be expressed much in the same way as it has been expressed in the text boxes at the start of each themed-based section.</p> <p>Expression of vision within text boxes is an unconventional way of doing it and Council should be satisfied that it is an appropriate method.</p> <p>Linkage between vision, what is written in text boxes and subsequent text is inconsistent and confusing.</p>

Summary of National, Regional and Local Government Comments on the Housing Chapter

Housing Introduction	
Organisation	Summary of representation(s)
GO East	The Core Strategy should avoid repeating national policy. In some sections supporting text repeats national planning policy statements (PPS). References to PPS should be avoided in policies.
Rayleigh Town Council	State that Local Area Agreement Priority 5 (Essex Roads are safer, less congested and everyone has access to essential services) is unrealistic as it ignores the fact that public transport is poor with little prospect of improvement and walking or cycling are not viable alternatives for the not so young or fit.
Hawkwell Parish Council	<p>Cannot agree that finding locations for almost three and a half thousand new homes (or a 10% increase) should be addressed on the basis of cramming them into existing settlements. Suggest that this requires a much more strategic view and the piecemeal approach based on a 'call for sites' is totally inadequate.</p> <p>Believe there is strong argument that a new settlement would be far greener and thus, in the longer term, more sustainable than a myriad of smaller in fill sites. This option must not be rejected out of hand as is currently the case</p>

Preferred Option H1 – Distribution	
Organisation	Summary of representation(s)
East of England Regional Assembly (EERA)	In accepting that the government target for at least 60% of new development to be accommodated on previously developed land might not be achievable in all areas of the region, the Council is encouraged to maximise the development potential of all brownfield sites, including windfall sites.
Castle Point Borough Council	<p>Support the approach to prioritise previously developed land and recognise the need to develop on the edge of urban areas in order to avoid over-development of existing settlements.</p> <p>Potential development sites on the edge of settlements should be assessed in terms of how they contribute towards the purposes of the Green Belt, as stated in PPG2.</p>
Hawkwell Parish Council	Do not believe that the preferred options constitute a balanced strategy.

	<p>Express concern that proposed option to resist intensification is contrary to current approach and that it will not be enforced.</p> <p>Are concerned that the interpretation of sustainability has been insufficiently addressed and request that any proposal for a specific site be accompanied by a clear and unequivocal statement of the results of the test of sustainability and that only developments where the assessment shows a clear positive result in respect of sustainability are approved. Furthermore we would request that each site is tested against the sustainability test developed for a 'new' settlement to allow a fair comparison of advantages and disadvantages.</p> <p>Note that government policy is that 60% of the development should be on brown field sites and the balance on green field. Note the indications emerging from the Core Strategy document seem to have reversed the policy with the higher percentage on green field sites and the balance on brown field.</p>
GO East	<p>Comment that there should be a cross reference between policy on distribution and policy on general locations.</p>
Essex County Council	<p>Suggest amendment that Core Strategy promotes residential development at a density of 75+ dwelling per hectare in town centres in order to reduce requirement for Green Belt release.</p> <p>Support the prioritisation of previously development land for development.</p>

General Locations and Phasing	
Organisation	Summary of representation(s)
Rochford Parish Council	<p>Express concern at lack of identification of precise locations.</p> <p>Express concern with regards to the ability of infrastructure to cope with the District's housing requirement.</p> <p>Acknowledge that additional housing in the District is necessary.</p> <p>Development could be added onto existing areas but suggest that a new village be created towards the Rawreth Lane / London Road area of</p>

	Rayleigh. Suggest that the new village include retail, education, recreational, health, community and public transport facilities.
Essex County Council	Essex County Council wish to clarify, in relation to reference to viability of small schools in the document, that there is a presumption against the closure of rural schools.
Rawreth Parish Council	<p>State that they are extremely disappointed at the lack of integrity by Members of the Local Development Framework sub-committee regarding the allocation figures for housing in the District.</p> <p>Rawreth has not appeared in previous paperwork and should be considered a Tier 4 settlement.</p> <p>Rawreth is not part of, and should be considered separate from, Rayleigh.</p> <p>Development of 1050 dwellings within Rawreth represents a 228% increase and is unjustifiable, unsustainable and would destroy the character of Rawreth.</p>

Preferred Option H2 – General Locations and Phasing	
Organisation	Summary of representation(s)
Hawkwell Parish Council	<p>Acknowledge the strong opposition to any development of Green Belt in Hawkwell by many residents.</p> <p>Recognise external pressure to provide additional homes.</p> <p>Note that discussions and consultations today will influence the District for decades to come.</p> <p>The Core Strategy Preferred Option appears to distribute housing on an uneven basis.</p> <p>Strongly object to being subsumed into a settlement called Hockley / Hawkwell, and then being subjected to the majority of housing allocated to Hockley / Hawkwell.</p> <p>Hawkwell Parish Council's preferred option to deliver housing requirement is through the creation of a single new community, along with the required infrastructure. Such community would ideally be located West / North-West of the District to allow best access to public transport and road network.</p>

	<p>If the construction of a new community is rejected the policy of Hawkwell Parish Council is, in summary, as follows:</p> <ul style="list-style-type: none"> • Development should be shared between Parishes using a calculation based on Parish hectares or population • New development within the Parish must have minimum impact on Green Belt and not increase the village footprint. • Planning Authority should use Compulsory Purchase to ensure minimum impact on Green Belt and that village footprint is not enlarged. • Infrastructure should be in place prior to development.
<p>Essex County Council</p>	<p>Register support for the balanced approach to the distribution of housing based on tiers of settlement.</p> <p>However, Essex County Council also registered an objection to the same Preferred Options stating that locations North of London Road, Rayleigh and South East Ashingdon should be further examined. The former to ensure that infrastructure will serve the development in a timely and efficient manner and also give benefit to the existing adjoining community. The latter to ensure that the scale of development would not place undue pressure on the highway network passing through Rochford town centre.</p> <p>Essex County Council also comment that the provision of County Council services at all proposed development locations will require adequate funding through planning obligations and standard charges.</p>
<p>Rawreth Parish Council</p>	<p>Reference to Rayleigh West in fact means Rawreth. The area to the north of London Road is not Rayleigh but Rawreth.</p> <p>The Parish Council believe that the area to the north of London Road is highest quality farmland. The area is the “Gateway to Rochford” and is a strategic buffer between Rayleigh and Wickford.</p> <p>The area is a greenfield site. There are a number of sites identified as part of the Call for Sites that</p>

	<p>should be considered ahead of land North of London Road. These sites need to be visited and considered before a final decision is made.</p> <p>Describe the housing proposal as unjust.</p> <p>The development would not benefit the Parish.</p> <p>Parish of Rawreth does not have the infrastructure to cope with any more development. No development should take place until infrastructure is in place, and the roads are capable of taking the increased traffic that would result from development.</p> <p>Drains and sewers are close to capacity. Localised flooding already occurs and increased house building will exasperate the situation.</p> <p>Rawreth Lane is regularly at a standstill.</p> <p>Suggest that a figure of 40 dwellings would be a fairer figure for the Parish.</p> <p>West Hullbridge development would also cause traffic problems.</p> <p>Watery Lane / Hullbridge Road is an extremely dangerous junction.</p> <p>Question where traffic would go once it reaches the end of Watery Lane, as the bridge at Battlesbridge is restricted and the junction with A1245 is dangerous.</p> <p>The Parish Council believe that RDC should consider the use of smaller sites and that a large development to the North of London Road should be refused.</p> <p>The Parish Council are currently in the process of developing a community garden in the centre of Rochford and suggest that a reasonably sized development of houses in this area could be of benefit to the village. They suggest that a development of this size could include a village shop that would be of enormous value to local residents.</p>
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Affordable Housing	
Organisation	Summary of representation(s)
Hawkwell Parish Council	<p>Expect any new development to include a mix of properties encompassing 'affordable', 'social' and others that encourages a broad demographic spread and sustains a housing chain that may include, where absolutely necessary, flat/apartment developments of no more than three stories and in the 'Garden Flat' style.</p> <p>Loss of bungalows by way of conversion to executive homes has resulted in the loss of affordable dwellings from the housing supply.</p> <p>The Planning Authority need to create a positive and direct link between employment and accommodation.</p> <p>Request that the term 'affordable' be more clearly and realistically defined.</p> <p>Note that the recent Roach Close development is beyond the means of local people who wish to get onto the housing ladder without social need.</p>
Ashingdon Parish Council	<p>Comment that they accept that more homes must be built in the District. State that sharing homes around equally seems reasonable.</p>

Gypsy and Traveller Accommodation	
Organisation	Summary of representation(s)
East of England Regional Assembly (EERA)	<p>EERA welcome the preferred option to make provision in line with recommendations set out in the Regional Spatial Strategy Single Issue Review.</p>

Summary of National, Regional and Local Government Comments on the Green Belt Chapter

Protection of the Green Belt	
Organisation	Summary of representation(s)
Rayleigh Town Council	Strongly agree with the five purposes of the Green Belt set out at the beginning of the section.
Rochford Parish Council	Green Belt release should only occur if absolutely necessary and must be limited and tightly controlled.
Ashingdon Parish Council	The Green Belt must be protected as much as possible; every scrap of brownfield land should be sensitively used.

Preferred Option GB1 – Protection of the Green Belt	
Organisation	Summary of representation(s)
GO East	Clear intentions on how actions will be delivered are required.
East of England Regional Assembly (EERA)	Where the release of Green Belt in order to accommodate required levels of development is unavoidable, the proposal to use that which least contributes to the main purposes of the Green Belt seems appropriate.
Castle Point Borough Council	Support the protection of the Green Belt and the release of Green Belt based on how well the land helps to achieve the purposes of the Green Belt and separation of settlements.

Preferred Option GB2 – Rural Diversification, Green Tourism and Recreational Uses	
Organisation	Summary of representation(s)
Sport England	Supports GB2, however careful guidance in terms of siting and design will be needed.
Natural England	Support rural diversification within the Green Belt such as green tourism and outdoor recreation, provided these activities are linked with environmental enhancements and an increase in biodiversity.

Summary of National, Regional and Local Government Comments on the Economic Development Chapter

Economic Development Introduction	
Organisation	Summary of representation(s)
GO East	Policies in the Core Strategy need to relate to firm actions
Rochford Parish Council	Believe that there are very few people who do not want the airport to succeed but the overwhelming concern is regarding 24 hour operational action at the airport, and with the proposed obvious increase in flights, quite a large proportion of the residents of both Rochford and Southend would have very little sleep. This would cause enormous health and economic problems.

Preferred Option ED1 – London Southend Airport and Environs	
Organisation	Summary of representation(s)
East of England Regional Assembly (EERA)	Note that the delivery of London Southend Airport is regionally significant. Refer the Council to their earlier comments submitted as representations on the Joint Area Action Plan.
East of England Development Agency (EEDA)	Note that the Regional Economic Strategy identifies the airport as having the potential to be a gateway for Thames Gateway. Welcome the Area Action Plan approach, adding that it should ensure that the role of the airport and its potential as a focus and catalyst for economic growth is fully harnessed and developed.
Essex County Council	Support the comprehensive development of London Southend Airport, although a commitment to work to mitigate any adverse impacts on the environment or local amenities should be clearly stated. The Core Strategy should also explore how it could support the take-up of these jobs through adult learning and re-training opportunities.
Natural England	Natural England are concerned with the impact of the growth in the airport on air quality and on the disturbance of Natura 2000 sites (sites of international ecological importance protected by legislation).
Hawkwell Parish Council	There is too much reliance on the development of the airport and its environs, involving the release of Green Belt. It appears to be assumed that the new residents will work there, thus justifying the large housing allocation in or adjacent to the Parish.

Preferred Option ED2 – Employment Growth	
Organisation	Summary of representation(s)
East of England Development Agency (EEDA)	Support option but suggest it is strengthened with inclusion of reference to providing a range of employment uses.
Essex County Council	<p>Support the approach, including focus on specific regeneration projects but believe the Core Strategy should also consider a contingent approach in the event such projects are delayed.</p> <p>Believe that the document does not take enough account of the small businesses dotted between the various industrial estates and elsewhere. The balance should be redressed by setting out how the vision and strategy will assist such small businesses to develop and fulfil a future role in the local economy.</p> <p>Suggest acknowledgement of the medical sector in Rochford and the importance of developing adult skills.</p>
Rawreth Parish Council	<p>Object to loss of Green Belt for employment to the south of London Road. Suggest an area bounded by A127, A130, A1245 and railway line as an alternative. This would provide an opportunity to provide a well-designed industrial estate with potential to utilise alternative forms of transport in the future.</p> <p>Suggest use of land opposite Michelin Farm to provide some of the required Gypsy and Traveller pitches and to remove the unauthorised site on the A1245 at Bedloes Corner.</p>

Preferred Option ED3 – Exiting Employment Land	
Organisation	Summary of representation(s)
GO East	<p>Existing employment sites to be reviewed should be specifically identified in the document.</p> <p>Allocations in terms of quantum of floorspace should be set out.</p> <p>Different uses and their locations should be set out.</p>

Preferred Option ED4 – Future Employment Allocations	
Organisation	Summary of representation(s)
Rayleigh Town Council	State that reliance on the A127 and A130 links cannot be guaranteed ad infinitum.

	The general area indicated was apparently ruled out for housing development by the Highways Agency and would therefore be unsuitable for commercial and industrial use.
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Alternative Option ED4 – Future Employment Allocations

Preferred Option ED5 – Eco-Enterprise Centre

Organisation	Summary of representation(s)
Essex County Council	Support this approach, but warn that the viability of such projects will need to be carefully considered. Note that there are a number of other such centres around the County and that this centre should offer something which differentiates it from competing centres.
Castle Point Borough Council	Encourage the Council to prepare evidence that demonstrates the deliverability of the eco-enterprise centre.
Rayleigh Town Council	Statement is too vague and location is not indicated.

Summary of National, Regional and Local Government Comments on the Environmental Issues Chapter

Protection and Enhancement of the Natural Landscape and Habitats	
Organisation	Summary of representation(s)
Natural England	<p>Pleased to see mention made of intention to support the Crouch and Roach Management Plan.</p> <p>State that the Council should also be seeking to enhance biodiversity through development in accordance with PPS1 and PPS9. This will involve retaining existing natural features within any development and seeking opportunities to create new habitats and link in with existing adjacent habitats.</p>

Preferred Option ENV1 – Protection and Enhancement of the Natural Landscape and Habitats	
Organisation	Summary of representation(s)
Natural England	<p>Supports the overall aims of ENV1, but would like to see the following to be included in the final policy:</p> <ul style="list-style-type: none"> • Wildlife Networks • Designing in Wildlife • BAP Targets • Landscape Character
Natural England	<p>Supports the overall principles of ENV2, but would suggest that the policy gives explicit recognition to the implications of climate change and sea level rise, and the need for necessary adaptation, but not only defending the 'static' situation.</p>

Preferred Option ENV2 – Coastal Protection Belt	
Organisation	Summary of representation(s)
Environment Agency	<p>Supports the overall principles of ENV2, but would suggest that the policy gives explicit recognition to the implications of climate change and sea level rise, and the need for necessary adaptation, but not only defending the 'static' situation.</p>

Preferred Option ENV3 – Flood Risk	
Organisation	Summary of representation(s)
Environment Agency	<p>Would like to see "We will continue to work with the EA manage flood risk in a sustainable manner through capitalising on opportunities to make space for water wherever possible and through the continued provision of flood defences where necessary." Added.</p> <p>State that this is a key message coming out of the Thames Estuary 2100 Project group and, while</p>

	<p>Rochford District does not fall within the study boundary, including this in our policy would ensure consistency throughout the Thames Gateway area.</p> <p>Wish to see addition of reference for need for applications with Flood Zone to be accompanied by a flood risk assessment.</p>
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Preferred Option ENV4 – Sustainable Drainage Systems (SUDS)

Organisation	Summary of representation(s)
GO East	Large scale development is not defined
Rayleigh Town Council	SUDS relies on the Environment Agency to maintain watercourses and ditches in a suitable manner (which the Town Council state is presently lacking) without this there will undoubtedly be future problems. This section needs to be far more robust
Environment Agency	Agrees with the aims of ENV4 and believes that SUDs provide some positive ways to increase biodiversity.

Preferred Option ENV5 – Air Quality Management Areas

Organisation	Summary of representation(s)
Castle Point Borough Council	Support the protection and improvement of air quality; however the preferred option should clarify the measures that will be taken to improve air quality.

Preferred Option ENV6 – Large Scale Renewable Energy

Organisation	Summary of representation(s)
East of England Regional Assembly (EERA)	It is suggested that this policy should state what schemes the Council would be willing to support.
Natural England	<p>Recommends that the Council refers to the Essex Landscape Character Assessment when when considering locations for renewable energy installations.</p> <p>Notes that an appropriate balance needs to be struck between site protection and the promotion of renewable and low-carbon energy generation projects. To achieve this, a fuller criteria-based policy should be included in the Development Control Policies Development Plan Document.</p>

Preferred Option ENV7 – Small Scale Renewable Energy Projects

Organisation	Summary of representation(s)
GO East	Council need to ensure that this wholly accords with the PPS1 Supplement on Climate Change. At present the wording appears to suggest a greater

	level of restraint than that intended by national policy
East of England Regional Assembly (EERA)	Although this standpoint is welcomed difficulties may arise in measuring the effectiveness of small scale schemes and relating this back to regional and national targets. EERA will be looking for the relevant Development Control documents to show how targets will be met.
Natural England	Support of small scale energy projects as part of sustainable design and construction.

Preferred Option ENV8 – Code for Sustainable Homes

Organisation	Summary of representation(s)
East of England Regional Assembly (EERA)	Suggest a timescale for the implementation of these standards is set out.
Environment Agency	<p>General support this approach as it is consistent with the approach they take in Norfolk, Suffolk and Essex.</p> <p>Ask that the Council, however, consider revising the approach so that it is line with government objectives, noting that this option proposes higher standards. The Council will need to be sure such standards are deliverable.</p>
Castle Point Borough Council	CPBC has been advised by developers that Code level 3 is achievable however Level 4 and beyond significantly impacts on the economic viability of the development. The requirement for meeting level 6 by 2013 should be tested at a local level to ensure that it is viable.

Alternative Option ENV8 – Code for Sustainable Homes

Organisation	Summary of representation(s)
GO East	The evidence base needs to demonstrate why this requirement should be introduced
Environment Agency	<p>Generally support this approach as it is consistent with the approach that is taken in other local authority areas in Norfolk, Suffolk and Essex. Support the idea of a stepped approach but ask the Council to consider revising this in line with central Government objectives as set out in "Building a Greener Future: Towards Zero Carbon Development". The proposed standards are higher than those suggested by Government so the Council will need to be certain that they are achievable within the time frame.</p>

Preferred Option ENV9 – BREEAM	
Organisation	Summary of representation(s)
GO East	The evidence base needs to demonstrate why this requirement should be introduced
East of England Regional Assembly (EERA)	Suggest a timescale for the implementation of these standards is set out.
Essex County Council	Object to the Council not intending to implement the 'Merton Rule', stating that the BREEAM rating does not include provision of renewable energy generation for new buildings. Suggest the policy should be expanded to incorporate the 'Merton' rule that at least 10% of energy estimated to be used by new development will be required to be produced by on-site renewable energy generation. This would also be consistent with the Urban Place Supplement.
Environment Agency	Support this approach.

Contaminated Land	
Organisation	Summary of representation(s)
GO East	Question where the contaminated land within the District is to be found

Preferred Option ENV10 – Contaminated Land	
Organisation	Summary of representation(s)
Environment Agency	Support this option as it is consistent with national policy.

Summary of National, Regional and Local Government Comments on the Transport Chapter

Transport Introduction	
Organisation	Summary of representation(s)
East of England Regional Assembly (EERA)	Suggest that opportunities to facilitate home-working within new development proposals should not be ignored, in the interests of reducing the need to travel by car.
Essex County Council	State that the transport aspects of the Core Strategy are well rounded and make good reference to the transportation aspirations of the County.
Hawkwell Parish Council	Proposed residential development will lead to congestion on all routes to and from Hawkwell. Options in this section lack real substance and question what guarantee there can be that private companies will continue to provide public transport.

Preferred Option T1 – Highways	
Organisation	Summary of representation(s)
Castle Point Borough Council	Support reduce reliance on private car, but note that it is still essential to recognise that highway improvements may be required.
Rayleigh Town Council	Strongly support this preferred option, question what safeguards will be put in place to ensure that s106 agreement monies are spent on infrastructure.
Rawreth Parish Council	Believe that roads and infrastructure are at full capacity. Rawreth Lane and Water Lane cannot take any more traffic. Proposed development will bring traffic to an unsustainable level.

Preferred Option T2 – Public Transport	
Organisation	Summary of representation(s)
Rayleigh Town Council	Encouraging alternatives to the car must not be used as an excuse to lower standards of parking. This section needs to be more prescriptive.

Preferred Option T5 – Cycling and Walking	
Organisation	Summary of representation(s)
Essex County Council	Suggest the addition of the following to the preferred option: <ul style="list-style-type: none"> • Cycle parking and incentives to cycle to be provided at residential developments • Specific reference to 'schools' to the list of locations to be linked by a safe and convenient network of cycle and pedestrian

	routes
Natural England	Support the preferred option. State that footpaths and cycleways should be provided as part of new development layouts which will contribute to sustainable transport and also provide informal recreation opportunities to help improve the health and well-being of residents.

Preferred Option T6 – Greenways

Organisation	Summary of representation(s)
Natural England	Natural England is supportive of the Thames Gateway Green Grid Strategy and would see the provision of greenways as a contribution to a wider network of green infrastructure.

Preferred Option T7 – Parking Standards

Organisation	Summary of representation(s)
Hawkwell Parish Council	Express concern over proposed minimum parking standards, stating that the District has insufficient resources to manage the consequential bad parking that occurs with car parked over pavements.
Rayleigh Town Council	Strongly support the application of minimum parking standards.

Summary of National, Regional and Local Government Comments on the Retail and Town Centres Chapter

Preferred Option RTC1 - Retail	
Organisation	Summary of representation(s)
GO East	Question the amount of floorspace being directed to the stated locations

Town Centres	
Organisation	Summary of representation(s)
Essex County Council	<p>Support the varied approach being taken to the development of Rayleigh, Rochford and Hockley town centres.</p> <p>Suggest that the Core Strategy expresses mix of uses and projected economic impact in a more qualitative fashion.</p> <p>Recommend that the role and importance of non retail uses within town centres is recognised.</p>

Preferred Option RTC5 – Hockley Town Centre	
Organisation	Summary of representation(s)
Hawkwell Parish Council	The Hockley and Rochford Town Centre Studies have not yet been completed and the Parish Council require that these are completed and properly considered before any decisions are taken.

Summary of National, Regional and Local Government Comments on the Character of Place Chapter

Character of Place Introduction	
Organisation	Summary of representation(s)
Rochford Parish Council	Whilst agreeing it is desirable to keep the traditional buildings, where possible the public would wish to see any new build in keeping and fitting in with the character of the surrounding areas.

Preferred Option CP1 – Design	
Organisation	Summary of representation(s)
Essex County Council	Suggest the text be amended to read, 'Developers of large residential schemes should adhere to design briefs produced in conjunction with, and approved by, the district council.'
Natural England	Support this option. Glad to note that Village Design Statements have been included in the policy wording as this is an initiative which Natural England actively promotes. Suggest that opportunities be sought to promote accessible greenspace provision.

Local Lists	
Organisation	Summary of representation(s)
Hawkwell Parish Council	Welcome the re-introduction of the local list

Summary of National, Regional and Local Government Comments on the Community Infrastructure, Leisure and Tourism Chapter

Community Infrastructure, Leisure and Tourism Introduction	
Organisation	Summary of representation(s)
Rochford Parish Council	There needs to be assurances that infrastructure will be provided at the outset of any new scheme.
Ashingdon Parish Council	Agree that additional infrastructure must be provided to support the new residents and prevent existing residents suffering from stretched and weakened services; roads, schools, sewerage, health facilities, etc.

Preferred Option CLT1 – Planning Obligations and Standard Charges	
Organisation	Summary of representation(s)
Environment Agency	Suggest that developers contribute towards flood defences where appropriate.
Natural England	Suggest that countryside recreation projects including the management and maintenance of greenspace, wildlife sites and environmental improvements should be included in the list of activities that planning obligations and charges could contribute to
Castle Point Borough Council	The use of standard charges is consistent with circular 5/05 planning obligations. Standard charges provide greater certainty for developers. Developer contributions should however be the subject of negotiation as there may be economic viability reasons why the value of a development may not be able to support the standard charge.
Rayleigh Town Council	It is unrealistic to expect the shortfall in infrastructure funding be made up by standard charges (around £300,000 per dwelling across the district). It is therefore essential to state that these plans are unsustainable without considerable government funding.

Alternative Option CLT1 – Planning Obligations and Standard Charges	
Organisation	Summary of representation(s)
Ashingdon Parish Council	Support the Council in demanding infrastructure improvements to accompany new developments. Believe that, whenever possible, developers must be required to pay for these improvements to the existing infrastructure. Stress that we must work together to pressurise government authorities responsible for

	infrastructure (roads, schools, sewerage, health, etc.) to agree that additional provision is required; and to ensure that these agreed improvements are actually made.
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Education	
Organisation	Summary of representation(s)
Essex County Council	<p>The final paragraph of the commentary in the Education section, which refers to school transport plans, should be expanded to note that housing developments in excess of two miles from sufficient key stage one provision via a safe walking route or three miles from provision for older children must mitigate their impacts and facilitate appropriate school transport.</p> <p>The commentary in the Education section should include reference to Early Years and Childcare (EY & C) provision. Make three points:</p> <ul style="list-style-type: none"> • New primary schools should include commensurate EY&C facilities • Although Hockley does not require a new primary school EY&C provision must be expanded • The more rural areas, in particular Canewdon, Great Wakering and Hullbridge, will require additional EY&C places

Preferred Option CLT2 – Primary Education, Early Years and Childcare Facilities	
Organisation	Summary of representation(s)
Rawreth Parish Council	Object, noting that surpluses of Primary School Places are projected in areas of Rayleigh. Suggest that development is spread around Rayleigh in smaller sites so as to avoid closure of existing schools and prevent unnecessary provision of a new school.

Preferred Option CLT4 – Healthcare	
Organisation	Summary of representation(s)
Castle Point Borough Council	Support the requirement for new developments to be accompanied by a Health Impact Assessment (HIA). Suggest that a threshold should be considered. The preferred option currently requires all developments to have an assessment. The Local Area Agreement for Essex suggested a threshold of 50 dwelling units. They have used this as a starting point for developing a HIA policy in their emerging Core Strategy.

Alternative Option CLT4 – Healthcare	
Organisation	Summary of representation(s)
Rayleigh Town Council	<p>Suggest that a better alternative to the primary care centre located in the preferred area is the provision of an outreach outpatient centre associated with Southend Hospital to perform routine blood tests, x-rays and a minor injuries clinic etc. reducing the need to travel and relieving the pressure on hospital services while leaving GP provision where it is at present.</p> <p>New proposed residential areas are too far away from eastern areas of Rayleigh .The location of healthcare facilities should be as near to the town centre as possible.</p>

Preferred Option CLT5 – Open Space	
Organisation	Summary of representation(s)
GO East	Document should state the standards to be applied.
Rayleigh Town Council	Needs to be more specific and robust, in particular in forming a barrier between any new development and the A1245, preventing further westward sprawl in future years.
Sport England	Support with modifications - reference to background documents such as the emerging Playing Pitch Strategy would be helpful, as would be a cross-reference to Preferred Option CLT10 (Playing Pitches).

Preferred Option CLT6 – Community Facilities	
Organisation	Summary of representation(s)
Rayleigh Town Council	Strongly support this option.

Preferred Option CLT7 – Play Space	
Organisation	Summary of representation(s)
GO East	Document should state the standards to be applied

Preferred Option CLT8 – Youth facilities	
Organisation	Summary of representation(s)
GO East	Document should state the standards to be applied

Preferred Option CLT9 – Leisure Facilities	
Organisation	Summary of representation(s)
Rayleigh Town Council	Considered an opportunity exists to obtain developer contributions to expand leisure facilities with the provision of a swimming pool at Rayleigh Leisure Centre

	Suggest that this is included in CLT9
Sport England	<p>Agrees with the board content, but reference to PPG17 should be made in the Core Strategy. Believes that the Essex Sports Facilities Strategy (2008) should be used to inform the preparation of the Core Strategy in terms of planning for the provision of community sports facilities. Moreover, reference to Sport England's document 'Active Design' would be useful to encourage clearer thinking about the role of good urban design in promoting physical activity.</p> <p>Would advise that a number of other Core Strategies have been considered to be unsound due to the lack of a credible evidence base.</p>

Preferred Option CLT10 – Playing Pitches

Organisation	Summary of representation(s)
Essex County Council	Suggest that this should be revised to clarify that it only applies to public rather than private pitches. Application of the policy to school playing pitches would restrict implementation of long term site management plans and school reorganisation.
Sport England	Support the overall principle of CLT10, but reference to PPG17 should be made in the Core Strategy. Reference to Sport England guidance is helpful, as is the commitment to produce a SPD on playing pitch provision. It is assumed that this document will set out local standards for their provision.

Preferred Option CLT11 – Tourism

Organisation	Summary of representation(s)
Natural England	Supports the preferred option particularly the proviso that green tourism projects should not adversely impact on character of place or biodiversity. We would reiterate our previous comments that it should be mentioned in the policy wording that this approach is consistent with the objectives of the Thames Gateway South Essex Greengrid. Suggest text notes that the conversion of rural buildings could involve damage to protected species such as barn owls.

Summary of National, Regional and Local Government Comments on the Upper Roach Valley and Wallasea Island Chapter

Preferred Option URV1 – Upper Roach Valley	
Organisation	Summary of representation(s)
Environment Agency	Generally support this preferred option. Suggest inclusion of "Opportunities to reduce flood risk and enhance natural habitats by making space for water will be indentified." This will show consistency with their message for other Thames Gateway areas.
Rochford Parish Council	Vital that Green areas, some under Green Belt and some under recreational land, are retained where possible. If this is reduced too much the health of the new and existing population will start to suffer. Support the Upper Roach Valley and Wallasea Island schemes - for those who are able to travel to and take advantage of these areas. They will aid the conservation of the wildlife habitats for all to benefit by.
Preferred Option URV2 – Wallasea Island	
Organisation	Summary of representation(s)
Environment Agency	Support this preferred option.

Summary of National, Regional and Local Government Comments on the Implementation, Monitoring and Delivery Chapter

Implementation, Monitoring and Delivery	
Organisation	Summary of representation(s)
Essex County Council	<p>Support the inclusion of a section covering this topic.</p> <p>The tabulation of Implementation, Delivery and Monitoring matters in the final version should be expanded. In particular, the implementation and delivery material should provide a fuller description of schemes and projects, who will deliver them, funding requirements and/or sources, their priority and required timing, links with other projects and strategies, risk of non-achievement and contingency importance.</p> <p>Question whether proposed method of monitoring good design will be successful and suggest that reference to early years and childcare be made in relation to the monitoring of preferred option CLT2.</p>

Appendix 2b – Representations from Non-Governmental Organisations (NGO)

Summary of NGO Comments on the Introduction

Introduction	
Organisation	Summary of representation(s)
Hockley Parish Plan Group	Suggest that the Council introduce additional control on crime/ vandalism/ anti-social behaviour in Hockley in order to deal with increasing population.
Natural England	<p>Natural England is pleased to see Essex Landscape Character Assessment (2003) and the Local Wildlife Site Review (2007) were included in the Evidence Base.</p> <p>Natural England reminds the Council that the Core Strategy will require assessment against the Habitats Regulations. Overall growth targets, London Southend airport and development in or surrounding the coastal areas will need to be scrutinised.</p>

Vision	
Organisation	Summary of representation(s)
Hockley Residents Association	<p>Concern expressed regarding whether the interpretation of sustainability has been sufficiently addressed. Suggest that the sustainability test should be applied on each site.</p> <p>Hockley Residents Association fails to see how the intensification policy can be enforced in the preferred option.</p>
SE Essex Organic Gardeners	Suggest that agricultural will need to be looked at.
Natural England	Shares the same objectives with the Council and therefore supports the vision.

Summary of NGO Comments on the Housing Chapter

Housing Introduction	
Organisation	Summary of representation(s)
SE Essex Organic Gardeners	Suggest that more allotments and community gardens are needed. Under existing legislation, there is a duty on local authorities to provide sufficient numbers of allotments, if an allotment authority is of the opinion that there is a demand for allotments in the area.

Housing Distribution	
Organisation	Summary of representation(s)
Hockley Parish Plan Group	Suggests an alternative option of placing all 3500 homes in one new location with self supporting infrastructure.
SE Essex Organic Gardeners	Suggests that the impact on Hockley village will include: <ul style="list-style-type: none"> • Traffic congestion on main routes • Parking problems • Demand on health care service • Demand on school places • Demand on public transport
CPREssex	Believes that only 30% Brownfield sites for further housing developments is too low. Brownfield should be utilised where possible. A 70% use of green belt land is unacceptable.
Essex Chambers of Commerce	Urges the Council to improve the strategic highway network, especially the east-west route.
Renaissance Southend	Suggests that the 510 dwellings proposed for Great Wakering should be considered alongside the additional 1400 dwellings proposed in Southend's Core Strategy for Shoebury in the period 2001-2021. Suggests the development of an AAP or SPD to provide detailed planning guidance for this growth and recommends a joint approach to the development of these two areas.

Housing General Locations	
Organisation	Summary of representation(s)
Hockley Residents Association	Concern raised that no provision has been made for road improvements in Hockley and improvements are unlikely to be economically viable.
SE Essex Organic Gardeners	Suggest that the natural areas are under pressure. Suggest that the fields in and around Hockley West need to be kept for agricultural use.

CPREssex	<p>Suggest that the number of additional dwelling to be built in Canewdon is too high, and should be reduced.</p> <p>Concern expressed regarding community and recreational facilities, public transport, employment, and road network issues in Canewdon.</p>
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Alternative Option H1 – Distribution

Organisation	Summary of representation(s)
Hockley Residents Association	<p>The option of placing houses in a single site should be considered. Locating industry and housing separately contravenes government policy PPG4.</p> <p>The Seaside/Colonnade proposal for housing should be included as an alternative option.</p>

Preferred Option H2 – General Locations and Phasing

Organisation	Summary of representation(s)
Hockley Parish Plan Group	<p>Suggests that extra budget will be needed to provide extra community service for the additional population in Hockley.</p> <p>Improvement in health service will be needed to support the additional population in the area.</p> <p>Concern expressed regarding traffic congestion and car parking issues in Hockley and the surrounding area.</p>
Hockley Residents Association	Object to development along Rectory Road, Hawkwell. The combined impact on Hockley is not considered (e.g. traffic, urbanisation).
Hawkwell Athletic FC	Suggests that the infrastructure will need to be improved before building any more houses.
Rayleigh boys Youth Football club	<p>Strongly objects to the plan for building more homes in an already too densely populated area of Rayleigh.</p> <p>Requests improvements in the road network and public amenities before any more houses are built in Rayleigh.</p> <p>Green belt land should only be used for amenities for the people of Rayleigh.</p>
Hawkwell Action Group	<p>Strongly object to additional housing in Hawkwell for the following reasons:</p> <ul style="list-style-type: none"> • Infrastructure cannot cope

	<ul style="list-style-type: none"> • Identity will be lost • Poor public transport • Wildlife and greenfield will be lost.
Hawkwell Residents Association	<p>Object to the proposed development of 300+ houses in the village/Parish on the following basis:</p> <ul style="list-style-type: none"> • Lost of Greenbelt - unfair allocation of homes throughout the district especially in the Hawkwell area • Concern expressed that all of the 330 houses could be centred in one place changing the nature of the village • The B1013 cannot cope with extra traffic from what will be a developing airport facility (not considered as part of this strategy) • Extra demands on schools, dentists and doctor surgeries • Lack of public transport. <p>Feel that the Council fails to look at the district as a whole in the Core Strategy and have not considered the impact of the JAAP and site allocation development on Hawkwell.</p> <p>Additional homes should be built as a new village with self-contained services in the west of Rochford from a new access road to the A1245 (old A130).</p> <p>If the proposals go ahead with current housing and employment allocation, and an inevitable increase in airport traffic, Hawkwell Residents Association would like to see improvements and upgrades to all infrastructure; community and public services, public transport, recreation and leisure facilities etc. in place before the commencement of any new development.</p> <p>Suggests that the method of consultation is unfair - a heavy weight document preventing printing and general distribution.</p> <p>Suggests that the stated government policy of 60% brownfield first before greenfield seems to have been reversed.</p>

Alternative Option H2 – General Locations and Phasing	
Organisation	Summary of representation(s)
Hockley Residents Association	Suggests that there should be an option of focusing development in a few locations.

	The Seaside/Colonnade proposal for housing should be included as an alternative option.
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Housing – General Locations Post 2021

Organisation	Summary of representation(s)
Hockley Residents Association	Option of focusing development in a few locations should be given. The Seaside/Colonnade proposal for housing should be included as an alternative option.

Preferred Option H3 – General Locations Post 2021

Organisation	Summary of representation(s)
Hockley Residents Association	Suggests that no costing information is provided, plus Ashingdon Road will not be able to cope with the extra traffic created by the additional population.

Preferred Option H4 – Affordable Housing

Organisation	Summary of representation(s)
Shelter	<p>Recommends a higher percentage (40%) of affordable housing should be applied and housing requirements should be set for development of less than 15 dwellings (3 or more recommended).</p> <p>Suggests that the Council should state the government’s target (approximately 65% of affordable housing should be social rented housing) in preferred option H4.</p>

Alternative Option H4 – Affordable Housing

Organisation	Summary of representation(s)
CPREssex	Fully support the need for Affordable Houses in the Rochford Area.

Preferred Option H5 – Dwelling Types

Organisation	Summary of representation(s)
Shelter	Welcomes the proposal in both H4 and H5, however, suggests that the proportion of affordable housing provision within developments should be required in the form of four bedroom dwellings as well as three.

H Appendix 1

Organisation	Summary of representation(s)
Hockley Residents Association	Suggests that there are no details given on the viability of providing sufficient infrastructure in the proposal (e.g. traffic/road improvements, youth facilities and health centre in Rochford area).

Summary of NGO Comments on the Green Belt Chapter

Protection of Green Belt	
Organisation	Summary of representation(s)
Hockley Parish Plan Group	Suggests that the identity of Hockley as well as green belt in and around the area should be protected and preserved.
Hockley Residents Association	Supports the retention of the green belt, but the absence of infrastructure provision makes the Core Strategy unsustainable.
Renaissance Southend	Suggests that the Core Strategy should show a more explicit approach towards the green belt policy.

Preferred Option GB1 – Green Belt Protection	
Organisation	Summary of representation(s)
Hockley Parish Plan Group	Concern expressed regarding the large number of new houses to be built on green belt which could reduce open spaces between parishes and lead to coalescence between settlements, thus the loss of individual community identities.
Essex Chambers of Commerce	Suggests that sufficient flexibility needs to be allowed for within policy GB1 for the various important economic growth options of the JAAP. It is important for Rochford's planning to reflect the significant economic driver for South East Essex.
CPREssex	Concern expressed regarding the high proportion of proposed houses to be built on green belt. Brownfield sites should be the preferred option
Renaissance Southend	Suggests that policy GB1 is amended to provide for the potential amendment to the Green Belt boundary in order to realise the economic and employment potential of the airport through the Joint Area Action Plan (JAAP).

Preferred Option GB2 – Rural Diversification and Recreational Uses	
Organisation	Summary of representation(s)
Natural England	Supports GB2 as well as rural diversification within the green belt. The value of the green belt should be judged on its contribution to quality of life, nature conservation, landscape protection, flood mitigation and the impact of a changing climate.

Summary of NGO Comments on the Economic Development Chapter

Economic Development Introduction	
Organisation	Summary of representation(s)
Hockley Residents Association	Concern expressed regarding the impact caused by extra traffic on the roads (especially the B1013 and accessibility to the airport), and that the approach contravenes policy PPG4.
Federation of Small Businesses	<p>Suggests that due to the lack of sustainable road transport infrastructure in the district, there is a need to ensure that each centre of population has a concentration of suitable commercial premises to enable local employment to succeed.</p> <p>It is important to introduce commercial/mini business centres within the community, make good use of vacant and derelict land and buildings which would lead to local employment possibilities for the service based small businesses which have a vital role in the district.</p>

Preferred Option ED1 – London Southend Airport	
Organisation	Summary of representation(s)
Essex Chambers of Commerce	Supports ED1. Suggests that it must be followed by significant improvements to the highway infrastructure in the area to cope with the future growth.
Natural England	<p>Concern expressed regarding the impact of the growth in the airport on air quality and on the disturbance of Natura 2000 sites.</p> <p>Suggests encouraging enhanced North-South links including greenways, as envisaged in the Thames Gateway South Essex Greengrid Strategy.</p>
Renaissance Southend	<p>Suggests that the Core Strategy should give clearer guidance on the purpose and objectives for the Joint Area Action Plan (JAAP). The Core Strategy should identifying requirements of the land allocation for the 3,000 new jobs.</p> <p>In addition, they suggest that Policy ED1 should be amended to make it clear that the JAAP will be looking to examine how to manage the change required to realise the employment potential of the whole area included within the JAAP boundary.</p>

Preferred Option ED2 – Employment Growth	
Organisation	Summary of representation(s)
Essex Chambers of Commerce	Supports the principle of ED2, but would examine the detail of the Area Action Plans for Hockley and Rochford.

Preferred Option ED3 – Existing Employment Land	
Organisation	Summary of representation(s)
Essex Chambers of Commerce	Supports the review of existing employment land and the reallocation for housing where appropriate. It is essential to improve the highway infrastructure and access to all industrial estates to sustain employment, especially Purdeys Industrial Estate.

Preferred Option ED4 – Future Employment Allocations	
Organisation	Summary of representation(s)
Essex Chambers of Commerce	Supports ED4 as it provides opportunities for better quality business premises much closer to main roads.
Federation of Small Businesses	Agrees that ED4 provides a reasonable solution for both housing allocation and the industrial estate. However, some companies may have problems relocating due to the type and size of their operation (e.g. Baltic Wharf), and there may be a need to investigate further the accessibility and road infrastructure for staff and businesses at peak times.

Summary of NGO Comments on the Environmental Issues Chapter

Environmental Issues Introduction	
Organisation	Summary of representation(s)
Hockley Parish Plan Group	Suggest that there should be no additional air or noise pollution in Hockley caused by increased traffic volumes and the airport expansion.
Hockley Residents Association	Concern expressed that no consideration is given to pollution caused by extra traffic on the roads.

Environmental Issues - Protection and Enhancement of the Natural Landscape and Habitats	
Organisation	Summary of representation(s)
Natural England	Suggests that Natural England should be involved as a stakeholder in the Crouch and Roach Estuary Management Plan.

Preferred Option ENV1 – Protection and Enhancement of the Natural Landscape and Habitats	
Organisation	Summary of representation(s)
Natural England	Supports the overall aims of ENV1, but would like to see the following to be included in the policy: <ul style="list-style-type: none"> • Wildlife Networks • Designing in Wildlife • BAP Targets • Landscape Character

Preferred Option ENV2 – Coastal Protection Belt	
Organisation	Summary of representation(s)
CPREssex	Supports ENV2.
Natural England	Supports the overall principles of ENV2, but would suggest that the policy gives explicit recognition to the implications of climate change and sea level rise, and the need for necessary adaptation, but not only defending the 'static' situation.

Preferred Option ENV4 – Sustainable Drainage Systems (SUDs)	
Organisation	Summary of representation(s)
Natural England	Agrees with the aims of ENV4 and believes that SUDs provide some positive ways to increase biodiversity.

Preferred Option ENV6 – Large Scale Renewable Energy Projects	
Organisation	Summary of representation(s)
Natural England	Recommends that the Council refers to the Essex Landscape Character Assessment when considering locations for renewable energy installations.

	Notes that an appropriate balance needs to be struck between site protection and the promotion of renewable and low-carbon energy generation projects. To achieve this, a fuller criteria-based policy should be included in the DC Policies DPD.
Rochford Chamber of Trade	Disagrees with ENV6. Recommends that the following options should also be looked at and considered: <ul style="list-style-type: none"> • Combined heat and power plants • District heat Use of water power (e.g. underwater generators, barrage to generate Hydro Electric Power) in the River Crouch.

Preferred Option ENV7 – Small Scale Renewable Energy Projects

Organisation	Summary of representation(s)
Natural England	Supports ENV7.
Rochford Chamber of Trade	Recommends the following options should also be looked at and considered: <ul style="list-style-type: none"> • Combined heat and power plants • District heat • Use of water power (e.g. underwater generators, barrage to generate Hydro Electric Power) in the River Crouch.

Preferred Option ENV8 – Code for Sustainable Homes

Organisation	Summary of representation(s)
Natural England	Supports ENV8 as it shares the same objectives for sustainable design and construction as them. Recommends that the Council looks at the project “A New Vernacular for the Countryside” which addresses broad sustainable design and construction principles for the countryside.

Summary of NGO Comments on the Transport Chapter

Transport Introduction	
Organisation	Summary of representation(s)
Hockley Residents Association	Concern expressed regarding the impact of thousands of extra car movements each day in the district, and thinks that it contravenes government policy PPG 4 as there is a lack of public transport in the West and North where new housing are proposed to be built.

Transport – Highways	
Organisation	Summary of representation(s)
Hockley Residents Association	<p>Concern expressed that costing and funding for infrastructure improvements have not been considered, and that there are no plans to address how to cope with the extra traffic.</p> <p>Suggests that infrastructure cost must be identified before allocating sites to avoid hurdles in the future, i.e. insufficient government funding.</p>

Transport – Public Transport	
Organisation	Summary of representation(s)
Hockley Parish Plan Group	Suggests that public transport must be improved in and around Hockley to support the additional population and to alleviate the impact of additional traffic volumes.
Hockley Residents Association	<p>Concern expressed that the public transport service is being cut whilst the Council is advocating the use of environmentally friendly transport. No information is given on how new services will be provided.</p> <p>Suggests that small, scattered housing developments do not generate sufficient additional traffic to cost justify additional bus services.</p>

Transport – South Essex Rapid Transport (SERT)	
Organisation	Summary of representation(s)
Hockley Residents Association	Suggests infrastructure improvements need to be in place before extra housing.

Transport – Cycling and Walking	
Organisation	Summary of representation(s)
Hockley Parish Plan Group	Suggests that improved highways and cycle networks are essential in and around Hockley to support all the increased traffic volumes, improve road safety, and eliminate congestion.

Hockley Residents Association	<p>Supports more cycle ways but do not believe the existing infrastructure can cope with the proposed plan.</p> <p>Also expresses concern regarding costing issues and land availability.</p>
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Transport – Greenways	
Organisation	Summary of representation(s)
Hockley Residents Association	Suggests that development along Rectory Road will result in the coalescence of settlements with no greenway.
Renaissance Southend	<p>Suggests that reference should be made to the Thames Gateway Parklands Vision published by CLG with particular regard to new open space opportunities for Rochford District.</p> <p>Is keen to explore opportunities for creating access to existing and new open/green spaces in both Southend and Rochford for the benefit of the two councils' residents and visitors.</p> <p>Highlights that Southend Council has proposed a new country park with potential links with land in the Rochford District. Scoping work is currently underway, looking at the opportunities for creating new space and improving linkages between built up areas and open space in both Southend and Rochford.</p>

Preferred Option T1 – Highways	
Organisation	Summary of representation(s)
Hockley Parish Plan Group	<p>Feels that the infrastructure in the district is already stretched and cannot cope with the increased population and traffic.</p> <p>Concern expressed that there are no details on costing or how infrastructure will be implemented. Scattered housing developments will be difficult to generate sufficient pay from the developers to incorporate for new infrastructure.</p> <p>Believes that unless significant highways development is introduced, congestion (especially in Hockley) will only get worse when the additional traffic caused by new housing and the airport join the road.</p> <p>There is a cut in bus services while extra services will be needed to support the additional population</p>

	<p>in the area. Suggests that the Council form an agreement with Arriva to make the Strategy viable.</p> <p>Lack of cycling networks and car parking spaces are also problems. Suggests that exits from the car parks in Spa Road are hazardous, additional and safer car parking is essential to support proposed additional traffic.</p>
Hockley Residents Association	Suggests that the B1013 is at ¾ capacities but there is no alternative for the use of private cars as the bus only runs every hour. In addition, there is no information on how B1013 will be enhanced.
Essex Chambers of Commerce	Suggests that the existing levels of congestion are unacceptable, and therefore it is important to have a further provision to cope with the extra traffic generated by the additional housing and employment, and improvements in highway infrastructure will be required for the efficient movement of goods and services, especially the east-west route linking Rochford east to the A130/A127.
Rochford Chamber of Trade	Suggests that the concept of T1 is sound, but the plan will need more than developers' contributions (S106) to be achieved.

Preferred Option T2 – Public Transport

Organisation	Summary of representation(s)
Hockley Residents Association	<p>Expressed concern that the bus services are being cut and there is no information on how new services will be provided. The lack of public transport in the district will result in increased use of private cars.</p> <p>Suggests that small, scattered housing developments do not generate sufficient additional traffic to economically justify additional bus services.</p>

Preferred Option T5 – Cycling and Walking

Organisation	Summary of representation(s)
Hockley Residents Association	Concern expressed regarding the costing and sustainability of building footpaths in the rural areas.
Sustrans	<p>Supports the principles of T5 and agrees with the proposed route shown in the key diagram.</p> <p>Is keen to work closely with the stakeholders on developing routes and convenient links between local amenities to reduce reliance on the car, particularly for short journey, and to get good</p>

	layouts/ find a solution to encourage sustainable developments at the planning stage.
Natural England	Supports T5. Footpaths and cycleways should be provided as part of new development layouts which will contribute to sustainable transport and also provide informal recreation opportunities to help improve the health and well-being of residents.
Renaissance Southend	Welcomes the aspirations and vision for Rochford District, with particular reference to the promotion of the District's green character and opportunities for creating good walking and cycling links between Southend and Rochford.

Summary of NGO Comments on the Retail and Town Centres Chapter

Retail and Town Centres – Retail	
Organisation	Summary of representation(s)
Hockley Residents Association	<p>Suggests that the Council should consider the impact of people’s changed shopping habits (e.g. increased use of supermarket, empty shops).</p> <p>Suggests that the Council should take into consideration that some proposed residential developments are far from the retail development locations and do not have public transport.</p>
SE Essex Organic Gardens	Suggests that the Council should consider using the Sustainable Communities Act to provide a channel for local people to promote sustainability of their area.

Retail and Town Centres – Village and Neighbourhood Shops	
Organisation	Summary of representation(s)
SE Essex Organic Gardeners	Suggests that the Council should consider using the Sustainable Communities Act to provide a channel for local people to promote sustainability of their area.

Retail and Town Centres – Rayleigh Town Centre	
Organisation	Summary of representation(s)
Mr Edward Byford - Rayleigh Chamber of Trade	<p>Made five suggestions for Rayleigh Town Centre:</p> <ul style="list-style-type: none"> • keep the car parking charges reasonable • use signage to divert traffic from major roads to non local traffic routes • a large number of shops should remain as retail use • communicate with neighbouring authorities on major retail planning applications • pedestrianise part of the High Street.

Retail and Town Centres – Hockley Town Centre	
Organisation	Summary of representation(s)
Hockley Parish Plan Group	Hockley town centre development must maintain the character of Hockley, include a variety of amenities, and consider appropriate facilities for people with disabilities.
Hockley Residents Association	Suggests that the Hockley AAP will have a major impact (including housing) on Hockley, but it is not possible to comment on the combined impact of the Core Strategy and the Hockley AAP until both have been published.

Preferred Option RTC1 – Retail	
Organisation	Summary of representation(s)
Hockley Residents Association	Suggests that the Hockley AAP will have a major impact (including housing) on Hockley, but it is not possible to comment on the combined impact of the Core Strategy and the Hockley AAP until both have been published.
Essex Chambers of Commerce	Supports RTC 1.
Federation of Small Businesses	Suggests that the three main retail centres are having a challenging time and looking at returning to small centres to adopt a similar style of small retail outlets could form a micro community and help retain the spending within the district. For instance, new residential developments should include local shops and it will benefit the local economy if more on-street drop by parking/ pedestrian walkways areas is provided.
The Theatres Trust	<p>Would expect to see other town centre uses mentioned in this section which is in accordance with PPS6 and some findings regarding the leisure offer from the Retail and Leisure Study.</p> <p>Suggests that the Council should remove any general reference to town centres from this section as policy RTC1 only refers to their retail element.</p>

Preferred Option RTC2 – Village and Neighbourhood Shops	
Organisation	Summary of representation(s)
Essex Chambers of Commerce	Supports RTC2.

Preferred Option RTC3 – Rayleigh Town Centre	
Organisation	Summary of representation(s)
Essex Chambers of Commerce	Supports RTC3.
The Theatres Trust	Suggests that no mention is made of any other shortcomings apart from those issues identified in the Retail and Leisure Study.

Retail and Town Centres – Hockley Town Centre	
Organisation	Summary of representation(s)
Rochford Chamber of Trade	<p>Will stay neutral until the Area Action Plan is published.</p> <p>Suggests that the profile of Rochford need to be raised in order to attract trades to improve the economy.</p>

Summary of NGO Comments on the Character of Place Chapter

Preferred Option CP1 – Design	
Organisation	Summary of representation(s)
Natural England	Supports CP1. Recommends that the Council should consider the use of policies to promote the delivery, long-term management and maintenance of greenspace and green linkages that meet local requirements and provide links between people and wildlife.

Summary of NGO Comments on the Community Infrastructure, Leisure and Tourism Chapter

Community Infrastructure, Leisure and Tourism – Introduction	
Organisation	Summary of representation(s)
Hockley Parish Plan Group	Suggests that the plan is not sustainable due to the insufficient infrastructure proposed in and around Hockley. Highway networks would be the major problem as roads through Hockley already suffer from heavy congestion.

Community Infrastructure, Leisure and Tourism – Education	
Organisation	Summary of representation(s)
Hockley Residents Association	Assume that the majority of additional children from surrounding areas will go to schools in Hockley, but no mention is made of the impact on schools in the area.

Community Infrastructure, Leisure and Tourism – Healthcare	
Organisation	Summary of representation(s)
Hockley Parish Plan Group	Increased population in Hockley and its neighbouring parishes must be supported by additional infrastructure (e.g. healthcare, schools, community services, and leisure facilities.).

Community Infrastructure, Leisure and Tourism – Tourism	
Organisation	Summary of representation(s)
Federation of Small Businesses	Suggests that if the ideals of the tourism initiative are implanted into the district, there will be a need to change planning policy to accept tourism development. Cheap but adequate accommodation within the newly developed countryside, and suitable hotel accommodation in the west of the district to cover the proposed new industrial area, will be needed.
Renaissance Southend	<p>Recognises Rochford District's tourism potential and would seek to ensure that there are sustainable transport links between Southend and Rochford to realise this. Potential for such links are being explored in scoping work for the proposed 'new country park' for Southend.</p> <p>Supports proposals for Wallasea Island and would seek to improve sustainable links between Southend Borough and Wallasea Island where this is possible.</p>

CLT Appendix 1	
Organisation	Summary of representation(s)
Hockley Residents Association	Feels that the proposal is unsustainable - no indication is given of likely levels of standard charges or how cross-parish enhancements will be paid for (as Standard Charges will be linked to specific developments).

Preferred Option CLT 1 – Planning Obligations and Standard Charges	
Organisation	Summary of representation(s)
Hockley Residents Association	No detail is given on Standard Charges. It is doubtful if the developers can fulfil their obligation in accordance with the Government's indicative figures in the current economic climate.
Essex Chambers of Commerce	Concern expressed that the Standard Charges will not be sufficient to contribute to any strategic highway improvements within Rochford District which will be needed to cope with the traffic generation resulting from the intended growth in housing and jobs.
Natural England	Suggest that countryside recreation projects should be included in the list of activities that planning obligations and charges could contribute to.
The Theatres Trust	Support CLT1 which shows an overall approach to developer contributions with appropriate references to strategic sites and clear links to the details set out in an accompanying SPD.

Preferred Option CLT2 – Primary Education, Early Years and Childcare Facilities	
Organisation	Summary of representation(s)
Hockley Parish Plan Group	There are no proposals to accommodate additional primary and secondary school places in Hockley/Hawkwell. Assuming that the majority of additional children from surrounding areas will go to Westerings School in Hockley, where the roads are very narrow and hazardous, without major improvements to the road networks, the increased cars will undoubtedly cause havoc and lead to accidents.

Preferred Option CLT4 – Healthcare	
Organisation	Summary of representation(s)
Hockley Residents Association	No improvements are recommended for the Rochford area which has the worst GP/ patient ratio in SE Essex and the most houses proposed.

Preferred Option CLT5 – Open Space	
Organisation	Summary of representation(s)
SE Essex Organic Gardeners	<p>Quoted and summarised the petition the government received last year - The provision of allotments is the responsibility of local authorities. Under existing legislation there is a duty on local authorities to provide allotments where they perceive there is a demand for them in their area.</p> <p>If an allotment authority is of the opinion that there is a demand for allotments in its area, it is required, under Section 23 of the Small Holdings and Allotments Act 1908, to provide a sufficient number of allotments and to let them to persons residing in its area who want them.</p>
Natural England	<p>Supports CLT5. Would like the policy to expand in greater detail and emphasise that all development should incorporate sufficient new greenspace in accordance with Natural England's Natural Green Space Standards of achieving natural greenspace within 300m of every home and how open spaces could be improved and enhanced and linked to green infrastructure.</p> <p>It is also recommended that opportunities should be taken to improve the biodiversity and amenity value of the greenspace areas by suitable planting with native species. Introducing footpaths or cycleways through these areas would also increase the provision of informal recreation and contribute to sustainable transport measures.</p>

Preferred Option CLT6 – Community Facilities	
Organisation	Summary of representation(s)
Hockley Residents Association	No information is given on how extra youth facilities will be paid for as 12 housing sites scattered across the district does not provide sufficient scale to pay for the facilities.

Preferred Option CLT9 – Leisure Facilities	
Organisation	Summary of representation(s)
Hockley Residents Association	No information is given on how leisure facilities will be paid for while Standard Charges from 12 housing sites scattered across the district do not provide cross-parish facilities.
The Theatres Trust	Feels that the Retail and Leisure Study should be mentioned in this section and the policy should not only focus on sport and recreation through leisure centres.

	Suggests that arts facilities should be included in the text and within the policy and the title of this section should be amended to 'Arts and Leisure Facilities' for continuity and clarity. The policy should ensure that the Council's existing arts and leisure facilities are promoted and protected as the wording of policies determine whether or not development can take place.
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Preferred Option CLT10 – Playing Pitches

Organisation	Summary of representation(s)
Hawkwell Athletic FC	<p>The Core Strategy has not identified new pitches in Hockley and does not say what is intended for the existing sites. For example, 2 mini soccer pitches can be created if the Council could flatten the ground near the skate board ramp at Clements Hall.</p> <p>With the influx of the new families, there will be more teams created in the future but the Council do not seem to be designating any extra pitches in the Hockley area. To build the mini soccer pitches at Clements Hall would help to ensure more children play sport in the local area and do not hang around the streets as they do today.</p> <p>Disappointed expressed with the Council's decision of rejecting the planning proposal last year (for toilet and changing facilities at Apex to be used by Greensward Academy) while the Preferred Option stated additional playing pitches will be considered appropriate in meeting certain circumstances.</p>

Preferred Option CLT11 – Tourism

Organisation	Summary of representation(s)
Natural England	Supports CLT11. Suggest that it should be mentioned in the policy wording that this approach is consistent with the objectives of the Thames Gateway South Essex Greengrid. Also, the conversion of rural buildings could involve damage to protected species and this should be mentioned in the explanatory text.
The Theatres Trust	The preferred options have not include the aspiration 'the district has the potential to be the arts and cultural opportunities area for the sub-region' which is stated in the main text. Finds that the content of some relevant strategies are missing, and there is no mention of cultural facilities in any preferred options.

Summary of NGO Comments on the Upper Roach Valley and Wallasea Island Chapter

The Upper Roach Valley and Wallasea Island – Upper Roach Valley	
Organisation	Summary of representation(s)
Federation of Small Businesses	<p>Suggests that the Core Strategy does not cover the future of the Roach and its tributaries from the aspect of the existing users of the river, i.e. illegal waterside development, house boats, live a board's, waterside constructions.</p> <p>Suggest that there is a need to open up public access to the riverside.</p>
Renaissance Southend	<p>Supports the aim of creating more informal green space.</p> <p>Would seek to work closely with Rochford and other stakeholders to identify specific opportunities to achieve this.</p>

Preferred Option URV1 – Upper Roach Valley	
Organisation	Summary of representation(s)
Natural England	<p>Supports URV1 as well as the expansion of the Country Park. This provides an opportunity to link this area with the wider green infrastructure network and improve access to the countryside from surrounding areas.</p> <p>Suggests, however, that the policy is reworded from: 'minimum of interference' to 'appropriate management', as presently set out may not in fact 'permit certain flora and fauna to flourish'.</p>

Alternative Option URV1 – Upper Roach Valley	
Organisation	Summary of representation(s)
SE Essex Organic Gardeners	Object due to loss of farmland and enormous infilling of soil which they believe may be contaminated.

Preferred Option URV2 – Wallasea Island	
Organisation	Summary of representation(s)
Essex Chamber of Commerce	Suggests that significant highway and access improvements to Wallasea Island are essential to cope with both construction and visitor traffic for the RSPB project.
Natural England	Supports URV2 but would suggest the policy is reworded from: "no adverse impacts" to "provide any adverse ecological impacts are avoided, mitigated, or compensated for."

Rochford Chamber of Trade	Support the RSPB project, but they should ensure that S106 agreements are in consent to provide adequate facilities for visitors and infrastructure improvements for the site.
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Appendix 2c – Representations from the General Public

Summary of Public Comments on the Introduction

Characteristics, Issues and Opportunities
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Concern was raised as to why we need to build in our area, and that the public should be listened to.

Vision

Concern was expressed over meeting the Council's aim.

Summary of Public Comments on the Housing Chapter

Housing Introduction

The majority of responses were objections. Concern was expressed that the document is too big making it hard to circulate and that the document should be reviewed in light of the current economic climate. Suggestion that all residents should have received a letter about the consultation and that it should have been publicised more. Suggestion that housing demand is actually lower than estimated because of the below average prices of property in Rochford compared to Essex as a whole. Concern was raised regarding the next stage in the process, further consultation opportunities, how the responses will be published, and how views will affect policies. Concern was expressed over the housing numbers and that the population out-migrate due to overdevelopment rather than as a result of housing shortages, the demographic assumption is wrong, and concern was expressed that some housing developments are inappropriate for the local population. Concern was expressed that the elderly, which are assumed to be causing population growth, are little considered in the housing strategy.

Distribution

The majority of responses were objections. Concern was raised over losing the identity of Hockley, increasing pressure on infrastructure from development, current congestion on the roads and the reduced bus service. Concern was expressed regarding development throughout the District, the increased pressure on existing infrastructure, and concern over the numbers proposed for west Rayleigh/Rawreth which has already been developed a lot and the increasing traffic congestion. Concern was raised over the spread of proposed development (small sites) which would limit planning obligations and increase pressure on infrastructure, and the suggestion of proposed housing in one new settlement. Concern was expressed regarding green belt release coupled with town cramming, and concern over the impact of town cramming already implemented, particularly in Hockley. Concern was expressed over town cramming and the use of green belt only in areas where infrastructure is sufficient.

Preferred Option H1 – Distribution

The majority of responses were objections. Suggestion that there should be no more development - the focus should be on existing residents and recognition of the need to allocate areas for development due to inadequate brownfield sites. Concern was expressed over the distribution across the settlements, coalescence between Great Wakering and Shoebury, the use of green belt in Rayleigh as opposed to brownfield sites, the identified tiers of settlements, the lack of costing provided and the financing of scattered developments. Concern was also expressed over the naming of 'North of London Road, Rayleigh', the share of development proposed in Rayleigh, the current congestion in the town centre, the use of agricultural land and the impact on congestion and roads. Suggested intensification in smaller settlements with traditional housing. Support of urban extensions and mixed developments, in particular, development to the north of Rayleigh.

Alternative Options H1 – Distribution

Concern was expressed that development should be on brownfield sites, better services and facilities are needed now, and the road and rail networks are already congested. Concern was expressed that housing in Hawkwell should be spread throughout the village rather than in one place, and concern was expressed over the increasing pressure on infrastructure. Concern was expressed that there is no clear explanation of the 'alternative uses' in the first alternative option, the alternative options conflict, and that cramming would be more noticeable with the intensification of smaller settlements.

General Locations

Suggestion that there should be no housing in Hawkwell. Concern was raised over the distribution of development in Hawkwell, the housing numbers in Hawkwell/Ashingdon/Hockley/Rochford, and the impact on roads in Hockley, the B1013, Ashingdon Road and Lower Road. Suggestion that development is more suitable in the west/northwest of the District and that the town or parish should be stated in the tier 4 category. Concern expressed that tier 4 settlements are suffering from closed facilities such as schools because extra housing is considered unsustainable. Concern was raised over large developments in Hockley, and the loss of green belt and woodlands to the west. Concern was expressed that the document can not be read in conjunction with the JAAP, Allocations document etc. and concern that all interested parties should be consulted. Suggestion that infrastructure is key, and that the council should consult other councils etc. to resolve problems. Concern expressed that the use of brownfield sites can result in town cramming and loss of open space, concern was raised over the relationship with Southend and Chelmsford/Basildon, and concern expressed that residential development displacing employment use will result in intensification.

Preferred Option H2 – General Locations and Phasing**References to Hawkwell**

The majority of responses were objections from Hawkwell residents. Concern expressed regarding infrastructure (such as local schools, doctors, leisure and recreation facilities etc.) – both the pressure on current services and facilities and future provision, and concern that no increased school provision has been proposed in Hawkwell or Hockley. Concern was raised over the impact of increased traffic and travelling times on the roads through Hawkwell such as Main Road, and congestion at the junction on Rectory Road and the railway bridge, the decreasing bus service and the impact of developing the airport. Concern was raised over the creation of a sprawling urban area from Hockley to Ashingdon, the impact on flooding, the negative impact on the local area, residents and wildlife, and the loss of the village feel. Comments state that the green belt should not be built on, Hawkwell has no railway station and more housing should be proposed for Hockley because it has better infrastructure, and concern was expressed regarding the naming of the general proposed area as South Hawkwell. It was highlighted that other brownfield sites should be considered such as Magees Nursery or the small industrial estate along Thorpe Road.

References to Hockley

Concern was raised over the lack of current infrastructure such as schools, current traffic congestion on main routes such as the Hockley Spa junction (particularly from development in the surrounding areas) and the future impact, and poor public transport. Suggestion that more schools are needed in Hockley. Concern was raised over the creation of a sprawling urban area from Hockley to Ashingdon, the loss of green belt and agricultural land, and concern regarding crime and antisocial behaviour.

References to Hullbridge

Suggestion that more housing should be proposed in Hullbridge pre 2015 to relieve the pressure on other areas, and phasing the housing over the whole plan period rather than in one block. Concern was raised over the limited infrastructure, in particular roads, and concern regarding the coalescence of Rayleigh with Hullbridge.

References to Rayleigh/Rawreth

The majority of responses were objections from Rayleigh/Rawreth residents. Concern was raised over the traffic along the main road from Rayleigh to Hockley, the loss of agricultural land and green belt, the limited public transport, traffic congestion along Rawreth Lane, London Road and in the town centre and the increased pressure on infrastructure from development. Concern was also expressed regarding the impact on the character, landscape and topography in southwest Rayleigh. Support for development in London Road, Rayleigh, and the suggestion of development around the 'Rayleigh Park Estate'. Concern was expressed that Rayleigh has been developed a lot over the last 10 or 20 years and should not take anymore, and Hullbridge and other settlements should share some more of Rayleigh's proposed housing development. Concern was expressed over the coalescence between Rayleigh and Wickford etc, between Rayleigh and other settlements in the District and the phasing of development. Concern was raised over the names used to designate general areas, as Rayleigh and Hullbridge are within the Parish of Rawreth. Suggestion that although land 'north of London Road' and 'west of Hullbridge' are within the Rawreth Parish, they are separate from Rawreth village and so residents will consider themselves either Rayleigh or Hullbridge residents.

References to Canewdon

Concern was expressed over the lack of infrastructure and services, the impact on surrounding areas such as the Ashingdon Road, where the housing is going to be located and concerns regarding the access of lorries/HGVs etc into the village. Suggestion that development should occur south of Anchor Lane.

References to Rochford/Ashingdon

Concern was raised over the increasing pressure on roads e.g. Ashingdon Road and current infrastructure, the lack of public transport and schools, and the coalescence with surrounding settlements. Concern was expressed regarding the loss of green belt around the fringe of settlements. Support of the proposed expansion of King Edmund, a new primary school in West

Rochford and youth facilities.

References to Great Wakering

Reference to the proposed multiagency centre in Great Wakering.

General Responses

Generally there was concern expressed over the current pressure on local roads throughout the District, and further pressure as a result of development, the current and increasing pressure on other infrastructure such as doctors, dentists and schools and that there was no costing for infrastructure. Concern was raised over the declining bus service, the tier of settlements, lack of mention regarding road improvements, loss of green belt, and the impact on the local population and wildlife. Concern over the current economic climate, the spread of proposed development, the lack of awareness of proposals and consultation, and the types of housing to be built. Suggestion of putting all the new housing in a single new location and a new 'relief road'.

Alternative Options H2 – General Locations and Phasing

Suggestion that the document should consider the possibility of a Fossetts Farm/Bournes Green development, and that larger towns should take more development, for example Southend has more brownfield sites. Concern was expressed that development within smaller settlements will also harm their character, not just larger settlements, development 'North of London Road' would reduce the green belt between Rayleigh and Wickford and the landscape value and increase traffic and congestion. Concern was also raised that development in southwest Rayleigh will affect the topography, views and landscape value of the area, and it will increase pressure on infrastructure, green belt will be lost and there is poor accessibility. Suggestion that in Rayleigh, smaller developments rather than a single large development should be considered. Concern raised that all of the general alternative areas are located away from services and facilities, not just 'North Ashingdon', which is serviced by public transport, is close to schools, and the land already has housing around it. Suggestion that all development should be in one new location to the west of Rochford. Suggestion that northeast Hockley is considered inappropriate because of traffic and congestion but South Hawkwell is also inappropriate because of increased traffic on the B1013 as a result of Cherry Orchard Way etc.

General Locations Post 2021

Concern expressed that firm proposals for post 2021 should be made and that all development should be in one new location to the west of Rochford.

Preferred Option H3 – General Locations Post-2021

Concern was expressed over the impact of additional traffic from development in Canewdon e.g. along the Ashingdon Road, regarding access of lorries/HGVs etc. into the village, and the lack of infrastructure and services. Concern was expressed over providing infrastructure alongside housing developments, particularly in the current economic climate and concern that 'South Hawkwell' is too vague. Suggestion that development prior to 2021

should take place south of Anchor Lane, Canewdon,

Alternative Options H3 – General Locations Post-2021

Concern was expressed as to how this is an alternative option.

Affordable Housing

Concern was raised over the viability of affordable housing in the current economic climate and given that property values are considered high. Suggestion that there should be more affordable housing and concern expressed over the current shortage.

Preferred Option H4 – Affordable Housing

Concern was raised that there should be minimal development in Hockley, but development should include affordable housing. Concern expressed that the right balance between affordable housing and large developments is needed, housing should be in-keeping with the current character, it should not be situated in a single location and should be mixed into developments with intermediate, key worker and market housing. Suggestion that Section 106 agreements should be used to provide infrastructure improvements. Concern was raised over the realistic affordability of affordable housing and their viability in the context of the current economic climate. Concern was expressed that affordable housing should be required within fewer than 15 units, and that the policy does not ensure provision for the government's target figure of 65% socially rented housing.

Dwelling Types

Concern was expressed that affordable housing should be for local people. Concern was also raised over the character, scale and density of new developments.

Preferred Option H5 – Dwelling Types

Concern was expressed over the concentration and character of dwellings, the use of planning contributions, and the development of houses as opposed to flats.

Preferred Option H6 – Lifetime Homes

Lifetime Homes is supported.

Gypsy and Traveller Accommodation

Concern expressed over the designation of sites particularly illegal sites, and concern over the management of sites and other issues.

Preferred Option H7 – Gypsy and Traveller Accommodation

Mostly objections. Concern was expressed over the designation of illegal sites which are inappropriately located and the large number of sites proposed.

Alternative Options H7 – Gypsy and Traveller Accommodation

Concern was expressed over the provision of sites.

H Appendix 1

Mostly objections. Concern was expressed regarding drainage and flooding particularly in Rayleigh and the lack of reference to improving roads in Rayleigh. Concern was raised over the use of general locations in determining infrastructure requirements and costing, the lack of healthcare provision other than in Rayleigh, lack of infrastructure for Hockley, the definition of sustainability and the provision of public open space.

Summary of Public Comments on the Green Belt Chapter

Protection of the Green Belt

Concern was raised over further development, the quality of life of residents, overpopulation and overcrowding, loss of greenbelt, the future appeal of the area, and the location of proposed development. Concern was expressed that development proposed in H2 is against this policy and PPG2, how greenbelt is redesignated and how development on the released land will be controlled.

Preferred Option GB1 – Green Belt Protection

Concern was raised regarding the retention of the identity and greenspaces of Hockley, loss of green belt with particular reference to Hockley, southwest Rayleigh, north of London Road and southwest Hullbridge, the impact on the topography, landscape value and view of southwest Rayleigh. Concern was expressed regarding the consideration of alternative sites, the impact on farmers and local agriculture, concern regarding green belt use over alternative brownfield sites in west Rayleigh, scattering of proposed development, the percentage of development proposed on greenbelt, the coalescence of settlements, the location of proposed development to existing centres, inadequate open space in southwest Rayleigh, and the impact on congestion, wildlife, the water table and pollution. Concern was raised over the use of agricultural land, lack of proposed road improvements, the problem of congestion concentrated in one area (e.g. north of London Road), current congestion, use of other brownfield and residential sites, and concern was expressed over the appropriateness of different sites in the 'call for sites'.

Rural Diversification, Green Tourism and Recreational Uses

Concern was expressed over the development of green belt in Rayleigh.

Preferred Option GB2 – Rural Diversification and Recreational Uses

Concern was expressed regarding easy development opportunities for developers through use of the greenbelt, and reference to Lubbarbs Lodge Farm, where the policy would provide an opportunity to sustainably redevelop some of the existing buildings.

Alternative Options GB2 – Rural Diversification and Recreational Uses

Agreement with the objections to the alternative option.

Summary of Public Comments on the Economic Development Chapter

Introduction

Concern was expressed regarding proposed development in the north whereas the airport development is in the southeast, the closure of Rochford Hospital, and the development of jobs at the airport.

London Southend Airport and Environs

Concern was raised over increased pollution and traffic in Hockley, the long term and short term impact of airport development and road and other infrastructure improvements.

Preferred Option ED1 – London Southend Airport

Concern was raised regarding developing the airport to its full potential, concern over the use of green belt, and the general impact of airport development such as pollution and congestion.

Employment Growth

Concern was expressed regarding empty factories.

Preferred Option ED2 – Employment Growth

Concern was expressed over attracting more employment opportunities to the area, the demand for employment sites and the relocation of Rawreth Industrial Estate.

Preferred Option ED3 – Existing Employment Land

Concern was raised over the relocation of Rawreth Industrial Estate.

Preferred Option ED4 – Future Employment Allocations

Majority object. Concern was raised over the proposed relocation of Rawreth Industrial Estate, the loss of green belt, and the visual impact. Alternative locations are suggested.

Summary of Public Comments on the Environmental Issues Chapter

Introduction

Concern over pollution, traffic congestion, the reduced bus service, and the impact on wildlife.

Protection and Enhancement of the Natural Landscape and Habitats

Concern was raised over the biodiversity of brownfield sites and the omission of gardens from the policy.

Preferred Option ENV1 – Protection and Enhancement of the Natural Landscape and Habitats

Majority support. Concern was expressed regarding the inclusion of greenspace in developments and no mention of 'protection' in the policy.

Local Wildlife Sites (LoWSs)

Concern was expressed regarding biodiversity of land in southwest Rayleigh, land at Shoebury Ranges, and concern over the absence of local nature reserves.

Sites of Special Scientific Interest (SSSIs)

Concern was expressed regarding the value of SSSIs and no mention of natural habitats.

Crouch and Roach

Concern was raised over mitigating the impact of uses.

Special Protection Areas (SPAs)

The policy is supported.

Special Areas of Conservation (SACs)

The policy is supported.

Preferred Option ENV2 – Coastal Protection Belt

Majority support. Concern was raised over the implementation and enforcement of the policy.

Flood Risk

Concern was raised over flooding and drainage.

Preferred Option ENV3 – Flood Risk

Concern was expressed regarding the flooding of Rawreth Lane and land referred to as 'North of London Road', and directing development away from medium/high flood risk areas is supported.

Preferred Option ENV4 – Sustainable Drainage Systems (SUDS)

Concern was expressed over the flooding of land to the 'North of London Road'.

Air Quality Management Areas

Concern was expressed over the impact of Southend airport development and the decreasing bus service on air quality.

Preferred Option ENV5 – Air Quality

Concern was expressed over the impact of Southend airport development on air quality.

Renewable Energy

Concern was expressed over energy consumption, wind turbines and the efficiency of housing.

Preferred Option ENV6 – Large Scale Renewable Energy Projects

Concern was expressed over large scale projects and whether the policy applies to waste incinerators and their associated impacts.

Preferred Option ENV7 – Small Scale Renewable Energy Projects

General support of small scale projects.

Preferred Option ENV8 – Code for Sustainable Homes

Suggestion that a higher standard should be required.

Preferred Option ENV9 – BREEAM

Suggestion that all public buildings should achieve a minimum rating of 'excellent'.

Preferred Option ENV10 – Contaminated Land

Concern was expressed regarding contaminated sites at Rawreth Industrial Estate.

Summary of Public Comments on the Transport Chapter

Introduction

Concern was expressed over the increase in traffic and congestion throughout the District, the impact of decreased public transport and car parking issues. Concern was raised regarding airport development and lack of reference to lorries and vans in the policy. Concern was expressed over the general impact on infrastructure of development and concern over the lack of costing and identified funding for infrastructure improvements/additions.

Highways

Concern was expressed over infrastructure improvements, particularly in Hockley.

Preferred Option T1 – Highways

Concern was expressed over implementing highways improvements before development, the lack of proposed road improvements to Hawkwell/Hockley, the impact of further development on roads and green belt. Concern was raised regarding the declining public transport service, impact of increased traffic in Rayleigh and safety concerns particularly around schools (Rayleigh Primary). Support for improving east to west connections and Baltic Wharf access road. Suggestion that it conflicts with H2.

Public Transport

Concern was expressed over the declining public transport service, pollution, and the location of proposed sites away from railway stations. Suggestion of a park and ride scheme and local bus services into Hockley town centre from outlying housing estates.

Preferred Option T2 – Public Transport

Concern was expressed over the declining public transport service throughout the District, the location of housing on or near public transport routes and lack of emphasis on improving the railway service. Suggestion that improved highways and cycle networks particularly in Hockley are needed and suggestion that it conflicts with H2.

Preferred Option T3 – South Essex Rapid Transport (SERT)

One support for the scheme.

Preferred Option T4 – Travel Plans

Concern was expressed over the development of the airport.

Cycling and Walking

Concern was raised over the costing of cycle and footpaths.

Preferred Option T5 – Cycling and Walking

Concern was expressed over the costing, detail and implementation of the cycle and footpaths. Particular concern was raised with regards to Watery Lane and Rawreth Lane.

Greenways

Suggestion that the sustrans route should be open to all users, not just cyclists.
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Preferred Option T6 – Greenways
--

Concern was expressed over road safety in some areas such as Barling Road, lack of proposed parking facilities, the bus service, the use of the greenway by pedestrians, cyclists and horses and the safety implications of this.

Parking Standards

Concern was expressed over applying minimum requirements and parking in Hockley.
--

Preferred Option T7 – Parking Standards
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Concern was raised over parking charges, people using out of town shopping centres and the implementation of off street parking for all developments.

Summary of Public Comments on the Retail and Town Centres Chapter

Retail

Concern was expressed regarding the location of proposed sites away from town centres, loss of character, Hockley town centre regeneration and empty shops. Suggestion that leakage out of the District cannot be changed – Hockley and Hawkwell for example serve day-to-day needs.

Preferred Option RTC1 – Retail

Suggestion that town centres should be renovated rather than increased and suggestion that big stores should be resisted.

Preferred Option RTC2 – Village and Neighbourhood Shops

Local shops are a vital asset to the disabled and elderly.

Preferred Option RTC3 – Rayleigh Town Centre

The policy is supported.

Alternative Options RTC3 – Rayleigh Town Centre

Suggestion of development along Websters Way, Rayleigh.

Preferred Option RTC4 – Rochford Town Centre

Suggestion that Rochford town centre should be renovated rather than increased.

Hockley Town Centre

Concern was expressed over increasing rents, loss of shops, too many restaurants/takeaways, lack of supermarket competition and concern over the impact of the Town Centre Masterplan.

Preferred Option RTC5 – Hockley Town Centre

Concern expressed regarding the retention of Hockley's character. Suggested development of shops, parking and youth facilities etc. in the town centre, but concern that Eldon Way should not provide additional retail opportunities.

Summary of Public Comments on the Character of Place Chapter

Introduction

Concern was raised over the character of Hockley.

Design

Concern was expressed over the erosion of character.
--

Preferred Option CP1 – Design

Concern was expressed regarding the lack of high standard of architectural quality throughout the District and concern that new developments should respect local character.
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Preferred Option CP2 – Conservation Areas
--

Concern was expressed regarding the access of lorries/HGVs etc into the village and conservation area of Canewdon.
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Local Lists

Concern was expressed regarding the previous abolition of the Local List and the impact on loss of heritage buildings, particularly in Hockley.

Preferred Option CP3 – Local List
--

Support for the policy and raising awareness of locally important buildings.
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Summary of Public Comments on the Community Infrastructure, Leisure and Tourism Chapter

Introduction

Concern was raised regarding increasing infrastructure that will be needed with development such as healthcare particularly in Hockley/Rochford/Rayleigh, a swimming pool in Rayleigh, and more local post offices.

Planning Obligations and the Standard Charges

Concern was expressed over the costing and delivery of infrastructure.

Preferred Option CLT1 – Planning Obligations and Standard Charges

Concern over the lack of detail regarding the acquisition and distribution of standard charges.

Education

Concern was expressed regarding increased class sizes in schools and parking outside schools particularly in Hockley, and the impact of the reduced bus service.

Preferred Option CLT2 – Primary Education, Early Years and Childcare Facilities

Concern was raised over appropriate future school provision in Rayleigh, and the design of new primary schools.

Preferred Option CLT3 – Secondary Education

Agreement with the proposed expansion of King Edmund School.

Healthcare

Concern was raised over limited healthcare and lack of additional provision in Hockley/Rochford and provision for the over 60's.

Preferred Option CLT4 – Healthcare

Concern was expressed regarding current healthcare provision in Hockley, the decreased bus service to Southend hospital, the impact on health from development and general accessibility to healthcare for all the population. Concern was raised with particular regard to a peripheral healthcare centre alongside development to the 'North of London Road'.

Preferred Option CLT5 – Open Space

Concern was expressed that provision should not result in a loss of green belt or increased development in west Rayleigh/ Rawreth.

Community Facilities

Concern was expressed over lack of detail regarding provision and funding, and the use of standard charges.

Play Space

Concern was expressed over the playgrounds in Great Wakering which are

often closed.

Preferred Option CLT7 – Play Space

Majority support. Suggestion that gardens are essential and with communal play space as proposed, children would need to be escorted.

Youth Facilities

Concern was raised regarding the feasibility of provision considering the proposed 'scattered development' and emphasis on provision for youths.

Preferred Option CLT9 – Leisure Facilities

Concern was expressed over the current demand for leisure facilities and the need for additional facilities such as swimming pools and concern over the external appearance of Raleigh Leisure Centre.

Summary of Public Comments on the Upper Roach Valley and Wallasea Island Chapter

Preferred Option URV1 – Upper Roach Valley

Support for the policy. Comment on extending the Country Park up to the boundary of the B1013 and support for linking the Park to Hockley Woods.
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Alternative Options URV1 – Upper Roach Valley
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Suggestion that the area must be open and accessible to everyone.

Policy - Preferred Option URV2 – Wallasea Island

Objections to increasing the recreational opportunities on Wallasea Island and some support of the policy. Suggestion that the project has the potential for green tourism and agreement over providing recreational facilities.
--

Alternative Options URV2 – Wallasea Island

Support for the policy – the RSPB will provide appropriate recreational opportunities on Wallasea Island.

Appendix 2d – Representations from Agents

Summary of Agents comments on the Introduction

Introduction	
Agent	Summary of representation(s)
Charles Planning Associates Ltd (representing Swan Hill Homes Ltd)	In general terms the Core Strategy is overly prescriptive and detailed, dealing with too many issues and providing too many policies that could be and should be dealt with in other Development Plan Documents
RW Land & Planning (representing J F Spencer & Son Ltd)	Welcome the importance the Council place on the close links between the Sustainable Community Strategy and the Core Strategy including ensuring accessibility to services.
Croudace Strategic Ltd	The time horizon of the Core Strategy should be at least 15 years from the date of adoption.
Edward Gittins & Associates (representing Crowstone Properties Ltd)	<p>Found the summary of public opinion in "Listening To Your Views" both interesting and valuable as a basis for formulating the Core Strategy.</p> <p>Suggests asking the question regarding the development of green belt phrased: "should we safeguard the Green Belt rather than make provision for the various types of housing to meet the needs of our existing and future residents?" rather than "should Green Belt land be developed?" to gauge a different response.</p> <p>Suggests that housing shortages drive property prices higher due to scarcity, making it difficult for young people to get on the housing ladder.</p> <p>Welcomes the fact that after many years of assiduous protection of Green Belt land, the Council has "grasped the nettle" and has clearly identified sound reasons why it is a Preferred Option to identify some Green Belt land for development.</p> <p>Suggests there are opportunities for providing Open Space for both formal and informal recreation in association with General Locations especially on the edge or within the Green Belt particularly opportunities on the western side of Ashingdon.</p> <p>Suggest amendments throughout the Core Strategy to ensure its soundness, such as</p>

	referring consistently to Rochford/Ashingdon and Hockley/Hawkwell rather than just Rochford and Hockley.
Edward Gittins & Associates (representing Mr Dudley Ball)	<p>Found the summary of public opinion in "Listening To Your Views" both interesting and valuable as a basis for formulating the Core Strategy.</p> <p>Suggests asking the question regarding the development of green belt phrased: "should we safeguard the Green Belt rather than make provision for the various types of housing to meet the needs of our existing and future residents?" rather than "should Green Belt land be developed?" to gauge a different response.</p> <p>Suggests that housing shortages drive property prices higher due to scarcity, making it difficult for young people to get on the housing ladder.</p> <p>Welcomes the fact that after many years of assiduous protection of Green Belt land, the Council has "grasped the nettle" and has clearly identified sound reasons why it is a Preferred Option to identify some Green Belt land for development.</p> <p>Identified much to support within the document, but there is insufficient justification and clear testing of options against agreed criteria. It is important that the process to determine the general locations for example is clear to ensure soundness of the document.</p> <p>Suggest amendments throughout the Core Strategy to ensure its soundness, such as referring consistently to Rochford/Ashingdon and Hockley/Hawkwell rather than just Rochford and Hockley.</p>

Characteristics Issues and Opportunities	
Agent	Summary of representation(s)

<p>RW Land & Planning (representing JF Spencer & Son Ltd)</p>	<p>Welcome the acceptance by the Council that infilling alone will not be able to provide the housing numbers necessary and that this would have an adverse effect on the character of the towns. It is surely more sustainable to concentrate additional housing on greenfield sites which benefit from existing infrastructure and nearby services.</p> <p>Due to the high car dependency away from the three main towns, it is more sustainable that the majority of the planned housing should be in or around these towns due to the rail links. We welcome the four tiers of settlements and the Council's acknowledgment that Hockley is classed as a Tier One settlement containing a "local town centre catering for local need".</p> <p>Also agree that the Second tier Settlements of Hullbridge and Great Wakering have a "more limited range of services access to public transport is relatively poor".</p>
<p>Edward Gittins & Associates (representing Crowstone Properties Ltd)</p>	<p>Found the "Characteristics, Issues and Opportunities" section to be a useful summary which painted an accurate picture of the current character and contemporary issues in Rochford District.</p>
<p>Edward Gittins & Associates (representing Mr Dudley Ball)</p>	<p>Found the "Characteristics, Issues and Opportunities" section to be a useful summary which painted an accurate picture of the current character and contemporary issues in Rochford District.</p>

Vision	
Agent	Summary of representation(s)
<p>Planning Potential (representing Fairview New Homes)</p>	<p>there are a number of aspects which are currently inconsistent or do not accurately reflect the sentiments of the Preferred Policies set out in the remainder of the draft Core Strategy. There is currently no recognition within the Council's key objectives of the most appropriate direction for development. it should be made clear as part of objective six that the Green Belt boundary is to be re-defined.</p>
<p>Edward Gittins & Associates (representing Crowstone Properties Ltd)</p>	<p>Support the overarching vision and the key planning objectives. Suggest that a fuller explanation of how the vision is to be realised and reference to the types of measures or policy and proposals that will be introduced to implement the key planning objectives should</p>

	be included.
Edward Gittins & Associates (representing Mr Dudley Ball)	Support the overarching vision and the key planning objectives. Suggest that a fuller explanation of how the vision is to be realised and reference to the types of measures or policy and proposals that will be introduced to implement the key planning objectives should be included.

Summary of Agents Comments on the Housing Chapter

Housing - Introduction	
Colliers CRE (representing Aber Ltd)	Support the principle of the Core Strategy identifying the general locations for housing development but acknowledge that the precise boundaries of the sites will be determined in the Allocations Development Plan Document

Croudace Strategic Ltd	<p>The baseline for the housing land supply information should be the most recent, in this case 31st March 2007, as opposed to 2006. It is not clear why 2006/7 supply has to be estimated rather than based on completion records.</p> <p>It is noted that the minimum balance for 2006-2021 is 2,489 whereas locations for just 2,500 have been identified. This does not allow for any non-delivery or slippage, and represents an over supply of just 11 units which is not in the spirit of minimum allocations as introduced in the East of England Plan.</p>
Andrew Martin Associates Ltd (representing A W Squier Ltd)	<p>The Council should work towards a plan life, which ends in 2026 rather than 2025, ensuring that the Core Strategy can demonstrate a fifteen year continuous supply of housing land. The housing land supply data is based on an assessment method, which is now out of date and contrary to Government advice.</p>
Charles Planning Associates (Swan Hill Homes Ltd)	<p>Swan Hill recognises the importance of seeking to concentrate new developments mainly in the existing urban areas, on previously developed land where possible.</p> <p>Swan Hill supports the approach that green field land on the edge of settlements that are released for development should not have a significant impact on the characteristics of the Green Belt, and that densities are in line with the objectives of PPS3 and reflect the local character of the settlement to which the extension is proposed.</p>
Planning Potential (representing Fairview New Homes Ltd)	<p>care should be taken to ensure that the requirements stipulated at Paragraph 54 of PPS3 are adhered to. In particular, the deliverability of sites should be carefully considered when taking decisions on the timing of housing development, in that the site should be available, suitable and achievable, in order that the five year housing supply is realistic in its aims.</p>

Housing Distribution	
Agent	Summary of representation(s)
Colliers CRE (representing Aber Ltd)	Support the findings that over the plan period, 70% of new housing will need to be on green field sites as sustainable extensions to existing settlements.
Christopher Wickham Associates (representing Inner London Group)	Suggest that the UCS 2007 underestimated the capacity for some of the sites, e.g. Stambridge Mills and Star Lane Brickworks are both capable of accommodating substantially more development.
Iceni Projects Ltd (representing Colonnade)	Concur that it is not realistic to expect Rochford's housing allocation to be met mainly

Land LLP)	on Brownfield sites, and support the aim of delivering 30% of development on previously developed sites.
Strutt and Parker (representing Chelmsford Diocesan Board of Finance)	Support the concern regarding the effect of "town cramming" on the attractiveness and character of parts of the District. Providing 60% of housing on previously developed land as advocated by Government Policy may be unrealistic in Rochford. A 30:70 split between development on previously developed land and suitable Greenfield locations at the edge of sustainable settlements is also supported.
Edward Gittins & Associates (representing Crowstone Properties Ltd)	<p>Considers that the remaining balance of 3,489 units for the period up to 2025 represents a substantial commitment and requires careful decisions in relation to its future distribution.</p> <p>Suggests that the Council can be justifiably proud of its record in directing a high proportion of recent growth to brownfield sites, however, the decline in this finite resource is inevitable. Agree that brownfield sites are dwindling and there is an increasing need to use greenfield sites. The 30% allocation to brownfield sites is probably realistic and hence deliverable.</p> <p>It is also important not to rely on regular reviews of the Green Belt boundary and this points to the need for long term land reserves needed for development being taken out of the Green Belt as part of the Core Strategy.</p> <p>Believe that the approach to the preferred distribution is the right one but have not seen the evidence to support this important claim.</p> <p>The distribution of housing should be considered holistically with other development needs of the district such as employment and community facilities rather than in isolation to ensure that they are closely and geographically associated and reflect a comprehensive and coherent strategy.</p>

Alternative Option H2 – General Locations and Phasing	
Agent	Summary of representation(s)
Colliers CRE (representing Aber Ltd)	The approach to sustainable development and focussing housing development in the higher tier settlements, with a proportion of the new housing in the lower tier settlements.

Croudace Strategic Ltd	Strategic sites should be clearly identified. The current programme will not allow for delivery before 2014.
Christopher Wickham Associates Ltd (representing Inner London Group)	<p>Agree with the concept of sustainable development. Factors such as the re-use of previously developed land, accessibility to services, infrastructure capacity, deliverability, the re-use of on-site materials, the removal of contamination, and the protection of the local environment are key considerations.</p> <p>Also suggests that development at Hullbridge and Canewdon would not accord with the objectives of sustainable development. New housing should be directed towards those areas with a close relationship with Southend.</p>
Strutt & Parker (representing Chelmsford Diocesan Board of Finance)	<p>Supports the balanced strategy adopted for the settlement hierarchy.</p> <p>Believes that Hawkwell is considered to be a sustainable settlement, capable of accommodating development to the south. A potential site for housing put forward during previous consultations, to the south of Ironwell Lane, Hawkwell, it is well located in terms of services, facilities and employment opportunities and has good links with Hockley.</p>
Andrew Martin Associates Ltd (representing A W Squier)	Supports the general locations identified in the Core Strategy, however they are too vague.
Kember Loudon Williams (representing Barratt Eastern Counties)	The table on page 26 which sets out the settlement tiers is supported. Rayleigh, Rochford/Ashingdon, Hockley/Hawkwell are clearly the largest settlements in the District and they benefit from good employment, housing, leisure, community and public transport provision.
Planning Potential (representing Fairview New Homes)	<p>At present, support cannot be provided to the Settlement hierarchy as set out on Page 26 of the draft Core Strategy Document. Whilst it is considered appropriate for Rayleigh to be designated as a Tier 1 settlement, the draft Core Strategy is currently not consistent throughout in this respect. Rayleigh should be considered the priority direction for housing development given the greater level of services available and public transport connections, in line with the designation set out on Page 20.</p> <p>Therefore, recommend on behalf of Fairview New Homes that the settlement hierarchy set out on</p>

	Page 26 be amended in order to reflect the higher level order of Rayleigh.
Graham Jolley Ltd (representing Mr J Hart)	<p>The Council's acceptance that some Green Belt land will need to be released and 70% of new housing is to be on greenfield sites, as sustainable extensions to existing settlements within the plan period 2001 - 2021 is supported.</p> <p>Their client is also in favour of focusing new housing development on the higher tier settlements (H2), which includes Rochford/Ashingdon, as part of the proposed balanced strategy.</p>
Iceni Projects Ltd (representing Colonnade Land LLP)	Colonnade concur with the general principle of the settlement hierarchy, albeit would reaffirm its view that Rochford has the potential to stand above all other settlements due to its proximity to London Southend Airport. The Airport, along with London Gateway, is one of the two most significant employment opportunities within the Essex Thames Gateway. The Core Strategy should more specifically acknowledge this opportunity, and reflect this in its approach to all policies and objectives.

Preferred Option H1 – Distribution	
Agent	Summary of representation(s)
Christopher Wickham Associates (representing Inner London Group)	<p>Suggest that the UCS 2007 underestimated the capacity for some of the sites, e.g. Stambridge Mills and Star Lane Brickworks are both capable of accommodating substantially more development.</p> <p>Recommend that H1 should state that the maximum use will be made of previously developed land.</p>
Stolkin & Clements LLP (representing Firstplan)	Stolkin and Clements (Southend) LLP support this policy.
Charles Planning Associates (representing Swan Hill Homes)	Swan Hill generally supports the approach taken by the Council in this preferred option.
David Grew Ltd (representing David Grew Ltd)	This option appears to contradict one of the key objectives of this Core Strategy, i.e. the efficient and effective use of land, as well as National and Regional policy guidance. The density of development in existing 1st tier settlements is relatively low and there is considerable scope for intensification without 'town cramming'. This option cannot be considered sustainable.

<p>Kember Loudon Williams (representing Barratt Eastern Homes)</p>	<p>It is likely that at least 400-600 dwellings of the 1301 assumed to come forward from urban capacity are unlikely. There is therefore a significant shortfall which needs to be made from further allocations on greenfield land and by compressing the phasing periods outlined under Policy H2 and H3 to speed up delivery.</p>
<p>Planning Potential (representing Fairview New Homes)</p>	<p>Their client would like to provide support to the realistic approach taken by the Council in respect of brownfield development within existing settlement boundaries. However, in order that the character of existing settlements can be maintained and Policy H1 can be adequately implemented, Policy GB1 relating to Green Belt protection will need to incorporate a sufficient level of flexibility to allow the release of Green Belt land where it is considered appropriate.</p>
<p>Graham Jolley Ltd (representing Mr & Mrs Harold)</p>	<p>It is noted some Green Belt land will need to be released and 70% of new housing is to be on greenfield sites, as sustainable extensions to existing settlements within the plan period 2001 - 2021.</p> <p>Their clients support the Council's preferred option for the distribution of land for new housing, so as to avoid the over intensification of existing residential areas, in accordance with H1.</p> <p>Their clients support the Council's Preferred Option for the General Location of future housing development, as set out in H1, on the understanding this does not exclude their own site (see call for sites ref number 114) and they feel the West Hockley area has the potential for a greater number of dwellings both during the pre 2015 period and between 2015 and 2021.</p>
<p>G Jolley Ltd (representing J Hart)</p>	<p>Their client does not support the Council's Preferred Options for the General Location and Phasing of future housing development, as set out in H1 & H2, which is to totally exclude North Ashingdon from any future housing development within the period up to 2025, now being considered.</p> <p>Some growth within the North Ashingdon area is felt to be appropriate given the pattern of the</p>

	existing settlement, the established infrastructure and accessibility enjoyed by this more established area.
Graham Jolley Ltd (representing Mr A C E Kingston)	<p>Their client supports the Council's preferred option for the distribution of land for new housing broadly in accordance with the key diagram, so as to avoid the over intensification of existing residential areas, in accordance with H1.</p> <p>The approach of focusing new housing development on the higher tier settlements, including Rayleigh, Rochford/Ashingdon, and Hockley/Hawkwell is supported, as part of the proposed balanced strategy.</p>
Graham Jolley Ltd	<p>Their client support the Council's preferred option for the distribution of land for new housing broadly in accordance with the key diagram, so as to avoid the over intensification of existing residential areas, in accordance with H1.</p> <p>The approach of focusing new housing development on the higher tier settlements, including Rayleigh, Rochford/Ashingdon, and Hockley/Hawkwell is supported, as part of the proposed balanced strategy</p>
RW Land and Planning (representing JF Spencer & Son Ltd)	Acknowledge that brownfield sites should take priority over the development of greenfield sites. However, with a rising housing market over recent years, many of the sites identified in the Urban Capacity Study still remain undeveloped it could be argued that if the sites were suitable for development they would have come forward by now. The Council must therefore demonstrate that there is evidence to suggest that the remaining sites are genuinely available and deliverable within the specified phased timescale.
Boyer Planning Ltd (representing Pond Chase Nurseries Ltd)	<p>Generally support the policy and the sequential approach it proposes.</p> <p>It will be important to ensure that within the Site Allocations Development Plan Document a mix of housing sites to provide a range of housing types that best meet the needs of the District are identified.</p>
Andrew Martin Associates (representing M D Smith & Son)	Object to policy.

Iceni Projects Ltd (representing Colonnade Land LLP)	The policy objective of resisting intensification of smaller sites in residential areas is supported. Whilst the general principle of directing housing development towards previously developed land is accepted, deliverability of identified sites must be carefully monitored. The policy should be sufficiently flexible to allow for additional sites to be brought forward in order to demonstrate the continuous delivery of a five year housing land supply.
Strutt & Parker (representing Mr G Marshall)	The realistic assessment of the limited nature of brownfield land within the district. coupled with the recognition of the harm to residential character that can be caused by excessive urban intensification is welcomed. and the percentage of dwellings likely to be derived from this source is in our view reasonable
Savills (representing Martin Dawn PLC)	In accordance with government objectives we agree with the prioritisation of previously developed sites to contribute to the borough's housing supply targets., greenfield sites which are sustainably located should be promoted for housing to ensure that the minimum housing targets are met and exceeded.
Sellwood Planning Ltd (representing Aston Unit Trust & J Needs)	The H1 distribution should set out the full sequential priority approach to the selection of development sites in Policy H2. This should start with previously developed land in sustainable locations followed by land in the 'tier 1 settlements' and then tier 2 and tier 3 settlements.

Preferred Option H2 – General Locations and Phasing	
Agent	Summary of representation(s)
Colliers CRE (representing Aber Ltd)	Agree with the general locations and phasing of residential properties. A flexible approach with regards the timing and release of land for residential development is needed. It is recommended that a greater proportion of the units are undertaken in the period up to 2015, and a proportion of units are transferred from the 2021 - 2025 period to the 2015 – 2021 in South East Ashingdon.
Whirledge and Nott (representing Messrs Smith and Francis)	Object to the exclusion of land at Sandhill Road, Eastwood and welcome the identification of Rayleigh as a Tier 1 settlement.
C & S Associates	Policies H2 and H3 should be amended to

(representing Firstplan)	include residential development allocated in the London Southend Airport and Environs Joint Area Action Plan.
Stolkin and Clements (Southend) LLP (representing Firstplan)	Further thought should be given to the distribution and extent of the housing allocations with a proportion of the housing allocations in Policies H2 and H3 being available for Tithe Park, perhaps described as: 'land to the south west of Great Wakering, adjoining the boundary with Southend'.
Andrew Martin Associates Ltd (representing A W Squier LTD)	Suggests that the areas identified in the policy do not correspond with the symbols in the Key Diagram. East Ashingdon and South East Ashingdon are particularly confusing as the symbols in the Key Diagram are better described as South Ashingdon and North East Rochford.
Christopher Wickham Associates (representing Inner London Group)	Suggests that the release of Green Belt land should be minimised and best use should be made of previously developed land. The remote settlements of Hullbridge and Canewdon are unsuitable for significant additional housing, either before or after 2015.
Strutt and Parker (representing Chelmsford Diocesan Board of Finance)	Support the broad locations for development detailed in H2 that are in accordance with the settlement hierarchy. Particularly support the indicative level of growth directed towards south Hawkwell.
Charles Planning Associates (representing Swan Hill Homes)	As set out above, Swan Hill supports the overall approach the Council has taken in this revised version of the Core Strategy.
Kember Loudon Williams Ltd (representing Barratt Eastern Counties)	It is very important that the framework properly distinguishes between what should be provided as part of new development schemes and what shouldn't. Support the strategy that new housing growth should be targeted at land South of Hawkwell. The main objection is to the phasing strategy.
Whirledge and Nott (representing J Robinson)	Welcome the allocation of residential development to the village of Canewdon prior to 2015. Object, however, to the identification of land South of Canewdon and feel strongly that it should be allocated to the North and North West of the village at Canewdon Hall Farm.
Planning Potential (representing Fairview New Homes)	Fairview New Homes would like to offer strong support in response to Preferred Policy H2 as well as to the general housing locations as shown on the accompanying Key Diagram. In particular, it is requested that the intention to extend the existing settlement boundary in the south west

	area of Rayleigh is retained
Graham Jolley Ltd (representing Mr and Mrs Harold)	Accordingly their clients ask for the tables in H2 and H3 to be amended so as to include a higher allocation for the West Hockley area.
Graham Jolley Ltd (representing Mr J Hart)	Their client, however, does not support the Council's Preferred Options for the General Location and Phasing of future housing development, as set out in H1 & H2, which is to totally exclude North Ashingdon from any future housing development within the period up to 2025, now being considered.
Graham Jolley Ltd (representing Mr A C E Kingston)	Their client is in broad support of the Council's Preferred Option for the General Location and Phasing of future housing development, as set out in H2, which is to include a significant element of new housing within the south west Rayleigh area. However, it is suggested that, in view of the above mentioned sustainable advantages of Rayleigh, together with the uncertainties of longer term housing demand, it is appropriate to consider a provision for some additional housing within the south west Rayleigh area for the post 2021 period.
RW Land and Planning (representing JF Spencer and Son Ltd)	<p>Accepts that greenfield development will be necessary in order to achieve the required housing numbers.</p> <p>The reliance of Tier Two and Three settlements (Hullbridge, Great Wakering and Canewdon) to provide 860 houses pre 2021 is unsustainable, unjustified and contrary to sustainable planning guidance at all levels.</p> <p>Tier 2 and 3 settlements have limited services and public transport and despite this 34% of Greenfield housing allocations are located here with no justification.</p> <p>Contrary to PPS3.</p> <p>Hockley allocation contrary to CSPO vision of concentrating development on Upper Tier settlements.</p> <p>Preferred Option and Key diagram should be amended to reduce housing numbers in Tier 2 and 3 settlements and redistribute the surplus to Tier 1 settlements – Hockley in particular. Land at Folly Chase is suitable and capable of accommodating circa 200 houses.</p>

JSP (representing N Jackson)	Suggested development locations and justifications: LAND AT MAGEES NURSERIES, WINDSOR GARDENS and LAND EAST OF CLEMENTS HALL SPORTS CENTRE, HAWKWELL
Design Associates (representing A F Merry)	<p>Their client is heartened to note that some green belt land is deemed to be required to be released for new housing, and that the council are in support of new residential development occurring mainly to the edge of existing main settlements. It is considered that Rayleigh is the only urban area with a principle town centre and it has the best to services in the district.</p> <p>Believe the locations shown on the key diagram for the allocation of new housing development does not give adequate recognition of the valuable contribution potential sites situated at the eastern edge of the settlement area of Rayleigh will give.</p> <p>It is considered that some modest growth to the east of Rayleigh could be accommodated without detriment to the upper Roach Valley or the separation between Rayleigh and Hockley.</p>
Graham Jolley (representing Stuart Ross)	<p>Their client supports the Council's preferred option for the distribution of land for new housing broadly in accordance with the key diagram, so as to avoid the over intensification of existing residential areas, in accordance with H1.</p> <p>The approach of focusing new housing development on the higher tier settlements, including Rayleigh, Rochford/Ashingdon, and Hockley/Hawkwell is supported, as part of the proposed balanced strategy.</p> <p>Their client supports the Council's Preferred Option for the General Location and Phasing of future housing development, as set out in H2, which is to include a significant element of new housing within the south Hawkwell area.</p> <p>Similarly, the preferred option H3, relating to the General Location for housing post 2021, which incorporates a further significant element of housing within the south Hawkwell area, is supported by their client.</p> <p>H2 contradicts GB1 and should be reworded.</p>

Croudace Strategic Ltd	<p>Unrealistic build rates. More detail in Core Strategy would speed up delivery. Many locations fail to PPS3's deliverability criteria and conflict with other CS policies. North of London Road, Rayleigh - Deliverable: Yes based on information available, but to different timescales West Rochford - Deliverable: No West Hockley - Deliverable: No South Hawkwell - Deliverable: No East Ashington - Deliverable: Unknown SE Ashington - Deliverable: Yes based on information available. SW Hullbridge - Deliverable: No SW Great Wakering - Deliverable: Yes, but at a reduced scale. West Great Wakering - Deliverable: No</p> <p>Of the 11 locations identified, there are fundamental delivery problems with six, which casts doubt over the whole Core Strategy.</p>
Graham Jolley Ltd	<p>Their client supports the Council's Preferred Option for the General Location and Phasing of future housing development, as set out in H2, which is to include a significant element of new housing within the south Hawkwell area.</p>
David Grew	<p>Assuming the proposed new development has a density of 50 dph, which is highly unlikely, RDC are proposing to release a minimum of 29 hectares of Green Belt by 2015, for housing alone. This is an unsustainable approach and does not represent efficient and effective use of land.</p>
Swan Housing Association	<p>Feel that the land to the south west of Hullbridge represents an excellent opportunity to deliver a sustainable community which is in line with the Council's vision of future development in the district.</p>
Boyer Planning Ltd (representing R Ricks)	<p>Would support this Policy. It is clear that settlement boundaries will need to be amended to meet the District's housing requirement.</p>
Mr Ashley Robinson (representing Mr & Mrs Houghton)	<p>High density residential development is totally inappropriate on important green belt areas surrounding existing development. If any residential development is deemed appropriate it should be of a low density buffer of one or two dwellings to maintain the rural character and well being of the area, which is low density at the</p>

	Great Wheatley area.
Andrew Martin Associates (representing M D Smith & Son Ltd)	Rawreth should be identified as forming part of the proposed growth area to the west of Rayleigh. Where opportunities exist for developing previously developed land exist these should take precedence over greenfield housing allocations, subject to sites being available and deliverable.
Iceni Projects Ltd (representing Colonnade Land LLP)	<p>Iceni would suggest that housing numbers and delivery times deserve clarification. In view of the guidance provided by PPS3 it is important that the Core Strategy is not perceived as placing a continuing reliance on windfall sites. Should this be the case, the Core Strategy should look to identify additional land to meet its housing target under Policy H2.</p> <p>However, without providing any notional site areas, development density, or land take of associated facilities (such as those listed within H Appendix 1) it is difficult to quantify how likely it is that these sites will be capable of meeting the District's housing target. Iceni would suggest that this information needs to be incorporated within further iterations of the Core Strategy.</p> <p>Colonnade is content to focus on the merits of promoting Coombes Farm (or East Rochford) as a suitable location for residential development rather than criticising those areas identified. it is evident that there are compelling grounds for identifying Coombes Farm (within an East Rochford area designation) under Policy H2, and that in particular, it should be recorded as a priority location for helping to meet the District's five year housing land supply. town centre entirely.</p>
Countryside Properties (Southern) Ltd	Support the allocation of 650 units of land North of London Road, Rayleigh
Countryside Properties (Southern) Ltd	<p>The key diagram is too vague and there should be a clearer identification of growth areas. It is not possible to ascertain the extent/location of likely development areas (not just North of London Road) and therefore their relationship to existing residents/road network etc.</p> <p>No appropriate density ranges are given within the Core Strategy, so again it is difficult to ascertain the likely land area required to achieve the number of units required/specified.</p>

	<p>Believe that appropriate density ranges should be specified (a separate policy).</p> <p>As stated above, it is not clear where, on land west of Rayleigh, these units are to be provided, but if the existing electricity power lines/pylons are seen as a western barrier to development, it must be emphasised that these can be relocated. There appears to be no reasoning/justification as to why the figure of 650 units has been chosen.</p> <p>Agree that development should be comprehensively planned, and support the principle of providing a range of other uses and infrastructure to serve any urban extension west of Rayleigh. However, such infrastructure must be reasonably associated with the impacts of the development.</p> <p>Suggest however that due to the limited constraints to delivery of development on land north of London Road (West Rayleigh) that all 650 units could be delivered by 2015, assuming a planning permission can be obtained soon after the adoption of the Core Strategy.</p>
<p>Strutt & Parker (representing Mr G Marshall)</p>	<p>Support the aim of securing a balanced strategy, and as set out above, the general distribution across the district. Great Wakering as a second tier settlement albeit that this is a smaller settlement with a large rural hinterland. It is significantly smaller than the settlements identified in the top tier and therefore the identification of some 350 houses up to 2021 with a further 160 post 2021 it is questioned. A modest allocation such as that identified for Canewdon to anchor local services would be more appropriate.</p> <p>A similar consideration relates to Hullbridge which is identified as accommodating some 450 houses up to 2021 with a further 90 post 2021. Hullbridge is a large village although has some facilities in terms of shops and a bus service together with a school.</p>
<p>Strutt and Parker (representing Mr G Marshall)</p>	<p>As a consequence of the above, the Peggle Meadow site is the most sustainable site in the District for the following reasons: -</p> <ul style="list-style-type: none"> • The close proximity of the site to the proposed new railway station at Southend Airport which is due for completion in 2009.

	<ul style="list-style-type: none"> • The close proximity of the site to the A127_ • The ability of the site to contribute to a sustainable cycle network and footway link (Green Grid Greenway No. 18). • Not only is the site free from flood risk, but it could also theoretically contribute to the reduction of existing fluvial flood risk currently affecting residential areas further downstream by sustainable urban development and enhanced flood water storage by means of dry ponds within a large green open space located to the south of the site next to the Borough boundary. • The close proximity of the site to local shops. Three major areas of employment. Southend Hospital and Rochford Town Centre • The site lies on the main bus routes that run through the District and is served by bus stops Immediately outside the site on Southend Road. • The Highway Authority has agreed in principle that the site could be served by a traffic-controlled access off Southend Road.
Edward Gittins & Associates (representing Crowstone Properties Ltd)	<p>It is unclear what process of selection was undertaken to arrive at this particular choice of area.</p> <p>Supports phasing if this assists in ensuring land allocations are more evenly spread and hence available throughout the plan period, but the reasoning behind the split before and after 2015 is unclear.</p> <p>There is no reference to the possible option of development on the western side of Ashingdon (an area has been submitted on behalf of Crowstone Development Ltd).</p>
Edward Gittins & Associates (representing Mr Dudley Ball)	<p>Considers that the remaining balance of 3,489 units for the period up to 2025 represents a substantial commitment and requires careful decisions in relation to its future distribution.</p> <p>Suggests that the Council can be justifiably proud of its record in directing a high proportion of recent growth to brownfield sites, however, the decline in this finite resource is inevitable. Agree that brownfield sites are dwindling and there is an increasing need to use greenfield sites. The 30% allocation to brownfield sites is probably realistic and hence deliverable.</p>

	<p>It is also important not to rely on regular reviews of the Green Belt boundary and this points to the need for long term land reserves needed for development being taken out of the Green Belt as part of the Core Strategy.</p> <p>Believe that the approach to the preferred distribution is the right one but have not seen the evidence to support this important claim.</p> <p>The distribution of housing should be considered holistically with other development needs of the district such as employment and community facilities rather than in isolation to ensure that they are closely and geographically associated and reflect a comprehensive and coherent strategy.</p> <p>In turning to H2 General Locations and Phasing - Preferred Option, it is unclear what process of selection was undertaken to alight on this particular choice of area.</p> <p>Supports phasing if this assists in ensuring land allocations are more evenly spread and hence available throughout the plan period, but the reasoning behind the split before and after 2015 is unclear.</p> <p>Notes the inclusion in H2 of a location at West Hockley with a projected capacity of 50 units in the period to 2015. Suggests that this may relate to potential capacity that might become available on land known as Pond Chase Nurseries. Concern expressed regarding review of the Green Belt boundary in the general vicinity of Pond Chase Nurseries and Church Road, Hockley. The existing Green Belt boundary in this part of the settlement is highly arbitrary and has been blurred by development that has taken place on the edge of the town over a number of years.</p>
<p>Bidwells (representing H R Philpot & Sons (Barleylands) Ltd)</p>	<p>Supports H2. Suggests that deliverability is a key consideration at the preliminary stage. The Council should ensure there will be adequate land supply to provide housing, affordable housing, employment, protection on green infrastructure and leisure, tourism and community facilities, especially for Hullbridge.</p>
<p>Sellwood Planning Ltd</p>	<p><u>Proposed Changes to Policy H2</u></p>

(representing Aston Unit Trust & J Needs)	<ul style="list-style-type: none"> - Reduce the Hullbridge and Great Wakering housing allocations to around 100 dwellings each and delete the Canewdon greenfield allocation - Distribute the 'excess' Hullbridge, Great Wakering and Canewdon housing provisions to the three towns giving first priority to Rayleigh as the largest and most sustainable town - Add to the Rayleigh allocations 200 dwellings at Wellington Road phased in the pre 2015 period - Spread the north of London Road allocation over a longer time period.
Ashley Robinson (representing Mr D Houghton)	High density development is inappropriate on Greenbelt areas surrounding existing development. Any more development in Rayleigh is totally unacceptable.

Alternative Option H2 – General Locations and Phasing	
Agent	Summary of representation(s)
Croudace Strategic Ltd	Land at Mount Bovers Lane should be considered favourably.
RW Land & Planning (representing J F Spencer & Son Ltd)	Welcome the comments regarding North East Hockley and agree that the location would place undue pressure on the highway network and that it is unviable for development.
Countryside Properties Ltd	<p>There is no clear indication as to why 650 units have been identified for west Rayleigh and not more i.e. how this figure was reached. Rayleigh has the best access to services and is more ideally located in terms of retail and services.</p> <p>There should be flexibility in terms of timing of development. Delivery of strategic growth sites may need to be brought forward if housing delivery is falling short of forecasts, and the minimum of 5 year housing supply is under threat. Regular review of housing delivery is required.</p>
Countryside Properties LTd	<p>Alternative Options.</p> <p>Support Third to Sixth alternative options. West of Rayleigh is the most sustainable and accessible location for further development in Rayleigh, as other possible sites have serious policy, environmental or access/capacity</p>

	constraints to delivery. Therefore support the Council's approach to not identifying sites north, east or south/south east of Rayleigh for development, and limiting any development to the south west.
Strutt & Parker (representing Mr G Marshall)	Suggest Peggle Meadow is considered as a preferred option for development as it more sustainable as a result of its close proximity to Southend Airport, the risk of flooding is low.

Preferred Option H3 – General Locations Post-2021	
Agent	Summary of representation(s)
Christopher Wickham Associates (representing Inner London Group)	Considers there should be minimal new development allocated in Hullbridge and Canewdon given their remoteness and the likelihood of harm to the rural character of the places.
Strutt & Parker (representing Chelmsford Diocesan Board of Finance)	Supports the broad locations for development detailed in H2, particularly the indicative level of growth directed towards south Hawkwell.
Colliers CRE (representing Aber Ltd)	<p>Need to maintain flexibility in order to ensure certainty to the delivery of the 15 year supply, particularly if any of the locations identified in the period 2021 - 2025 need to be brought forward in order to maintain the 5 year supply.</p> <p>Appropriate phasing will avoid piecemeal development, and on a practical point avoids a state of uncertainty between the two phases where there would be unfinished work</p> <p>It is recommended that a proportion of units are transferred from the 2021 - 2025 period to the 2015 - 2021 period. This approach would assist in paying for front end costs</p>
Firstplan (representing Stolkin and Clements)	Further thought should be given to the distribution and extent of the housing allocations with a proportion of the housing allocations in Policies H2 and H3 being available for Tithe Park, perhaps described as: 'land to the south west of Great Wakering, adjoining the boundary with Southend'
Croudace Strategic Ltd	The comment that the release of land needs to be flexible is welcomed. The policy should allow for sites to be brought forward prior to 2021 should non-delivery of the Policy H2 sites become apparent.
Andrew Martin Associates (representing A W Squier)	There is no need for this policy or its table. There is no evidence or reasoning to support

Ltd)	the number or locations selected for this later phase of development.
David Grew (representing David Grew)	This continuing release of Green Belt land is unsustainable. Intensification of Town Centre and urban areas should be maximised prior to release of Green Belt.
Design Associates (representing AF Merry)	Taking into account the above we ask the council to give further consideration to the H2 options so as to provide for a greater number of dwellings around Rayleigh with some additional housing to the east of Rayleigh not only for the 2001-2021 period but also the post 2021 period.
Charles Planning Associates (representing Swan Hill Homes Ltd)	<p>Swan Hill supports the general principles of this policy, and that the Council has sought to make provision for a 15-year supply of housing land supply, from the date of adoption of the document, as set out in PPS3.</p> <p>Swan Hill considers it is important that the Policy provision sets out that this is a minimum level post 2021, and is likely to change over the course of the Core Strategy period.</p>
Whirledge and Nott (representing Mr J Robinson)	Welcome the allocation of residential development to the village of Canewdon prior to 2015. I do however object to the identification of land South of Canewdon and feel strongly that it should be allocated to the North and North West of the village at Canewdon Hall Farm.

<p>Kember Loudon Williams Ltd (representing Barratt Eastern Counties)</p>	<p>As is made clear (Paragraph B9 of Circular 5/05) contributions should not be used to make good existing deficiencies in infrastructure provision. Nor are they to be used to secure contributions to the achievement of wider planning objectives that are not necessary for consent to be granted. In that context the Core Strategy should set this out as its policy framework.</p> <p>Main objection is to the phasing strategy and in turn the very low annual output figures identified for the South of Hawkwell, although our comments will be relevant to the other housing locations and their associated phasing regime identified by the Council.</p> <p>Given the anticipated phasing and consequential low delivery rates in the draft Core Strategy, there is a concern that in this area of high demand for new housing, demand will continue to outstrip supply.</p> <p>Concerns over the urban capacity study indicate that housing land supply is in shortfall - quicker housing deliver is therefore necessary. If the Inspector accepts our concerns over the urban capacity study then the phasing strategy and land supply shortfall will need to be addressed.</p>
<p>Graham Jolley Ltd (representing Mr A C E Kingston)</p>	<p>Their client is in broad support of the Council's Preferred Option for the General Location and Phasing of future housing development, as set out in H2, which is to include a significant element of new housing within the south west Rayleigh area. However, it is suggested that, in view of the above mentioned sustainable advantages of Rayleigh, together with the uncertainties of longer term housing demand, it is appropriate to consider a provision for some additional housing within the south west Rayleigh area for the post 2021 period.</p>
<p>Graham Jolley Ltd (representing Graham Jolley)</p>	<p>Similarly, the preferred option H3, relating to the General Location for housing post 2021, is supported by their client.</p>
<p>RW Land & Planning (representing J F Spencer & Son Ltd)</p>	<p>The continued reliance on lower tier settlements post 2021 is again unjustified and unsustainable with 340 homes proposed. These locations, even following improvements to the infrastructure will not provide genuine alternatives to the private car due to the length</p>

	of journeys required to get to services, facilities and employment.
Andrew Martin Associates Ltd (representing M D Smith & Son Ltd)	Rawreth should be identified as forming part of the proposed growth area to the west of Rayleigh. Where opportunities exist for developing previously developed land these should take precedence over greenfield housing allocations, subject to sites being available and deliverable.
Iceni Projects Ltd (representing Colonnade Land LLP)	Colonnade welcomes the fact that the Core Strategy correctly responds to the requirements of PPS3 in identifying broad locations for the delivery of a fifteen year housing land supply. it remains to be seen whether the areas identified are sufficiently robust to meet the District's longer term housing requirements, because at this stage, there is insufficient information to comment.
Countryside Properties (Southern) Ltd	It is noted that there are no numbers allocated for Rayleigh post 2021. Bearing in mind the sustainability and accessibility credentials for Rayleigh as opposed to other settlements within the district, we would argue that longer term growth should be planned for, on top of the earlier allocations.
Edward Gittins & Associates (representing Crowstone Properties Ltd)	Need to justify the general locations and the capacity for the areas identified and ensure that site locations are sustainable and justifiable as Preferred Options. Information and analysis to support the general locations both pre and post 2015 and post 2021 is lacking and suggest that these should be included to ensure the soundness of the Plan.
Edward Gittins & Associates (representing Mr Dudley Ball)	Need to justify the general locations and the capacity for the areas identified and ensure that site locations are sustainable and justifiable as Preferred Options. Information and analysis to support the general locations both pre and post 2015 and post 2021 is lacking and suggest that these should be included to ensure the soundness of the Plan.
Bidwells (representing H R Philpot & Sons (Barleylands) Ltd)	Supports the general principles of this policy. Believes that further housing growth in Hullbridge would continue to support the strategy of creating centre focus as identified in H2, such as a range of housing mix, affordable housing, employment enhancement, protection of the existing wider environment, leisure,

	tourism and community facilities and new football pitches. In addition they consider that additional housing growth will ensure the provision of a new primary school, formal play provision, strategic open space/planting, country park and riverside walk linking into the proposed development by encompassing the existing routes and water frontage.
Sellwood Planning Ltd (representing Aston Unit Trust and J Needs)	document allocates too limited a housing provision to the three towns and an unsustainable level of new housing to the second and third tier settlements.

Alternative Option H3 – General Locations Post-2021

Agent	Summary of representation(s)
Croudace Strategic Ltd	This policy must provide sufficient flexibility to allow for sites to come forward pre-2021 to make up any shortfall from the Policy H2 sites.
Andrew Martin Associates Ltd (representing A W Squier Ltd)	The Council's reasons for departing from the Alternative Option are not adequately justified.

Preferred Option H4 – Affordable Housing

Agent	Summary of representation(s)
Colliers CRE (representing Aber Ltd)	It is recommended that in larger developments the affordable housing (both social rented and intermitted tenure) are clustered in groups of 6 to 10 units throughout the development in order to aid with on going management and maintenance undertaken by RSL or other body.
Firstplan (representing Stolkin & Clements)	Support this policy which seeks at least 35% of affordable housing on all developments of 10 or more units or on sites greater than 0.5ha unless there are site constraints which make the provision impossible.
Christopher Wickham Associates (representing Inner London Group)	It is considered that the 'pepper potting' of affordable housing throughout larger developments is not always appropriate in management and maintenance terms
Charles Planning Associates (representing Swan Hill Homes)	In general terms, Swan Hill supports the approach. A greater degree of flexibility should be set out in the policy. Registered Social Landlords (RSLs) may consider the 'pepper potting' of affordable dwellings throughout larger sites can have significant logistical and cost implications. Clustering should be considered.

<p>Kember Loudon Williams Ltd (representing Barratt Eastern Counties)</p>	<p>As currently drafted we feel that the policy is not concise enough and that the policy does not reflect current guidance. The policy should be redrafted so that "a target of 35% affordable housing shall be provided on all developments of 10 or more units..."</p> <p>The last policy paragraph provides some scope to relax this policy, if there are clear site constraints that make on site provision impossible. The policy, though, is not particularly clear on what would constitute exceptional circumstances.</p>
<p>Planning Potential (representing Fairview New Homes)</p>	<p>The flexibility and recognition that it may not be possible to provide the full requirement of affordable housing on all sites is offered strong support by our client.</p> <p>It is requested that the Council seek to retain an element of negotiation within Policy H4 when developing the Core Strategy to submission stage in order to allow a sensitive approach to local housing need as it fluctuates throughout the Council's administrative area rather than a blanket approach.</p> <p>Management is a real issue for social landlords, and often it is not practical to adopt a 'pepper pot' approach, and further consideration should be had of the 'user' / 'management' requirements when developing the Core Strategy to Submission Stage.</p>
<p>RW Land & Planning (representing J F Spencer & Son Ltd)</p>	<p>We do not accept the desire by the Core Strategy to "pepper pot" social housing throughout developments; it causes difficulty for Housing Associations to manage their properties effectively and efficiently. This should be amended to allow for clusters of social housing units in say, groups of 15-20.</p>
<p>Iceni Projects Ltd (representing Colonnade Land LLP)</p>	<p>Colonnade supports the proposed affordable housing target of 35%, It is likely that only Greenfield housing sites will be capable of meeting this target, Colonnade would also recommend that the Core Strategy specifically enables 100% affordable housing schemes to be brought forward on unallocated sites, potentially as</p>

	rural exception proposals.
Countryside Properties (Southern) Ltd	Support the principle of this policy, but must stress the need for flexibility in affordable housing provision, should it affect economic viability when competing against other community/ social/ transport infrastructure requirements sought as part of development of a site.
Edward Gittins & Associates (representing Crowstone Properties Ltd)	<p>Greater emphasis must be given in future to the delivery of affordable units, especially having regard to the high house values which preclude so many entering the housing market.</p> <p>Recognise that Exceptions Policies are necessary but deliver very little in terms of numbers and that it is the larger sites that have the viability which enables a significant proportion of affordable units to be provided or cross-subsidised by free market housing.</p> <p>Support the wording of H4 Affordable Housing - Preferred Option and favour this to the Alternative Options in H4.</p> <p>Express concern regarding the 'pepper potting' of affordable housing throughout larger developments. Agree that large blocks of affordable housing should be avoided if possible but 'pepper potting' can give rise to design and management problems. Prefer a more general reference to the need to avoid large blocks of affordable housing and the need to integrate affordable and free market housing in a harmonious way.</p>
Edward Gittins & Associates (representing Mr Dudley Ball)	<p>Greater emphasis must be given in future to the delivery of affordable units, especially having regard to the high house values which preclude so many entering the housing market.</p> <p>Recognise that Exceptions Policies are necessary but deliver very little in terms of numbers and that it is the larger sites that have the viability which enables a significant proportion of affordable units to be provided or cross-subsidised by free market housing.</p> <p>Support the wording of H4 Affordable</p>

	<p>Housing - Preferred Option and favour this to the Alternative Options in H4.</p> <p>Express concern regarding the 'pepper potting' of affordable housing throughout larger developments. Agree that large blocks of affordable housing should be avoided if possible but 'pepper potting' can give rise to design and management problems. Prefer a more general reference to the need to avoid large blocks of affordable housing and the need to integrate affordable and free market housing in a harmonious way.</p>
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Preferred Option H5 – Dwelling Types	
Agent	Summary of representation(s)
Colliers CRE (representing Aber Ltd)	The idea of providing a mix of dwelling types in both size and tenure is supported, however, it is considered that to make a specific requirement that a proportion of the affordable housing to be three bedroom dwellings is too prescriptive
Charles Planning Associates (representing Swan Hill Homes Ltd)	<p>With the exception of providing a suitable proportion of the provision of affordable units with three-bedrooms, the policy appears to represent the best option for ensuring flexibility for new housing developments.</p> <p>In respect of the reference to the Strategic Housing Market Assessment for Thames Gateway South Essex, it is important that if the Council chooses to rely on such assessments as a key factor in determining the appropriate level of mix, it is important that such an assessment is up-to date, and represent the most appropriate model for assessment the level of housing requirements.</p>
Kember Loudon Williams Ltd (representing Barratt Eastern Counties)	<p>The main thrust of the policy is supported That said, it is important that the policy does not rely completely on the SHMA since it does not fully reflect the housing market and in particular what local people demand of their new housing stock.</p> <p>The SHMA will be largely based on housing need and in that context does not take into account people's housing market aspirations. Consequently, a policy framework which focuses just on local need would set aside this important facet of the housing market.</p>
RW Land & Planning	It is imperative that H5 makes reference to the

(representing JF Spencer & Son Ltd)	influence of market demands and does not solely rely on the advice of the Strategic Housing Team as the policy currently intimates.
Iceni Projects Ltd (representing Colonnade Land LLP)	Colonnade welcomes the emphasis placed in the Core Strategy on delivering a mix of dwelling types, whilst making specific reference to the provision of family and affordable housing.
Edward Gittins & Associates (representing Crowstone Properties Ltd)	Support the wish to ensure a mix of dwelling types but much will depend of the size of the particular development, the character of the area, and any other local constraints or factors. Concern expressed regarding a blanket policy requiring a housing mix. The mix may be triggered by the requirement to provide affordable housing over and above the thresholds in H4. Suggests that the words "Where appropriate," should be inserted at the beginning of H5.
Edward Gittins & Associates (representing Mr Dudley Ball)	Support the wish to ensure a mix of dwelling types but much will depend of the size of the particular development, the character of the area, and any other local constraints or factors. Concern expressed regarding a blanket policy requiring a housing mix. The mix may be triggered by the requirement to provide affordable housing over and above the thresholds in H4. Suggests that the words "Where appropriate," should be inserted at the beginning of H5.

Alternative Option H5 – Dwelling Types

Agent	Summary of representation(s)
Firstplan (representing Stolkin & Clements LLP)	Stolkin and Clements (Southend) LLP support this policy which confirms that new developments will be required to contain a mix of dwelling types including a proportion of the affordable housing provided to be three-bedroom dwellings.

Preferred Option H6 – Lifetime Homes

Agent	Summary of representation(s)
Firstplan (representing Stolkin & clements)	Support policy
Charles Planning Associates (representing Swan Hill Homes)	objects to the Council's preferred options where all new dwellings should be provided to the Lifetime Homes Standard. Alternative option is more suitable. Should be determined on a case by case basis.
Planning Potential (representing Fairview)	Support recognition that in some instances the Lifetime Homes Standard will be unable to be met.

New Homes)	Flexibility needs to be retained.
RW Land & Planning (representing J F Spencer & Son Ltd)	Welcome viability testing
Boyer Planning Ltd (representing Pond Chase Nurseries Ltd)	Lifetime Homes Standard is unnecessary as it ignores the general movement of people between housing locations.

H Appendix 1	
Agent	Summary of representation(s)
Kember Loudon Williams Ltd (representing Barratt Eastern Counties)	<p>It is recognised that necessary infrastructure provision is an important part of creating a sustainable development and in that context appendix H1 and Policy H3 is supported.</p> <p>It is therefore essential that the framework acknowledges the importance of Circular 05/05 and the tests</p>
RW Land & Planning (representing JF Spencer & son Ltd)	Welcome the associated infrastructure required in relation to development at West Hockley.
Iceni Projects Ltd (representing Colonnade Land LLP)	<p>There is concern that the table in H Appendix 1 fails to provide the necessary justification for the proposed improvements in infrastructure</p> <p>For the avoidance of doubt, Colonnade would welcome similar information being provided as a caveat for the allocation of Coombes Farm. Colonnade is fully committed to delivering infrastructure and community improvements, and for Coombes Farm to properly address the needs of future and existing residents.</p>
Countryside Properties (Southern)Ltd	<p>Their approach has always been to provide the necessary infrastructure to serve any such development.</p> <p>With the above in mind, we are happy to state our support, in principle, for those infrastructure requirements for a new urban extension on land north of London Road, as set out in H Appendix 1 of the recently published Core Strategy Preferred Options (October 2008).</p> <p>We therefore accept that any development on land west of Rayleigh within our control may well have to accommodate land for a primary school (1.1 ha), provide a link to Green Grid Greenway no.13, provide for</p>

	<p>public transport enhancements, Sustainable Drainage Systems, public park land, play space, community and youth facilities where a need is demonstrated, and the scale of such provision relates reasonably to the scale of development permitted on that land within our control. Appendix 1 also identifies a requirement for a Primary Care Centre. Land could be safeguarded for such purposes, but again the extent of such a commitment, or any financial commitment towards such a facility would have to be justified</p>
<p>Bidwells (representing H R Philpot & Sons (Barleylands) Ltd)</p>	<p>Considers that growth potential in this location will need to encompass land to the north west of Hullbridge partly confined by a proposed coastal protection belt.</p> <p>Suggests that the provision of a new primary school, formal areas of play, country park and riverside walk should be considered to enhance the infrastructure already set out within H Appendix 1.</p>
<p>Sellwood Planning Ltd (representing Aston Unit Trust and J Needs)</p>	<p>The representations in respect of Policy H2 set out the case in favour of allocating a further housing site at Wellington Road, Rayleigh. In view of this, reference needs to be made in Appendix 1 to the range of social and physical infrastructure improvements which will be necessitated by the development of the site.</p>

Summary of Agents Comments on the Green Belt Chapter

Protection of Green Belt	
Agent	Summary of representation(s)
Colliers CRE (representing Aber Ltd)	A proportion of the Green Belt will have to be reallocated to accommodate additional housing.
Firstplan (representing C & S Associates)	Support changes to green belt to accommodate new housing and employment
Firstplan (representing Stolkin & Clements)	Green Belt boundaries will need to be amended to enable the required development to take place. If the Tithe Park site is taken out of the Green Belt, careful modelling of the proposal can provide well managed and defensible boundaries which will afford protection in the future to the areas to the north and west, thereby preventing any potential coalescence.
Croudace Strategic Ltd	The statement that "some Green Belt land is more worthy of protection than others" is welcomed. Unfortunately it has not been applied to Policy H2 which identifies land at South Hawkwell (presumably Land off Thorpe Road) as being suitable for development although the Local Plan Inspector said the Green Belt had an important function in this location.
Planning Potential (representing Fairview New Homes)	Support reallocation of some Green Belt Land, and suggest south west Rayleigh as an ideal location for this.

Preferred Option GB1 – Green Belt Protection	
Agent	Summary of representation(s)
Colliers CRE (representing Aber Ltd)	The need to maintain buffers to prevent the coalescence of individual settlements is supported.
Croudace Strategic Ltd	The reference to preventing coalescence accords with Government policy, but conflicts with Policy H2
Christopher Wickham Associates (representing Inner London Group)	The objective of GB1 to direct development away from the Green Belt is strongly supported although this is at odds with an expectation that 70% of new housing will need to be provided on Greenfield sites.
Charles Planning Associates (representing Swan Hill Homes Ltd)	It is important that Policy GB1 has regard to the need for a Green Belt boundary review. This should be noted in GB1 as being a means to ensure that minor Greenfield sustainable extensions can occur without offending the overarching Metropolitan Green Belt objectives.

Kember Loudon Williams Ltd (representing Barratt Eastern Counties)	This policy supported subject to it being made clear that housing land supply is a key component of the Core Strategy and as such there may be a need to review the Green Belt when delivery of housing stalls.
Planning Potential (representing Fairview New Homes)	In line with our comments above, our client would like to endorse Policy GB1 in that some allowance remains within the policy to permit the release of Green Belt land where appropriate and necessary.
Graham Jolley Ltd (representing Mr A C E Kingston)	GB1 needs to be amended, since the stated intention of this option, to seek to direct development away from the Green Belt, is considered to be in conflict with the controlled balanced release of some Green Belt land, which is clearly unavoidable as an integral part of the Councils stated future Core Strategy.
Graham Jolley Ltd (representing Graham Jolley Ltd)	It is felt the wording of GB1 is misleading, unrealistic and inconsistent with the preferred options H2 and H3. Accordingly our client considers the wording of GB1 should be amended to reflect the acceptance of some Green Belt release.
Andrew Martin Associates (representing M D Smith & Son)	We will seek to direct development away from the Green Belt, minimise the reallocation of Green Belt land and will prioritise the protection of Green Belt land based on how well the land helps achieve the purposes of the Green Belt. We will consider the scope for redevelopment of previously developed land within the Green Belt ahead of releasing greenfield sites within the Green Belt achieve the purposes of the Green Belt.
Mr David Grew (representing Mr David Grew)	H2 is in conflict with this policy.
Edward Gittins & Associates (representing Crowstone Properties Ltd)	<p>Support the conclusion that the time has now come when the current boundaries of the Green Belt need to be reviewed to ensure development required by the East of England Plan can be met in an environmentally acceptable way.</p> <p>Suggests that the revising of green belt boundaries should be long term and avoid repetitive short term reviews. The general locations in H2 and H3 should have regard to how well the land helps achieve the</p>

	<p>purposes of the Green Belt as outlined in GB1.</p> <p>Noted that strategic buffers are not mentioned or featured on the Key Diagram and should be deleted as green belt serves this purpose.</p> <p>Need clear evidence to support the general locations for growth in terms of their relative impact on the purposes of the Green Belt. Suggests there is a lack of joined up thinking between the Preferred Options in H1 and H2 and that in GB1.</p>
<p>Edward Gittins & Associates (representing Mr Dudley Ball)</p>	<p>Support the conclusion that the time has now come when the current boundaries of the Green Belt need to be reviewed to ensure development required by the East of England Plan can be met in an environmentally acceptable way.</p> <p>Suggests that the revising of green belt boundaries should be long term and avoid repetitive short term reviews. The general locations in H2 and H3 should have regard to how well the land helps achieve the purposes of the Green Belt as outlined in GB1.</p> <p>Noted that strategic buffers are not mentioned or featured on the Key Diagram and should be deleted as green belt serves this purpose.</p> <p>Need clear evidence to support the general locations for growth in terms of their relative impact on the purposes of the Green Belt. Suggests there is a lack of joined up thinking between the Preferred Options in H1 and H2 and that in GB1.</p> <p>In addition to the need to amend the Green Belt boundary to facilitate the selected General Locations, it is considered that a wider review of Green Belt boundaries should also be undertaken. Suggest that there are many small scale opportunities to adjust and rationalise the Green Belt boundary which would enable various small sites to come forward without material</p>

	conflict with the purposes of the Green Belt such as Church Road, Hockley, where a more appropriate urban edge could be defined.
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Rural Diversification, Green Tourism and Recreational Uses	
Agent	Summary of representation(s)
Iceni Projects Ltd (representing Colonnade Land LLP)	Colonnade would promote the inclusion of an affordable housing exception policy within the Core Strategy.
Edward Gittins & Associates (representing Crowstone Properties Ltd)	Support the Council's aims to promote and secure a vibrant and prosperous countryside and one that encourages recreational uses. The opportunities for formal and informal recreational provision on the urban fringe (particularly development adjacent to the green belt) should be one of the determining factors in the selection of locations for growth and subsequently at the Site Allocations DPD stage.
Edward Gittins & Associates (representing Mr Dudley Ball)	Support the Council's aims to promote and secure a vibrant and prosperous countryside and one that encourages recreational uses. The opportunities for formal and informal recreational provision on the urban fringe (particularly development adjacent to the green belt) should be one of the determining factors in the selection of locations for growth and subsequently at the Site Allocations DPD stage.

Preferred Option GB2 – Rural Diversification and Recreational Uses	
Agent	Summary of representation(s)
Whirledge and Nott (representing Whirledge & Nott)	The proposal is in conflict with PPS7 and will do nothing to encourage the rural economy. It is accepted that the government supports re-use of rural buildings however this policy sets out in its first sentence 'a restrictive approach' in direct conflict. Most diversification proposals are on developed land and as such have no impact on the openness of the Green Belt. Wider sustainability issues should not focus solely on transport.
Charles Planning Associates (representing Swan Hill Homes Ltd)	Swan Hill generally supports the Council's policy approach towards rural diversification and provision of recreational uses within the Green Belt.
John H Bayliss Ltd (representing Mr & Mrs Wilson)	Forms of rural diversification that will be considered acceptable in appropriate circumstances in the Green Belt include:

	<p>Conversion of existing buildings for small scale employment use Green Tourism Outdoor recreation and leisure activities Conversion of buildings to bed and breakfast /hotels</p>
Andrew Martin Associates (representing M D Smith & Son)	<p>Forms of rural diversification that will be considered acceptable in appropriate circumstances in the Green Belt include:</p> <ul style="list-style-type: none"> . Conversion of existing buildings for appropriate employment use, particularly on larger previously developed sites that are able to contribute to sustainable job creation . Green tourism (crossed out/deleted) . Outdoor recreation and leisure activities . Conversion of buildings to bed and breakfasts/hotels
A W Squier Ltd	PPS7 is more supportive of Diversification of rural assets than the Core Strategy.

Summary of Agents Comments on the Economic Development Chapter

Introduction – Economic Development	
Agent	Summary of representation(s)
Edward Gittins & Associates (representing Crowstone Properties Ltd)	<p>Do not consider the document sufficiently recognises the need to adopt a strategy which seeks to make the District more self-contained and hence more sustainable.</p> <p>Suggests that the level of out commuting stated represents a very heavy reliance on employment beyond the District's boundaries. The District is therefore highly unsustainable in this particular respect.</p> <p>Suggest that in addition to employment growth stimulated via Thames Gateway South Essex and Southend Airport, smaller and more localised initiatives need to develop to reduce commuting time and reduce reliance on employment outside the district.</p> <p>Welcome the initiatives set out to deliver</p>

	<p>increased employment provision to meet the needs of the District and its growing population over the plan period.</p> <p>Suggest that housing and employment should be considered jointly to ensure the best possible "fit" which would encourage new and more accessible employment opportunities and improve the soundness of the Plan.</p>
Edward Gittins & Associates (representing Mr Dudley Ball)	<p>Do not consider the document sufficiently recognises the need to adopt a strategy which seeks to make the District more self-contained and hence more sustainable.</p> <p>Suggests that the level of out commuting stated represents a very heavy reliance on employment beyond the District's boundaries. The District is therefore highly unsustainable in this particular respect.</p> <p>Suggest that in addition to employment growth stimulated via Thames Gateway South Essex and Southend Airport, smaller and more localised initiatives need to develop to reduce commuting time and reduce reliance on employment outside the district.</p> <p>Welcome the initiatives set out to deliver increased employment provision to meet the needs of the District and its growing population over the plan period.</p> <p>Suggest that housing and employment should be considered jointly to ensure the best possible "fit" which would encourage new and more accessible employment opportunities and improve the soundness of the Plan.</p>

London Southend Airport and Environs	
Agent	Summary of representation(s)
Strutt & Parker (Mr G Marshall)	<ul style="list-style-type: none"> • the airport is recognised as an important driver of inward investment and regeneration in the Thames Gateway; • the airport is potentially an excellent transport interchange with an airport railway station and six to ten rail services into London Liverpool Street per hour. The transport characteristics of the location will be enhanced with the advent of the station. in terms of enhanced bus service links with the station:

	<ul style="list-style-type: none"> • The airport currently has around 10 acres of land that it has earmarked for airport related development. <p>4.5 The airport together with the new rail station will become a significant catalyst for growth in this area. which is not fully recognised in the Preferred Options document. but which is a commercial inevitability based on the experience of airports elsewhere.</p>
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Preferred Option ED1 – London Southend Airport	
Agent	Summary of representation(s)
Firstplan (representing C&S Associates)	Supports JAAP. Important the the potential of the area is recognised in the Core Strategy and Policy ED1.
Iceni Projects Ltd (Colonnade Land LLP)	<p>Colonnade supports the identification of London Southend Airport in providing a significant role for the economic development of the District. The policy does not provide any indication of the number of jobs it will provide within the Plan period.</p> <p>Recommend Three Ashes as employment land connected to the Airport.</p>
Savills (Martin Dawn Plc)	<p>- Martin Dawn Plc [5263] (represented by Savills (Ms M Power) [8301]) SUPPORT Paper - 18/12/08 Core Strategy Preferred Options (Revised October 2008): ED1 London Southend Airport - Preferred Option ED1 London Southend Airport Preferred Option S - 4440 - 5263 - ED1 London Southend Airport - Preferred Option -</p>
Preferred Option ED2 – Employment Growth	
Agent	Summary of representation(s)
Kember Loudon Williams Ltd (representing Barratt Eastern Counties)	The preferred option is supported since it is important that the economy does not focus on a single employment provider in the form of an airport but diversifies.
Andrew Martin Associates Ltd (representing MD Smith & Son)	Policy ED2 should not discount the provision of alternative sites that would make use of previously developed land and could contribute towards sustainable employment opportunities, provided they would meet the general aims of policy ED4 as part of a mixed use development or for employment uses.
Iceni Project Ltd	Colonnade agrees that Rochford's economy

(representing Colonnade Land LLP)	<p>must diversify and modernise through the growth of existing businesses and through the creation of new enterprises.</p> <p>The policies of the Green Belt chapter should reflect the requirement for Green Belt releases and in accordance with policy 2.12 of PPG2, consideration should be given to the identification of additional safeguarded land to meet employment and job targets to allow flexibility and ensure Green Belt policies do not put employment delivery at risk.</p>
Countryside Properties (Southern) Ltd	This policy (or supporting text) gives no indication of intended employment delivery for the plan period
Bidwells (representing H R Philpot & Sons (Barleylands) Ltd)	<p>Supports the opportunity of introducing new employment land within the district.</p> <p>Suggests that the proposed housing growth would deliver suitable infrastructure and community facilities as well as the employment growth target.</p> <p>Suggests that employment land allocation should be included in the Core Strategy Preferred Option stage to help ensure their achievability with regards to the housing development.</p>

Alternative Option ED2 – Employment Growth

Agent	Summary of representation(s)
Countryside Properties (Southern) Ltd	We support the principle/policy of providing a range of employment uses across the District rather than focus on provision purely at London Southend Airport.

Preferred Option ED3 – Existing Employment Land

Agent	Summary of representation(s)
Christopher Wickham Associates (representing Inner London Group)	The review of existing employment land requirements, and the reallocation of sites for housing, where appropriate, is fully supported.
Kember Loudon Williams Ltd (Barratt Eastern Counties)	<p>The policy is at odds with the wider objectives of Policy ED2</p> <p>The alternative option should be considered more thoroughly</p>

Preferred Option ED4 – Future Employment Allocations

Agent	Summary of representation(s)
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Andrew Martin Associates Ltd (representing M D Smith & Son)	Objects to policy
Iceni Projects Ltd (representing Colonnade Land LLP)	The policy indicates that only one new location for employment should be carried forward, located on land to the South of London Road, Rayleigh, and otherwise relies solely on the Airport to deliver the required employment land within the District. Three Ashes Farm provides an excellent opportunity to deliver employment growth in the short term. Cross-referencing to the Employment Land Study should be provided within this chapter in order to demonstrate that more information has been issued on the consideration of general locations for employment land.
Countryside Properties (Southern) Ltd	We support the principle of a new employment allocation west of Rayleigh.
Countryside Properties (Southern) Ltd	However, we consider that the future employment allocation be north of London Road, not south of London Road.

Alternative Option ED4 – Future Employment Allocations

Agent	Summary of representation(s)
Countryside Properties (Southern) Ltd	We argue that an employment allocation north of London Road could be provided which is no closer to existing residential areas than any allocation south of London Road

Preferred Option ED5 – Eco Enterprise Centre

Agent	Summary of representation(s)
Countryside Properties (Southern) Ltd	We support the proposal to develop an eco-enterprise centre or business incubation centre. However, the deliverability of an eco-enterprise centre will be a key issue.

Summary of Agents Comments on the Environmental Issues Chapter

Preferred Option ENV1 – Protection and Enhancement of the Natural Landscape and Habitats	
Agent	Summary of representation(s)
Colliers CRE (representing Aber Ltd)	It is important that development is directed away from the sites of international, national and local nature conservations importance and support the implementation of the Crouch and Roach Management Plans.
Edward Gittins & Associates (representing Crowstone Properties Ltd)	Support the continuing protection of the District's natural landscape and habitats. Endorse the Preferred Options in ENV1 and ENV2. Consider some of the protective notations are sufficiently important to be

	denoted on the Key Diagram.
Edward Gittins & Associates (representing Mr Dudley Ball)	Support the continuing protection of the District's natural landscape and habitats. Endorse the Preferred Options in ENV1 and ENV2. Consider some of the protective notations are sufficiently important to be denoted on the Key Diagram.

Preferred Option ENV2 – Coastal Protection Belt

Agent	Summary of representation(s)
Edward Gittins & Associates (representing Crowstone Properties Ltd)	Support the continuing protection of the District's natural landscape and habitats. Endorse the Preferred Options in ENV1 and ENV2. Consider some of the protective notations are sufficiently important to be denoted on the Key Diagram.
Edward Gittins & Associates (representing Mr Dudley Ball)	Support the continuing protection of the District's natural landscape and habitats. Endorse the Preferred Options in ENV1 and ENV2. Consider some of the protective notations are sufficiently important to be denoted on the Key Diagram.
Bidwells (representing H R Philpot & Sons (Barleylands) Ltd)	Suggests that the proposed location of the costal protection belt along part of the western boundary does not conform to the local topography and has therefore included land that could be considered for part development. At the detailed stage, the positioning of the coastal protection belt need to take into consideration a potential school and limited housing growth to the north west as indicated on the attached plan.

Preferred Option ENV3 – Flood Risk

Agent	Summary of representation(s)
Colliers CRE (represented Aber Ltd)	The approach to direct development away from areas at risk of flooding is supported.
Charles Planning Associates (Swan Hill Homes Ltd)	Swan Hill supports the preferred option approach towards dealing with settlements at risk of flooding
RW Land & Planning (JF Spencer & Son Ltd)	We welcome the proposal to pursue development in areas which fall into Flood Zone 1 and the use of the sequential test in PPS25.

Preferred Option ENV4 – Sustainable Drainage Systems (SUDs)

Agent	Summary of representation(s)
Charles Planning Associates Ltd (representing Swan Hill Homes Ltd)	In respect of Policy ENV4, Swan Hill supports the general principle of sustainable drainage systems. However, given the difficulties in transferring the future management and operation of SUDs to water companies and local authorities, it is not

	considered appropriate to require the provision of SUDS as a pre-requisite to development in all cases.
RW Land & Planning (Representing JF Spencer & Son Ltd)	SUDS is not always the best environmental option for dealing with drainage. We welcome the viability test intended to identify those sites where SUDS is not appropriate.

Preferred Option ENV5 – Air Quality

Agent	Summary of representation(s)
Iceni Projects Ltd (representing Colonnade Land LLP)	Colonnade support Rochford's aim of securing an Eco-Enterprise Centre within the District and consider Three Ashes to be an excellent location. This would provide a high-quality employment development that may also incorporate uses associated with the Airport. The site would further justify its sustainability benefits by being located within close proximity to the London Southend Airport Railway Station and Rochford Town Centre.

Preferred Option ENV6 – Large Scale Renewable Energy Projects

Agent	Summary of representation(s)
Colliers CRE (representing Aber Ltd)	With major developments the preparation of development briefs should include the requirement to address sustainable layouts and construction, together with the requirement for renewable energy, which dependent on the location should include amongst other things, wind energy, solar power and ground heat

Preferred Option ENV7 – Small Scale Renewable Energy Projects

Agent	Summary of representation(s)
Charles Planning Associates Ltd (representing Swan Hill Homes Ltd)	In respect of Policy ENV4, Swan Hill supports the general principle of sustainable drainage systems. However, given the difficulties in transferring the future management and operation of SUDS to water companies and local authorities, it is not considered appropriate to require the provision of SUDS as a pre-requisite to development in all cases.

Preferred Option ENV8 – Code for Sustainable Homes

Agent	Summary of representation(s)
Colliers CRE (representing	Combined with the use of renewable energy projects, this will assist in reducing carbon dioxide

Aber Ltd)	emissions from new residential developments.
Firstplan (representing Stolkin & Clements LLP)	Support this policy.
Charles Planning Associates (representing Swan Hill Homes Ltd)	However, Swan Hill consider the requirement to achieve Code level 6 by 2013 is unrealistic and whilst Swan Hill recognises the importance of this issue, and the desire for carbon neutral homes, producing this on all new dwellings by 2013 could have significant implications on the cost of developments, viability and deliverability.
Kember Loudon Williams Ltd (representing Barratt Eastern Counties)	Object. The advice from the Department of Communities and Local Government is that the new requirement to have a rating against the Code does not make it mandatory to build a Code home or to have each new home assessed against the Code. Code 6 is unlikely to be unattainable given existing technologies and that achieving code 5 could result in a 12% to 20% increase in costs that would have to be passed onto the consumer.
RW Land & Planning (representing JF Spencer & Son Ltd)	There remains a doubt as to whether Code Level 6 is realistically achievable within the current timescales. Welcome the decision to not pursue the 10% renewable "Merton Rule" as piecemeal renewable energy production is not an efficient approach to its production.

Summary of Agents Comments on the Transport Chapter

Transport - Introduction	
Agent	Summary of representation(s)
Croudace Strategic Ltd	Policy H2 does not accord with the statement that "the only long-term option for Rochford District is to try and reduce the need to travel by car and promote the use of alternative methods of transport".
Strutt & parker Ltd (representing Mr G Marshall)	Recommending a site for development on transport reasons.

Preferred Option T1 – Highways	
Agent	Summary of representation(s)
Colliers CRE (representing	Developments located in sustainable locations

Aber Ltd)	will assist in reducing the need to travel by private vehicles.
Croudace Strategic Ltd	The reference to locating development in such a way as to reduce reliance on the car accords with Government policy, but conflicts with Policy H2 which identifies land at Canewdon, a settlement with few services and poor public transport provision.
Charles Planning Associates (representing Swan Hill Homes Ltd)	Swan Hill supports the overall objectives set out in Policy T1 requiring developments to be located and designed to reduce the reliance on the private car and to meet the infrastructure needs generated by development or seek to help achieve these needs is acceptable in principle. However, Swan Hill considers it important to emphasise that the developer's role should not be seen as a means to meet existing shortfalls in provision.
RW Land & Planning (representing JF Spencer & Son Ltd)	Welcome the objective to locate and design housing developments that reduce the reliance on the private car.
Iceni Projects Ltd (representing Colonnade LLP)	Colonnade supports the principle of improving public transport provision and reducing reliance on the private car. However, it is to be noted that the Core Strategy provides no information on how surface access improvements are to be delivered to London Southend Airport, which is a fundamental caveat for the growth of the Airport, and therefore the District's employment strategy.
Edward Gittins & Associates (representing Crowstone Properties Ltd)	Fully endorse the Preferred Options in T1 Highways and T2 Public Transport.
Edward Gittins & Associates (representing Mr Dudley Ball)	Fully endorse the Preferred Options in T1 Highways and T2 Public Transport.

Preferred Option T2 – Public Transport	
Agent	Summary of representation(s)
Croudace Strategic Ltd	The acknowledgement that development must be well related to public transport is welcomed, but does not accord with Policy H2.
Charles Planning Associates (representing Swan Hill Homes Ltd)	Supports policy.
RW Land & Planning (representing	Welcome the objective developments must be well related to public transport, or accessible by

J F Spencer & Son Ltd)	means other than the private car.
Iceni Projects Ltd (representing Colonnade Land LLP)	Colonnade supports the principle of improving public transport provision and reducing reliance on the private car. The transport and infrastructure implications of the Airport deserve further scrutiny within the Core Strategy.
Mr David Grew (representing Mr David Grew)	Suggests H2 is in direct conflict.
Edward Gittins & Associates (representing Crowstone Properties Ltd)	Fully endorse the Preferred Options in T1 Highways and T2 Public Transport.
Edward Gittins & Associates (representing Mr Dudley Ball)	Fully endorse the Preferred Options in T1 Highways and T2 Public Transport.

Preferred Option T4 – Travel Plans

Agent	Summary of the comment
Charles Planning Associates (representing Swan Hill Homes Ltd)	Supports the policy.

Preferred Option T5 – Cycling and Walking

Agent	Summary of representation(s)
Charles Planning Associates (representing Swan Hill Homes Ltd)	Supports the policy. Site by site assessment is an important consideration.
Strutt & Parker (representing Mr G Marshall)	Peggle Meadow could contribute to the extension of the Prittle Brook Greenway so that it may continue across the borough boundary and link through to further areas of employment and to Rochford Town Centre. It is noted from the Preferred Options diagram that the Prittle Brook Greenway proposal does indeed follow the route through the site that has previously been demonstrated to both Rochford and Sustrans, but does not indicate the site it passes through as being a Preferred Option. Without the release of Peggie Meadow, this route option therefore becomes undeliverable.
Edward Gittins & Associates (representing Crowstone Properties Ltd)	Attention is drawn to the particular opportunities associated with the inclusion of the western side of Ashingdon.

Preferred Option T5 – Cycling and Walking

Agent	Summary of representation(s)
Charles Planning Associates (representing Swan Hill Homes Ltd)	Supports the policy. Site by site assessment is an important consideration.

Strutt & Parker (representing Mr G Marshall)	Peggle Meadow could contribute to the extension of the Prittle Brook Greenway so that it may continue across the borough boundary and link through to further areas of employment and to Rochford Town Centre. It is noted from the Preferred Options diagram that the Prittle Brook Greenway proposal does indeed follow the route through the site that has previously been demonstrated to both Rochford and Sustrans, but does not indicate the site it passes through as being a Preferred Option. Without the release of Peggie Meadow, this route option therefore becomes undeliverable.
Edward Gittins & Associates (representing Crowstone Properties Ltd)	Attention is drawn to the particular opportunities associated with the inclusion of the western side of Ashingdon.

Preferred Option T7 – Parking Standards	
Agent	Summary of representation(s)
Charles Planning Associates (representing Swan Hill Homes Ltd)	Policy should state that the council have adopted supplementary guidance on parking standards.
Planning Potential (representing Fairview New Homes)	Lack of coherence with PPG13 in that parking standards should not be expressed as minimum.
Andrew Martin Associates Ltd (Representing MD Smith & Son)	standards should confirm with PPG13 and not expressed as minimum values. Alternative and sustainable transport options including cycleway and public transport options could justify a lower parking standard and promote sustainable transport options.
Iceni Projects Ltd (Representing Colonnade Land LLP)	Policy must reflect PPG13 to promote sustainable transport choices.

Summary of Agents Comments on the Retail and Town Centres Chapter

Retail and Town Centres – Retail	
Agent	Summary of representation(s)

Indigo Planning (representing Sainsbury's Supermarkets Ltd)	Sainsbury's are interested in pursuing opportunities in the District having identified a requirement to improve foodstore provision. The Council should be more realistic about retail capacity in order to address the issue of leakage and to ensure expenditure is retained within the District.
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Preferred Option RTC1– Retail	
Agent	Summary of the comment
RW Land & Planning (representing J F Spencer & Son Ltd)	Welcomes the designation of Hockley as a district centre and that retail developments will be focussed towards it.

Preferred Option RTC5 – Hockley Town Centre	
Agent	Summary of representation(s)
RW Land & Planning (representing JF Spencer & Son Ltd)	Welcomes the proposals contained within this policy for the improvement of facilities, services and town centre living within Hockley Town centre.

Summary of Agents Comments on the Character of Place Chapter

Preferred Option CP1 – Design	
Agent	Summary of representation(s)
Colliers CRE	New developments should promote good, high

representing Aber Ltd	quality design.
Charles Planning Associates representing Swan Hill Homes Ltd	Policy CP1 seeks to ensure the provision of good, high quality developments that reflect local characteristics and distinctiveness, this ideology is supported by Swan Hill.
Iceni Projects Ltd representing Colonnade Land LLP	The Council should not seek to impose further demands on developers where existing regulations provide sufficient requirements regarding design. In this instance, Design and Access Statements provide sufficient design guidelines for developments.
Savills (Representing Martin Dawn Plc)	Agree that high quality design should be promoted in all developments in accordance with Government objectives.

Summary of Agents Comments on the Community Infrastructure, Leisure and Tourism Chapter

Community Infrastructure, Leisure and Tourism	
Agent	Summary of representation(s)

Strutt & Parker (representing G Marshall)	Promoting site on basis of services in close proximity
Edward Gittins & Associates (representing Crowstone Properties Ltd)	We support the Council's aims to promote and secure a vibrant and prosperous countryside and one that encourages recreational uses
Edward Gittins & Associates (representing Mr Dudley Ball)	We support the Council's aims to promote and secure a vibrant and prosperous countryside and one that encourages recreational uses.

Preferred Option CLT1 – Planning Obligations and Standard Charges	
Agent	Summary of representation(s)
Colliers CRE (representing Aber Ltd)	Planning obligations and standard charges to ensure a reasonable and appropriate contribution is supported.
Charles Planning Associates (representing Swan Hill Homes Ltd)	Swan Hill generally supports the overall approach the Council has taken in Policy CLT1.
Kember Loudon Williams Ltd (representing Barratt Eastern Counties)	Contributions should not be used to make good existing deficiencies in infrastructure provision. Nor are they to be used to secure contributions to the achievement of wider planning objectives that are not necessary for consent to be granted. In that context the Core Strategy should set this out as its policy framework.
RW Land & Planning (representing J F Spencer & Son Ltd)	We welcome the continued use of Planning Obligations to secure reasonable on and off site improvements as set out in Circular 05/2005.
Iceni Projects Ltd (representing Colonnade Land LLP)	The principle of providing for planning gain associated with new development proposals is widely accepted The policy should refer to guidance contained within a Supplementary Planning Document (SPD) and should allow for flexibility to acknowledge reasonable negotiation on s106 agreements to ensure development proposals continue to come forward thereby contributing to deliverability, whilst allowing realistic reductions for marginal schemes.
Savills (representing Martin Dawn Plc)	- Martin Dawn Plc [5263] (represented by Savills (Ms M Power) [8301]) COMMENT Paper - 18/12/08 Core Strategy Preferred Options (Revised October 2008): CLT1 Planning Obligations and Standard Charges - Preferred Option We understand the need for consistency in calculating planning charges, however, are concerned that the standard formula referred to in Policy CLT1 does not allow for flexibility dependant on individual site

	<p>circumstances. The policy states that the requirement to pay standard charges may be reassessed and modified where actual provision of infrastructure or facilities is provided as part of the development. Whilst I agree with this, there needs to be a further comment that where the developer can demonstrate that certain charges are economically unviable there is the potential for negotiation.</p> <p>C - 4445 - 5263 - CLT1 Planning Obligations and Standard Charges - Preferred Option -</p>
Sellwood Planning Ltd (representing Aston Unit Trust and J Needs)	Policy CLT1 is supported as both justified and supportable in the context of delivering the social and physical infrastructure necessitated by growth in the plan area to 2021 and beyond.

Preferred Option CLT3 – Secondary Education

Agent	Summary of representation(s)
Colliers CRE (representing Aber Ltd)	It is important for King Edmund School to expand to accommodate the proposed new dwellings in Ashingdon.
Andrew Martin Associates (representing A W Squier Ltd)	No objection is raised to the principle of expanding King Edmund school.

Preferred Option CLT5 – Open Space

Agent	Summary of representation(s)
Charles Planning Associates (representing Swan Hill Homes Ltd)	Swan Hill supports the need for new residential developments to incorporate a degree of new publicly accessible open space. Standard Charges should be based on thorough public consultation and consideration and sound justification.
Planning Potential (representing Fairview New Homes)	Fairview New Homes strongly object to the requirements set out in preferred Policy CLT5. Whilst the sentiments of the policy are well founded and it is recognised that there is a need to provide public open space throughout the Borough, there is no justification as to why a significant amount of public space will be required in the west of Rayleigh.
Edward Gittins & Associates (representing Crowstone Properties Ltd)	Suggest there are opportunities for providing Open Space for both formal and informal recreation in association with General Locations especially on the edge or within the Green Belt particularly opportunities on the western side of Ashingdon.
Edward Gittins & Associates (representing Mr Dudley Ball)	Suggest there are opportunities for providing Open Space for both formal and informal recreation in association with General Locations

	especially on the edge or within the Green Belt.
Bidwells (representing H R Philpot & Sons (Barleylands) Ltd)	Supports CLT5. Suggests that the Council should carry out an assessment for existing open space where new strategic development is proposed. Suggests that appropriate strategic planting should be introduced to ensure conformity with green belt release, along with other green infrastructures in Hullbridge.

Preferred Option CLT6 – Community Facilities

Agent	Summary of the comment
Charles Planning Associates (representing Swan Hill Homes Ltd)	Supports the policy particular in relation to Great Wakering.

Preferred Option CLT7 – Play Space

Agent	Summary of representation(s)
Charles Planning Associates (representing Swan Hill Homes Ltd)	Supports policy but it should be based on thorough public consultation and consideration and sound justification.

Preferred Option CLT8 – Youth Facilities

Agent	Summary of the comment
Charles Planning Associates (representing Swan Hill Homes Ltd)	Supports policy but it should be based on thorough public consultation and consideration and sound justification.

Preferred Option CLT10 – Playing Pitches

Agent	Summary of representation(s)
Charles Planning Associates (representing Swan Hill Homes Ltd)	Supports policy but it should be based on thorough public consultation and consideration and sound justification.

Summary of Agents Comments on the Upper Roach Valley and Wallasea Island Chapter

Preferred Option URV1 – Upper Roach Valley

Agent	Summary of representation(s)
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Croudace Strategic Ltd	It is wholly unrealistic to suggest that such a large area of land could be Compulsorily Purchased and thus this approach is highly unlikely to achieve the objectives of this policy.
Whirledge and Nott (representing Rankin Farms)	Object to expansion by Compulsory Purchase
Whirledge & Nott (representing Mr Roger Smith)	we object to the proposal to expand Cherry Orchard Jubilee Country Park by compulsory purchase where necessary. This area should be maintained as a farmed landscape with enhanced association with the park area by negotiation.

Summary of Agents Comments on the Implementation, Monitoring and Delivery Chapter

Implementation Delivery and Monitoring	
Agent	Summary of representation(s)

Croudace Strategic Ltd	This section should give examples of other ways land can be acquired to expand the Country Park, and the way land can be acquired at all preferred locations.
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Appendix 3 - Summary of issues raised Pre-Submission consultation and initial officer comments

Issue raised	Initial Officer Comments
General / Introduction	
GO East state that the evidence base is comprehensive.	Comment noted.
GO East state that the text in paragraph 1.25 is slightly misleading (although it is still supported) and that the East of England Plan identifies a role for Southend Airport as catering for local and niche markets and being a catalyst for regeneration. GO East state the text in paragraph 2.54 expresses the role of London Southend Airport more clearly and conforms to the East of England Plan.	Comment noted.
It is unclear why the Core Strategy is linked to priorities in the Local Area Agreement, or why an early review is required.	<p>The Core Strategy recognises that the planning system has a role to play in delivering the 10 key priorities that have been identified in partnership between Rochford District, Essex County, and other surrounding Councils in order to achieve the County's vision.</p> <p>It is not the Council's intention to have an early review of the Core Strategy. The Core Strategy's effectiveness will be monitored and reviewed where necessary.</p>
The Core Strategy text should be amended to make clear that both the Core Strategy and the Local Area Agreement support the Sustainable Community Strategy.	Comment noted.
The Core Strategy would result in no social or economic benefits.	The Sustainability Appraisal identifies an array of social, economic and environmental benefits which the Core Strategy will engender.
Community involvement in the Core Strategy was inadequate.	The Council has gone beyond the requirements of the regulations and undertaken a significant amount of community involvement in the development of the Core Strategy, as set out in the Consultation Statement.
It is unclear that the Core Strategy is	The Council has developed a Core

Issue raised	Initial Officer Comments
deliverable.	Strategy which is deliverable, as set out within the Core Strategy itself and supporting documents.
Alternative strategies have not been considered.	The production of the Core Strategy has been an iterative process, with numerous options considered and appraised at the various junctures.
Housing	
The delivery of sites in five years should be carefully considered and adhere to PPS3.	Comment noted. The Core Strategy delivers the required supply of land, in the required time, and in accordance with PPS3.
It is unclear how settlements are determined to be viable, although paragraph 4.8 provides some criteria.	The supporting evidence base and Core Strategy document itself, in particular the Spatial Characteristics, Issues and Opportunities section, set out the characteristics of the District's settlements.
Support the approach to sustainable development and focusing housing development in the higher tier settlements, with a proportion of new housing in lower tier settlements.	Comment noted.
Object to loss of Green Belt	The evidence base shows that the District's housing requirement cannot be fully met without some reallocation of Green Belt land. However, the Core Strategy also states that only the minimum amount of Green Belt land should be developed.
Object to increase in traffic congestion	The Core Strategy seeks to address the issues of highway through a multi-pronged approach of directing development to locations where alternatives to the private car are available (or where the implementation of such alternatives are viable), directing development to areas where highway infrastructure is available, and requiring additional highway infrastructure to be implemented. The production of the Core Strategy has involved consultation with Essex County Council Highways

Issue raised	Initial Officer Comments
	Authority and their views have been incorporated.
Support the fact that the Core Strategy acknowledges the need to reallocate part of the Green Belt in order to accommodate the District's housing requirement.	The evidence base shows that the District's housing requirement cannot be fully met without some reallocation of Green Belt land. However, the Core Strategy also states that only the minimum amount of Green Belt land should be developed.
Proposals are unsustainable.	The Sustainability Appraisal states that "The actual locations for growth proposed in the policy are considered to be the most sustainable options available, within the context of the overall high levels of population growth being proposed in the East of England Plan" (paragraph 5.17).
The Core Strategy is inflexible, contrary to PPS12, is not able to handle contingencies and thus is unsound. Several large planning applications have been submitted and the Core Strategy does not indicate how these will be handled.	<p>Policies H1, H2 and H3 do not quote exact quantum of development for any location or site, and contain a degree of flexibility so as to ensure that any changes to the housing development supply change can be accounted for.</p> <p>Proposed policies within the Core Strategy should not be altered simply because planning applications which are in conflict to the emerging Core Strategy are submitted during the DPD production process.</p>
The Core Strategy should plan for the provision of housing to 2026 at the earliest.	The Core Strategy's projected adoption date is 2010 and it is required to show a 15-year housing supply. It would not be appropriate to go beyond this date, given uncertainties as to what the District's housing requirement will be beyond 2021 and, particularly, the level of environmental constraints the District is subject to.
Dwellings were earmarked for South West Rayleigh in the Core Strategy Preferred Options, but the location is not identified within the Submission Document.	The Core Strategy Preferred Options was an iteration of the Core Strategy published for consultation and appraisal. It did not represent final policy. One of the concerns expressed over the

Issue raised	Initial Officer Comments
	<p>Revised Preferred Options was the quantum of development suggested for greenfield sites. Accordingly the quantum of development for both North of London Road and South West Rayleigh have been reduced. In the case of South West Rayleigh, the figure can be reduced to a level that no Green Belt land is required to be released there, ensuring that Green Belt land is protected at this location whilst enabling the Council's balanced approach to the distribution of housing to be deliverable. The location North of London Road is considered more sustainable and more viable (particularly with regards to the delivery of infrastructure), and fits better with the balanced strategy to housing distribution.</p> <p>The Sustainability Appraisal states that "The actual locations for growth proposed in the policy are considered to be the most sustainable options available, within the context of the overall high levels of population growth being proposed in the East of England Plan" (paragraph 5.17).</p>
<p>Individual sites have not been properly considered.</p>	<p>The Core Strategy is a strategic document and does not allocate specific sites for development. The SHLAA demonstrates that there are sufficient, deliverable sites within the general locations identified in the Core Strategy. The Allocations Development Plan Document will determine the specific sites for development.</p>
<p>Too much development is proposed for Rawreth Parish and Parish boundaries have been ignored.</p>	<p>Residential development proposed that has the potential (depending on specific sites ultimately allocated) to fall within Rawreth Parish include the general locations of North of London Road, Rayleigh and South West Hullbridge. These locations adjoin the existing settlements of Rayleigh and Hullbridge, respectively. Both locations would be functionally separate from what is</p>

Issue raised	Initial Officer Comments
	<p>described as the old centre of the Parish in the Rawreth Parish Plan.</p> <p>Parish boundaries do not necessarily correspond to the functional geography of places. It would not be sound to base the Core Strategy on arbitrary political boundaries.</p> <p>The Sustainability Appraisal states that "The actual locations for growth proposed in the policy are considered to be the most sustainable options available, within the context of the overall high levels of population growth being proposed in the East of England Plan" (paragraph 5.17).</p>
<p>Development North of London Road, Rayleigh would result in unrestricted sprawl up to the A1245.</p>	<p>The amount of land required to accommodate the stated number of dwellings at this location would mean that there would still be a significant area of Green Belt between the development and the A1245. In order to ensure that the Green Belt continues to prevent sprawl, the Core Strategy proposes that residential development at the location land North of London Road, Rayleigh be accompanied by public park land between the development and the A1245.</p>
<p>The Core Strategy fails to consider all brownfield sites.</p>	<p>The Council have ascertained the number of dwellings that can be delivered on suitable brownfield sites within the plan period, in accordance with PPS3.</p>
<p>No costs have been shown for the necessary infrastructure, or who will deliver it.</p>	<p>The Delivery, Implementation and Monitoring chapter sets out how infrastructure will be implemented. Indicative costs are set out in a separate supporting document.</p>
<p>General locations shown for residential development have inadequate infrastructure / services / facilities to cope with such proposals.</p>	<p>The general locations chosen have been identified accounting for the current provision of infrastructure and the potential for additional infrastructure to be provided.</p>

Issue raised	Initial Officer Comments
	<p>The Core Strategy acknowledges the need for additional infrastructure and sets out policies accordingly.</p>
<p>South Hawkwell is not an appropriate location for development as it does not meet the requirements of PPS12.</p> <p>South Hawkwell is not an appropriate location for the following reasons: limited public transport; inability to improve local highways; congestion; distance from shops; distance from train stations; semi-rural location; loss of character; loss of Green Belt; loss of wildlife; lack of social, environmental and economic benefits.</p>	<p>The Core Strategy sets out a balanced approach to the distribution of housing, and proposes additional infrastructure accompanies new development.</p> <p>The Sustainability Appraisal states that "The actual locations for growth proposed in the policy are considered to be the most sustainable options available, within the context of the overall high levels of population growth being proposed in the East of England Plan" (paragraph 5.17).</p>
<p>There should not be any additional housing in Rayleigh. Rayleigh has accommodated significant amounts of development in recent years.</p>	<p>Rayleigh is the largest settlement in the District, with good access to facilities, services and infrastructure compared to many of the District's settlements. It is also subject to the greatest housing need of any settlements in the District, based on housing waiting lists.</p> <p>The Core Strategy recognises that it is appropriate for other settlements to accommodate additional housing development.</p> <p>The Sustainability Appraisal states that "The actual locations for growth proposed in the policy are considered to be the most sustainable options available, within the context of the overall high levels of population growth being proposed in the East of England Plan" (paragraph 5.17).</p>
<p>More schools are needed to account for additional residential development.</p>	<p>The Core Strategy addresses this issue.</p>
<p>Loss of facilities for elderly and disabled people resulting from new housing development.</p>	<p>Additional housing development would not result in the loss of such facilities. The Core Strategy proposes that additional community facilities accompany new residential development.</p>

Issue raised	Initial Officer Comments
<p>Intensification of existing settlements should be maximised before Green Belt locations are considered for development.</p>	<p>The Council have ascertained the number of dwellings that can be delivered within existing settlements within the plan period, in accordance with PPS3.</p> <p>In addition, there is concern as to the impact intensification is having on the character of the District's settlements, and on the provision of infrastructure.</p>
<p>The Environment Agency object to residential development at Stambridge Mills, advocated by Policy H1, on the grounds that the site is in Flood Zone 3 and the Council has provided insufficient justification as to why it should be preferred over sites in Flood Zone 1. In addition, the SFRA is not PPS25 compliant.</p> <p>The Council should also seek to provide clear and transparent justification of the LPAs decisions by carrying out a Sequential Test to support this Core Strategy document. At this stage in the development of the LDF, in the absence of an up-to-date SFRA, this would have to be based upon the Environment Agency's flood maps (future iterations for more detailed DPDs would require an up-to-date SFRA). Applying the PPS25 Sequential test will allow for all of the available alternatives to be properly assessed, including justification for the Council's decision to prioritise brownfield development in areas of flood risk when some Green Belt land in areas of lesser flood risk is already being released, or development densities could be increased in other areas.</p>	<p>The Council has provided further justification in respect of this issue in Topic Paper 1.</p>
<p>West Rochford is not an appropriate location for development.</p>	<p>The Sustainability Appraisal states that "The actual locations for growth proposed in the policy are considered to be the most sustainable options available, within the context of the overall high levels of population growth being proposed in the East of England</p>

Issue raised	Initial Officer Comments
The phasing of residential development is not appropriate. The figures and locations should be expressed as being for the plan period, and not broken down into timescales. The phasing of sites is not justified.	Plan" (paragraph 5.17). Phasing of development is required to ensure that the necessary infrastructure can be delivered in a timely manner alongside development, this is particularly important with regards to water supply.
The sustainability of directing housing development to smaller settlements of Canewdon, Great Wakering and Hullbridge is questioned.	The Core Strategy directs a proportion of the District's housing allocation to these smaller settlements to ensure these established communities can be sustained and that rural services continue to be supported. This approach is supported by the Sustainability Appraisal.
General locations for extensions to residential envelopes identified in the Core Strategy could accommodate more than the quantum specified.	It is important that only the minimum amount of Green Belt is reallocated for development.
The SHLAA was not available during the consultation period.	The Local Development Framework evidence base is continuously updated. The relevant information from the SHLAA with regards to the Core Strategy was imbedded within the Core Strategy document itself, particularly on pages 39 and 40. The schedule of sites that comprised the housing supply for the SHLAA was made available.
Loss of high-quality agricultural land	The impact on high quality agricultural land has been a consideration in determining the locations for development in the Core Strategy. The majority of Grade 1 agricultural land is located in the south east of the District and will be unaffected by residential development.
New residential developments will harm the character of existing settlements.	The Core Strategy contains policies which will ensure new development respects the character of existing settlements.

Issue raised	Initial Officer Comments
<p>Alternative general locations for development are preferable to those stated in Core Strategy / could be developed in addition to those stated. Lack of justification for general locations chosen.</p>	<p>The production of the Core Strategy has been an iterative process and a plethora of options have been considered and appraised through the process, resulting in the locations identified in the Core Strategy.</p> <p>The strategy and justification for the general locations identified in the Core Strategy is set out within the document itself.</p> <p>In addition, the Sustainability Appraisal states that "The actual locations for growth proposed in the policy are considered to be the most sustainable options available, within the context of the overall high levels of population growth being proposed in the East of England Plan" (paragraph 5.17).</p>
<p>Locations identified are not specific enough</p>	<p>The Core Strategy is a strategic document and does not allocate specific sites. The Allocations Development Plan Document, which will conform to the Core Strategy, will fulfil this role.</p>
<p>Locations identified are too specific</p>	<p>The Core Strategy does not specify specific sites, but does give an indication of general locations as these are considered to have strategic implications.</p>
<p>Reference to "South Hawkwell" is misleading as the general location identified is within the District Council Electoral Ward of Hawkwell West</p>	<p>South Hawkwell refers to the extension of the residential envelope of Hawkwell to the south. As such the description is considered entirely appropriate. In addition, the Key Diagram illustrates the location.</p>
<p>Locations identified for the expansion of residential envelopes would result in the coalescence of settlements.</p>	<p>The need to avoid coalescence has been a consideration in determining general locations for development, and residential development can be accommodated within the identified locations without coalescence occurring.</p>
<p>The policy only requires 35% of housing</p>	<p>The target for 35% affordable housing is</p>

Issue raised	Initial Officer Comments
<p>to be affordable on developments with 15 or more units. As a result, the lack of any requirement for smaller developments will mean that overall less than 35% of new housing will be affordable, and the regional requirement will not be met. The target also needs to take into account those larger developments where for reasons of economic viability the requirement cannot be met.</p>	<p>a regional one, expressed in the East of England Plan (2008). EERA have confirmed that the Core Strategy is in general conformity with the East of England Plan.</p> <p>The Core Strategy policy on affordable housing is flexible in order to account for issues such as economic viability.</p>
<p>An affordable housing economic viability assessment should be undertaken to inform the appropriate percentage for affordable housing. 35% may not be viable.</p>	<p>The percentage for affordable housing has been determined having regard to the East of England Plan and the Thames Gateway South Essex Strategic Housing Market Assessment.</p> <p>The Core Strategy policy on affordable housing allows for the percentage to be relaxed in cases where the requirement would render development economically unviable. Recent High Court rulings, such as in the case of Barratt Developments Plc v Wakefield MDC, have confirmed that a flexible approach which allows for negotiations at the planning application stage is appropriate and allows for variations in economic viability.</p>
<p>The make up of affordable housing should be determined at the time at which a detailed masterplan or planning application is considered for a site based on identified affordable housing needs at that time.</p>	<p>Comment noted. Policy H4 includes the following: "The Council will constantly review the affordable housing needs of the District and developers should consult with the Council's Housing Strategy team to ensure their proposals meet the Council's needs before submitting planning applications."</p>
<p>The circumstances in which the requirement for 35% affordable dwellings is relaxed should be expanded upon.</p>	<p>The Council considers that the Core Strategy provides sufficient detail in policy H4.</p>
<p>Provision of houses, as opposed to flats, is supported.</p>	<p>The Core Strategy seeks to provide a mix of house types.</p>
<p>Canewdon Parish Council wish to seeing housing in the village that would allow the next generation and older people</p>	<p>Comment noted. This issue is pertinent to all areas of the District, and one of the reasons why the provision of a mix of</p>

Issue raised	Initial Officer Comments
downsizing to reside in the village if they wish. New housing should not simply consist of four bed executive houses.	housing that reflects local need is supported by the Core Strategy.
The requirement for some affordable housing to be provided in the form of three-bedroom dwellings is too prescriptive.	The Council does not believe that the policy is overly prescriptive, as it does not state what proportion must be three-bedroom dwellings.
The requirement for all homes to meet the Lifetime Homes Standard is overly onerous.	<p>Lifetime Homes are suitable for people throughout their lives and by ensuring that homes meet this standard, residents will be able to remain independent as they get older, or develop physical disabilities. All residents will age and anyone's circumstances can change. As such it would not be appropriate for only a proportion of new housing development to be flexible to meet people's changing circumstances.</p> <p>Whilst not everybody will require a home that meets the Lifetime Homes Standard, nobody can guarantee that they will never need such a home and dwellings that meet the Lifetime Homes Standard are not unsuitable for anyone.</p> <p>It is little more difficult at the design stage to achieve the Lifetime Homes Standard over the requirements of the Building Regulations.</p> <p>It is noted that neighbouring Chelmsford Borough Council's Core Strategy, which has been found sound and adopted, states that all new housing developments should seek to meet the Lifetime Homes Standard.</p>
There is no need for a policy on Gypsies and Travellers.	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.
It has been questioned whether the	The Core Strategy seeks to provide the

Issue raised	Initial Officer Comments
provision of 15 Gypsy and Traveller pitches is enough.	required Gypsy and Traveller accommodation to meet need and the requirements of the East of England Plan.
GO East note that the East of England Plan requires a 3% compound increase in the provision of Gypsy and Traveller pitches after 2011. There is no Core Strategy commitment to providing post-2011 Gypsy and Traveller accommodation, merely a statement that additional pitches will be subject to a further review of need.	The Core Strategy seeks to provide the required Gypsy and Traveller accommodation to meet need and the requirements of the East of England Plan.
Character of Place	
It is unclear whether it is the adoption of modern materials and design, or the erosion of character that "must not be allowed".	In some cases the use of modern building materials and building design, as stated in the text, can lead to the erosion of character. Thus the use of appropriate materials and design need to be promoted to prevent further erosion to character.
"The Council will reintroduce a Local List for the District" (paragraph 5.18) is a statement of policy. Its supportive text should explain about the protection the SPD will give to local buildings with special architectural and historic value.	Comment is noted. This is explained in paragraphs 5.19 and 5.20.
PPS3 requires that new development should maintain and improve local character. However the proposals for 'Land north of London Road' would damage the character and identity of the parish, for example loss of Green Belt, the rural character and sprawl disconnecting people from the town. The Sustainability Appraisal recognises that development in this location would have "A significant negative effect on community and identity". Smaller brownfield sites should be developed instead.	The proposed general location 'north of London Road' forms part of the Council's balanced strategy (as identified on page 35). The general locations identified in the Core Strategy Submission document are considered to be the most sustainable general locations, given the alternatives as supported by the Sustainability Appraisal. The Sustainability Appraisal states that "The actual locations for growth proposed in the policy are considered to be the most sustainable options available, within the context of the overall high levels of population growth being proposed in the East of England Plan" (paragraph 5.17). Only a small proportion (the minimal amount necessary) of the Green Belt to

Issue raised	Initial Officer Comments
	<p>the 'north of London Road' will be released. This location also affords the opportunity to provide an important green space buffer between this area and the A1245. The suggestion to develop smaller sites was considered in the Core Strategy Issues and Option document. The strategically located brownfield sites which are considered appropriate for residential development within the District have been identified in the Submission document. As such other areas, for example within Rawreth village, which is identified in the Core Strategy Submission document as a fourth tier settlement, are not considered to be sustainable in the balanced approach undertaken by the Council. This is recognised by GO-East (rep no 15971) who acknowledge that "Local rates of new development on PDL will diverge from the national target according to circumstances in each authority. Some sites are not necessarily suitable for housing".</p>
<p>With respect to the requirement to produce and adhere to Development Briefs for large residential developments, as set out in Policy CP1, the Council should not seek to impose further demands on developers where existing regulations provide sufficient requirements regarding design. In this instance, Design and Access Statements provide sufficient design guidelines for developments and there is no additional information provided in the policy or supporting text that clearly sets out the justification for this requirement.</p>	<p>Development Briefs add to the process above that of Design and Access Statements. Through an inclusive process of public involvement, Development Briefs can ensure that large residential developments meet the needs of the local community.</p>
<p>The previous Local List has been dropped supposedly due to Government guidance and many buildings of local historical or architectural importance have been lost, particularly in Hockley. These have been replaced by housing which is unaffordable and unsuitable. The Local List is now being reintroduced</p>	<p>Local Lists do not afford statutory protection to buildings/street furniture on the list. The Council is introducing the Local List, as stated on page 62 which emphasises the local importance of such a list, having regard to Government guidance. Potential impact on the buildings/street furniture included on the</p>

Issue raised	Initial Officer Comments
because of Government guidance.	list will be considered at the planning application stage, and the Council will work with owners to ensure an appropriate outcome.
Green Belt	
Major developed sites have not been considered in the Core Strategy in accordance with PPG2 Annex C.	This issue was not raised in the previous consultations. The issue of major developed sites, however, has been addressed elsewhere in the Core Strategy Submission document, for example Baltic Wharf in the Economic Development chapter.
Much of the District's Green Belt land is situated to the east of the District, however, the majority of the Green Belt to be reallocated is to the west of the District, for example 'north of London Road' which is considered to be disproportionate.	Rayleigh is the District's largest settlement. Despite a significant amount of Green Belt land to the east of the District, these areas also have the most physical constraints such as accessibility, infrastructure and numerous sites which are of international, national and local nature conservation importance. Having regard to these constraints and the hierarchy of settlements (of which Rayleigh is identified as a 1st tier settlement), the Council has sought to achieve a balanced approach with the allocation of the general areas proposed. These are considered to be the most sustainable general locations, given the alternatives as supported in the Sustainability Appraisal. It is stated that "The actual locations for growth proposed in the policy are considered to be the most sustainable options available, within the context of the overall high levels of population growth being proposed in the East of England Plan" (paragraph 5.17). Furthermore only a small proportion of the Green Belt will be released.
Whilst the Council will continue a restrictive approach towards employment growth in the Green Belt this appears to contradict Policy ED4 that advises that certain locations will be released to accommodate new employment sites to compensate for the loss of locations in	Whilst the Council will continue to be restrictive towards development in the Green Belt, as set out in policy GB1 and GB2, appropriate forms of rural diversification are supported, having regard to PPG2 and potential impact on the openness and character of the

Issue raised	Initial Officer Comments
the existing settlements.	Green Belt. Further detail to employment in the Green Belt will be set out in the emerging Development Management Development Plan Document. As stated in policy ED3 the Council seek to locate existing 'bad neighbour' employment sites to better strategic locations elsewhere in the District having regard to the findings of the Employment Land Study, as set out in policy ED4.
The word "restrictive" should be removed and the Council should work more with landowners and the rural economy to support and promote more employment. This has been a growth area in recent years and could be better promoted to creating additional rural employment.	The Council seeks to maintain its restrictive approach in accordance with PPG2, however, as stated in both Policy GB1 and GB2, the Council will support suitable forms of rural diversification, balancing this against potential impact on the openness and character of the Green Belt. Additional detail will be provided within the emerging Development Management Development Plan Document.
There has been too much development in Rayleigh already and further proposed development would affect the rural identity and character of Rawreth. Such development cannot be supported by existing infrastructure especially the roads.	The proposed general location 'North of London Road' forms part of the Council's balanced strategy for the distribution of housing across the District (page 35 of the Submission Core Strategy). Rayleigh is a first tier settlement (page 40) and has the best access to services. However, it is recognised that additional housing cannot be supported within the capacity of existing infrastructure, and accordingly the Council identifies additional infrastructure requirements to accommodate the housing proposed for this general area (see Appendix H1 page 51). The funding for this infrastructure can be found in Appendix CLT1 on page 99-100. It should be noted that this infrastructure list also proposes a public park which will provide a green buffer between the proposed western extension to the settlement of Rayleigh and the A1245. The Core Strategy respects the character of the existing area, the majority of which will be retained, with the minimum amount of Green Belt

Issue raised	Initial Officer Comments
	being reallocated.
<p>Green Belt release proposed in the Housing chapter is not appropriate. Development in the Parish of Rawreth should take place on brownfield land within the village of Rawreth rather than on greenfield land to the west of Rayleigh.</p>	<p>The issue of creating a new settlement was considered in the early stages of the LDF in the Core Strategy Issues and Options document, having regard to consultation responses this has not been continued through the preparation of the document. The general locations relate to the Council's balanced approach to housing allocations within the District as detailed in the Core Strategy. As supported in the Sustainability Appraisal "The actual locations for growth proposed in the policy are considered to be the most sustainable options available, within the context of the overall high levels of population growth being proposed in the East of England Plan" (paragraph 5.17). Furthermore the village of Rawreth itself, is considered a fourth tier settlement as set out on page 40 of the document, where development is considered unsustainable, whereas the proposed 'North of London Road' general location seeks an extension to the settlement of Rayleigh (a first tier settlement). The quality of the agricultural land in this general location is generally Grade 3 (see SEA Baseline Information Profile).</p>
<p>There appears to be some overlap between both Green Belt policies. There may be an opportunity to combine both into one policy with clear explanatory text.</p>	<p>Comment is noted. Policy GB1, however, sets out the general approach to development in the Green Belt and makes reference to rural diversification, whereas policy GB2 further expands upon the issue of rural diversification, for example appropriate forms in the Green Belt.</p>
<p>Only when every effort has been made to identify brownfield sites for development should Green Belt land be released.</p>	<p>The Council has sought to identify sustainable and deliverable brownfield sites within existing settlements. As noted in comments from GO-East (rep no 15971) "Local rates of new development on PDL will diverge from the national target according to circumstances in each authority. Some</p>

Issue raised	Initial Officer Comments
	sites are not necessarily suitable for housing".
<p>Policy GB1 needs to be amended in order to provide guidance as to how existing brownfield sites within the Green Belt will be dealt with. There are opportunities for these types of sites in the District to be redeveloped for housing in sustainable locations, without encouraging the risk of coalescence of settlements.</p>	<p>Suitable brownfield sites for residential development have been identified in the Core Strategy Submission document, however, the Council seeks to maintain a restrictive approach to managing development in the Green Belt. The Core Strategy has a clear policy towards housing distribution and it is recognised that not all locations are appropriate for housing. PPG2 acknowledges that "the quality of the landscape is not relevant to the inclusion of land within a Green Belt or to its continued protection" (paragraph 1.7). Furthermore policy GB2 states that residential development is not considered an acceptable form of rural diversification in the Green Belt. Further detail will be contained within the emerging Development Management Development Plan Document.</p>
<p>A future release of a small area of Green Belt would not be harmful. The current policy is far too restrictive and precludes this from occurring regardless of potential possible future community benefits. There is an area to the south of Rayleigh which no longer has a Green Belt function, where no coalescence would exist if development takes place plus several community benefits are possible such as a school and permanent local resident access to a nearby public open space and woodland.</p>	<p>The Council seeks to maintain its restrictive approach to development in the Green Belt, in line with PPG2. Such an ad hoc approach would undermine the Council's balanced strategy and would not ensure the provision of infrastructure alongside the development. As stated in Policy H2 "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" and in Policy H3 "The Council will monitor the supply and development of housing in the District and may bring forward development in these locations prior to 2021 if required to meet East of England Plan requirements, but only if infrastructure to serve such developments is also brought forward earlier". As such the Council will adopt a flexible approach to the phasing and reallocation of land for development to ensure a constant 5 year housing supply, which will be</p>

Issue raised	Initial Officer Comments
	<p>monitored through the AMR. Furthermore, development to the south of Rayleigh was considered in the Preferred Options document and was discounted on issues of coalescence, access etc. Such an approach would lead to the incremental erosion of the Green Belt contrary to PPG2.</p>
<p>The policy should be drawn widely enough to permit a fair and open discussion of appropriate land releases at the next stage of the LDF.</p>	<p>The Core Strategy Submission document has identified nine general locations for proposed future development and Green Belt release. As supported in the Sustainability Appraisal "The actual locations for growth proposed in the policy are considered to be the most sustainable options available, within the context of the overall high levels of population growth being proposed in the East of England Plan" (paragraph 5.17).</p>
<p>Policy GB1 does not accord with PPG2. An overall review of the Green Belt should have been carried out and boundaries firmly drawn so they can be maintained.</p>	<p>The Core Strategy set outs the Council's approach to future development in the District, and identifies general locations for development. The emerging Allocations Development Plan Document, which will need to conform to the Core Strategy, will reallocate specific sites within the identified general locations, thus releasing them for development. The sites will be reallocated and defensible boundaries will be drawn in line with PPG2. All other land will remain Green Belt.</p>
<p>The identified general location 'North of London Road' can accommodate more housing than the quantum proposed in the Housing chapter.</p>	<p>It is important that only the minimum amount of Green Belt is reallocated for development.</p>
<p>The identification of locations for housing to the west of Rayleigh and Hullbridge, is contrary to Policy GB1 and the East of England Plan in that these are almost entirely on Green Belt farmland, and alternative brownfield sites are available.</p>	<p>The evidence base confirms that not all of the District's housing requirement can be accommodated on land outside of the Green Belt. The Core Strategy seeks to minimise the amount of Green Belt developed.</p>

Issue raised	Initial Officer Comments
<p>The Core Strategy states that a small proportion of Green Belt land will be allocated for development. How are the allocations for 'north of London Road' and Hullbridge a "small proportion"?</p>	<p>The policies within the Core Strategy will ensure that in the region of 99 percent of the District's Green Belt remains as such.</p>
<p>The land identified as 'North of London Road' meets the 5 objectives of the Green Belt set out in PPG2 in accordance with policy GB1. Alternative brownfield sites in Rawreth village put forward in the Call for Sites would be more appropriate for development.</p>	<p>Development at sites put forward in Rawreth village would be detached and functionally separate from Rayleigh, and would not provide housing for Rayleigh.</p>
<p>The Green Belt chapter does not provide the necessary evidence base that will allow it to be monitored effectively. Employment land will be reallocated for residential use to reduce the quantum of housing proposed in the Green Belt, however, Green Belt will be reallocated to accommodate displaced employment land. Without providing the amount of Green Belt needed to be reallocated policy GB1 cannot be monitored effectively.</p>	<p>This assumes that all employment land is in use, that they are situated in viable, strategic locations for employment uses, and that they make the best use of land in those locations. All these assumptions are incorrect. The Employment Land Study 2008 when read in conjunction with the SHLAA 2009 provides evidence for the Council's approach. As the overarching document of the Council's Local Development Framework it is not the purpose of the document to provide detailed figures for such Green Belt reallocation but to set the strategy for the District. The amount of Green Belt land required to be reallocated for housing and employment uses will be determined through the Allocations Development Plan Document.</p>

Issue raised	Initial Officer Comments
<p>The Highways Authority is concerned that any proposed redevelopment of Green Belt sites could result in development in areas with limited access to sustainable transport modes therefore resulting in higher levels of car usage and subsequent impact on the SRN. Although the Highways Authority recognises that new public transport hubs that would facilitate the use of non-car modes could be developed over time, this process is likely to require very substantial investment.</p> <p>It is therefore important that an appropriate assessment of infrastructure requirements is performed for development sites on Green Belt land. Funding towards the necessary public transport infrastructure improvements must be sought and secured prior to occupation of any new development on Green Belt land. Furthermore, the occupation of such developments should be phased in line with necessary transport infrastructure.</p>	<p>The evidence base confirms that not all of the District's housing requirement can be accommodated on land outside of the Green Belt.</p> <p>The Sustainability Appraisal recognises that "The actual locations for growth proposed in the policy are considered to be the most sustainable options available, within the context of the overall high levels of population growth being proposed in the East of England Plan" (paragraph 5.17).</p> <p>The importance of ensuring infrastructure is provided alongside development is recognised in the Core Strategy, and extensions to the residential envelope will be phased as set out in policy H2 and H3. Appendix H1 identifies infrastructure requirements for each general location. The issue of highways is addressed within policy T1 and T2, and public transport is addressed in policy T3. Appendix CLT1 identifies funding for both highways and public infrastructure improvements.</p>
<p>It needs to be demonstrated that the areas of Green Belt land to be lost are justified and located in the most appropriate area and that areas of release land do not undermine the principle of the Green Belt.</p> <p>It is understood from Paragraph 6.7 of the Submission Core Strategy that the Council will seek to examine the degree to which current Green Belt land is helping to achieve the purposes of the Green Belt when considering reallocating land. However, areas of Green Belt are proposed to be reallocated for urban extensions prior to this research being undertaken. The reallocation of certain areas of Green Belt is not based on a credible evidence base.</p>	<p>The Core Strategy, as a strategic document has identified the general locations proposed for Green Belt release, which as identified in the Sustainability Appraisal, are the most sustainable locations. The specific sites to be reallocated will be subject to appraisal in the Allocations Development Plan Document.</p>
<p>There is no statement within PPS7 that retail or residential developments are</p>	<p>The need to support the rural economy must be balanced against the</p>

Issue raised	Initial Officer Comments
<p>unacceptable forms of development in the countryside. Paragraph 17 of PPS7 states that "re-use for economic development purposes will usually be preferable, but residential conversions may be more appropriate in some locations and for some buildings". It is therefore inconsistent to prevent retail and residential development as acceptable forms of farm diversification. This restriction is over bearing and unnecessary in relation to re-use of buildings and rural diversification.</p>	<p>requirement to protect the character and openness of the District's Green Belt as set out in PPG2, as well as other sustainability issues.</p> <p>PPS3 states that residential development should be located in the most sustainable locations and it is not considered to be a sustainable approach to scatter development throughout the Green Belt. There is already concern of the impact of proposed development in the general locations raised by the Highways Authority, which as identified in the Sustainability Appraisal are the most sustainable locations. Given the majority of the Green Belt is situated to the east of the District which is the least accessible, sporadic development may have a detrimental impact. Furthermore PPS6 states that development should be directed towards the town centres.</p>
<p>Where Green Belt is reallocated this should be the minimum necessary.</p>	<p>Comment is noted. The Core Strategy accords with this view.</p>
<p>A review of the Green Belt boundary should be undertaken. Minor adjustments could be made to the Green Belt boundary in order to accommodate some of the District's housing requirement.</p>	<p>The Allocations Development Plan document will determine revisions to the Green Belt boundary.</p> <p>The delivery of the District's housing requirements through a multitude of minor alterations to the Green Belt boundary would not ensure the delivery of dwellings in a sustainable matter, and would not enable the delivery of a balanced strategy to housing distribution as set out in the Core Strategy.</p>
<p>Upper Roach Valley and Wallasea Island</p>	
<p>Repeating national/ local policies. There is also concern about the deliverability of policy URV1.</p>	<p>Policy URV 1 is spatially specific. It goes beyond national policies to identifying area for recreation.</p>
<p>The proximity between residential development and the country park contradicts the concept of the country park.</p>	<p>The proposed green lung in Policy URV1 would not be affected by proposed residential development as set out in policy H2. It is preferable to have easy access to open spaces in a close</p>

Issue raised	Initial Officer Comments
	proximity to residential settlements.
Baltic Wharf should be addressed in policy URV2.	This policy looks at recreation opportunity in Wallasea Island. The long term future of Baltic Wharf is addressed by other policies in the Core Strategy.
Concern was expressed that the infrastructure may not be able to cope with the proposals for Wallasea Island.	The Council will work with the RSPB and other key stakeholders (i.e. Highways Authority) to ensure the Wallasea Island Wild Coast project is delivered and the site is accessible as stated in the Implementation, Delivery and Monitoring chapter.
Environmental Issues	
Objection to not having the HRA in place as part of the evidence base.	The HRA was prepared alongside the pre-submission Core Strategy and will be submitted to the Secretary of State together with the Core Strategy as required.
Vision does not correspond with PPS25.	The Council believe that the vision is in accordance with PPS25.
The text is not clear.	The Council believe that the text in the Core Strategy is clear.
Concern was expressed that insufficient attention has been paid to flood mitigation measures.	Flood mitigation is addressed in strategic terms in the Core Strategy. The Shoreline Management Plan will provide further policies. Detailed flood mitigation measures where required will be dealt with at project level.
Go East support Para 8.3	Comment noted.
Archaeological heritage of Canewdon has not been included.	Paragraph 8.15 only gives some examples of sites which are of historical and archaeological interest, not all of them.
The deliverability of Policy ENV1 is in doubt.	Delivery is set out in the Implementation, Delivery and Monitoring chapter.
Support Policy ENV1.	Comment noted.
It is not clear that how the Council is going to implement policies in Policy ENV2 i.e. prevent the potential for coastal flooding.	The Council is working closely with the Environment Agency to produce a Shoreline Management Plan. Further details will be addressed at a project

Issue raised	Initial Officer Comments
	level.
More Green Belt should be released to accommodate new housing if land in Flood Zone 3 fails to pass the exceptions test.	Comment noted. There is only 1 site proposed in the Core Strategy that is within Flood Zone 3, of which the SHLAA notes that the quantum is deliverable. Policies H1, H2 and H3 are flexible to allow for changing circumstances.
This policy is unsound due to one of the areas (Land north of London Road) proposed is within Flood Zone 3, thus it will increase the risk of flooding.	Specific site locations will be determined in the Allocation Development Plan Document.
Policy ENV3 is reformulating national policy therefore is not required.	The Core Strategy goes further than the PPS by addressing the particularly local circumstances that will impact on the application of the sequential test.
Policy ENV3 does not conform to PPS25 - Previously developed land within Flood Zone 3 should not be considered ahead of greenfield land that has a lower flood risk.	PPS25 advocates the application of a sequential test to direct development to areas less at risk of flooding where possible and appropriate. The Core Strategy is consistent with this approach.
	The Council will monitor the proportion of applications in which SUDs are incorporated as stated in the Implementation, Delivery and Monitoring chapter. In addition, the Environment Agency's advice will be sought.
The latest SFRA is not PPS25 compliant.	The SFRA is being updated. The Core Strategy does not propose any development outside of Flood Zone 1, with the exception of Stambridge Mills. This issue is addressed in detail in Topic Paper 1.
Policy on SUDs is unsound in its present form and should be made far more robust in conjunction with Policy ENV3.	The Council consider that Policy ENV4 is robust and provides sufficient detail.
How do we ensure that future developments will meet the SUDS standards?	This issue is addressed through the Deliver, Monitoring and Implementation section of the Core Strategy.
Some areas may not be able to manage vast amounts of extra water resulting in more frequent flooding.	SUDS will reduce the likelihood of flooding.

Issue raised	Initial Officer Comments
Support policy ENV4.	Comment noted.
Policy ENV5 is unnecessarily restrictive.	The Council believe that the policy to restrict residential development in areas designated as Air Quality Management Areas due to their poor air quality is appropriate.
It is important for Hockley to remain pollution free.	Comment noted.
Definition of adverse visual impacts is unclear.	The policy forms part of the Core Strategy, and as such it is intended to be strategic rather than prescriptive. A case by case approach will be used to implementing this policy through the development management process.
Policy ENV6 is too weak, as it does not include the impact on the countryside.	This issue is expressed in the policy. The second bullet point of Policy ENV6 refers to "no significant adverse visual impacts", which applies to all areas, not merely for protected sites.
Concern was expressed that renewable energy projects need to be viable.	The policy forms part of the Core Strategy, and as such it is intended to be strategic rather than prescriptive. A case by case approach will be used to implementing this policy through the development management process.
Support Policy ENV7.	Comment noted.
Concern was expressed that renewable energy projects need to be viable.	The Core Strategy explains why biomass heating is not supported in paragraph 8.32. A case by case approach will be used to implement this policy through the development management process.
Future developments should be designated to include small scale renewable energy projects.	Comment noted.
Concern was expressed that renewable energy projects need to be viable.	The policy forms part of the Core Strategy, and as such it is intended to be strategic rather than prescriptive. A case by case approach will be used to implementing this policy through the development management process.
Support Policy ENV8.	Comment noted.
Support Policy ENV9.	Comment noted.
Concern was expressed that there is not enough evidence to show why the Council has to go above and beyond the	The evidence base such as the Water Cycle Study scoping report and SEA baseline show that water supply is an

Issue raised	Initial Officer Comments
policy targets for the Code for Sustainable Homes. The policy is out of step with government advice.	issue for the District. It is important to have a policy to regulate energy use and water efficiency in particular.
Concern was expressed that wording stating that the Code for Sustainable Homes requirements are subject to review should be included in the policy. Alternatively, no minimum target should be set within the Core Strategy.	The policy forms part of the Core Strategy, and as such it is intended to be strategic rather than prescriptive. The policy as stated allows for exceptions to the requirements to be made where these would render developments economically unviable.
Community Infrastructure, Leisure and Tourism	
GO East support policy CLT1, but state that brevity would assist clarity: explanatory text need not be a component of the policy itself.	Comment noted.
It is unclear how standard charges will be viable.	The Core Strategy is a strategic document and does not specify detailed costs. This will be addressed in detail through a separate Planning Obligations and Standard Charge document.
Infrastructure cannot be delivered through standard charges alone.	Standard charges will be used to aid the delivery of infrastructure.
Section 106 contributions need to be more transparent.	The provision of contributions will be monitored.
Lack of justification for infrastructure requirements in CLT1.	The infrastructure requirements have been developed in conjunction with service providers and having regard to the evidence base.
Circular 5/05 and the emerging/published DCLG guidance on the use of CIL, makes it clear that new developments/contributions from new development can not be used to resolve existing deficiencies, only, proportionally, those deficiencies made worse by the impact of new development. This should be made clear in the supporting text for this Policy.	Comment noted.
It should be made clear whether the Planning Obligations and Standard Charges Document will be a DPD or SPD. It is important that such a	The exact nature of the document will be dependent on the publication of detailed guidance by DCLG.

Issue raised	Initial Officer Comments
document is justified, subject to consultation, and tested by examination.	
Environment Agency support the inclusion of Sustainable Drainage Systems and flood protection measures in CLT1.	Comment noted.
Concerns expressed as to the impact of new development on the capacity of schools.	In conjunction with Essex County Council School Organisation and Planning, the Council have identified where issues will occur and the Core Strategy addresses these.
There has recently been a relocation of a primary school onto the park site with provision for expansion. Essex County Council predict a surplus of primary school provision in Rayleigh even after the predicted population increase .This suggests that provision will be in the wrong place and that an existing school in the east may well be closed. This is a waste of resources better to relocate some of the housing in the east.	The proposed policies in relation to education in the Core Strategy have been developed in conjunction with Essex County Council School Organisation and Planning, and having regard to the evidence base.
The evidence for the need for additional educational facilities is unclear.	The proposed policies in relation to education in the Core Strategy have been developed in conjunction with Essex County Council School Organisation and Planning, and having regard to the evidence base. The Essex School Organisation Plan is particularly relevant.
Essex County Council would wish to work with the District Council to ensure that future community infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.	Comment noted

Issue raised	Initial Officer Comments
<p>Essex County Council note that its services are not highly visible despite being regarded as highly desirable community services by local residents. The need to ensure adequate funding and contributions to enable these services to meet community expectations should be recognised and acknowledged in consideration of planning obligations and standard charges.</p>	<p>Comment noted</p>
<p>The Adult Community Learning Centre at Rocheway, Rochford could be better located with regard to the wider Rochford/Castle Point area of service. Relocation of the Centre could provide opportunities both at the new location and for the current site.</p>	<p>Comment noted.</p>
<p>In order to facilitate the addition residential units proposed for Ashingdon, it is important that King Edmund School can be expanded in order to accommodate the additional children generated by the new housing.</p>	<p>Comment noted.</p>
<p>It is unclear what the detailed requirements of Health Impact Assessment would be. Assessments should be carried out by a professional body.</p>	<p>The Core Strategy is a strategic document. The detailed contents of individual health impact assessments will be dependent on the nature of the specific projects to which they relate.</p>
<p>The requirement for Health Impact Assessments is overly onerous on certain forms of development, such as retail.</p>	<p>The detailed contents of individual health impact assessments will be dependent on the nature of the specific projects to which they relate.</p>
<p>Concern that there are insufficient health services to address residential development proposed.</p>	<p>The Core Strategy addresses this issue.</p>
<p>The retention of existing areas of open space remains of significant importance for existing and future residents. Residential development should not only ensure that it does not remove existing open spaces, but makes provision compatible with the scale of development proposed.</p>	<p>Comment noted</p>
<p>Policy CLT5 needs to be more specific and robust in forming a barrier between</p>	<p>The Council believe that the Core Strategy is sufficiently clear on this</p>

Issue raised	Initial Officer Comments
any possible new development and the A1245 road preventing any further westward sprawl and coalescence of Rayleigh and Rawreth.	issue, particularly where it is articulated in Appendix H1.
An up to date PPG17 compliant assessment of open space is important.	Comment noted. The Core Strategy is accompanied by such an assessment.
Theatres Trust state that there is a lack of cultural facilities in the District, that Rayleigh is the most likely locations for such facilities, and that, whilst the Core Strategy does contain a policy that states that additional evening uses will be developed in Rayleigh, there should be less reliance on Area Action Plans to deliver this. The Core Strategy lacks detail.	The precise range of uses that will comprise the evening uses in Rayleigh Town Centre is not considered to be a strategic issue that is required to be addressed in the Core Strategy. It is an issue that should be determined through the Rayleigh Town Centre Area Action Plan.
Employment, tourism etc development also generates open space/leisure needs and PPG17 requires the needs of those working in and visiting areas to be included in assessments and planning permissions do not only apply to housing. This could result in new non-residential developments not making any provision for additional needs that they generate.	PPG17 states that the needs of those working and visiting in areas are to be included in assessments of open space and leisure needs, but does not state that development which generates employment or visitors must contribute financially to leisure development. As such the approach in CLT1 is not inconsistent with national policy. The District has significant outcommuting, with most of the demand for leisure facilities in the District generated by residential development. In addition, the Council wishes to encourage new employment into the District and is mindful of excessive planning obligations deterring inward investment.
The Rochford Retail and Leisure Study is not considered to accord with guidance in PPG17 with respect to leisure/sports facilities as lack of detailed quantitative audits/assessments of all facilities in district as advocated in PPG17 guidance and assessment dependent on general household survey results rather than local consultation and use of strategic sports/leisure planning tools. Without such evidence base, difficult to justify protection of existing facilities, provision of new facilities and developer contributions.	Evidence on the provision of leisure facilities is contained within the SEA Baseline Report, the Retail and Leisure Study, Strategic Environmental Assessment Baseline Information Profile, Open Space Study and Annual Monitoring Reports
Rochford District Chamber of Trade and Commerce support Policy CLT8 and	Comment noted.

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<p>state that it is important to ensure that proper consultation is carried out with young people; not by those who think they know what young people want. Once projects are identified, they must be acted upon quickly with prompt implementation. Trends are apt to change before new facilities are introduced.</p>	
<p>CLT9 should include reference to a new swimming pool at Rayleigh Leisure Centre</p>	<p>PPS12 requires Core Strategies to be deliverable. Given the high cost of swimming pool provision, the deliverability of a swimming pool at Rayleigh Leisure Centre is questionable. The AMR shows that, based on Sport England's Sports Facility Calculator, there is an adequate supply of swimming pools in the District.</p>
<p>Sport England partially support Policy CLT9 but express concern that no guidance is provided on the criteria for assessing proposals involving new leisure facilities or development affecting existing facilities, and therefore the policy would be difficult to use in development control.</p>	<p>The policy forms part of the Core Strategy, and as such intended to be strategic rather than prescriptive. Comments from Sport England are more relevant to a Development Management DPD or SPD.</p>
<p>Policy CLT10 makes reference to it being acceptable for playing fields to be developed if it can be demonstrated that the site is not viable for use as playing pitch. However this is ambiguous as unclear what is meant by viable for use and does not accord with PPG17 (para 15) on development affecting playing fields which does not include any criteria relating to viability. This has potential to be misinterpreted by developers e.g. any former playing field could be claimed to be unviable.</p>	<p>The policy forms part of the Core Strategy, and as such intended to be strategic rather than prescriptive. This policy acknowledges that in certain circumstances, playing pitches may cease to become viable and that it would constitute an inefficient use of land for the Local Planning Authority to refuse any alternative use of such land even in the event that it was clear that such land could never be used as a playing pitch. Sport England's suggestion that the Local Planning Authority remove references to the loss of existing playing pitches being resisted would only encourage the loss of playing pitches and is not considered appropriate.</p>
<p>Paragraph 1.6 of PPG2 advises that providing opportunities for outdoor sport is one of the objectives of use of land in</p>	<p>Policy CLT10 is consistent with PPG2. PPG2 states that outdoor recreation is an appropriate use within the Green</p>

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the Green Belt. Consequently, no requirement to demonstrate a need for additional playing pitches as it is not inappropriate development in Green Belt.	Belt, but also states that the most important aspect of Green Belt is its openness. As such, it is appropriate for the Local Authority not to allow an over proliferation of playing pitches in the Green Belt (along with associated ancillary facilities) which would undermine the openness of the Green Belt, as well as reducing Green Belt land available for other forms of outdoor recreation or agricultural activity.
GO East state it would aid clarity to explain that the Council expects to adopt its Playing Pitches SPD in January 2010	The Playing Pitch SPD is scheduled for adoption in the revised LDS in September 2010.
Rochford District Chamber of Trade and Commerce support policy CLT11 and state that more bed and breakfast accommodation is required in the District.	Comment noted.
GO East support Appendix CLT1 and state it identifies infrastructure that may form the basis of applying standard charges or negotiating planning obligations with developers.	Comment noted.
Essex County Council state that Appendix CLT1 to, for early years and childcare facilities, under 'other issues / comments', 'Land to be allocated within new residential areas, should be added.	Comment noted,
Standard charges and planning obligations cannot be used to provide on-going services, such as bus services.	Standard charges and planning obligations can be used for initial support ("pump priming") of providing services.
Transport	
The development of a Transport Strategy SPD must be subject to meaningful consultation with stakeholders. It is vitally important for the efficient movement of goods and services that significant improvements to the existing highway infrastructure will be required during the plan period. The existing levels of congestion are considered to be unacceptable, so further provision is essential to cope with the traffic	Details of specific highway improvements will be set out within the Transport Strategy SPD which will be developed with partners and will undergo full consultation with stakeholders. East and West connections have been highlighted as a priority for improvement within the Core Strategy. The Core Strategy also recognises congestion and highway improvements as an issue and seeks to

Issue raised	Initial Officer Comments
generation to be created by more housing and employment. Consideration must also be given to a better east-west route linking east Rochford to the A130/A127.	address them through the document.
Would it be possible to achieve this vision within 5 years?	The Council's view is that the Local Development Framework will enable the delivery of the vision.
Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths". The Core Strategy also contravenes its own policy T1 and is unsound.	The Council's main approach to new employment development is to focus this in town centres, which are by their own nature very accessible. The Council propose 3 new employment areas: West Rayleigh which is accessible by the A1245, A130 and A127, North of London Southend Airport which is accessible by train, bus, and car, and has also been noted as a regional priority for transport improvements. This is stated within the London Southend Airport and Environs Joint Area Action Plan and further details will be delivered at project stage. The site is also a proposed location for the South Essex Rapid Transit bus network. South of Great Wakering is the third location, which is accessible by car and by bus.
Development in Rawreth will not reduce the reliance on cars, because it is too remote from principal towns and schools. Not mentioned in T2, Rawreth Lane forms part of the East to West network. Presumably this means no delivery of online improvements.	Online improvements will be required from the developer of site "North of London Road". The site is located on the border of the settlement of Rayleigh and thus is not remote from the town. A new primary school is required at the site. Notwithstanding this, online improvements and funding for them will be required from developers, particularly in relation to priority areas, which the Core Strategy recognises as east - west highways. Specific improvements will be looked at further in the Transportation Strategy SPD, and at a project level. The list of areas we seek to improve within the Core Strategy is, as stated, by no means exhaustive, and is at a strategic level.
Quote from above: "In addition, the	Whilst the east of the District supports

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<p>Council believe that existing connections between the west, where the population is focused, and the more rural east which nevertheless contains a number of local employment uses, is inadequate. The Council will work with Essex County Council to seek necessary improvements to east-west highways in order to help sustain employment uses in the east of the District". Yet more evidence that the extra dwellings in the west will affect existing connections with the east. Again I state that far less dwellings should be proposed for Rawreth.</p>	<p>several important local employment areas which would benefit from east - west highway improvements, the vast amount of commuting from the District is to Chelmsford, Basildon or Southend. The evidence base makes clear that there are far greater constraints to the east, and that the services and infrastructure are concentrated in the west development there more sustainable. The highways infrastructure is superior in the west of the District.</p>
<p>Note that the Core Strategy makes special reference to the Rayleigh Weir junction, where the present roundabout structure over the A127 is unable to cope with dispersing the large volume of traffic efficiently at peak periods which, particularly in the evening, result in considerable tailbacks from Rayleigh Weir, along the A127 towards Basildon, creating congestion on the roundabout under the A127 where the A130 feeds in.</p>	<p>Comment noted.</p>
<p>The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved. Thus the proposals are not founded on a robust and credible evidence base and are unsound.</p>	<p>The Area Action Plans will determine the development, quantum of development and the highway infrastructure to be provided. Strategic improvements have been identified within the Core Strategy. No objection has been received from Essex County Council Highways.</p>
<p>RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to</p>	<p>The Core Strategy is a balanced strategy that seeks to ensure housing delivery for communities on larger sites where highway infrastructure can be accommodated. ECC have been consulted on the Core Strategy Submission Document and have stated</p>

Issue raised	Initial Officer Comments
<p>determine the impacts. It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.</p>	<p>that the highways have capacity to support the extra traffic generated from additional housing, however mitigation measures will be required at junctions. Highways issues concerned with Eldon Way/Foundry Industrial Estates will be addressed through the HAAP.</p>
<p>I fully support the wording of this policy but would like to comment that the housing policies in the Core Strategy are in direct conflict with it as they propose to locate dwellings where there are very poor public transport links. As a result, this will mean reliance on the private car.</p>	<p>New public transport will be required which is recognised within the Core Strategy. It is unrealistic to expect public transport to be available in a place where no development currently exists.</p>
<p>Support Policy T1 but would expect consideration to be given to enhancing the highway network at a strategic level i.e. new east-west route linking east Rochford to A130/A127, as well as delivering online improvements to east-west network.</p>	<p>East - west highway improvements are recognised within the Core Strategy. A new road is considered to be unnecessary and there is no evidence to suggest that a new road would be viable or deliverable.</p>
<p>It is unclear what is meant by "online improvements"</p>	<p>Online improvements are improvements to the existing highways network.</p>
<p>Are the hopes outlined here realistic? It is a lost cause to try to cut down the use of the private car. Section 106 Agreements would appear unlikely to cover the cost of adequate improvements. If this is not carried out, we will have serious problems with the increase in development planned.</p>	<p>Essex County Council Highways have been consulted and state that the requirements are viable and deliverable.</p>
<p>7000 new jobs at Southend Airport and more than 50% of the houses in the west of the district. Probably little walking or cycling to work. Poor public transport and an inadequate east/west route. Workers houses should be within a 2 mile radius of airport, to north or north east.</p>	<p>Not all new employment is based at London Southend Airport. Other issues concerning housing need to be taken into account in particular the need to provide housing in different communities.</p>
<p>Policy T1 whilst generally supporting this it is felt that safeguards need to be built in to this policy to ensure that S106 finance</p>	<p>Comment noted. The Core Strategy states that this will be the case.</p>

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is actually used for the infrastructure improvements for which it is intended, particularly in the light of recent revelations of the loss of such monies.	
The policy stated here is not the same as published in the PDF version or made available through the local library. The PDF version includes improvements Spa Road/Main Road roundabout. There may be other variances between documents. It is important to be clear what the policies are that are being proposed.	The online version was corrected, and the two respondents who may have commented prior to this correction were contacted and alerted and asked if they would like to make additional representation.
PPS12, para 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable	Essex County Council have confirmed that the scale of highway improvements required is relatively modest and viable. Indicative costs are set out in a separate supporting document.
Support Policy T2 and, recognising that the list is not exhaustive, would consider it essential that improvements to Sutton Road and access to the Purdey's Industrial Estate are a very high priority.	The Core Strategy outlines highway improvements with strategic impacts. Additional improvements may be identified and addressed through the Transportation Strategy SPD.
During LDF consultations residents were invited to submit suggestions on any matters. I submitted a suggestion to extend Cherry Orchard Way northward. Connected to 3 East/West routes it would reduce congestion through surrounding towns. This was dismissed without even a thank you. Wish to participate during oral part of the examination.	Suggestions and comments from the public during the consultation process have shaped the document to its present form. The Council have considered highway implications with Essex County Council Highways and will consider them in further detail within the Transportation Strategy SPD.
There is reference to The Spa/Main Road, Ashingdon/Rectory Road junctions, and enhancement of the B1013 as possible traffic improvements (which will be needed if the developments in Hockley and Hawkwell go ahead), but no	The Core Strategy is a strategic document which has been developed in consultation with the Highways Authority. A Transport Strategy SPD will be produced detailing the transport strategy and requirements for the District

Issue raised	Initial Officer Comments
<p>specific explanation how these will be implemented. Installing traffic lights will not help to cut down tailbacks in rush hour, as shown by those on the Plumberow Ave/Greensward Lane junction.</p>	<p>in detail. The Transport Strategy SPD, or the AAP where relevant, will set out details as per the requirements and implementation.</p>
<p>The intention of the policy is clear however, in its current form, it could be argued that development that is not accessible by public transport must also not be accessible by private car.</p>	<p>The Council believe this policy is clear.</p>
<p>The concept is good but would not appear sustainable. Public transport providers will only operate where there is sufficient demand and revenue. The type of vehicles may change in the future - they may become more "green". Therefore more emphasis should be put on the private car making shorter and less journeys. More adequate parking etc. Attention should be paid to a system of integrated interchange of transport - cars/trains/buses/planes.</p>	<p>The Core Strategy addresses these issues. Whilst the Core Strategy seeks highway improvements due to increased car usage, it is unsustainable to promote increased use of the private car, and would contravene national guidance.</p>
<p>Encouraging alternatives to the use of the private car must not be used as an excuse by developers to lower standards of parking and vehicle storage. This policy is considered to be unsound unless it includes a statement to this effect and is made more prescriptive.</p>	<p>Parking standards will be put into place when the Core Strategy is adopted.</p>
<p>The scale of any public transport initiatives or requirements (or contributions towards such initiatives) should of course reasonably relate to the impact of the development of the land. Circular 5/05 and the emerging/published DCLG guidance on the use of CIL, makes it clear that new developments/contributions from new development can not be used to resolve existing deficiencies (only, proportionally, those deficiencies made worse by new development).</p>	<p>Comment noted. This will be addressed through the Standard Charges document.</p>
<p>SERT is put forward as a solution to</p>	<p>SERT has the potential to access the</p>

Issue raised	Initial Officer Comments
reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not a realistic or reliable solution and the proposal is therefore unsound.	District in the future and is currently planned to serve London Southend Airport. SERT is not an RDC initiative but is however supported by the Council and therefore should be included within the Core Strategy.
Travel Plans are an unnecessary piece of bureaucracy. Who will produce (and pay for) them - the developer, the prospective owner? AT what stage will they be developed? Will they be maintained as circumstances change? Who will monitor their effectiveness?	Travel plans are considered to be an important part of the transport strategy for the District, and details of these will be set out at the application stage. The Annual Monitoring Report will monitor the effectiveness of the Travel Plans, in particular relating to National Indicator NI176.
when making these consideration, would you please also remember the people who use mobility scooters, the new development on the old hospital grounds, from the new library to the main road, can be difficult to use, as only one side has pavement and dropped curb.	Comment noted. This will be addressed at a project level.
The residents of Hockley have already requested the provision of cycle lanes and appropriate access points - Hockley to Rayleigh and Hockley to Rochford and to all schools in Hockley. The response is that there is no space for continuous stretches. Space will not magically appear so it is not possible for this part of the Core Strategy to be implemented.	Risk and safety are recognised and as such the Council will work with Essex County Council and Sustrans to provide safe usable cycle routes, including the strategic route planned by Essex County Council and supported by Sustrans.
More thought needs to be put to provision of cycling and walking .For example it states that watery lane and beeches road are to be improved to take extra traffic from Hullbridge this will be in direct conflict with the stated intention to direct cyclists down these roads on a Sustrans network .It is already too dangerous to cycle safely down there .There is also conflict with pedestrians as there is no path or refuge leading from a footpath from Hullbridge to Battlesbridge until the seawall is open for access under new legislation.	Highway improvements can entail anything from resurfacing, additional pavements, additional cycle routes, bollards, safety barriers, and are not mutually exclusive to the actual road. Safety issues will be addressed at a project level and highway improvements will be aimed at all users.
Ensure conformity with the East of	Comment noted. The Council believe

Issue raised	Initial Officer Comments
England Plan (Policy T14 and para 7.37)	that the policies within the Core Strategy are in accordance with the East of England Plan.
Another important factor not addressed in this document is commuter parking near railway stations. This totally overburdens streets up to a mile from the station and must be controlled. Commuter parking should be banned, usually by banning parking at certain hours such as 10 to 11 am which makes it impossible for commuters. It would be necessary to provide better public transport from areas such as Ashingdon which do not have a railway connection. In many cases the regulations are there but not regularly enforced.	Comment noted, although this is not a strategic issue.
The policy should also cover the subject of parents parking outside schools to collect their children. This parking is notoriously anti-social, on pavements, across drives, on verges etc. It can and often does obstruct the pavements making it difficult for prams and motorised scooters to pass. It also obstructs the road making it difficult for the emergency services to pass. The regulations should be clear and always carried out by the authorities.	Comment noted, although this is not a strategic issue.
Policy T8 confirms that the Council will apply minimum parking standards. As set out in the representations to the Preferred Options Core Strategy, the guidance in Planning Policy Guidance Note 13: Transport (PPG13) is clear regarding the imposition of parking standards. Paragraphs 52-56 of PPG13 confirm that the Local Planning Authorities should apply maximum not minimum parking standards. In order to satisfy the legal requirements set out in PPS12, the policy must reflect PPG13 to promote sustainable transport choices and further provide incentives for developers to locate further residential land closer to local service centres by requiring maximum parking standards for	PPS3 acknowledges the need for parking standards to be set at a local level. The ECC Parking Standards proposes minimum parking standards for trip origins. The Essex County Council Parking Standards have been produced with the Essex Planning Officers Association and are based on extensive evidence at a local level, and account for local circumstances.

Issue raised	Initial Officer Comments
residential developments.	
Economic Development	
Baltic Wharf is an important employment area.	Comment is noted.
The voluntary sector needs a coordinated approach to needs and recruitment. This is currently disjointed.	Comment is noted.
Tourism is supported.	Comment is noted.
The development of a skills training academy needs to be given high priority.	Comment is noted.
The Core Strategy should not refer to the development of the airport.	The Council supports the enhancement of the airport, which is recognised within the East of England Plan 2008 as being an important sub-regional economic catalyst. Therefore reference to the airport in the Core Strategy is appropriate.
Policy ED1 is not justified. The sixth bullet point should be redrafted to include the words "London Southend Airport and its Environs".	The policy is justified as the airport is recognised within the East of England Plan as being an important sub-regional economic catalyst.
The general locations for employment are not appropriate due to poor public transport links, increased reliance on the car and increased emissions. The Core Strategy proposes to move employment out of accessible locations contrary to government policy specifically PPS1 and PPG4.	The identified general locations for employment land are strategic locations. The general location of west Rayleigh has good access to the A127 and the A130, with a good relationship to the residential area and has been identified in the Employment Land Study 2008 as the most appropriate location to accommodate displaced and additional employment land to the west of the District. The area to the north of the airport will benefit from being in proximity to the airport and will be identified through the Joint Area Action Plan (JAAP) with Southend Borough Council. The general location to the south of Great Wakering will provide a small site to provide local employment. With regard to public transport the Core Strategy proposes new and improved public transport links especially around

Issue raised	Initial Officer Comments
	the airport, which would be rendered viable by the clustering of employment land uses at this location. There will be some loss of industrial land within settlements, however, a range of employment uses may be proposed as set out in policy RTC6 for example which will be delivered through the Area Action Plans.
The Council should not assume that the expansion of the airport will go ahead.	The Core Strategy does not assume this. The Council supports the enhancement of the airport, which is recognised within the East of England Plan 2008 as being an important sub-regional economic catalyst. Therefore reference to the airport in the Core Strategy is appropriate. The Council also does not seek to overly rely on the airport as an employment generator and as such supports the development of both aviation and non-aviation related employment opportunities which would benefit from an airport location.
The title of policy of ED2 should be amended to read "London Southend Airport and its Environs".	Comment is noted.
Over concentration of employment at one site is inappropriate. Employment land should be dispersed.	The Council supports a range of employment uses across the District, however, recognises that businesses can benefit from being in proximity to key economic drivers such as London Southend Airport.
Stambridge Mills Industrial site will be unsustainable for housing due to flood risk and the potential mitigation costs and therefore should be retained for light industrial use. Alternative site for housing needs to be allocated.	Stambridge Mills is currently a vacant employment site with poor building quality as stated in the Employment Land Study 2008. Although it has been identified in this Study as appropriate for light industrial use, the sites owners have indicated that use for employment is highly unlikely to be viable. Representations received throughout the preparation of the Local Development Framework suggests the lack of willingness to develop Stambridge Mills for employment and, as such, such an approach is not deliverable. Furthermore the SHLAA (2009) suggests that this

Issue raised	Initial Officer Comments
	brownfield site is deliverable and can pass the exceptions tested provided that the necessary flood defences are in place.
Purdeys Industrial Estate should be expanded.	The Core Strategy identifies where the most appropriate locations for employment land are.
The Core Strategy predetermines the outcome of the Hockley Area Action Plan.	The Core Strategy provides a 'hook' for the Hockley Area Action Plan and sets the objectives for the plan but does not predetermine it. Furthermore with specific reference to the reallocation of employment land in Hockley, this objective was included in RTC5 at the Preferred Options stage of the Core Strategy.
Industrial areas should not be moved away from towns because of pressure to provide housing.	The reallocation of employment land is not due to pressure to provide housing but the strategic relocation of employment land. The Area Action Plans for Rochford, Rayleigh and Hockley centres will promote employment. The potential redevelopment of employment land in Hockley, for example, will not result in a lack of employment within the centre as such redevelopment will promote a range of employment uses more appropriate to the location.
The reallocation of employment land for housing is not deliverable and Green Belt should be released for housing.	These are not short term housing proposals, as noted in the SHLAA (2009) these are more long term. The Core Strategy promotes the efficient use of brownfield land in sustainable locations in accordance with PPS3.
The Core Strategy should have greater flexibility to ensure that there is a constant 5 year supply of housing if the employment sites identified do not come forward.	The delivery of housing will be flexible as stated in the Housing chapter, particularly policy H2 and H3.
To ensure housing is delivered the Green Belt sites identified for 2015 onwards should be brought forward to provide some certainty that national/regional	It is important to ensure that brownfield land is developed before greenfield land because it is recognised that brownfield land is more difficult and expensive to

Issue raised	Initial Officer Comments
housing targets and annual build rates/5 year land supply can be met/achieved.	develop and developers would thus, if left with the choice, be more likely to want to develop greenfield land over brownfield. The use of greenfield land first would therefore undermine the regeneration of brownfield land. The use of brownfield land before greenfield also enables the Council, in monitoring the district's housing land supply, to take into account windfall and thus effectively manage the release of Green Belt land to ensure that the minimum amount of land necessary is released. The SHLAA demonstrates that the approach in the Core Strategy will deliver an adequate housing supply.
With the proposed additional housing in Hockley and Hawkwell and potential expansion of the airport there is no provision for the improvement of the B1013 through Hockley.	The B1013 is identified as a highway in need of improvement in policy T2.
Employment land to the west of Rayleigh should be situated to the south of the railway line.	The exact location of employment land to the west of Rayleigh will be determined through the Allocations Development Plan Document.
Employment land to the west of Rayleigh should be identified to the north of London Road, not the south.	The south of London Road has better roads links and a better relationship with residential development compared to the north of London Road.
Existing employment land at Lubbards Lodge Farm (situated between Rayleigh and Hullbridge) should be allocated rather than Green Belt land to the west of Rayleigh.	The Employment Land Study 2008 identifies the west of Rayleigh as the most appropriate location to accommodate displaced businesses from other reallocated employment land. Lubbards Lodge Farm, whilst accommodating businesses is not in an appropriate, sustainable location to accommodate these additional businesses as it is situated between the settlements of Rayleigh and Hullbridge and its further expansion could lead to the coalescence of the two settlements, which the Council (as part of its balanced strategy) seeks to avoid. As stated in policy ED1, however, the Council supports existing small and

Issue raised	Initial Officer Comments
	medium sized businesses in the Green Belt.
The description for employment land to the south of London Road is too vague.	The Core Strategy sets out the general proposed locations for development, with more detailed site-specific policies set out in the emerging Allocations Development Plan Document.
If Green Belt is reallocated it should be for housing not employment for example in Great Wakering.	There is a need to allocate Green Belt for both employment and housing. The proposal to reallocate employment land to the southwest of Great Wakering is considered a sustainable and efficient use of land. It is recognised that employment land to the north of this site would need to be redeveloped in conjunction with the area to the south to ensure a sustainable and cohesive extension to the existing residential envelope.
The phasing of employment land could lead to the undersupply or oversupply of employment land in the District. It may also lead to the provision of unaffordable premises for displaced businesses.	The detailed phasing of employment land will be addressed through Allocations Development Plan Document. With regard to the issue of unaffordable premises the Council will establish an Eco-Enterprise Centre for new businesses and the Economic Development Strategy (2009) states that the Council will work with and support displaced businesses.
Should it be accepted that the existing employment sites are retained as such, then some or all of the future employment allocations will not be necessary.	If existing employment land remains as such the Council will still need to allocate an additional 2.2 hectares of employment land to meet the District's needs as identified in the Employment Land Study 2008. However, the Core Strategy is a long term strategic document which seeks to promote the efficient use of brownfield land in sustainable locations in accordance with PPS3 and reallocate existing "bad neighbour" employment land to more appropriate and sustainable locations.
The reallocation of employment land at Eldon Way and the Foundry Industrial	The Council set out its preferred approach to existing employment land in

Issue raised	Initial Officer Comments
Estate has not been adequately consulted on.	the District in ED3 of the Preferred Options which has been expanded upon in policy ED3 of the Submission Core Strategy. RTC6 of the Core Strategy Preferred Options identified the industrial uses in Hockley for redevelopment. Policy RTC5 of the Submission Core Strategy sets the objectives for the Hockley Area Action Plan, which follows on from the preferred options document.
The District is required to provide an additional 3000 jobs, but employment land at Eldon Way is to be reallocated for alternative uses. If these are to be accommodated elsewhere for example near the airport then new jobs will not be provided.	The proposed uses for Eldon Way will be determined through the Hockley Area Action Plan, but as set in the objectives of policy RTC6, this will be a mixed use development including a range of employment uses. These would be more appropriate to the sites location. As set out in policy ED4 additional employment land will be allocated.
The Core Strategy ignores the Hockley Parish Plan (2007).	The proposed housing figure for Hockley forms part of the Council's balanced strategy for housing allocation across the District. The Hockley Parish Plan 2007 states that "There is a unanimous desire for Hockley to remain as a distinct community with clear boundaries and green spaces between Hockley and its neighbouring parishes. Whilst aware of the Government proposal for 3700 additional dwellings in the Rochford district ..., many would prefer no further development but, if it cannot be avoided, it should be on existing occupied residential or industrial property sites." (Page 6). The Core Strategy accounts for the findings of the Hockley Parish Plan.
Economic growth around the airport is not deliverable.	Rochford and Southend Council's are working on a detailed Joint Area Action Plan for the airport and its environs which will detail how actions will be delivered.
There has been insufficient opportunity to comment on policies ED3 and ED4 which have changed considerably since the Preferred Options.	Production of the Core Strategy is an iterative process. There issues were raised in the general Core Strategy Preferred Options and the evidence

Issue raised	Initial Officer Comments
	base supports the detail in the Core Strategy Submission Document.
Retail and Town Centres	
Question the need for more shops in the District.	Evidence for the need for additional retail development is provided in the Retail and Leisure Study.
Support from Rochford District Chamber of Trade and Commerce for policy on village and neighbourhood.	Comment noted.
Theatres Trust state that there is a lack of cultural facilities in the District, that Rayleigh is the most likely locations for such facilities, and that, whilst the Core Strategy does contain a policy that states that additional evening uses will be developed in Rayleigh, there should be less reliance on Area Action Plans to deliver this. The Core Strategy lacks detail.	The precise range of uses that will comprise the evening uses in Rayleigh Town Centre is not considered to be a strategic issue that is required to be addressed in the Core Strategy. It is an issue that should be determined through the Rayleigh Town Centre Area Action Plan.
The Cultural Strategy states that there is no museum within the District or live music and performance open space.	<p>These are not considered to be strategic issues that are required to be addressed by the Core Strategy.</p> <p>In addition, it should be noted that since the publication of the Cultural Strategy, Rayleigh Windmill has been converted into a museum and awarded an Accreditation status in 2009.</p> <p>Furthermore, there are a number of venues within the District which host live music events at a small scale and it is not necessarily considered necessary to designate land specifically for this purpose.</p>
The contribution the County Library service could make to plans for the town centres should not be overlooked. The 5 libraries in the District are substantial footfall draws in their localities and act as a 'community anchor store'. This has knock-on effects in encouraging use of neighbouring retail and service facilities. Further the Library service is currently looking at co-location opportunities for other services within the libraries which	Comment noted.

Issue raised	Initial Officer Comments
would enable them to act as a community focus.	
The town centres of Rayleigh, Rochford and Hockley, and future plans for them, are closely linked to the economic development of the District but also present the opportunity to offer greater community focus within the District. Essex County Council support the varied approach being taken to each of these town centres is supported (Policy RTC4, RTC5 and RTC6), notably the recognition of the role and purpose of the town centres beyond retail uses.	Comment noted.
Proposals for Hockley town centre would result in congestion, loss of quality of life, increased pollution.	The Core Strategy sets out the objectives for the Hockley Area Action Plan for Hockley centre in Policy RTC6. The Sustainability Appraisal has found that the policy will deliver an array of social, economic and environmental benefits
Infrastructure improvements required to deliver development in Hockley town centre are not deliverable.	The detailed development proposals for Hockley centre will be determined through the Hockley Area Action Plan. The Core Strategy sets out the required strategic infrastructure improvements. The Hockley Area Action Plan will determine further details.
The Core Strategy pre-empt's community involvement in the Hockley Area Action Plan.	The Core Strategy sets objectives for the Hockley Area Action Plan, but it does not set detailed proposals for the area – these will be determined through the Hockley Area Action Plan.
<p>The Core Strategy misrepresents the findings of The Retail & Leisure Study (2008) and states "Hockley has great potential and has a need for additional convenience floorspace".</p> <p>Whereas, the R&LS actually states:</p> <p>1) "does not lend itself to a food store capable of retaining a significant proportion of main food shopping expenditure.</p> <p>2) "there is no immediate capacity for additional floor space."</p>	<p>The Retail and Leisure Study identifies numerous opportunities to enhance Hockley centre, such as those listed in Table 6.3 of the study.</p> <p>With regards to retail need, the Retail and Leisure Study (2008) states:</p> <p>"Hockley is identified as having a need for between 220 sq m and 650 sq m convenience floor space in 2008, with a long term requirement of between 300sq m and 890 sq m in 2026. However the scale of need does not lend itself to a</p>

Issue raised	Initial Officer Comments
<p>3) "recommend that focus be maintained on developing Hockley's existing strengths."</p> <p>4) " consider reclassifying Hockley from a town centre, to a district centre".</p> <p>5) "do not consider it to meet the definition of a 'town centre' as set out by PPS6"</p>	<p>foodstore capable of retaining a significant proportion of main food shopping expenditure." (para. 10.26).</p> <p>The Core Strategy does not propose a large foodstore for Hockley.</p> <p>The Core Strategy does not propose that future development in Hockley does not focus on maintaining its existing strengths.</p> <p>The Retail and Leisure Study states that, whilst the current nature of Hockley does not lend itself to classification as a town centre as defined by PPS6:</p> <p>"This is not to say that Hockley does not have the potential to be a 'town centre', although this would be subject to expansion of its existing retail offer and catchment to meet the definition set out in PPS6" (para. 10.31)</p> <p>As such, the Retail and Leisure Study support the production of an Area Action Plan which seeks, amongst other objectives, to deliver an enhanced retail offer for Hockley.</p>
<p>Hockley should be left unchanged.</p>	<p>The Retail and Leisure Study identifies opportunities to enhance the town centre.</p> <p>Pressure for development / change is inevitable and it is appropriate to have policies in place to ensure that such development is sustainable.</p>
<p>Hockley Parish Plan states that clearly states that residents are strongly against any large scale housing development in Hockley. The Core Strategy ignores the results of consultation on the Hockley Area Action Plan.</p>	<p>"There is a unanimous desire for Hockley to remain as a distinct community with clear boundaries and green spaces between Hockley and its neighbouring parishes. Whilst aware of the Government proposal for 3700 additional dwellings in the Rochford district ..., many would prefer no further development but, if it cannot be avoided, it should be on existing occupied residential or industrial property sites."</p>

Issue raised	Initial Officer Comments
	(Page 6, Hockley Parish Plan). The Core Strategy sets objectives for the Hockley Area Action Plan, but it does not set detailed proposals for the area – these will be determined through the Hockley Area Action Plan.
The Foundry Industrial Estate was not referred to in any previous plan.	The Core Strategy Revised Preferred Options (2008) referred to industrial uses within Hockley centre.
There are inconsistencies between the Hockley Area Action Plan and the Core Strategy.	The Hockley Area Action Plan has yet to be produced. It is at a very early stage in its production process.
Implementation, Delivery and Monitoring	
GO East support the Implementation, Delivery and Monitoring chapter and state that it identifies, clearly, a description of tasks, ownership, potential risk, mitigative action and monitoring measures.	Comment noted.
Essex County Council state that Further, the Building for Life Assessment methodology was devised to measure the overall design/layout quality of housing developments. It was not devised to measure compliance with Lifetime Homes, which is largely, but not exclusively, concerned with internal space standards and the provision of internal arrangements within dwellings to meet needs of all residents.	Comment noted.
Essex County State that the proposed indicator for CP1 should be replaced by the Core Indicator, Housing Quality - Building for Life Assessments, particularly as Government has endorsed these principles and is urging local authorities to use	Comment noted
Environment Agency state that the Core Strategy should make reference to updating the Strategic Flood Risk Assessment under the risk mitigation heading for ENV3.	Comment noted
It is not adequately explained how policies H1, ED2, ED3 and RTC6 will be delivered in respect to the redevelopment of Eldon Way.	The scale of any redevelopment of Eldon Way has yet to be determined. The Hockley Area Action Plan is the appropriate vehicle for this. The SHLAA identifies Eldon Way as having potential for residential development.

Issue raised	Initial Officer Comments
The Annual Monitoring Report will only provide information on what has happened after the event.	The Annual Monitoring Report will provide an annual update on the progress of the Core Strategy.

Appendix 4

**Representations on soundness
of Core Strategy submitted
during Pre-Submission
consultation and registered**

Core Strategy Submission Document

O - 15731 - 9844 - Introduction - i, ii, iii

15731 Object

CHAPTER 1 Introduction

Respondent: Mr J Wiseman [9844]
Unknown

Agent: N/A

Full Text:

i think this core strategy is unsound because

UNDER PPS 12 THE DEVELOPMENT IS NOT SUSTAINABLE (SEE PREVIOUS EMAILS I HAVE SENT)

TRANSPORT

THEIR IS INSUFFICIENT PUBLIC TRANSPORT AND NO VIABLE/REALISTIC PLANS TO INCREASE IT.

DISTANCE FROM RAIL LINKS/SHOPS LEADING TO :-

INCREASED CONGESTION

NO POSSIBILITY/PLANS TO IMPROVE HIGHWAYS (SEE BELOW)

THERE IS NO VIABLE TRAVEL PLAN (REQUIRED FOR THIS SIZE DEVELOPMENT 50+)

ENVIRONMENT

LOSS OF GREEN BELT + WILDLIFE

SEMI RURAL LOCATION

NOT IN KEEPING WITH LOCAL CHARACTER

NO SOCIAL ,ECONOMIC OR ENVIRONMENTAL BENEFITS TO RESIDENTS , ONLY TO LOCAL GOVT AND DEVELOPERS.THIS WILL ADVERSELY AFFECT ALL LOCAL RESIDENTS , RUIN OUR QUALITY OF LIFE SOLELY FOR DEVELOPERS TO MAKE MONEY AND THEN LEAVE.

PLEASE ACT ON THE BEHALF OF THE PEOPLE WHO ELECTED YOU AND RESPECT OUR WISHES.YOU DO NOT HAVE THE RIGHT TO OUR VOTE, I WILL, AND NO DOUBT OTHERS HOLD POLITICAL PARTIES TO ACCOUNT FOR THEIR ACTIONS AND VOTE FOR PARTIES THAT ACT FOR US NOT AGAINST US

APPARENTLY (YOUR) RDC PRINCIPLES WITHIN THE CORE STRATEGY STATES :

"SEEKS TO TAKE ADVANTAGE OF DEVELOPMENT OPPORTUNITIES THAT WILL PROVIDE SOCIAL ECONOMIC AND ENVIRONMENTAL BENEFITS"

"THERE IS A LIMIT TO HOW MUCH INFILLING AND INTENSIFICATION EXISTING SETTLEMENTS CAN SUSTAIN WITHOUT THIER CHARACTER BEING ADVERSELY AFFECTED"

"TO LOCATE DEVELOPEMENT IN AREAS WHERE ALTERNATIVES TO CAR USE ARE MORE VIABLE , REDUCE THE REQUIREMENT TO TRAVEL, MITIGATE THEIR IMPACT ON THE EXISTING NETWORK"

"PLANNING SHOULD BE WELL RELATED TO EXISTING PUBLIC TRANSPORT WHERE POSSIBLE"

I cannot see how anybody can argue the above development complies with your principles

Having read the core strategy for RDC and Hockley development plan etc their is 2 huge flaws in the strategy and that is sustainability and quality of life.

I do not see any serious plans to deal with the current volumes of traffic on the b1013 , Hall rd , Ashingdon Rd and the link via Cherry Orchard rd let alone to cope with any future developments.

Using the B1013 as an example during the "rush hour" between 7-9am and 4-6pm it is not usual to only average 5-10mph between Rayleigh and Hawkwell this rd carries thousands of cars per hour and is apparently the busiest B rd in the country yet more developments (housing, southend airport and Hockley village centre) are all planned with no increase in rd capacity.

THIS CAN ONLY INCREASE TRAFFIC, DECREASE TRAFFIC SPEEDS, INCREASE POLLUTION AND DECREASE THE QUALITY OF LIFE FOR ALL LOCAL INHABITANTS WITH NO DECERNIBLE BENEFITS FOR THE RESIDENTS

Core Strategy Submission Document

O - 15731 - 9844 - Introduction - i, ii, iii

15731 Object

CHAPTER 1 Introduction

There has been a distinct lack of investment in the local infrastructure by the local authorities over the last 20 yrs with more developments happening every yr.

Being a resident here for the last 20yrs + i remember the council promising that when Cherry Orchard Rd was developed that it would be extended all the past via Hullbridge to link to the now "old" a130 , instead either by design or accident there was never enough money to complete the project and thus the level of traffic increase by my estimate 3 fold as people used the b1013 as a "rat run" via Carpenters Arms etc to avoid congestion from the Rayleigh Weir onwards on the a127 to/from Southend.

I remember when there was no development along Cherry Orchard rd, now we have 2 car dealers and a petrol station this rd connects to Tescos ,Rbs call centre more car dealers etc and the a127 with plans for yet more factories the only thing that has not increased is the rd capacity.

With the plans for further housing in Hawkwell , more factories along Cherry Orchard RD etc as part of the Southend Airport plan ,air traffic and the redevelopment of Hockley village centre (more housing) i think that during rush hour the traffic will be grid locked in this area unless the council complete Cherry orchard rd to the old and new a130 and put in an effective by pass for Rayleigh , Hockley , Hawkwell and Ashingdon so that traffic for Southend etc doesnt have to go through these areas.

This could be done easily and with little disturbance to local residents by extending Cherry Orchard across onto Lower rd and then connecting Canewdon rd to Great Stambridge and onto North Shoebury.

Summary:

UNSOUND , UNSUSTAINABLE ,DESTRUCTION OF GREEN BELT,NOT IN KEEPING WITH LOCAL AREA, INCREASED TRAFFIC CONGESTION, INCREASED POLLUTION,LACK OF INVESTMENT IN INFRASTRUCTURE.NO SOCIAL OR ECONOMIC BENEFITS,LACK OF PUBLIC TRANSPORT NO POSITIVES ONLY NEGATIVES

Change to Plan

I THINK THERE NEEDS TO BE ONE DEVELOPMENT TO BE BUILT WHERE ALL NECESSARY RD LINKS /INFRASTRUCTURE CAN BE PUT IN PLACE INSTEAD OF OVERLOADING ALREADY OVERSTRETCHED RD LINKS.I KNOW THIS INVOLVES A LOT MORE WORK AND COST FOR THE RDC INSTEAD OF THE PIECEMEAL DEVELOPMENT WE CURRENTLY HAVE INFILLING SITES,WHICH IS ALSO THE CHEAP WAY OUT. BUT EVERYBODY KNOWS WE ARE CURRENTLY AT NEARLY MAXIMUM LOAD ON OUR RDS /LOCAL SERVICES IT MAKES NO SENSE TO KEEP ON ADDING TO THE PROBLEM SO SURELY IT IS BETTER TO HAVE A LONG TERM VIABLE PLAN TO BUILD A DEVELOPMENT/VILLAGE THAT IS SUSTAINABLE

Appear at exam? No

Soundness Tests i, ii, iii

Core Strategy Submission Document

15858 Object

CHAPTER 1 Introduction

Respondent: Mr Paul Sealey [12083]

Kirrin,
Hockley Rise,
Hockley
SS5 4PT
United Kingdom
01702206888

Agent: N/A

Full Text: It is not possible to determine if the Strategy is deliverable as there are no costs included, even indicative. There is no recognition of the current economic climate and the downward pressure on public expenditure that will affect the plan over the coming years. There is no indication that any of the other organisations have committed to their part in delivery of the strategy.

Summary: It is not possible to determine if the Strategy is deliverable as there are no costs included, even indicative. There is no recognition of the current economic climate and the downward pressure on public expenditure that will affect the plan over the coming years. There is no indication that any of the other organisations have committed to their part in delivery of the strategy.

Change to Plan There should be at least indicative costs for delivery of the strategy and undertakings from other organisations that they will deliver their parts.

Appear at exam? No

Soundness Tests ii

Core Strategy Submission Document

O - 15926 - 9905 - Introduction - i, ii, iii

15926 Object

CHAPTER 1 Introduction

Respondent: Miss Joanne Pilmoor [9905]

30 Temple Way.
Rayleigh
Essex
SS6 9PP
Essex
01268655186

Agent: N/A

Full Text:

I object to the additional allocation of 550 houses in RAYLEIGH between London Road and Rawreth Lane. In the past 25 years there have been approx 670 new dwellings built on Rawreth Lane, another 770 would have a significant negative impact on the local environment and put unsustainable pressure on Rayleigh's roads and amenities. The 220 houses proposed for the Rawreth Lane Industrial Estate should be viewed gratefully as a generous enough contribution. I believe that the DPD is both UNSOUND and IS NOT LEGALLY COMPLAINT. I believe that this valuable Greenbelt farm land MUST BE saved as it currently prevents the unrestricted sprawl of Western Rayleigh. The farm land currently safeguards the countryside from encroachment because once building is allowed in this vicinity there is no natural boundary until the A1245 and the small community of Rawreth, this will encourage further planning applications and the abuse and erosion of our natural heritage which would be lost forever. I believe that the DPD have failed to consider all available Brown Fields sites in the Rochford District and have actively and cynically ignored boundaries between the two individual communities of Rayleigh and Rawreth.

Summary:

- 1) UNSOUND
- 2) NOT LEGALLY COMPLIANT
- 3) UNSUSTAINABLE PRESSURE ON RAYLEIGH'S INFRASTRUCTURE.
- 4) ENCOURAGES FURTHER UNRESTRICTED SPRAWL UPTO A1245 AND RAWRETH
- 5) FAILS TO SAFEGUARD GREENBELT HERITAGE.
- 6) NOT ALL BROWNFIELDS SITES CONSIDERED FIRST.
- 7) CYNICALLY IGNORED AND MANIPULATED BOUNDARIES BETWEEN RAYLEIGH AND RAWRETH.

Change to Plan

Should use and exhaust ALL other Brown Fields Sites that are available in the Rochford District before considering the erosion of greenbelt land which must be preserved as our natural heritage.

Appear at exam? No

Soundness Tests i, ii, iii

Core Strategy Submission Document

S - 16476 - 7340 - Introduction - None

16476 Support

CHAPTER 1 Introduction

Respondent: Hockley Parish Council (Mr P Stanley) [7340] **Agent:** N/A

Hockley Parish Council
The Old Fire Station
Hockley
Essex
SS5 4QH
01702 207707

Full Text: Consultation Response to Core Strategy Submission Document September 2009

The Parish Council held an Extraordinary Meeting on 26th October 2009 to consider the above document.

Members of the public and press were invited to attend and 30 plus did so many expressing their views that were considered by the members during their later debate.

After lengthy discussion members passed a resolution as follows:

The Core Strategy is a sound document with the following comments to be noted by the District Council.

- Infrastructure before change, amongst other things especially Public Transport, Roads and Drainage.
- Allotments should be a high priority.
- Conservation Areas to be reviewed in order to provide an area in Hockley near the Parish Church in Church Road. Other parishes have conservation areas so why not Hockley?
- Housing to include rented low cost accommodation.
- Eldon Way and Foundry Business Park should be developed. with due consideration for existing businesses.

Members ask that you give careful consideration to the above points during future development of the Core Strategy.

Summary: The Core Strategy is a sound document with the following comments to be noted by the District Council.

- Infrastructure before change, amongst other things especially Public Transport, Roads and Drainage.
- Allotments should be a high priority.
- Conservation Areas to be reviewed in order to provide an area in Hockley near the Parish Church in Church Road. Other parishes have conservation areas so why not Hockley?
- Housing to include rented low cost accommodation.
- Eldon Way and Foundry Business Park should be developed. with due consideration for existing businesses.

Members ask that you give careful consideration to the above points during future development of the Core Strategy.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 15958 - 13441 - 1.2 - None

15958 Support

CHAPTER 1 1.2

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: The Core Strategy explains, clearly, its relationship to the Sustainable Community Strategy and integration with both national and regional policies. The Table, on pp 10 - 16 illustrates, clearly, the priorities and objectives of the Sustainable Community Strategy.

Summary: The Core Strategy explains, clearly, its relationship to the Sustainable Community Strategy and integration with both national and regional policies. The Table, on pp 10 - 16 illustrates, clearly, the priorities and objectives of the Sustainable Community Strategy.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16088 - 7336 - 1.4 - i

16088 Object

CHAPTER 1 1.4

Respondent: Rayleigh Town Council (Mrs K Cumberland) [7336] **Agent:** N/A

Rayleigh Town Council
The Pavilion
King George V Playing Field
Bull Lane
Rayleigh
Essex
SS6 8JD

01268 741880

Full Text: In the introduction at 1.4 there is a statement that the purpose of the Core Strategy is not to identify specific locations but goes on to state a preference later in the document for one particular area "north of London Road" (i.e. between London Road and Rawreth Lane) thus automatically ruling out consideration of a number of suitable alternatives identified in the "call for sites" exercise and is therefore unsound.

Summary: In the introduction at 1.4 there is a statement that the purpose of the Core Strategy is not to identify specific locations but goes on to state a preference later in the document for one particular area "north of London Road" (i.e. between London Road and Rawreth Lane) thus automatically ruling out consideration of a number of suitable alternatives identified in the "call for sites" exercise and is therefore unsound.

Change to Plan see comments

Appear at exam? No **Soundness Tests** i

Core Strategy Submission Document

S - 16177 - 12008 - 1.6 - None

16177 Support

CHAPTER 1 1.6

Respondent: EEDA (Mrs Juliet Richardson) [12008]

Agent: N/A

EEDA
The Business Centre
Station Road
Histon
Cambridge
CB4 9LQ
UK
01223 484632

Full Text: EEDA welcomes priority 6 of the council's Sustainable Community Strategy which seeks to encourage a thriving and enterprising economy. This will be achieved through realising the potential of London Southend Airport as a key employment opportunity within the district, and the production of a Joint Area Action Plan to strategically relocate employment land in the district. The Thames Gateway area is a national priority for regeneration and growth with the need to accommodate 3000 jobs within the district of Rochford.

Summary: EEDA welcomes priority 6 of the council's Sustainable Community Strategy which seeks to encourage a thriving and enterprising economy. This will be achieved through realising the potential of London Southend Airport as a key employment opportunity within the district, and the production of a Joint Area Action Plan to strategically relocate employment land in the district. The Thames Gateway area is a national priority for regeneration and growth with the need to accommodate 3000 jobs within the district of Rochford.

Change to Plan N/A

Appear at exam? Not Specified

Soundness Tests N/A

Core Strategy Submission Document

O - 15767 - 8435 - 1.7 - i, ii, iii

15767 Object

CHAPTER 1 1.7

Respondent: Mr Andrew Allen [8435]

36 connaught road,
Rayleigh
ss68ux
uk

Agent: N/A

Full Text: The preferred options document published Oct 2008 details, for Rayleigh, two sites. North of London Road and South West Rayleigh. In this report only the North London Road site has been identified as "preferred" and the 100 residential properties originally foreseen for the South West Rayleigh area have now been included in the North Rayleigh site (from 450 to 550). No detail as to what the impact of expanding to North London Road site in Rayleigh to accommodate the additional 100 homes is, or why no other site in Rayleigh is suitable has been provided.

Summary: The preferred options document published Oct 2008 details, for Rayleigh, two sites. North of London Road and South West Rayleigh. In this report only the North London Road site has been identified as "preferred" and the 100 residential properties originally foreseen for the South West Rayleigh area have now been included in the North Rayleigh site (from 450 to 550). No detail as to what the impact of expanding to North London Road site in Rayleigh to accommodate the additional 100 homes is, or why no other site in Rayleigh is suitable has been provided.

Change to Plan The report should detail this change and why RDC believed that expanding the North London Road site is the best solution. Provide the necessary evidence and proof of RDC diligence to enable meaningful public scrutiny.

Appear at exam? No

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 15792 - 8435 - 1.7 - i, ii, iii

15792 Object

CHAPTER 1 1.7

Respondent: Mr Andrew Allen [8435]

36 connaught road,
Rayleigh
ss68ux
uk

Agent: N/A

Full Text: It is not true that all evidence has been considered. Sites which have been submitted have not been fully considered. My site was only visited AFTER the report had been published and has still not been added to RDC's website as a submitted site! No feedback on the suitability of my site has been provided. Where is the proof that all evidence has been considered? If there is no proof then this report is unsound and the process employed in constructing this report is open to legal challenge.

If there is proof then why hasn't it been published!

Summary: It is not true that all evidence has been considered. Sites which have been submitted have not been fully considered. My site was only visited AFTER the report had been published and has still not been added to RDC's website as a submitted site! No feedback on the suitability of my site has been provided. Where is the proof that all evidence has been considered? If there is no proof then this report is unsound and the process employed in constructing this report is open to legal challenge.

If there is proof then why hasn't it been published!

Change to Plan Provide proof that all evidence was considered or consider all evidence now and redraft the core strategy document as appropriate.

Appear at exam? Yes

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 15861 - 12083 - 1.7 - i

15861 Object

CHAPTER 1 1.7

Respondent: Mr Paul Sealey [12083]

Agent: N/A

Kirrin,
Hockley Rise,
Hockley
SS5 4PT
United Kingdom
01702206888

Full Text: Whilst the Council may have 'ticked all the boxes' I do not believe they have taken to heart the objectives set out in PPS12 to "embed community responsive policy making at its heart" or "require planners to collaborate actively with a wide range of stakeholders". This is evidenced by the low percentage of responses in previous consultations a few hundred from a population of over 80,000. I believe the original options were 'loaded' to get the answer the council wanted and they have ignored suggestions that didn't fit their model.

Summary: Whilst the Council may have 'ticked all the boxes' I do not believe they have taken to heart the objectives set out in PPS12 to "embed community responsive policy making at its heart" or "require planners to collaborate actively with a wide range of stakeholders". This is evidenced by the low percentage of responses in previous consultations a few hundred from a population of over 80,000. I believe the original options were 'loaded' to get the answer the council wanted and they have ignored suggestions that didn't fit their model.

Change to Plan Go out to proper consultation involving a wider cross section of the community. Objectively assess ideas that are put forward (for example a relief road to solve the anticipated congestion). Work with partner organisations to find solutions to the problems the community is concerned about. Then come forward with a strategy that meets the need of the community.

Appear at exam? No

Soundness Tests i

Core Strategy Submission Document

O - 16468 - 7342 - 1.19 - i

16468 Object

CHAPTER 1 1.19

Respondent: Rawreth Parish Council (Mrs H Bloomfield) [7342] **Agent:** N/A

Rawreth Parish Council
103 Downhall Park
Way Rayleigh
Essex
SS6 9QZ
01268 631821

Full Text:

LDF - Preferred Options - Rayleigh conurbation.

On behalf of Rawreth Parish Council I confirm that this letter is a formal response of objection to the final draft of Rochford District Councils Core Strategy Preferred Options document.

Firstly, at no time has the Parish of Rawreth been included or mentioned in any "Tier" on page 33 of the document, the criteria for allocation of houses - within the Core Strategy. If it had been included it should have been in Tier 4 and this is, therefore, UNSOUND.

The Parish Council believes that to develop 550 houses in one place within area no: 144, land to the north of London Road and then to add a further 220 to the Rawreth Industrial Estate area will totally destroy the character and rural outlook of Rawreth and surrounding areas. It will destroy the residents' "strong sense of identity within their own settlement" and is, therefore, UNSOUND.

The huge development of 550 houses is totally unacceptable. The land north of London Road is good quality agricultural land which is protected by the Green Belt -GB1 - fulfils all purposes under PPG2 and should be retained as such. Once used for development this land can never be returned to agricultural use, and if you continue to erode into our Green Belt and farmland it will be lost forever.

The Parish Council believe a proportion of the houses required to be built in our area should compliment and enhance Rawreth, cause as little extra congestion to our already heavily overcrowded roads as possible and provide a pleasant environment for those people wishing to move to the area. This particular area is part of the "Gateway to Rochford" and is the "strategic buffer" between Rayleigh and Wickford. Reference is made in the Core Strategy document to "avoiding coalescence" of villages/towns, however a development of this size immediately erodes the buffer between Rayleigh, Rawreth and Wickford, starts coalescence, destroys the rural character of Rawreth and, therefore, is UNSOUND.

The Core Strategy Document details Rochford District Councils priorities and objectives and details how the role of the Core Strategy features in achieving these. In support of the Parish Councils observations and alternative proposals they comment as follows.

Page 5 "Fostering greater community cohesion"

Development of land between Rawreth Lane and north of London Road will not give any community cohesion at all, it will simply be an extension to the west of Rayleigh giving residents no real sense of belonging, they will live within the Parish of Rawreth, yet they will be considered as living in Rayleigh as has been proved with other developments along Rawreth Lane such as Laburnum Way.

Page 12 "Priority 5 Essex roads are safer less congested and everyone has access to essential services"

The roads and infrastructure in the Rawreth area are completely full to capacity. The A127, A1245, A129 London Road, Rawreth Lane and Watery Lane just cannot take any more traffic and the proposed development on land to the north of London Road will increase traffic to a completely unsustainable level. On numerous occasions this year incidents within and on the outskirts of the Parish have brought traffic to a standstill for hours along London Road, Rawreth Lane, Watery Lane/Beeches Road and the Hullbridge Road. It took some residents 1 ¼ hours to proceed along Rawreth Lane and into Hullbridge - a distance of 1 1/2 miles.

The proposed development at the western edge of Hullbridge, which is, in fact, largely in Rawreth would also greatly increase the traffic problems in the area. Rawreth Parish Council understand there would be a proposal to "widen/straighten" Watery Lane/Beeches Road, with a roundabout at the junction with the Hullbridge Road. This is an extremely dangerous junction even at the present time and would become increasingly so. There is also the question of where the traffic would go when it reaches Battlesbridge at the Western end, it cannot possibly cross the Bridge as this is "restricted" and in a Conservation Area, therefore, it would have to turn left and proceed to the A1245 - a very dangerous junction.

Beeches Road/Watery Lane is also shown in the document as a new cyclist route. Surely this is a conflict of interest, a road widening/straightening proposal coupled with a cycle route.

Page 33 "Tier Settlements"

Nowhere in the Core Strategy Document is Rawreth Parish actually mentioned, it features in the "all other settlements tier 4" and is referred to as "land north of London Road Rayleigh" or "West Rayleigh" yet, the housing allocation of 550 dwellings between 2015 and 2021 and the 220 planned for the Rawreth Industrial Estate is the largest that any area is taking. Rawreth Parish currently has 380 dwellings and an electorate of 812, yet the proposed housing figures are set to increase the overall number of dwellings in the Parish by 203%.

Pages 34 to 36 "The efficient use of land for housing" and "Extensions to residential envelopes and phasing"

The Core Strategy Document states that "the Council recognises the importance of making best use of brownfield land" and "whilst the Council acknowledge that the housing requirement stipulated in the East of England Plan is a minimum, it must also be mindful of the need to maintain Green Belt as far as possible" yet the proposed 550 houses on the land

16468 Object

CHAPTER 1 1.19

north of London Road will all be built on Green Belt land of high agricultural value. The document states that "the Council will direct development to the most sustainable locations on the edge of settlements having regard to:"

"The potential to avoid areas of constraint (such as areas at risk of flooding, sites of ecological importance"

"The historical, agricultural and ecological value of land"

"The potential to create a defensible Green Belt Boundary and

"The avoidance of coalescence with neighbouring settlements"

Yet these key factors all seem to have been ignored when choosing the site to the north of London Road and, therefore, the proposal is UNSOUND. The Parish of Rawreth has a history of flooding, the land in Rawreth Lane will drain into the already overloaded brook system and the Services in the area would be unable to cope with this increase in housing - drains and sewers are already working to capacity. Heavy rain earlier in the year resulted in flooding in Watery Lane and the Rawreth Brook system has been very close to flooding twice already this year. During a meeting between the Parish Council and the Environment Agency we were advised that this situation will worsen with increased housing.

Page 42 "Gypsy and Traveller Accommodation"

This section details the need for an allocation of 15 pitches by 2011, it also states that they "will examine the potential of current unauthorised sites to meet this need" and that "sites will be allocated in the west of the District" The west of the District is in fact Rawreth, but yet again the Parish name has not been detailed. The Parish already has an unauthorised site which is the subject of an enforcement case and although well kept is on the brow of a hill on a main highway with restricted access which Essex County Council have already raised concerns about, this is not a site that should be considered as part of the requirement due to its location, but also, why is the allocation of all 15 pitches being detailed to one area?

Page 43 to 44 "Appendix 1"

Details of all the infrastructure to accompany residential development is listed, yet there are no detailed costs, have these been done? And are these achievable? Large numbers of housing in one area, as stated in the infrastructure requirements, will necessitate a new primary school. County figures suggest that there will be surplus places in Rayleigh schools even with new housing. Obviously these will be in the wrong parts of the town so increasing the risk that an existing school could close. It makes sense to spread the development in smaller sites around the town, avoiding closure and preventing unnecessary provision of a new school.

Page 57 "Strategies, Activities and Actions - The Green Belt"

The document states that "The Council will continue to support the principals of restricting development in the Green Belt, as set out in PPG2 and will preserve the character and openness of the Green Belt" it further states that "a small proportion of the District's Green Belt will have to have its designation reviewed to allow development" The entire development of 550 houses planned for land north of London Road is all on Green Belt land as is the land at Hullbridge, how does this equate to a "small proportion"?

The Councils own Policy GB1- Green Belt Protection states "The Council will allocate the minimum amount of Green Belt land necessary to meet the District's housing and employment needs" and that they will "direct development away from the Green Belt as far as is practicable and will prioritise the protection of the Green Belt land based on how well the land helps achieve the purposes of the Green Belt".

This area of land confirms all 5 purposes of the national PPG2 - Green Belt:-

It prevents the unrestricted sprawl of western Rayleigh

It provides a barrier to prevent the ultimate merging of Rayleigh, Rawreth and Wickford

It assists in safeguarding the countryside from encroachment

It preserves the setting and special character of historic towns

Assists in urban regeneration, by encouraging the recycling of derelict and other urban land

Rawreth Parish Council have observed that there are a number of sites that were put forward in the "Call for Sites" that are pre-used brownfield land in the Green Belt land, and as such would prove beneficial and in their opinion should have been considered for development. Their non-inclusion as "brownfield" sites makes the current proposals

UNSOUND:

Site No; 73 Hambro Nursery a site of approximately 3.93 hectares, coupled with the adjacent site Clovelly, would provide between 200 and 250 houses in an area of approximately 4.85 hectares this area would have good access directly from the A1245 and if expanded north westward to include land up to and around the Village Hall, approximately another 2.08 hectares could produce between 50 and 80 further houses. This area could be accessed either from the slip road (Chelmsford Road) to the south of the Nevendon Garage or from Church Road.

Both of these sites would remove the need for extra traffic along the A129 and Rawreth Lane which are both already operating well over maximum capacity. This development would require a footbridge for pedestrians, cyclists and horses over the A1245.

Rawreth Parish Council believe these proposals would be sensible infill of these areas and would be on "Brownfield" sites where current businesses are not particularly progressive and would not result in the loss of many jobs. Our figures are quite conservative and we believe that if these sites were chosen a much reduced number of houses would need to be built "North of London Road" on Green Belt land.

Phase 2 - With regard to the houses that are proposed for the Northeast corner of Rawreth/Hullbridge, the Parish Council are concerned that any development would cause considerable extra congestion to the immediate roads. We understand that the thoughts are to "straighten" and improve parts of Watery Lane and Beeches Road to provide access to and through Battlesbridge - a conservation area. Recent experience of deep flooding in Watery Lane with the road closed for several days on 3 occasions in the early part of 2009 proves that this proposal is completely unsustainable. The local drainage systems simply cannot take the amount of run-off experienced now and with further development this

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O - 16468 - 7342 - 1.19 - i

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would increase the problem.

If this development is to go ahead, the Parish Council believe that a relief road should be built, from the end of Watery Lane, skirting to the west of the Rayleigh Park Estate, crossing Rawreth Lane at a mini-roundabout and entering a vastly improved A129 at approximately Lower Barn Farm. This would take any necessary traffic in and out of the area efficiently.

The Parish Council further believe that the Michelins Farm site No: 49 would be an ideal site for the Rawreth Industrial Estate. This would adjoin proposed industrial sites within the Basildon District and would provide excellent road and transport links. Rawreth Parish Council also proposed that the land opposite Michelins Farm could be used to re-site the illegal Gypsy/Traveller site that is currently situated on the busy A1245. The land opposite Michelins Farm would not only be a much safer site for Gypsy/Traveller pitches, but the correct use of the land would also ensure the environmental improvement of the site as a whole.

All of the above proposals were submitted to Rochford District Council, but they were not taken into consideration in the final draft resulting in the predominant use of Green Belt land for development, bounded by already congested roads and, therefore, the proposals are UNSOUND.

Summary: Page 5 "Fostering greater community cohesion"

Development of land between Rawreth Lane and north of London Road will not give any community cohesion at all, it will simply be an extension to the west of Rayleigh giving residents no real sense of belonging, they will live within the Parish of Rawreth, yet they will be considered as living in Rayleigh as has been proved with other developments along Rawreth Lane such as Laburnum Way.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16699 - 9072 - 1.20 - i

16699 Object

CHAPTER 1 1.20

Respondent: Essex County Council (Mr Roy Lewis) [9072] **Agent:** N/A

Essex County Council
ESH - Spatial Planning
Planning and Transport
County Hall
Chelmsford
CM1 4JU
01245-437578

Full Text: ROCHFORD CORE STRATEGY SUBMISSION DOCUMENT, SEPTEMBER 2009
RESPONSE OF ESSEX COUNTY COUNCIL

1. General Comment

Essex County Council welcomes and broadly supports the Core Strategy prepared by Rochford District Council. The Strategy contains policies and proposals that address the spatial characteristics, issues and opportunities facing the District whilst respecting the distinctive qualities of the different settlements and parts of the District.

The County Council fully supports the maintenance of a strong policy approach to protection of the Green Belt and of the quality of environmental assets in the District whilst making adequate housing and employment provision within the District. The Core Strategy presents an approach that emphasises a balance of opportunity through the District and recognition of emerging economic prospects in the District and neighbouring areas. The intended preparation of more detailed Action Area Plans for London Southend Airport and its environs and for each of the three town centres of Rayleigh, Rochford and Hockley will further enhance the approach of the Core Strategy. The emphasis on the three town centres is particularly welcomed as offering a stimulus to improvement in the services and facilities available locally within the District whilst also affording possibilities of increased community focus.

2. Housing Distribution and Locations

The East of England Plan requires Rochford to provide a minimum of 3,790 additional dwellings between 2006 and 2021. In addition, provision for a further 1,000 dwellings should be made between 2021 and 2025 to ensure delivery of housing for at least 15 years from adoption of the Core Strategy (expected in 2010). Of this total requirement the District Council has identified a capacity of 2,000 dwellings through a Strategic Housing Land Availability Assessment. This means that the Core Strategy has to identify locations for about 1,750 dwellings to be delivered before 2021 and a further 1,000 dwellings between 2021 and 2025.

Policy H1 (The efficient use of land for housing) is supported. However, prioritisation of the reuse of previously developed land within settlements for additional housing is unlikely to provide a sufficient source of provision due to the generally residential nature of existing settlements in the district and the absence of potentially large sites of previously developed land. The assessment of potential for additional housing provision within settlements already includes the proposed re-allocation to substantially residential use of 4 existing employment areas.

Within Policy H2 (Extensions to residential envelopes and phasing) and Policy H3 (Extension to residential envelopes post-2021) the District Council has adopted a balanced approach to the distribution of additional housing locations, which is based on identification of tiers of settlements defined by reference to their accessibility to jobs, services and facilities (some of which lie outside the District) and the need to protect the valued environments within the District. This approach is generally supported, although implementation and delivery of individual schemes should give further thought to securing sustainable functional relationships between proposed development locations and availability of jobs, services and facilities.

The proposed scale and phasing of development at each of the identified locations in Policy H2 and Policy H3 should be capable of being supported by County Council service groups, provided that adequate and timely funding is available. The County Council would wish to work with the District Council to ensure that future infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

3. Economic Development

The approach to Employment Growth (Policy ED1) is supported. Given the economic structure of Rochford District the support to be given to protection and enhancement of the role of small and medium sized businesses; enhancement of the District's commercial centres; and development of a skills training academy is particularly welcome. These measures will assist in building on the existing economic resource of the District.

Proposals for the comprehensive development of London Southend Airport and its environs (Policy ED2) are supported.

16699 Object

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The further elaboration of proposals through an Area Action Plan will provide a firm foundation to realise the economic regeneration and growth opportunities presented by effective use of the Airport. The recognition of the potential environmental impact of the Airport and the commitment to work to mitigate any adverse impacts on the environment and local amenities is fully supported.

The location of the proposed Eco-Enterprise Centre to the North of London Southend Airport (Policy ED4) is supported. Creation of the Centre would assist reduction of the rate of business start-up failure in the district. Further the proposed location for the Centre would afford a clear offer to businesses within an area of varied business activity.

The continued protection and enhancement of existing employment land (Policy ED3) is supported, as is the identification of 4 existing employment sites for appropriate alternative, substantially residential, uses. Each of the 4 sites affords particular issues and opportunities whereby their redevelopment for other uses and relocation of existing occupiers would confer advantage for the immediately neighbouring areas and for the District as a whole.

4. Town Centres

The town centres of Rayleigh, Rochford and Hockley, and future plans for them, are closely linked to the economic development of the District but also present the opportunity to offer greater community focus within the District. The varied approach being taken to each of these town centres is supported (Policy RTC4, RTC5 and RTC6), notably the recognition of the role and purpose of the town centres beyond retail uses.

The contribution that the County Library service could make to plans for the town centres should not be overlooked. The 5 libraries in the District are substantial footfall draws in their localities and act as a 'community anchor store'. This has knock-on effects in encouraging use of neighbouring retail and service facilities. Further the Library service is currently looking at co-location opportunities for other services within the libraries which would enable them to act as a community focus.

5. Transport

The transport aspects of the Core Strategy are well balanced in identifying potential measures that would meet the needs of existing residents and businesses in the District as well as needs arising from future development. The approach reflects and makes good reference to the transportation aspirations of the County Council. The policy emphasis on close working between the District Council and the County Council to advance the transport aspirations is welcomed and fully supported.

In relation to parking standards (Policy T8 and Paragraph 10.30) the review undertaken by Essex County Council in conjunction with the Essex Planning Officers Association has now been completed. Revised parking standards have been agreed and signed off as County Supplementary Guidance, in accordance with PPS12, and is being applied by the County Council as Local Highways Authority.

6. Coastal Protection Belt

Policy ENV2 (Coastal Protection Belt) is not supported because in its current form it is not a suitable or effective replacement policy for Policy CC1 of the Replacement Structure Plan. Structure Plan Policy CC1 (The Undeveloped Coast - Coastal Protection Belt) currently remains a 'saved' policy of the Essex and Southend-on-Sea Replacement Structure Plan, April 2001 (following a direction of the Secretary of State, dated 27th September 2007, under paragraph 1(3) of Schedule 8 to the Planning and Compulsory Purchase Act 2004). The existing Policy CC1 reads, 'Within the Coastal Protection Belt defined in adopted local plans there shall be the most stringent restrictions on development within the rural and undeveloped coastline situated outside existing built-up areas, and any development which is exceptionally permitted within this Belt shall not adversely affect the open and rural character, historic features or wildlife.'

Core Strategy Policy ENV2 should be revised to include specific reference to,

- * Definition of the boundary of the Coastal Protection Belt in another Development Plan Document;
- * the application of the most stringent restrictions on development within the rural and undeveloped coastline;
- * any development exceptionally permitted not adversely affecting the open and rural character, historic features or wildlife.

7. Historic Environment

The importance of the historic environment in Rochford District is clearly identified within the Core Strategy document. Nevertheless, the policy guidance could be usefully enhanced to promote consideration and enhancement of the historic environment and use of the historic environment to shape place. This would be achieved by the following amendments to the Core Strategy,

- * Policy ENV1 (Protection and Enhancement of the Natural Landscape and Habitats and the Protection of Historical and Archaeological Sites) should be amended by deletion of the final sentence and its replacement with, The Council is committed to the protection, promotion and enhancement of the diverse historic landscape and extensive surviving archaeological deposits of the District.

16699 Object

CHAPTER 1 1.20

* Paragraph 8.15 of the supporting text should be amended to better support the suggested amendment to Policy ENV1. The existing text of Paragraph 8.15 should be deleted in its entirety and replaced by,
The historic environment of Rochford District has developed through a history of human activity that spans over 450,000 years. Much of the resource lies hidden beneath the ground in the form of archaeological deposits. Other elements such as the historic landscape, the pattern of field, farms, woods and grazing marsh which characterise the District, are a highly visible record of millennia of agriculture, industry and commerce. Of particular significance are the coastal, island and estuarine areas where multi-period landscapes reflecting the exploitation of coastal and marshland resource survive. The District also includes the important historic medieval market towns of Rochford and Rayleigh.

* Page 16 (Sustainable Community Strategy Priority: Promoting a Greener District) should be amended to further support the approach to the Historic Environment. The fourth bullet of the Key Section/Policies of the Core Strategy should be amended to include the word 'historic', so that the first sentence of the bullet would read,
The Environment chapter seeks to protect and enhance the biodiversity, historic and natural environment of the District by protecting sites of local, national and international importance.

8. Community Infrastructure

The approach to Community Infrastructure is supported. The County Council would wish to work with the District Council to ensure that future community infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

In addition, it should be noted that,

* Some County Council services are not highly visible despite being regarded as highly desirable community services by local residents. The need to ensure adequate funding and contributions to enable these services to meet community expectations should be recognised and acknowledged in consideration of planning obligations and standard charges.

* The Adult Community Learning Centre at Rocheway, Rochford could be better located with regard to the wider Rochford/Castle Point area of service. Relocation of the Centre could provide opportunities both at the new location and for the current site.

* The Core Strategy should make specific reference to,

o Appendix H1, Location at South Canewdon: new Early Years and Childcare facilities;

o Policy CLT2, final sentence: insert after the words 'primary schools' the words 'and Early Years and Childcare facilities';

o Appendix CLT1, Other issues/comment: for Early years and childcare facilities add 'Land to be allocated within new residential areas, as appropriate'.

9. Implementation, Delivery and Monitoring

The inclusion in the Core Strategy of a section considering Implementation, Delivery and Monitoring is welcomed and supported. Nevertheless, the District Council, in moving towards implementation and delivery of the individual elements of the Core Strategy, should highlight those schemes and projects that are critical to achievement of other aspects of the Strategy.

Further, the monitoring proposal for Policy H6 (Lifetime Homes) and for Policy CP1 (Design) should be amended,

* Policy H6 (Lifetime Homes) - the identified monitoring tool is Core Indicator H6 Housing Quality Building for Life Assessments. The Building for Life Assessment methodology was devised to measure the overall design/layout quality of housing developments. It was not devised to measure compliance with Lifetime Homes, which is largely, but not exclusively, concerned with internal space standards and the provision of internal arrangements within dwellings to meet needs of all residents.

* Policy CP1 (Design) - the monitoring indicator proposed by the Core Strategy is not supported because it is unclear what the indicator would actually be measuring. The proposed indicator should be replaced by the Core Indicator, Housing Quality - Building for Life Assessments, as suggested by the County Council in its response to the Core Strategy Preferred Options, October 2008. A better approach would be to base evaluation and monitoring of Policy CP1 on the Commission for Architecture and the Built Environment's (CABE) 20 Building for Life principles, particularly as Government has endorsed these principles and is urging local authorities to use them to assess design quality. It is suggested that the monitoring arrangements for Preferred Option CP1 be deleted and replaced by the following text, 'The success of the implementation of this policy will be monitored by assessing schemes, or an appropriate sample of schemes, against the Commission for Architecture and the Built Environment's (CABE) Building for Life principles.'

10. Access to Housing

The Core Strategy notes the higher prevalence of older people in Rochford District and the need to support them. However, a more broadly based approach to access to housing should be adopted by Policies H4, H5 and H6. It should recognise the presence of other vulnerable adults in the community, for example, those with learning or mental health disability, and the range of possible forms of accommodation, including supported, sheltered and extra care accommodation. The high level of owner occupation in the District further emphasises the need for a broader approach. The emphasis on Lifetime Homes would not address the variety of future needs, whilst the potential exemptions to the

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O - 16699 - 9072 - 1.20 - i

16699 Object

CHAPTER 1 1.20

Summary: Lifetime Homes policy standard in Policy H6 are likely to act against demographic trends. The importance of the historic environment in Rochford District is clearly identified within the Core Strategy document. Nevertheless, the policy guidance could be usefully enhanced to promote consideration and enhancement of the historic environment and use of the historic environment to shape place. This would be achieved by the following amendments to the Core Strategy,

Change to Plan * Page 16 (Sustainable Community Strategy Priority: Promoting a Greener District) should be amended to further support the approach to the Historic Environment. The fourth bullet of the Key Section/Policies of the Core Strategy should be amended to include the word 'historic', so that the first sentence of the bullet would read, The Environment chapter seeks to protect and enhance the biodiversity, historic and natural environment of the District by protecting sites of local, national and international importance.

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 15959 - 13441 - 1.23 - iii

15959 Object

CHAPTER 1 1.23

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: A link is made to the Local Area Agreement. The form of words implies that the Core Strategy is a delivery plan for the LAA.

Summary: A link is made to the Local Area Agreement. The form of words implies that the Core Strategy is a delivery plan for the LAA.

Change to Plan Editorial change to make clear that both the Core Strategy and LAA support the Sustainable Community Strategy

Appear at exam? No **Soundness Tests** iii

Core Strategy Submission Document

O - 16469 - 7342 - 1.23 - i

16469 Object

CHAPTER 1 1.23

Respondent: Rawreth Parish Council (Mrs H Bloomfield) [7342] **Agent:** N/A

Rawreth Parish Council
103 Downhall Park
Way Rayleigh
Essex
SS6 9QZ
01268 631821

Full Text:

LDF - Preferred Options - Rayleigh conurbation.

On behalf of Rawreth Parish Council I confirm that this letter is a formal response of objection to the final draft of Rochford District Councils Core Strategy Preferred Options document.

Firstly, at no time has the Parish of Rawreth been included or mentioned in any "Tier" on page 33 of the document, the criteria for allocation of houses - within the Core Strategy. If it had been included it should have been in Tier 4 and this is, therefore, UNSOUND.

The Parish Council believes that to develop 550 houses in one place within area no: 144, land to the north of London Road and then to add a further 220 to the Rawreth Industrial Estate area will totally destroy the character and rural outlook of Rawreth and surrounding areas. It will destroy the residents' "strong sense of identity within their own settlement" and is, therefore, UNSOUND.

The huge development of 550 houses is totally unacceptable. The land north of London Road is good quality agricultural land which is protected by the Green Belt -GB1 - fulfils all purposes under PPG2 and should be retained as such. Once used for development this land can never be returned to agricultural use, and if you continue to erode into our Green Belt and farmland it will be lost forever.

The Parish Council believe a proportion of the houses required to be built in our area should compliment and enhance Rawreth, cause as little extra congestion to our already heavily overcrowded roads as possible and provide a pleasant environment for those people wishing to move to the area. This particular area is part of the "Gateway to Rochford" and is the "strategic buffer" between Rayleigh and Wickford. Reference is made in the Core Strategy document to "avoiding coalescence" of villages/towns, however a development of this size immediately erodes the buffer between Rayleigh, Rawreth and Wickford, starts coalescence, destroys the rural character of Rawreth and, therefore, is UNSOUND.

The Core Strategy Document details Rochford District Councils priorities and objectives and details how the role of the Core Strategy features in achieving these. In support of the Parish Councils observations and alternative proposals they comment as follows.

Page 5 "Fostering greater community cohesion"

Development of land between Rawreth Lane and north of London Road will not give any community cohesion at all, it will simply be an extension to the west of Rayleigh giving residents no real sense of belonging, they will live within the Parish of Rawreth, yet they will be considered as living in Rayleigh as has been proved with other developments along Rawreth Lane such as Laburnum Way.

Page 12 "Priority 5 Essex roads are safer less congested and everyone has access to essential services"

The roads and infrastructure in the Rawreth area are completely full to capacity. The A127, A1245, A129 London Road, Rawreth Lane and Watery Lane just cannot take any more traffic and the proposed development on land to the north of London Road will increase traffic to a completely unsustainable level. On numerous occasions this year incidents within and on the outskirts of the Parish have brought traffic to a standstill for hours along London Road, Rawreth Lane, Watery Lane/Beeches Road and the Hullbridge Road. It took some residents 1 ¼ hours to proceed along Rawreth Lane and into Hullbridge - a distance of 1 1/2 miles.

The proposed development at the western edge of Hullbridge, which is, in fact, largely in Rawreth would also greatly increase the traffic problems in the area. Rawreth Parish Council understand there would be a proposal to "widen/straighten" Watery Lane/Beeches Road, with a roundabout at the junction with the Hullbridge Road. This is an extremely dangerous junction even at the present time and would become increasingly so. There is also the question of where the traffic would go when it reaches Battlesbridge at the Western end, it cannot possibly cross the Bridge as this is "restricted" and in a Conservation Area, therefore, it would have to turn left and proceed to the A1245 - a very dangerous junction.

Beeches Road/Watery Lane is also shown in the document as a new cyclist route. Surely this is a conflict of interest, a road widening/straightening proposal coupled with a cycle route.

Page 33 "Tier Settlements"

Nowhere in the Core Strategy Document is Rawreth Parish actually mentioned, it features in the "all other settlements tier 4" and is referred to as "land north of London Road Rayleigh" or "West Rayleigh" yet, the housing allocation of 550 dwellings between 2015 and 2021 and the 220 planned for the Rawreth Industrial Estate is the largest that any area is taking. Rawreth Parish currently has 380 dwellings and an electorate of 812, yet the proposed housing figures are set to increase the overall number of dwellings in the Parish by 203%.

Pages 34 to 36 "The efficient use of land for housing" and "Extensions to residential envelopes and phasing"

The Core Strategy Document states that "the Council recognises the importance of making best use of brownfield land" and "whilst the Council acknowledge that the housing requirement stipulated in the East of England Plan is a minimum, it must also be mindful of the need to maintain Green Belt as far as possible" yet the proposed 550 houses on the land

16469 Object

CHAPTER 1 1.23

north of London Road will all be built on Green Belt land of high agricultural value. The document states that "the Council will direct development to the most sustainable locations on the edge of settlements having regard to:"

"The potential to avoid areas of constraint (such as areas at risk of flooding, sites of ecological importance"

"The historical, agricultural and ecological value of land"

"The potential to create a defensible Green Belt Boundary and

"The avoidance of coalescence with neighbouring settlements"

Yet these key factors all seem to have been ignored when choosing the site to the north of London Road and, therefore, the proposal is UNSOUND. The Parish of Rawreth has a history of flooding, the land in Rawreth Lane will drain into the already overloaded brook system and the Services in the area would be unable to cope with this increase in housing - drains and sewers are already working to capacity. Heavy rain earlier in the year resulted in flooding in Watery Lane and the Rawreth Brook system has been very close to flooding twice already this year. During a meeting between the Parish Council and the Environment Agency we were advised that this situation will worsen with increased housing.

Page 42 "Gypsy and Traveller Accommodation"

This section details the need for an allocation of 15 pitches by 2011, it also states that they "will examine the potential of current unauthorised sites to meet this need" and that "sites will be allocated in the west of the District" The west of the District is in fact Rawreth, but yet again the Parish name has not been detailed. The Parish already has an unauthorised site which is the subject of an enforcement case and although well kept is on the brow of a hill on a main highway with restricted access which Essex County Council have already raised concerns about, this is not a site that should be considered as part of the requirement due to its location, but also, why is the allocation of all 15 pitches being detailed to one area?

Page 43 to 44 "Appendix 1"

Details of all the infrastructure to accompany residential development is listed, yet there are no detailed costs, have these been done? And are these achievable? Large numbers of housing in one area, as stated in the infrastructure requirements, will necessitate a new primary school. County figures suggest that there will be surplus places in Rayleigh schools even with new housing. Obviously these will be in the wrong parts of the town so increasing the risk that an existing school could close. It makes sense to spread the development in smaller sites around the town, avoiding closure and preventing unnecessary provision of a new school.

Page 57 "Strategies, Activities and Actions - The Green Belt"

The document states that "The Council will continue to support the principals of restricting development in the Green Belt, as set out in PPG2 and will preserve the character and openness of the Green Belt" it further states that "a small proportion of the District's Green Belt will have to have its designation reviewed to allow development" The entire development of 550 houses planned for land north of London Road is all on Green Belt land as is the land at Hullbridge, how does this equate to a "small proportion"?

The Councils own Policy GB1- Green Belt Protection states "The Council will allocate the minimum amount of Green Belt land necessary to meet the District's housing and employment needs" and that they will "direct development away from the Green Belt as far as is practicable and will prioritise the protection of the Green Belt land based on how well the land helps achieve the purposes of the Green Belt".

This area of land confirms all 5 purposes of the national PPG2 - Green Belt:-

It prevents the unrestricted sprawl of western Rayleigh

It provides a barrier to prevent the ultimate merging of Rayleigh, Rawreth and Wickford

It assists in safeguarding the countryside from encroachment

It preserves the setting and special character of historic towns

Assists in urban regeneration, by encouraging the recycling of derelict and other urban land

Rawreth Parish Council have observed that there are a number of sites that were put forward in the "Call for Sites" that are pre-used brownfield land in the Green Belt land, and as such would prove beneficial and in their opinion should have been considered for development. Their non-inclusion as "brownfield" sites makes the current proposals

UNSOUND:

Site No; 73 Hambro Nursery a site of approximately 3.93 hectares, coupled with the adjacent site Clovelly, would provide between 200 and 250 houses in an area of approximately 4.85 hectares this area would have good access directly from the A1245 and if expanded north westward to include land up to and around the Village Hall, approximately another 2.08 hectares could produce between 50 and 80 further houses. This area could be accessed either from the slip road (Chelmsford Road) to the south of the Nevendon Garage or from Church Road.

Both of these sites would remove the need for extra traffic along the A129 and Rawreth Lane which are both already operating well over maximum capacity. This development would require a footbridge for pedestrians, cyclists and horses over the A1245.

Rawreth Parish Council believe these proposals would be sensible infill of these areas and would be on "Brownfield" sites where current businesses are not particularly progressive and would not result in the loss of many jobs. Our figures are quite conservative and we believe that if these sites were chosen a much reduced number of houses would need to be built "North of London Road" on Green Belt land.

Phase 2 - With regard to the houses that are proposed for the Northeast corner of Rawreth/Hullbridge, the Parish Council are concerned that any development would cause considerable extra congestion to the immediate roads. We understand that the thoughts are to "straighten" and improve parts of Watery Lane and Beeches Road to provide access to and through Battlesbridge - a conservation area. Recent experience of deep flooding in Watery Lane with the road closed for several days on 3 occasions in the early part of 2009 proves that this proposal is completely unsustainable. The local drainage systems simply cannot take the amount of run-off experienced now and with further development this

Core Strategy Submission Document

O - 16469 - 7342 - 1.23 - i

16469 Object

CHAPTER 1 1.23

would increase the problem.

If this development is to go ahead, the Parish Council believe that a relief road should be built, from the end of Watery Lane, skirting to the west of the Rayleigh Park Estate, crossing Rawreth Lane at a mini-roundabout and entering a vastly improved A129 at approximately Lower Barn Farm. This would take any necessary traffic in and out of the area efficiently.

The Parish Council further believe that the Michelins Farm site No: 49 would be an ideal site for the Rawreth Industrial Estate. This would adjoin proposed industrial sites within the Basildon District and would provide excellent road and transport links. Rawreth Parish Council also proposed that the land opposite Michelins Farm could be used to re-site the illegal Gypsy/Traveller site that is currently situated on the busy A1245. The land opposite Michelins Farm would not only be a much safer site for Gypsy/Traveller pitches, but the correct use of the land would also ensure the environmental improvement of the site as a whole.

All of the above proposals were submitted to Rochford District Council, but they were not taken into consideration in the final draft resulting in the predominant use of Green Belt land for development, bounded by already congested roads and, therefore, the proposals are UNSOUND.

Summary:

Page 12 "Priority 5 Essex roads are safer less congested and everyone has access to essential services"

The roads and infrastructure in the Rawreth area are completely full to capacity. The A127, A1245, A129 London Road, Rawreth Lane and Watery Lane just cannot take any more traffic and the proposed development on land to the north of London Road will increase traffic to a completely unsustainable level. On numerous occasions this year incidents within and on the outskirts of the Parish have brought traffic to a standstill for hours along London Road, Rawreth Lane, Watery Lane/Beeches Road and the Hullbridge Road. It took some residents 1 ¼ hours to proceed along Rawreth Lane and into Hullbridge - a distance of 1 1/2 miles.

The proposed development at the western edge of Hullbridge, which is, in fact, largely in Rawreth would also greatly increase the traffic problems in the area. Rawreth Parish Council understand there would be a proposal to "widen/straighten" Watery Lane/Beeches Road, with a roundabout at the junction with the Hullbridge Road. This is an extremely dangerous junction even at the present time and would become increasingly so. There is also the question of where the traffic would go when it reaches Battlesbridge at the Western end, it cannot possibly cross the Bridge as this is "restricted" and in a Conservation Area, therefore, it would have to turn left and proceed to the A1245 - a very dangerous junction.

Beeches Road/Watery Lane is also shown in the document as a new cyclist route. Surely this is a conflict of interest, a road widening/straightening proposal coupled with a cycle route.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

S - 15961 - 13441 - 1.24 - None

15961 Support

CHAPTER 1 1.24

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: The Core Strategy sets the spatial framework for Rochford until 2025. It is unclear why the Core Strategy is linked to priorities in the LAA, nor why a review of the Core Strategy should be necessary so soon after Examination in Public.

Summary: The Core Strategy sets the spatial framework for Rochford until 2025. It is unclear why the Core Strategy is linked to priorities in the LAA, nor why a review of the Core Strategy should be necessary so soon after Examination in Public.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 15962 - 13441 - 1.25 - None

15962 Support

CHAPTER 1 1.25

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: The Core Strategy correctly identifies the dwelling, jobs and additional Gypsy and Traveller pitch requirements as specified in the East of England Plan. However, East of England Plan Policy H3 also requires a 3% compound increase in provision after 2011. There is no Core Strategy commitment to providing post-2011 Gypsy and Traveller accommodation, merely a statement that additional pitches will be subject to review of further need. You should take a view on whether Core Strategy Policy H7 is in conformity with the East of England Plan.

Summary: The Core Strategy correctly identifies the dwelling, jobs and additional Gypsy and Traveller pitch requirements as specified in the East of England Plan. However, East of England Plan Policy H3 also requires a 3% compound increase in provision after 2011. There is no Core Strategy commitment to providing post-2011 Gypsy and Traveller accommodation, merely a statement that additional pitches will be subject to review of further need. You should take a view on whether Core Strategy Policy H7 is in conformity with the East of England Plan.

Change to Plan N/A

Appear at exam? Not Specified

Soundness Tests N/A

Core Strategy Submission Document

S - 15963 - 13441 - 1.25 - None

15963 Support

CHAPTER 1 1.25

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: The Core Strategy text is slightly misleading. The East of England Plan identifies a role for Southend Airport as catering for local and niche markets and being a catalyst for regeneration of nearby towns. Local authorities should make provision for direct and indirect employment generated by the airport.

Summary: The Core Strategy text is slightly misleading. The East of England Plan identifies a role for Southend Airport as catering for local and niche markets and being a catalyst for regeneration of nearby towns. Local authorities should make provision for direct and indirect employment generated by the airport.

Change to Plan N/A

Appear at exam? Not Specified

Soundness Tests N/A

Core Strategy Submission Document

O - 16136 - 13096 - 1.25 - i

16136 Object

CHAPTER 1 1.25

Respondent: Mr Alan West [13096]

37 Woodlands Road
Hockley
Essex
SS5 4PL
United Kingdom

Agent: N/A

Full Text: Given the high level of opposition to the proposed expansion of London Southend Airport, it is therefore unsound to depend on it as a driver for economic development.

Summary: Given the high level of opposition to the proposed expansion of London Southend Airport, it is therefore unsound to depend on it as a driver for economic development.

Change to Plan Qualify or remove reference to airport.

Appear at exam? No

Soundness Tests i

Core Strategy Submission Document

O - 16719 - 7834 - 1.25 - i

16719 Object

CHAPTER 1 1.25

Respondent: Ms G Yeadell [7834]

6 Southend Road
Hockley
Essex
SS5 4QQ
01702 205450

Agent: N/A

Full Text: Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1

Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2 you discarded N.E.Hockley as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley..along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

Response to C.S Preferred Options 2008 and HAAP 2009

June 2009 issue C S Submission issue says Eldon Way will be used for housing, whereas Sept.2009 issue says "alternative uses, including residential.." to be decided by HAAP (Issues consultation done, Pref.Options issue awaited, but judging from JAAP Pref.Options decision - namely biggest option chosen against overriding opposition, it will be housing).

Need to be logical and even-handed in proposals

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

Establish likely level of Standard Charges. Accept you cannot turn district into motorways with wholesale demolition.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

Para.10.5 "..highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which cannot be altered without much destruction.

Reply to CS Pref. Options 2008 & HAAP Issues/Options 2009

Policy T3, CLT1 Appendix CLT1 Public transport RDC admits this is in the private sector. In Hockley, operator has cut No7 service to 1 per hour from Ashingdon Schools, claiming it is unviable beyond. This is unlikely to change as Hockley is car dependant. No8 bus through Hawkwell is cut to 1 per hour to Rayleigh, for same reason as No7. Proposed planning agreements with developers can't run: eg, a community centre or classroom given by a developer remains once he has moved on - how can that apply for an on-going bus service?

Reply to Infrastructure Transport in CS Pref. Opts. 2008 and to HAAP Issues Opts. 2009.

Ch.11 Economic development

Policy ED3 Core Strategy preferred Options 2008 hinted at possible housing in Eldon Way site. June 2009 Submission version, without consultation, said Eldon Way would be housing (map included Foundry, not the text). September 2009 Submission said redevelopment would be in HAAP (which apart from the Issues/Options version, is unfinished. Judging from results of JAAP Preferred Options where biggest option is chosen, though most respondents were against it, site will be housing, without consultation.

16719 Object

CHAPTER 1 1.25

Para.1.25, Para.11.32 Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to accommodate employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

Reply to HAAP Issues Options 2009

Remove compulsory relocation

Policy ED4 Policy states Council will allocate 18ha of land to make up for de-allocations in ED3 - that proves point above.

Proposals for moving employment to out of town locations with no existing transport links are contrary to government policies PPG4, PPS1 and PPS4 and Core Strategy Policy T1.

Evidence Base is ignored by contravening Hockley Parish Plan 2007 and ignoring residents' views on HAAP Issues/Options. Next stage of HAAP Preferred Options is pre-empted and rendered irrelevant. Core Strategy plans to relocate Eldon Way Foundry estate to Greenfield site with no nearby bus or railway. RDC plans to upgrade the nearest road to dual carriageway, though the connecting B1013 (through Hockley) will stay single, said by ECC Highways statistics to be 72% capacity. Airport bosses and council cannot suggest there will be no traffic growth from JAAP and new industrial site.

Reply to Hockley Parish Plan 2007. HAAP Issues 2009

Move to new industrial site near airport contravenes PPS4:

- EC7.3C "out of centre sites, with preference given to sites...well served by choice of...transport and...close to centre and...high likelihood of forming links with centre". There is no current public transport and links with centres is unlikely".

- EC 7.5.1 "whether the site is or will be accessible and well served by choice of transport, public transport, walking and cycling, as well as by car...". Remote location, narrow busy B1013 makes the site unsuitable for access by cycle or on foot.

It also contravenes PPS1 (27vii)... "reduce need to travel, encourage accessible public transport provision to secure more sustainable patterns of transport...Planning should actively manage patterns of urban growth to make fullest use of public transport and focus development in existing centres, near to major public transport interchanges". Core Strategy undermines its own policy Transport and Highways policy T1 and is unsound.

Although shown on accompanying drawing in earlier versions, there was no prior textual mention of Foundry industrial estate (next to Eldon Way) for redevelopment until current CS 2009 Submission. This was stated to be a typing error, but does not inspire confidence in reliability of drafting.

Revise both 2009 Core Strategy and 2009 HAAP Issues/options

Chapter 12: Retail/Town centres

The Core Strategy misrepresents findings of the Retail and Leisure Study 2008.

Para.12.38 The Core Strategy states (para.12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace."

Whereas the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure".

2) (10.28) "There is no immediate capacity for additional floorspace".

3) (10.29) "we recommend focus be maintained on developing Hockley's existing strengths, rather than retail expansion"

4) 10.31 "the current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it has a very small catchment population. Accordingly, the council may wish to consider reclassifying Hockley from a town centre to a district centre".

Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

The Council will work with landowners and its partners to deliver the HAAP.

Remove threat of compulsory purchase orders.

Core Strategy Submission Document

O - 16719 - 7834 - 1.25 - i

16719 Object

CHAPTER 1 1.25

One doesn't perceive impartiality when the Planning Director replies to local HAAP survey with "The affluent people of Hockley are entitled to famous name shops".

Chapter 5: Character of Place and Local Lists

Para.5.4 "Rochford district has unique character..stems from traditional buildings..still dominate towns and villages".

Para.5.17 "Council believes many buildings..are of local distinctiveness..part of..cherished local scene".

This only applies to favoured places: Rochford, Rayleigh, greenbelt villages. Many Hockley conservable items have been systemically removed for supposedly lucrative development in face of widespread protect. This is for supposed need for housing. In fact heritage items have been replaced by dwellings most cannot afford, and/or are hard to sell due to unsuitability of massing and siting. Many other homes are jeopardised by this practice.

HAAP issues 2009. Core Strategy 2006, 2007,2008, SCI.2006

Fewer 'vested interests', more even handedness. No more pressing people out of businesses, homes for expediency.

A CPRE Fieldwork issue extolled Local Lists, citing refusal of 16 flats to replace character house, not on local list. Inspector said house, facade made a contribution to area character, even if English heritage decided it didn't warrant listing. Council worked to get the house grade listed and even made adjacent area conservation one.

Hockley had one such on a "significant site" faced with 13 flats. Ward Member omitted house from refusal proposal, so house could be demolished. RDC dropped Local List ahead of appeal: "Government frowned on such Lists" (Other LAs, unaware of supposed directive retained theirs. After demolition RDC restored Local Lists, saying Government now support them. When Inspector queried the complaint, the then policy officer said "just politics, lot of local interest, nothing of character in the area[!]. (A dozen such items had been removed). Some "distinctive" Hockley buildings are still condemned (in Greensward Lane.; others threatened (Spa Road). Whereas a modest hue and cry in Rayleigh will usually result in a building being saved.

Conclusion

Core Strategy Submission DPD is basically unsound in many respects

Incomplete information. Amongst others, it refers to Hockley AAP, the first stage of which is complete, but not other three. Rochford AAP first stage has been published in arrears of Core Strategy Submission. Rayleigh AAP is still awaited. Precise housing sites are absent, as Urban Capacity Study 2007 has been superseded by Strategic Housing Land Availability Assessment, not yet published. Traders, residents, are thus responding to Core Strategy Submission with incomplete information.

Lack of community involvement. Chapter 1, Introduction, para. 1.11 "Community involvement is an essential part of the plan making process".

In Statement of Community Involvement 2006 Rochford RDC "recognises need to enable people to have their voices heard".

Re Public Meetings: "Consideration will be had to timing and venue to ensure meeting is as accessible as possible".

Take Hockley Area Action Plan as an example of the opposite of all this:- Presentation of document was at Hullbridge, 7.30pm. It was also discussed with JAAP at Rochford Freight House (for traders only) at 7am, without publicity. Excuse made: HAAP on RDC website, which none will seek unless knowing it is there. Rochford District Matters newsheet had minute articles on p.3, half way through consultation period. Another excuse: a 2nd presentation by Hockley Residents Association with planning officer present: only because of complaints, and it is not the HRA's responsibility to RDC's job. Due to unavoidable haste of calling meeting, few knew and only 50 were present.

In Core Strategy Submission Hockley Parish Plan has been ignored. Proposals also ignore 95% rejection rate response to HAAP 2009, which included proposals for Eldon Way employment site.

Unfettered right of developers to carry on as if Core Strategy didn't exist. In PPS 12, Ch.4.6 states: "Core Strategies should be flexible and able to show how they handle contingencies". Several large planning applications have been submitted proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS 12.

Where are we? Finally, at Chapter 1, Introduction, para. 1.24: "the Core Strategy will have to be reviewed in the event of a new Local Area Agreement, post-2011, setting different priorities". So what purpose does all this work serve? So we have hardly finished this exercise, before it all starts again?

Summary:

Para.1.25, Para.11.32 Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to

Core Strategy Submission Document

O - 16719 - 7834 - 1.25 - i

16719 Object

CHAPTER 1 1.25

accommodated employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

Change to Plan Remove compulsory relocation

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16753 - 14229 - 1.25 - i, iii

16753 Object

CHAPTER 1 1.25

Respondent: Hockley Under Threat (J Abbey) [14229]

Hockley Under Threat
None provided

Agent: N/A

Full Text:

Ch. 4 Housing; Ch.10 Transport, Highways; Ch.11 Economic Development; Ch.12 Retail/town centres; Ch.5 Character of place & Local Lists

Chapter 4: Housing

Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1, Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2

N.E.Hockley was discarded as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley...along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

Need to be logical and even-handed in proposals

June 2009 issue C S Submission issue says Eldon Way will be used for housing, whereas Sept.2009 issue says "alternative uses, including residential.." to be decided by HAAP (Issues consultation done, Pref.Options issue awaited, but judging from JAAP Pref.Options decision - namely biggest option chosen against overriding opposition, it will be housing).

Policy H1, T1 Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG14 & PPS1. it also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths",

The Core Strategy also contravenes its own policy T1 and is unsound.

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

Establish like motorways with wholesale demolition.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts.

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Para.10.5

Policy T3, CLT1 Appendix CLT1

T1 & T2 "...highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which

16753 Object

CHAPTER 1 1.25

cannot be altered without much destruction.

Public transport RDC admits this is in the private sector. In Hockley, operator has cut No 7 service to one per hour from Ashingdon Schools, claiming it is unviable beyond. This is unlikely to change as Hockley is car dependant. No 8 bus through Hawkwell is cut to one per hour to Rayleigh, for same reason as No 7. Proposed planning agreements with developers can't run: e.g., a community centre or classroom given by a developer remains once he has moved on - how can that apply for an on-going bus service?

Ch.11 Economic development

Policy ED3 Core Strategy preferred Options 2008 hinted at possible housing in Eldon Way site. June 2009 Submission version, without consultation, said Eldon Way would be housing (map included Foundry, not the text). September 2009 Submission said redevelopment would be in HAAP (which apart from the Issues/Options version, is unfinished. Judging from results of JAAP Preferred Options where biggest option is chosen, though most respondents were against it, site will be housing, without consultation.

Para.1.25 Para.11.32

Policy ED4 T1 & T2 Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to accommodated employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

Remove compulsory relocation

Policy states Council will allocate 18ha of land to make up for de-allocations in ED3 - that proves point above.

Proposals for moving employment to out of town locations with no existing transport links are contrary to government policies PPG4, PPS1 and PPS4 and Core Strategy Policy T1.

Evidence Base is ignored by contravening Hockley Parish Plan 2007 and ignoring residents' views on HAAP Issues/Options. Next stage of HAAP Preferred Options is pre-empted and rendered irrelevant.

Core Strategy plans to relocate Eldon Way Foundry estate to Greenfield site with no nearby bus or railway. RDC plans to upgrade the nearest road to dual carriageway, though the connecting B1013 (through Hockley) will stay single, said by ECC Highways statistics to be 72% capacity. Airport bosses and council cannot suggest there will be no traffic growth from JAAP and new industrial site.

Revise both 2009 Core Strategy and 2009 HAAP Issues/options

Move to new industrial site near airport contravenes PPS4:

EC7.3C "out of centre sites, with preference given to sites..well served by choice of..transport and..close to centre and..high likelihood of forming links with centre". There is no current public transport and links with centres is unlikely".

EC 7.5.1 "whether the site is or will be accessible and well served by choice of transport, public transport, walking and cycling, as well as by car..". Remote location, narrow busy B1013 makes the site unsuitable for access by cycle or on foot.

It also contravenes PPS1 (27vii).. "reduce need to travel, encourage accessible public transport provision to secure more sustainable patterns of transport..Planning should actively manage patterns of urban growth to make fullest use of public transport and focus development in existing centres, near to major public transport interchanges". Core Strategy undermines its own policy Transport and Highways policy T1 and is unsound.

H1 & RTC6 Although shown on accompanying drawing in earlier versions, there was no prior textual mention of Foundry industrial estate (next to Eldon Way) for redevelopment until current CS 2009 Submission. In recent amendment to the CS this was stated to be due to a typing error!

Chapter 12: Retail/Town centres

The Core Strategy misrepresents findings of the Retail and Leisure Study 2008.

Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

Para.12.38 H1 & RTC6 The Core Strategy states (para.12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace."

Whereas the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food

Core Strategy Submission Document

O - 16753 - 14229 - 1.25 - i, iii

16753 Object

CHAPTER 1 1.25

shopping expenditure".

2) (10.28) "There is no immediate capacity for additional floorspace".

3) (10.29) "we recommend focus be maintained on developing Hockley's existing strengths, rather than retail expansion"

4) 10.31 "the current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it has a very small catchment population. Accordingly, the council may wish to consider reclassifying Hockley from a town centre to a district centre".

Remove threat of compulsory purchase orders.

The Council will work with landowners and its partners to deliver the HAAP.

Chapter 5: Character of Place and Local Lists

Para.5.4 "Rochford district has unique character..stems from traditional buildings..still dominate towns and villages".

Para.5.17 "Council believes many buildings..are of local distinctiveness..part of..cherished local scene".

This only appears to apply to certain places: Rochford, Rayleigh, greenbelt villages. Many Hockley conservable items have been systemically removed for supposedly lucrative development in face of widespread protect. This is for supposed need for housing. In fact heritage items have been replaced by dwellings most cannot afford, and/or are hard to sell due to unsuitability of massing and siting. Many other homes are jeopardised by this practice.

Conclusion

Core Strategy Submission DPD is basically unsound in many respects:

Incomplete information. Amongst others, it refers to Hockley AAP, the first stage of which is complete, but not other three. Rochford AAP first stage has been published in arrears of Core Strategy Submission. Rayleigh AAP is still awaited. Precise housing sites are absent, as Urban Capacity Study 2007 has been superseded by Strategic Housing Land Availability Assessment, not yet published. Traders, residents, are thus responding to Core Strategy Submission with incomplete information.

Lack of community involvement. Chapter 1, Introduction, para. 1.11 "Community involvement is an essential part of the plan making process". In Statement of Community Involvement 2006 Rochford RDC "recognises need to enable people..to have their voices heard".

Re Public Meetings: "Consideration will be had to timing and venue to ensure meeting is as accessible as possible".

Hockley Area Action Plan as an example of the opposite of all this:- Presentation of document was at Hullbridge, 7.30 p.m. It was also discussed with JAAP at Rochford Freight House (for traders only) at 7 a.m., without publicity. Excuse made: HAAP on RDC website, which none will seek unless knowing it is there. Rochford District Matters newssheet had minute articles on p.3, half way through consultation period. Another excuse: a second presentation by Hockley Residents Association with planning officer present: only because of complaints, and it is not the HRA's responsibility to RDC's job. Due to unavoidable haste of calling meeting, few knew and only 50 were present.

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Where are we? Finally, at Chapter 1, Introduction, para. 1.24: "the Core Strategy will have to be reviewed in the event of a new Local Area Agreement, post-2011, setting different priorities". So what purpose does all this work serve? So we have hardly finished this exercise, before it all starts again?

Summary:

Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to accommodated employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

Change to Plan

Remove compulsory relocation

Appear at exam?

Not Specified

Soundness Tests

i, iii

Core Strategy Submission Document

O - 15783 - 8435 - 1.29 - i, ii, iii

15783 Object

CHAPTER 1 1.29

Respondent: Mr Andrew Allen [8435]

36 connaught road,
Rayleigh
ss68ux
uk

Agent: N/A

Full Text: It is not true that all evidence has been considered. Sites which have been submitted have not been fully considered. My site was only visited AFTER the report had been published and has still not been added to RDC's website as a submitted site! No feedback on the suitability of my site has been provided. Where is the proof that all evidence has been considered? If there is no proof then this report is unsound and the process employed in constructing this report is open to legal challenge.

If there is proof then why hasn't it been published!

Summary: It is not true that all evidence has been considered. Sites which have been submitted have not been fully considered. My site was only visited AFTER the report had been published and has still not been added to RDC's website as a submitted site! No feedback on the suitability of my site has been provided. Where is the proof that all evidence has been considered? If there is no proof then this report is unsound and the process employed in constructing this report is open to legal challenge.

If there is proof then why hasn't it been published!

Change to Plan Provide the evidence and proof of RDC dilligence to enable proper public scrutiny.

Appear at exam? Yes

Soundness Tests i, ii, iii

Core Strategy Submission Document

S - 15964 - 13441 - 1.29 - None

15964 Support

CHAPTER 1 1.29

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: The evidence base is comprehensive. The SEA and its summary document, prepared by Enfusion, are available through the website. The SHLAA, although listed as evidence, does not appear to be publicly available.

Summary: The evidence base is comprehensive. The SEA and its summary document, prepared by Enfusion, are available through the website. The SHLAA, although listed as evidence, does not appear to be publicly available.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16832 - 9912 - 1.29 - i, ii, iii

16832 Object

CHAPTER 1 1.29

Respondent: M D Smith & Son [9912]

M D Smith & Son
Hambro Nurseries
Chelmsford Road
Battlesbridge
Wickford
SS11 8SY

Agent: Andrew Martin Associates Ltd (Mr David Maxwell)
[9911]

Andrew Martin Associates Ltd
Croxtan's Mill
Little Waltham
Chelmsford
Essex
CM3 3PJ
01245 361611

Full Text: The Core Strategy is unsound as it has not been justified through an effective Strategic Housing Land Availability Assessment (SHLAA). The Council published a list of sites considered through the SHLAA approximately one week before the deadline for submissions towards the Proposed Submission Core Strategy on Monday 2nd November 2009. However, no supporting text or explanation of the sites listed by the SHLAA was provided. The Core Strategy has therefore been prepared without any provision for interested parties to properly review and comment on the contents, recommendations and conclusions made within the SHLAA. The Council has produced a Core Strategy Development Plan Document in an inappropriate, ineffective and unjustified manner. Central government encourages consultation at the earliest possible stage in the plan making process.

The Core Strategy Proposed Submission Document should be made available for a further six week period and notices should be published to inform all interested parties that the SHLAA has been now been completed and forms a key part of the Evidence Base to the Core Strategy.

Supporting document supplied Council ref AE23

Summary: The Core Strategy is unsound as it has not been justified through an effective Strategic Housing Land Availability Assessment (SHLAA). The Council published a list of sites considered through the SHLAA approximately one week before the deadline for submissions towards the Proposed Submission Core Strategy on Monday 2nd November 2009. However, no supporting text or explanation of the sites listed by the SHLAA was provided. The Core Strategy has therefore been prepared without any provision for interested parties to properly review and comment on the contents, recommendations and conclusions made within the SHLAA. The Council has produced a Core Strategy Development Plan Document in an inappropriate, ineffective and unjustified manner. Central government encourages consultation at the earliest possible stage in the plan making process.

Supporting document supplied Council ref AE23

Change to Plan The Core Strategy Proposed Submission Document should be made available for a further six week period and notices should be published to inform all interested parties that the SHLAA has been now been completed and forms a key part of the Evidence Base to the Core Strategy.

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 15868 - 12083 - Spatial Characteristics, Issues and Opportunities - i, ii

15868 Object

CHAPTER 2 Spatial Characteristics, Issues and Opportunities

Respondent: Mr Paul Sealey [12083]

Agent: N/A

Kirrin,
Hockley Rise,
Hockley
SS5 4PT
United Kingdom
01702206888

Full Text: There is no indication of alternative strategies that have been considered and rejected or alternatives that might be brought into play if circumstances change. There are a lot of fairly large assumptions (and therefore risks) that could impact delivery, not least the inputs required from other organisations. However, there is no real consideration of how they might be dealt with. Relying on periodic reviews of the strategy and 'working with partners' is not enough.

Summary: There is no indication of alternative strategies that have been considered and rejected or alternatives that might be brought into play if circumstances change. There are a lot of fairly large assumptions (and therefore risks) that could impact delivery, not least the inputs required from other organisations. However, there is no real consideration of how they might be dealt with. Relying on periodic reviews of the strategy and 'working with partners' is not enough.

Change to Plan Review all the major assumptions surrounding this strategy and come up with an effective risk management plan

Appear at exam? No **Soundness Tests** i, ii

Core Strategy Submission Document

S - 16032 - 14107 - 2.16 - None

16032 Support

CHAPTER 2 2.16

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: Do we have sufficient water supplies for the proposed developments? The East of England Plan, Essex Thames Gateway Sub Area Profile - Water/Page 16 Para 4.70 states that they have concerns about a water deficit

Summary: Do we have sufficient water supplies for the proposed developments? The East of England Plan, Essex Thames Gateway Sub Area Profile - Water/Page 16 Para 4.70 states that they have concerns about a water deficit

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16033 - 14107 - 2.24 - None

16033 Support

CHAPTER 2 2.24

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: This is going to be a problem for Rochford District in the future years and needs careful consideration

Summary: This is going to be a problem for Rochford District in the future years and needs careful consideration

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16034 - 14107 - 2.40 - None

16034 Support

CHAPTER 2 2.40

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: With particular emphasis on Highways. We are already exceeding capacity in some areas. East of England Plan refers to A127 and A13 which are major routes to and from Rochford. (Essex Thames Gateway Sub area Profile - Transport/Para 4.57 and 4.58).
How can we reasonably expect to accommodate proposed development outlined in the strategy without guaranteed major improvements to the infrastructure.

Summary: With particular emphasis on Highways. We are already exceeding capacity in some areas. East of England Plan refers to A127 and A13 which are major routes to and from Rochford. (Essex Thames Gateway Sub area Profile - Transport/Para 4.57 and 4.58).
How can we reasonably expect to accommodate proposed development outlined in the strategy without guaranteed major improvements to the infrastructure.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16035 - 14107 - 2.50 - None

16035 Support

CHAPTER 2 2.50

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: This is in decline and efforts need to be made to support this section of the business community. Influence needs to be brought to bear to encourage manufacturing to the district.

Summary: This is in decline and efforts need to be made to support this section of the business community. Influence needs to be brought to bear to encourage manufacturing to the district.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 15965 - 13441 - 2.54 - None

15965 Support

CHAPTER 2 2.54

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: The role of Southend Airport is expressed more clearly. It conforms with the East of England Plan.

Summary: The role of Southend Airport is expressed more clearly. It conforms with the East of England Plan.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16189 - 14107 - 2.58 - None

16189 Support

CHAPTER 2 2.58

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: Please refer to the East of England Plan Essex Thames Gateway Sub-Area, Part 2, Transport Section, Items 4.57 and 4.58

The district needs to work with Southend Borough Council to assist in the east/west traffic flows, as the district is in need of a relief road, linking the A130 with East Southend and Shoeburyness and this could possibly be achieved with a new road running to the north of the district.

Summary: Please refer to the East of England Plan Essex Thames Gateway Sub-Area, Part 2, Transport Section, Items 4.57 and 4.58

The district needs to work with Southend Borough Council to assist in the east/west traffic flows, as the district is in need of a relief road, linking the A130 with East Southend and Shoeburyness and this could possibly be achieved with a new road running to the north of the district.

Change to Plan N/A

Appear at exam? Not Specified

Soundness Tests N/A

Core Strategy Submission Document

S - 16191 - 8119 - 2.58 - None

16191 Support

CHAPTER 2 2.58

Respondent: Baltic Distribution Limited (Mr Robert Croshaw) **Agent:** N/A
[8119]

Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
Essex
SS4 2HA
England
01702 258551

Full Text: Please refer to the East of England Plan Essex Thames Gateway Sub-Area Part 2, Transport Section, Items 4.57 and 4.58

In the longer term, the district needs improved access and also assistance to improve the east/west traffic flows to Southend and Shoeburyness and, in this respect, may be an arterial road to link Shoeburyness to the new A130 running to the north of the district would be a solution.

Summary: Please refer to the East of England Plan Essex Thames Gateway Sub-Area Part 2, Transport Section, Items 4.57 and 4.58

In the longer term, the district needs improved access and also assistance to improve the east/west traffic flows to Southend and Shoeburyness and, in this respect, may be an arterial road to link Shoeburyness to the new A130 running to the north of the district would be a solution.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16037 - 14107 - 2.61 - None

16037 Support

CHAPTER 2 2.61

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: Car dependency is high. What action will be taken to improve alternatives?

Summary: Car dependency is high. What action will be taken to improve alternatives?

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 15862 - 12083 - 2.62 - i, ii

15862 Object

CHAPTER 2 2.62

Respondent: Mr Paul Sealey [12083]

Agent: N/A

Kirrin,
Hockley Rise,
Hockley
SS5 4PT
United Kingdom
01702206888

Full Text: The Issues and options consultation identified the possible option for a ring road around the area to resolve the potential congestion. There is no indication that this has been given serious consideration. Nor are there any other proposals to effectively resolve the problems. If this problem isn't addressed it could significantly impact the delivery of the strategy.

Summary: The Issues and options consultation identified the possible option for a ring road around the area to resolve the potential congestion. There is no indication that this has been given serious consideration. Nor are there any other proposals to effectively resolve the problems. If this problem isn't addressed it could significantly impact the delivery of the strategy.

Change to Plan Work with partner organisations to find realistic solutions to the potential congestion arising from this plan.

Appear at exam? No **Soundness Tests** i, ii

16249 Object

CHAPTER 2 2.62

Respondent: Colonnade Land LLP [9177]

Colonnade Land LLP
Fifth Floor
17-19 Maddox Street
London
W15 2QH
020 7255 7490

Agent: Icen Projects Limited (David Churchill) [10057]

Icen Projects Limited
83 Victoria Street
London
SJ1H 0HW

Full Text: ROCHFORD DISTRICT COUNCIL - LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY SUBMISSION
SEPTEMBER 2009

Icen Projects Ltd (Icen) has been instructed by Colonnade Land LLP (Colonnade) to submit representations to the Rochford Local Development Framework Core Strategy Submission (CSS).

a) Overview

It is our conclusion that the CSS is not justified, effective or consistent with national policy, as required by Planning Policy Statement 12: Creating Strong Safe and Prosperous Communities through Local Spatial Planning (PPS12) and is therefore vulnerable to being found unsound by an Inspector through the Examination in Public.

b) Background and Summary

These representations follow those made by Icen on behalf of Colonnade to the Preferred Options Core Strategy, submitted via letter dated 17 December 2008. In this regard, we would request that the Council confirms that the representations made to the Preferred Options Core Strategy will be taken into account alongside the current representations, particularly as there are a number of cross references between the two sets of representations.

It is not considered necessary to reiterate the content of the previous representations, as they were made at the appropriate stage and will be considered by the Planning Inspectorate in due course, but it is inevitable that certain elements will require restating where it is not clear that they have been taken into account in the production of the CSS. For clarity, therefore, Colonnade feel that it is appropriate to clarify the 'in-principle' issues that were raised in the representations to the Preferred Options Core Strategy, recognising that these issues were raised in the context of a wider and more coherent justification made within the representations:

- â€¢ Further cross-referencing of the recommendations made within the evidence base is required;
- â€¢ Greater focus should be placed on promoting Rochford as the principal settlement within the District;
- â€¢ Coombes Farm is the most logical location for residential development abutting the urban area of Rochford and as such warrants recognition as a general location for residential development;
- â€¢ The allocation of Three Ashes Farm for employment generating uses will be pursued;
- â€¢ Recognition that it is not realistic to expect residential allocations to be met mainly on Brownfield sites, nor should the intensification of smaller sites in residential areas be pursued;
- â€¢ Many of the sites identified as suitable for residential development will not be viable and will not come forward for development within the timescales anticipated;
- â€¢ The failure to provide the necessary justification for the proposed infrastructure improvements sought in Appendix H1;
- â€¢ The inclusion of an affordable housing exception policy was sought; and
- â€¢ The need to identify sites capable of delivering employment growth in the short term.

Following assessment of the CSS presented by the Council for consultation prior to submission to the Secretary of State, Colonnade considers the Plan to be 'unsound' as the document consistently fails to meet the tests of soundness set out in the table following Paragraph 4.52 of PPS12. For clarity, PPS12 confirms that to be 'sound' a Core Strategy should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY and defines 'justified' as "founded on a robust and credible evidence base" and "the most appropriate strategy when considered against the reasonable alternatives" and 'effective' as "deliverable", "flexible" and "able to be monitored".

The rationale for the above is identified in the remainder of these representations, which are provided in the interests of ensuring the Council delivers a strong, robust and logical Core Strategy that guides the future development of the District in a justified and effective manner.

b) Colonnade

As the Council is aware from previous submissions to the Local Development Framework, Colonnade is a strategic land company with a particular interest in the future development of the District as a consequence of a number of sites that it controls, particularly around Rochford.

The Council will also be aware that Colonnade has recently submitted an outline planning application for the residential development of the land at Coombes Farm, Rochford to provide a sustainable urban extension comprising up to 326

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residential dwellings, with associated accesses and community uses. Whilst the planning application process is clearly separate from the Local Development Framework production process, Colonnade wishes to continue the promotion of the site as a suitable location for residential development.

Accordingly, these representations focus on the legal requirements and tests of soundness associated principally with the Housing and Employment chapters of the CSS, with reference where appropriate to the sites that are controlled by Colonnade, the outline planning application at Coombes Farm and other issues where relevant.

c) Housing

i. Date of Adoption

The CSS assumes an adoption date of 2010 and plans for the provision of housing to 2025.

Taking account of the potential delays to the adoption of the Plan, including the Examination process, it would be more appropriate for the CSS to provide sufficient flexibility to allow for delays in its adoption. Colonnade considers an adoption date of 2011 for the CSS is a more realistic target.

Taking account of the advice in Paragraph 4.13 of PPS12, which states that the time horizon for the Core Strategy should be "at least 15 years from the date of adoption" it would be appropriate for the CSS to plan for the provision of housing to 2026 at the earliest. As such, Colonnade does not consider the CSS to be 'flexible' in the context of the tests of soundness in the table following Paragraph 4.52 of PPS12.

ii. Housing Delivery

However, setting the above aside, the Housing Chapter identifies the minimum housing delivery target for the period 2001 to 2021 of 4,600 dwellings as set out in the East of England Plan, with the annual average requirement of 250 dwellings per annum to extend provision from 2021 to 2025. It also confirms that the residual target for the period 2006 to 2021 is 3,790 dwellings, taking account of the delivery of 810 dwellings in the period 2001 to 2006, and a further 618 dwellings have been completed between 2006 and 2008.

This leaves a residual housing provision target of a minimum of 3,172 dwellings in the period 2008 to 2021. Taking into account the required provision beyond 2021, the residual housing provision target in the period 2008 to 2025 is a minimum of 4,172 dwellings. The disparity between these figures and those provided within the CSS are explained by the rounding down of the annual average delivery requirement in the period 2006 to 2021 to 250 dwellings per annum, compared with the actual figure of 252.67.

The table at Paragraph 4.6 of the CSS identifies the source of housing provision that will meet the identified minimum requirements and includes figures for 'Extant Planning Permissions' and 'Existing allocations/other appropriate sites identified in Strategic Housing Land Availability Assessment'. These figures, along with the actual completions within the period are combined to produce the figure for the 'Total without Green Belt release' figure.

Setting aside the concern regarding under-provision associated with the rounding down of the annual average delivery requirement in the period 2006 to 2021, the CSS fails to identify the sites that will contribute to the 'Extant Planning Permissions' provision. The identification of the sites that will contribute to the 'Extant Planning Permissions' should be provided in the context of the findings of the Inspector in the appeal by Asprey Homes [APP/G5180/A/07/2043219/NWF] who determined that the reliance on a delivery rate of 100% is unsafe [IR287].

Furthermore, at the time of writing these representations, the Strategic Housing Land Availability Assessment 2009 has not been published. It is impossible therefore for a full assessment of the proposed housing provision to be undertaken to confirm whether the CSS is 'founded on a robust and credible evidence base' [test of soundness in the table following Paragraph 4.52 of PPS12].

iii. Redevelopment of Employment Sites

Paragraph 4.14 of the CSS refers to the identification of the four employment sites that are considered by the Council to be suitable for redevelopment to residential use. However, the failure to publish the Strategic Housing Land Availability Assessment 2009 either before or alongside the publication of the CSS means that the assumptions made by the Council as to the suitability, availability, viability and deliverability of the sites cannot be assessed.

It has been necessary, therefore, to review the assumptions made in the Rochford Urban Capacity Study 2007 (UCS) regarding the sites. Within the section of the UCS entitled 'Redevelopment of Established Employment Land' [pages 22 & 23] includes a list of those sites assessed, their indicative capacities and the probability of residential development coming forward at the sites within the plan period (identified elsewhere as 2001 - 2021). The list includes the four sites identified in the CSS of Eldon Way/Foundry Estate, Hockley; Rawreth Lane Industrial Estate, Rayleigh; Stambridge Mills; and Star Lane Industrial Estate, Great Wakering.

In total, the UCS identifies an indicative residential redevelopment capacity of 486 units on the four sites (118, 220, 60 and 88 respectively). Of these, it identifies the Rawreth Lane Industrial Estate and Stambridge Mills as having a 'high'

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probability of coming forward for development in the Plan period (2001 - 2021), which would deliver 280 residential dwellings using the Council's own figures. The Star Lane Industrial Estate (referred to in the UCS as the Star Lane Brickworks) is identified as having a 'medium' probability of coming forward for development in the Plan period, with capacity to deliver 88 residential dwellings. It is unclear, therefore, where the figure for 'Existing allocations/other appropriate sites identified in Strategic Housing Land Availability Assessment'.

Set against this is the identification of these four sites in the CSS as being capable of delivery for residential development within the Plan period, with 671 units delivered between 2006 and 2015 and a further 506 units between 2015 and 2021.

The UCS also states in the same section that:

"There are considerable areas of land in the district that are currently allocated for, and in use as, employment land. The redevelopment of such sites for residential use would reduce demand for residential development on greenfield sites, but would at the same time create a need for alternative sites to be found for employment. Such an approach, which would be likely to require the decontamination of existing employment land to make it fit for residential use, together with development of a greenfield site and implementation of additional infrastructure to serve the new employment area, may well be unsustainable." [our emphasis]

The UCS appears to confirm therefore, that not only would the redevelopment of the four sites listed in the CSS be unlikely within the Plan period, but also potentially unsustainable. In this regard, it is notable that the promoters of Stambidge Mills sought the Screening Opinion of the Council as to whether Environmental Impact Assessment of the planning application for the redevelopment of the site for residential use was required in 2007, but to date are yet to submit a planning application for the redevelopment of the site.

In light of this, Colonnade does not consider the CSS is 'the most appropriate strategy when considered against the reasonable alternatives' [test of soundness in the table following Paragraph 4.52 of PPS12], which include the provision of residential development in East Rochford.

iv. Strategic Housing Growth to the East of Rochford

Furthermore, whilst paragraph 2.62 of the CSS identifies concern relating to the identification of locations to the east of Rochford for development on the basis that 'vehicular movements would inevitably be directed through Rochford's historic core', the CSS later identifies Stambidge Mills as a suitable site for residential redevelopment.

In light of the evident conflicts between the evidence base provided in support of the CSS and the absence of other evidence, the CSS is not considered 'sound' in the context of the tests of soundness in the table following Paragraph 4.52 of PPS12.

v. Housing Trajectory

Paragraph 4.28 of the CSS confirms that policies H1, H2 and H3 of the CSS will deliver housing supply as illustrated in the Housing Trajectory at Appendix H2. This Housing Trajectory is transposed from the 2008 Annual Monitoring Report (AMR).

Whilst on the face of it, the Housing Trajectory appears to confirm that the Council can meet its requirement to identify a five year housing supply, many of the sites identified within the AMR do not conform to the guidance issued by CLG in August 2008, on the assessment of a five year land supply. The guidance identifies sites that can be included within the five year assessment of housing supply as:

"those that are allocated for housing in the Development Plan, sites that have planning permission (outline or full planning permission that has not been implemented) and specific, unallocated brownfield sites that have the potential to make a significant contribution to housing delivery during the 5 year period".

Table 4.10: Projected Net Completions of the AMR confirms that the five year housing land supply figure includes sites from 'other land allocated for residential purposes', which are based on land allocations outside existing settlements. However, it should be clarified that these land allocations are not currently allocated for housing development in an adopted Development Plan. As such, these unallocated greenfield sites that are yet to make significant progress through the planning system should be discounted and the five year housing land supply recalculated.

The table below has been prepared to confirm the extent of the shortfall should the sites from 'other land allocated for residential purposes' be removed from the calculation of the Rochford five year housing land supply, in accordance with the guidance issued by CLG:

Recalculated Five Year Housing Land Supply (2009 - 2014):

Year
1st April 2009 to 31st March 2010
Predicted Delivery (A)

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106 dwellings
Allocations on 'other land allocated for residential purposes' (B)
0
Residual delivery (A-B)
106 dwellings
Delivery Shortfall
0

Year
1st April 2010 to 31st March 2011
Predicted Delivery (A)
217 dwellings
Allocations on 'other land allocated for residential purposes' (B)
150
Residual delivery (A-B)
67 dwellings
Delivery Shortfall
150

Year
1st April 2011 to 31st March 2012
Predicted Delivery (A)
544 dwellings
Allocations on 'other land allocated for residential purposes' (B)
300
Residual delivery (A-B)
244 dwellings
Delivery Shortfall
300

Year
1st April 2012 to 31st March 2013
Predicted Delivery (A)
395 dwellings
Allocations on 'other land allocated for residential purposes' (B)
375
Residual delivery (A-B)
20 dwellings
Delivery Shortfall
375

Year
1st April 2013 to 31st March 2014
Predicted Delivery (A)
300 dwellings
Allocations on 'other land allocated for residential purposes' (B)
300
Residual delivery (A-B)
0 dwellings
Delivery Shortfall
300

TOTAL

Predicted Delivery (A)
1,562 dwellings

Allocations on 'other land allocated for residential purposes' (B)
1,125 dwellings

Residual delivery (A-B)
437 dwellings

Delivery Shortfall
1,125 dwellings

The above table confirms that the removal of the 'other land allocated for residential purposes' from the calculation of the Rochford five year housing land supply leaves the Council with a minimum net additional housing delivery of 437 dwellings, which equates to a supply of 1.7 years based on the adjusted annual delivery target of a minimum of 255 net

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additional dwellings per annum. As such, the Council is failing to meet its requirement to demonstrate a five year housing land supply in accordance with PPS3 and the supporting guidance provided by CLG. It is notable that the recent application by David Wilson Homes at Land between Main Road and Rectory Road and Clements Hall Way, Hawkwell identifies an even greater shortfall in the Council's five year housing land supply.

In addition to the above, the AMR does not include a commentary on how deliverability has been assessed against the requirements of paragraph 54 of PPS3.

Furthermore, the guidance from CLG confirms that the windfall sites cannot be relied upon in demonstrating a five year supply unless a Local Planning Authority can demonstrate genuine local circumstances exist to allow this exception. However, the second paragraph of the section entitled 'Housing Trajectory and Five Year Housing Supply' confirms that the estimated completions in the years 2008 to 2013 includes estimated yields through 'intensification' coming forward in future years. With reference to the definition of 'intensification' on page 13 of the AMR, it appears that the 'Housing Trajectory and Five Year Housing Supply' also includes provision for windfall sites. As such, the Council is required to demonstrate the 'genuine local circumstances exist to allow this exception'.

The pressures on delivery and need for additional sites are more acute when it is considered that an average delivery rate of 204 dwellings per annum was achieved during a strong period of housing market growth. In view of the current economic downturn, and significant problems faced within the housing market, the Council should seek to identify appropriate and deliverable sites to meet its regional housing target provision commitments. Suitable sites would include Coombes Farm, which has been positively promoted for development through the LDF process.

It may, therefore, be more appropriate for the Council not merely to allocate sufficient sites to meet the minimum targets set down by the East of England Plan, but to identify a reservoir of land capable of coming forward for development should the sites identified through the CSS and Allocations Development Plan Documents (DPD) fail to come forward for development within the anticipated timescales.

vi. Appendix H1

As set out in the representations to the Preferred Options Core Strategy, there is continuing concern that the list of improvements to infrastructure required in support of residential development as set out in Appendix H1 fails to provide the necessary justification for its inclusion. Whilst the preamble seeks to clarify why the infrastructure is sought, the inclusion of this list should be fully justified, otherwise it is of little value. Furthermore, it would be of benefit to provide further details of the existing community infrastructure provision and capacity within the evidence base.

The failure to provide the necessary justification for its inclusion means that the CSS will not be 'founded on a robust and credible evidence base' [test of soundness in the table following Paragraph 4.52 of PPS12].

d) Character of Place

As set out in the representations to the Preferred Options Core Strategy, Colonnade considers that, with respect to the requirement to produce and adhere to Development Briefs for large residential developments, as set out in Policy CP1, the Council should not seek to impose further demands on developers where existing regulations provide sufficient requirements regarding design. In this instance, Design and Access Statements provide sufficient design guidelines for developments and there is no additional information provided in the policy or supporting text that clearly sets out the justification for this requirement.

e) Green Belt

With reference to the comments regarding the redevelopment of employment sites under the 'Housing' section above and the requirement to allocate sufficient land to meet the minimum housing provision targets as required by the East of England Plan, Colonnade considers that the chapter on Green Belt, and policy GB1 in particular, fails to provide the necessary evidence base that will allow it to be monitored effectively.

It is inherent that the proposed redevelopment of previously developed employment sites for residential use in order to reduce the requirement to allocate previously undeveloped land for residential use will displace these employment uses. In turn, therefore, the separate allocation of previously undeveloped Green Belt to accommodate the compensatory employment provision is required. This is accepted in principle at paragraph 11.11 of the CSS.

Without providing clarification of the anticipated quantum of land required to accommodate the provision of housing and compensatory and new employment land, it is not possible to monitor the performance of policy GB1.

However, using the Council's figures in the table setting out the breakdown of the housing provision figures in Chapter 4 of the CSS (assuming that actual completions and extant permissions are all on previously developed land), setting aside the displacement of employment uses referred to above, approximately 42% of the required minimum housing provision target is capable of being accommodated on previously developed land (2,005 units from a total of 4,750). As such, the Council is required to provide at least 58% of the required minimum housing provision target on the Green Belt (2,745 units from a total of 4,750).

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If these figures are adjusted to take account of the displacement of employment uses (assuming the provision of an equal quantity of land is required to compensate for the employment land that is redeveloped), this figure changes to 17.5% on previously developed land and 82.5% on Green Belt (828 and 3,922 units from a total of 4,750 respectively). Even allowing for the achievement of higher densities of employment on new developments, the figures above are unlikely to change significantly.

Furthermore, the table in Chapter 4 also confirms that no previously developed land will be available for development beyond 2021, or 2015 if account is taken of the displacement of the employment uses.

In light of this, not only does Chapter 6 fail to provide the necessary evidence base that will allow it to be monitored effectively, it is also necessary to consider whether it presents the most appropriate strategy for addressing the required release of Green Belt land to accommodate the defined housing and employment delivery targets to 2025 and beyond as necessary. Colonnade considers a more robust approach that is flexible and capable of being monitored, would be to clearly identify those sites capable of delivery in the short term, which for the avoidance of doubt includes those sites being promoted by Colonnade, with a reservoir of alternative sites set aside for future growth.

As set out in the representations to the Preferred Options Core Strategy, Colonnade considers that the inclusion of an affordable housing exception policy within the CSS will aid the delivery of community housing within rural areas. However, the CSS does not contain such a policy, or adequately address the issue of community housing within rural areas and the CSS is not considered to provide sufficient flexibility to allow for the delivery of essential rural housing.

f) Environmental Issues

Colonnade has concerns regarding the justification for and effectiveness of a number of the policies contained within the Environmental Issues chapter, as follows:

â€¢ Policy ENV1: The Council fails to identify how it will "maintain, restore and enhance" the sites of nature conservation importance that are identified, or how the performance of this policy will be monitored;

â€¢ Policy ENV3: In the context of the advice at paragraph 4.32 of PPS12 regarding the reformulation of national policies, Colonnade does not consider that this policy is required; and

â€¢ Policy ENV9: As set out in the representations to the Preferred Options Core Strategy, Colonnade does not consider that the necessary evidence base has been provided to justify a policy that seeks to go above and beyond the policy targets for the Code for Sustainable Homes as set out by Central Government.

g) Community Infrastructure, Leisure and Tourism

Policy CLT1 refers to the requirement for residential and employment development to contribute to the infrastructure identified in Appendix CLT1 through Standard Charges.

However, whilst the general principle of securing planning obligations through the application of standard charges is broadly accepted, the list of infrastructure requirements set out in Appendix CLT1 is not supported by sufficient evidence base to identify its robustness and credibility. As such, Colonnade does not consider either policy CLT1 or Appendix CLT1 is justified in the context of PPS12.

It is also noted that, despite the clarification sought by Colonnade at the Core Strategy Preferred Options stage, the CSS fails to confirm what information should be contained within Health Impact Assessments, which are required by policy CLT4. Once again, Colonnade requests further clarification of what is involved in the assessment and the expected outputs, which will provide greater clarity and will allow the policy to be monitored.

h) Transport

Policy T8 confirms that the Council will apply minimum parking standards. As set out in the representations to the Preferred Options Core Strategy, the guidance in Planning Policy Guidance Note 13: Transport (PPG13) is clear regarding the imposition of parking standards.

Paragraphs 52-56 of PPG13 confirm that the Local Planning Authorities should apply maximum not minimum parking standards. In order to satisfy the legal requirements set out in PPS12, the policy must reflect PPG13 to promote sustainable transport choices and further provide incentives for developers to locate further residential land closer to local service centres by requiring maximum parking standards for residential developments.

i) Economic Development

As set out in the representations to the Preferred Options Core Strategy, the land at Three Ashes Farm provides an excellent opportunity to deliver employment growth in the short term and may be a suitable site for the 'Eco-Innovation Centre' that is being promoted by the Council. Its identification as a suitable location for strategic employment growth, or the provision of an Eco-Innovation Centre, would accord with the general principles of the policies contained within Chapter 11.

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CHAPTER 2 2.62

The identification of Purdeys Industrial Estate as fit for purpose (in paragraph 11.32 and the Council's 2008 Employment Land Study 2008) and therefore it should be maintained and if possible expanded, is welcomed and Colonnade considers that Three Ashes Farm could deliver this expansion, providing a natural extension to Purdeys Industrial Estate and being strategically located close to the Airport.

Three Ashes would address the negative impacts that the nearby residential area experiences from the existing Industrial Estate by providing a buffer between established uses and the residential area with less intensive employment activities. The highways analysis that has been carried out has suggested that it would not have an adverse impact on roads and congestion. Furthermore, there are very few opportunities for businesses to expand and Three Ashes could provide this opportunity.

j) Conclusions

Following the submission of representations to the Preferred Options Core Strategy, Colonnade is disappointed to note that the CSS fails to take account of the majority of the issues raised in their representations.

In addition, Colonnade considers the plan to be 'unsound' as the document consistently fails to meet the tests of soundness set out in the table following Paragraph 4.52 of PPS12 and respectfully requests that the Council notifies Icen, on behalf of Colonnade, of the future arrangements for the Examination of the Core Strategy. Furthermore, Colonnade wishes to take this opportunity to formally register a request to appear at all stages of the Examination in Public, including the pre-hearing meeting and any planned hearing sessions whereby issues raised in the context of this letter are to be discussed. Please confirm this request, and that the representations made to the Preferred Options Core Strategy will be taken into account alongside the current representations, by way of return to this letter.

Icen Projects, on behalf of Colonnade Land LLP trusts that the Council will find these representations to be constructive and helpful in taking forward the Core Strategy. Should you wish to discuss any aspect of these representations further, please do not hesitate to contact us.

Summary:

iv. Strategic Housing Growth to the East of Rochford

Furthermore, whilst paragraph 2.62 of the CSS identifies concern relating to the identification of locations to the east of Rochford for development on the basis that 'vehicular movements would inevitably be directed through Rochford's historic core', the CSS later identifies Stambridge Mills as a suitable site for residential redevelopment.

In light of the evident conflicts between the evidence base provided in support of the CSS and the absence of other evidence, the CSS is not considered 'sound' in the context of the tests of soundness in the table following Paragraph 4.52 of PPS12.

Change to Plan

Appear at exam? Yes Soundness Tests i

Core Strategy Submission Document

S - 16038 - 14107 - 2.63 - None

16038 Support

CHAPTER 2 2.63

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: Car dependency is high. What action will be taken to improve alternatives?

Summary: Car dependency is high. What action will be taken to improve alternatives?

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16113 - 14160 - 2.73 - i

16113 Object

CHAPTER 2 2.73

Respondent: Cllr Chris Black [14160]

56 Love Lane
Rayleigh
Essex
SS67DX

Agent: N/A

Full Text: The proposals for housing 'land north of London Road' "SW Hullbridge" would severely erode the identity of Rawreth . When added to the proposals for building housing on the Rawreth Industrial estate and SW Hullbridge this would more than double the population of the parish, in the most incoherent way, by building on the periphery. Therefore these proposals are UNSOUND.

Summary: The proposals for housing 'land north of London Road' "SW Hullbridge" would severely erode the identity of Rawreth . When added to the proposals for building housing on the Rawreth Industrial estate and SW Hullbridge this would more than double the population of the parish, in the most incoherent way, by building on the periphery. Therefore these proposals are UNSOUND.

Change to Plan There are other locations, generally brownfield sites, that could be used for housing instead of the 'land north of London Road' that would not be so damaging to community identity.

Appear at exam? Yes

Soundness Tests i

Core Strategy Submission Document

O - 15716 - 10289 - 3.1 - i, ii

15716 Object

CHAPTER 3 3.1

Respondent: Mr Kieran Kelly [10289]

8 Southend Road
Rochford
Essex
SS4 1HE
UK
01702545060

Agent: N/A

Full Text: This vacuous statement is at odds with the Council's continued support for the expansion of Southend Airport despite the serious detrimental impact this will have on the quality of life for all people in the area. Similarly, the only opportunities likely to be created with this vision will be for the numerous property developers engaged to deliver this flawed approach for uncontrolled residential development within the district without any real concern for the availability of supporting infrastructure and services.

Summary: This vacuous statement is at odds with the Council's continued support for the expansion of Southend Airport despite the serious detrimental impact this will have on the quality of life for all people in the area. Similarly, the only opportunities likely to be created with this vision will be for the numerous property developers engaged to deliver this flawed approach for uncontrolled residential development within the district without any real concern for the availability of supporting infrastructure and services.

Change to Plan I would suggest that such cynical platitudes are omitted from the plan on the basis that the Council shows absolutely no interest in delivering the best possible quality of life for all who live, work in the area and are much more interested in pursuing short term commercial interests over residents wellbeing.

Appear at exam? No

Soundness Tests i, ii

Core Strategy Submission Document

O - 16003 - 14146 - 3.1 - i, ii, iii

16003 Object

CHAPTER 3 3.1

Respondent: Mr H Snell [14146]

Greensleeves
57 High Road
Hockley

SS5 4SZ

Agent: Capita Symonds (Mr David Spencer) [14145]

Capita Symonds
Elizabeth House
Walpole Loke
Dereham
Norfolk
NR19 1EE
England
01362656889

Full Text: The document lacks a coherent and comprehensive Spatial Vision and set of objectives for the District and how it will evolve to 2025/6, which in turn should be articulated by a coherent Spatial Strategy. By creating topic based visions and objectives the document is not a spatial plan and as such it is unclear how communities such as Hockley will develop as sustainable communities over the plan period. The plan is unsound as its approach is inconsistent with national policy in PPS12 and as such will be not effective in securing the plan's objectives.

Summary: The document lacks a coherent and comprehensive Spatial Vision and set of objectives for the District and how it will evolve to 2025/6, which in turn should be articulated by a coherent Spatial Strategy. By creating topic based visions and objectives the document is not a spatial plan and as such it is unclear how communities such as Hockley will develop as sustainable communities over the plan period. The plan is unsound as its approach is inconsistent with national policy in PPS12 and as such will be not effective in securing the plan's objectives.

Change to Plan The plan needs to be amended to include an overarching Spatial Strategy which clearly sets out how communities such as Hockley will develop over the period to 2026. This would be consistent with paragraph 4.1 of PPS12 which states that Core Strategies should include, inter alia, an overall vision which sets out how the area and places within it should develop. As currently drafted the Vision is not sufficiently spatial or reflective of the issues and characteristics of Rochford. Nor does it provide sufficient certainty as to how the District will develop. Anyone coming to the Document as a member of the community, or as a utility provider or as an investor will not get a clear direction from the Vision as to how and where Rochford is going as a District to 2026. It should not be left to the remainder of the document to articulate or compensate for the lack of a Spatial Vision. There is excellent guidance via the PAS website on the structure and content of Core Strategies including Spatial Strategies which if followed to would result in a sound document for Rochford.

Appear at exam? No

Soundness Tests i, ii, iii

Core Strategy Submission Document

S - 16867 - 14274 - 3.1 - None

16867 Support

CHAPTER 3 3.1

Respondent: Knight Developments [14274]

Knight Developments
C/o agent

Mr T Dodkins
Strutt & Parker
Coval Hall
Rainsford Road
Chelmsford
Essex

Agent: Strutt & Parker (Mr Trevor Dodkins) [8117]

Strutt & Parker
Coval Hall
Rainsford Road
Chelmsford
Essex

CM1 2QF

01245254603

Full Text: See accompanying Strutt & Parker Planning Document and Cannon Consulting Initial Highways Access and Accessibility Statement.

(Council ref AE27 and AE27a)

Representation submitted in relation to proposed allocation of housing to the south west of Rayleigh and attendance required at examination to support the allocation of this site which is not in the submission document (see other responses to core strategy).

Summary: See accompanying Strutt & Parker Planning Document and Cannon Consulting Initial Highways Access and Accessibility Statement.

(Council ref AE27 and AE27a)

Change to Plan N/A

Appear at exam? Yes **Soundness Tests** N/A

Core Strategy Submission Document

S - 16898 - 14275 - 3.1 - None

16898 Support

CHAPTER 3 3.1

Respondent: Southern and Regional Developments Ltd [14275] **Agent:** Strutt & Parker (Mr Trevor Dodkins) [8117]

Southern and Regional Developments Ltd
Unknown - represented by

Mr T Dodkins
Strutt and Parker
Coval Hall
Rainsford Road
Chelmsford
CM1 2QF

Strutt & Parker
Coval Hall
Rainsford Road
Chelmsford
Essex

CM1 2QF
01245254603

Full Text: See accompanying Strutt and Parker Planning Document, Cannon Consulting Transport Assessment and Flood Risk, Drainage and Services Report.

Council ref AE29, AE29a and AE29b.

Representation submitted in relation to proposed allocation of housing to the south west of Hullbridge. Attendance at examination to support this allocation.

Summary: See accompanying Strutt and Parker Planning Document, Cannon Consulting Transport Assessment and Flood Risk, Drainage and Services Report.

Council ref AE29, AE29a and AE29b.

Change to Plan N/A

Appear at exam? Yes **Soundness Tests** N/A

Core Strategy Submission Document

O - 15911 - 11793 - Housing - i, ii, iii

15911 Object

CHAPTER 4 Housing

Respondent: Mr Brian Guyett [11793]

2 Tonbridge Road,
Hockley
SS55HL
United Kingdom
07736211248

Agent: N/A

Full Text: PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies"
Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound

Summary: PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies"
Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound

Change to Plan RDC to determine and publish policy

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 15925 - 14051 - Housing - i, iii

15925 Object

CHAPTER 4 Housing

Respondent: Hawkwell Action Group (Mrs. Carol Dutton) [14051] **Agent:** N/A

Hawkwell Action Group
84 Thorpe Road
Hawkwell
Essex
SS5
Uk

Full Text: The Hawkwell Action Group
C/O 84 Thorpe Road
Hawkwell
Essex
SS5 4JT

23 October 2009

I wish to register the objections of the Hawkwell Action Group (est.500 Members) to the proposal to build 175 houses in South Hawkwell (which does not exist and is in fact Hawkwell West), on the grounds that it is unsound and legally non-compliant with the Council's own Core Strategy and the Government's PPS12 Policy for the following reasons:

Travel

The Core Strategy says 'locate development in areas where alternatives to car use are more viable', 'reduce the requirement to travel', and accompany any development with requisite highway infrastructure to 'mitigate their impact on the existing network'. It is not possible to do this in Hawkwell West as there is not space for development of local roads, especially in Rectory Road, and any development here would increase the requirement to travel, especially by car. Moving on to Public Transport the Core Strategy states that 'planning should be well related to existing public transport where possible'. There is just one bus to and from Southend/Rayleigh per hour with no prospect of Arriva providing an appropriate service in the long term.

I am told Essex County Council has already acknowledge concern with regard to the bottleneck at the railway bridge at St Mary's Church where additional traffic from other proposed developments in the District will 'rat run' to and from the B1013.

In Short:

- â€¢ Limited public transport
- â€¢ Increased car use causing heavy congestion
- â€¢ Inability to improve highways
- â€¢ Distance from shops
- â€¢ Distance from rail stations

Environment

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of the existing settlement in Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West. This development, if it is to be off Rectory Road, will cause the urban coalescence of Hockley to Ashingdon via Hawkwell, surely this is not in line with spatial planning.

In Short:

- â€¢ Semi rural location unsuitable for large development
- â€¢ Complete loss of character
- â€¢ Loss of green belt
- â€¢ Loss of wildlife (I note the Environmental Report does not mention Muntjack deer located on the site)
- â€¢ NO social, economic or environmental benefits whatsoever

We believe locations for development are based on the 'Call for Sites'. Surely locations should be based on the sustainability criteria within PPS12 and not on something that suits landowners? The proposal in the Rochford Core Strategy for this many houses in the Ward of Hawkwell West is UNSOUND because the vital requirements of PPS12 are not met in terms of sustainability, and therefore the location of Hawkwell West should be removed by The Inspector and the allocation moved to a sustainable location.

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O - 15925 - 14051 - Housing - i, iii

15925 Object

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Yours sincerely

Carol Dutton
On Behalf of the Hawkwell Action Group

Summary: I wish to register the objections of the Hawkwell Action Group (est.500 Members) to the proposal to build 175 houses in South Hawkwell (which does not exist and is in fact Hawkwell West), on the grounds that it is unsound and legally non-compliant with the Council's own Core Strategy and the Government's PPS12 Policy.

Change to Plan The proposal in the Rochford Core Strategy for this many houses in the Ward of Hawkwell West is UNSOUND because the vital requirements of PPS12 are not met in terms of sustainability, and therefore the location of Hawkwell West should be removed by The Inspector and the allocation moved to a sustainable location.

Appear at exam? Yes **Soundness Tests** i, iii

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O - 16133 - 14043 - Housing - i, ii, iii

16133 Object

CHAPTER 4 Housing

Respondent: Rochford District Residents (Mr. John Mason) **Agent:** N/A
[14043]

Rochford District Residents
Wistaria Cottage
Englefield Close
Hawkwell
Essex
SS5 4LE
UK
01702204377

Full Text: Rochford District Residents is a Registered Political Party
Councillor John Mason, Representing the Hawkwell West Ward

This is a representation that the Submission Version of the Rochford Core Strategy is UNSOUND because the location of South Hawkwell and a quantum of 175 houses does not meet the principles and conditions set out in the Core Strategy and that the development is not deliverable in terms of the sustainability criteria of PPS12 and Policy PPS3.

I would like to participate at the oral examination.

The "Location" name of South Hawkwell chosen in the Core Strategy throughout the whole process of consultation has been seriously misleading to the public because the whole of South Hawkwell is included within the District Council Electoral Ward of Hawkwell West which is recognised whilst South Hawkwell is not and can be easily confused with the District Ward of Hawkwell South. I have made representations about this and the Council has declined to make the appropriate change to the Core Strategy.

The Core Strategy specifically refers to protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits apply to this Location and development would be materially detrimental to the character of the existing rural settlement in Hawkwell West.

It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This proposal will adversely affect the character of the existing rural settlement in Hawkwell West.

"The character, layout and form of groups of buildings, streets and spaces make a significant contribution to providing a sense of place and adding to the quality of life in town and country. Residents have a strong sense of identity with their own settlement" Source: RDC, Statement of Place 2008

The Core Strategy says that it is to 'locate development in areas where alternatives to car use are more viable', 'reduce the requirement to travel', and 'accompany any development with requisite highway infrastructure to 'mitigate their impact on the existing network'. It is not possible to do this in Hawkwell West as there is no significant space for development of local roads, especially in Rectory Road, and any development here would increase the requirement to travel, especially by car.

Moving on to Public Transport the Core Strategy states that 'planning should be well related to existing public transport where possible'. There is just one bus route which runs during the daytime (there is no evening service) to and from Southend/Rayleigh with one per hour with no prospect of Arriva providing an appropriate service in the long term. Long term is emphasised because a temporary or fixed period contract/service is not a sustainable service.

This Location is one where the Portfolio Holder has now acknowledged at a Central Area Committee, District Council Meeting that development is "difficult".

It should, therefore, not have been included in the Core Strategy as a Preferred Option and does not warrant the designation of Tier 1 or 2.

Here is a very brief summary of these issues and because of this development at this quantum is not deliverable in terms of the sustainability criteria of PPS12 or under PPS3.

Travel
- limited public transport
- increased car use causing heavy congestion
- inability to improve highways
- distance from shops
- distance from rail stations

Environment

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- semi rural location unsuitable for large development
 - complete loss of character
 - loss of green belt
 - loss of wildlife
- NO social, economic or environmental benefits whatsoever

Having set out a summary I now wish to extend my representation to the detail which is necessary for the Planning Inspector to review the proposal against PPS12 and PPS3.

This letter also represents the collective views of the strong opposition that has been expressed by residents of my Ward through the many letters and emails that have been sent to me and what they have said at four public meetings.

As a Ward Councillor I did not support the proposal of 330 houses in South Hawkwell previously put forward in the Core Strategy and nor do I support 175 because the infrastructure to sustain the development under PPS12 still has been grossly underestimated. Yes, it is difficult to justify the development of a housing estate in this Location. A housing estate under the Government requirements of PP12 expects "mixed use and high density development". This cannot be achieved in this Location. I shall explain why.

"Rochford District is predominantly rural with three larger urban areas and a number of smaller settlements." Source: RDC, Statement of Place 2008

Hawkwell West (South Hawkwell) is not one of the three larger urban areas and is a smaller semi rural settlement which under PPS3 is where "the mix of housing should contribute to the creation of mixed communities having regard to the proportions of households that require market or affordable housing and the existing mix of housing in the locality".

The population profile of Hawkwell West is as follows: Source: Office of National Statistics

0-16	22%
16-24	6.5%
24-30	4%
30-44	23%
45-59	22%
60-90	21%

Lone parent families only account for 5% in Hawkwell West as against other Wards which are double that. Source: RDC, Statement of Place 2008.

"The District is one with an ever increasing percentage of older residents." "The percentage of older people aged over 65-84 is predicted to increase by 53%" "The population of Rochford is expected to age, as the table below shows the fastest growing section of the population is the over 65's." Source: RDC, Statement of Place 2008.

All of these statements directly reflect the situation in Hawkwell West and the effect on the population profile is expected to be at least proportionate.

The position is that this community of South Hawkwell does not have need for a "mixed use and high density development" and the evidence for this is that the proportions of households indicate that 66% are unlikely to require market or affordable housing based on the population profile and projected needs.

There is further evidence for such a conclusion from the Thames Gateway South Essex, Strategic Housing Market Assessment.

"In Rochford, the greatest pressures are for larger properties with three and four bedrooms."

"The majority of household growth is expected to result from increasing single person households. However a high proportion of these are existing older households who already have housing."

"Mainstream housing in both public and private sectors is likely to remain the main means of meeting demand from a growing older population."

"Some vulnerable individuals will however require support or bespoke housing solutions. The levels of support which older households will require will depend on their fitness and mobility and to a degree their age." This means that development to meet such needs must be in the existing centres and the three main urban areas and not places like Hawkwell West which is on the urban fringe and too far away from necessary services.

Furthermore the existing mix of housing in the locality is as follows:

"44% are detached households, 50% are semi-detached households, 3% are terraced houses, 2% are flats and 1% are purpose built flats." Source: Office of National Statistics

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Applying PPS3 "the mix of housing should contribute to the creation of mixed communities having regard to the existing mix of housing in the locality it is evident that the mix of a housing estate under PPS12 and PPS3 would be vastly different to the existing mix. This is a further reason why the proposal for a mixed use and high density housing estate is UNSOUND because it does not follow the policies in PPS12 or PPS3.

One of the most important aspects of sustainability are roads and traffic. There is no space for strategic development of local roads to the level required to support this proposal and other development proposals nearby put forward in the Core Strategy, which will also use roads in Hawkwell West, especially in Rectory Road, where any development here would significantly increase the requirement to travel, especially by car.

What you can readily see from data that I am presenting later in this letter is that there is already a significantly greater flow of traffic, 34% or 10,000 more vehicle movements, in Rectory Road, Hawkwell than even on the B1013.

It is not appropriate for an unclassified road to have to suffer greater traffic flows than even the B1013 and it is not a sustainable option to even consider adding even more traffic from a new housing estate of 175 houses. I believe that the reason for this is that Rectory Road has already become a link road to the B1013 from East Hockley, Hullbridge, Ashingdon and Canewdon to, more importantly, the A127. In addition a large quantum of additional houses planned to be built in the Hullbridge and Brays Lane area will put yet more unacceptable volumes of traffic on to Rectory Road in both directions during a day and this too needs reconsideration.

The traffic jams that are caused on the entry of the B1013 to Southend Borough from Rochford District are legendary and such a development will add to an already unacceptable situation. I have often been assured that the re-development of London - Southend Airport will improve this particular bottleneck but having seen the Planning Application submitted on 13 October it is clear that there are to be no improvements to the traffic flows from Rochford wishing to enter the A127.

The same issue applies in Hall Road at entry to Rochford.

Furthermore ECC has acknowledged concern about the other bottleneck at the railway bridge at St. Mary's Church, Hawkwell where it is not only the additional traffic from the South Hawkwell location that will create jams and congestion there but also additional traffic from other developments "rat running" to and from the B1013. Frankly they said that nothing could be done at the railway bridge to deal with this situation. On this basis the proposed location is unsustainable and a development of 175 houses is not deliverable.

Another very significant objection to the proposal for my Ward is that such a development would cause the coalescence of Hockley to Ashingdon via Hawkwell. To explain that in detail this means that there would then be a contiguous block of houses from Hockley to Hawkwell West and on to Ashingdon and Rochford. Observing that the Location is closely surrounded by existing built development anyway could create a view that this is merely a fill in but at the moment this green belt creates an important and welcome planning break between the existing "rural development in green belt" and Clements Hall Leisure Centre. A previous public inquiry determined that there was to be no development West of Clements Hall.

Any proposal for a housing estate development between the existing built development at say, 40 dwellings per hectare (dph), would be significantly higher than the surrounding areas where these range from 14dph, to 19dph to the highest of 25dph. This would be "infilling and intensification of an existing settlement which cannot be sustained without it's character being adversely affected". The Core Strategy specifically refers to protecting the character of existing settlements and on this basis this proposal is UNSOUND.

Furthermore the (unnecessary) loss of this green belt and the loss of community identity which would create the final urban coalescence of effectively Hockley, Hawkwell and Ashingdon. Rochford District Council has a duty to do everything it can to promote healthy communities and in this area residents fiercely expressed their view at the Central Area Committee that these separate identities must also be preserved in the physical representation of urban development.

A resident suggested at the Council's Central Area Committee that the Council creates some sort of "park" or green non development Zone in Hawkwell West in the Core Strategy to prevent such coalescence. I support this by whatever spatial planning means that can be effected. The Portfolio Holder publicly said this concept interested him and he could see merit in it. But no action has been taken upon it since then. The Core Strategy should be revised by making the Location of South Hawkwell a protected gap by simply leaving this as green belt.

Furthermore the Council has failed to be mindful of the fact that the designation of the area from the "Autoplas" factory is designated as "a rural settlement in green belt" with restriction on development and it is NOT zoned residential in material planning terms. It would be inappropriate, therefore, for the rural settlement to have a housing estate adjoining at much greater density say, 30/40dph, than the density of the rural settlement in green belt which is just 19dph. This strengthens the argument at a technical planning level for retention of this application site as green belt rather than a place for a 175/330 housing estate.

Whilst the Council reduced the quantum to 175, because it has clearly recognised in the prior consultations that

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sustainability is a material consideration in this Location, there are still many significant criteria under PPS12 that are, in my opinion, still not met.

The following questions are pertinent.

Does the location of South Hawkwell promote mixed use and high density development in urban areas? What is the proposed density vs Government Guidance?

Essex County Council (Mark Lawrence, Strategic Planner, Thames Gateway) told me that ECC has been actively assessing General Location 13, as described by RDC in the Call for General locations. This is 11 hectares. For 175 houses that infers a simple density of 16 per hectare against the Government preference of 50 per hectare. 50 per hectare would be significantly out of character with the surrounding area, as indeed would 30 per hectare as noted in PPS3, where existing densities which are much lower. The densities of the surrounding area run from 14dwh, 19dwh and 25dwh. The Government preferences should not be applied because they are seriously out of character. It is not considered that at 16dwh that the Location of South Hawkwell can promote mixed use and a high density development particularly as this is, in any event, not an URBAN AREA. This proposal is UNSOUND and unsustainable under the requirement in PPS12 for a mixed use and high density development.

However if a site of 5/6 hectares were to be developed instead for 175 dwellings then there are still other considerations to apply.

Hawkwell West Ward (aka Hawkwell South) is made up of datasets known as 'Rochford 003A / 003B / 003C' as identified in the Office of National Statistics (ONS) lower layer super output area. According to the ONS, Hawkwell West is made up of 1562 homes and 3938 residents. Of these 44% are detached households, 50% are semi-detached households, 3% are terraced houses, 2% are flats and 1% are purpose built flats.

The proposed development of 175 houses as outlined in the Core Strategy would equate to an increase of 11.2%. (A development of 330 would result in an increase of 21% on the Ward.)

Although the development of the detail of the Core Strategy has not progressed to Allocations Development Plan Document I understand that this will include 'design concept statements' that set out the key elements to be taken into account in the development of specific sites. Nevertheless I believe that at even this stage it is wholly necessary to undertake an exercise to "visualise" the sort of scale of development both required by PPS12 and proposed here for 175 dwellings on say, 5/6 hectares.

The density and style of housing required to create the development requirement of PPS12 even at 30/50dph would be vastly different to the style and density of housing already existent within the Ward as described by the ONS. The proposed level of development would most likely require town houses and flatted developments of 3/3.5 stories to enable the development to be economically deliverable. Deliverability is an important consideration to be applied to the Core Strategy proposals. This style of housing would be out of character area and is only in keeping with Rochford, Ashingdon and Hockley which are up to almost 2km away. If the development could not be delivered without this then the proposal is UNSOUND.

The Council should have followed through from previous consultations and removed South Hawkwell for development and allocated the quantum to a more sustainable location where there is a demonstrable community need for such a housing estate and that could promote a mixed use and high density development in an URBAN AREA.

I still do not believe that the Council has even undertaken an appropriate approach in each "Location" e.g. South Hawkwell, to establish the sustainability criteria that must be met in order for the Rochford Core Strategy to comply with PPS12. I asked for a list of criteria or a template that I could use but nothing was available. On this basis I have produced my own set of criteria.

Because of this I believe that the Council has allocated inappropriate Locations, like South Hawkwell, based purely on the availability of land in the Call for Sites (the old model for local plans as I would call it allocating development land based solely on requests from landowners) rather than making modern and informed judgements against sustainability criteria which flow from PPS12.

In addition the decision of a Planning Inspector relating to the provision of Clements Hall Way made particular reference to the land described then as "West of Clements Hall" but is now evidently the general location now described as South Hawkwell. The Planning Inspector allowed the provision of Clements Hall Way provided that the land "West of Clements Hall" was NOT developed. Whilst it is understood and appreciated that a different set of circumstances may now apply, this was a material issue in the relatively recent past and the Council has not even bothered to explain why this consideration has changed even though this directly relates to the general location of South Hawkwell.

If the Council can't explain, then this general location of South Hawkwell should be removed because a Planning Inspector stated that there is to be no development in this area. Nothing has obviously changed or this would have been notified in the consultation document.

Here are the sustainability criteria that I believe should be met under PPS12 and are unlikely to be met in this Location.

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1. Will a development in South Hawkwell ensure an increased intervention Fire, Police, PCT and Ambulance Service?

Answer

The Fire, Police, PCT and Ambulance Service are unlikely to be able to deploy additional resource and development in South Hawkwell is not sustainable.

2. Will a development in South Hawkwell increase the range and affordability of housing for all social groups?

Answer

This quantum is far greater than the needs of our community. At least 35% must be affordable housing which is not a need at this level and three storey buildings would be incongruous in an area predominantly bungalows and small two storey houses. The population profile in Hawkwell is increasingly skewing towards the retired and frail elderly. 175 dwellings for this purpose is not required. The location does not support either need well looking at the assessment of sustainability needs against other criteria.

3. Is there sustainable access to key services for a development in South Hawkwell?

Answer

Basically no. For all age groups there needs to be regular (meaning every 10/15 minutes) public transport access to Hockley, Rochford, Rayleigh and Southend by direct and regular bus services.

4. Does it meet the residents' needs, as represented by the projected population profile, in terms of sheltered and lifetime homes or those that can be easily adapted so?

Answer

Affordable homes are unlikely to adapt nor are executive style homes likely to adapt either to a population growing at retired and frail elderly categories. The issue of the aging profile of the population of the district is recognised in the Council's Corporate Strategy but the planning for strategic housing distribution in South Hawkwell does not positively respond to this. An increasing retired and frail elderly population needs their specific housing needs to be delivered in existing urban centres themselves and not 2/3 miles away as South Hawkwell is from the nearest existing centres with some key facilities, namely Hockley and Rochford.

5. Is the location of South Hawkwell an existing centre that should be focussed on for enhancement?

Answer

No. Hawkwell West is away from the existing centres and road congestion and the lack of public transport is an issue.

It should not be in Tier 1 or even Tier 2.

6. Does the location of South Hawkwell promote mixed use and high density development in urban areas? What is the proposed density vs Government Guidance?

Answer

Essex County Council (Mark Lawrence) told me that ECC had been assessing General Location 13, as described by RDC in the Call for General locations. This is 11 hectares. For 175 houses that infers a simple density of 16 per hectare against the Government preference of 50 per hectare. 50 per hectare would be significantly out of character with the surrounding area and existing densities which are much lower and nearer the densities of the surrounding area which run from 14dwh, 19dwh and 25dwh. The Government preference should not be applied because it is seriously out of character. It is not considered that at 16dwh that the Location can promote mixed use and high density development particularly as this is not an URBAN AREA.

Hawkwell West Ward (aka Hawkwell South) is made up only of areas known as 'Rochford 003A / 003B / 003C' as identified in the Office of National Statistics lower layer super output area. According to the ONS, Hawkwell West is made up of 1562 homes and 3938 residents. Of these 44% are detached households, 50% are semi-detached households, 3% are terraced houses, 2% are flats and 1% are purpose built flats.

The previously proposed quantum of 330 would result in an increase of 21% on the Ward. The proposed quantum of 175 houses as outlined in the Core Strategy would equate to an increase of 11.2%.

Although the development of the detail of the Core Strategy has not progressed to the Allocation of Sites and Design and Access Statements produced by the Council it is wholly necessary to undertake an exercise to "visualise" the sort of scale of development both required by PPS12 and proposed here for 175 dwellings on half the site.

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The density and style of housing required to create the development requirement of PPS12 would be vastly different to the style and density of housing already existent within the Ward. The proposed level of development would most likely require town houses and flatted developments of 3/3.5 stories. This style of housing would be out of character area and is only in keeping with Rochford, Ashingdon and Hockley which are up to almost 2km away.

7. What provision of infrastructure is required to create a sustainable development in South Hawkwell?

Answer

There is no space for strategic development of local roads to the level required to support this proposal and others in the Core Strategy which are nearby, especially in Rectory Road, where any development here would significantly increase the requirement to travel, especially by car.

There is a major junction, Nursery Corner, which cannot be improved enough for capacity and allow for increased development generated traffic flow from traffic rat running from East Hockley, Hullbridge and Ashingdon to the B1013 and the A127 without significant tail backs.

Rectory Road becomes single file at the railway bridge near St. Mary's Church. This bottleneck cannot be resolved full stop.

There is no footway one side of the Rectory Road and on the other there are telegraph poles in the middle of the path so that prams and wheelchair users have to go into the road.

There are no cycle paths or space for such provision on Rectory Road or the B1013. To use a cycle on these roads is too dangerous.

Here is traffic flow data for a given period (Essex Police) for Rectory Road, South Hawkwell as compared to other local roads including the B1013 which, according to the BBC East TV Programme is the busiest B road in the United Kingdom and in figures verified by ECC is at 72% capacity.

Main Road, Hawkwell

27588

Rectory Road,

38549

Rectory Avenue

13393

Hall Road, Rochford

28644

Ashingdon Road

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27984

What you can readily see from this data is that there is already a significantly greater flow of traffic, 34% or 10,000 more vehicle movements, in Rectory Road, Hawkwell than even on the B1013 which is shown in the data as Main Road, Hawkwell and Hall Road, Rochford.

It is not appropriate for an unclassified road to have to suffer greater traffic flows than even the B1013 and it is not a sustainable option to even consider adding even more traffic from a new housing estate of 175 houses. I believe that the reason for this is that Rectory Road has already become a link road to the B1013 from East Hockley, Hullbridge and Ashingdon to, more importantly, the A127. In addition a large quantum of additional houses planned to be built in the Hullbridge and Brays Lane area will put yet unacceptable volumes of traffic on to Rectory Road in both directions during a day and this too needs reconsideration.

In addition the traffic jams that are caused on the entry of the B1013 to Southend Borough from Rochford District are legendary and such a development will add to an already unacceptable situation. The same issue applies in Hall Road at entry to Rochford.

8. What is the availability of sustainable transport modes in South Hawkwell?

Answer

Arriva have recently cut the 8 bus service from half hourly to hourly with no evening service. In fact the daily service gaps are often scheduled for 1hr 17 minutes which extends to up to 1hr 40 minutes when the service is running late. The existing basis has already rendered living in Hawkwell West as unsustainable on public transport.

(The 18 Service runs only Mondays and Fridays and not as often claimed Daily !! It is ,therefore, not a regular service and is timetabled to run more or less at the same time as the 8. As such it adds no value to sustainability.)

The County Councillor for our area has consulted the County Council Passenger Team to find out what it would cost the County Council to return the part of the route that my Ward is in (it is an optional loop) to a half hourly service. The figure was £100K a year, recurring. And if Arriva were to cancel the service completely in the next 3-5 years, which is highly likely, then the cost will be in excess of £200K each year.

I cannot see a developer being agreeable to meeting this cost which is wholly necessary to meet the needs of the residents of new affordable housing especially on a long term sustainable basis rather than a temporary basis which Arriva will provide only whilst the developer pays. This will then be an unsustainable development. Indeed a developer has only gone as far as saying that "this will be investigated" in its planning application.

The location does not have any cycle routes adjoining nor is there safe walking access for schools and adults.

9. Will a development in South Hawkwell encourage people to use alternative modes of transportation than the private car?

Answer

No. The location is likely to generate more private car journeys and it is unlikely that bus or walking or cycling will prove a viable alternative.

10. Will a development in South Hawkwell reduce the need to travel?

Answer

No, it will generate more private car journeys. And the likely place of work for the new residents is claimed by RDC to be most likely the extension to Southend Airport where there is no bus service, safe walking and cycle route access via the B1013. And traffic jams already at the entry to Southend and Rochford.

11. Will a development in South Hawkwell encourage a large volume of people or transport movements that are located inaccessible locations?

Answer

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Yes, the location is inaccessible.

12. Will a development in South Hawkwell conserve and enhance natural/semi natural habitats?

Answer

No it will destroy them.

13. Will a development in South Hawkwell conserve and enhance species diversity and in particular avoid harm to protected and priority species?

Answer

No. it will reduce diversity and, for example, the Muntjac deer will be exterminated in this area by loss of habitat. I have a witness statement from a local resident as to a recent sighting in South Hawkwell. They tend to occupy territories of around 14 hectares, which they rarely leave. The Thorpe Road or Rectory Road site which is subject to the planning application is 11 hectares. If Rochford District Council is interested in maintaining real species diversity in the District then it must not adopt a location for development that will exterminate this species in Hawkwell. None of the public open spaces which have been transferred by the District Council to Hawkwell Parish Council Hawkwell are maintained as deciduous woodland nor scrub which is suitable for the Muntjac deer and this Thorpe Road habitat should be removed from the proposal.

14. Will a development in South Hawkwell maintain and enhance general locations designated for their nature conservation interest?

Answer

No, it will not. Instead of conservation it will exterminate the Muntjac deer.

15. Will a development in South Hawkwell contribute to the delivery of the enhancement, effective management and appropriate use of land in the urban fringe?

Answer

This is the wrong use of the urban fringe and its use will generate a continuous built form and coalescence.

16. Will a development in South Hawkwell reduce the amount of derelict, degraded and underused land?

Answer

It will take a viable Christmas Tree Farm business out of use. Use of employment land must be resisted.

17. Does the proposal for a development in South Hawkwell reflect the scope of using brownfield land where viable and realistic?

Answer

The Magees general location, a brownfield location very nearby, is on the Call for Sites but is not proposed.

18. Will a development in South Hawkwell improve the landscape?

Answer

No.

19. Will a development in South Hawkwell increase the risk of flooding?

Answer

Yes, this area of Hawkwell West is low lying and prone to flooding, fog and freezing fog.

20. Will a development in South Hawkwell improve air quality?

Answer

No

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21. Is the general location of South Hawkwell in Zone 2 or 3 for Flood Assessment?

Answer

The area nearby is in a flood zone.

22. Could Rainfall be an issue 1/100, 1/250, 1/500 years for a development in South Hawkwell? Evidence of local flooding incident?

Answer

Hawkwell West. Yes. 1/100 -93 houses at risk. 1/200 124 houses at risk. Major Flooding in Rectory Road 1989. Road impassable.

There is a "weir" or dam in the Hawkwell Brook at the boundary of South Hawkwell with the public open space at Spencer's Park. It is believed that this could either flood this area or significantly affect the water table and soil water conditions for construction. If it were to be removed then what would be the effect lower down in Windsor Gardens which already floods? The Council must pay very great attention to this aspect of concern. The Council must contact the Environment Agency.

23. Is a development in South Hawkwell a Brownfield priority?

Answer

It is a greenfield and a nearby brownfield is ignored.

Will a development in South Hawkwell increase light pollution?

Answer

Yes.

24. Is there an existing public transport corridor in South Hawkwell?

Answer

No. Arriva has reduced the service and most probably remove the bus service within 3/5 years.

25. Would a development in South Hawkwell support a virtual community rather than travel? Broadband? Optical delivery?

Answer

Too far from the exchange for the high speed broadband. No optical delivery.

26. From a development in South Hawkwell what is the furthest distance to walk via a safe route to major fixed transport node train every 10/15 mins?

Answer

25 Minutes to Rochford, 20 Minutes to Hockley. Too far.

27. From a development in South Hawkwell what is the furthest distance from regular bus service?

Answer

Arriva has made the bus service hourly. This is not a regular bus service. To Golden X by walking, 15 Minutes, to Hockley by walking, 20 minutes to get to a regular bus service.

28. Is there a network of safe bike routes in South Hawkwell to local facilities?

Answer

No, and the road width does not even incorporate a safe footway in Rectory Road on one side and none on the other. A cycle path could not be included.

29. Traffic management in South Hawkwell - is there safe passage?

Core Strategy Submission Document

O - 16133 - 14043 - Housing - i, ii, iii

16133 Object

CHAPTER 4 Housing

Answer

No. Speeding makes Rectory Road unsafe. Essex Police have the data from information which is RESTRICTED and I cannot publish. Please request this from Essex Police.

30. Will a development in South Hawkwell lead to an increased proportion of energy needs being met from renewable sources?

Answer

No information

I hope that this representation will assist the Planning Inspector to make a decision on the UNSOUND matters raised with regard to the Core Strategy.

In my last response to a consultation on the Core Strategy, despite a specific request to the contrary, my letter was split up and published across the consultation database in many parts. Because of this the letter could not be read in its entirety by anyone despite the fact that issues raised did, of course, interrelate over several pages. Whilst this might be for the convenience of administration by the Council, I believe that this did diminish the understanding of a detailed submission raising material planning considerations. Neither was the submission placed in the bundle of documents to be reviewed by the LDF Sub Committee because the letter, despite being from a Member of the Council, was treated as a personal representation and was treated merely as part of a general summary of several hundred representations. On this occasion I am making this representation as an Organisation, a registered political party. It is a relevant organisation and I am also Party Leader. I request that it appears in any bundle in its entirety under Organisations.

Please do not split this letter up because I wish to Planning Inspector to be able to read my representation as one item.

Councillor John Mason
Party Leader
Representing Hawkwell West Ward

Summary: This is a representation that the Submission Version of the Rochford Core Strategy is UNSOUND because the location of South Hawkwell and a quantum of 175 houses does not meet the principles and conditions set out in the Core Strategy and that the development is not deliverable in terms of the sustainability criteria of PPS12 and Policy PPS3.

Change to Plan Remove South Hawkwell from the list of Locations and transfer the quantum of 175 dwellings to an alternative, viable site that complies with the conditions set out in The Core Strategy, PPS12 and PPS3.

Change Location South Hawkwell to Hawkwell West at a Zero Quantum.

The "Location" name of South Hawkwell chosen in the Core Strategy throughout the whole process of consultation has been seriously misleading to the public because the whole of South Hawkwell is included within the District Council Electoral Ward of Hawkwell West which is recognised whilst South Hawkwell is not and can be easily confused with the District Ward of Hawkwell South. This cannot be legally compliant.

Appear at exam? Yes **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16451 - 14218 - Housing - iii

16451 Object

CHAPTER 4 Housing

Respondent: Barbara Havey [14218]

71 Main Road
Hockley
Essex
SS5 4RG

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.
â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is

16451 Object

CHAPTER 4 Housing

also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

Summary:

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

Previous consultations ignored by RDC:

â€¢ The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

â€¢ The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

Previous consultations ignored by RDC:

The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

â€¢ The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

â€¢ the Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!

â€¢ The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Summary:

16451 Object

CHAPTER 4 Housing

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â€¢ the Foundry Industrial Estate has never even been previously mentioned;
â€¢ The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.
 - 2) (10.28) "There is no immediate capacity for additional floor space."
 - 3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion"
 - 4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".
- The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Summary:

PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

Core Strategy Submission Document

O - 16451 - 14218 - Housing - iii

16451 Object

CHAPTER 4 Housing

Change to Plan

Appear at exam? Not Specified **Soundness Tests** iii

Core Strategy Submission Document

O - 16496 - 9646 - Housing - i

16496 Object

CHAPTER 4 Housing

Respondent: Mrs Margaret Christian [9646]

41 Westminster Drive
Hockley
Essex
SS5 4XD
01702 204320

Agent: N/A

Full Text: Please find enclosed my objection to the Core Strategy Submission DPD. Please kindly acknowledge receipt of this objection and duly register it.

Objections to RDC's Core Strategy Submission DPD

Reason Unsound

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

3. RCD are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

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The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

16496 Object

CHAPTER 4 Housing

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs not, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. Thus it is unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of address the railway bridge bottleneck will be significant but is not mentioned.

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5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

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Neither the Core Strategy or Hockley Area Action Plan (HAAP) defines its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

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9. PPS12, 4.6, states that Cores Strategies show be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which do not indicate how such applications will be handled and does not comply with

Core Strategy Submission Document

16496 Object

CHAPTER 4 Housing

PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

10. The Core Strategy misrepresent the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

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Summary:

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Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16538 - 13921 - Housing - i

16538 Object

CHAPTER 4 Housing

Respondent: Ms H Rozga [13921]

56A Aldermans Hill
Hockley
Essex
SS5 4RW

Agent: N/A

Full Text:

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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16538 Object

CHAPTER 4 Housing

Summary:

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The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

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7. RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates.

The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely.

The Foundry Industrial Estates has never even been previously mentioned in any plan version; A recent amendment to

16538 Object

CHAPTER 4 Housing

the Core Strategy acknowledges this omission was due to a typing error!

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The Foundry Industrial Estate has never even been previously mentioned.

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Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing HAAP consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy or Hockley Area Action Plan (HAAP) defines its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary

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9. PPS12, 4.6, states that Cores Strategies show be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which do not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

10. The Core Strategy misrepresent the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.

2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion".

4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6.

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O - 16538 - 13921 - Housing - i

16538 Object

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Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) "the Council may wish to consider reclassifying Hockley from a town centre to a district centre.

Summary: 9. PPS12, 4.6, states that Cores Strategies show be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which do not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16556 - 13667 - Housing - i

16556 Object

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Respondent: G and S Cooke [13667]

56 Aldermans Hill
Hockley
Essex
SS5 4RW

Agent: N/A

Full Text:

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus service are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

Summary:

Proposals for moving employment to of town locations, at either end of the district, with no existing public transport inks, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

3. RCD are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in

16556 Object

CHAPTER 4 Housing

the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts.

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4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs not, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. Thus it is unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of address the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

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5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

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The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

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The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

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The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely.

The Foundry Industrial Estates has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy acknowledges this omission was due to a typing error!

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8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing HAAP consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy or Hockley Area Action Plan (HAAP) defines its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

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Summary

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9. PPS12, 4.6, states that Cores Strategies show be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which do not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

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The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.

Core Strategy Submission Document

O - 16556 - 13667 - Housing - i

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2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion".

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The Core Strategy is inaccurate, misleading and unsound.

Summary:

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Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16589 - 14231 - Housing - i

16589 Object

CHAPTER 4 Housing

Respondent: Heather Wakefield [14231]

Not provided

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighboring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.
â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

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The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

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CHAPTER 4 Housing

Summary:

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• The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

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Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

• The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

• the Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!

• The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Summary:

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

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16589 Object

CHAPTER 4 Housing

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Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.
 - 2) (10.28) "There is no immediate capacity for additional floor space."
 - 3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion"
 - 4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".
- The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Summary:

PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16606 - 14232 - Housing - i

16606 Object

CHAPTER 4 Housing

Respondent: Roger Wakefield [14232]

Not provided

SS5 4UX

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighboring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

16606 Object

CHAPTER 4 Housing

Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modeling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

Summary:

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

Previous consultations ignored by RDC:

• The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

• The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

Previous consultations ignored by RDC:

The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

• The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

• the Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!

• The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Summary:

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

• The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

16606 Object

CHAPTER 4 Housing

â€¢ the Foundry Industrial Estate has never even been previously mentioned;
â€¢ The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.
 - 2) (10.28) "There is no immediate capacity for additional floor space."
 - 3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion"
 - 4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".
- The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Summary:

PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

16860 Object

CHAPTER 4 Housing

Respondent: Mrs Kathleen Pike [14270]

34 Mortimer Road
Rayleigh
Essex
SS6 9NX
01268 780516

Agent: N/A

Full Text:

- (1) Sewer known to overflow into Crouch at Battlesbridge.
- (2) Power cuts to domestic homes through the year
- (3) Reservoir at Hanningfield has difficulty coping with demand.
- (4) Schools overcrowded.
- (5) Open spaces owned by council below requirement has the size of Rayleigh population.
- (6) The land in agricultural and homes should be no more than 4 to the acre.

- (1) Larger sewer.
- (2) Increased power.
- (3) Another reservoir.
- (4) Grammar School.

Summary:

- (1) Sewer known to overflow into Crouch at Battlesbridge.
- (2) Power cuts to domestic homes through the year
- (3) Reservoir at Hanningfield has difficulty coping with demand.
- (4) Schools overcrowded.
- (5) Open spaces owned by council below requirement has the size of Rayleigh population.
- (6) The land in agricultural and homes should be no more than 4 to the acre.

Change to Plan

- (1) Larger sewer.
- (2) Increased power.
- (3) Another reservoir.
- (4) Grammar School.
- (5) Insist that selling agent tells buyers of homes.

Appear at exam? No

Soundness Tests iii

Core Strategy Submission Document

O - 16164 - 14185 - Vision - iii

16164 Object

CHAPTER 4 Vision

Respondent: The JTS Partnership on behalf of John Bishop
[14185]

The JTS Partnership on behalf of John Bishop
Number One, The Drive
Great Warley
Brentwood
Essex
CM13 3DJ
United Kingdom

Agent: Mr Sean Marten [9337]

The JTS Partnership LLP
Number One, The Drive
Great Warley
Brentwood
Essex
CM13 3DJ
United Kingdom
01277 224664

Full Text:

In PPS3 it states that the Local Planning Authorities should identify sufficient specific deliverable sites to deliver housing in the first five years. To be considered deliverable, sites should, at the point of adoption of the relevant Local Development Document:

- Be Available - the site is available now.
- Be Suitable - the site offers a suitable location for development now and would contribute to the creation of sustainable, mixed communities.
- Be Achievable - there is a reasonable prospect that housing will be delivered on the site within five years.

The delivery of the sites in five years should be carefully considered and adhere to PPS3

PPS3 also provides guidance to encourage residential developments to take place with particular reference to transport. At paragraph 16 PPS3 makes particular reference to asserting that proposed development should be: - "easily accessible and well connected to public transport in the community, facilities and services."

Summary:

The delivery of the sites in five years should be carefully considered and adhere to PPS3.

Change to Plan

observation to Housing objectives.

Appear at exam? No

Soundness Tests iii

Core Strategy Submission Document

O - 16837 - 7704 - Vision - iii

16837 Object

CHAPTER 4 Vision

Respondent: English Heritage (Ms K Fletcher) [7704]

Agent: N/A

English Heritage
Brooklands
24 Brooklands Avenue
Cambridge
CB2 2BU

Full Text: ROCHFORD LOCAL DEVELOPMENT FRAMEWORK
CORE STRATEGY SUBMISSION DOCUMENT

Thank you for your letter dated 21 September 2009 consulting English Heritage on the above document. Our comments are set out below.

CHAPTER 4 HOUSING

Vision and objectives

While we note that character of place is addressed in chapter 5, it is important that this consideration is recognised as relevant within the Housing chapter. Paras 2.33, 2.69 and 2.73 also recognise the importance of character and sense of place in the built environment. We recommend that this consideration should be integrated into the vision and objectives for housing in order to improve the clarity of the plan, and its consistency with advice in PPS1.

Recommendation:

The following amendments are suggested:

- Vision in five years: add 'settlement character' after 'infrastructure'
- Vision by 2025: add 'and places' after 'communities' in bullet 1
- Objectives: In objective 2 amend to '...sustainable locations, enhancing sense of place and having regard to..'
- Para 4.19: Amend bullet 5 to read 'The historical, agricultural and ecological value of land, and settlement character'

CHAPTER 5 CHARACTER OF PLACE

We strongly support this section and policies CP1, CP2 and CP3. In the absence of policy coverage for listed buildings and scheduled monuments we recommend that para 5.9 should refer to PPGs 15 and 16, as well as draft PPS15.

CHAPTER 8 ENVIRONMENTAL ISSUES

We welcome the references the historic environment in the objectives and in policies ENV1 and ENV2.

Policy ENV6 Large Scale Renewable Energy Projects

We consider that this policy should refer to the historic interest of sites to reflect the advice in PPS22 more appropriately.

Recommendation: amend the first bullet in policy ENV6 to read '...it's ecological, historic or landscape value...'

CHAPTER 11 ECONOMIC DEVELOPMENT

Policy ED2 London Southend Airport

We understand that the grade I listed church in the vicinity of the runway will be protected in any proposals for expansion of the airport and the Core Strategy policy does not suggest otherwise. We will respond to the detail of proposals for the airport through responses to consultations on the Joint Area Action Plan and any planning applications.

In the interests of clarity, the above comments where we suggest changes to the Core Strategy should be recorded as objections to the soundness of the plan in terms of consistency with national guidance. However, we hope that it will be possible to agree amendments on these points prior to the public examination.

We would be happy to discuss any of these comments if you would find this useful.

Summary:

Vision and objectives

While we note that character of place is addressed in chapter 5, it is important that this consideration is recognised as relevant within the Housing chapter. Paras 2.33, 2.69 and 2.73 also recognise the importance of character and sense of place in the built environment. We recommend that this consideration should be integrated into the vision and objectives for housing in order to improve the clarity of the plan, and its consistency with advice in PPS1.

Change to Plan

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The following amendments are suggested:

- Vision in five years: add 'settlement character' after 'infrastructure'
- Vision by 2025: add 'and places' after 'communities' in bullet 1

Core Strategy Submission Document

O - 16837 - 7704 - Vision - iii

16837 Object

CHAPTER 4 Vision

Appear at exam? Not Specified

Soundness Tests iii

Core Strategy Submission Document

S - 15967 - 13441 - Objectives - None

15967 Support

CHAPTER 4 Objectives

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: It is unclear how settlements are determined to be "viable" although Paragraph 4.8 provides some criteria.

Summary: It is unclear how settlements are determined to be "viable" although Paragraph 4.8 provides some criteria.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16165 - 14185 - Objectives - iii

16165 Object

CHAPTER 4 Objectives

Respondent: The JTS Partnership on behalf of John Bishop
[14185]

The JTS Partnership on behalf of John Bishop
Number One, The Drive
Great Warley
Brentwood
Essex
CM13 3DJ
United Kingdom

Agent: Mr Sean Marten [9337]

The JTS Partnership LLP
Number One, The Drive
Great Warley
Brentwood
Essex
CM13 3DJ
United Kingdom
01277 224664

Full Text: The principle of prioritising the re-use of previously developed land is a well-established approach to maximising sustainable development. The Core Strategy acknowledges the strategic and local importance of the Green Belt. However Whilst accepting that most new development should be on brownfield land and limiting the amount of development in the green belt, recognition should be given to the need for some additional development on greenfield sites adjacent to existing settlements. This will particularly be the case where there is insufficient previously developed land to accommodate the need for growth within the district.

Summary: The principle of prioritising the re-use of previously developed land is a well-established approach to maximising sustainable development. The Core Strategy acknowledges the strategic and local importance of the Green Belt. However Whilst accepting that most new development should be on brownfield land and limiting the amount of development in the green belt, recognition should be given to the need for some additional development on greenfield sites adjacent to existing settlements. This will particularly be the case where there is insufficient previously developed land to accommodate the need for growth within the district.

Change to Plan Observation with regards to housing objectives for the plan period.

Appear at exam? No **Soundness Tests** iii

Core Strategy Submission Document

O - 16838 - 7704 - Objectives - iii

16838 Object

CHAPTER 4 Objectives

Respondent: English Heritage (Ms K Fletcher) [7704]

Agent: N/A

English Heritage
Brooklands
24 Brooklands Avenue
Cambridge
CB2 2BU

Full Text: ROCHFORD LOCAL DEVELOPMENT FRAMEWORK
CORE STRATEGY SUBMISSION DOCUMENT

Thank you for your letter dated 21 September 2009 consulting English Heritage on the above document. Our comments are set out below.

CHAPTER 4 HOUSING

Vision and objectives

While we note that character of place is addressed in chapter 5, it is important that this consideration is recognised as relevant within the Housing chapter. Paras 2.33, 2.69 and 2.73 also recognise the importance of character and sense of place in the built environment. We recommend that this consideration should be integrated into the vision and objectives for housing in order to improve the clarity of the plan, and its consistency with advice in PPS1.

Recommendation:

The following amendments are suggested:

- Vision in five years: add 'settlement character' after 'infrastructure'
- Vision by 2025: add 'and places' after 'communities' in bullet 1
- Objectives: In objective 2 amend to '...sustainable locations, enhancing sense of place and having regard to..'
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We strongly support this section and policies CP1, CP2 and CP3. In the absence of policy coverage for listed buildings and scheduled monuments we recommend that para 5.9 should refer to PPGs 15 and 16, as well as draft PPS15.

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We welcome the references the historic environment in the objectives and in policies ENV1 and ENV2.

Policy ENV6 Large Scale Renewable Energy Projects

We consider that this policy should refer to the historic interest of sites to reflect the advice in PPS22 more appropriately.

Recommendation: amend the first bullet in policy ENV6 to read '...it's ecological, historic or landscape value...'

CHAPTER 11 ECONOMIC DEVELOPMENT

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We understand that the grade I listed church in the vicinity of the runway will be protected in any proposals for expansion of the airport and the Core Strategy policy does not suggest otherwise. We will respond to the detail of proposals for the airport through responses to consultations on the Joint Area Action Plan and any planning applications.

In the interests of clarity, the above comments where we suggest changes to the Core Strategy should be recorded as objections to the soundness of the plan in terms of consistency with national guidance. However, we hope that it will be possible to agree amendments on these points prior to the public examination.

We would be happy to discuss any of these comments if you would find this useful.

Summary:

Vision and objectives

While we note that character of place is addressed in chapter 5, it is important that this consideration is recognised as relevant within the Housing chapter. Paras 2.33, 2.69 and 2.73 also recognise the importance of character and sense of place in the built environment. We recommend that this consideration should be integrated into the vision and objectives for housing in order to improve the clarity of the plan, and its consistency with advice in PPS1.

Change to Plan

Recommendation:

Objectives: In objective 2 amend to '...sustainable locations, enhancing sense of place and having regard to..'

Appear at exam? Not Specified

Soundness Tests iii

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

16246 Object

CHAPTER 4 Introduction

Respondent: Colonnade Land LLP [9177]

Colonnade Land LLP
Fifth Floor
17-19 Maddox Street
London
W15 2QH
020 7255 7490

Agent: Icen Projects Limited (David Churchill) [10057]

Icen Projects Limited
83 Victoria Street
London
SJ1H 0HW

Full Text: ROCHFORD DISTRICT COUNCIL - LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY SUBMISSION
SEPTEMBER 2009

Icen Projects Ltd (Icen) has been instructed by Colonnade Land LLP (Colonnade) to submit representations to the Rochford Local Development Framework Core Strategy Submission (CSS).

a) Overview

It is our conclusion that the CSS is not justified, effective or consistent with national policy, as required by Planning Policy Statement 12: Creating Strong Safe and Prosperous Communities through Local Spatial Planning (PPS12) and is therefore vulnerable to being found unsound by an Inspector through the Examination in Public.

b) Background and Summary

These representations follow those made by Icen on behalf of Colonnade to the Preferred Options Core Strategy, submitted via letter dated 17 December 2008. In this regard, we would request that the Council confirms that the representations made to the Preferred Options Core Strategy will be taken into account alongside the current representations, particularly as there are a number of cross references between the two sets of representations.

It is not considered necessary to reiterate the content of the previous representations, as they were made at the appropriate stage and will be considered by the Planning Inspectorate in due course, but it is inevitable that certain elements will require restating where it is not clear that they have been taken into account in the production of the CSS. For clarity, therefore, Colonnade feel that it is appropriate to clarify the 'in-principle' issues that were raised in the representations to the Preferred Options Core Strategy, recognising that these issues were raised in the context of a wider and more coherent justification made within the representations:

- â€¢ Further cross-referencing of the recommendations made within the evidence base is required;
- â€¢ Greater focus should be placed on promoting Rochford as the principal settlement within the District;
- â€¢ Coombes Farm is the most logical location for residential development abutting the urban area of Rochford and as such warrants recognition as a general location for residential development;
- â€¢ The allocation of Three Ashes Farm for employment generating uses will be pursued;
- â€¢ Recognition that it is not realistic to expect residential allocations to be met mainly on Brownfield sites, nor should the intensification of smaller sites in residential areas be pursued;
- â€¢ Many of the sites identified as suitable for residential development will not be viable and will not come forward for development within the timescales anticipated;
- â€¢ The failure to provide the necessary justification for the proposed infrastructure improvements sought in Appendix H1;
- â€¢ The inclusion of an affordable housing exception policy was sought; and
- â€¢ The need to identify sites capable of delivering employment growth in the short term.

Following assessment of the CSS presented by the Council for consultation prior to submission to the Secretary of State, Colonnade considers the Plan to be 'unsound' as the document consistently fails to meet the tests of soundness set out in the table following Paragraph 4.52 of PPS12. For clarity, PPS12 confirms that to be 'sound' a Core Strategy should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY and defines 'justified' as "founded on a robust and credible evidence base" and "the most appropriate strategy when considered against the reasonable alternatives" and 'effective' as "deliverable", "flexible" and "able to be monitored".

The rationale for the above is identified in the remainder of these representations, which are provided in the interests of ensuring the Council delivers a strong, robust and logical Core Strategy that guides the future development of the District in a justified and effective manner.

b) Colonnade

As the Council is aware from previous submissions to the Local Development Framework, Colonnade is a strategic land company with a particular interest in the future development of the District as a consequence of a number of sites that it controls, particularly around Rochford.

The Council will also be aware that Colonnade has recently submitted an outline planning application for the residential development of the land at Coombes Farm, Rochford to provide a sustainable urban extension comprising up to 326

16246 Object

CHAPTER 4 Introduction

residential dwellings, with associated accesses and community uses. Whilst the planning application process is clearly separate from the Local Development Framework production process, Colonnade wishes to continue the promotion of the site as a suitable location for residential development.

Accordingly, these representations focus on the legal requirements and tests of soundness associated principally with the Housing and Employment chapters of the CSS, with reference where appropriate to the sites that are controlled by Colonnade, the outline planning application at Coombes Farm and other issues where relevant.

c) Housing

i. Date of Adoption

The CSS assumes an adoption date of 2010 and plans for the provision of housing to 2025.

Taking account of the potential delays to the adoption of the Plan, including the Examination process, it would be more appropriate for the CSS to provide sufficient flexibility to allow for delays in its adoption. Colonnade considers an adoption date of 2011 for the CSS is a more realistic target.

Taking account of the advice in Paragraph 4.13 of PPS12, which states that the time horizon for the Core Strategy should be "at least 15 years from the date of adoption" it would be appropriate for the CSS to plan for the provision of housing to 2026 at the earliest. As such, Colonnade does not consider the CSS to be 'flexible' in the context of the tests of soundness in the table following Paragraph 4.52 of PPS12.

ii. Housing Delivery

However, setting the above aside, the Housing Chapter identifies the minimum housing delivery target for the period 2001 to 2021 of 4,600 dwellings as set out in the East of England Plan, with the annual average requirement of 250 dwellings per annum to extend provision from 2021 to 2025. It also confirms that the residual target for the period 2006 to 2021 is 3,790 dwellings, taking account of the delivery of 810 dwellings in the period 2001 to 2006, and a further 618 dwellings have been completed between 2006 and 2008.

This leaves a residual housing provision target of a minimum of 3,172 dwellings in the period 2008 to 2021. Taking into account the required provision beyond 2021, the residual housing provision target in the period 2008 to 2025 is a minimum of 4,172 dwellings. The disparity between these figures and those provided within the CSS are explained by the rounding down of the annual average delivery requirement in the period 2006 to 2021 to 250 dwellings per annum, compared with the actual figure of 252.67.

The table at Paragraph 4.6 of the CSS identifies the source of housing provision that will meet the identified minimum requirements and includes figures for 'Extant Planning Permissions' and 'Existing allocations/other appropriate sites identified in Strategic Housing Land Availability Assessment'. These figures, along with the actual completions within the period are combined to produce the figure for the 'Total without Green Belt release' figure.

Setting aside the concern regarding under-provision associated with the rounding down of the annual average delivery requirement in the period 2006 to 2021, the CSS fails to identify the sites that will contribute to the 'Extant Planning Permissions' provision. The identification of the sites that will contribute to the 'Extant Planning Permissions' should be provided in the context of the findings of the Inspector in the appeal by Asprey Homes [APP/G5180/A/07/2043219/NWF] who determined that the reliance on a delivery rate of 100% is unsafe [IR287].

Furthermore, at the time of writing these representations, the Strategic Housing Land Availability Assessment 2009 has not been published. It is impossible therefore for a full assessment of the proposed housing provision to be undertaken to confirm whether the CSS is 'founded on a robust and credible evidence base' [test of soundness in the table following Paragraph 4.52 of PPS12].

iii. Redevelopment of Employment Sites

Paragraph 4.14 of the CSS refers to the identification of the four employment sites that are considered by the Council to be suitable for redevelopment to residential use. However, the failure to publish the Strategic Housing Land Availability Assessment 2009 either before or alongside the publication of the CSS means that the assumptions made by the Council as to the suitability, availability, viability and deliverability of the sites cannot be assessed.

It has been necessary, therefore, to review the assumptions made in the Rochford Urban Capacity Study 2007 (UCS) regarding the sites. Within the section of the UCS entitled 'Redevelopment of Established Employment Land' [pages 22 & 23] includes a list of those sites assessed, their indicative capacities and the probability of residential development coming forward at the sites within the plan period (identified elsewhere as 2001 - 2021). The list includes the four sites identified in the CSS of Eldon Way/Foundry Estate, Hockley; Rawreth Lane Industrial Estate, Rayleigh; Stambridge Mills; and Star Lane Industrial Estate, Great Wakering.

In total, the UCS identifies an indicative residential redevelopment capacity of 486 units on the four sites (118, 220, 60 and 88 respectively). Of these, it identifies the Rawreth Lane Industrial Estate and Stambridge Mills as having a 'high'

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probability of coming forward for development in the Plan period (2001 - 2021), which would deliver 280 residential dwellings using the Council's own figures. The Star Lane Industrial Estate (referred to in the UCS as the Star Lane Brickworks) is identified as having a 'medium' probability of coming forward for development in the Plan period, with capacity to deliver 88 residential dwellings. It is unclear, therefore, where the figure for 'Existing allocations/other appropriate sites identified in Strategic Housing Land Availability Assessment'.

Set against this is the identification of these four sites in the CSS as being capable of delivery for residential development within the Plan period, with 671 units delivered between 2006 and 2015 and a further 506 units between 2015 and 2021.

The UCS also states in the same section that:

"There are considerable areas of land in the district that are currently allocated for, and in use as, employment land. The redevelopment of such sites for residential use would reduce demand for residential development on greenfield sites, but would at the same time create a need for alternative sites to be found for employment. Such an approach, which would be likely to require the decontamination of existing employment land to make it fit for residential use, together with development of a greenfield site and implementation of additional infrastructure to serve the new employment area, may well be unsustainable." [our emphasis]

The UCS appears to confirm therefore, that not only would the redevelopment of the four sites listed in the CSS be unlikely within the Plan period, but also potentially unsustainable. In this regard, it is notable that the promoters of Stambridge Mills sought the Screening Opinion of the Council as to whether Environmental Impact Assessment of the planning application for the redevelopment of the site for residential use was required in 2007, but to date are yet to submit a planning application for the redevelopment of the site.

In light of this, Colonnade does not consider the CSS is 'the most appropriate strategy when considered against the reasonable alternatives' [test of soundness in the table following Paragraph 4.52 of PPS12], which include the provision of residential development in East Rochford.

iv. Strategic Housing Growth to the East of Rochford

Furthermore, whilst paragraph 2.62 of the CSS identifies concern relating to the identification of locations to the east of Rochford for development on the basis that 'vehicular movements would inevitably be directed through Rochford's historic core', the CSS later identifies Stambridge Mills as a suitable site for residential redevelopment.

In light of the evident conflicts between the evidence base provided in support of the CSS and the absence of other evidence, the CSS is not considered 'sound' in the context of the tests of soundness in the table following Paragraph 4.52 of PPS12.

v. Housing Trajectory

Paragraph 4.28 of the CSS confirms that policies H1, H2 and H3 of the CSS will deliver housing supply as illustrated in the Housing Trajectory at Appendix H2. This Housing Trajectory is transposed from the 2008 Annual Monitoring Report (AMR).

Whilst on the face of it, the Housing Trajectory appears to confirm that the Council can meet its requirement to identify a five year housing supply, many of the sites identified within the AMR do not conform to the guidance issued by CLG in August 2008, on the assessment of a five year land supply. The guidance identifies sites that can be included within the five year assessment of housing supply as:

"those that are allocated for housing in the Development Plan, sites that have planning permission (outline or full planning permission that has not been implemented) and specific, unallocated brownfield sites that have the potential to make a significant contribution to housing delivery during the 5 year period".

Table 4.10: Projected Net Completions of the AMR confirms that the five year housing land supply figure includes sites from 'other land allocated for residential purposes', which are based on land allocations outside existing settlements. However, it should be clarified that these land allocations are not currently allocated for housing development in an adopted Development Plan. As such, these unallocated greenfield sites that are yet to make significant progress through the planning system should be discounted and the five year housing land supply recalculated.

The table below has been prepared to confirm the extent of the shortfall should the sites from 'other land allocated for residential purposes' be removed from the calculation of the Rochford five year housing land supply, in accordance with the guidance issued by CLG:

Recalculated Five Year Housing Land Supply (2009 - 2014):

Year
1st April 2009 to 31st March 2010
Predicted Delivery (A)

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106 dwellings
Allocations on 'other land allocated for residential purposes' (B)
0
Residual delivery (A-B)
106 dwellings
Delivery Shortfall
0

Year
1st April 2010 to 31st March 2011
Predicted Delivery (A)
217 dwellings
Allocations on 'other land allocated for residential purposes' (B)
150
Residual delivery (A-B)
67 dwellings
Delivery Shortfall
150

Year
1st April 2011 to 31st March 2012
Predicted Delivery (A)
544 dwellings
Allocations on 'other land allocated for residential purposes' (B)
300
Residual delivery (A-B)
244 dwellings
Delivery Shortfall
300

Year
1st April 2012 to 31st March 2013
Predicted Delivery (A)
395 dwellings
Allocations on 'other land allocated for residential purposes' (B)
375
Residual delivery (A-B)
20 dwellings
Delivery Shortfall
375

Year
1st April 2013 to 31st March 2014
Predicted Delivery (A)
300 dwellings
Allocations on 'other land allocated for residential purposes' (B)
300
Residual delivery (A-B)
0 dwellings
Delivery Shortfall
300

TOTAL

Predicted Delivery (A)
1,562 dwellings

Allocations on 'other land allocated for residential purposes' (B)
1,125 dwellings

Residual delivery (A-B)
437 dwellings

Delivery Shortfall
1,125 dwellings

The above table confirms that the removal of the 'other land allocated for residential purposes' from the calculation of the Rochford five year housing land supply leaves the Council with a minimum net additional housing delivery of 437 dwellings, which equates to a supply of 1.7 years based on the adjusted annual delivery target of a minimum of 255 net

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additional dwellings per annum. As such, the Council is failing to meet its requirement to demonstrate a five year housing land supply in accordance with PPS3 and the supporting guidance provided by CLG. It is notable that the recent application by David Wilson Homes at Land between Main Road and Rectory Road and Clements Hall Way, Hawkwell identifies an even greater shortfall in the Council's five year housing land supply.

In addition to the above, the AMR does not include a commentary on how deliverability has been assessed against the requirements of paragraph 54 of PPS3.

Furthermore, the guidance from CLG confirms that the windfall sites cannot be relied upon in demonstrating a five year supply unless a Local Planning Authority can demonstrate genuine local circumstances exist to allow this exception. However, the second paragraph of the section entitled 'Housing Trajectory and Five Year Housing Supply' confirms that the estimated completions in the years 2008 to 2013 includes estimated yields through 'intensification' coming forward in future years. With reference to the definition of 'intensification' on page 13 of the AMR, it appears that the 'Housing Trajectory and Five Year Housing Supply' also includes provision for windfall sites. As such, the Council is required to demonstrate the 'genuine local circumstances exist to allow this exception'.

The pressures on delivery and need for additional sites are more acute when it is considered that an average delivery rate of 204 dwellings per annum was achieved during a strong period of housing market growth. In view of the current economic downturn, and significant problems faced within the housing market, the Council should seek to identify appropriate and deliverable sites to meet its regional housing target provision commitments. Suitable sites would include Coombes Farm, which has been positively promoted for development through the LDF process.

It may, therefore, be more appropriate for the Council not merely to allocate sufficient sites to meet the minimum targets set down by the East of England Plan, but to identify a reservoir of land capable of coming forward for development should the sites identified through the CSS and Allocations Development Plan Documents (DPD) fail to come forward for development within the anticipated timescales.

vi. Appendix H1

As set out in the representations to the Preferred Options Core Strategy, there is continuing concern that the list of improvements to infrastructure required in support of residential development as set out in Appendix H1 fails to provide the necessary justification for its inclusion. Whilst the preamble seeks to clarify why the infrastructure is sought, the inclusion of this list should be fully justified, otherwise it is of little value. Furthermore, it would be of benefit to provide further details of the existing community infrastructure provision and capacity within the evidence base.

The failure to provide the necessary justification for its inclusion means that the CSS will not be 'founded on a robust and credible evidence base' [test of soundness in the table following Paragraph 4.52 of PPS12].

d) Character of Place

As set out in the representations to the Preferred Options Core Strategy, Colonnade considers that, with respect to the requirement to produce and adhere to Development Briefs for large residential developments, as set out in Policy CP1, the Council should not seek to impose further demands on developers where existing regulations provide sufficient requirements regarding design. In this instance, Design and Access Statements provide sufficient design guidelines for developments and there is no additional information provided in the policy or supporting text that clearly sets out the justification for this requirement.

e) Green Belt

With reference to the comments regarding the redevelopment of employment sites under the 'Housing' section above and the requirement to allocate sufficient land to meet the minimum housing provision targets as required by the East of England Plan, Colonnade considers that the chapter on Green Belt, and policy GB1 in particular, fails to provide the necessary evidence base that will allow it to be monitored effectively.

It is inherent that the proposed redevelopment of previously developed employment sites for residential use in order to reduce the requirement to allocate previously undeveloped land for residential use will displace these employment uses. In turn, therefore, the separate allocation of previously undeveloped Green Belt to accommodate the compensatory employment provision is required. This is accepted in principle at paragraph 11.11 of the CSS.

Without providing clarification of the anticipated quantum of land required to accommodate the provision of housing and compensatory and new employment land, it is not possible to monitor the performance of policy GB1.

However, using the Council's figures in the table setting out the breakdown of the housing provision figures in Chapter 4 of the CSS (assuming that actual completions and extant permissions are all on previously developed land), setting aside the displacement of employment uses referred to above, approximately 42% of the required minimum housing provision target is capable of being accommodated on previously developed land (2,005 units from a total of 4,750). As such, the Council is required to provide at least 58% of the required minimum housing provision target on the Green Belt (2,745 units from a total of 4,750).

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If these figures are adjusted to take account of the displacement of employment uses (assuming the provision of an equal quantity of land is required to compensate for the employment land that is redeveloped), this figure changes to 17.5% on previously developed land and 82.5% on Green Belt (828 and 3,922 units from a total of 4,750 respectively). Even allowing for the achievement of higher densities of employment on new developments, the figures above are unlikely to change significantly.

Furthermore, the table in Chapter 4 also confirms that no previously developed land will be available for development beyond 2021, or 2015 if account is taken of the displacement of the employment uses.

In light of this, not only does Chapter 6 fail to provide the necessary evidence base that will allow it to be monitored effectively, it is also necessary to consider whether it presents the most appropriate strategy for addressing the required release of Green Belt land to accommodate the defined housing and employment delivery targets to 2025 and beyond as necessary. Colonnade considers a more robust approach that is flexible and capable of being monitored, would be to clearly identify those sites capable of delivery in the short term, which for the avoidance of doubt includes those sites being promoted by Colonnade, with a reservoir of alternative sites set aside for future growth.

As set out in the representations to the Preferred Options Core Strategy, Colonnade considers that the inclusion of an affordable housing exception policy within the CSS will aid the delivery of community housing within rural areas. However, the CSS does not contain such a policy, or adequately address the issue of community housing within rural areas and the CSS is not considered to provide sufficient flexibility to allow for the delivery of essential rural housing.

f) Environmental Issues

Colonnade has concerns regarding the justification for and effectiveness of a number of the policies contained within the Environmental Issues chapter, as follows:

â€¢ Policy ENV1: The Council fails to identify how it will "maintain, restore and enhance" the sites of nature conservation importance that are identified, or how the performance of this policy will be monitored;

â€¢ Policy ENV3: In the context of the advice at paragraph 4.32 of PPS12 regarding the reformulation of national policies, Colonnade does not consider that this policy is required; and

â€¢ Policy ENV9: As set out in the representations to the Preferred Options Core Strategy, Colonnade does not consider that the necessary evidence base has been provided to justify a policy that seeks to go above and beyond the policy targets for the Code for Sustainable Homes as set out by Central Government.

g) Community Infrastructure, Leisure and Tourism

Policy CLT1 refers to the requirement for residential and employment development to contribute to the infrastructure identified in Appendix CLT1 through Standard Charges.

However, whilst the general principle of securing planning obligations through the application of standard charges is broadly accepted, the list of infrastructure requirements set out in Appendix CLT1 is not supported by sufficient evidence base to identify its robustness and credibility. As such, Colonnade does not consider either policy CLT1 or Appendix CLT1 is justified in the context of PPS12.

It is also noted that, despite the clarification sought by Colonnade at the Core Strategy Preferred Options stage, the CSS fails to confirm what information should be contained within Health Impact Assessments, which are required by policy CLT4. Once again, Colonnade requests further clarification of what is involved in the assessment and the expected outputs, which will provide greater clarity and will allow the policy to be monitored.

h) Transport

Policy T8 confirms that the Council will apply minimum parking standards. As set out in the representations to the Preferred Options Core Strategy, the guidance in Planning Policy Guidance Note 13: Transport (PPG13) is clear regarding the imposition of parking standards.

Paragraphs 52-56 of PPG13 confirm that the Local Planning Authorities should apply maximum not minimum parking standards. In order to satisfy the legal requirements set out in PPS12, the policy must reflect PPG13 to promote sustainable transport choices and further provide incentives for developers to locate further residential land closer to local service centres by requiring maximum parking standards for residential developments.

i) Economic Development

As set out in the representations to the Preferred Options Core Strategy, the land at Three Ashes Farm provides an excellent opportunity to deliver employment growth in the short term and may be a suitable site for the 'Eco-Innovation Centre' that is being promoted by the Council. Its identification as a suitable location for strategic employment growth, or the provision of an Eco-Innovation Centre, would accord with the general principles of the policies contained within Chapter 11.

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The identification of Purdeys Industrial Estate as fit for purpose (in paragraph 11.32 and the Council's 2008 Employment Land Study 2008) and therefore it should be maintained and if possible expanded, is welcomed and Colonnade considers that Three Ashes Farm could deliver this expansion, providing a natural extension to Purdeys Industrial Estate and being strategically located close to the Airport.

Three Ashes would address the negative impacts that the nearby residential area experiences from the existing Industrial Estate by providing a buffer between established uses and the residential area with less intensive employment activities. The highways analysis that has been carried out has suggested that it would not have an adverse impact on roads and congestion. Furthermore, there are very few opportunities for businesses to expand and Three Ashes could provide this opportunity.

j) Conclusions

Following the submission of representations to the Preferred Options Core Strategy, Colonnade is disappointed to note that the CSS fails to take account of the majority of the issues raised in their representations.

In addition, Colonnade considers the plan to be 'unsound' as the document consistently fails to meet the tests of soundness set out in the table following Paragraph 4.52 of PPS12 and respectfully requests that the Council notifies Icen, on behalf of Colonnade, of the future arrangements for the Examination of the Core Strategy. Furthermore, Colonnade wishes to take this opportunity to formally register a request to appear at all stages of the Examination in Public, including the pre-hearing meeting and any planned hearing sessions whereby issues raised in the context of this letter are to be discussed. Please confirm this request, and that the representations made to the Preferred Options Core Strategy will be taken into account alongside the current representations, by way of return to this letter.

Icen Projects, on behalf of Colonnade Land LLP trusts that the Council will find these representations to be constructive and helpful in taking forward the Core Strategy. Should you wish to discuss any aspect of these representations further, please do not hesitate to contact us.

Summary:

c) Housing

i. Date of Adoption

The CSS assumes an adoption date of 2010 and plans for the provision of housing to 2025.

Taking account of the potential delays to the adoption of the Plan, including the Examination process, it would be more appropriate for the CSS to provide sufficient flexibility to allow for delays in its adoption. Colonnade considers an adoption date of 2011 for the CSS is a more realistic target.

Taking account of the advice in Paragraph 4.13 of PPS12, which states that the time horizon for the Core Strategy should be "at least 15 years from the date of adoption" it would be appropriate for the CSS to plan for the provision of housing to 2026 at the earliest. As such, Colonnade does not consider the CSS to be 'flexible' in the context of the tests of soundness in the table following Paragraph 4.52 of PPS12.

Change to Plan

Appear at exam?	Yes	Soundness Tests	i, iii
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Respondent: Mr David Dare [12098]

1, Woodstock Crescent
Hockley Essex
SS5 4XG
UK
01702 205813

Agent: N/A

Full Text: Highway & Traffic Implications

1. Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;

* (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

* EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

3. RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local

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Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

Summary:

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:

* The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

* The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

Previous consultations ignored by RDC:

The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

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Thus the proposals are not founded on a robust and credible evidence base and are unsound

7. RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

* The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

* the Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!

* The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Summary:

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

the Foundry Industrial Estate has never even been previously mentioned;

The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

9. PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

10. THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food

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shopping expenditure.

2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's

existing strengths, rather than retail expansion"

4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Summary:

PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

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Respondent: Mr D Himsley [14206]

4 Brackendale Close
Hockley
Essex
SS5 5AP

Agent: N/A

Full Text: Please find the following objections: -

10 off Unsound Reasons.
1. Highway and Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

3. RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:
The Hockley Parish Plan (dated 2007). The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

7. RDC not consulted on proposals to relocate the Eldon Way and Foundry Industrial Estates

EW; CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" absolutely no consultation on concept of moving EW businesses entirely

FIE; has never even been previously mentioned in any plan version; CS states omission was due to typing error!

Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus proposals are not founded on a robust and credible evidence base and are unsound.

8. The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

Core Strategy Submission Document

16314 Object

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There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound

9. PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies"

Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which

does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise

residents how such changes will be made and the strategy is unsound.

10. The CS misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The CS states "The R&LS states Hockley has great potential and has a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) "does not lend itself to a food store capable of retaining a significant proportion of main food shopping expenditure.
- 2) "there is no immediate capacity for additional floor space."
- 3) "recommend that focus be maintained on developing Hockley's existing strengths."
- 4) " the Council may wish to consider reclassifying Hockley from a town center, to a district center".

Summary:

PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies"

Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which

does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise

residents how such changes will be made and the strategy is unsound.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

S - 16341 - 8267 - Introduction - None

16341 Support

CHAPTER 4 Introduction

Respondent: Aber Ltd [8267]

Aber Ltd
C/o Agent

Agent: Colliers CRE (Mr S Chapman) [8266]

Colliers CRE
9 Marylebone Lane
London
W1U 1HL
020 7344 6533

Full Text: Support the fact that the Core Strategy acknowledges the need that part of the Green Belt will need to be reallocated to meet the housing requirement in the East of England Plan.

Summary: Support the fact that the Core Strategy acknowledges the need that part of the Green Belt will need to be reallocated to meet the housing requirement in the East of England Plan.

Change to Plan N/A

Appear at exam? No

Soundness Tests N/A

Core Strategy Submission Document

S - 16342 - 8267 - Introduction - None

16342 Support

CHAPTER 4 Introduction

Respondent: Aber Ltd [8267]

Aber Ltd
C/o Agent

Agent: Colliers CRE (Mr S Chapman) [8266]

Colliers CRE
9 Marylebone Lane
London
W1U 1HL
020 7344 6533

Full Text: Support the approach to sustainable development and focussing housing development in the higher tier settlements, with a proportion of the new housing in the lower tier settlements.

Summary: Support the approach to sustainable development and focussing housing development in the higher tier settlements, with a proportion of the new housing in the lower tier settlements.

Change to Plan N/A

Appear at exam? No

Soundness Tests N/A

Core Strategy Submission Document

O - 15875 - 8000 - Introduction, 4.3 - i, ii

15875 Object

CHAPTER 4 Introduction, 4.3

Respondent: Mr Michael Hollis [8000]

63 Hambro Avenue
Rayleigh
Essex
SS6 9NJ

Agent: N/A

Full Text: Rayleigh is already over populated. The plan to use further farmland in the Rawreth area is unsound. The infrastructure cannot cope with the existing population and building here would put unsustainable pressure on Rayleigh's roads and amenities. Further building would bring the existing infrastructure to breaking point. Existing countryside must be protected for current and future generations of Rayleigh's residents. If it is built on now there is no turning that back, leaving little or no greenfield for our children and their children to appreciate and enjoy.

Summary: Rayleigh is already over populated. The plan to use further farmland in the Rawreth area is unsound. The infrastructure cannot cope with the existing population and building here would put unsustainable pressure on Rayleigh's roads and amenities. Further building would bring the existing infrastructure to breaking point. Existing countryside must be protected for current and future generations of Rayleigh's residents. If it is built on now there is no turning that back, leaving little or no greenfield for our children and their children to appreciate and enjoy.

Change to Plan Use of other browfield sites

Appear at exam? No **Soundness Tests** i, ii

Core Strategy Submission Document

O - 16010 - 14146 - Introduction, 4.4 - i, ii, iii

16010 Object

CHAPTER 4 Introduction, 4.4

Respondent: Mr H Snell [14146]

Greensleeves
57 High Road
Hockley

SS5 4SZ

Agent: Capita Symonds (Mr David Spencer) [14145]

Capita Symonds
Elizabeth House
Walpole Loke
Dereham
Norfolk
NR19 1EE
England
01362656889

Full Text: The plan at present has proposed allocations to 2025 (a 15 year period following adoption in 2010). This is unsound as PPS3 requires a minimum 15 year housing land supply from the adoption of the Core Strategy. The LDS on the Council's website is out of date and it is unclear when the Council intends to adopt the Core Strategy for the purposes of a 15 year supply. For 2010 to be a reasonable date for determining a 15 year supply, the Plan will need to be adopted by 31st March 2010, which is not feasible.

Summary: The plan at present has proposed allocations to 2025 (a 15 year period following adoption in 2010). This is unsound as PPS3 requires a minimum 15 year housing land supply from the adoption of the Core Strategy. The LDS on the Council's website is out of date and it is unclear when the Council intends to adopt the Core Strategy for the purposes of a 15 year supply. For 2010 to be a reasonable date for determining a 15 year supply, the Plan will need to be adopted by 31st March 2010, which is not feasible.

Change to Plan The plan at present has proposed allocations to 2025 (a 15 year period following adoption in 2010). This is unsound as PPS3 requires a minimum 15 year housing land supply from the adoption of the Core Strategy. The LDS on the Council's website is out of date and it is unclear when the Council intends to adopt the Core Strategy for the purposes of a 15 year supply. For 2010 to be a reasonable date for determining a 15 year supply, the Plan will need to be adopted by 31st March 2010. This appears to be infeasible. The absence of a minimum 15 year housing land supply adversely affects the document's effectiveness, in particular the flexibility needed to deliver sufficient housing to meet the District's housing need. The principal reason for opting for such a tight housing land supply appears to be resistance from local communities. However, an extension of the plan period to 2026 would result in only an additional 250 units. Rolling the housing land supply to 2026 would ensure consistency with Policy H1 of the adopted RSS. There are sustainable options within the top tier of settlements to accommodate the additional housing numbers. The Plan should be amended to look ahead to 2026 to be consistent with RSS Policy H1 and national policy in PPS3. Extending the plan to 2026 would require Rochford to allocate land for a further 250 units, bringing the District total to 4,850. Sustainable options exist to accommodate this additional requirement (i.e. west of Hockley).

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

S - 15887 - 14113 - Introduction, 4.6 - None

15887 Support

CHAPTER 4 Introduction, 4.6

Respondent: Sanctuary housing association (Miss Sarah Brind) **Agent:** N/A
[14113]

Sanctuary housing association
Collier House
Mead Lane
Hertford
SG13 7UZ
01992 513441

Full Text: The document correctly identifies the miss-match between housing targets set in the regional plan and local provision within developed areas of Rochford. There is pressure on the green belt as a result, and some relaxation should be sought

Summary: The document correctly identifies the miss-match between housing targets set in the regional plan and local provision within developed areas of Rochford. There is pressure on the green belt as a result, and some relaxation should be sought

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 15968 - 13441 - Introduction, 4.6 - None

15968 Support

CHAPTER 4 Introduction, 4.6

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: Green Belt reallocations should follow advice in PPG2. The Green Belt Vision is explained, clearly, at Section 6.

Summary: Green Belt reallocations should follow advice in PPG2. The Green Belt Vision is explained, clearly, at Section 6.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16036 - 9599 - Introduction, 4.6 - i, ii

16036 Object

CHAPTER 4 Introduction, 4.6

Respondent: Mrs Fiona Jury [9599]

WGDP Ltd
Cross Keys House
22 Queen Street
Salisbury
SP1 3EY

Agent: N/A

Full Text: The housing trajectory includes provision for sites identified in the SHLAA to come forward in the period from 2006 to 2015. Approximately 50% of dwellings to be delivered from this source, comprise existing employment sites that have been identified for redevelopment, which would contribute a total of 325 dwellings. On closer examination of these sites, which are the subject of separate representations to Policy ED3, they would not appear to be entirely deliverable. Their inclusion has not been founded on a robust or credible evidence base, and is therefore unjustified.

Summary: The housing trajectory includes provision for sites identified in the SHLAA to come forward in the period from 2006 to 2015. Approximately 50% of dwellings to be delivered from this source, comprise existing employment sites that have been identified for redevelopment, which would contribute a total of 325 dwellings. On closer examination of these sites, which are the subject of separate representations to Policy ED3, they would not appear to be entirely deliverable. Their inclusion has not been founded on a robust or credible evidence base, and is therefore unjustified.

Change to Plan The proposed supply of housing land derived from the SHLAA 2009 is flawed by virtue of the inclusion of existing employment sites that are undeliverable during the time period proposed. On this basis, the DPD fails the test of soundness. In order to make the DPD sound, sites which are 'available' and 'suitable' need to be included in the housing trajectory to replace this source, this is likely to require an earlier Green Belt release. Additional sites within the Green Belt in sustainable locations for housing need to be identified

Appear at exam? Yes

Soundness Tests i, ii

Core Strategy Submission Document

S - 16099 - 14107 - Introduction, 4.6 - None

16099 Support

CHAPTER 4 Introduction, 4.6

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: In the absence of the SHLAA, (which has not yet been published), the Chamber supports minimum development of the green belt. Every effort must be made to identify brown field sites. It is felt that the allocation of the number of dwellings proposed for the settlement of Rochford is disproportionately high compared to that of other major settlements, i.e. Rayleigh/Hockley/Hawkwell. Access to parts of the green belt would be advantageous, promoting a more healthy lifestyle.

Summary: In the absence of the SHLAA, (which has not yet been published), the Chamber supports minimum development of the green belt. Every effort must be made to identify brown field sites. It is felt that the allocation of the number of dwellings proposed for the settlement of Rochford is disproportionately high compared to that of other major settlements, i.e. Rayleigh/Hockley/Hawkwell. Access to parts of the green belt would be advantageous, promoting a more healthy lifestyle.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16247 - 9177 - Introduction, 4.6 - i

16247 Object

CHAPTER 4 Introduction, 4.6

Respondent: Colonnade Land LLP [9177]

Colonnade Land LLP
Fifth Floor
17-19 Maddox Street
London
W15 2QH
020 7255 7490

Agent: Icen Projects Limited (David Churchill) [10057]

Icen Projects Limited
83 Victoria Street
London
SJ1H 0HW

Full Text: ROCHFORD DISTRICT COUNCIL - LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY SUBMISSION
SEPTEMBER 2009

Icen Projects Ltd (Icen) has been instructed by Colonnade Land LLP (Colonnade) to submit representations to the Rochford Local Development Framework Core Strategy Submission (CSS).

a) Overview

It is our conclusion that the CSS is not justified, effective or consistent with national policy, as required by Planning Policy Statement 12: Creating Strong Safe and Prosperous Communities through Local Spatial Planning (PPS12) and is therefore vulnerable to being found unsound by an Inspector through the Examination in Public.

b) Background and Summary

These representations follow those made by Icen on behalf of Colonnade to the Preferred Options Core Strategy, submitted via letter dated 17 December 2008. In this regard, we would request that the Council confirms that the representations made to the Preferred Options Core Strategy will be taken into account alongside the current representations, particularly as there are a number of cross references between the two sets of representations.

It is not considered necessary to reiterate the content of the previous representations, as they were made at the appropriate stage and will be considered by the Planning Inspectorate in due course, but it is inevitable that certain elements will require restating where it is not clear that they have been taken into account in the production of the CSS. For clarity, therefore, Colonnade feel that it is appropriate to clarify the 'in-principle' issues that were raised in the representations to the Preferred Options Core Strategy, recognising that these issues were raised in the context of a wider and more coherent justification made within the representations:

- â€¢ Further cross-referencing of the recommendations made within the evidence base is required;
- â€¢ Greater focus should be placed on promoting Rochford as the principal settlement within the District;
- â€¢ Coombes Farm is the most logical location for residential development abutting the urban area of Rochford and as such warrants recognition as a general location for residential development;
- â€¢ The allocation of Three Ashes Farm for employment generating uses will be pursued;
- â€¢ Recognition that it is not realistic to expect residential allocations to be met mainly on Brownfield sites, nor should the intensification of smaller sites in residential areas be pursued;
- â€¢ Many of the sites identified as suitable for residential development will not be viable and will not come forward for development within the timescales anticipated;
- â€¢ The failure to provide the necessary justification for the proposed infrastructure improvements sought in Appendix H1;
- â€¢ The inclusion of an affordable housing exception policy was sought; and
- â€¢ The need to identify sites capable of delivering employment growth in the short term.

Following assessment of the CSS presented by the Council for consultation prior to submission to the Secretary of State, Colonnade considers the Plan to be 'unsound' as the document consistently fails to meet the tests of soundness set out in the table following Paragraph 4.52 of PPS12. For clarity, PPS12 confirms that to be 'sound' a Core Strategy should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY and defines 'justified' as "founded on a robust and credible evidence base" and "the most appropriate strategy when considered against the reasonable alternatives" and 'effective' as "deliverable", "flexible" and "able to be monitored".

The rationale for the above is identified in the remainder of these representations, which are provided in the interests of ensuring the Council delivers a strong, robust and logical Core Strategy that guides the future development of the District in a justified and effective manner.

b) Colonnade

As the Council is aware from previous submissions to the Local Development Framework, Colonnade is a strategic land company with a particular interest in the future development of the District as a consequence of a number of sites that it controls, particularly around Rochford.

The Council will also be aware that Colonnade has recently submitted an outline planning application for the residential development of the land at Coombes Farm, Rochford to provide a sustainable urban extension comprising up to 326

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residential dwellings, with associated accesses and community uses. Whilst the planning application process is clearly separate from the Local Development Framework production process, Colonnade wishes to continue the promotion of the site as a suitable location for residential development.

Accordingly, these representations focus on the legal requirements and tests of soundness associated principally with the Housing and Employment chapters of the CSS, with reference where appropriate to the sites that are controlled by Colonnade, the outline planning application at Coombes Farm and other issues where relevant.

c) Housing

i. Date of Adoption

The CSS assumes an adoption date of 2010 and plans for the provision of housing to 2025.

Taking account of the potential delays to the adoption of the Plan, including the Examination process, it would be more appropriate for the CSS to provide sufficient flexibility to allow for delays in its adoption. Colonnade considers an adoption date of 2011 for the CSS is a more realistic target.

Taking account of the advice in Paragraph 4.13 of PPS12, which states that the time horizon for the Core Strategy should be "at least 15 years from the date of adoption" it would be appropriate for the CSS to plan for the provision of housing to 2026 at the earliest. As such, Colonnade does not consider the CSS to be 'flexible' in the context of the tests of soundness in the table following Paragraph 4.52 of PPS12.

ii. Housing Delivery

However, setting the above aside, the Housing Chapter identifies the minimum housing delivery target for the period 2001 to 2021 of 4,600 dwellings as set out in the East of England Plan, with the annual average requirement of 250 dwellings per annum to extend provision from 2021 to 2025. It also confirms that the residual target for the period 2006 to 2021 is 3,790 dwellings, taking account of the delivery of 810 dwellings in the period 2001 to 2006, and a further 618 dwellings have been completed between 2006 and 2008.

This leaves a residual housing provision target of a minimum of 3,172 dwellings in the period 2008 to 2021. Taking into account the required provision beyond 2021, the residual housing provision target in the period 2008 to 2025 is a minimum of 4,172 dwellings. The disparity between these figures and those provided within the CSS are explained by the rounding down of the annual average delivery requirement in the period 2006 to 2021 to 250 dwellings per annum, compared with the actual figure of 252.67.

The table at Paragraph 4.6 of the CSS identifies the source of housing provision that will meet the identified minimum requirements and includes figures for 'Extant Planning Permissions' and 'Existing allocations/other appropriate sites identified in Strategic Housing Land Availability Assessment'. These figures, along with the actual completions within the period are combined to produce the figure for the 'Total without Green Belt release' figure.

Setting aside the concern regarding under-provision associated with the rounding down of the annual average delivery requirement in the period 2006 to 2021, the CSS fails to identify the sites that will contribute to the 'Extant Planning Permissions' provision. The identification of the sites that will contribute to the 'Extant Planning Permissions' should be provided in the context of the findings of the Inspector in the appeal by Asprey Homes [APP/G5180/A/07/2043219/NWF] who determined that the reliance on a delivery rate of 100% is unsafe [IR287].

Furthermore, at the time of writing these representations, the Strategic Housing Land Availability Assessment 2009 has not been published. It is impossible therefore for a full assessment of the proposed housing provision to be undertaken to confirm whether the CSS is 'founded on a robust and credible evidence base' [test of soundness in the table following Paragraph 4.52 of PPS12].

iii. Redevelopment of Employment Sites

Paragraph 4.14 of the CSS refers to the identification of the four employment sites that are considered by the Council to be suitable for redevelopment to residential use. However, the failure to publish the Strategic Housing Land Availability Assessment 2009 either before or alongside the publication of the CSS means that the assumptions made by the Council as to the suitability, availability, viability and deliverability of the sites cannot be assessed.

It has been necessary, therefore, to review the assumptions made in the Rochford Urban Capacity Study 2007 (UCS) regarding the sites. Within the section of the UCS entitled 'Redevelopment of Established Employment Land' [pages 22 & 23] includes a list of those sites assessed, their indicative capacities and the probability of residential development coming forward at the sites within the plan period (identified elsewhere as 2001 - 2021). The list includes the four sites identified in the CSS of Eldon Way/Foundry Estate, Hockley; Rawreth Lane Industrial Estate, Rayleigh; Stambridge Mills; and Star Lane Industrial Estate, Great Wakering.

In total, the UCS identifies an indicative residential redevelopment capacity of 486 units on the four sites (118, 220, 60 and 88 respectively). Of these, it identifies the Rawreth Lane Industrial Estate and Stambridge Mills as having a 'high'

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probability of coming forward for development in the Plan period (2001 - 2021), which would deliver 280 residential dwellings using the Council's own figures. The Star Lane Industrial Estate (referred to in the UCS as the Star Lane Brickworks) is identified as having a 'medium' probability of coming forward for development in the Plan period, with capacity to deliver 88 residential dwellings. It is unclear, therefore, where the figure for 'Existing allocations/other appropriate sites identified in Strategic Housing Land Availability Assessment'.

Set against this is the identification of these four sites in the CSS as being capable of delivery for residential development within the Plan period, with 671 units delivered between 2006 and 2015 and a further 506 units between 2015 and 2021.

The UCS also states in the same section that:

"There are considerable areas of land in the district that are currently allocated for, and in use as, employment land. The redevelopment of such sites for residential use would reduce demand for residential development on greenfield sites, but would at the same time create a need for alternative sites to be found for employment. Such an approach, which would be likely to require the decontamination of existing employment land to make it fit for residential use, together with development of a greenfield site and implementation of additional infrastructure to serve the new employment area, may well be unsustainable." [our emphasis]

The UCS appears to confirm therefore, that not only would the redevelopment of the four sites listed in the CSS be unlikely within the Plan period, but also potentially unsustainable. In this regard, it is notable that the promoters of Stambridge Mills sought the Screening Opinion of the Council as to whether Environmental Impact Assessment of the planning application for the redevelopment of the site for residential use was required in 2007, but to date are yet to submit a planning application for the redevelopment of the site.

In light of this, Colonnade does not consider the CSS is 'the most appropriate strategy when considered against the reasonable alternatives' [test of soundness in the table following Paragraph 4.52 of PPS12], which include the provision of residential development in East Rochford.

iv. Strategic Housing Growth to the East of Rochford

Furthermore, whilst paragraph 2.62 of the CSS identifies concern relating to the identification of locations to the east of Rochford for development on the basis that 'vehicular movements would inevitably be directed through Rochford's historic core', the CSS later identifies Stambridge Mills as a suitable site for residential redevelopment.

In light of the evident conflicts between the evidence base provided in support of the CSS and the absence of other evidence, the CSS is not considered 'sound' in the context of the tests of soundness in the table following Paragraph 4.52 of PPS12.

v. Housing Trajectory

Paragraph 4.28 of the CSS confirms that policies H1, H2 and H3 of the CSS will deliver housing supply as illustrated in the Housing Trajectory at Appendix H2. This Housing Trajectory is transposed from the 2008 Annual Monitoring Report (AMR).

Whilst on the face of it, the Housing Trajectory appears to confirm that the Council can meet its requirement to identify a five year housing supply, many of the sites identified within the AMR do not conform to the guidance issued by CLG in August 2008, on the assessment of a five year land supply. The guidance identifies sites that can be included within the five year assessment of housing supply as:

"those that are allocated for housing in the Development Plan, sites that have planning permission (outline or full planning permission that has not been implemented) and specific, unallocated brownfield sites that have the potential to make a significant contribution to housing delivery during the 5 year period".

Table 4.10: Projected Net Completions of the AMR confirms that the five year housing land supply figure includes sites from 'other land allocated for residential purposes', which are based on land allocations outside existing settlements. However, it should be clarified that these land allocations are not currently allocated for housing development in an adopted Development Plan. As such, these unallocated greenfield sites that are yet to make significant progress through the planning system should be discounted and the five year housing land supply recalculated.

The table below has been prepared to confirm the extent of the shortfall should the sites from 'other land allocated for residential purposes' be removed from the calculation of the Rochford five year housing land supply, in accordance with the guidance issued by CLG:

Recalculated Five Year Housing Land Supply (2009 - 2014):

Year
1st April 2009 to 31st March 2010
Predicted Delivery (A)

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106 dwellings
Allocations on 'other land allocated for residential purposes' (B)
0
Residual delivery (A-B)
106 dwellings
Delivery Shortfall
0

Year
1st April 2010 to 31st March 2011
Predicted Delivery (A)
217 dwellings
Allocations on 'other land allocated for residential purposes' (B)
150
Residual delivery (A-B)
67 dwellings
Delivery Shortfall
150

Year
1st April 2011 to 31st March 2012
Predicted Delivery (A)
544 dwellings
Allocations on 'other land allocated for residential purposes' (B)
300
Residual delivery (A-B)
244 dwellings
Delivery Shortfall
300

Year
1st April 2012 to 31st March 2013
Predicted Delivery (A)
395 dwellings
Allocations on 'other land allocated for residential purposes' (B)
375
Residual delivery (A-B)
20 dwellings
Delivery Shortfall
375

Year
1st April 2013 to 31st March 2014
Predicted Delivery (A)
300 dwellings
Allocations on 'other land allocated for residential purposes' (B)
300
Residual delivery (A-B)
0 dwellings
Delivery Shortfall
300

TOTAL

Predicted Delivery (A)
1,562 dwellings

Allocations on 'other land allocated for residential purposes' (B)
1,125 dwellings

Residual delivery (A-B)
437 dwellings

Delivery Shortfall
1,125 dwellings

The above table confirms that the removal of the 'other land allocated for residential purposes' from the calculation of the Rochford five year housing land supply leaves the Council with a minimum net additional housing delivery of 437 dwellings, which equates to a supply of 1.7 years based on the adjusted annual delivery target of a minimum of 255 net

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additional dwellings per annum. As such, the Council is failing to meet its requirement to demonstrate a five year housing land supply in accordance with PPS3 and the supporting guidance provided by CLG. It is notable that the recent application by David Wilson Homes at Land between Main Road and Rectory Road and Clements Hall Way, Hawkwell identifies an even greater shortfall in the Council's five year housing land supply.

In addition to the above, the AMR does not include a commentary on how deliverability has been assessed against the requirements of paragraph 54 of PPS3.

Furthermore, the guidance from CLG confirms that the windfall sites cannot be relied upon in demonstrating a five year supply unless a Local Planning Authority can demonstrate genuine local circumstances exist to allow this exception. However, the second paragraph of the section entitled 'Housing Trajectory and Five Year Housing Supply' confirms that the estimated completions in the years 2008 to 2013 includes estimated yields through 'intensification' coming forward in future years. With reference to the definition of 'intensification' on page 13 of the AMR, it appears that the 'Housing Trajectory and Five Year Housing Supply' also includes provision for windfall sites. As such, the Council is required to demonstrate the 'genuine local circumstances exist to allow this exception'.

The pressures on delivery and need for additional sites are more acute when it is considered that an average delivery rate of 204 dwellings per annum was achieved during a strong period of housing market growth. In view of the current economic downturn, and significant problems faced within the housing market, the Council should seek to identify appropriate and deliverable sites to meet its regional housing target provision commitments. Suitable sites would include Coombes Farm, which has been positively promoted for development through the LDF process.

It may, therefore, be more appropriate for the Council not merely to allocate sufficient sites to meet the minimum targets set down by the East of England Plan, but to identify a reservoir of land capable of coming forward for development should the sites identified through the CSS and Allocations Development Plan Documents (DPD) fail to come forward for development within the anticipated timescales.

vi. Appendix H1

As set out in the representations to the Preferred Options Core Strategy, there is continuing concern that the list of improvements to infrastructure required in support of residential development as set out in Appendix H1 fails to provide the necessary justification for its inclusion. Whilst the preamble seeks to clarify why the infrastructure is sought, the inclusion of this list should be fully justified, otherwise it is of little value. Furthermore, it would be of benefit to provide further details of the existing community infrastructure provision and capacity within the evidence base.

The failure to provide the necessary justification for its inclusion means that the CSS will not be 'founded on a robust and credible evidence base' [test of soundness in the table following Paragraph 4.52 of PPS12].

d) Character of Place

As set out in the representations to the Preferred Options Core Strategy, Colonnade considers that, with respect to the requirement to produce and adhere to Development Briefs for large residential developments, as set out in Policy CP1, the Council should not seek to impose further demands on developers where existing regulations provide sufficient requirements regarding design. In this instance, Design and Access Statements provide sufficient design guidelines for developments and there is no additional information provided in the policy or supporting text that clearly sets out the justification for this requirement.

e) Green Belt

With reference to the comments regarding the redevelopment of employment sites under the 'Housing' section above and the requirement to allocate sufficient land to meet the minimum housing provision targets as required by the East of England Plan, Colonnade considers that the chapter on Green Belt, and policy GB1 in particular, fails to provide the necessary evidence base that will allow it to be monitored effectively.

It is inherent that the proposed redevelopment of previously developed employment sites for residential use in order to reduce the requirement to allocate previously undeveloped land for residential use will displace these employment uses. In turn, therefore, the separate allocation of previously undeveloped Green Belt to accommodate the compensatory employment provision is required. This is accepted in principle at paragraph 11.11 of the CSS.

Without providing clarification of the anticipated quantum of land required to accommodate the provision of housing and compensatory and new employment land, it is not possible to monitor the performance of policy GB1.

However, using the Council's figures in the table setting out the breakdown of the housing provision figures in Chapter 4 of the CSS (assuming that actual completions and extant permissions are all on previously developed land), setting aside the displacement of employment uses referred to above, approximately 42% of the required minimum housing provision target is capable of being accommodated on previously developed land (2,005 units from a total of 4,750). As such, the Council is required to provide at least 58% of the required minimum housing provision target on the Green Belt (2,745 units from a total of 4,750).

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If these figures are adjusted to take account of the displacement of employment uses (assuming the provision of an equal quantity of land is required to compensate for the employment land that is redeveloped), this figure changes to 17.5% on previously developed land and 82.5% on Green Belt (828 and 3,922 units from a total of 4,750 respectively). Even allowing for the achievement of higher densities of employment on new developments, the figures above are unlikely to change significantly.

Furthermore, the table in Chapter 4 also confirms that no previously developed land will be available for development beyond 2021, or 2015 if account is taken of the displacement of the employment uses.

In light of this, not only does Chapter 6 fail to provide the necessary evidence base that will allow it to be monitored effectively, it is also necessary to consider whether it presents the most appropriate strategy for addressing the required release of Green Belt land to accommodate the defined housing and employment delivery targets to 2025 and beyond as necessary. Colonnade considers a more robust approach that is flexible and capable of being monitored, would be to clearly identify those sites capable of delivery in the short term, which for the avoidance of doubt includes those sites being promoted by Colonnade, with a reservoir of alternative sites set aside for future growth.

As set out in the representations to the Preferred Options Core Strategy, Colonnade considers that the inclusion of an affordable housing exception policy within the CSS will aid the delivery of community housing within rural areas. However, the CSS does not contain such a policy, or adequately address the issue of community housing within rural areas and the CSS is not considered to provide sufficient flexibility to allow for the delivery of essential rural housing.

f) Environmental Issues

Colonnade has concerns regarding the justification for and effectiveness of a number of the policies contained within the Environmental Issues chapter, as follows:

â€¢ Policy ENV1: The Council fails to identify how it will "maintain, restore and enhance" the sites of nature conservation importance that are identified, or how the performance of this policy will be monitored;

â€¢ Policy ENV3: In the context of the advice at paragraph 4.32 of PPS12 regarding the reformulation of national policies, Colonnade does not consider that this policy is required; and

â€¢ Policy ENV9: As set out in the representations to the Preferred Options Core Strategy, Colonnade does not consider that the necessary evidence base has been provided to justify a policy that seeks to go above and beyond the policy targets for the Code for Sustainable Homes as set out by Central Government.

g) Community Infrastructure, Leisure and Tourism

Policy CLT1 refers to the requirement for residential and employment development to contribute to the infrastructure identified in Appendix CLT1 through Standard Charges.

However, whilst the general principle of securing planning obligations through the application of standard charges is broadly accepted, the list of infrastructure requirements set out in Appendix CLT1 is not supported by sufficient evidence base to identify its robustness and credibility. As such, Colonnade does not consider either policy CLT1 or Appendix CLT1 is justified in the context of PPS12.

It is also noted that, despite the clarification sought by Colonnade at the Core Strategy Preferred Options stage, the CSS fails to confirm what information should be contained within Health Impact Assessments, which are required by policy CLT4. Once again, Colonnade requests further clarification of what is involved in the assessment and the expected outputs, which will provide greater clarity and will allow the policy to be monitored.

h) Transport

Policy T8 confirms that the Council will apply minimum parking standards. As set out in the representations to the Preferred Options Core Strategy, the guidance in Planning Policy Guidance Note 13: Transport (PPG13) is clear regarding the imposition of parking standards.

Paragraphs 52-56 of PPG13 confirm that the Local Planning Authorities should apply maximum not minimum parking standards. In order to satisfy the legal requirements set out in PPS12, the policy must reflect PPG13 to promote sustainable transport choices and further provide incentives for developers to locate further residential land closer to local service centres by requiring maximum parking standards for residential developments.

i) Economic Development

As set out in the representations to the Preferred Options Core Strategy, the land at Three Ashes Farm provides an excellent opportunity to deliver employment growth in the short term and may be a suitable site for the 'Eco-Innovation Centre' that is being promoted by the Council. Its identification as a suitable location for strategic employment growth, or the provision of an Eco-Innovation Centre, would accord with the general principles of the policies contained within Chapter 11.

Core Strategy Submission Document

S - 16869 - 14274 - Introduction, 4.6 - None

16869 Support

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Respondent: Knight Developments [14274]

Knight Developments
C/o agent

Mr T Dodkins
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Agent: Strutt & Parker (Mr Trevor Dodkins) [8117]

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Full Text:

See accompanying Strutt & Parker Planning Document and Cannon Consulting Initial Highways Access and Accessibility Statement.

(Council ref AE27 and AE27a)

Representation submitted in relation to proposed allocation of housing to the south west of Rayleigh and attendance required at examination to support the allocation of this site which is not in the submission document (see other responses to core strategy).

Summary:

See accompanying Strutt & Parker Planning Document and Cannon Consulting Initial Highways Access and Accessibility Statement.

(Council ref AE27 and AE27a)

Change to Plan N/A

Appear at exam? Yes

Soundness Tests N/A

Core Strategy Submission Document

S - 16899 - 14275 - Introduction, 4.6 - None

16899 Support

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Respondent: Southern and Regional Developments Ltd [14275] **Agent:** Strutt & Parker (Mr Trevor Dodkins) [8117]

Southern and Regional Developments Ltd
Unknown - represented by

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Full Text: See accompanying Strutt and Parker Planning Document, Cannon Consulting Transport Assessment and Flood Risk, Drainage and Services Report.

Council Ref AE29, AE29a and AE29b.

Representation submitted in relation to proposed allocation of housing to the south west of Hullbridge. Attendance at examination to support this allocation.

Summary: See accompanying Strutt and Parker Planning Document, Cannon Consulting Transport Assessment and Flood Risk, Drainage and Services Report.

Council Ref AE29, AE29a and AE29b.

Change to Plan N/A

Appear at exam? Yes **Soundness Tests** N/A

Core Strategy Submission Document

O - 16913 - 10009 - Introduction, 4.6 - i

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Respondent: Barratt Eastern Counties [10009]

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Agent: Kember Loudon Williams Ltd (Mr Martin Hull) [8466]

Kember Loudon Williams Ltd
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Full Text: Local Development Framework

Representations on the Core Strategy
Submission Document, November 2009
On behalf of Barratts Eastern Counties

Introduction

The requirements of Core Strategies are enshrined in the 2004 Planning and Compensation Act, the Town & Country Planning (Local Development) England (Regulations) 2004 and the 2008 policy guidance in PPS12. The requirements of Coe Strategies are clear. And they are legal requirements. The Core Strategy must comply with the Local Development Scheme, Statement of Community Involvement and the Regulations. The Core Strategy must be subject to a sustainability appraisal, have regard to national guidance, conform generally with the Regional Spatial Strategy and have regard to any Sustainable Community Strategy. A Core strategy must be sound - justified, effective and consistent with national policy. The following representations therefore focus on these legal requirements.

HOUSING

Paragraph 4.6 - Evidence Base

To meet the soundness test Submission Core Strategies (SCS) must be justified, that is to say it must be founded on robust and credible evidence base and comprise the most appropriate strategy when considered against reasonable alternatives. The housing strategy in as far as it identifies a need for Green belt sites is sound, however, there are other elements which are unsound.

Paragraph 4.6 notes that the Strategic Housing Land Availability Assessment (SHLAA) has examined the supply of housing. It is presumed that the Table at paragraph 4.6 is the outcome of this examination. Whilst the SHLAA has some legitimacy in that it identifies various sites that are apparently available, we are concerned that because the SHLAA was only published in November 2009 it post dates the SCS. This implies that the SCS is driving the SHLAA exercise rather than the other way round. Whilst this may have no real practical effect on the outcome of the SCS and the identified need for Green Belt sites, the Inspector will be mindful of the advice in paragraphs 33 and 54 of PPS3 that SCS draw on the evidence in SHLAA. It may be that the SCS should explain how the evidence base has been used to justify the strategy.

PPS12 explains at paragraph 4.37 that Core Strategies are based on thorough evidence. Since the SHLAA has only recently been published it is considered that the SCS is unsound as it is not justifiable. This, together with other comments on the SCS, indicates that the process should be delayed to ensure that a more robust document is placed in front of the EiP Inspector.

Table at Paragraph 4.6 - Evidence base

From our review of the available evidence it would appear that the housing land supply is insufficient and that Green Belt release are required. From the wider strategy being promoted we note that some of the sites that the District Council consider to be 'appropriate' are likely to relate to existing employment areas. As set out elsewhere in our representations, we maintain severe reservations that the redevelopment of existing employment sites for alternative uses and particularly the Eldon Way Industrial Estate is unsustainable. We will make reference to the effectiveness of this strategy in relation to sustainability, whether it is justified in the context of National Policy and the deliverability of such a strategy elsewhere.

In particular, paragraph 11.32 of the SCS refers to existing employment land and sites within the UCS. It does not refer the SHLAA and as such it appears that an evidence base to support the re-use of employment land for residential is not reported in the SCS.

Having reviewed the 2008 Annual Monitoring Report, as we did when commenting on the 2008 Preferred Options Core Strategy, we maintain severe doubts as to the appropriateness of some of the previously developed sites identified as potential housing sites and their expected housing yield. Whilst we cannot at this stage ascertain whether the SHLAA

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sites referred to in this table correlate with the Annual Monitoring Report and indeed the 2007 Urban Capacity Study, it is our view that there will be some commonality and so the reliance on these sites is likely to be at odds with Government Policy. We shall elaborate on this objection in relation to the specific housing policy below.

We note that the last two rows in the Table at paragraph 4.6 set out figures with and without Green Belt releases. The text to this section of the Core Strategy should, for reasons of clarity, explain that Green belt review will be necessary in order to deliver the required housing.

Paragraph 4.9

The table on page 40, which sets out the settlement tiers, is supported. Rayleigh, Rochford/Ashingdon, Hockley/Hawkwell are clearly the largest settlements in the District and they benefit from good employment, housing, leisure, community and public transport provision. These settlements are the most sustainable ones with the greatest mix of uses. Consequently, it is sensible that the Core Strategy identifies these as top tier settlements and is able to target them with growth accordingly. This component of the strategy is justified by reference to sustainability data and is effective, since targeting development at these locations will ensure a more sustainable pattern of development.

Paragraph 4.14

We maintain that the strategy for redeveloping the Eldon Way Industrial Estate for housing and other alternative uses to employment is unsound. It is neither justified nor effective. The Industrial Land Availability Study 2006 sets out on page 7 strategic objectives. The 3rd objective seeks to Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive. Clearly the strategy as currently drafted envisages major changes to existing industrial estates, including alternative uses. This strategy is not consistent with other strategies and evidence based studies and so cannot be justified in the context of the tests set out in PPS12. It is also an ineffective strategy since the new employment locations that would free up the Eldon Way site for redevelopment relies on transport infrastructure that has no certainty of being delivered. Principally, the erosion of employment uses at Eldon Way could make the settlement of Hockley/Hawkwell less sustainable and thus conflict with the tiered approach on page 40, paragraph 4.9.

Policy H1

Prioritising the use of previously developed land ("pdl") is supported in principle. It is a justified strategy in the context of PPS3 and effective as sequential choices can be made by implementing the policy. However, the District Council is also promoting a strategy which seeks the redevelopment of existing employment locations to alternative uses and by consequence is identifying green field sites for new employment development elsewhere (Policy ED4 refers). This 'land swapping' is not considered consistent with PPS3, nor is it considered to be justified or effective in delivering the desired strategy. This is particularly the case as most of the existing employment sites are occupied and therefore unavailable for redevelopment. In addition, the new Greenfield sites are in an arguably less sustainable locations away from the top tier settlements identified on page 40 of the Submission Core Strategy. Clearly this element of the strategy is inconsistent with the wider strategy.

The Industrial Land Availability Study 2006 is included as an evidence base by the District Council. It includes an introductory section, which explains that the authority wishes to make Rochford the place of choice for new business. It includes several strategic objectives on page 7 including "Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive." It reviews existing employment areas and identifies vacant land, including land available from allocations. It does not include any assessment of new sites or potential opportunities for new sites that might have been expected to feed into the Core Strategy. The strategy for identifying Green Belt site employment allocation does not appear to be based on any evidence in this document and in that context cannot be justified. The strategy being promoted potentially conflicts with Government policy in PPG13, PPG2 and emerging PPS4.

The Employment Land Study 2008 is a much later document. It has a key recommendation on page ii "we recommend that Rochford District Council adopts strong policies to protect existing employment land." Furthermore under recommendations for existing sites on page iii-iv of that document it states "In our view, Hockley Trading Centre is a strategically well placed employment location. However, we recognise the ambitions of the Hockley Town Centre masterplan and that within this the Council should consider it to be allocated for other uses. However, we recommend that this reallocation happen only if provision is made within the masterplan for office use within Hockley Town Centre as part of a mixed use scheme." The view of the writers of this document is clear - the Eldon Way Industrial estate (Hockley Trading Centre) is a good employment site and that it is for other reasons that alternative uses are being considered and only then if office development is supported. This supports our representations that new future uses at the Eldon Way site should be employment dominated and that alternative uses should relate to the objectives of the Town Centre which is to enhance the shopping and leisure facilities. Residential is not an appropriate alternative.

This document recommends the use of land to the west of Rayleigh for employment and envisages Green belt release. However, the SCS does not explain through the evidence base why existing employment sites should be 'deallocated' and Green belt land unnecessarily used.

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In addition to these key issues we have some specific concerns. As a consequence we maintain an objection to the second paragraph of Policy H1. This policy states that the Council will seek the redevelopment of various industrial estates including Eldon Way. The Policy says that alternative uses will be sought (presumably alternative to the existing employment offer) and that new land will be allocated elsewhere. This policy statement, in relation to Eldon Way in particular, is unsound for a number of reasons:

The emerging Hockley Area Action Plan consulted upon in 2008 states that the Eldon Way Industrial Estate is strategically well placed. In a sense this statement underplays the true importance of this highly sustainable employment location and only major employment area in Hockley/Hawkwell. The employment area is adjacent to the railway station and located a short distance from the main bus routes that run along Spa Road. Some of the residential areas of the town are also within walking distance of this commercial area, thus providing a potential for sustainable travel by employees. The Eldon Way Industrial Estate is therefore right at the heart of the settlement of Hockley/Hawkwell and provides an opportunity to meet sustainable transport objectives by reducing the need to travel by car. Consequently, this employment area should be highlighted as a premier employment site in sustainability terms, both in the context of PPG13, PPG4 and PPS6. To encourage alternative uses as set out in Policy H1 implies the removal of the majority of employment based activity at Hockley/Hawkwell and this would be contrary to National policy, would not be the most appropriate strategy when considered against alternatives and is therefore unsound.

Whilst it is acknowledged that improvement to the Eldon Way Industrial Estate can and should take place, the extent to which the mix of employment uses should be altered in favour of alternative land uses requires careful consideration. It is our view that a mix of existing or indeed new employment land uses with some Town Centre type uses should dominate the Eldon Way site. A mix of employment types between offices, light industry and other high technology industries should be encouraged as this will provide many locational advantages to the firms that agglomerate together. The Council says that the existing uses on this site are harmful to amenity. However, the site has operated for many years without any significant issues and if renewal for B1 type uses are encouraged then the employment area can be maintained without harm to amenity. Renewal of the employment stock can help develop and improve trade, improve the sustainability of businesses as a whole and make for a more flexible labour market as skill levels are varied. A singularly different use altogether or a variety of uses which excludes employment could undermine the long term sustainability of the area and Town Centre. As such Policy H1 is not an effective strategy and should be amended to acknowledge the importance of Eldon Way and the need to renew the employment stock to ensure that the site maintains its important role as a employment site, albeit with some ancillary alternative use development where appropriate.

The 2008 Retail Study notes that Hockley Town Centre is not strong and there is trade leakage. Eldon Way Industrial Estate provides a customer base for existing town centre uses. Weekday spending within town centres is an important contributor to the viability of many retail and leisure businesses either through expenditure by employees during the lunchtime trade or expenditure by employers, on necessary goods and services. This relationship helps sustain the critical mass of a centre and provides a platform for new retail and leisure growth. It is important to have a balanced centre with a variety of uses. Policy H1, as currently drafted, implies the removal of employment related development and this is likely to harm the vitality and viability of Hockley Town Centre. The Council has presented no evidence to suggest that this is not the case. Importantly, the 2008 Retail Study explains that there is a need for additional retail and office space. In principle we would support additional office and other B1 type uses plus retail but employment uses should always dominate for the sustainability reasons given above. Retail and office development are likely to present a viable alternative to some of the more industrial type uses.

Consequently, we do not support the phrasing of the third paragraph of Policy H1 and maintain that the most appropriate strategy is to seek renewal of the employment stock with employment based uses and with some new retail development. Removal of employment land uses completely as currently implied-which was the approach adopted in the emerging Hockley Area Action Plan - is not a justifiable strategy.

One of the key tests of a Core Strategy is consistency between policies in the emerging Plan and this strikes at the heart of demonstrating an effective strategy. Policy H1 implies alternative uses to employment and the relocation of Eldon Way to a site identified under Policy ED4. However, Policy RTC6 sets out a suite of policy criteria for Hockley Town Centre which includes employment and commercial activities. In addition Policy ED3 seeks the protection of sustainable employment sites (Eldon Way) and notes that some reallocation of existing employment sites will include a proportion of employment. It notes that in the case of Eldon Way employment development will form a component. The policies appear at odds with one another. The third paragraph of Policy H1 should be deleted as the second paragraph is sufficient to set a strategic context for delivering new housing development. The employment policies and Hockley specific policies should be left to consider the type and quantum of land uses appropriate in the area. If the third paragraph of H1 is to be retained then it should tie in more with Policy RTC6 and in our view explain that employment uses should dominate any redevelopment proposals for the Eldon Way site and that retail and leisure uses should be a supporting proportion.

Implementation, Monitoring and Delivery - page 132 onwards

One of the key tests of soundness is that the Core Strategy should be effective - it should be able to deliver its strategy. The Implementation strategy set out at page 132 onwards of the Core Strategy does not explain how Policy H1, RTC6 and the strategy for redeveloping Eldon Way (Policy ED2 and ED3) will be delivered. The comment at Policy ED3 on

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page 161 identifies it as a potential risk and alludes to land assembly difficulties and the choices to be made by owner/occupiers. In order to deliver the strategy there should be a clear understanding as to whether the new land use values being promoted are sufficient to encourage relocation voluntarily. Secondly there is a need for more information to be gathered and presented to show that current occupiers and landowners are willing to relocate and the timescales likely for this. For example, do the building lease contracts enable early review or are there any break out clauses. There should be some commentary on whether the Council will engage in compulsory purchase orders to pursue their strategy should the 'encouragement' route fail. As currently drafted there is no clear path to deliver the strategy and the danger is that despite reallocation, the sites identified for redevelopment will not come forward in the plan period. In this regard, evidence to satisfy the test of soundness is not provided.

Policy H2 - General Locations

We support the strategy that new housing growth should be targeted at land South of Hawkwell. This area is suitably located to the urban area of Hockley/Hawkwell and to tie in with the settlement tiers on page 40 of the Submission Core Strategy the same terminology for settlement should be used. This ensures a consistency within the SCS. The choice of this location as a housing growth area is appropriate as it would not contribute to the coalescence of the urban area with Ashingdon (there is existing development between this identified housing area at Rectory Road and Ashingdon and moreover, Rectory Road can form a natural physical boundary for the new Green belt boundary. This area is also well located to the existing road network. Cherry Orchard Way has recently been improved and provides much better accessibility to the proposed housing growth area than any other location around Hockley/Hawkwell. The existing bus routes along Rectory Road also make this location sustainable and the additional housing proposed will help underpin the financial viability of bus routes in this area. Locally there are employment opportunities, including the small commercial estate off Main Road. The Eldon Way Industrial Estate adjacent to the Town Centre also provides the opportunity for employment locally. Extensive public open space, play pitches and built leisure facilities are located just to the north of this area and a community hall is located off Briar Close, nearby. The area to the south of Hockley/Hawkwell is close to local shops on the corner of Heycroft Road and Main Road and there are numerous footpath links between this area and the local community including links via Thorpe Road, Thorpe Close, Briar Close, Hawkwell Park and Park Gardens. The area therefore provides the opportunity to enhance existing links, including cycle links, and contribute towards community integration - more so than other sites on the south side of this settlement. The site is also in the control of one house builder and deliverable.

However, we find that the Policy is not fully consistent with national policy and furthermore needs to be reviewed in order to be justified and effective. We have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with this policy and feel that Green Belt review should be more explicit throughout the SCS. We note that it is only Policy H3 which indicates the need for Green Belt land review. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H2 and certainly Policy H3 and Policy GB1 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary.

Policy H2 - Phasing and Quantum

The 2008 Preferred Core Strategy document indicated that the area south of Hawkwell should deliver 330 dwellings over a phasing period to post 2021 (see Policy H2 and H3 of that document). The SCS reduces the quantum of housing in this area to 175 but expects delivery by 2015. At a broader level the Preferred Options Core Strategy of 2008, (Policy H2) required 1,450 dwellings to 2015 and a further 1,050 by 2021. In the SCS the figures are now 775 and 1,010 respectively.

Since the SHLAA post dates the publication of the SCS, we are uncertain as to the reason why such a significant reduction in quantum of housing and extensions to the residential envelope is considered necessary. Presumably it is the 'new' strategy to redevelop existing employment areas within the settlements that has led to this change. Our representations on this strategy and specifically the Eldon Way Industrial Estate are included elsewhere within our representations. Previously we have commented on the Table at paragraph 4.6 of the Submission Core Strategy and the lack of evidence to underpin that table. It seems odd that in the space of a year the expected requirement for Greenfield sites has effectively halved on the basis of a SHLAA exercise. The community is therefore not able to effectively

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comment on the housing land supply and at this stage the Submission Core Strategy is legally unsound.

That said, we are of the view that the quantum of housing envisaged south of Hockley/Hawkwell should be more than the 175 currently envisage. In coming to this view we have reviewed the Urban Capacity Study and the latest housing figures in the Annual Monitoring Report 2008. We conclude that the shortfall in housing land supply is such that 330 dwellings in this location is appropriate.

The recently published SHLAA is based upon the data obtained from the Urban Capacity Study 2007, a call for sites exercise and data from the Annual Monitoring Report 2008.

The 2007 Urban Capacity Study (UCS)

1. 2007 is widely recognised as being the peak level of house prices in the UK and it was acknowledged by Government and practitioners alike that 2007 house prices were at an unsustainable level. It is our view that utilising the 2007 UCS as an evidence base without reference to the market does not pick up the depressed demand that is likely to now exist. Recent corrections to the housing market now mean that housing land prices are at a much lower and arguably more affordable level than before. The implications are that some pdl may not be viable for housing development. Often brownfield sites have much higher development costs than Greenfield sites and so the yield from urban capacity will be much lower than anticipated in the 2007 study. One example is the employment allocation of the Adopted Local Plan located at 76-92 Main Road, Hawkwell. This site has been allocated for several years and has been available during the most recent rises in residential property prices during 2006-07. As a consequence the lack of progress on the site can only be described by its current occupancy and perhaps it comprises high value uses that do not encourage redevelopment. Despite this the site is identified as having high potential for alternative use and high potential demand. The SHLAA form notes that there is no information on legal constraints (e.g., tenancy agreements) As a consequence it is difficult to see how this could continue to be a potential site and as a consequence the allowance for green field releases should be increased.

2. There are considered to be other instances in the UCS and the recently published SHLAA where the assumptions and calculations would indicate that the 1301 urban capacity figure is over optimistic and the SHLAA assessment is limited. In the assessment of 'non-residential sites in appropriate locations' within the UCS assumptions are made as to the probability of sites coming forward for new housing. 68-72 West Street, Rochford is identified as a high probability site but we note that it has been subject to 7 refusals of planning permission/conservation consent. There is a significant gap between the urban capacity identified as being suitable by the Council and the capacity applied for by the owners. Given its alternate use value, it is debateable whether the two capacity figures can be reconciled. No 247 London Road is another example of a site allocated in the Local Plan but which hasn't come forward. This is now the subject of a proposal for a care home and if approved would further limit the scope for market/affordable housing capacity on the site. A striking example of how the urban capacity study has underestimated is also evidence by 2-4 Alderman's Hill, Hockley - described as a disused service station. There has been no residential development application on this site since 2004 and most recent applications have sought commercial use of the site. Rather than being evidence of housing land deliverability, this particular site evidences the need for commercial uses in the area. There are therefore deliverability doubts over these 'high probability' categories which amount to some 40 units.

3. In relation to the assessment in the UCS entitled 'intensification of existing residential uses' we note that the assessment is premised on an assessment of recent trends taking into account net completions between 2001-2006 and 2005-06. This is effectively an assessment of windfall trends and not an approach that PPS3 encourages. Importantly Table 3-12 in the urban capacity study seeks to project forward urban capacity from residential redevelopment - a period that benefited from high house prices and PPG3 guidance encouraging redevelopment. These two circumstances have markedly changed and so the assumptions and conclusions drawn would also have changed. Even taking into account the UCS discounting, the reliability of the 404 units from this source must be questioned and in our view the 1301 figure cannot be a sound basis for urban capacity and further Greenfield releases are necessary.

4. In the section of the UCS entitled 'subdivision of dwellings' and 'living above the shop' it is estimated that recent trends would result in 7 and 15 units. Our concerns with using trends as a basis for urban capacity are detailed above - PPS3 does not encourage this. Rather, local authorities are charged with surveying their areas, identifying which areas may yield urban capacity and how much and developing policies to achieve that. Government guidance does not encourage the estimation of windfalls in the way the UCS does.

5. Redevelopment of established employment land is a separate section within the UCS. At 1 above we identify the low probability of the Main Road residential allocation coming forward. This remaining section of the UCS considers 11 further employment sites which were first identified in the 2000 UCS. Three of these are considered to have a high probability of coming forward. We have looked at these three sites and can find no evidence that they are likely to come forward. In the 8 years between 2000 and 2008 the three identified high probability employment sites have not been developed and there is no reason to assume that the next 5-10 years will be any different. For example the Rawreth Industrial Estate is identified as being well used in the UCS and although it has some unneighbourly uses there is no indication that the site is available, suitable or deliverable for residential. Land between 39-69 Lower Lambricks, Rayleigh is identified as having a high probability of residential uses. Yet there is no

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evidence of any pre-application advice or planning applications for this area. Stambridge Mills, Mill Lane, Stambridge is a further example. This site is separated from the urban area, in a flood risk zone and protected in the 2006 Replacement Local Plan by Policy EB9 which promotes B1 uses. Against this background there is only two relevant planning applications affecting this area both date from the early 1990's and relate to a plant room and loading bay. There is no evidence that this is likely to come forward for residential purposes in the next 5-10 years.

6. In the UCS extant permissions are identified as 856 dwellings. It is important to note that this figure needs to be continually reassessed so that from the point of adoption of the Core Strategy a 5 and 10 year housing land supply is available. The SHLAA notes extant permissions for 2009-14 being 106. As noted below extant permissions do not necessarily translate into deliverable sites. There is therefore a contingency that needs to be built in. Further allocations on greenfield land need to be increased and as such the quantum of housing in the area south of Hockley/Hawkwell should be increased to 330 dwellings in order to begin to meet the shortfall identified.

The District Council's 5 year housing supply assessment

7. The District Council's Annual Monitoring Report ("AMR") 2008 purports to demonstrate a 5 year housing land supply. The preamble to Table 4.10 in the AMR 2008 explains that Rochford District Council ("RDC") has included units under construction, units with full permission, units with outline permission, units with a resolution to grant, units subject to preapplication discussion/Urban Capacity Assessment and land allocations in its trajectory. The reader is referred to Appendix B which breaks down the sites in more detail. The recently published SHLAA also includes a table showing a potential 1273 dwellings deliverable. However, it refers to "appropriate brownfield sites." Since these 'appropriate sites' are do not benefit from an application or a planning permission it is difficult to programme them into the housing delivery trajectory.

8. In the full planning permission category of the AMR 2008 where work has not yet started there can be no guarantee that all these sites will be delivered in the 5 years. This comment relates to the one above in relation to the recently published SHLAA. It is not uncommon for permissions to be obtained to provide a means for valuing a site where the owner has no immediate plans to sell the site or develop housing. Delivery may also be hampered by funding constraints, or site assembly problems (where sites are in an alternative use or relocation constraints). Appendix B of the AMR 2008 does not set out the intentions of the landowner or whether the sites are truly achievable in the 5 year period as per PPS3 requirements. The SHLAA purports to show developer intentions at Appendix C but the assessment by the local authority into the legitimacy of some of the claims is not presented. The evidence base is not as full as it should be to demonstrate the robustness of Table 4.6 of the SCS. It is also unclear the extent to which this table is based on either the UCS 2007, AMR 2008, SHLAA 2009 or a combination of all three. This should be set out clearly.

9. In addition, to the 'non delivery' of a proportion of new homes in the AMR 2008, there is concern at the timings of delivery in that data set, for example, 10 units in 2008-2009 relates to outline planning permissions and it is doubtful whether reserved matters can be turned round quick enough to begin delivering housing in this year period. There could well be examples in that set of data where the delivery of units in the first year of the 5 is unlikely, thus delivery is reduced for that period and pushed back and this process is then compounded throughout the data set up to and beyond year 5. Statistical evidence from the Department of Communities and Local Government ("CLG") reveals that building starts are 43% down on the quarter to March 2009 compared with March 2008. It is not clear whether the recently published SHLAA has taken this into account and unless it does the data in the Table at 4.6 of the SCS cannot be relied upon, particularly given the current recessionary circumstances. In relation to the Table at Paragraph 4.6 a refinement is therefore needed to take into account this effect on phasing.

10. This problem is compounded for other units relied upon where permission has been granted but no start on site has been made; this accounts for a considerable number of sites in 2009-10 period (100 dwellings) which is (year 2 of the 5 year period). A delay in these will require more Greenfield sites to be identified in order to meet the shortfall.

11. Finally we note that the East of England Plan expresses its land supply requirement as a minimum. This strategy is not reflected in the

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Submission version of the Core Strategy policy H2.

12. In summary since neither the UCS nor the Annual Monitoring Report form a SHLAA, reservations are maintained about the degree to which sufficient housing land has been identified.

Policy H3

In the Preferred Options Core Strategy 2008 more locations were identified for housing growth in the post 2021 phase. Whilst it is our view that land south of Hockley/Hawkwell should benefit from a greater number of dwellings than the 175 currently identified (330) in order to make the strategy effective. We are concerned at the significant change in strategy between the Preferred Option Core Strategy and the Submission version, which has significantly less housing growth on green field sites. This change in strategy is so significant that we would question whether it is appropriate in the context of soundness and the consultation processes that have taken place so far.

We also have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with other policies in the SCS and feel that Green Belt review should be more explicit throughout the SCS. As it currently stands there is a potential conflict with national policies and limited justification for the Green belt strategy. We note that in Policy H3, which indicates the need for Green Belt land review, the advice is limited and unclear. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H3 and Policy GB1/H2 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary. Not to do so is unsound for justification and effectiveness reasons.

Policy H4 - Affordable Housing

As currently drafted we feel that the policy is not concise enough and that the policy does not reflect current guidance. The phrase 'at least' would indicate that in most cases affordable housing above 35% will be sought. Our understanding is that the 35% figure is recommended in the SHMA and that to provide a policy framework which seeks to go beyond that figure would potentially be unworkable as many sites could not financially bare the burden of over a third of the net developable area not yielding a value. The policy should be redrafted so that "a target of 35% affordable housing shall be provided on all developments of 15 or more units..."

The last policy paragraph provides some scope to relax this policy, if there are clear site constraints that make on site provision impossible. The policy, though, is not particularly clear on what would constitute exceptional circumstances. For example, physical site constraints, which unusually raise development costs, would be one such reason and this should be specified. There may be other reasons including the nature of housing needs in the part of the District the site is located which justify affordable housing below the 35% target. Design reasons may also have a bearing on how provision is made and in what form, particularly if the site is in an historic area where design might override housing need argument. It is therefore recommended that the policy expand on the type of circumstances where affordable housing may be relaxed and the type of information that will be sought of applicant's who have a need to invoke this part of the policy.

Policy H5

In support of the policy, it is advantageous that no percentages requiring a specific mix are included. This flexibility will enable developers and the Council to respond directly to changing circumstances in the local housing market. In the past some authorities have set out a percentage for the type of housing they require only to find that after a few years of strict implementation there is an oversupply of property of that type and no flexibility in the policy to address the problem.

Policy ED2 - London Southend Airport

It is considered that to grow non aviation related employment at a location north of Southend Airport where sustainable access from the rest of Rochford District requires careful consideration. Most Airports are serviced by aviation related employment development and as such a location close to the airport is sensible and sustainable. However, for surface access reasons it would be inappropriate to encourage travel from Rochford's main settlements to what essentially

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would be a rural location for general employment uses. Whilst sustainable access would be improved by a railway station and better bus links, there is no evidence to suggest that a sustainable surface access strategy for non related employment development at the Airport can be achieved. Paragraph 11.22 explains the critical importance of a railway station to the delivery of the strategy yet the Transport Chapter and Implementation Chapter provide neither a policy nor an assessment of deliverability. It is also notable that the South Essex Rapid Transit Policy T4, as set out at paragraph 10.16, notes that Rochford is not proposed to be served but may be served in future phases. This uncertainty is no way to plan for a major employment land supply strategy in the District. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley/Hawkwell, Rochford and Rayleigh is unsound.

Policy ED3

We fully support the first sentence of the Policy and note the apparent contradiction with the statements in Policy H1 and elsewhere which seeks to develop on alternative uses at industrial estates such as Eldon Way.

This contradiction is evidence in the second paragraph of Policy ED3. In our representations on Policy H1 we have explained why it is not sound to diminish the employment stock at Eldon Way and the importance of maintaining a dominance of employment type uses at this estate. These arguments are not repeated here.

We note the sentiments of the third paragraph and in accordance with our representations elsewhere are of the view that this sentence should be revised to explain that Eldon Way will accommodate principally employment type uses. As noted elsewhere uses which are an alternative to employment would diminish this highly sustainable employment site and this is unsound when assessed against National Policy.

Policy ED4 - Future Employment Allocations

In part, the de-allocation strategy is not supported as it is considered unsound when set against sustainability criteria. In relation to the Eldon Way Industrial Estate it is considered critical to the ongoing sustainability of this settlement that employment uses are maintained at this location. It is close to the railway station, bus routes and local residential areas from which the opportunity exists for employees to walk or cycle to work. Its location adjacent to the Town Centre offers opportunity for some retail and leisure development to complement the centre and to maintain a supporting function. These sustainable benefits would not occur with the deallocation of Eldon Way or the significant erosion of its employment floorspace. Whilst redevelopment of the employment site to achieve new employment is supported, the dominant land use should continue to be employment use. As a consequence, the 18ha of land required for employment in this policy is considered to be excessive and the policy should be reviewed to explain that redevelopment of existing employment sites for primarily new employment development will be encouraged.

Policy T4

It is noted that the South Essex Rapid Transit policy, as elaborated upon at paragraph 10.16 notes that Rochford is not served but may be served in future phases. This uncertainty is contrary to the delivery principles of soundness and directly puts at issue the employment land supply strategy in the District which is founded on sustainable access to new sites. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley, Rochford and Rayleigh is unsound.

Appendix H1, CTL1 - Infrastructure

It is recognised that necessary infrastructure provision is an important part of creating a sustainable development and in that context appendix H1 is supported. The supporting text notes that the table at Appendix H1 is not exhaustive and in that context it is very important that the framework properly distinguishes between what should be provided as part of new development schemes and what shouldn't. It is therefore essential that the framework acknowledges the importance of Circular 05/05 and the tests which say that provision of infrastructure and/or contributions should be:

- * Relevant to planning
- * Necessary to make the proposed development acceptable in planning terms
- * Directly related to the proposed development
- * Fairly and reasonably related in scale and kind to the proposed development
- * Reasonable in all other respects

As is made clear (Paragraph B9 of Circular 5/05) contributions should not be used to make good existing deficiencies in infrastructure provision. Nor are they to be used to secure contributions to the achievement of wider planning objectives that are not necessary for consent to be granted. In that context the Core Strategy should set this out as its policy framework.

Policy GB1 - Green Belt

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The objectives of this policy are supported, although as noted in other representations the SCS is unsound as it does not meet the tests in relation to justification, compliance with national policy or effectiveness of strategy.

Policy GB1 mentions the objective to allocate the minimum amount of Green Belt land necessary. The policy should link to the requirements of PPG2 and RSS which are discussed in relation to the representations on Policy H2 and H3. The policy should set out a timeframe for the review and why Rochford requires a Green Belt review (what the exceptional circumstances are in this District that justify a review of local boundaries. The policy should be amended to set out a 2031 time frame and this may require the SCS to have an extended life span beyond 2021.

We would recommend the deletion of the word character since Green Belt designation is not related to landscape character as currently drafted. For clarity we would also recommend that the Policy or its supporting text explain that a Green Belt review will take place in support of an allocations document (paragraph 6.6) in order to identify an appropriate new boundary. This is particularly necessary given the commitment to a Green belt review in the adopted Local Development Scheme.

Policy CLT1 - Planning Obligations and Standard Charges

In view of the need to test fully the basis on which standard charges are based it is important that any document produced is in a development plan document that enables an examination in public. The policy should explain this in order that when the document is produced it accords with Policy and is based on sound evidence.

ENV9 - Code for Sustainable Homes

Object. The advice from the Department of Communities and Local Government is that the new requirement to have a rating against the Code does not make it mandatory to build a Code home or to have each new home assessed against the Code. It does however mean that all buyers of new homes be given clear information about the sustainability of the new home. A house builder can do this in one of two ways:

- they can choose to build a Code home, have that home assessed against the Code and provide the home buyer with a Code certificate stating the star rating the home has achieved
- or, they can choose to build to current building regulations standards, not to pay for an assessment and instead download a nil-rated certificate of non-assessment (also referred to as a nil-rating) to provide to the home buyer.

As such the Rochford policy requirement that coding 3 be achieved by 2010 and Code 6 by 2013 is out of step with Government advice. The policy wording should explain that it is just the coding that is a requirement of new homes and not necessarily that new homes should be constructed to achieve a standard.

The current Government objectives are for the code to be introduced over a reasonable period with development to be code 3 by 2010, code level 4 by 2013 and code level 5 by 2016. In this regard the policy, as drafted, seeks to achieve code 6 by 2013 and consequently compresses the code requirements into a shorter time scale with the costs associated expected to be subsumed within the housing market through higher prices. This is not a realistic strategy for the delivery of sustainable homes and we consider that the policy should be revised to extend the period of compliance but to also make it more flexible based on local circumstances.

Research undertaken on behalf of the Housing Corporation and English Partnerships, published in February 2007 'A cost review of the code for sustainable homes' reveals that code 6 is unlikely to be unattainable given existing technologies and that achieving code 5 could result in a 12% to 20% increase in costs that would have to be passed onto the consumer. Given the variability of the housing market with peaks and troughs, it is unlikely that the housing market would be able to subsume this level of price increase.

The code system policy as currently drafted does not have regard to site circumstances and so many of the requirements could be difficult to meet. For example, micro electricity generation on site may be difficult to achieve where local circumstances deter the capture of wind or solar power. If more expensive technologies are required to generate power than is the norm then costs will rise. There may be other competing reasons why designs cannot include certain sustainability measures if housing sites are in sensitive landscape and historic locations. Alternatively there may be significant development costs associated with site specific circumstances and so viability of the site's development becomes a valid consideration. By insisting on the code for sustainable homes other policy objectives such as affordable housing at particular rates and other contributions may need to be reconsidered. Consequently, we are of the view that this policy should be drafted in a manner which enables site specific circumstances to be taken into account. As noted above the Government explains that the code is a certification requirement and does not necessarily mean that buildings are constructed in accordance with a code level.

It is also important to note that it is not the purpose of planning legislation to duplicate other legislation. In this regard, the policy should accept that the Building Regulations will be the main vehicle for implementing this policy and that unless the coding requires external development then there will be no need to specify what is to be carried out in a planning application.

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Summary: Paragraph 4.6 - Evidence Base

To meet the soundness test Submission Core Strategies (SCS) must be justified, that is to say it must be founded on robust and credible evidence base and comprise the most appropriate strategy when considered against reasonable alternatives. The housing strategy in as far as it identifies a need for Green belt sites is sound, however, there are other elements which are unsound.

Paragraph 4.6 notes that the Strategic Housing Land Availability Assessment (SHLAA) has examined the supply of housing. It is presumed that the Table at paragraph 4.6 is the outcome of this examination. Whilst the SHLAA has some legitimacy in that it identifies various sites that are apparently available, we are concerned that because the SHLAA was only published in November 2009 it post dates the SCS. This implies that the SCS is driving the SHLAA exercise rather than the other way round. Whilst this may have no real practical effect on the outcome of the SCS and the identified need for Green Belt sites, the Inspector will be mindful of the advice in paragraphs 33 and 54 of PPS3 that SCS draw on the evidence in SHLAA. It may be that the SCS should explain how the evidence base has been used to justify the strategy.

PPS12 explains at paragraph 4.37 that Core Strategies are based on thorough evidence. Since the SHLAA has only recently been published it is considered that the SCS is unsound as it is not justifiable. This, together with other comments on the SCS, indicates that the process should be delayed to ensure that a more robust document is placed in front of the EiP Inspector.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

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Full Text: Local Development Framework

Representations on the Core Strategy
Submission Document, November 2009
On behalf of Barratts Eastern Counties

Introduction

The requirements of Core Strategies are enshrined in the 2004 Planning and Compensation Act, the Town & Country Planning (Local Development) England (Regulations) 2004 and the 2008 policy guidance in PPS12. The requirements of Coe Strategies are clear. And they are legal requirements. The Core Strategy must comply with the Local Development Scheme, Statement of Community Involvement and the Regulations. The Core Strategy must be subject to a sustainability appraisal, have regard to national guidance, conform generally with the Regional Spatial Strategy and have regard to any Sustainable Community Strategy. A Core strategy must be sound - justified, effective and consistent with national policy. The following representations therefore focus on these legal requirements.

HOUSING

Paragraph 4.6 - Evidence Base

To meet the soundness test Submission Core Strategies (SCS) must be justified, that is to say it must be founded on robust and credible evidence base and comprise the most appropriate strategy when considered against reasonable alternatives. The housing strategy in as far as it identifies a need for Green belt sites is sound, however, there are other elements which are unsound.

Paragraph 4.6 notes that the Strategic Housing Land Availability Assessment (SHLAA) has examined the supply of housing. It is presumed that the Table at paragraph 4.6 is the outcome of this examination. Whilst the SHLAA has some legitimacy in that it identifies various sites that are apparently available, we are concerned that because the SHLAA was only published in November 2009 it post dates the SCS. This implies that the SCS is driving the SHLAA exercise rather than the other way round. Whilst this may have no real practical effect on the outcome of the SCS and the identified need for Green Belt sites, the Inspector will be mindful of the advice in paragraphs 33 and 54 of PPS3 that SCS draw on the evidence in SHLAA. It may be that the SCS should explain how the evidence base has been used to justify the strategy.

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Table at Paragraph 4.6 - Evidence base

From our review of the available evidence it would appear that the housing land supply is insufficient and that Green Belt release are required. From the wider strategy being promoted we note that some of the sites that the District Council consider to be 'appropriate' are likely to relate to existing employment areas. As set out elsewhere in our representations, we maintain severe reservations that the redevelopment of existing employment sites for alternative uses and particularly the Eldon Way Industrial Estate is unsustainable. We will make reference to the effectiveness of this strategy in relation to sustainability, whether it is justified in the context of National Policy and the deliverability of such a strategy elsewhere.

In particular, paragraph 11.32 of the SCS refers to existing employment land and sites within the UCS. It does not refer the SHLAA and as such it appears that an evidence base to support the re-use of employment land for residential is not reported in the SCS.

Having reviewed the 2008 Annual Monitoring Report, as we did when commenting on the 2008 Preferred Options Core Strategy, we maintain severe doubts as to the appropriateness of some of the previously developed sites identified as potential housing sites and their expected housing yield. Whilst we cannot at this stage ascertain whether the SHLAA

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sites referred to in this table correlate with the Annual Monitoring Report and indeed the 2007 Urban Capacity Study, it is our view that there will be some commonality and so the reliance on these sites is likely to be at odds with Government Policy. We shall elaborate on this objection in relation to the specific housing policy below.

We note that the last two rows in the Table at paragraph 4.6 set out figures with and without Green Belt releases. The text to this section of the Core Strategy should, for reasons of clarity, explain that Green belt review will be necessary in order to deliver the required housing.

Paragraph 4.9

The table on page 40, which sets out the settlement tiers, is supported. Rayleigh, Rochford/Ashingdon, Hockley/Hawkwell are clearly the largest settlements in the District and they benefit from good employment, housing, leisure, community and public transport provision. These settlements are the most sustainable ones with the greatest mix of uses. Consequently, it is sensible that the Core Strategy identifies these as top tier settlements and is able to target them with growth accordingly. This component of the strategy is justified by reference to sustainability data and is effective, since targeting development at these locations will ensure a more sustainable pattern of development.

Paragraph 4.14

We maintain that the strategy for redeveloping the Eldon Way Industrial Estate for housing and other alternative uses to employment is unsound. It is neither justified nor effective. The Industrial Land Availability Study 2006 sets out on page 7 strategic objectives. The 3rd objective seeks to Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive. Clearly the strategy as currently drafted envisages major changes to existing industrial estates, including alternative uses. This strategy is not consistent with other strategies and evidence based studies and so cannot be justified in the context of the tests set out in PPS12. It is also an ineffective strategy since the new employment locations that would free up the Eldon Way site for redevelopment relies on transport infrastructure that has no certainty of being delivered. Principally, the erosion of employment uses at Eldon Way could make the settlement of Hockley/Hawkwell less sustainable and thus conflict with the tiered approach on page 40, paragraph 4.9.

Policy H1

Prioritising the use of previously developed land ("pdl") is supported in principle. It is a justified strategy in the context of PPS3 and effective as sequential choices can be made by implementing the policy. However, the District Council is also promoting a strategy which seeks the redevelopment of existing employment locations to alternative uses and by consequence is identifying green field sites for new employment development elsewhere (Policy ED4 refers). This 'land swapping' is not considered consistent with PPS3, nor is it considered to be justified or effective in delivering the desired strategy. This is particularly the case as most of the existing employment sites are occupied and therefore unavailable for redevelopment. In addition, the new Greenfield sites are in an arguably less sustainable locations away from the top tier settlements identified on page 40 of the Submission Core Strategy. Clearly this element of the strategy is inconsistent with the wider strategy.

The Industrial Land Availability Study 2006 is included as an evidence base by the District Council. It includes an introductory section, which explains that the authority wishes to make Rochford the place of choice for new business. It includes several strategic objectives on page 7 including "Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive." It reviews existing employment areas and identifies vacant land, including land available from allocations. It does not include any assessment of new sites or potential opportunities for new sites that might have been expected to feed into the Core Strategy. The strategy for identifying Green Belt site employment allocation does not appear to be based on any evidence in this document and in that context cannot be justified. The strategy being promoted potentially conflicts with Government policy in PPG13, PPG2 and emerging PPS4.

The Employment Land Study 2008 is a much later document. It has a key recommendation on page ii "we recommend that Rochford District Council adopts strong policies to protect existing employment land." Furthermore under recommendations for existing sites on page iii-iv of that document it states "In our view, Hockley Trading Centre is a strategically well placed employment location. However, we recognise the ambitions of the Hockley Town Centre masterplan and that within this the Council should consider it to be allocated for other uses. However, we recommend that this reallocation happen only if provision is made within the masterplan for office use within Hockley Town Centre as part of a mixed use scheme." The view of the writers of this document is clear - the Eldon Way Industrial estate (Hockley Trading Centre) is a good employment site and that it is for other reasons that alternative uses are being considered and only then if office development is supported. This supports our representations that new future uses at the Eldon Way site should be employment dominated and that alternative uses should relate to the objectives of the Town Centre which is to enhance the shopping and leisure facilities. Residential is not an appropriate alternative.

This document recommends the use of land to the west of Rayleigh for employment and envisages Green belt release. However, the SCS does not explain through the evidence base why existing employment sites should be 'deallocated' and Green belt land unnecessarily used.

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In addition to these key issues we have some specific concerns. As a consequence we maintain an objection to the second paragraph of Policy H1. This policy states that the Council will seek the redevelopment of various industrial estates including Eldon Way. The Policy says that alternative uses will be sought (presumably alternative to the existing employment offer) and that new land will be allocated elsewhere. This policy statement, in relation to Eldon Way in particular, is unsound for a number of reasons:

The emerging Hockley Area Action Plan consulted upon in 2008 states that the Eldon Way Industrial Estate is strategically well placed. In a sense this statement underplays the true importance of this highly sustainable employment location and only major employment area in Hockley/Hawkwell. The employment area is adjacent to the railway station and located a short distance from the main bus routes that run along Spa Road. Some of the residential areas of the town are also within walking distance of this commercial area, thus providing a potential for sustainable travel by employees. The Eldon Way Industrial Estate is therefore right at the heart of the settlement of Hockley/Hawkwell and provides an opportunity to meet sustainable transport objectives by reducing the need to travel by car. Consequently, this employment area should be highlighted as a premier employment site in sustainability terms, both in the context of PPG13, PPG4 and PPS6. To encourage alternative uses as set out in Policy H1 implies the removal of the majority of employment based activity at Hockley/Hawkwell and this would be contrary to National policy, would not be the most appropriate strategy when considered against alternatives and is therefore unsound.

Whilst it is acknowledged that improvement to the Eldon Way Industrial Estate can and should take place, the extent to which the mix of employment uses should be altered in favour of alternative land uses requires careful consideration. It is our view that a mix of existing or indeed new employment land uses with some Town Centre type uses should dominate the Eldon Way site. A mix of employment types between offices, light industry and other high technology industries should be encouraged as this will provide many locational advantages to the firms that agglomerate together. The Council says that the existing uses on this site are harmful to amenity. However, the site has operated for many years without any significant issues and if renewal for B1 type uses are encouraged then the employment area can be maintained without harm to amenity. Renewal of the employment stock can help develop and improve trade, improve the sustainability of businesses as a whole and make for a more flexible labour market as skill levels are varied. A singularly different use altogether or a variety of uses which excludes employment could undermine the long term sustainability of the area and Town Centre. As such Policy H1 is not an effective strategy and should be amended to acknowledge the importance of Eldon Way and the need to renew the employment stock to ensure that the site maintains its important role as a employment site, albeit with some ancillary alternative use development where appropriate.

The 2008 Retail Study notes that Hockley Town Centre is not strong and there is trade leakage. Eldon Way Industrial Estate provides a customer base for existing town centre uses. Weekday spending within town centres is an important contributor to the viability of many retail and leisure businesses either through expenditure by employees during the lunchtime trade or expenditure by employers, on necessary goods and services. This relationship helps sustain the critical mass of a centre and provides a platform for new retail and leisure growth. It is important to have a balanced centre with a variety of uses. Policy H1, as currently drafted, implies the removal of employment related development and this is likely to harm the vitality and viability of Hockley Town Centre. The Council has presented no evidence to suggest that this is not the case. Importantly, the 2008 Retail Study explains that there is a need for additional retail and office space. In principle we would support additional office and other B1 type uses plus retail but employment uses should always dominate for the sustainability reasons given above. Retail and office development are likely to present a viable alternative to some of the more industrial type uses.

Consequently, we do not support the phrasing of the third paragraph of Policy H1 and maintain that the most appropriate strategy is to seek renewal of the employment stock with employment based uses and with some new retail development. Removal of employment land uses completely as currently implied-which was the approach adopted in the emerging Hockley Area Action Plan - is not a justifiable strategy.

One of the key tests of a Core Strategy is consistency between policies in the emerging Plan and this strikes at the heart of demonstrating an effective strategy. Policy H1 implies alternative uses to employment and the relocation of Eldon Way to a site identified under Policy ED4. However, Policy RTC6 sets out a suite of policy criteria for Hockley Town Centre which includes employment and commercial activities. In addition Policy ED3 seeks the protection of sustainable employment sites (Eldon Way) and notes that some reallocation of existing employment sites will include a proportion of employment. It notes that in the case of Eldon Way employment development will form a component. The policies appear at odds with one another. The third paragraph of Policy H1 should be deleted as the second paragraph is sufficient to set a strategic context for delivering new housing development. The employment policies and Hockley specific policies should be left to consider the type and quantum of land uses appropriate in the area. If the third paragraph of H1 is to be retained then it should tie in more with Policy RTC6 and in our view explain that employment uses should dominate any redevelopment proposals for the Eldon Way site and that retail and leisure uses should be a supporting proportion.

Implementation, Monitoring and Delivery - page 132 onwards

One of the key tests of soundness is that the Core Strategy should be effective - it should be able to deliver its strategy. The Implementation strategy set out at page 132 onwards of the Core Strategy does not explain how Policy H1, RTC6 and the strategy for redeveloping Eldon Way (Policy ED2 and ED3) will be delivered. The comment at Policy ED3 on

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page 161 identifies it as a potential risk and alludes to land assembly difficulties and the choices to be made by owner/occupiers. In order to deliver the strategy there should be a clear understanding as to whether the new land use values being promoted are sufficient to encourage relocation voluntarily. Secondly there is a need for more information to be gathered and presented to show that current occupiers and landowners are willing to relocate and the timescales likely for this. For example, do the building lease contracts enable early review or are there any break out clauses. There should be some commentary on whether the Council will engage in compulsory purchase orders to pursue their strategy should the 'encouragement' route fail. As currently drafted there is no clear path to deliver the strategy and the danger is that despite reallocation, the sites identified for redevelopment will not come forward in the plan period. In this regard, evidence to satisfy the test of soundness is not provided.

Policy H2 - General Locations

We support the strategy that new housing growth should be targeted at land South of Hawkwell. This area is suitably located to the urban area of Hockley/Hawkwell and to tie in with the settlement tiers on page 40 of the Submission Core Strategy the same terminology for settlement should be used. This ensures a consistency within the SCS. The choice of this location as a housing growth area is appropriate as it would not contribute to the coalescence of the urban area with Ashingdon (there is existing development between this identified housing area at Rectory Road and Ashingdon and moreover, Rectory Road can form a natural physical boundary for the new Green belt boundary. This area is also well located to the existing road network. Cherry Orchard Way has recently been improved and provides much better accessibility to the proposed housing growth area than any other location around Hockley/Hawkwell. The existing bus routes along Rectory Road also make this location sustainable and the additional housing proposed will help underpin the financial viability of bus routes in this area. Locally there are employment opportunities, including the small commercial estate off Main Road. The Eldon Way Industrial Estate adjacent to the Town Centre also provides the opportunity for employment locally. Extensive public open space, play pitches and built leisure facilities are located just to the north of this area and a community hall is located off Briar Close, nearby. The area to the south of Hockley/Hawkwell is close to local shops on the corner of Heycroft Road and Main Road and there are numerous footpath links between this area and the local community including links via Thorpe Road, Thorpe Close, Briar Close, Hawkwell Park and Park Gardens. The area therefore provides the opportunity to enhance existing links, including cycle links, and contribute towards community integration - more so than other sites on the south side of this settlement. The site is also in the control of one house builder and deliverable.

However, we find that the Policy is not fully consistent with national policy and furthermore needs to be reviewed in order to be justified and effective. We have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with this policy and feel that Green Belt review should be more explicit throughout the SCS. We note that it is only Policy H3 which indicates the need for Green Belt land review. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H2 and certainly Policy H3 and Policy GB1 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary.

Policy H2 - Phasing and Quantum

The 2008 Preferred Core Strategy document indicated that the area south of Hawkwell should deliver 330 dwellings over a phasing period to post 2021 (see Policy H2 and H3 of that document). The SCS reduces the quantum of housing in this area to 175 but expects delivery by 2015. At a broader level the Preferred Options Core Strategy of 2008, (Policy H2) required 1,450 dwellings to 2015 and a further 1,050 by 2021. In the SCS the figures are now 775 and 1,010 respectively.

Since the SHLAA post dates the publication of the SCS, we are uncertain as to the reason why such a significant reduction in quantum of housing and extensions to the residential envelope is considered necessary. Presumably it is the 'new' strategy to redevelop existing employment areas within the settlements that has led to this change. Our representations on this strategy and specifically the Eldon Way Industrial Estate are included elsewhere within our representations. Previously we have commented on the Table at paragraph 4.6 of the Submission Core Strategy and the lack of evidence to underpin that table. It seems odd that in the space of a year the expected requirement for Greenfield sites has effectively halved on the basis of a SHLAA exercise. The community is therefore not able to effectively

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comment on the housing land supply and at this stage the Submission Core Strategy is legally unsound.

That said, we are of the view that the quantum of housing envisaged south of Hockley/Hawkwell should be more than the 175 currently envisage. In coming to this view we have reviewed the Urban Capacity Study and the latest housing figures in the Annual Monitoring Report 2008. We conclude that the shortfall in housing land supply is such that 330 dwellings in this location is appropriate.

The recently published SHLAA is based upon the data obtained from the Urban Capacity Study 2007, a call for sites exercise and data from the Annual Monitoring Report 2008.

The 2007 Urban Capacity Study (UCS)

1. 2007 is widely recognised as being the peak level of house prices in the UK and it was acknowledged by Government and practitioners alike that 2007 house prices were at an unsustainable level. It is our view that utilising the 2007 UCS as an evidence base without reference to the market does not pick up the depressed demand that is likely to now exist. Recent corrections to the housing market now mean that housing land prices are at a much lower and arguably more affordable level than before. The implications are that some pdl may not be viable for housing development. Often brownfield sites have much higher development costs than Greenfield sites and so the yield from urban capacity will be much lower than anticipated in the 2007 study. One example is the employment allocation of the Adopted Local Plan located at 76-92 Main Road, Hawkwell. This site has been allocated for several years and has been available during the most recent rises in residential property prices during 2006-07. As a consequence the lack of progress on the site can only be described by its current occupancy and perhaps it comprises high value uses that do not encourage redevelopment. Despite this the site is identified as having high potential for alternative use and high potential demand. The SHLAA form notes that there is no information on legal constraints (e.g., tenancy agreements) As a consequence it is difficult to see how this could continue to be a potential site and as a consequence the allowance for green field releases should be increased.

2. There are considered to be other instances in the UCS and the recently published SHLAA where the assumptions and calculations would indicate that the 1301 urban capacity figure is over optimistic and the SHLAA assessment is limited. In the assessment of 'non-residential sites in appropriate locations' within the UCS assumptions are made as to the probability of sites coming forward for new housing. 68-72 West Street, Rochford is identified as a high probability site but we note that it has been subject to 7 refusals of planning permission/conservation consent. There is a significant gap between the urban capacity identified as being suitable by the Council and the capacity applied for by the owners. Given its alternate use value, it is debateable whether the two capacity figures can be reconciled. No 247 London Road is another example of a site allocated in the Local Plan but which hasn't come forward. This is now the subject of a proposal for a care home and if approved would further limit the scope for market/affordable housing capacity on the site. A striking example of how the urban capacity study has underestimated is also evidence by 2-4 Alderman's Hill, Hockley - described as a disused service station. There has been no residential development application on this site since 2004 and most recent applications have sought commercial use of the site. Rather than being evidence of housing land deliverability, this particular site evidences the need for commercial uses in the area. There are therefore deliverability doubts over these 'high probability' categories which amount to some 40 units.

3. In relation to the assessment in the UCS entitled 'intensification of existing residential uses' we note that the assessment is premised on an assessment of recent trends taking into account net completions between 2001-2006 and 2005-06. This is effectively an assessment of windfall trends and not an approach that PPS3 encourages. Importantly Table 3-12 in the urban capacity study seeks to project forward urban capacity from residential redevelopment - a period that benefited from high house prices and PPG3 guidance encouraging redevelopment. These two circumstances have markedly changed and so the assumptions and conclusions drawn would also have changed. Even taking into account the UCS discounting, the reliability of the 404 units from this source must be questioned and in our view the 1301 figure cannot be a sound basis for urban capacity and further Greenfield releases are necessary.

4. In the section of the UCS entitled 'subdivision of dwellings' and 'living above the shop' it is estimated that recent trends would result in 7 and 15 units. Our concerns with using trends as a basis for urban capacity are detailed above - PPS3 does not encourage this. Rather, local authorities are charged with surveying their areas, identifying which areas may yield urban capacity and how much and developing policies to achieve that. Government guidance does not encourage the estimation of windfalls in the way the UCS does.

5. Redevelopment of established employment land is a separate section within the UCS. At 1 above we identify the low probability of the Main Road residential allocation coming forward. This remaining section of the UCS considers 11 further employment sites which were first identified in the 2000 UCS. Three of these are considered to have a high probability of coming forward. We have looked at these three sites and can find no evidence that they are likely to come forward. In the 8 years between 2000 and 2008 the three identified high probability employment sites have not been developed and there is no reason to assume that the next 5-10 years will be any different. For example the Rawreth Industrial Estate is identified as being well used in the UCS and although it has some unneighbourly uses there is no indication that the site is available, suitable or deliverable for residential. Land between 39-69 Lower Lambricks, Rayleigh is identified as having a high probability of residential uses. Yet there is no

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evidence of any pre-application advice or planning applications for this area. Stambridge Mills, Mill Lane, Stambridge is a further example. This site is separated from the urban area, in a flood risk zone and protected in the 2006 Replacement Local Plan by Policy EB9 which promotes B1 uses. Against this background there is only two relevant planning applications affecting this area both date from the early 1990's and relate to a plant room and loading bay. There is no evidence that this is likely to come forward for residential purposes in the next 5-10 years.

6. In the UCS extant permissions are identified as 856 dwellings. It is important to note that this figure needs to be continually reassessed so that from the point of adoption of the Core Strategy a 5 and 10 year housing land supply is available. The SHLAA notes extant permissions for 2009-14 being 106. As noted below extant permissions do not necessarily translate into deliverable sites. There is therefore a contingency that needs to be built in. Further allocations on greenfield land need to be increased and as such the quantum of housing in the area south of Hockley/Hawkwell should be increased to 330 dwellings in order to begin to meet the shortfall identified.

The District Council's 5 year housing supply assessment

7. The District Council's Annual Monitoring Report ("AMR") 2008 purports to demonstrate a 5 year housing land supply. The preamble to Table 4.10 in the AMR 2008 explains that Rochford District Council ("RDC") has included units under construction, units with full permission, units with outline permission, units with a resolution to grant, units subject to preapplication discussion/Urban Capacity Assessment and land allocations in its trajectory. The reader is referred to Appendix B which breaks down the sites in more detail. The recently published SHLAA also includes a table showing a potential 1273 dwellings deliverable. However, it refers to "appropriate brownfield sites." Since these 'appropriate sites' are do not benefit from an application or a planning permission it is difficult to programme them into the housing delivery trajectory.

8. In the full planning permission category of the AMR 2008 where work has not yet started there can be no guarantee that all these sites will be delivered in the 5 years. This comment relates to the one above in relation to the recently published SHLAA. It is not uncommon for permissions to be obtained to provide a means for valuing a site where the owner has no immediate plans to sell the site or develop housing. Delivery may also be hampered by funding constraints, or site assembly problems (where sites are in an alternative use or relocation constraints). Appendix B of the AMR 2008 does not set out the intentions of the landowner or whether the sites are truly achievable in the 5 year period as per PPS3 requirements. The SHLAA purports to show developer intentions at Appendix C but the assessment by the local authority into the legitimacy of some of the claims is not presented. The evidence base is not as full as it should be to demonstrate the robustness of Table 4.6 of the SCS. It is also unclear the extent to which this table is based on either the UCS 2007, AMR 2008, SHLAA 2009 or a combination of all three. This should be set out clearly.

9. In addition, to the 'non delivery' of a proportion of new homes in the AMR 2008, there is concern at the timings of delivery in that data set, for example, 10 units in 2008-2009 relates to outline planning permissions and it is doubtful whether reserved matters can be turned round quick enough to begin delivering housing in this year period. There could well be examples in that set of data where the delivery of units in the first year of the 5 is unlikely, thus delivery is reduced for that period and pushed back and this process is then compounded throughout the data set up to and beyond year 5. Statistical evidence from the Department of Communities and Local Government ("CLG") reveals that building starts are 43% down on the quarter to March 2009 compared with March 2008.

□
It is not clear whether the recently published SHLAA has taken this into account and unless it does the data in the Table at 4.6 of the SCS cannot be relied upon, particularly given the current recessionary circumstances. In relation to the Table at Paragraph 4.6 a refinement is therefore needed to take into account this effect on phasing.

10. This problem is compounded for other units relied upon where permission has been granted but no start on site has been made; this accounts for a considerable number of sites in 2009-10 period (100 dwellings) which is (year 2 of the 5 year period). A delay in these will require more Greenfield sites to be identified in order to meet the shortfall.

11. Finally we note that the East of England Plan expresses its land supply

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requirement as a minimum. This strategy is not reflected in the Submission version of the Core Strategy policy H2.

12. In summary since neither the UCS nor the Annual Monitoring Report form a SHLAA, reservations are maintained about the degree to which sufficient housing land has been identified.

Policy H3

In the Preferred Options Core Strategy 2008 more locations were identified for housing growth in the post 2021 phase. Whilst it is our view that land south of Hockley/Hawkwell should benefit from a greater number of dwellings than the 175 currently identified (330) in order to make the strategy effective. We are concerned at the significant change in strategy between the Preferred Option Core Strategy and the Submission version, which has significantly less housing growth on green field sites. This change in strategy is so significant that we would question whether it is appropriate in the context of soundness and the consultation processes that have taken place so far.

We also have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with other policies in the SCS and feel that Green Belt review should be more explicit throughout the SCS. As it currently stands there is a potential conflict with national policies and limited justification for the Green belt strategy. We note that in Policy H3, which indicates the need for Green Belt land review, the advice is limited and unclear. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H3 and Policy GB1/H2 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary. Not to do so is unsound for justification and effectiveness reasons.

Policy H4 - Affordable Housing

As currently drafted we feel that the policy is not concise enough and that the policy does not reflect current guidance. The phrase 'at least' would indicate that in most cases affordable housing above 35% will be sought. Our understanding is that the 35% figure is recommended in the SHMA and that to provide a policy framework which seeks to go beyond that figure would potentially be unworkable as many sites could not financially bare the burden of over a third of the net developable area not yielding a value. The policy should be redrafted so that "a target of 35% affordable housing shall be provided on all developments of 15 or more units..."

The last policy paragraph provides some scope to relax this policy, if there are clear site constraints that make on site provision impossible. The policy, though, is not particularly clear on what would constitute exceptional circumstances. For example, physical site constraints, which unusually raise development costs, would be one such reason and this should be specified. There may be other reasons including the nature of housing needs in the part of the District the site is located which justify affordable housing below the 35% target. Design reasons may also have a bearing on how provision is made and in what form, particularly if the site is in an historic area where design might override housing need argument. It is therefore recommended that the policy expand on the type of circumstances where affordable housing may be relaxed and the type of information that will be sought of applicant's who have a need to invoke this part of the policy.

Policy H5

In support of the policy, it is advantageous that no percentages requiring a specific mix are included. This flexibility will enable developers and the Council to respond directly to changing circumstances in the local housing market. In the past some authorities have set out a percentage for the type of housing they require only to find that after a few years of strict implementation there is an oversupply of property of that type and no flexibility in the policy to address the problem.

Policy ED2 - London Southend Airport

It is considered that to grow non aviation related employment at a location north of Southend Airport where sustainable access from the rest of Rochford District requires careful consideration. Most Airports are serviced by aviation related employment development and as such a location close to the airport is sensible and sustainable. However, for surface

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access reasons it would be inappropriate to encourage travel from Rochford's main settlements to what essentially would be a rural location for general employment uses. Whilst sustainable access would be improved by a railway station and better bus links, there is no evidence to suggest that a sustainable surface access strategy for non related employment development at the Airport can be achieved. Paragraph 11.22 explains the critical importance of a railway station to the delivery of the strategy yet the Transport Chapter and Implementation Chapter provide neither a policy nor an assessment of deliverability. It is also notable that the South Essex Rapid Transit Policy T4, as set out at paragraph 10.16, notes that Rochford is not proposed to be served but may be served in future phases. This uncertainty is no way to plan for a major employment land supply strategy in the District. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley/Hawkwell, Rochford and Rayleigh is unsound.

Policy ED3

We fully support the first sentence of the Policy and note the apparent contradiction with the statements in Policy H1 and elsewhere which seeks to develop on alternative uses at industrial estates such as Eldon Way.

This contradiction is evidence in the second paragraph of Policy ED3. In our representations on Policy H1 we have explained why it is not sound to diminish the employment stock at Eldon Way and the importance of maintaining a dominance of employment type uses at this estate. These arguments are not repeated here.

We note the sentiments of the third paragraph and in accordance with our representations elsewhere are of the view that this sentence should be revised to explain that Eldon Way will accommodate principally employment type uses. As noted elsewhere uses which are an alternative to employment would diminish this highly sustainable employment site and this is unsound when assessed against National Policy.

Policy ED4 - Future Employment Allocations

In part, the de-allocation strategy is not supported as it is considered unsound when set against sustainability criteria. In relation to the Eldon Way Industrial Estate it is considered critical to the ongoing sustainability of this settlement that employment uses are maintained at this location. It is close to the railway station, bus routes and local residential areas from which the opportunity exists for employees to walk or cycle to work. Its location adjacent to the Town Centre offers opportunity for some retail and leisure development to complement the centre and to maintain a supporting function. These sustainable benefits would not occur with the deallocation of Eldon Way or the significant erosion of its employment floorspace. Whilst redevelopment of the employment site to achieve new employment is supported, the dominant land use should continue to be employment use. As a consequence, the 18ha of land required for employment in this policy is considered to be excessive and the policy should be reviewed to explain that redevelopment of existing employment sites for primarily new employment development will be encouraged.

Policy T4

It is noted that the South Essex Rapid Transit policy, as elaborated upon at paragraph 10.16 notes that Rochford is not served but may be served in future phases. This uncertainty is contrary to the delivery principles of soundness and directly puts at issue the employment land supply strategy in the District which is founded on sustainable access to new sites. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley, Rochford and Rayleigh is unsound.

Appendix H1, CTL1 - Infrastructure

It is recognised that necessary infrastructure provision is an important part of creating a sustainable development and in that context appendix H1 is supported. The supporting text notes that the table at Appendix H1 is not exhaustive and in that context it is very important that the framework properly distinguishes between what should be provided as part of new development schemes and what shouldn't. It is therefore essential that the framework acknowledges the importance of Circular 05/05 and the tests which say that provision of infrastructure and/or contributions should be:

- * Relevant to planning
- * Necessary to make the proposed development acceptable in planning terms
- * Directly related to the proposed development
- * Fairly and reasonably related in scale and kind to the proposed development
- * Reasonable in all other respects

As is made clear (Paragraph B9 of Circular 5/05) contributions should not be used to make good existing deficiencies in infrastructure provision. Nor are they to be used to secure contributions to the achievement of wider planning objectives that are not necessary for consent to be granted. In that context the Core Strategy should set this out as its policy framework.

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Policy GB1 - Green Belt

The objectives of this policy are supported, although as noted in other representations the SCS is unsound as it does not meet the tests in relation to justification, compliance with national policy or effectiveness of strategy.

Policy GB1 mentions the objective to allocate the minimum amount of Green Belt land necessary. The policy should link to the requirements of PPG2 and RSS which are discussed in relation to the representations on Policy H2 and H3. The policy should set out a timeframe for the review and why Rochford requires a Green Belt review (what the exceptional circumstances are in this District that justify a review of local boundaries. The policy should be amended to set out a 2031 time frame and this may require the SCS to have an extended life span beyond 2021.

We would recommend the deletion of the word character since Green Belt designation is not related to landscape character as currently drafted. For clarity we would also recommend that the Policy or its supporting text explain that a Green Belt review will take place in support of an allocations document (paragraph 6.6) in order to identify an appropriate new boundary. This is particularly necessary given the commitment to a Green belt review in the adopted Local Development Scheme.

Policy CLT1 - Planning Obligations and Standard Charges

In view of the need to test fully the basis on which standard charges are based it is important that any document produced is in a development plan document that enables an examination in public. The policy should explain this in order that when the document is produced it accords with Policy and is based on sound evidence.

ENV9 - Code for Sustainable Homes

Object. The advice from the Department of Communities and Local Government is that the new requirement to have a rating against the Code does not make it mandatory to build a Code home or to have each new home assessed against the Code. It does however mean that all buyers of new homes be given clear information about the sustainability of the new home. A house builder can do this in one of two ways:

- they can choose to build a Code home, have that home assessed against the Code and provide the home buyer with a Code certificate stating the star rating the home has achieved
- or, they can choose to build to current building regulations standards, not to pay for an assessment and instead download a nil-rated certificate of non-assessment (also referred to as a nil-rating) to provide to the home buyer.

As such the Rochford policy requirement that coding 3 be achieved by 2010 and Code 6 by 2013 is out of step with Government advice. The policy wording should explain that it is just the coding that is a requirement of new homes and not necessarily that new homes should be constructed to achieve a standard.

The current Government objectives are for the code to be introduced over a reasonable period with development to be code 3 by 2010, code level 4 by 2013 and code level by 2016. In this regard the policy, as drafted, seeks to achieve code 6 by 2013 and consequently compresses the code requirements into a shorter time scale with the costs associated expected to be subsumed within the housing market through higher prices. This is not a realistic strategy for the delivery of sustainable homes and we consider that the policy should be revised to extend the period of compliance but to also make it more flexible based on local circumstances.

Research undertaken on behalf of the Housing Corporation and English Partnerships, published in February 2007 'A cost review of the code for sustainable homes' reveals that code 6 is unlikely to be unattainable given existing technologies and that achieving code 5 could result in a 12% to 20% increase in costs that would have to be passed onto the consumer. Given the variability of the housing market with peaks and troughs, it is unlikely that the housing market would be able to subsume this level of price increase.

The code system policy as currently drafted does not have regard to site circumstances and so many of the requirements could be difficult to meet. For example, micro electricity generation on site may be difficult to achieve where local circumstances deter the capture of wind or solar power. If more expensive technologies are required to generate power than is the norm then costs will rise. There may be other competing reasons why designs cannot include certain sustainability measures if housing sites are in sensitive landscape and historic locations. Alternatively there may be significant development costs associated with site specific circumstances and so viability of the site's development becomes a valid consideration. By insisting on the code for sustainable homes other policy objectives such as affordable housing at particular rates and other contributions may need to be reconsidered. Consequently, we are of the view that this policy should be drafted in a manner which enables site specific circumstances to be taken into account. As noted above the Government explains that the code is a certification requirement and does not necessarily mean that buildings are constructed in accordance with a code level.

It is also important to note that it is not the purpose of planning legislation to duplicate other legislation. In this regard, the policy should accept that the Building Regulations will be the main vehicle for implementing this policy and that unless the coding requires external development then there will be no need to specify what is to be carried out in a planning

Core Strategy Submission Document

O - 16914 - 10009 - Introduction, 4.6 - i, ii, iii

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Summary: application.
Table at Paragraph 4.6 - Evidence base

From our review of the available evidence it would appear that the housing land supply is insufficient and that Green Belt release are required. From the wider strategy being promoted we note that some of the sites that the District Council consider to be 'appropriate' are likely to relate to existing employment areas. As set out elsewhere in our representations, we maintain sever reservations that the redevelopment of existing employment sites for alternative uses and particularly the Eldon Way Industrial Estate is unsustainable. We will make reference to the effectiveness of this strategy in relation to sustainability, whether it is justified in the context of National Policy and the deliverability of such a strategy elsewhere.

In particular, paragraph 11.32 of the SCS refers to existing employment land and sites within the UCS. It does not refer the SHLAA and as such it appears that an evidence base to support the re-use of employment land for residential is not reported in the SCS.

Having reviewed the 2008 Annual Monitoring Report, as we did when commenting on the 2008 Preferred Options Core Strategy, we maintain severe doubts as to the appropriateness of some of the previously developed sites identified as potential housing sites and their expected housing yield. Whilst we cannot at this stage ascertain whether the SHLAA sites referred to in this table correlate with the Annual Monitoring Report and indeed the 2007 Urban Capacity Study, it is our view that there will be some commonality and so the reliance on these sites is likely to be at odds with Government Policy. We shall elaborate on this objection in relation to the specific housing policy below.

We note that the last two rows in the Table at paragraph 4.6 set out figures with and without Green Belt releases. The text to this section of the Core Strategy should, for reasons of clarity, explain that Green belt review will be necessary in order to deliver the required housing.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16833 - 9912 - Introduction, 4.7 - i, ii

16833 Object

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Respondent: M D Smith & Son [9912]

M D Smith & Son
Hambro Nurseries
Chelmsford Road
Battlesbridge
Wickford
SS11 8SY

Agent: Andrew Martin Associates Ltd (Mr David Maxwell)
[9911]

Andrew Martin Associates Ltd
Croxtan's Mill
Little Waltham
Chelmsford
Essex
CM3 3PJ
01245 361611

Full Text: Whilst we support the assertion that some land falling within the Green Belt will need to be released to achieve the District housing requirements, it is impossible to comment properly or logically on the extent of land that will be required falling within the Green Belt. The Council has failed to provide the contents and recommendations contained within the SHLAA.

The Core Strategy Proposed Submission Document should be made available for a further six week period and notices should be published to inform all interested parties that the SHLAA has been now been completed and forms a key part of the Evidence Base to the Core Strategy.

Supporting document received Council ref AE23

Summary: Whilst we support the assertion that some land falling within the Green Belt will need to be released to achieve the District housing requirements, it is impossible to comment properly or logically on the extent of land that will be required falling within the Green Belt. The Council has failed to provide the contents and recommendations contained within the SHLAA.

Supporting document received Council ref AE23

Change to Plan The Core Strategy Proposed Submission Document should be made available for a further six week period and notices should be published to inform all interested parties that the SHLAA has been now been completed and forms a key part of the Evidence Base to the Core Strategy.

Appear at exam? No **Soundness Tests** i, ii

Core Strategy Submission Document

O - 15874 - 14101 - Introduction, 4.8 - ii

15874 Object

CHAPTER 4 Introduction, 4.8

Respondent: miss Jenny Cribb [14101]

45 hambro Avenue
rayleigh
SS6 9Nj
U.K
01268 784533

Agent: N/A

Full Text: I do not believe we have sufficient infrastructure to support the development of the proposed number of new builds, I am concerned over the amount of traffic this will increase on our already too busy roads

Summary: I do not believe we have sufficient infrastructure to support the development of the proposed number of new builds, I am concerned over the amount of traffic this will increase on our already too busy roads

Change to Plan I believe other brown field sites should be investigated before planning goes ahead

Appear at exam? No

Soundness Tests ii

Core Strategy Submission Document

S - 15969 - 13441 - Introduction, 4.8 - None

15969 Support

CHAPTER 4 Introduction, 4.8

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: We welcome recognition of the need to protect areas of landscape value, ecological importance and high quality agricultural land.

Summary: We welcome recognition of the need to protect areas of landscape value, ecological importance and high quality agricultural land.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16709 - 7834 - Introduction, 4.8 - i

16709 Object

CHAPTER 4 Introduction, 4.8

Respondent: Ms G Yeadell [7834]

6 Southend Road
Hockley
Essex
SS5 4QQ
01702 205450

Agent: N/A

Full Text: Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1

Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2 you discarded N.E.Hockley as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley..along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

Response to C.S Preferred Options 2008 and HAAP 2009

June 2009 issue C S Submission issue says Eldon Way will be used for housing, whereas Sept.2009 issue says "alternative uses, including residential.." to be decided by HAAP (Issues consultation done, Pref.Options issue awaited, but judging from JAAP Pref.Options decision - namely biggest option chosen against overriding opposition, it will be housing).

Need to be logical and even-handed in proposals

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

Establish likely level of Standard Charges. Accept you cannot turn district into motorways with wholesale demolition.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

Para.10.5 "..highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which cannot be altered without much destruction.

Reply to CS Pref. Options 2008 & HAAP Issues/Options 2009

Policy T3, CLT1 Appendix CLT1 Public transport RDC admits this is in the private sector. In Hockley, operator has cut No7 service to 1 per hour from Ashingdon Schools, claiming it is unviable beyond. This is unlikely to change as Hockley is car dependant. No8 bus through Hawkwell is cut to 1 per hour to Rayleigh, for same reason as No7. Proposed planning agreements with developers can't run: eg, a community centre or classroom given by a developer remains once he has moved on - how can that apply for an on-going bus service?

Reply to Infrastructure Transport in CS Pref. Opts. 2008 and to HAAP Issues Opts. 2009.

Ch.11 Economic development

Policy ED3 Core Strategy preferred Options 2008 hinted at possible housing in Eldon Way site. June 2009 Submission version, without consultation, said Eldon Way would be housing (map included Foundry, not the text). September 2009 Submission said redevelopment would be in HAAP (which apart from the Issues/Options version, is unfinished. Judging from results of JAAP Preferred Options where biggest option is chosen, though most respondents were against it, site will be housing, without consultation.

16709 Object

CHAPTER 4 Introduction, 4.8

Para.1.25, Para.11.32 Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to accommodated employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

Reply to HAAP Issues Options 2009

Remove compulsory relocation

Policy ED4 Policy states Council will allocate 18ha of land to make up for de-allocations in ED3 - that proves point above.

Proposals for moving employment to out of town locations with no existing transport links are contrary to government policies PPG4, PPS1 and PPS4 and Core Strategy Policy T1.

Evidence Base is ignored by contravening Hockley Parish Plan 2007 and ignoring residents' views on HAAP Issues/Options. Next stage of HAAP Preferred Options is pre-empted and rendered irrelevant. Core Strategy plans to relocate Eldon Way Foundry estate to Greenfield site with no nearby bus or railway. RDC plans to upgrade the nearest road to dual carriageway, though the connecting B1013 (through Hockley) will stay single, said by ECC Highways statistics to be 72% capacity. Airport bosses and council cannot suggest there will be no traffic growth from JAAP and new industrial site.

Reply to Hockley Parish Plan 2007. HAAP Issues 2009

Move to new industrial site near airport contravenes PPS4:

- EC7.3C "out of centre sites, with preference given to sites...well served by choice of...transport and...close to centre and...high likelihood of forming links with centre". There is no current public transport and links with centres is unlikely".

- EC 7.5.1 "whether the site is or will be accessible and well served by choice of transport, public transport, walking and cycling, as well as by car...". Remote location, narrow busy B1013 makes the site unsuitable for access by cycle or on foot.

It also contravenes PPS1 (27vii)... "reduce need to travel, encourage accessible public transport provision to secure more sustainable patterns of transport...Planning should actively manage patterns of urban growth to make fullest use of public transport and focus development in existing centres, near to major public transport interchanges". Core Strategy undermines its own policy Transport and Highways policy T1 and is unsound.

Although shown on accompanying drawing in earlier versions, there was no prior textual mention of Foundry industrial estate (next to Eldon Way) for redevelopment until current CS 2009 Submission. This was stated to be a typing error, but does not inspire confidence in reliability of drafting.

Revise both 2009 Core Strategy and 2009 HAAP Issues/options

Chapter 12: Retail/Town centres

The Core Strategy misrepresents findings of the Retail and Leisure Study 2008.

Para.12.38 The Core Strategy states (para.12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace."

Whereas the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure".

2) (10.28) "There is no immediate capacity for additional floorspace".

3) (10.29) "we recommend focus be maintained on developing Hockley's existing strengths, rather than retail expansion"

4) 10.31 "the current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it has a very small catchment population. Accordingly, the council may wish to consider reclassifying Hockley from a town centre to a district centre".

Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

The Council will work with landowners and its partners to deliver the HAAP.

Remove threat of compulsory purchase orders.

Core Strategy Submission Document

O - 16709 - 7834 - Introduction, 4.8 - i

16709 Object

CHAPTER 4 Introduction, 4.8

One doesn't perceive impartiality when the Planning Director replies to local HAAP survey with "The affluent people of Hockley are entitled to famous name shops".

Chapter 5: Character of Place and Local Lists

Para.5.4 "Rochford district has unique character..stems from traditional buildings..still dominate towns and villages".

Para.5.17 "Council believes many buildings..are of local distinctiveness..part of..cherished local scene".

This only applies to favoured places: Rochford, Rayleigh, greenbelt villages. Many Hockley conservable items have been systemically removed for supposedly lucrative development in face of widespread protect. This is for supposed need for housing. In fact heritage items have been replaced by dwellings most cannot afford, and/or are hard to sell due to unsuitability of massing and siting. Many other homes are jeopardised by this practice.

HAAP issues 2009. Core Strategy 2006, 2007,2008, SCI.2006

Fewer 'vested interests', more even handedness. No more pressing people out of businesses, homes for expediency.

A CPRE Fieldwork issue extolled Local Lists, citing refusal of 16 flats to replace character house, not on local list. Inspector said house, facade made a contribution to area character, even if English heritage decided it didn't warrant listing. Council worked to get the house grade listed and even made adjacent area conservation one.

Hockley had one such on a "significant site" faced with 13 flats. Ward Member omitted house from refusal proposal, so house could be demolished. RDC dropped Local List ahead of appeal: "Government frowned on such Lists" (Other LAs, unaware of supposed directive retained theirs. After demolition RDC restored Local Lists, saying Government now support them. When Inspector queried the complaint, the then policy officer said "just politics, lot of local interest, nothing of character in the area[!]. (A dozen such items had been removed). Some "distinctive" Hockley buildings are still condemned (in Greensward Lane.; others threatened (Spa Road). Whereas a modest hue and cry in Rayleigh will usually result in a building being saved.

Conclusion

Core Strategy Submission DPD is basically unsound in many respects

Incomplete information. Amongst others, it refers to Hockley AAP, the first stage of which is complete, but not other three. Rochford AAP first stage has been published in arrears of Core Strategy Submission. Rayleigh AAP is still awaited. Precise housing sites are absent, as Urban Capacity Study 2007 has been superseded by Strategic Housing Land Availability Assessment, not yet published. Traders, residents, are thus responding to Core Strategy Submission with incomplete information.

Lack of community involvement. Chapter 1, Introduction, para. 1.11 "Community involvement is an essential part of the plan making process".

In Statement of Community Involvement 2006 Rochford RDC "recognises need to enable people to have their voices heard".

Re Public Meetings: "Consideration will be had to timing and venue to ensure meeting is as accessible as possible".

Take Hockley Area Action Plan as an example of the opposite of all this:- Presentation of document was at Hullbridge, 7.30pm. It was also discussed with JAAP at Rochford Freight House (for traders only) at 7am, without publicity. Excuse made: HAAP on RDC website, which none will seek unless knowing it is there. Rochford District Matters newsheet had minute articles on p.3, half way through consultation period. Another excuse: a 2nd presentation by Hockley Residents Association with planning officer present: only because of complaints, and it is not the HRA's responsibility to RDC's job. Due to unavoidable haste of calling meeting, few knew and only 50 were present.

In Core Strategy Submission Hockley Parish Plan has been ignored. Proposals also ignore 95% rejection rate response to HAAP 2009, which included proposals for Eldon Way employment site.

Unfettered right of developers to carry on as if Core Strategy didn't exist. In PPS 12, Ch.4.6 states: "Core Strategies should be flexible and able to show how they handle contingencies". Several large planning applications have been submitted proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS 12.

Where are we? Finally, at Chapter 1, Introduction, para. 1.24: "the Core Strategy will have to be reviewed in the event of a new Local Area Agreement, post-2011, setting different priorities". So what purpose does all this work serve? So we have hardly finished this exercise, before it all starts again?

Summary:

Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Core Strategy Submission Document

16709 Object

CHAPTER 4 Introduction, 4.8

Policy H1

Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2 you discarded N.E.Hockley as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley..along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

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Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Change to Plan Need to be logical and even-handed in proposals

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16741 - 14229 - Introduction, 4.8 - i, iii

16741 Object

CHAPTER 4 Introduction, 4.8

Respondent: Hockley Under Threat (J Abbey) [14229]

Hockley Under Threat
None provided

Agent: N/A

Full Text: Ch. 4 Housing; Ch.10 Transport, Highways; Ch.11 Economic Development; Ch.12 Retail/town centres; Ch.5 Character of place & Local Lists

Chapter 4: Housing

Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1, Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2

N.E.Hockley was discarded as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley...along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

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Policy H1, T1 Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG14 & PPS1. it also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths",

The Core Strategy also contravenes its own policy T1 and is unsound.

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

Establish like motorways with wholesale demolition.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts.

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Para.10.5

Policy T3, CLT1 Appendix CLT1

T1 & T2 "...highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which

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CHAPTER 4 Introduction, 4.8

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Para.1.25 Para.11.32

Policy ED4 T1 & T2 Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to accommodated employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

Remove compulsory relocation

Policy states Council will allocate 18ha of land to make up for de-allocations in ED3 - that proves point above.

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Revise both 2009 Core Strategy and 2009 HAAP Issues/options

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H1 & RTC6 Although shown on accompanying drawing in earlier versions, there was no prior textual mention of Foundry industrial estate (next to Eldon Way) for redevelopment until current CS 2009 Submission. In recent amendment to the CS this was stated to be due to a typing error!

Chapter 12: Retail/Town centres

The Core Strategy misrepresents findings of the Retail and Leisure Study 2008.

Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

Para.12.38 H1 & RTC6 The Core Strategy states (para.12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace."

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Core Strategy Submission Document

16741 Object

CHAPTER 4 Introduction, 4.8

shopping expenditure".

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In Core Strategy Submission Hockley Parish Plan has been ignored. Proposals also ignore 95% rejection rate response to HAAP 2009, which included proposals for Eldon Way employment site.

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Where are we? Finally, at Chapter 1, Introduction, para. 1.24: "the Core Strategy will have to be reviewed in the event of a new Local Area Agreement, post-2011, setting different priorities". So what purpose does all this work serve? So we have hardly finished this exercise, before it all starts again?

Summary:

Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1 Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2

N.E.Hockley was discarded as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley...along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

Core Strategy Submission Document

O - 16741 - 14229 - Introduction, 4.8 - i, iii

16741 Object

CHAPTER 4 Introduction, 4.8

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Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Change to Plan Need to be logical and even-handed in proposals

Appear at exam? Not Specified **Soundness Tests** i, iii

Core Strategy Submission Document

O - 15750 - 8830 - Introduction, 4.9 - ii

15750 Object

CHAPTER 4 Introduction, 4.9

Respondent: Mrs Audrey Stemmmons [8830]

18 Victor Gardens
Hawkwell
SS5 4DR
England
01702 200572

Agent: N/A

Full Text: It is true to say that these "settlements" do have their own identities and although not functionally separate from their neighbours, such identities would surely disappear and no individual invisible boundaries would remain should such immense development as required by the Core Strategy be implemented. As the higher tiers are already being more developed it does not make sense to increase the development in such areas in the future.

Summary: It is true to say that these "settlements" do have their own identities and although not functionally separate from their neighbours, such identities would surely disappear and no individual invisible boundaries would remain should such immense development as required by the Core Strategy be implemented. As the higher tiers are already being more developed it does not make sense to increase the development in such areas in the future.

Change to Plan I would suggest that tiers in the lower "settlements" would be more suitable for development.

Appear at exam? No **Soundness Tests** ii

Core Strategy Submission Document

O - 15931 - 7995 - Introduction, 4.9 - i, iii

15931 Object

CHAPTER 4 Introduction, 4.9

Respondent: Mr Alan Stone [7995]

180 Rawreth Lane
Rayleigh
Essex
SS6 9RN
United Kingdom
01268 784031

Agent: N/A

Full Text: Introduction 4.9 Spatial Characteristics, Issues and Opportunities

Quote from Core Strategy Document:

"These settlements/groups of settlements can be divided into four tiers, with the settlements in the higher tiers being more developed, subject to greater housing demand/need, and generally more suitable to accommodate additional housing for the reasons described above. The settlement hierarchy is as follows":

Tier Settlements

- 1 Rayleigh; Rochford/Ashingdon; Hockley/Hawkwell
- 2 Hullbridge; Great Wakering
- 3 Canewdon
- 4 All other settlements

In total, the document places 1020 dwellings in Rawreth (accepting the untruth statement that 550 are not actually in Rayleigh and 250 are not actually in Hullbridge). The other 220 dwellings are included using the proposal to be built on the brown-field site currently known as Rawreth Industrial Estate which is also in Rawreth.

The statement here does not portray the truth and therefore is unsound on the grounds, as stated in the document, "that the higher tiers are generally more suitable to accommodate additional housing for the reasons described above".

The table clearly shows that Rawreth is in Tier 4, thus not qualifying for a high level of development.

When RDC are questioned on this at council meetings, they always seem to skirt round it and never provide a satisfactory answer.

Summary: Rawreth qualifies as a Tier 4 settlement and should not be being considered for 1020 dwellings. This level of development is for Tier 1.

The ploy to class Rawreth as Rayleigh does not portray the true facts.

*** I disagree with these summaries, please read the full submission.

Change to Plan As Rawreth does not appear in 1,2,or 3 above, it must fall within 4. Therefore, it is in the category that is less suitable to accommodate additional housing and should be treated as such. Changes:- Reduce substantially the allocation for Rawreth.

Appear at exam? No

Soundness Tests i, iii

Core Strategy Submission Document

S - 16070 - 9599 - Introduction, 4.9 - None

16070 Support

CHAPTER 4 Introduction, 4.9

Respondent: Mrs Fiona Jury [9599]

WGDP Ltd
Cross Keys House
22 Queen Street
Salisbury
SP1 3EY

Agent: N/A

Full Text: We support the proposed settlement hierarchy, and recognition by the Council that the higher tiers should be subject to greater housing demand/need because of their sustainable credentials. This should be reflected in the proposed housing distribution.

Summary: We support the proposed settlement hierarchy, and recognition by the Council that the higher tiers should be subject to greater housing demand/need because of their sustainable credentials. This should be reflected in the proposed housing distribution.

Change to Plan N/A

Appear at exam? Not Specified

Soundness Tests N/A

Core Strategy Submission Document

S - 16166 - 14185 - Introduction, 4.9 - None

16166 Support

CHAPTER 4 Introduction, 4.9

Respondent: The JTS Partnership on behalf of John Bishop
[14185]

The JTS Partnership on behalf of John Bishop
Number One, The Drive
Great Warley
Brentwood
Essex
CM13 3DJ
United Kingdom

Agent: Mr Sean Marten [9337]

The JTS Partnership LLP
Number One, The Drive
Great Warley
Brentwood
Essex
CM13 3DJ
United Kingdom
01277 224664

Full Text: We support the four tiers of settlement hierarchy with the first tier comprising of Rayleigh, Rochford and Hockley. Hockley has already been identified as one of those settlements with a good range of services and facilities as well as access to public transport.

Summary: We support the four tiers of settlement hierarchy with the first tier comprising of Rayleigh, Rochford and Hockley. Hockley has already been identified as one of those settlements with a good range of services and facilities as well as access to public transport.

Change to Plan N/A

Appear at exam? Not Specified

Soundness Tests N/A

Core Strategy Submission Document

16466 Object

CHAPTER 4 Introduction, 4.9

Respondent: Rawreth Parish Council (Mrs H Bloomfield) [7342] **Agent:** N/A

Rawreth Parish Council
103 Downhall Park
Way Rayleigh
Essex
SS6 9QZ
01268 631821

Full Text:

LDF - Preferred Options - Rayleigh conurbation.

On behalf of Rawreth Parish Council I confirm that this letter is a formal response of objection to the final draft of Rochford District Councils Core Strategy Preferred Options document.

Firstly, at no time has the Parish of Rawreth been included or mentioned in any "Tier" on page 33 of the document, the criteria for allocation of houses - within the Core Strategy. If it had been included it should have been in Tier 4 and this is, therefore, UNSOUND.

The Parish Council believes that to develop 550 houses in one place within area no: 144, land to the north of London Road and then to add a further 220 to the Rawreth Industrial Estate area will totally destroy the character and rural outlook of Rawreth and surrounding areas. It will destroy the residents' "strong sense of identity within their own settlement" and is, therefore, UNSOUND.

The huge development of 550 houses is totally unacceptable. The land north of London Road is good quality agricultural land which is protected by the Green Belt -GB1 - fulfils all purposes under PPG2 and should be retained as such. Once used for development this land can never be returned to agricultural use, and if you continue to erode into our Green Belt and farmland it will be lost forever.

The Parish Council believe a proportion of the houses required to be built in our area should compliment and enhance Rawreth, cause as little extra congestion to our already heavily overcrowded roads as possible and provide a pleasant environment for those people wishing to move to the area. This particular area is part of the "Gateway to Rochford" and is the "strategic buffer" between Rayleigh and Wickford. Reference is made in the Core Strategy document to "avoiding coalescence" of villages/towns, however a development of this size immediately erodes the buffer between Rayleigh, Rawreth and Wickford, starts coalescence, destroys the rural character of Rawreth and, therefore, is UNSOUND.

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The roads and infrastructure in the Rawreth area are completely full to capacity. The A127, A1245, A129 London Road, Rawreth Lane and Watery Lane just cannot take any more traffic and the proposed development on land to the north of London Road will increase traffic to a completely unsustainable level. On numerous occasions this year incidents within and on the outskirts of the Parish have brought traffic to a standstill for hours along London Road, Rawreth Lane, Watery Lane/Beeches Road and the Hullbridge Road. It took some residents 1 ¼ hours to proceed along Rawreth Lane and into Hullbridge - a distance of 1 1/2 miles.

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Pages 34 to 36 "The efficient use of land for housing" and "Extensions to residential envelopes and phasing"

The Core Strategy Document states that "the Council recognises the importance of making best use of brownfield land" and "whilst the Council acknowledge that the housing requirement stipulated in the East of England Plan is a minimum, it must also be mindful of the need to maintain Green Belt as far as possible" yet the proposed 550 houses on the land

16466 Object

CHAPTER 4 Introduction, 4.9

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"The potential to avoid areas of constraint (such as areas at risk of flooding, sites of ecological importance"

"The historical, agricultural and ecological value of land"

"The potential to create a defensible Green Belt Boundary and

"The avoidance of coalescence with neighbouring settlements"

Yet these key factors all seem to have been ignored when choosing the site to the north of London Road and, therefore, the proposal is UNSOUND. The Parish of Rawreth has a history of flooding, the land in Rawreth Lane will drain into the already overloaded brook system and the Services in the area would be unable to cope with this increase in housing - drains and sewers are already working to capacity. Heavy rain earlier in the year resulted in flooding in Watery Lane and the Rawreth Brook system has been very close to flooding twice already this year. During a meeting between the Parish Council and the Environment Agency we were advised that this situation will worsen with increased housing.

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This section details the need for an allocation of 15 pitches by 2011, it also states that they "will examine the potential of current unauthorised sites to meet this need" and that "sites will be allocated in the west of the District" The west of the District is in fact Rawreth, but yet again the Parish name has not been detailed. The Parish already has an unauthorised site which is the subject of an enforcement case and although well kept is on the brow of a hill on a main highway with restricted access which Essex County Council have already raised concerns about, this is not a site that should be considered as part of the requirement due to its location, but also, why is the allocation of all 15 pitches being detailed to one area?

Page 43 to 44 "Appendix 1"

Details of all the infrastructure to accompany residential development is listed, yet there are no detailed costs, have these been done? And are these achievable? Large numbers of housing in one area, as stated in the infrastructure requirements, will necessitate a new primary school. County figures suggest that there will be surplus places in Rayleigh schools even with new housing. Obviously these will be in the wrong parts of the town so increasing the risk that an existing school could close. It makes sense to spread the development in smaller sites around the town, avoiding closure and preventing unnecessary provision of a new school.

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The document states that "The Council will continue to support the principals of restricting development in the Green Belt, as set out in PPG2 and will preserve the character and openness of the Green Belt" it further states that "a small proportion of the District's Green Belt will have to have its designation reviewed to allow development" The entire development of 550 houses planned for land north of London Road is all on Green Belt land as is the land at Hullbridge, how does this equate to a "small proportion"?

The Councils own Policy GB1- Green Belt Protection states "The Council will allocate the minimum amount of Green Belt land necessary to meet the District's housing and employment needs" and that they will "direct development away from the Green Belt as far as is practicable and will prioritise the protection of the Green Belt land based on how well the land helps achieve the purposes of the Green Belt".

This area of land confirms all 5 purposes of the national PPG2 - Green Belt:-

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Rawreth Parish Council have observed that there are a number of sites that were put forward in the "Call for Sites" that are pre-used brownfield land in the Green Belt land, and as such would prove beneficial and in their opinion should have been considered for development. Their non-inclusion as "brownfield" sites makes the current proposals

UNSOUND:

Site No; 73 Hambro Nursery a site of approximately 3.93 hectares, coupled with the adjacent site Clovelly, would provide between 200 and 250 houses in an area of approximately 4.85 hectares this area would have good access directly from the A1245 and if expanded north westward to include land up to and around the Village Hall, approximately another 2.08 hectares could produce between 50 and 80 further houses. This area could be accessed either from the slip road (Chelmsford Road) to the south of the Nevendon Garage or from Church Road.

Both of these sites would remove the need for extra traffic along the A129 and Rawreth Lane which are both already operating well over maximum capacity. This development would require a footbridge for pedestrians, cyclists and horses over the A1245.

Rawreth Parish Council believe these proposals would be sensible infill of these areas and would be on "Brownfield" sites where current businesses are not particularly progressive and would not result in the loss of many jobs. Our figures are quite conservative and we believe that if these sites were chosen a much reduced number of houses would need to be built "North of London Road" on Green Belt land.

Phase 2 - With regard to the houses that are proposed for the Northeast corner of Rawreth/Hullbridge, the Parish Council are concerned that any development would cause considerable extra congestion to the immediate roads. We understand that the thoughts are to "straighten" and improve parts of Watery Lane and Beeches Road to provide access to and through Battlesbridge - a conservation area. Recent experience of deep flooding in Watery Lane with the road closed for several days on 3 occasions in the early part of 2009 proves that this proposal is completely unsustainable. The local drainage systems simply cannot take the amount of run-off experienced now and with further development this

Core Strategy Submission Document

16466 Object

CHAPTER 4 Introduction, 4.9

would increase the problem.

If this development is to go ahead, the Parish Council believe that a relief road should be built, from the end of Watery Lane, skirting to the west of the Rayleigh Park Estate, crossing Rawreth Lane at a mini-roundabout and entering a vastly improved A129 at approximately Lower Barn Farm. This would take any necessary traffic in and out of the area efficiently.

The Parish Council further believe that the Michelins Farm site No: 49 would be an ideal site for the Rawreth Industrial Estate. This would adjoin proposed industrial sites within the Basildon District and would provide excellent road and transport links. Rawreth Parish Council also proposed that the land opposite Michelins Farm could be used to re-site the illegal Gypsy/Traveller site that is currently situated on the busy A1245. The land opposite Michelins Farm would not only be a much safer site for Gypsy/Traveller pitches, but the correct use of the land would also ensure the environmental improvement of the site as a whole.

All of the above proposals were submitted to Rochford District Council, but they were not taken into consideration in the final draft resulting in the predominant use of Green Belt land for development, bounded by already congested roads and, therefore, the proposals are UNSOUND.

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Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

16470 Object

CHAPTER 4 Introduction, 4.9

Respondent: Rawreth Parish Council (Mrs H Bloomfield) [7342] **Agent:** N/A

Rawreth Parish Council
103 Downhall Park
Way Rayleigh
Essex
SS6 9QZ
01268 631821

Full Text:

LDF - Preferred Options - Rayleigh conurbation.

On behalf of Rawreth Parish Council I confirm that this letter is a formal response of objection to the final draft of Rochford District Councils Core Strategy Preferred Options document.

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Core Strategy Submission Document

16470 Object

CHAPTER 4 Introduction, 4.9

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Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16478 - 8324 - Introduction, 4.9 - i, ii, iii

16478 Object

CHAPTER 4 Introduction, 4.9

Respondent: Mr J Needs & Aston Unit Trust [8324]

C/o Sellwood Planning
Stoughton Cross House
Stoughton Cross
Wedmore
Somerset
BS28 4QP

Agent: Sellwood Planning (Mr R M Sellwood) [5054]

Sellwood Planning
Stoughton Cross House
Stoughton Cross
Wedmore
Somerset
BS28 4QP

Full Text:

PPS12 (paras. 4.5, 4.15 and 4.16) states that Core Strategies should make clear spatial choices and take a long term view which is flexible so it can respond to changes in circumstances during the plan period. The submitted Rochford Core Strategy fails to do this which means it fails the soundness tests of being justified, effective and consistent with national policy.

The strategy is unsound since it does not include a policy setting out the settlement strategy. Whilst paragraph 4.9 of the Core

Strategy explains the four tiers of settlements in Rochford, this should be elevated to policy status and provide confirmation that the majority of new development will be directed to the tier 1 settlements (Rayleigh, Rochford / Ashingdon and Hockley / Hawkwell) with progressively less dwellings allocated to each subsequent tier. This is an essential bedrock of the strategy which is missing. Without such a policy, there is no guidance on where additional development land should be found if identified sites fail to come forward as expected. This means that the strategy fails to provide both guidance and flexibility.

Changes to make the plan sound.

New Housing policy H* "The location and scale of development in the District should comply with the Settlement Hierarchy. The Hierarchy should also be used by infrastructure providers to guide investment decisions.

Q7. Continuation

Settlement Type

Town

Function

Major focus for development in the District.

Suitable for the largest scale of development.

Settlements included

Rayleigh, Rochford / Ashingdon, Hockley / Hawkwell

Town

Rural Service Centre

Function

Main focus for development outside the towns.

Suitable for development that would reinforce the settlement's role as a provider of services for a wider rural area.

Settlements included

Hullbridge, Great Waking

Settlement Type

Primary Village

Function

Secondary focus for development in the rural area; suitable for a scale of development to serve that settlement and its immediate area.

Settlements included

Canewdon

Settlement Type

All other settlements

Function

Not suitable for development other than that which is small scale and for local needs."

Settlements included

All other settlements

It is considered that our participation at the oral part of the public examination would assist the Inspector for two main reasons

- Sellwood Planning has a detailed knowledge of the Rochford area, appeared at the last Local Plan Inquiry and was a participant at the RSS public examination. This direct knowledge of the local area and the statutory Development Plan may be of assistance to the Inspector

- Sellwood Planning has experience in promoting major schemes through Core Strategies (eg. 7,000 dwellings in Ashford, 5,750 dwellings in Dover, 2,500 dwellings in Horsham and 1,200 dwellings in Newmarket) and the emerging

Core Strategy Submission Document

O - 16478 - 8324 - Introduction, 4.9 - i, ii, iii

16478 Object

CHAPTER 4 Introduction, 4.9

Summary: body of evidence of what constitutes a sound Core Strategy and what is unsound. Our experience indicates that, in a number of respects, the submitted Core Strategy is unsound in its present form.

PPS12 (paras. 4.5, 4.15 and 4.16) states that Core Strategies should make clear spatial choices and take a long term view which is flexible so it can respond to changes in circumstances during the plan period. The submitted Rochford Core Strategy fails to do this which means it fails the soundness tests of being justified, effective and consistent with national policy.

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Change to Plan New Housing policy H*

"The location and scale of development in the District should comply with the Settlement Hierarchy. The Hierarchy should also be used by infrastructure providers to guide investment decisions.

Settlement Type

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Function

Major focus for development in the District. Suitable for the largest scale of development.

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Rural Service Centre

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Main focus for development outside the towns. Suitable for development that would reinforce the settlement's role as a provider of services for a wider rural area.

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All other settlements

Function

Not suitable for development other than that which is small scale and for local needs.

Settlements included

All other settlements

Appear at exam? Yes

Soundness Tests i, ii, iii

Core Strategy Submission Document

S - 16868 - 14274 - Introduction, 4.9 - None

16868 Support

CHAPTER 4 Introduction, 4.9

Respondent: Knight Developments [14274]

Knight Developments
C/o agent

Mr T Dodkins
Strutt & Parker
Coval Hall
Rainsford Road
Chelmsford
Essex

Agent: Strutt & Parker (Mr Trevor Dodkins) [8117]

Strutt & Parker
Coval Hall
Rainsford Road
Chelmsford
Essex

CM1 2QF

01245254603

Full Text:

See accompanying Strutt & Parker Planning Document and Cannon Consulting Initial Highways Access and Accessibility Statement.

(Council ref AE27 and AE27a)

Representation submitted in relation to proposed allocation of housing to the south west of Rayleigh and attendance required at examination to support the allocation of this site which is not in the submission document (see other responses to core strategy).

Summary:

See accompanying Strutt & Parker Planning Document and Cannon Consulting Initial Highways Access and Accessibility Statement.

(Council ref AE27 and AE27a)

Change to Plan N/A

Appear at exam? Yes

Soundness Tests N/A

Core Strategy Submission Document

S - 16900 - 14275 - Introduction, 4.9 - None

16900 Support

CHAPTER 4 Introduction, 4.9

Respondent: Southern and Regional Developments Ltd [14275] **Agent:** Strutt & Parker (Mr Trevor Dodkins) [8117]

Southern and Regional Developments Ltd
Unknown - represented by

Mr T Dodkins
Strutt and Parker
Coval Hall
Rainsford Road
Chelmsford
CM1 2QF

Strutt & Parker
Coval Hall
Rainsford Road
Chelmsford
Essex

CM1 2QF
01245254603

Full Text: See accompanying Strutt and Parker Planning Document, Cannon Consulting Transport Assessment and Flood Risk, Drainage and Services Report.

Council Ref AE29, AE29a and AE29b.

Representation submitted in relation to proposed allocation of housing to the south west of Hullbridge. Attendance at examination to support this allocation.

Summary: See accompanying Strutt and Parker Planning Document, Cannon Consulting Transport Assessment and Flood Risk, Drainage and Services Report.

Council Ref AE29, AE29a and AE29b.

Change to Plan N/A

Appear at exam? Yes **Soundness Tests** N/A

Core Strategy Submission Document

S - 16915 - 10009 - Introduction, 4.9 - None

16915 Support

CHAPTER 4 Introduction, 4.9

Respondent: Barratt Eastern Counties [10009]

Barratt Eastern Counties
Barratt House
7 Springfield Lyons Approach
Springfield
Chelmsford
Essex
CM2 5EY

01245 232200

Agent: Kember Loudon Williams Ltd (Mr Martin Hull) [8466]

Kember Loudon Williams Ltd
Ridgers Barn
Bunny Lane
Eridge
Tunbridge Wells

TN3 9HA
Engalnd
01892 750018

Full Text: Local Development Framework

Representations on the Core Strategy
Submission Document, November 2009
On behalf of Barratts Eastern Counties

Introduction

The requirements of Core Strategies are enshrined in the 2004 Planning and Compensation Act, the Town & Country Planning (Local Development) England (Regulations) 2004 and the 2008 policy guidance in PPS12. The requirements of Coe Strategies are clear. And they are legal requirements. The Core Strategy must comply with the Local Development Scheme, Statement of Community Involvement and the Regulations. The Core Strategy must be subject to a sustainability appraisal, have regard to national guidance, conform generally with the Regional Spatial Strategy and have regard to any Sustainable Community Strategy. A Core strategy must be sound - justified, effective and consistent with national policy. The following representations therefore focus on these legal requirements.

HOUSING

Paragraph 4.6 - Evidence Base

To meet the soundness test Submission Core Strategies (SCS) must be justified, that is to say it must be founded on robust and credible evidence base and comprise the most appropriate strategy when considered against reasonable alternatives. The housing strategy in as far as it identifies a need for Green belt sites is sound, however, there are other elements which are unsound.

Paragraph 4.6 notes that the Strategic Housing Land Availability Assessment (SHLAA) has examined the supply of housing. It is presumed that the Table at paragraph 4.6 is the outcome of this examination. Whilst the SHLAA has some legitimacy in that it identifies various sites that are apparently available, we are concerned that because the SHLAA was only published in November 2009 it post dates the SCS. This implies that the SCS is driving the SHLAA exercise rather than the other way round. Whilst this may have no real practical effect on the outcome of the SCS and the identified need for Green Belt sites, the Inspector will be mindful of the advice in paragraphs 33 and 54 of PPS3 that SCS draw on the evidence in SHLAA. It may be that the SCS should explain how the evidence base has been used to justify the strategy.

PPS12 explains at paragraph 4.37 that Core Strategies are based on thorough evidence. Since the SHLAA has only recently been published it is considered that the SCS is unsound as it is not justifiable. This, together with other comments on the SCS, indicates that the process should be delayed to ensure that a more robust document is placed in front of the EiP Inspector.

Table at Paragraph 4.6 - Evidence base

From our review of the available evidence it would appear that the housing land supply is insufficient and that Green Belt release are required. From the wider strategy being promoted we note that some of the sites that the District Council consider to be 'appropriate' are likely to relate to existing employment areas. As set out elsewhere in our representations, we maintain severe reservations that the redevelopment of existing employment sites for alternative uses and particularly the Eldon Way Industrial Estate is unsustainable. We will make reference to the effectiveness of this strategy in relation to sustainability, whether it is justified in the context of National Policy and the deliverability of such a strategy elsewhere.

In particular, paragraph 11.32 of the SCS refers to existing employment land and sites within the UCS. It does not refer the SHLAA and as such it appears that an evidence base to support the re-use of employment land for residential is not reported in the SCS.

Having reviewed the 2008 Annual Monitoring Report, as we did when commenting on the 2008 Preferred Options Core Strategy, we maintain severe doubts as to the appropriateness of some of the previously developed sites identified as potential housing sites and their expected housing yield. Whilst we cannot at this stage ascertain whether the SHLAA

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sites referred to in this table correlate with the Annual Monitoring Report and indeed the 2007 Urban Capacity Study, it is our view that there will be some commonality and so the reliance on these sites is likely to be at odds with Government Policy. We shall elaborate on this objection in relation to the specific housing policy below.

We note that the last two rows in the Table at paragraph 4.6 set out figures with and without Green Belt releases. The text to this section of the Core Strategy should, for reasons of clarity, explain that Green belt review will be necessary in order to deliver the required housing.

Paragraph 4.9

The table on page 40, which sets out the settlement tiers, is supported. Rayleigh, Rochford/Ashingdon, Hockley/Hawkwell are clearly the largest settlements in the District and they benefit from good employment, housing, leisure, community and public transport provision. These settlements are the most sustainable ones with the greatest mix of uses. Consequently, it is sensible that the Core Strategy identifies these as top tier settlements and is able to target them with growth accordingly. This component of the strategy is justified by reference to sustainability data and is effective, since targeting development at these locations will ensure a more sustainable pattern of development.

Paragraph 4.14

We maintain that the strategy for redeveloping the Eldon Way Industrial Estate for housing and other alternative uses to employment is unsound. It is neither justified nor effective. The Industrial Land Availability Study 2006 sets out on page 7 strategic objectives. The 3rd objective seeks to Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive. Clearly the strategy as currently drafted envisages major changes to existing industrial estates, including alternative uses. This strategy is not consistent with other strategies and evidence based studies and so cannot be justified in the context of the tests set out in PPS12. It is also an ineffective strategy since the new employment locations that would free up the Eldon Way site for redevelopment relies on transport infrastructure that has no certainty of being delivered. Principally, the erosion of employment uses at Eldon Way could make the settlement of Hockley/Hawkwell less sustainable and thus conflict with the tiered approach on page 40, paragraph 4.9.

Policy H1

Prioritising the use of previously developed land ("pdl") is supported in principle. It is a justified strategy in the context of PPS3 and effective as sequential choices can be made by implementing the policy. However, the District Council is also promoting a strategy which seeks the redevelopment of existing employment locations to alternative uses and by consequence is identifying green field sites for new employment development elsewhere (Policy ED4 refers). This 'land swapping' is not considered consistent with PPS3, nor is it considered to be justified or effective in delivering the desired strategy. This is particularly the case as most of the existing employment sites are occupied and therefore unavailable for redevelopment. In addition, the new Greenfield sites are in an arguably less sustainable locations away from the top tier settlements identified on page 40 of the Submission Core Strategy. Clearly this element of the strategy is inconsistent with the wider strategy.

The Industrial Land Availability Study 2006 is included as an evidence base by the District Council. It includes an introductory section, which explains that the authority wishes to make Rochford the place of choice for new business. It includes several strategic objectives on page 7 including "Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive." It reviews existing employment areas and identifies vacant land, including land available from allocations. It does not include any assessment of new sites or potential opportunities for new sites that might have been expected to feed into the Core Strategy. The strategy for identifying Green Belt site employment allocation does not appear to be based on any evidence in this document and in that context cannot be justified. The strategy being promoted potentially conflicts with Government policy in PPG13, PPG2 and emerging PPS4.

The Employment Land Study 2008 is a much later document. It has a key recommendation on page ii "we recommend that Rochford District Council adopts strong policies to protect existing employment land." Furthermore under recommendations for existing sites on page iii-iv of that document it states "In our view, Hockley Trading Centre is a strategically well placed employment location. However, we recognise the ambitions of the Hockley Town Centre masterplan and that within this the Council should consider it to be allocated for other uses. However, we recommend that this reallocation happen only if provision is made within the masterplan for office use within Hockley Town Centre as part of a mixed use scheme." The view of the writers of this document is clear - the Eldon Way Industrial estate (Hockley Trading Centre) is a good employment site and that it is for other reasons that alternative uses are being considered and only then if office development is supported. This supports our representations that new future uses at the Eldon Way site should be employment dominated and that alternative uses should relate to the objectives of the Town Centre which is to enhance the shopping and leisure facilities. Residential is not an appropriate alternative.

This document recommends the use of land to the west of Rayleigh for employment and envisages Green belt release. However, the SCS does not explain through the evidence base why existing employment sites should be 'deallocated' and Green belt land unnecessarily used.

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In addition to these key issues we have some specific concerns. As a consequence we maintain an objection to the second paragraph of Policy H1. This policy states that the Council will seek the redevelopment of various industrial estates including Eldon Way. The Policy says that alternative uses will be sought (presumably alternative to the existing employment offer) and that new land will be allocated elsewhere. This policy statement, in relation to Eldon Way in particular, is unsound for a number of reasons:

The emerging Hockley Area Action Plan consulted upon in 2008 states that the Eldon Way Industrial Estate is strategically well placed. In a sense this statement underplays the true importance of this highly sustainable employment location and only major employment area in Hockley/Hawkwell. The employment area is adjacent to the railway station and located a short distance from the main bus routes that run along Spa Road. Some of the residential areas of the town are also within walking distance of this commercial area, thus providing a potential for sustainable travel by employees. The Eldon Way Industrial Estate is therefore right at the heart of the settlement of Hockley/Hawkwell and provides an opportunity to meet sustainable transport objectives by reducing the need to travel by car. Consequently, this employment area should be highlighted as a premier employment site in sustainability terms, both in the context of PPG13, PPG4 and PPS6. To encourage alternative uses as set out in Policy H1 implies the removal of the majority of employment based activity at Hockley/Hawkwell and this would be contrary to National policy, would not be the most appropriate strategy when considered against alternatives and is therefore unsound.

Whilst it is acknowledged that improvement to the Eldon Way Industrial Estate can and should take place, the extent to which the mix of employment uses should be altered in favour of alternative land uses requires careful consideration. It is our view that a mix of existing or indeed new employment land uses with some Town Centre type uses should dominate the Eldon Way site. A mix of employment types between offices, light industry and other high technology industries should be encouraged as this will provide many locational advantages to the firms that agglomerate together. The Council says that the existing uses on this site are harmful to amenity. However, the site has operated for many years without any significant issues and if renewal for B1 type uses are encouraged then the employment area can be maintained without harm to amenity. Renewal of the employment stock can help develop and improve trade, improve the sustainability of businesses as a whole and make for a more flexible labour market as skill levels are varied. A singularly different use altogether or a variety of uses which excludes employment could undermine the long term sustainability of the area and Town Centre. As such Policy H1 is not an effective strategy and should be amended to acknowledge the importance of Eldon Way and the need to renew the employment stock to ensure that the site maintains its important role as a employment site, albeit with some ancillary alternative use development where appropriate.

The 2008 Retail Study notes that Hockley Town Centre is not strong and there is trade leakage. Eldon Way Industrial Estate provides a customer base for existing town centre uses. Weekday spending within town centres is an important contributor to the viability of many retail and leisure businesses either through expenditure by employees during the lunchtime trade or expenditure by employers, on necessary goods and services. This relationship helps sustain the critical mass of a centre and provides a platform for new retail and leisure growth. It is important to have a balanced centre with a variety of uses. Policy H1, as currently drafted, implies the removal of employment related development and this is likely to harm the vitality and viability of Hockley Town Centre. The Council has presented no evidence to suggest that this is not the case. Importantly, the 2008 Retail Study explains that there is a need for additional retail and office space. In principle we would support additional office and other B1 type uses plus retail but employment uses should always dominate for the sustainability reasons given above. Retail and office development are likely to present a viable alternative to some of the more industrial type uses.

Consequently, we do not support the phrasing of the third paragraph of Policy H1 and maintain that the most appropriate strategy is to seek renewal of the employment stock with employment based uses and with some new retail development. Removal of employment land uses completely as currently implied-which was the approach adopted in the emerging Hockley Area Action Plan - is not a justifiable strategy.

One of the key tests of a Core Strategy is consistency between policies in the emerging Plan and this strikes at the heart of demonstrating an effective strategy. Policy H1 implies alternative uses to employment and the relocation of Eldon Way to a site identified under Policy ED4. However, Policy RTC6 sets out a suite of policy criteria for Hockley Town Centre which includes employment and commercial activities. In addition Policy ED3 seeks the protection of sustainable employment sites (Eldon Way) and notes that some reallocation of existing employment sites will include a proportion of employment. It notes that in the case of Eldon Way employment development will form a component. The policies appear at odds with one another. The third paragraph of Policy H1 should be deleted as the second paragraph is sufficient to set a strategic context for delivering new housing development. The employment policies and Hockley specific policies should be left to consider the type and quantum of land uses appropriate in the area. If the third paragraph of H1 is to be retained then it should tie in more with Policy RTC6 and in our view explain that employment uses should dominate any redevelopment proposals for the Eldon Way site and that retail and leisure uses should be a supporting proportion.

Implementation, Monitoring and Delivery - page 132 onwards

One of the key tests of soundness is that the Core Strategy should be effective - it should be able to deliver its strategy. The Implementation strategy set out at page 132 onwards of the Core Strategy does not explain how Policy H1, RTC6 and the strategy for redeveloping Eldon Way (Policy ED2 and ED3) will be delivered. The comment at Policy ED3 on

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page 161 identifies it as a potential risk and alludes to land assembly difficulties and the choices to be made by owner/occupiers. In order to deliver the strategy there should be a clear understanding as to whether the new land use values being promoted are sufficient to encourage relocation voluntarily. Secondly there is a need for more information to be gathered and presented to show that current occupiers and landowners are willing to relocate and the timescales likely for this. For example, do the building lease contracts enable early review or are there any break out clauses. There should be some commentary on whether the Council will engage in compulsory purchase orders to pursue their strategy should the 'encouragement' route fail. As currently drafted there is no clear path to deliver the strategy and the danger is that despite reallocation, the sites identified for redevelopment will not come forward in the plan period. In this regard, evidence to satisfy the test of soundness is not provided.

Policy H2 - General Locations

We support the strategy that new housing growth should be targeted at land South of Hawkwell. This area is suitably located to the urban area of Hockley/Hawkwell and to tie in with the settlement tiers on page 40 of the Submission Core Strategy the same terminology for settlement should be used. This ensures a consistency within the SCS. The choice of this location as a housing growth area is appropriate as it would not contribute to the coalescence of the urban area with Ashingdon (there is existing development between this identified housing area at Rectory Road and Ashingdon and moreover, Rectory Road can form a natural physical boundary for the new Green belt boundary. This area is also well located to the existing road network. Cherry Orchard Way has recently been improved and provides much better accessibility to the proposed housing growth area than any other location around Hockley/Hawkwell. The existing bus routes along Rectory Road also make this location sustainable and the additional housing proposed will help underpin the financial viability of bus routes in this area. Locally there are employment opportunities, including the small commercial estate off Main Road. The Eldon Way Industrial Estate adjacent to the Town Centre also provides the opportunity for employment locally. Extensive public open space, play pitches and built leisure facilities are located just to the north of this area and a community hall is located off Briar Close, nearby. The area to the south of Hockley/Hawkwell is close to local shops on the corner of Heycroft Road and Main Road and there are numerous footpath links between this area and the local community including links via Thorpe Road, Thorpe Close, Briar Close, Hawkwell Park and Park Gardens. The area therefore provides the opportunity to enhance existing links, including cycle links, and contribute towards community integration - more so than other sites on the south side of this settlement. The site is also in the control of one house builder and deliverable.

However, we find that the Policy is not fully consistent with national policy and furthermore needs to be reviewed in order to be justified and effective. We have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with this policy and feel that Green Belt review should be more explicit throughout the SCS. We note that it is only Policy H3 which indicates the need for Green Belt land review. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H2 and certainly Policy H3 and Policy GB1 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary.

Policy H2 - Phasing and Quantum

The 2008 Preferred Core Strategy document indicated that the area south of Hawkwell should deliver 330 dwellings over a phasing period to post 2021 (see Policy H2 and H3 of that document). The SCS reduces the quantum of housing in this area to 175 but expects delivery by 2015. At a broader level the Preferred Options Core Strategy of 2008, (Policy H2) required 1,450 dwellings to 2015 and a further 1,050 by 2021. In the SCS the figures are now 775 and 1,010 respectively.

Since the SHLAA post dates the publication of the SCS, we are uncertain as to the reason why such a significant reduction in quantum of housing and extensions to the residential envelope is considered necessary. Presumably it is the 'new' strategy to redevelop existing employment areas within the settlements that has led to this change. Our representations on this strategy and specifically the Eldon Way Industrial Estate are included elsewhere within our representations. Previously we have commented on the Table at paragraph 4.6 of the Submission Core Strategy and the lack of evidence to underpin that table. It seems odd that in the space of a year the expected requirement for Greenfield sites has effectively halved on the basis of a SHLAA exercise. The community is therefore not able to effectively

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comment on the housing land supply and at this stage the Submission Core Strategy is legally unsound.

That said, we are of the view that the quantum of housing envisaged south of Hockley/Hawkwell should be more than the 175 currently envisage. In coming to this view we have reviewed the Urban Capacity Study and the latest housing figures in the Annual Monitoring Report 2008. We conclude that the shortfall in housing land supply is such that 330 dwellings in this location is appropriate.

The recently published SHLAA is based upon the data obtained from the Urban Capacity Study 2007, a call for sites exercise and data from the Annual Monitoring Report 2008.

The 2007 Urban Capacity Study (UCS)

1. 2007 is widely recognised as being the peak level of house prices in the UK and it was acknowledged by Government and practitioners alike that 2007 house prices were at an unsustainable level. It is our view that utilising the 2007 UCS as an evidence base without reference to the market does not pick up the depressed demand that is likely to now exist. Recent corrections to the housing market now mean that housing land prices are at a much lower and arguably more affordable level than before. The implications are that some pdl may not be viable for housing development. Often brownfield sites have much higher development costs than Greenfield sites and so the yield from urban capacity will be much lower than anticipated in the 2007 study. One example is the employment allocation of the Adopted Local Plan located at 76-92 Main Road, Hawkwell. This site has been allocated for several years and has been available during the most recent rises in residential property prices during 2006-07. As a consequence the lack of progress on the site can only be described by its current occupancy and perhaps it comprises high value uses that do not encourage redevelopment. Despite this the site is identified as having high potential for alternative use and high potential demand. The SHLAA form notes that there is no information on legal constraints (e.g., tenancy agreements) As a consequence it is difficult to see how this could continue to be a potential site and as a consequence the allowance for green field releases should be increased.

2. There are considered to be other instances in the UCS and the recently published SHLAA where the assumptions and calculations would indicate that the 1301 urban capacity figure is over optimistic and the SHLAA assessment is limited. In the assessment of 'non-residential sites in appropriate locations' within the UCS assumptions are made as to the probability of sites coming forward for new housing. 68-72 West Street, Rochford is identified as a high probability site but we note that it has been subject to 7 refusals of planning permission/conservation consent. There is a significant gap between the urban capacity identified as being suitable by the Council and the capacity applied for by the owners. Given its alternate use value, it is debateable whether the two capacity figures can be reconciled. No 247 London Road is another example of a site allocated in the Local Plan but which hasn't come forward. This is now the subject of a proposal for a care home and if approved would further limit the scope for market/affordable housing capacity on the site. A striking example of how the urban capacity study has underestimated is also evidence by 2-4 Alderman's Hill, Hockley - described as a disused service station. There has been no residential development application on this site since 2004 and most recent applications have sought commercial use of the site. Rather than being evidence of housing land deliverability, this particular site evidences the need for commercial uses in the area. There are therefore deliverability doubts over these 'high probability' categories which amount to some 40 units.

3. In relation to the assessment in the UCS entitled 'intensification of existing residential uses' we note that the assessment is premised on an assessment of recent trends taking into account net completions between 2001-2006 and 2005-06. This is effectively an assessment of windfall trends and not an approach that PPS3 encourages. Importantly Table 3-12 in the urban capacity study seeks to project forward urban capacity from residential redevelopment - a period that benefited from high house prices and PPG3 guidance encouraging redevelopment. These two circumstances have markedly changed and so the assumptions and conclusions drawn would also have changed. Even taking into account the UCS discounting, the reliability of the 404 units from this source must be questioned and in our view the 1301 figure cannot be a sound basis for urban capacity and further Greenfield releases are necessary.

4. In the section of the UCS entitled 'subdivision of dwellings' and 'living above the shop' it is estimated that recent trends would result in 7 and 15 units. Our concerns with using trends as a basis for urban capacity are detailed above - PPS3 does not encourage this. Rather, local authorities are charged with surveying their areas, identifying which areas may yield urban capacity and how much and developing policies to achieve that. Government guidance does not encourage the estimation of windfalls in the way the UCS does.

5. Redevelopment of established employment land is a separate section within the UCS. At 1 above we identify the low probability of the Main Road residential allocation coming forward. This remaining section of the UCS considers 11 further employment sites which were first identified in the 2000 UCS. Three of these are considered to have a high probability of coming forward. We have looked at these three sites and can find no evidence that they are likely to come forward. In the 8 years between 2000 and 2008 the three identified high probability employment sites have not been developed and there is no reason to assume that the next 5-10 years will be any different. For example the Rawreth Industrial Estate is identified as being well used in the UCS and although it has some unneighbourly uses there is no indication that the site is available, suitable or deliverable for residential. Land between 39-69 Lower Lambricks, Rayleigh is identified as having a high probability of residential uses. Yet there is no

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evidence of any pre-application advice or planning applications for this area. Stambridge Mills, Mill Lane, Stambridge is a further example. This site is separated from the urban area, in a flood risk zone and protected in the 2006 Replacement Local Plan by Policy EB9 which promotes B1 uses. Against this background there is only two relevant planning applications affecting this area both date from the early 1990's and relate to a plant room and loading bay. There is no evidence that this is likely to come forward for residential purposes in the next 5-10 years.

6. In the UCS extant permissions are identified as 856 dwellings. It is important to note that this figure needs to be continually reassessed so that from the point of adoption of the Core Strategy a 5 and 10 year housing land supply is available. The SHLAA notes extant permissions for 2009-14 being 106. As noted below extant permissions do not necessarily translate into deliverable sites. There is therefore a contingency that needs to be built in. Further allocations on greenfield land need to be increased and as such the quantum of housing in the area south of Hockley/Hawkwell should be increased to 330 dwellings in order to begin to meet the shortfall identified.

The District Council's 5 year housing supply assessment

7. The District Council's Annual Monitoring Report ("AMR") 2008 purports to demonstrate a 5 year housing land supply. The preamble to Table 4.10 in the AMR 2008 explains that Rochford District Council ("RDC") has included units under construction, units with full permission, units with outline permission, units with a resolution to grant, units subject to preapplication discussion/Urban Capacity Assessment and land allocations in its trajectory. The reader is referred to Appendix B which breaks down the sites in more detail. The recently published SHLAA also includes a table showing a potential 1273 dwellings deliverable. However, it refers to "appropriate brownfield sites." Since these 'appropriate sites' are do not benefit from an application or a planning permission it is difficult to programme them into the housing delivery trajectory.

8. In the full planning permission category of the AMR 2008 where work has not yet started there can be no guarantee that all these sites will be delivered in the 5 years. This comment relates to the one above in relation to the recently published SHLAA. It is not uncommon for permissions to be obtained to provide a means for valuing a site where the owner has no immediate plans to sell the site or develop housing. Delivery may also be hampered by funding constraints, or site assembly problems (where sites are in an alternative use or relocation constraints). Appendix B of the AMR 2008 does not set out the intentions of the landowner or whether the sites are truly achievable in the 5 year period as per PPS3 requirements. The SHLAA purports to show developer intentions at Appendix C but the assessment by the local authority into the legitimacy of some of the claims is not presented. The evidence base is not as full as it should be to demonstrate the robustness of Table 4.6 of the SCS. It is also unclear the extent to which this table is based on either the UCS 2007, AMR 2008, SHLAA 2009 or a combination of all three. This should be set out clearly.

9. In addition, to the 'non delivery' of a proportion of new homes in the AMR 2008, there is concern at the timings of delivery in that data set, for example, 10 units in 2008-2009 relates to outline planning permissions and it is doubtful whether reserved matters can be turned round quick enough to begin delivering housing in this year period. There could well be examples in that set of data where the delivery of units in the first year of the 5 is unlikely, thus delivery is reduced for that period and pushed back and this process is then compounded throughout the data set up to and beyond year 5. Statistical evidence from the Department of Communities and Local Government ("CLG") reveals that building starts are 43% down on the quarter to March 2009 compared with March 2008. It is not clear whether the recently published SHLAA has taken this into account and unless it does the data in the Table at 4.6 of the SCS cannot be relied upon, particularly given the current recessionary circumstances. In relation to the Table at Paragraph 4.6 a refinement is therefore needed to take into account this effect on phasing.

10. This problem is compounded for other units relied upon where permission has been granted but no start on site has been made; this accounts for a considerable number of sites in 2009-10 period (100 dwellings) which is (year 2 of the 5 year period). A delay in these will require more Greenfield sites to be identified in order to meet the shortfall.

11. Finally we note that the East of England Plan expresses its land supply requirement as a minimum. This strategy is not reflected in the

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Submission version of the Core Strategy policy H2.

12. In summary since neither the UCS nor the Annual Monitoring Report form a SHLAA, reservations are maintained about the degree to which sufficient housing land has been identified.

Policy H3

In the Preferred Options Core Strategy 2008 more locations were identified for housing growth in the post 2021 phase. Whilst it is our view that land south of Hockley/Hawkwell should benefit from a greater number of dwellings than the 175 currently identified (330) in order to make the strategy effective. We are concerned at the significant change in strategy between the Preferred Option Core Strategy and the Submission version, which has significantly less housing growth on green field sites. This change in strategy is so significant that we would question whether it is appropriate in the context of soundness and the consultation processes that have taken place so far.

We also have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with other policies in the SCS and feel that Green Belt review should be more explicit throughout the SCS. As it currently stands there is a potential conflict with national policies and limited justification for the Green belt strategy. We note that in Policy H3, which indicates the need for Green Belt land review, the advice is limited and unclear. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H3 and Policy GB1/H2 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary. Not to do so is unsound for justification and effectiveness reasons.

Policy H4 - Affordable Housing

As currently drafted we feel that the policy is not concise enough and that the policy does not reflect current guidance. The phrase 'at least' would indicate that in most cases affordable housing above 35% will be sought. Our understanding is that the 35% figure is recommended in the SHMA and that to provide a policy framework which seeks to go beyond that figure would potentially be unworkable as many sites could not financially bare the burden of over a third of the net developable area not yielding a value. The policy should be redrafted so that "a target of 35% affordable housing shall be provided on all developments of 15 or more units..."

The last policy paragraph provides some scope to relax this policy, if there are clear site constraints that make on site provision impossible. The policy, though, is not particularly clear on what would constitute exceptional circumstances. For example, physical site constraints, which unusually raise development costs, would be one such reason and this should be specified. There may be other reasons including the nature of housing needs in the part of the District the site is located which justify affordable housing below the 35% target. Design reasons may also have a bearing on how provision is made and in what form, particularly if the site is in an historic area where design might override housing need argument. It is therefore recommended that the policy expand on the type of circumstances where affordable housing may be relaxed and the type of information that will be sought of applicant's who have a need to invoke this part of the policy.

Policy H5

In support of the policy, it is advantageous that no percentages requiring a specific mix are included. This flexibility will enable developers and the Council to respond directly to changing circumstances in the local housing market. In the past some authorities have set out a percentage for the type of housing they require only to find that after a few years of strict implementation there is an oversupply of property of that type and no flexibility in the policy to address the problem.

Policy ED2 - London Southend Airport

It is considered that to grow non aviation related employment at a location north of Southend Airport where sustainable access from the rest of Rochford District requires careful consideration. Most Airports are serviced by aviation related employment development and as such a location close to the airport is sensible and sustainable. However, for surface access reasons it would be inappropriate to encourage travel from Rochford's main settlements to what essentially

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would be a rural location for general employment uses. Whilst sustainable access would be improved by a railway station and better bus links, there is no evidence to suggest that a sustainable surface access strategy for non related employment development at the Airport can be achieved. Paragraph 11.22 explains the critical importance of a railway station to the delivery of the strategy yet the Transport Chapter and Implementation Chapter provide neither a policy nor an assessment of deliverability. It is also notable that the South Essex Rapid Transit Policy T4, as set out at paragraph 10.16, notes that Rochford is not proposed to be served but may be served in future phases. This uncertainty is no way to plan for a major employment land supply strategy in the District. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley/Hawkwell, Rochford and Rayleigh is unsound.

Policy ED3

We fully support the first sentence of the Policy and note the apparent contradiction with the statements in Policy H1 and elsewhere which seeks to develop on alternative uses at industrial estates such as Eldon Way.

This contradiction is evidence in the second paragraph of Policy ED3. In our representations on Policy H1 we have explained why it is not sound to diminish the employment stock at Eldon Way and the importance of maintaining a dominance of employment type uses at this estate. These arguments are not repeated here.

We note the sentiments of the third paragraph and in accordance with our representations elsewhere are of the view that this sentence should be revised to explain that Eldon Way will accommodate principally employment type uses. As noted elsewhere uses which are an alternative to employment would diminish this highly sustainable employment site and this is unsound when assessed against National Policy.

Policy ED4 - Future Employment Allocations

In part, the de-allocation strategy is not supported as it is considered unsound when set against sustainability criteria. In relation to the Eldon Way Industrial Estate it is considered critical to the ongoing sustainability of this settlement that employment uses are maintained at this location. It is close to the railway station, bus routes and local residential areas from which the opportunity exists for employees to walk or cycle to work. Its location adjacent to the Town Centre offers opportunity for some retail and leisure development to complement the centre and to maintain a supporting function. These sustainable benefits would not occur with the deallocation of Eldon Way or the significant erosion of its employment floorspace. Whilst redevelopment of the employment site to achieve new employment is supported, the dominant land use should continue to be employment use. As a consequence, the 18ha of land required for employment in this policy is considered to be excessive and the policy should be reviewed to explain that redevelopment of existing employment sites for primarily new employment development will be encouraged.

Policy T4

It is noted that the South Essex Rapid Transit policy, as elaborated upon at paragraph 10.16 notes that Rochford is not served but may be served in future phases. This uncertainty is contrary to the delivery principles of soundness and directly puts at issue the employment land supply strategy in the District which is founded on sustainable access to new sites. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley, Rochford and Rayleigh is unsound.

Appendix H1, CTL1 - Infrastructure

It is recognised that necessary infrastructure provision is an important part of creating a sustainable development and in that context appendix H1 is supported. The supporting text notes that the table at Appendix H1 is not exhaustive and in that context it is very important that the framework properly distinguishes between what should be provided as part of new development schemes and what shouldn't. It is therefore essential that the framework acknowledges the importance of Circular 05/05 and the tests which say that provision of infrastructure and/or contributions should be:

- * Relevant to planning
- * Necessary to make the proposed development acceptable in planning terms
- * Directly related to the proposed development
- * Fairly and reasonably related in scale and kind to the proposed development
- * Reasonable in all other respects

As is made clear (Paragraph B9 of Circular 5/05) contributions should not be used to make good existing deficiencies in infrastructure provision. Nor are they to be used to secure contributions to the achievement of wider planning objectives that are not necessary for consent to be granted. In that context the Core Strategy should set this out as its policy framework.

Policy GB1 - Green Belt

16915 Support

CHAPTER 4 Introduction, 4.9

The objectives of this policy are supported, although as noted in other representations the SCS is unsound as it does not meet the tests in relation to justification, compliance with national policy or effectiveness of strategy.

Policy GB1 mentions the objective to allocate the minimum amount of Green Belt land necessary. The policy should link to the requirements of PPG2 and RSS which are discussed in relation to the representations on Policy H2 and H3. The policy should set out a timeframe for the review and why Rochford requires a Green Belt review (what the exceptional circumstances are in this District that justify a review of local boundaries. The policy should be amended to set out a 2031 time frame and this may require the SCS to have an extended life span beyond 2021.

We would recommend the deletion of the word character since Green Belt designation is not related to landscape character as currently drafted. For clarity we would also recommend that the Policy or its supporting text explain that a Green Belt review will take place in support of an allocations document (paragraph 6.6) in order to identify an appropriate new boundary. This is particularly necessary given the commitment to a Green belt review in the adopted Local Development Scheme.

Policy CLT1 - Planning Obligations and Standard Charges

In view of the need to test fully the basis on which standard charges are based it is important that any document produced is in a development plan document that enables an examination in public. The policy should explain this in order that when the document is produced it accords with Policy and is based on sound evidence.

ENV9 - Code for Sustainable Homes

Object. The advice from the Department of Communities and Local Government is that the new requirement to have a rating against the Code does not make it mandatory to build a Code home or to have each new home assessed against the Code. It does however mean that all buyers of new homes be given clear information about the sustainability of the new home. A house builder can do this in one of two ways:

- they can choose to build a Code home, have that home assessed against the Code and provide the home buyer with a Code certificate stating the star rating the home has achieved
- or, they can choose to build to current building regulations standards, not to pay for an assessment and instead download a nil-rated certificate of non-assessment (also referred to as a nil-rating) to provide to the home buyer.

As such the Rochford policy requirement that coding 3 be achieved by 2010 and Code 6 by 2013 is out of step with Government advice. The policy wording should explain that it is just the coding that is a requirement of new homes and not necessarily that new homes should be constructed to achieve a standard.

The current Government objectives are for the code to be introduced over a reasonable period with development to be code 3 by 2010, code level 4 by 2013 and code level 5 by 2016. In this regard the policy, as drafted, seeks to achieve code 6 by 2013 and consequently compresses the code requirements into a shorter time scale with the costs associated expected to be subsumed within the housing market through higher prices. This is not a realistic strategy for the delivery of sustainable homes and we consider that the policy should be revised to extend the period of compliance but to also make it more flexible based on local circumstances.

Research undertaken on behalf of the Housing Corporation and English Partnerships, published in February 2007 'A cost review of the code for sustainable homes' reveals that code 6 is unlikely to be unattainable given existing technologies and that achieving code 5 could result in a 12% to 20% increase in costs that would have to be passed onto the consumer. Given the variability of the housing market with peaks and troughs, it is unlikely that the housing market would be able to subsume this level of price increase.

The code system policy as currently drafted does not have regard to site circumstances and so many of the requirements could be difficult to meet. For example, micro electricity generation on site may be difficult to achieve where local circumstances deter the capture of wind or solar power. If more expensive technologies are required to generate power than is the norm then costs will rise. There may be other competing reasons why designs cannot include certain sustainability measures if housing sites are in sensitive landscape and historic locations. Alternatively there may be significant development costs associated with site specific circumstances and so viability of the site's development becomes a valid consideration. By insisting on the code for sustainable homes other policy objectives such as affordable housing at particular rates and other contributions may need to be reconsidered. Consequently, we are of the view that this policy should be drafted in a manner which enables site specific circumstances to be taken into account. As noted above the Government explains that the code is a certification requirement and does not necessarily mean that buildings are constructed in accordance with a code level.

It is also important to note that it is not the purpose of planning legislation to duplicate other legislation. In this regard, the policy should accept that the Building Regulations will be the main vehicle for implementing this policy and that unless the coding requires external development then there will be no need to specify what is to be carried out in a planning application.

Core Strategy Submission Document

S - 16915 - 10009 - Introduction, 4.9 - None

16915 Support

CHAPTER 4 Introduction, 4.9

Summary: Paragraph 4.9

The table on page 40, which sets out the settlement tiers, is supported. Rayleigh, Rochford/Ashingdon, Hockley/Hawkwell are clearly the largest settlements in the District and they benefit from good employment, housing, leisure, community and public transport provision. These settlements are the most sustainable ones with the greatest mix of uses. Consequently, it is sensible that the Core Strategy identifies these as top tier settlements and is able to target them with growth accordingly. This component of the strategy is justified by reference to sustainability data and is effective, since targeting development at these locations will ensure a more sustainable pattern of development.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16609 - 5219 - Introduction, 4.10 - i, ii

16609 Object

CHAPTER 4 Introduction, 4.10

Respondent: Fairview New Homes Ltd [5219]

Fairview New Homes Ltd
50 Lancaster Road
Enfield
Middlesex
EN2 0BY
020 83661271

Agent: Planning Potential (Miss G Brickwood) [7549]

Planning Potential
Palace House
3 Cathedral Street
London
SE1 9DE
0207 357 8000

Full Text: Representations on behalf of Fairview New Homes

1. We are instructed by our client, Fairview New Homes, to submit comments on the published Core Strategy Submission Document. For ease specific reference has been made in accordance with the paragraph and policy numbers as contained in the published document. We would like the opportunity to represent our Client at the forthcoming Examination of the Core Strategy DPD and would be grateful for confirmation that this is possible.

2. Fairview New Homes have an interest in a parcel of land to the South West of Rayleigh Town Centre, as indicated on the attached site location plan. This land was previously identified in the Core Strategy Preferred Options documents to provide an urban extension to the south west of Rayleigh. This option has now been withdrawn in the Core Strategy Submission document and it is on this basis these representations are provided to the Council.

3. The Submission Core Strategy has been considered against the requirements set out at Paragraph 4.36 of PPS12 requiring core strategies to be justifiable and effective in order to be found sound, as follows:

Justified:

- i. Founded on a robust and credible evidence base
- ii. The most appropriate strategy when considered against the reasonable alternatives

Effective:

- i. Deliverable - the Core Strategy should show how the vision, objectives and strategy for the area will be delivered and by whom, and when, including who is responsible for implementing different elements of the strategy and when
- ii. Flexible - a strategy is unlikely to be effective if it cannot deal with changing circumstances. Plans should show how they will handle contingencies.
- iii. Able to be monitored - monitoring is essential for an effective strategy and will provide the basis on which the contingency plans within the strategy would be triggered.

4. To summarise our comments, Fairview New Homes strongly object to the Core Strategy as is currently presented on the basis the document is currently unsound for a number of reasons:

â€¢ The lack of robust and credible evidence base

â€¢ Failure to clearly discount reasonable alternatives

â€¢ The effectiveness of the plan is also considered to be flawed and the Council's approach to deliverability and flexibility is questioned.

5. Fundamentally, we question the soundness of the Core Strategy due to the lack of available evidence to support the choices made by the Council. In particular, there is a strong reliance on the findings of the 2009 Strategic Housing Land Availability Assessment (SHLAA) although it is understood this document is not due to be published for consideration alongside the Core Strategy. We, therefore, reserve the right to submit additional comments to the Core Strategy consultation following the publication of the SHLAA.

6. The 2009 SHLAA is clearly listed at Paragraph 1.29 of the submission Core Strategy as one of the evidence base documents the Council have drawn upon when drafting the Core Strategy. The documents listed are all considered to have played an important role in informing the Core Strategy. PPS12 also recognises at Paragraph 4.37 the importance of demonstrating how choices made in the plan are backed up by factual evidence identified in evidence base documents.

7. As a starting point it is important to state it is Fairview New Homes greatest concern there is no background provided within the Core Strategy document, or indeed any of the available evidence base documents, identifying why the Local Planning Authority has chosen to remove some of the sites previously proposed for housing development. In addition, there is also no justification as to why the retained urban extension sites are more suitable than those removed from the draft plan.

8. The following provides specific comments in response to the relevant areas of the Core Strategy.

Housing

9. It is stated at Paragraphs 4.10-4.12 that the Council have adopted a balanced approach when locating new housing between higher tier settlements and lower tier settlements. Although there is no detail provided as to how the Council

16609 Object

CHAPTER 4 Introduction, 4.10

intend on implementing this balanced approach or how the strategic allocation of housing contributes to the balance required. Our Client cannot support this approach until further detail is understood as to the proportion of housing being allocated to each settlement tier.

10. The proposed distribution of housing development during the plan period does not appear to be proportionately allocated between the various settlement tiers. We would argue that development should be distributed proportionately in line with the size of the settlement in order to benefit for available services and facilities. Rayleigh recognised as having best access to services within the district at Paragraph 2.68 of the Core Strategy. On this basis it is considered the development should primarily be directed to Rayleigh with a proportionate level of housing to the remaining settlements in the District.

Policy H1 - The efficient use of land for housing

11. In general the use of residential extensions to meet the remaining housing requirement that cannot be delivered through the redevelopment of appropriate previously developed land is supported by Fairview New Homes.

12. It is understood there is a need to prioritise use of brownfield land in line with national policy requirements but this needs to be a carefully balanced and realistic approach in identifying appropriate urban extensions to accommodate the majority of the District's housing, as identified in the table at Paragraph 4.6 and later at Paragraph 4.15.

13. Policy H1 sets out that the Council will seek the redevelopment of Rawreth Lane Industrial Estate, Foundry Industrial Estate, Stambridge Mills and Star Lane Industrial Estate. Without sight of the 2009 SHLAA it is not possible to understand whether the Council's choice to release employment land for housing is appropriate and Fairview New Homes cannot, therefore, support this element of Policy H1. This objection is further amplified by the fact additional employment land is required but is yet to be identified.

Policy H2 - Extensions to residential envelopes and phasing

14. The Council's intention to provide a balanced strategy for housing provision is mentioned again at Paragraph 4.18. The comments made at Paragraphs 9 and 10 above are also relevant in this respect.

15. In comparing the Preferred Options Core Strategy Document and Submission Core Strategy Document there is a significant reduction in the number of housing units being provided in urban extensions pre 2015, from 1450 dwellings to 775. From discussions with the Local Planning Authority it is understood the Council are seeking to provide the District's housing requirements by increased development densities. From the evidence available in the Submission Core Strategy and summary of SHLAA sites a number of the sites identified as urban extensions have in fact been allocated a reduced number of dwellings, including the land to the north of London Road, Rayleigh. We would, therefore, consider the approach taken by the Local Planning Authority to provide the required level of housing is untenable and unjustified.

16. In discounting preferred options PPS12 makes clear at Paragraph 4.38 the requirement for Local Planning Authorities to consider and evaluate reasonable alternatives. As set out above, the choices the Council have pursued have not been substantiated and without the consideration of reasonable alternatives the Core Strategy cannot be considered justified and therefore unsound.

17. However, this is our opinion based only on discussions with the Local Planning Authority rather than a thorough evidence base and we will consider the evidence in detail when it become available and provide further comment.

18. Paragraph 4.19 of the draft Core Strategy details the Council's primary factors in determining the location of future urban extensions. It is presumed the Council have assessed each of the proposed urban extension sites against the following criteria and that this information is contained within the SHLAA, although we have not been provided with any evidence of this to assess. It can be demonstrated that the land identified on the attached site location plan meets all of the requirements set out below.

â€¢ The proximity and relationship to existing centres, facilities, services

â€¢ The availability of infrastructure and/or the potential for additional infrastructure to be provided for development in such areas

â€¢ The potential to reduce private car dependency

â€¢ The potential to avoid areas of constraint (such as areas at risk of flooding, sites of ecological importance, public safety zone etc)

â€¢ The historical, agricultural and ecological value of land

â€¢ The impact on highway network (including availability and impact on existing network, as well as potential for improvements to be delivered)

â€¢ The relationship of development locations to the District's area of employment growth

â€¢ The potential to create a defensible Green Belt boundary

â€¢ The avoidance of coalescence with neighbouring settlements

19. In summary, Fairview's land is sustainably located in particularly close proximity to Rayleigh Town Centre and train station. In addition, the location of the land provides a natural extension and rounding of settlement boundary. An extension to Rayleigh in this location offers no opportunity for coalescence with neighbouring settlements nor does it constitute urban sprawl.

16609 Object

CHAPTER 4 Introduction, 4.10

Policy H2 - Extensions to residential envelopes and phasing

20. Although it is stated a flexible approach to the timings of the release of land will be maintain no explanation is provided as to why some sites are considered suitable for development pre 2015 and others post 2015. Paragraph 4.22 elaborates further to state a number of factors have been considered when determining the phasing of strategic housing sites although this information is not clearly available to assess.

21. As stated above the principle of releasing certain areas of greenbelt land is considered the best approach to meeting the Council's housing provision requirements. However, Fairview New Homes object to the omission of the land to the South West of Rayleigh for housing development as previously identified in the Core Strategy Preferred Options document. The site identified on the attached site location plan has been assessed against the Council's criteria, as set out at Paragraph 18 above and each requirement can be met. Without any clear explanation as to why this site has been discounted and the only other strategic housing site identified in Rayleigh is located further away from Rayleigh Town Centre and the associated services and facilities including the train station, Fairview New Homes object to Policy H2.

22. As considered at the outset of these representations the draft Core Strategy cannot be considered robust, and therefore sound, without clear justification and evidence base.

Policy H3 - Extension to residential envelopes post-2021

23. Policy H3 is supported on the basis that the release of greenbelt land is required for housing and this is the most appropriate approach to meet the Council's housing requirements, as set out at Paragraph 21 above.

24. However, it is unclear why some of the sites previously identified for housing development pre 2015 up until 2021 in the Preferred Options Core Strategy document have now been allocated for development post 2021, such as South East Ashingdon. It is stated at Paragraph 4.24 of the Submission Core Strategy document those areas identified for post 2021 development may not be immediately deliverable. However, there is no information available to understand why these sites are now no longer considered suitable for pre 2015 development as they were in December 2008. As a result, Fairview New Homes consider Policy H3 to be unjustified and therefore unsound.

Affordable Housing

25. The acute need for additional affordable housing is recognised at Paragraph 4.30. It is unclear from the draft Core Strategy document exactly how much affordable housing is required in the District in the plan period.

26. However, taking the starting point as set out at Paragraph 4.30 that the Thames Gateway South Essex Strategic Housing Market Assessment requires 131 net additional affordable dwellings per year which constitutes 52% of the District's overall annual housing target. In order to achieve this target using the Council's proposed policy requirement that new housing developments are to provide 35% affordable housing, 375 new dwellings would need to be developed each year. This calculation does not account for those developments with fewer than 15 dwellings which have no requirement to provide affordable housing or developments which cannot viably afford to provide non-market housing.

27. An annual requirement of 250 dwellings is identified at Paragraph 4.2 of the Core Strategy which would leave a significant short fall of affordable housing and act to compound the current situation. The approach taken by the Council ultimately accepts there will always be a shortfall in affordable housing provision and does not seek to redress this. We do not, therefore, consider this to be a robust or justified approach to achieving affordable housing in the District.

28. It is, therefore, considered in order to meet the District's affordable housing requirement additional housing land should be identified in order to ensure a wholesale increase in housing provision to address the Council's shortfall in affordable housing and meet the targets set for the plan period. The most appropriate and effective method by which to secure affordable housing provision is through developing large sites that are viably able to offer affordable housing units.

29. During the consultation of the submission Core Strategy the Council's Housing Strategy (2009) was not available and we reserve the right to make further comment on this document following the publication of this evidence.

The Green Belt

30. It is fully accepted by the Council that the Green Belt boundary is currently too tightly drawn and the release of some Green Belt land is necessary to meet the District's development requirements. However, it needs to be demonstrated that the areas of Green Belt land to be lost are justified and located in the most appropriate area and that areas of release land do not undermine the principle of the Green Belt.

31. It is understood from Paragraph 6.7 of the Submission Core Strategy the Council will seek to examine the degree to which current Green Belt land is helping to achieve the purposes of the Green Belt when considering reallocating land. However, areas of Green Belt are proposed to be reallocated for urban extensions prior to this research being undertaken.

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O - 16609 - 5219 - Introduction, 4.10 - i, ii

16609 Object

CHAPTER 4 Introduction, 4.10

32. Fairview New Homes fully support the justified retention of the areas of Green Belt where appropriate and the release of Green Belt land where needed. However, at present the proposed Housing policies and Green Belt policies are not coherent and the reallocation of certain areas of Green Belt is not based on a credible evidence base.

Environmental Issues

Policy ENV4 - Sustainable Drainage Systems (SUDS)

33. Fairview New Homes would like to support the flexibility contained within Policy ENV4 which recognises it is not always viably possible to incorporate SUDS in all developments.

Policy ENV8 - On Site Renewable and Low Carbon Energy Generation

34. We would also like to support Policy ENV8 on the same basis as Policy ENV4 in that it is important that the production of energy from renewable or low carbon sources is only required where it is viably possible so as not to resulting in developments not coming forward.

Transport

Policy T8 - Parking Standards

35. Fairview New Homes object to Policy T8 as it is currently contrary to National Policy requirements as set out in PPG13 which contains maximum parking standards. Indeed, this is recognised at Paragraph 10.27 of the Submission Core Strategy document. Enforcing minimum parking standards is not consistent with local or national sustainability aims and should not be an approach pursued by the Council.

Summary:

Housing

9. It is stated at Paragraphs 4.10-4.12 that the Council have adopted a balanced approach when locating new housing between higher tier settlements and lower tier settlements. Although there is no detail provided as to how the Council intend on implementing this balanced approach or how the strategic allocation of housing contributes to the balance required. Our Client cannot support this approach until further detail is understood as to the proportion of housing being allocated to each settlement tier.

10. The proposed distribution of housing development during the plan period does not appear to be proportionately allocated between the various settlement tiers. We would argue that development should be distributed proportionately in line with the size of the settlement in order to benefit for available services and facilities. Rayleigh recognised as having best access to services within the district at Paragraph 2.68 of the Core Strategy. On this basis it is considered the development should primarily be directed to Rayleigh with a proportionate level of housing to the remaining settlements in the District.

Change to Plan

Appear at exam? Yes

Soundness Tests i, ii

Core Strategy Submission Document

O - 15788 - 8435 - Introduction, 4.11 - i, ii, iii

15788 Object

CHAPTER 4 Introduction, 4.11

Respondent: Mr Andrew Allen [8435]

36 connaught road,
Rayleigh
ss68ux
uk

Agent: N/A

Full Text: I do not agree that RDC's approach to the location of housing can be considered balanced given that it appears to favour a limited number of huge extensions to the residential envelope. I believe that there are opportunities to utilise a larger number of smaller sites, around the existing settlements. These would result in less traffic having to travel via town centres to destinations of Basildon, Southend and Chelmsford, less requirement for investment in the necessary infrastructure, and have a more balanced impact to existing settlements by spreading expansion around.

Summary: I do not agree that RDC's approach to the location of housing can be considered balanced given that it appears to favour a limited number of huge extensions to the residential envelope. I believe that there are opportunities to utilise a larger number of smaller sites, around the existing settlements. These would result in less traffic having to travel via town centres to destinations of Basildon, Southend and Chelmsford, less requirement for investment in the necessary infrastructure, and have a more balanced impact to existing settlements by spreading expansion around.

Change to Plan Provide the evidence and proof of RDC diligence necessary to enable meaningful public scrutiny.

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

S - 15970 - 13441 - Introduction, 4.11 - None

15970 Support

CHAPTER 4 Introduction, 4.11

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: The balanced allocation strategy, reflecting the influence of service centres both within and outside the district, is welcome.

Summary: The balanced allocation strategy, reflecting the influence of service centres both within and outside the district, is welcome.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16120 - 7984 - The efficient use of land for housing - i

16120 Object

CHAPTER 4 The efficient use of land for housing

Respondent: Hockley Parish Plan Group (Mr T Gleadall) [7984] **Agent:** N/A

Hockley Parish Plan Group
2 Wood End
Hockley
Essex
SS5 4QL
01702 202892

Full Text: HPPG believes that due to shortage of available building land, housing development in and around Hockley should be minimal, and must include starter homes and affordable housing. Hockley must remain as a distinct community with clear boundaries and green spaces between Hockley and neighbouring parishes. Town centre development must maintain the village character of Hockley, and include specialist shops. It must consider suitable facilities for people with disabilities.. Historic and listed buildings must be preserved. It is essential that the countryside in and around Hockley, including wods, footpaths, bridleways, play areas, playing fields and nature reserves are preserved 100%.

Summary: HPPG believes that due to shortage of available building land, housing development in and around Hockley should be minimal, and must include starter homes and affordable housing. Hockley must remain as a distinct community with clear boundaries and green spaces between Hockley and neighbouring parishes. Town centre development must maintain the village character of Hockley, and include specialist shops. It must consider suitable facilities for people with disabilities.. Historic and listed buildings must be preserved. It is essential that the countryside in and around Hockley, including wods, footpaths, bridleways, play areas, playing fields and nature reserves are preserved 100%.

Change to Plan The proposal f additional housing is unsound as Hockley is already overdeveloped and there is very limited building land available in Hockley.

Appear at exam? No

Soundness Tests i

Core Strategy Submission Document

O - 16471 - 7342 - The efficient use of land for housing - i

16471 Object

CHAPTER 4 The efficient use of land for housing

Respondent: Rawreth Parish Council (Mrs H Bloomfield) [7342] **Agent:** N/A

Rawreth Parish Council
103 Downhall Park
Way Rayleigh
Essex
SS6 9QZ
01268 631821

Full Text:

LDF - Preferred Options - Rayleigh conurbation.

On behalf of Rawreth Parish Council I confirm that this letter is a formal response of objection to the final draft of Rochford District Councils Core Strategy Preferred Options document.

Firstly, at no time has the Parish of Rawreth been included or mentioned in any "Tier" on page 33 of the document, the criteria for allocation of houses - within the Core Strategy. If it had been included it should have been in Tier 4 and this is, therefore, UNSOUND.

The Parish Council believes that to develop 550 houses in one place within area no: 144, land to the north of London Road and then to add a further 220 to the Rawreth Industrial Estate area will totally destroy the character and rural outlook of Rawreth and surrounding areas. It will destroy the residents' "strong sense of identity within their own settlement" and is, therefore, UNSOUND.

The huge development of 550 houses is totally unacceptable. The land north of London Road is good quality agricultural land which is protected by the Green Belt -GB1 - fulfils all purposes under PPG2 and should be retained as such. Once used for development this land can never be returned to agricultural use, and if you continue to erode into our Green Belt and farmland it will be lost forever.

The Parish Council believe a proportion of the houses required to be built in our area should compliment and enhance Rawreth, cause as little extra congestion to our already heavily overcrowded roads as possible and provide a pleasant environment for those people wishing to move to the area. This particular area is part of the "Gateway to Rochford" and is the "strategic buffer" between Rayleigh and Wickford. Reference is made in the Core Strategy document to "avoiding coalescence" of villages/towns, however a development of this size immediately erodes the buffer between Rayleigh, Rawreth and Wickford, starts coalescence, destroys the rural character of Rawreth and, therefore, is UNSOUND.

The Core Strategy Document details Rochford District Councils priorities and objectives and details how the role of the Core Strategy features in achieving these. In support of the Parish Councils observations and alternative proposals they comment as follows.

Page 5 "Fostering greater community cohesion"

Development of land between Rawreth Lane and north of London Road will not give any community cohesion at all, it will simply be an extension to the west of Rayleigh giving residents no real sense of belonging, they will live within the Parish of Rawreth, yet they will be considered as living in Rayleigh as has been proved with other developments along Rawreth Lane such as Laburnum Way.

Page 12 "Priority 5 Essex roads are safer less congested and everyone has access to essential services"

The roads and infrastructure in the Rawreth area are completely full to capacity. The A127, A1245, A129 London Road, Rawreth Lane and Watery Lane just cannot take any more traffic and the proposed development on land to the north of London Road will increase traffic to a completely unsustainable level. On numerous occasions this year incidents within and on the outskirts of the Parish have brought traffic to a standstill for hours along London Road, Rawreth Lane, Watery Lane/Beeches Road and the Hullbridge Road. It took some residents 1 ¼ hours to proceed along Rawreth Lane and into Hullbridge - a distance of 1 1/2 miles.

The proposed development at the western edge of Hullbridge, which is, in fact, largely in Rawreth would also greatly increase the traffic problems in the area. Rawreth Parish Council understand there would be a proposal to "widen/straighten" Watery Lane/Beeches Road, with a roundabout at the junction with the Hullbridge Road. This is an extremely dangerous junction even at the present time and would become increasingly so. There is also the question of where the traffic would go when it reaches Battlesbridge at the Western end, it cannot possibly cross the Bridge as this is "restricted" and in a Conservation Area, therefore, it would have to turn left and proceed to the A1245 - a very dangerous junction.

Beeches Road/Watery Lane is also shown in the document as a new cyclist route. Surely this is a conflict of interest, a road widening/straightening proposal coupled with a cycle route.

Page 33 "Tier Settlements"

Nowhere in the Core Strategy Document is Rawreth Parish actually mentioned, it features in the "all other settlements tier 4" and is referred to as "land north of London Road Rayleigh" or "West Rayleigh" yet, the housing allocation of 550 dwellings between 2015 and 2021 and the 220 planned for the Rawreth Industrial Estate is the largest that any area is taking. Rawreth Parish currently has 380 dwellings and an electorate of 812, yet the proposed housing figures are set to increase the overall number of dwellings in the Parish by 203%.

Pages 34 to 36 "The efficient use of land for housing" and "Extensions to residential envelopes and phasing"

The Core Strategy Document states that "the Council recognises the importance of making best use of brownfield land" and "whilst the Council acknowledge that the housing requirement stipulated in the East of England Plan is a minimum, it must also be mindful of the need to maintain Green Belt as far as possible" yet the proposed 550 houses on the land

16471 Object

CHAPTER 4 The efficient use of land for housing

north of London Road will all be built on Green Belt land of high agricultural value. The document states that "the Council will direct development to the most sustainable locations on the edge of settlements having regard to:"

"The potential to avoid areas of constraint (such as areas at risk of flooding, sites of ecological importance"

"The historical, agricultural and ecological value of land"

"The potential to create a defensible Green Belt Boundary and

"The avoidance of coalescence with neighbouring settlements"

Yet these key factors all seem to have been ignored when choosing the site to the north of London Road and, therefore, the proposal is UNSOUND. The Parish of Rawreth has a history of flooding, the land in Rawreth Lane will drain into the already overloaded brook system and the Services in the area would be unable to cope with this increase in housing - drains and sewers are already working to capacity. Heavy rain earlier in the year resulted in flooding in Watery Lane and the Rawreth Brook system has been very close to flooding twice already this year. During a meeting between the Parish Council and the Environment Agency we were advised that this situation will worsen with increased housing.

Page 42 "Gypsy and Traveller Accommodation"

This section details the need for an allocation of 15 pitches by 2011, it also states that they "will examine the potential of current unauthorised sites to meet this need" and that "sites will be allocated in the west of the District" The west of the District is in fact Rawreth, but yet again the Parish name has not been detailed. The Parish already has an unauthorised site which is the subject of an enforcement case and although well kept is on the brow of a hill on a main highway with restricted access which Essex County Council have already raised concerns about, this is not a site that should be considered as part of the requirement due to its location, but also, why is the allocation of all 15 pitches being detailed to one area?

Page 43 to 44 "Appendix 1"

Details of all the infrastructure to accompany residential development is listed, yet there are no detailed costs, have these been done? And are these achievable? Large numbers of housing in one area, as stated in the infrastructure requirements, will necessitate a new primary school. County figures suggest that there will be surplus places in Rayleigh schools even with new housing. Obviously these will be in the wrong parts of the town so increasing the risk that an existing school could close. It makes sense to spread the development in smaller sites around the town, avoiding closure and preventing unnecessary provision of a new school.

Page 57 "Strategies, Activities and Actions - The Green Belt"

The document states that "The Council will continue to support the principals of restricting development in the Green Belt, as set out in PPG2 and will preserve the character and openness of the Green Belt" it further states that "a small proportion of the District's Green Belt will have to have its designation reviewed to allow development" The entire development of 550 houses planned for land north of London Road is all on Green Belt land as is the land at Hullbridge, how does this equate to a "small proportion"?

The Councils own Policy GB1- Green Belt Protection states "The Council will allocate the minimum amount of Green Belt land necessary to meet the District's housing and employment needs" and that they will "direct development away from the Green Belt as far as is practicable and will prioritise the protection of the Green Belt land based on how well the land helps achieve the purposes of the Green Belt".

This area of land confirms all 5 purposes of the national PPG2 - Green Belt:-

It prevents the unrestricted sprawl of western Rayleigh

It provides a barrier to prevent the ultimate merging of Rayleigh, Rawreth and Wickford

It assists in safeguarding the countryside from encroachment

It preserves the setting and special character of historic towns

Assists in urban regeneration, by encouraging the recycling of derelict and other urban land

Rawreth Parish Council have observed that there are a number of sites that were put forward in the "Call for Sites" that are pre-used brownfield land in the Green Belt land, and as such would prove beneficial and in their opinion should have been considered for development. Their non-inclusion as "brownfield" sites makes the current proposals

UNSOUND:

Site No; 73 Hambro Nursery a site of approximately 3.93 hectares, coupled with the adjacent site Clovelly, would provide between 200 and 250 houses in an area of approximately 4.85 hectares this area would have good access directly from the A1245 and if expanded north westward to include land up to and around the Village Hall, approximately another 2.08 hectares could produce between 50 and 80 further houses. This area could be accessed either from the slip road (Chelmsford Road) to the south of the Nevendon Garage or from Church Road.

Both of these sites would remove the need for extra traffic along the A129 and Rawreth Lane which are both already operating well over maximum capacity. This development would require a footbridge for pedestrians, cyclists and horses over the A1245.

Rawreth Parish Council believe these proposals would be sensible infill of these areas and would be on "Brownfield" sites where current businesses are not particularly progressive and would not result in the loss of many jobs. Our figures are quite conservative and we believe that if these sites were chosen a much reduced number of houses would need to be built "North of London Road" on Green Belt land.

Phase 2 - With regard to the houses that are proposed for the Northeast corner of Rawreth/Hullbridge, the Parish Council are concerned that any development would cause considerable extra congestion to the immediate roads. We understand that the thoughts are to "straighten" and improve parts of Watery Lane and Beeches Road to provide access to and through Battlesbridge - a conservation area. Recent experience of deep flooding in Watery Lane with the road closed for several days on 3 occasions in the early part of 2009 proves that this proposal is completely unsustainable. The local drainage systems simply cannot take the amount of run-off experienced now and with further development this

Core Strategy Submission Document

O - 16471 - 7342 - The efficient use of land for housing - i

16471 Object

CHAPTER 4 The efficient use of land for housing

would increase the problem.

If this development is to go ahead, the Parish Council believe that a relief road should be built, from the end of Watery Lane, skirting to the west of the Rayleigh Park Estate, crossing Rawreth Lane at a mini-roundabout and entering a vastly improved A129 at approximately Lower Barn Farm. This would take any necessary traffic in and out of the area efficiently.

The Parish Council further believe that the Michelins Farm site No: 49 would be an ideal site for the Rawreth Industrial Estate. This would adjoin proposed industrial sites within the Basildon District and would provide excellent road and transport links. Rawreth Parish Council also proposed that the land opposite Michelins Farm could be used to re-site the illegal Gypsy/Traveller site that is currently situated on the busy A1245. The land opposite Michelins Farm would not only be a much safer site for Gypsy/Traveller pitches, but the correct use of the land would also ensure the environmental improvement of the site as a whole.

All of the above proposals were submitted to Rochford District Council, but they were not taken into consideration in the final draft resulting in the predominant use of Green Belt land for development, bounded by already congested roads and, therefore, the proposals are UNSOUND.

Summary:

Pages 34 to 36 "The efficient use of land for housing" and "Extensions to residential envelopes and phasing" The Core Strategy Document states that "the Council recognises the importance of making best use of brownfield land" and "whilst the Council acknowledge that the housing requirement stipulated in the East of England Plan is a minimum, it must also be mindful of the need to maintain Green Belt as far as possible" yet the proposed 550 houses on the land north of London Road will all be built on Green Belt land of high agricultural value. The document states that "the Council will direct development to the most sustainable locations on the edge of settlements having regard to:"

"The potential to avoid areas of constraint (such as areas at risk of flooding, sites of ecological importance"

"The historical, agricultural and ecological value of land"

"The potential to create a defensible Green Belt Boundary and

"The avoidance of coalescence with neighbouring settlements"

Yet these key factors all seem to have been ignored when choosing the site to the north of London Road and, therefore, the proposal is UNSOUND. The Parish of Rawreth has a history of flooding, the land in Rawreth Lane will drain into the already overloaded brook system and the Services in the area would be unable to cope with this increase in housing - drains and sewers are already working to capacity. Heavy rain earlier in the year resulted in flooding in Watery Lane and the Rawreth Brook system has been very close to flooding twice already this year. During a meeting between the Parish Council and the Environment Agency we were advised that this situation will worsen with increased housing.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 15745 - 9496 - The efficient use of land for housing, 4.13 - i, ii, iii

15745 Object

CHAPTER 4 The efficient use of land for housing, 4.13

Respondent: Mr K Tipler [9496]

48 Golden X Road
Ashingdon
Essex
SS4 3DG
UK
01702 548624

Agent: N/A

Full Text: Comments: Re: Core Strategy Pre-Submission Consultation - Regulation 27 of the Town & Country Planning Regulations 2008.

I would like to take the opportunity to make a general comment on the current recommendations to build residential property on 'green belt' areas.

When it is decided that more land is needed for additional housing it seems sensible to give preference to sites in the 'green belt' that are not suitable or economically viable for agricultural or horticultural use. The current planning restrictions on use mean that little account is taken of the quality or suitability of the land. The result is that unsuitable land that can't be made viable generally is just left as scrub or wasteland.

Summary: If priority were given to building on these types of plots this I believe would result in smaller and more spread out developments. This would have a less significant overall impact on the community, infrastructure, and the environment than the larger scale developments proposed over large areas of open farmland.

If the council actively seek to identify this type of land and encourage building here it will save productive farm land that we may well need in the future, and also make use of land that would not be utilizable.

Change to Plan More emphasis should be placed on individual plot suitability for housing development and less on general land areas deemed as green belt or other classification without regard to former use or suitability or impact on the community.

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 15879 - 14103 - The efficient use of land for housing, 4.13 - i, iii

15879 Object

CHAPTER 4 The efficient use of land for housing, 4.13

Respondent: Mrs Sharon Morris [14103]

Brent Lodge, Woodham Road,
Battlesbridge,
Wickford,
Essex
SS11 7QW
United Kingdom
01245320368

Agent: Mrs Sharon Morris [14103]

Brent Lodge, Woodham Road,
Battlesbridge,
Wickford,
Essex
SS11 7QW
United Kingdom
01245320368

Full Text: Clovelly Works and Hambro Nursery are brownfield sites that carry support of local Parish Council, District Councillors and MP.

Summary: Clovelly Works and Hambro Nursery are brownfield sites that carry support of local Parish Council, District Councillors and MP.

Change to Plan Housing will be built on Clovelly Works and Hambro Nursery as substitution for some of the houses proposed at the London Road site.

Appear at exam? Yes **Soundness Tests** i, iii

Core Strategy Submission Document

O - 16239 - 9836 - The efficient use of land for housing, 4.13 - i, ii, iii

16239 Object

CHAPTER 4 The efficient use of land for housing, 4.13

Respondent: mr Stephen Coombs [9836]

Agent: N/A

52 laburnum way
rayleigh
ss6 9gn
england
01268786860

Full Text: With regards to the proposed sites West of Rayleigh and Hullbridge,(which are actually in Rawreth) the plan is unsound, unsustainable and contrary to Policy H1 and guidance under the East of England Plan in that these are almost entirely on greenbelt farmland when brownfield sites are available. Infrastructure is inadequate for current demand, particularly roads, transport and sewerage/run-off. This plan would virtually treble the population of Rawreth and increase dependence on private vehicles which would result in gridlock of London Road, Rawreth Lane and surrounding feeder roads.

Summary: With regards to the proposed sites West of Rayleigh and Hullbridge,(which are actually in Rawreth) the plan is unsound, unsustainable and contrary to Policy H1 and guidance under the East of England Plan in that these are almost entirely on greenbelt farmland when brownfield sites are available. Infrastructure is inadequate for current demand, particularly roads, transport and sewerage/run-off. This plan would virtually treble the population of Rawreth and increase dependence on private vehicles which would result in gridlock of London Road, Rawreth Lane and surrounding feeder roads.

Change to Plan Develop available brownfield and previously developed land.

Appear at exam? No

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 15704 - 12588 - The efficient use of land for housing, 4.14 - i

15704 Object

CHAPTER 4 The efficient use of land for housing, 4.14

Respondent: Mrs Wendy Davies [12588]

Agent: N/A

7 Park Gardens
Hawkwell
Hockley
Essex
SS5 4HE
UK
07711887410

Full Text: The use of the Eldon Way/Foundry Estate site in Hockley is unsound, as the local facilities especially relating to Cully's Gym and the Sorting Office (for collecting parcels that cannot be delivered), would be lost to local residents. The airport site is too far to travel for these facilities. Cully's Gym is available for local elderly and disabled people as well as for the general public. There is a fairly large population of these demographic groups in and around Hockley. Extra housing on these sites would increase pressure on the roads, which are already congested at peak times. The shopping facilities in the village would not be able to cope with more housing, unless substantially diversified and developed.

Summary: Loss of local facilities for elderly and disabled residents & pressure on local roads

Change to Plan Consider fewer housing units and retaining facilities that are used by local residents

Appear at exam? No

Soundness Tests i

Core Strategy Submission Document

O - 15872 - 14095 - The efficient use of land for housing, 4.14 - i

15872 Object

CHAPTER 4 The efficient use of land for housing, 4.14

Respondent: Mrs Gaynor Davey [14095]

3 Downhall Park Way
Rayleigh
Essex
SS6 9QP
o1268 784360

Agent: N/A

Full Text: Use of Rawreth Industrial Estate and parts of the field near there will add to an extremely difficult situation by placing unsustainable pressure on Rawreth Lane. As it stands the whole of Rawreth Lane is gridlocked from 5pm till 6.30pm and in the morning as well. I have lived here for 15 years and with each housing development the situation gets worse. Where are the amenities for these houses we currently have to oversubscribed primary schools with no room for expansion.

Summary: Use of Rawreth Industrial Estate and parts of the field near there will add to an extremely difficult situation by placing unsustainable pressure on Rawreth Lane. As it stands the whole of Rawreth Lane is gridlocked from 5pm till 6.30pm and in the morning as well. I have lived here for 15 years and with each housing development the situation gets worse. Where are the amenities for these houses we currently have to oversubscribed primary schools with no room for expansion.

Change to Plan Evidence that the local road infrastructure and amenities have been researched and what would be done to resolve the pressure placed on Rawreth Lane which is almost untenable as it stands with local residents.

Appear at exam? No

Soundness Tests i

Core Strategy Submission Document

O - 16046 - 9599 - The efficient use of land for housing, 4.14 - i, ii

16046 Object

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Respondent: Mrs Fiona Jury [9599]

WGDP Ltd
Cross Keys House
22 Queen Street
Salisbury
SP1 3EY

Agent: N/A

Full Text: The re-use of the four employment sites for housing or other alternative uses is counter-productive to the overall strategy for the District, and promotes unsustainable practice. If this approach is endorsed, it will require a further Green Belt release to accommodate the businesses displaced from these sites. It does not represent the most appropriate re-use of the land when the sites are well established employment locations with good occupancy rates.

Summary: The re-use of the four employment sites for housing or other alternative uses is counter-productive to the overall strategy for the District, and promotes unsustainable practice. If this approach is endorsed, it will require a further Green Belt release to accommodate the businesses displaced from these sites. It does not represent the most appropriate re-use of the land when the sites are well established employment locations with good occupancy rates.

Change to Plan The proposed re-use of the employment sites for housing or other alternative uses is unrealistic in the timescale proposed. The sites are also likely to require significant decontamination/remediation before they can be redeveloped for housing. It would be more sustainable to upgrade the existing employment sites, and bring forward alternative sites on the edge of higher order settlements for housing. The Core Strategy should be amended to reflect this.

Appear at exam? Yes

Soundness Tests i, ii

Core Strategy Submission Document

S - 16096 - 14107 - The efficient use of land for housing, 4.14 - None

16096 Support

CHAPTER 4 The efficient use of land for housing, 4.14

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: Whilst we support this proposal there are concerns in respect of Star Lane and Stambridge Mills that, in the long term, jobs may be lost to the Rochford community and also increased travel movements by car, due to inadequate public transport.

Summary: Whilst we support this proposal there are concerns in respect of Star Lane and Stambridge Mills that, in the long term, jobs may be lost to the Rochford community and also increased travel movements by car, due to inadequate public transport.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

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16248 Object

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Respondent: Colonnade Land LLP [9177]

Colonnade Land LLP
Fifth Floor
17-19 Maddox Street
London
W15 2QH
020 7255 7490

Agent: Icen Projects Limited (David Churchill) [10057]

Icen Projects Limited
83 Victoria Street
London
SJ1H 0HW

Full Text: ROCHFORD DISTRICT COUNCIL - LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY SUBMISSION
SEPTEMBER 2009

Icen Projects Ltd (Icen) has been instructed by Colonnade Land LLP (Colonnade) to submit representations to the Rochford Local Development Framework Core Strategy Submission (CSS).

a) Overview

It is our conclusion that the CSS is not justified, effective or consistent with national policy, as required by Planning Policy Statement 12: Creating Strong Safe and Prosperous Communities through Local Spatial Planning (PPS12) and is therefore vulnerable to being found unsound by an Inspector through the Examination in Public.

b) Background and Summary

These representations follow those made by Icen on behalf of Colonnade to the Preferred Options Core Strategy, submitted via letter dated 17 December 2008. In this regard, we would request that the Council confirms that the representations made to the Preferred Options Core Strategy will be taken into account alongside the current representations, particularly as there are a number of cross references between the two sets of representations.

It is not considered necessary to reiterate the content of the previous representations, as they were made at the appropriate stage and will be considered by the Planning Inspectorate in due course, but it is inevitable that certain elements will require restating where it is not clear that they have been taken into account in the production of the CSS. For clarity, therefore, Colonnade feel that it is appropriate to clarify the 'in-principle' issues that were raised in the representations to the Preferred Options Core Strategy, recognising that these issues were raised in the context of a wider and more coherent justification made within the representations:

- â€¢ Further cross-referencing of the recommendations made within the evidence base is required;
- â€¢ Greater focus should be placed on promoting Rochford as the principal settlement within the District;
- â€¢ Coombes Farm is the most logical location for residential development abutting the urban area of Rochford and as such warrants recognition as a general location for residential development;
- â€¢ The allocation of Three Ashes Farm for employment generating uses will be pursued;
- â€¢ Recognition that it is not realistic to expect residential allocations to be met mainly on Brownfield sites, nor should the intensification of smaller sites in residential areas be pursued;
- â€¢ Many of the sites identified as suitable for residential development will not be viable and will not come forward for development within the timescales anticipated;
- â€¢ The failure to provide the necessary justification for the proposed infrastructure improvements sought in Appendix H1;
- â€¢ The inclusion of an affordable housing exception policy was sought; and
- â€¢ The need to identify sites capable of delivering employment growth in the short term.

Following assessment of the CSS presented by the Council for consultation prior to submission to the Secretary of State, Colonnade considers the Plan to be 'unsound' as the document consistently fails to meet the tests of soundness set out in the table following Paragraph 4.52 of PPS12. For clarity, PPS12 confirms that to be 'sound' a Core Strategy should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY and defines 'justified' as "founded on a robust and credible evidence base" and "the most appropriate strategy when considered against the reasonable alternatives" and 'effective' as "deliverable", "flexible" and "able to be monitored".

The rationale for the above is identified in the remainder of these representations, which are provided in the interests of ensuring the Council delivers a strong, robust and logical Core Strategy that guides the future development of the District in a justified and effective manner.

b) Colonnade

As the Council is aware from previous submissions to the Local Development Framework, Colonnade is a strategic land company with a particular interest in the future development of the District as a consequence of a number of sites that it controls, particularly around Rochford.

The Council will also be aware that Colonnade has recently submitted an outline planning application for the residential development of the land at Coombes Farm, Rochford to provide a sustainable urban extension comprising up to 326

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residential dwellings, with associated accesses and community uses. Whilst the planning application process is clearly separate from the Local Development Framework production process, Colonnade wishes to continue the promotion of the site as a suitable location for residential development.

Accordingly, these representations focus on the legal requirements and tests of soundness associated principally with the Housing and Employment chapters of the CSS, with reference where appropriate to the sites that are controlled by Colonnade, the outline planning application at Coombes Farm and other issues where relevant.

c) Housing

i. Date of Adoption

The CSS assumes an adoption date of 2010 and plans for the provision of housing to 2025.

Taking account of the potential delays to the adoption of the Plan, including the Examination process, it would be more appropriate for the CSS to provide sufficient flexibility to allow for delays in its adoption. Colonnade considers an adoption date of 2011 for the CSS is a more realistic target.

Taking account of the advice in Paragraph 4.13 of PPS12, which states that the time horizon for the Core Strategy should be "at least 15 years from the date of adoption" it would be appropriate for the CSS to plan for the provision of housing to 2026 at the earliest. As such, Colonnade does not consider the CSS to be 'flexible' in the context of the tests of soundness in the table following Paragraph 4.52 of PPS12.

ii. Housing Delivery

However, setting the above aside, the Housing Chapter identifies the minimum housing delivery target for the period 2001 to 2021 of 4,600 dwellings as set out in the East of England Plan, with the annual average requirement of 250 dwellings per annum to extend provision from 2021 to 2025. It also confirms that the residual target for the period 2006 to 2021 is 3,790 dwellings, taking account of the delivery of 810 dwellings in the period 2001 to 2006, and a further 618 dwellings have been completed between 2006 and 2008.

This leaves a residual housing provision target of a minimum of 3,172 dwellings in the period 2008 to 2021. Taking into account the required provision beyond 2021, the residual housing provision target in the period 2008 to 2025 is a minimum of 4,172 dwellings. The disparity between these figures and those provided within the CSS are explained by the rounding down of the annual average delivery requirement in the period 2006 to 2021 to 250 dwellings per annum, compared with the actual figure of 252.67.

The table at Paragraph 4.6 of the CSS identifies the source of housing provision that will meet the identified minimum requirements and includes figures for 'Extant Planning Permissions' and 'Existing allocations/other appropriate sites identified in Strategic Housing Land Availability Assessment'. These figures, along with the actual completions within the period are combined to produce the figure for the 'Total without Green Belt release' figure.

Setting aside the concern regarding under-provision associated with the rounding down of the annual average delivery requirement in the period 2006 to 2021, the CSS fails to identify the sites that will contribute to the 'Extant Planning Permissions' provision. The identification of the sites that will contribute to the 'Extant Planning Permissions' should be provided in the context of the findings of the Inspector in the appeal by Asprey Homes [APP/G5180/A/07/2043219/NWF] who determined that the reliance on a delivery rate of 100% is unsafe [IR287].

Furthermore, at the time of writing these representations, the Strategic Housing Land Availability Assessment 2009 has not been published. It is impossible therefore for a full assessment of the proposed housing provision to be undertaken to confirm whether the CSS is 'founded on a robust and credible evidence base' [test of soundness in the table following Paragraph 4.52 of PPS12].

iii. Redevelopment of Employment Sites

Paragraph 4.14 of the CSS refers to the identification of the four employment sites that are considered by the Council to be suitable for redevelopment to residential use. However, the failure to publish the Strategic Housing Land Availability Assessment 2009 either before or alongside the publication of the CSS means that the assumptions made by the Council as to the suitability, availability, viability and deliverability of the sites cannot be assessed.

It has been necessary, therefore, to review the assumptions made in the Rochford Urban Capacity Study 2007 (UCS) regarding the sites. Within the section of the UCS entitled 'Redevelopment of Established Employment Land' [pages 22 & 23] includes a list of those sites assessed, their indicative capacities and the probability of residential development coming forward at the sites within the plan period (identified elsewhere as 2001 - 2021). The list includes the four sites identified in the CSS of Eldon Way/Foundry Estate, Hockley; Rawreth Lane Industrial Estate, Rayleigh; Stambridge Mills; and Star Lane Industrial Estate, Great Wakering.

In total, the UCS identifies an indicative residential redevelopment capacity of 486 units on the four sites (118, 220, 60 and 88 respectively). Of these, it identifies the Rawreth Lane Industrial Estate and Stambridge Mills as having a 'high'

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probability of coming forward for development in the Plan period (2001 - 2021), which would deliver 280 residential dwellings using the Council's own figures. The Star Lane Industrial Estate (referred to in the UCS as the Star Lane Brickworks) is identified as having a 'medium' probability of coming forward for development in the Plan period, with capacity to deliver 88 residential dwellings. It is unclear, therefore, where the figure for 'Existing allocations/other appropriate sites identified in Strategic Housing Land Availability Assessment'.

Set against this is the identification of these four sites in the CSS as being capable of delivery for residential development within the Plan period, with 671 units delivered between 2006 and 2015 and a further 506 units between 2015 and 2021.

The UCS also states in the same section that:

"There are considerable areas of land in the district that are currently allocated for, and in use as, employment land. The redevelopment of such sites for residential use would reduce demand for residential development on greenfield sites, but would at the same time create a need for alternative sites to be found for employment. Such an approach, which would be likely to require the decontamination of existing employment land to make it fit for residential use, together with development of a greenfield site and implementation of additional infrastructure to serve the new employment area, may well be unsustainable." [our emphasis]

The UCS appears to confirm therefore, that not only would the redevelopment of the four sites listed in the CSS be unlikely within the Plan period, but also potentially unsustainable. In this regard, it is notable that the promoters of Stambridge Mills sought the Screening Opinion of the Council as to whether Environmental Impact Assessment of the planning application for the redevelopment of the site for residential use was required in 2007, but to date are yet to submit a planning application for the redevelopment of the site.

In light of this, Colonnade does not consider the CSS is 'the most appropriate strategy when considered against the reasonable alternatives' [test of soundness in the table following Paragraph 4.52 of PPS12], which include the provision of residential development in East Rochford.

iv. Strategic Housing Growth to the East of Rochford

Furthermore, whilst paragraph 2.62 of the CSS identifies concern relating to the identification of locations to the east of Rochford for development on the basis that 'vehicular movements would inevitably be directed through Rochford's historic core', the CSS later identifies Stambridge Mills as a suitable site for residential redevelopment.

In light of the evident conflicts between the evidence base provided in support of the CSS and the absence of other evidence, the CSS is not considered 'sound' in the context of the tests of soundness in the table following Paragraph 4.52 of PPS12.

v. Housing Trajectory

Paragraph 4.28 of the CSS confirms that policies H1, H2 and H3 of the CSS will deliver housing supply as illustrated in the Housing Trajectory at Appendix H2. This Housing Trajectory is transposed from the 2008 Annual Monitoring Report (AMR).

Whilst on the face of it, the Housing Trajectory appears to confirm that the Council can meet its requirement to identify a five year housing supply, many of the sites identified within the AMR do not conform to the guidance issued by CLG in August 2008, on the assessment of a five year land supply. The guidance identifies sites that can be included within the five year assessment of housing supply as:

"those that are allocated for housing in the Development Plan, sites that have planning permission (outline or full planning permission that has not been implemented) and specific, unallocated brownfield sites that have the potential to make a significant contribution to housing delivery during the 5 year period".

Table 4.10: Projected Net Completions of the AMR confirms that the five year housing land supply figure includes sites from 'other land allocated for residential purposes', which are based on land allocations outside existing settlements. However, it should be clarified that these land allocations are not currently allocated for housing development in an adopted Development Plan. As such, these unallocated greenfield sites that are yet to make significant progress through the planning system should be discounted and the five year housing land supply recalculated.

The table below has been prepared to confirm the extent of the shortfall should the sites from 'other land allocated for residential purposes' be removed from the calculation of the Rochford five year housing land supply, in accordance with the guidance issued by CLG:

Recalculated Five Year Housing Land Supply (2009 - 2014):

Year
1st April 2009 to 31st March 2010
Predicted Delivery (A)

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106 dwellings
Allocations on 'other land allocated for residential purposes' (B)
0
Residual delivery (A-B)
106 dwellings
Delivery Shortfall
0

Year
1st April 2010 to 31st March 2011
Predicted Delivery (A)
217 dwellings
Allocations on 'other land allocated for residential purposes' (B)
150
Residual delivery (A-B)
67 dwellings
Delivery Shortfall
150

Year
1st April 2011 to 31st March 2012
Predicted Delivery (A)
544 dwellings
Allocations on 'other land allocated for residential purposes' (B)
300
Residual delivery (A-B)
244 dwellings
Delivery Shortfall
300

Year
1st April 2012 to 31st March 2013
Predicted Delivery (A)
395 dwellings
Allocations on 'other land allocated for residential purposes' (B)
375
Residual delivery (A-B)
20 dwellings
Delivery Shortfall
375

Year
1st April 2013 to 31st March 2014
Predicted Delivery (A)
300 dwellings
Allocations on 'other land allocated for residential purposes' (B)
300
Residual delivery (A-B)
0 dwellings
Delivery Shortfall
300

TOTAL

Predicted Delivery (A)
1,562 dwellings

Allocations on 'other land allocated for residential purposes' (B)
1,125 dwellings

Residual delivery (A-B)
437 dwellings

Delivery Shortfall
1,125 dwellings

The above table confirms that the removal of the 'other land allocated for residential purposes' from the calculation of the Rochford five year housing land supply leaves the Council with a minimum net additional housing delivery of 437 dwellings, which equates to a supply of 1.7 years based on the adjusted annual delivery target of a minimum of 255 net

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additional dwellings per annum. As such, the Council is failing to meet its requirement to demonstrate a five year housing land supply in accordance with PPS3 and the supporting guidance provided by CLG. It is notable that the recent application by David Wilson Homes at Land between Main Road and Rectory Road and Clements Hall Way, Hawkwell identifies an even greater shortfall in the Council's five year housing land supply.

In addition to the above, the AMR does not include a commentary on how deliverability has been assessed against the requirements of paragraph 54 of PPS3.

Furthermore, the guidance from CLG confirms that the windfall sites cannot be relied upon in demonstrating a five year supply unless a Local Planning Authority can demonstrate genuine local circumstances exist to allow this exception. However, the second paragraph of the section entitled 'Housing Trajectory and Five Year Housing Supply' confirms that the estimated completions in the years 2008 to 2013 includes estimated yields through 'intensification' coming forward in future years. With reference to the definition of 'intensification' on page 13 of the AMR, it appears that the 'Housing Trajectory and Five Year Housing Supply' also includes provision for windfall sites. As such, the Council is required to demonstrate the 'genuine local circumstances exist to allow this exception'.

The pressures on delivery and need for additional sites are more acute when it is considered that an average delivery rate of 204 dwellings per annum was achieved during a strong period of housing market growth. In view of the current economic downturn, and significant problems faced within the housing market, the Council should seek to identify appropriate and deliverable sites to meet its regional housing target provision commitments. Suitable sites would include Coombes Farm, which has been positively promoted for development through the LDF process.

It may, therefore, be more appropriate for the Council not merely to allocate sufficient sites to meet the minimum targets set down by the East of England Plan, but to identify a reservoir of land capable of coming forward for development should the sites identified through the CSS and Allocations Development Plan Documents (DPD) fail to come forward for development within the anticipated timescales.

vi. Appendix H1

As set out in the representations to the Preferred Options Core Strategy, there is continuing concern that the list of improvements to infrastructure required in support of residential development as set out in Appendix H1 fails to provide the necessary justification for its inclusion. Whilst the preamble seeks to clarify why the infrastructure is sought, the inclusion of this list should be fully justified, otherwise it is of little value. Furthermore, it would be of benefit to provide further details of the existing community infrastructure provision and capacity within the evidence base.

The failure to provide the necessary justification for its inclusion means that the CSS will not be 'founded on a robust and credible evidence base' [test of soundness in the table following Paragraph 4.52 of PPS12].

d) Character of Place

As set out in the representations to the Preferred Options Core Strategy, Colonnade considers that, with respect to the requirement to produce and adhere to Development Briefs for large residential developments, as set out in Policy CP1, the Council should not seek to impose further demands on developers where existing regulations provide sufficient requirements regarding design. In this instance, Design and Access Statements provide sufficient design guidelines for developments and there is no additional information provided in the policy or supporting text that clearly sets out the justification for this requirement.

e) Green Belt

With reference to the comments regarding the redevelopment of employment sites under the 'Housing' section above and the requirement to allocate sufficient land to meet the minimum housing provision targets as required by the East of England Plan, Colonnade considers that the chapter on Green Belt, and policy GB1 in particular, fails to provide the necessary evidence base that will allow it to be monitored effectively.

It is inherent that the proposed redevelopment of previously developed employment sites for residential use in order to reduce the requirement to allocate previously undeveloped land for residential use will displace these employment uses. In turn, therefore, the separate allocation of previously undeveloped Green Belt to accommodate the compensatory employment provision is required. This is accepted in principle at paragraph 11.11 of the CSS.

Without providing clarification of the anticipated quantum of land required to accommodate the provision of housing and compensatory and new employment land, it is not possible to monitor the performance of policy GB1.

However, using the Council's figures in the table setting out the breakdown of the housing provision figures in Chapter 4 of the CSS (assuming that actual completions and extant permissions are all on previously developed land), setting aside the displacement of employment uses referred to above, approximately 42% of the required minimum housing provision target is capable of being accommodated on previously developed land (2,005 units from a total of 4,750). As such, the Council is required to provide at least 58% of the required minimum housing provision target on the Green Belt (2,745 units from a total of 4,750).

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If these figures are adjusted to take account of the displacement of employment uses (assuming the provision of an equal quantity of land is required to compensate for the employment land that is redeveloped), this figure changes to 17.5% on previously developed land and 82.5% on Green Belt (828 and 3,922 units from a total of 4,750 respectively). Even allowing for the achievement of higher densities of employment on new developments, the figures above are unlikely to change significantly.

Furthermore, the table in Chapter 4 also confirms that no previously developed land will be available for development beyond 2021, or 2015 if account is taken of the displacement of the employment uses.

In light of this, not only does Chapter 6 fail to provide the necessary evidence base that will allow it to be monitored effectively, it is also necessary to consider whether it presents the most appropriate strategy for addressing the required release of Green Belt land to accommodate the defined housing and employment delivery targets to 2025 and beyond as necessary. Colonnade considers a more robust approach that is flexible and capable of being monitored, would be to clearly identify those sites capable of delivery in the short term, which for the avoidance of doubt includes those sites being promoted by Colonnade, with a reservoir of alternative sites set aside for future growth.

As set out in the representations to the Preferred Options Core Strategy, Colonnade considers that the inclusion of an affordable housing exception policy within the CSS will aid the delivery of community housing within rural areas. However, the CSS does not contain such a policy, or adequately address the issue of community housing within rural areas and the CSS is not considered to provide sufficient flexibility to allow for the delivery of essential rural housing.

f) Environmental Issues

Colonnade has concerns regarding the justification for and effectiveness of a number of the policies contained within the Environmental Issues chapter, as follows:

â€¢ Policy ENV1: The Council fails to identify how it will "maintain, restore and enhance" the sites of nature conservation importance that are identified, or how the performance of this policy will be monitored;

â€¢ Policy ENV3: In the context of the advice at paragraph 4.32 of PPS12 regarding the reformulation of national policies, Colonnade does not consider that this policy is required; and

â€¢ Policy ENV9: As set out in the representations to the Preferred Options Core Strategy, Colonnade does not consider that the necessary evidence base has been provided to justify a policy that seeks to go above and beyond the policy targets for the Code for Sustainable Homes as set out by Central Government.

g) Community Infrastructure, Leisure and Tourism

Policy CLT1 refers to the requirement for residential and employment development to contribute to the infrastructure identified in Appendix CLT1 through Standard Charges.

However, whilst the general principle of securing planning obligations through the application of standard charges is broadly accepted, the list of infrastructure requirements set out in Appendix CLT1 is not supported by sufficient evidence base to identify its robustness and credibility. As such, Colonnade does not consider either policy CLT1 or Appendix CLT1 is justified in the context of PPS12.

It is also noted that, despite the clarification sought by Colonnade at the Core Strategy Preferred Options stage, the CSS fails to confirm what information should be contained within Health Impact Assessments, which are required by policy CLT4. Once again, Colonnade requests further clarification of what is involved in the assessment and the expected outputs, which will provide greater clarity and will allow the policy to be monitored.

h) Transport

Policy T8 confirms that the Council will apply minimum parking standards. As set out in the representations to the Preferred Options Core Strategy, the guidance in Planning Policy Guidance Note 13: Transport (PPG13) is clear regarding the imposition of parking standards.

Paragraphs 52-56 of PPG13 confirm that the Local Planning Authorities should apply maximum not minimum parking standards. In order to satisfy the legal requirements set out in PPS12, the policy must reflect PPG13 to promote sustainable transport choices and further provide incentives for developers to locate further residential land closer to local service centres by requiring maximum parking standards for residential developments.

i) Economic Development

As set out in the representations to the Preferred Options Core Strategy, the land at Three Ashes Farm provides an excellent opportunity to deliver employment growth in the short term and may be a suitable site for the 'Eco-Innovation Centre' that is being promoted by the Council. Its identification as a suitable location for strategic employment growth, or the provision of an Eco-Innovation Centre, would accord with the general principles of the policies contained within Chapter 11.

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The identification of Purdeys Industrial Estate as fit for purpose (in paragraph 11.32 and the Council's 2008 Employment Land Study 2008) and therefore it should be maintained and if possible expanded, is welcomed and Colonnade considers that Three Ashes Farm could deliver this expansion, providing a natural extension to Purdeys Industrial Estate and being strategically located close to the Airport.

Three Ashes would address the negative impacts that the nearby residential area experiences from the existing Industrial Estate by providing a buffer between established uses and the residential area with less intensive employment activities. The highways analysis that has been carried out has suggested that it would not have an adverse impact on roads and congestion. Furthermore, there are very few opportunities for businesses to expand and Three Ashes could provide this opportunity.

j) Conclusions

Following the submission of representations to the Preferred Options Core Strategy, Colonnade is disappointed to note that the CSS fails to take account of the majority of the issues raised in their representations.

In addition, Colonnade considers the plan to be 'unsound' as the document consistently fails to meet the tests of soundness set out in the table following Paragraph 4.52 of PPS12 and respectfully requests that the Council notifies Icen, on behalf of Colonnade, of the future arrangements for the Examination of the Core Strategy. Furthermore, Colonnade wishes to take this opportunity to formally register a request to appear at all stages of the Examination in Public, including the pre-hearing meeting and any planned hearing sessions whereby issues raised in the context of this letter are to be discussed. Please confirm this request, and that the representations made to the Preferred Options Core Strategy will be taken into account alongside the current representations, by way of return to this letter.

Icen Projects, on behalf of Colonnade Land LLP trusts that the Council will find these representations to be constructive and helpful in taking forward the Core Strategy. Should you wish to discuss any aspect of these representations further, please do not hesitate to contact us.

Summary:

iii. Redevelopment of Employment Sites

Paragraph 4.14 of the CSS refers to the identification of the four employment sites that are considered by the Council to be suitable for redevelopment to residential use. However, the failure to publish the Strategic Housing Land Availability Assessment 2009 either before or alongside the publication of the CSS means that the assumptions made by the Council as to the suitability, availability, viability and deliverability of the sites cannot be assessed.

It has been necessary, therefore, to review the assumptions made in the Rochford Urban Capacity Study 2007 (UCS) regarding the sites. Within the section of the UCS entitled 'Redevelopment of Established Employment Land' [pages 22 & 23] includes a list of those sites assessed, their indicative capacities and the probability of residential development coming forward at the sites within the plan period (identified elsewhere as 2001 - 2021). The list includes the four sites identified in the CSS of Eldon Way/Foundry Estate, Hockley; Rawreth Lane Industrial Estate, Rayleigh; Stambridge Mills; and Star Lane Industrial Estate, Great Wakering.

In total, the UCS identifies an indicative residential redevelopment capacity of 486 units on the four sites (118, 220, 60 and 88 respectively). Of these, it identifies the Rawreth Lane Industrial Estate and Stambridge Mills as having a 'high' probability of coming forward for development in the Plan period (2001 - 2021), which would deliver 280 residential dwellings using the Council's own figures. The Star Lane Industrial Estate (referred to in the UCS as the Star Lane Brickworks) is identified as having a 'medium' probability of coming forward for development in the Plan period, with capacity to deliver 88 residential dwellings. It is unclear, therefore, where the figure for 'Existing allocations/other appropriate sites identified in Strategic Housing Land Availability Assessment'.

Set against this is the identification of these four sites in the CSS as being capable of delivery for residential development within the Plan period, with 671 units delivered between 2006 and 2015 and a further 506 units between 2015 and 2021.

The UCS also states in the same section that:

"There are considerable areas of land in the district that are currently allocated for, and in use as, employment land. The redevelopment of such sites for residential use would reduce demand for residential development on greenfield sites, but would at the same time create a need for alternative sites to be found for employment. Such an approach, which would be likely to require the decontamination of existing employment land to make it fit for residential use, together with development of a greenfield site and implementation of additional infrastructure to serve the new employment area, may well be unsustainable." [our emphasis]

The UCS appears to confirm therefore, that not only would the redevelopment of the four sites listed in the CSS be unlikely within the Plan period, but also potentially unsustainable. In this regard, it is notable that the promoters of Stambridge Mills sought the Screening Opinion of the Council as to whether Environmental Impact Assessment of the planning application for the redevelopment of the site for residential use was required in 2007, but to date are yet to submit a planning application for the redevelopment of the site.

In light of this, Colonnade does not consider the CSS is 'the most appropriate strategy when considered against the

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reasonable alternatives' [test of soundness in the table following Paragraph 4.52 of PPS12], which include the provision of residential development in East Rochford.

Change to Plan

Appear at exam? Yes Soundness Tests i, iii

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O - 16711 - 7834 - The efficient use of land for housing, 4.14 - i

16711 Object

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Respondent: Ms G Yeadell [7834]

6 Southend Road
Hockley
Essex
SS5 4QQ
01702 205450

Agent: N/A

Full Text: Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1

Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2 you discarded N.E.Hockley as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley..along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

Response to C.S Preferred Options 2008 and HAAP 2009

June 2009 issue C S Submission issue says Eldon Way will be used for housing, whereas Sept.2009 issue says "alternative uses, including residential.." to be decided by HAAP (Issues consultation done, Pref.Options issue awaited, but judging from JAAP Pref.Options decision - namely biggest option chosen against overriding opposition, it will be housing).

Need to be logical and even-handed in proposals

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

Establish likely level of Standard Charges. Accept you cannot turn district into motorways with wholesale demolition.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

Para.10.5 "..highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which cannot be altered without much destruction.

Reply to CS Pref. Options 2008 & HAAP Issues/Options 2009

Policy T3, CLT1 Appendix CLT1 Public transport RDC admits this is in the private sector. In Hockley, operator has cut No7 service to 1 per hour from Ashingdon Schools, claiming it is unviable beyond. This is unlikely to change as Hockley is car dependant. No8 bus through Hawkwell is cut to 1 per hour to Rayleigh, for same reason as No7. Proposed planning agreements with developers can't run: eg, a community centre or classroom given by a developer remains once he has moved on - how can that apply for an on-going bus service?

Reply to Infrastructure Transport in CS Pref. Opts. 2008 and to HAAP Issues Opts. 2009.

Ch.11 Economic development

Policy ED3 Core Strategy preferred Options 2008 hinted at possible housing in Eldon Way site. June 2009 Submission version, without consultation, said Eldon Way would be housing (map included Foundry, not the text). September 2009 Submission said redevelopment would be in HAAP (which apart from the Issues/Options version, is unfinished. Judging from results of JAAP Preferred Options where biggest option is chosen, though most respondents were against it, site will be housing, without consultation.

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Para.1.25, Para.11.32 Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to accommodated employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

Reply to HAAP Issues Options 2009

Remove compulsory relocation

Policy ED4 Policy states Council will allocate 18ha of land to make up for de-allocations in ED3 - that proves point above.

Proposals for moving employment to out of town locations with no existing transport links are contrary to government policies PPG4, PPS1 and PPS4 and Core Strategy Policy T1.

Evidence Base is ignored by contravening Hockley Parish Plan 2007 and ignoring residents' views on HAAP Issues/Options. Next stage of HAAP Preferred Options is pre-empted and rendered irrelevant. Core Strategy plans to relocate Eldon Way Foundry estate to Greenfield site with no nearby bus or railway. RDC plans to upgrade the nearest road to dual carriageway, though the connecting B1013 (through Hockley) will stay single, said by ECC Highways statistics to be 72% capacity. Airport bosses and council cannot suggest there will be no traffic growth from JAAP and new industrial site.

Reply to Hockley Parish Plan 2007. HAAP Issues 2009

Move to new industrial site near airport contravenes PPS4:

- EC7.3C "out of centre sites, with preference given to sites...well served by choice of...transport and...close to centre and...high likelihood of forming links with centre". There is no current public transport and links with centres is unlikely".

- EC 7.5.1 "whether the site is or will be accessible and well served by choice of transport, public transport, walking and cycling, as well as by car...". Remote location, narrow busy B1013 makes the site unsuitable for access by cycle or on foot.

It also contravenes PPS1 (27vii)... "reduce need to travel, encourage accessible public transport provision to secure more sustainable patterns of transport...Planning should actively manage patterns of urban growth to make fullest use of public transport and focus development in existing centres, near to major public transport interchanges". Core Strategy undermines its own policy Transport and Highways policy T1 and is unsound.

Although shown on accompanying drawing in earlier versions, there was no prior textual mention of Foundry industrial estate (next to Eldon Way) for redevelopment until current CS 2009 Submission. This was stated to be a typing error, but does not inspire confidence in reliability of drafting.

Revise both 2009 Core Strategy and 2009 HAAP Issues/options

Chapter 12: Retail/Town centres

The Core Strategy misrepresents findings of the Retail and Leisure Study 2008.

Para.12.38 The Core Strategy states (para.12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace."

Whereas the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure".

2) (10.28) "There is no immediate capacity for additional floorspace".

3) (10.29) "we recommend focus be maintained on developing Hockley's existing strengths, rather than retail expansion"

4) 10.31 "the current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it has a very small catchment population. Accordingly, the council may wish to consider reclassifying Hockley from a town centre to a district centre".

Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

The Council will work with landowners and its partners to deliver the HAAP.

Remove threat of compulsory purchase orders.

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O - 16711 - 7834 - The efficient use of land for housing, 4.14 - i

16711 Object

CHAPTER 4 The efficient use of land for housing, 4.14

One doesn't perceive impartiality when the Planning Director replies to local HAAP survey with "The affluent people of Hockley are entitled to famous name shops".

Chapter 5: Character of Place and Local Lists

Para.5.4 "Rochford district has unique character..stems from traditional buildings..still dominate towns and villages".

Para.5.17 "Council believes many buildings..are of local distinctiveness..part of..cherished local scene".

This only applies to favoured places: Rochford, Rayleigh, greenbelt villages. Many Hockley conservable items have been systemically removed for supposedly lucrative development in face of widespread protect. This is for supposed need for housing. In fact heritage items have been replaced by dwellings most cannot afford, and/or are hard to sell due to unsuitability of massing and siting. Many other homes are jeopardised by this practice.

HAAP issues 2009. Core Strategy 2006, 2007,2008, SCI.2006

Fewer 'vested interests', more even handedness. No more pressing people out of businesses, homes for expediency.

A CPRE Fieldwork issue extolled Local Lists, citing refusal of 16 flats to replace character house, not on local list. Inspector said house, facade made a contribution to area character, even if English heritage decided it didn't warrant listing. Council worked to get the house grade listed and even made adjacent area conservation one.

Hockley had one such on a "significant site" faced with 13 flats. Ward Member omitted house from refusal proposal, so house could be demolished. RDC dropped Local List ahead of appeal: "Government frowned on such Lists" (Other LAs, unaware of supposed directive retained theirs. After demolition RDC restored Local Lists, saying Government now support them. When Inspector queried the complaint, the then policy officer said "just politics, lot of local interest, nothing of character in the area[!]. (A dozen such items had been removed). Some "distinctive" Hockley buildings are still condemned (in Greensward Lane., others threatened (Spa Road). Whereas a modest hue and cry in Rayleigh will usually result in a building being saved.

Conclusion

Core Strategy Submission DPD is basically unsound in many respects

Incomplete information. Amongst others, it refers to Hockley AAP, the first stage of which is complete, but not other three. Rochford AAP first stage has been published in arrears of Core Strategy Submission. Rayleigh AAP is still awaited. Precise housing sites are absent, as Urban Capacity Study 2007 has been superseded by Strategic Housing Land Availability Assessment, not yet published. Traders, residents, are thus responding to Core Strategy Submission with incomplete information.

Lack of community involvement. Chapter 1, Introduction, para. 1.11 "Community involvement is an essential part of the plan making process".

In Statement of Community Involvement 2006 Rochford RDC "recognises need to enable people to have their voices heard".

Re Public Meetings: "Consideration will be had to timing and venue to ensure meeting is as accessible as possible".

Take Hockley Area Action Plan as an example of the opposite of all this:- Presentation of document was at Hullbridge, 7.30pm. It was also discussed with JAAP at Rochford Freight House (for traders only) at 7am, without publicity. Excuse made: HAAP on RDC website, which none will seek unless knowing it is there. Rochford District Matters newssheet had minute articles on p.3, half way through consultation period. Another excuse: a 2nd presentation by Hockley Residents Association with planning officer present: only because of complaints, and it is not the HRA's responsibility to RDC's job. Due to unavoidable haste of calling meeting, few knew and only 50 were present.

In Core Strategy Submission Hockley Parish Plan has been ignored. Proposals also ignore 95% rejection rate response to HAAP 2009, which included proposals for Eldon Way employment site.

Unfettered right of developers to carry on as if Core Strategy didn't exist. In PPS 12, Ch.4.6 states: "Core Strategies should be flexible and able to show how they handle contingencies". Several large planning applications have been submitted proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS 12.

Where are we? Finally, at Chapter 1, Introduction, para. 1.24: "the Core Strategy will have to be reviewed in the event of a new Local Area Agreement, post-2011, setting different priorities". So what purpose does all this work serve? So we have hardly finished this exercise, before it all starts again?

Summary:

Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

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Policy H1

Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2 you discarded N.E.Hockley as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley..along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

June 2009 issue C S Submission issue says Eldon Way will be used for housing, whereas Sept.2009 issue says "alternative uses, including residential.." to be decided by HAAP (Issues consultation done, Pref.Options issue awaited, but judging from JAAP Pref.Options decision - namely biggest option chosen against overriding opposition, it will be housing).

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Change to Plan Need to be logical and even-handed in proposals

Appear at exam? Not Specified **Soundness Tests** i

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O - 16743 - 14229 - The efficient use of land for housing, 4.14 - i, iii

16743 Object

CHAPTER 4 The efficient use of land for housing, 4.14

Respondent: Hockley Under Threat (J Abbey) [14229]

Hockley Under Threat
None provided

Agent: N/A

Full Text:

Ch. 4 Housing; Ch.10 Transport, Highways; Ch.11 Economic Development; Ch.12 Retail/town centres; Ch.5 Character of place & Local Lists

Chapter 4: Housing

Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1, Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2

N.E.Hockley was discarded as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley...along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

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Policy H1, T1 Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG14 & PPS1. it also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths",

The Core Strategy also contravenes its own policy T1 and is unsound.

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

Establish like motorways with wholesale demolition.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts.

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Para.10.5

Policy T3, CLT1 Appendix CLT1

T1 & T2 "...highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which

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cannot be altered without much destruction.

Public transport RDC admits this is in the private sector. In Hockley, operator has cut No 7 service to one per hour from Ashingdon Schools, claiming it is unviable beyond. This is unlikely to change as Hockley is car dependant. No 8 bus through Hawkwell is cut to one per hour to Rayleigh, for same reason as No 7. Proposed planning agreements with developers can't run: e.g., a community centre or classroom given by a developer remains once he has moved on - how can that apply for an on-going bus service?

Ch.11 Economic development

Policy ED3 Core Strategy preferred Options 2008 hinted at possible housing in Eldon Way site. June 2009 Submission version, without consultation, said Eldon Way would be housing (map included Foundry, not the text). September 2009 Submission said redevelopment would be in HAAP (which apart from the Issues/Options version, is unfinished. Judging from results of JAAP Preferred Options where biggest option is chosen, though most respondents were against it, site will be housing, without consultation.

Para.1.25 Para.11.32

Policy ED4 T1 & T2 Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to accommodated employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

Remove compulsory relocation

Policy states Council will allocate 18ha of land to make up for de-allocations in ED3 - that proves point above.

Proposals for moving employment to out of town locations with no existing transport links are contrary to government policies PPG4, PPS1 and PPS4 and Core Strategy Policy T1.

Evidence Base is ignored by contravening Hockley Parish Plan 2007 and ignoring residents' views on HAAP Issues/Options. Next stage of HAAP Preferred Options is pre-empted and rendered irrelevant.

Core Strategy plans to relocate Eldon Way Foundry estate to Greenfield site with no nearby bus or railway. RDC plans to upgrade the nearest road to dual carriageway, though the connecting B1013 (through Hockley) will stay single, said by ECC Highways statistics to be 72% capacity. Airport bosses and council cannot suggest there will be no traffic growth from JAAP and new industrial site.

Revise both 2009 Core Strategy and 2009 HAAP Issues/options

Move to new industrial site near airport contravenes PPS4:

EC7.3C "out of centre sites, with preference given to sites..well served by choice of..transport and..close to centre and..high likelihood of forming links with centre". There is no current public transport and links with centres is unlikely".

EC 7.5.1 "whether the site is or will be accessible and well served by choice of transport, public transport, walking and cycling, as well as by car..". Remote location, narrow busy B1013 makes the site unsuitable for access by cycle or on foot.

It also contravenes PPS1 (27vii).. "reduce need to travel, encourage accessible public transport provision to secure more sustainable patterns of transport..Planning should actively manage patterns of urban growth to make fullest use of public transport and focus development in existing centres, near to major public transport interchanges". Core Strategy undermines its own policy Transport and Highways policy T1 and is unsound.

H1 & RTC6 Although shown on accompanying drawing in earlier versions, there was no prior textual mention of Foundry industrial estate (next to Eldon Way) for redevelopment until current CS 2009 Submission. In recent amendment to the CS this was stated to be due to a typing error!

Chapter 12: Retail/Town centres

The Core Strategy misrepresents findings of the Retail and Leisure Study 2008.

Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

Para.12.38 H1 & RTC6 The Core Strategy states (para.12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace."

Whereas the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food

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shopping expenditure".

2) (10.28) "There is no immediate capacity for additional floorspace".

3) (10.29) "we recommend focus be maintained on developing Hockley's existing strengths, rather than retail expansion"

4) 10.31 "the current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it has a very small catchment population. Accordingly, the council may wish to consider reclassifying Hockley from a town centre to a district centre".

Remove threat of compulsory purchase orders.

The Council will work with landowners and its partners to deliver the HAAP.

Chapter 5: Character of Place and Local Lists

Para.5.4 "Rochford district has unique character..stems from traditional buildings..still dominate towns and villages".

Para.5.17 "Council believes many buildings..are of local distinctiveness..part of..cherished local scene".

This only appears to apply to certain places: Rochford, Rayleigh, greenbelt villages. Many Hockley conservable items have been systemically removed for supposedly lucrative development in face of widespread protect. This is for supposed need for housing. In fact heritage items have been replaced by dwellings most cannot afford, and/or are hard to sell due to unsuitability of massing and siting. Many other homes are jeopardised by this practice.

Conclusion

Core Strategy Submission DPD is basically unsound in many respects:

Incomplete information. Amongst others, it refers to Hockley AAP, the first stage of which is complete, but not other three. Rochford AAP first stage has been published in arrears of Core Strategy Submission. Rayleigh AAP is still awaited. Precise housing sites are absent, as Urban Capacity Study 2007 has been superseded by Strategic Housing Land Availability Assessment, not yet published. Traders, residents, are thus responding to Core Strategy Submission with incomplete information.

Lack of community involvement. Chapter 1, Introduction, para. 1.11 "Community involvement is an essential part of the plan making process". In Statement of Community Involvement 2006 Rochford RDC "recognises need to enable people..to have their voices heard".

Re Public Meetings: "Consideration will be had to timing and venue to ensure meeting is as accessible as possible".

Hockley Area Action Plan as an example of the opposite of all this:- Presentation of document was at Hullbridge, 7.30 p.m. It was also discussed with JAAP at Rochford Freight House (for traders only) at 7 a.m., without publicity. Excuse made: HAAP on RDC website, which none will seek unless knowing it is there. Rochford District Matters newssheet had minute articles on p.3, half way through consultation period. Another excuse: a second presentation by Hockley Residents Association with planning officer present: only because of complaints, and it is not the HRA's responsibility to RDC's job. Due to unavoidable haste of calling meeting, few knew and only 50 were present.

In Core Strategy Submission Hockley Parish Plan has been ignored. Proposals also ignore 95% rejection rate response to HAAP 2009, which included proposals for Eldon Way employment site.

Unfettered right of developers to carry on as if Core Strategy didn't exist. In PPS 12, Ch.4.6 states: "Core Strategies should be flexible and able to show how they handle contingencies". Several large planning applications have been submitted proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS 12.

Where are we? Finally, at Chapter 1, Introduction, para. 1.24: "the Core Strategy will have to be reviewed in the event of a new Local Area Agreement, post-2011, setting different priorities". So what purpose does all this work serve? So we have hardly finished this exercise, before it all starts again?

Summary:

Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1 Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2

N.E.Hockley was discarded as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley...along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

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O - 16743 - 14229 - The efficient use of land for housing, 4.14 - i, iii

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June 2009 issue C S Submission issue says Eldon Way will be used for housing, whereas Sept.2009 issue says "alternative uses, including residential.." to be decided by HAAP (Issues consultation done, Pref.Options issue awaited, but judging from JAAP Pref.Options decision - namely biggest option chosen against overriding opposition, it will be housing).

Policy H1, T1 Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG14 & PPS1. it also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths",

The Core Strategy also contravenes its own policy T1 and is unsound.

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Change to Plan Need to be logical and even-handed in proposals

Appear at exam? Not Specified **Soundness Tests** i, iii

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O - 16916 - 10009 - The efficient use of land for housing, 4.14 - i, ii

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Full Text: Local Development Framework

Representations on the Core Strategy
Submission Document, November 2009
On behalf of Barratts Eastern Counties

Introduction

The requirements of Core Strategies are enshrined in the 2004 Planning and Compensation Act, the Town & Country Planning (Local Development) England (Regulations) 2004 and the 2008 policy guidance in PPS12. The requirements of Coe Strategies are clear. And they are legal requirements. The Core Strategy must comply with the Local Development Scheme, Statement of Community Involvement and the Regulations. The Core Strategy must be subject to a sustainability appraisal, have regard to national guidance, conform generally with the Regional Spatial Strategy and have regard to any Sustainable Community Strategy. A Core strategy must be sound - justified, effective and consistent with national policy. The following representations therefore focus on these legal requirements.

HOUSING

Paragraph 4.6 - Evidence Base

To meet the soundness test Submission Core Strategies (SCS) must be justified, that is to say it must be founded on robust and credible evidence base and comprise the most appropriate strategy when considered against reasonable alternatives. The housing strategy in as far as it identifies a need for Green belt sites is sound, however, there are other elements which are unsound.

Paragraph 4.6 notes that the Strategic Housing Land Availability Assessment (SHLAA) has examined the supply of housing. It is presumed that the Table at paragraph 4.6 is the outcome of this examination. Whilst the SHLAA has some legitimacy in that it identifies various sites that are apparently available, we are concerned that because the SHLAA was only published in November 2009 it post dates the SCS. This implies that the SCS is driving the SHLAA exercise rather than the other way round. Whilst this may have no real practical effect on the outcome of the SCS and the identified need for Green Belt sites, the Inspector will be mindful of the advice in paragraphs 33 and 54 of PPS3 that SCS draw on the evidence in SHLAA. It may be that the SCS should explain how the evidence base has been used to justify the strategy.

PPS12 explains at paragraph 4.37 that Core Strategies are based on thorough evidence. Since the SHLAA has only recently been published it is considered that the SCS is unsound as it is not justifiable. This, together with other comments on the SCS, indicates that the process should be delayed to ensure that a more robust document is placed in front of the EiP Inspector.

Table at Paragraph 4.6 - Evidence base

From our review of the available evidence it would appear that the housing land supply is insufficient and that Green Belt release are required. From the wider strategy being promoted we note that some of the sites that the District Council consider to be 'appropriate' are likely to relate to existing employment areas. As set out elsewhere in our representations, we maintain severe reservations that the redevelopment of existing employment sites for alternative uses and particularly the Eldon Way Industrial Estate is unsustainable. We will make reference to the effectiveness of this strategy in relation to sustainability, whether it is justified in the context of National Policy and the deliverability of such a strategy elsewhere.

In particular, paragraph 11.32 of the SCS refers to existing employment land and sites within the UCS. It does not refer the SHLAA and as such it appears that an evidence base to support the re-use of employment land for residential is not reported in the SCS.

Having reviewed the 2008 Annual Monitoring Report, as we did when commenting on the 2008 Preferred Options Core Strategy, we maintain severe doubts as to the appropriateness of some of the previously developed sites identified as potential housing sites and their expected housing yield. Whilst we cannot at this stage ascertain whether the SHLAA

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sites referred to in this table correlate with the Annual Monitoring Report and indeed the 2007 Urban Capacity Study, it is our view that there will be some commonality and so the reliance on these sites is likely to be at odds with Government Policy. We shall elaborate on this objection in relation to the specific housing policy below.

We note that the last two rows in the Table at paragraph 4.6 set out figures with and without Green Belt releases. The text to this section of the Core Strategy should, for reasons of clarity, explain that Green belt review will be necessary in order to deliver the required housing.

Paragraph 4.9

The table on page 40, which sets out the settlement tiers, is supported. Rayleigh, Rochford/Ashingdon, Hockley/Hawkwell are clearly the largest settlements in the District and they benefit from good employment, housing, leisure, community and public transport provision. These settlements are the most sustainable ones with the greatest mix of uses. Consequently, it is sensible that the Core Strategy identifies these as top tier settlements and is able to target them with growth accordingly. This component of the strategy is justified by reference to sustainability data and is effective, since targeting development at these locations will ensure a more sustainable pattern of development.

Paragraph 4.14

We maintain that the strategy for redeveloping the Eldon Way Industrial Estate for housing and other alternative uses to employment is unsound. It is neither justified nor effective. The Industrial Land Availability Study 2006 sets out on page 7 strategic objectives. The 3rd objective seeks to Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive. Clearly the strategy as currently drafted envisages major changes to existing industrial estates, including alternative uses. This strategy is not consistent with other strategies and evidence based studies and so cannot be justified in the context of the tests set out in PPS12. It is also an ineffective strategy since the new employment locations that would free up the Eldon Way site for redevelopment relies on transport infrastructure that has no certainty of being delivered. Principally, the erosion of employment uses at Eldon Way could make the settlement of Hockley/Hawkwell less sustainable and thus conflict with the tiered approach on page 40, paragraph 4.9.

Policy H1

Prioritising the use of previously developed land ("pdl") is supported in principle. It is a justified strategy in the context of PPS3 and effective as sequential choices can be made by implementing the policy. However, the District Council is also promoting a strategy which seeks the redevelopment of existing employment locations to alternative uses and by consequence is identifying green field sites for new employment development elsewhere (Policy ED4 refers). This 'land swapping' is not considered consistent with PPS3, nor is it considered to be justified or effective in delivering the desired strategy. This is particularly the case as most of the existing employment sites are occupied and therefore unavailable for redevelopment. In addition, the new Greenfield sites are in an arguably less sustainable locations away from the top tier settlements identified on page 40 of the Submission Core Strategy. Clearly this element of the strategy is inconsistent with the wider strategy.

The Industrial Land Availability Study 2006 is included as an evidence base by the District Council. It includes an introductory section, which explains that the authority wishes to make Rochford the place of choice for new business. It includes several strategic objectives on page 7 including "Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive." It reviews existing employment areas and identifies vacant land, including land available from allocations. It does not include any assessment of new sites or potential opportunities for new sites that might have been expected to feed into the Core Strategy. The strategy for identifying Green Belt site employment allocation does not appear to be based on any evidence in this document and in that context cannot be justified. The strategy being promoted potentially conflicts with Government policy in PPG13, PPG2 and emerging PPS4.

The Employment Land Study 2008 is a much later document. It has a key recommendation on page ii "we recommend that Rochford District Council adopts strong policies to protect existing employment land." Furthermore under recommendations for existing sites on page iii-iv of that document it states "In our view, Hockley Trading Centre is a strategically well placed employment location. However, we recognise the ambitions of the Hockley Town Centre masterplan and that within this the Council should consider it to be allocated for other uses. However, we recommend that this reallocation happen only if provision is made within the masterplan for office use within Hockley Town Centre as part of a mixed use scheme." The view of the writers of this document is clear - the Eldon Way Industrial estate (Hockley Trading Centre) is a good employment site and that it is for other reasons that alternative uses are being considered and only then if office development is supported. This supports our representations that new future uses at the Eldon Way site should be employment dominated and that alternative uses should relate to the objectives of the Town Centre which is to enhance the shopping and leisure facilities. Residential is not an appropriate alternative.

This document recommends the use of land to the west of Rayleigh for employment and envisages Green belt release. However, the SCS does not explain through the evidence base why existing employment sites should be 'deallocated' and Green belt land unnecessarily used.

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In addition to these key issues we have some specific concerns. As a consequence we maintain an objection to the second paragraph of Policy H1. This policy states that the Council will seek the redevelopment of various industrial estates including Eldon Way. The Policy says that alternative uses will be sought (presumably alternative to the existing employment offer) and that new land will be allocated elsewhere. This policy statement, in relation to Eldon Way in particular, is unsound for a number of reasons:

The emerging Hockley Area Action Plan consulted upon in 2008 states that the Eldon Way Industrial Estate is strategically well placed. In a sense this statement underplays the true importance of this highly sustainable employment location and only major employment area in Hockley/Hawkwell. The employment area is adjacent to the railway station and located a short distance from the main bus routes that run along Spa Road. Some of the residential areas of the town are also within walking distance of this commercial area, thus providing a potential for sustainable travel by employees. The Eldon Way Industrial Estate is therefore right at the heart of the settlement of Hockley/Hawkwell and provides an opportunity to meet sustainable transport objectives by reducing the need to travel by car. Consequently, this employment area should be highlighted as a premier employment site in sustainability terms, both in the context of PPG13, PPG4 and PPS6. To encourage alternative uses as set out in Policy H1 implies the removal of the majority of employment based activity at Hockley/Hawkwell and this would be contrary to National policy, would not be the most appropriate strategy when considered against alternatives and is therefore unsound.

Whilst it is acknowledged that improvement to the Eldon Way Industrial Estate can and should take place, the extent to which the mix of employment uses should be altered in favour of alternative land uses requires careful consideration. It is our view that a mix of existing or indeed new employment land uses with some Town Centre type uses should dominate the Eldon Way site. A mix of employment types between offices, light industry and other high technology industries should be encouraged as this will provide many locational advantages to the firms that agglomerate together. The Council says that the existing uses on this site are harmful to amenity. However, the site has operated for many years without any significant issues and if renewal for B1 type uses are encouraged then the employment area can be maintained without harm to amenity. Renewal of the employment stock can help develop and improve trade, improve the sustainability of businesses as a whole and make for a more flexible labour market as skill levels are varied. A singularly different use altogether or a variety of uses which excludes employment could undermine the long term sustainability of the area and Town Centre. As such Policy H1 is not an effective strategy and should be amended to acknowledge the importance of Eldon Way and the need to renew the employment stock to ensure that the site maintains its important role as a employment site, albeit with some ancillary alternative use development where appropriate.

The 2008 Retail Study notes that Hockley Town Centre is not strong and there is trade leakage. Eldon Way Industrial Estate provides a customer base for existing town centre uses. Weekday spending within town centres is an important contributor to the viability of many retail and leisure businesses either through expenditure by employees during the lunchtime trade or expenditure by employers, on necessary goods and services. This relationship helps sustain the critical mass of a centre and provides a platform for new retail and leisure growth. It is important to have a balanced centre with a variety of uses. Policy H1, as currently drafted, implies the removal of employment related development and this is likely to harm the vitality and viability of Hockley Town Centre. The Council has presented no evidence to suggest that this is not the case. Importantly, the 2008 Retail Study explains that there is a need for additional retail and office space. In principle we would support additional office and other B1 type uses plus retail but employment uses should always dominate for the sustainability reasons given above. Retail and office development are likely to present a viable alternative to some of the more industrial type uses.

Consequently, we do not support the phrasing of the third paragraph of Policy H1 and maintain that the most appropriate strategy is to seek renewal of the employment stock with employment based uses and with some new retail development. Removal of employment land uses completely as currently implied-which was the approach adopted in the emerging Hockley Area Action Plan - is not a justifiable strategy.

One of the key tests of a Core Strategy is consistency between policies in the emerging Plan and this strikes at the heart of demonstrating an effective strategy. Policy H1 implies alternative uses to employment and the relocation of Eldon Way to a site identified under Policy ED4. However, Policy RTC6 sets out a suite of policy criteria for Hockley Town Centre which includes employment and commercial activities. In addition Policy ED3 seeks the protection of sustainable employment sites (Eldon Way) and notes that some reallocation of existing employment sites will include a proportion of employment. It notes that in the case of Eldon Way employment development will form a component. The policies appear at odds with one another. The third paragraph of Policy H1 should be deleted as the second paragraph is sufficient to set a strategic context for delivering new housing development. The employment policies and Hockley specific policies should be left to consider the type and quantum of land uses appropriate in the area. If the third paragraph of H1 is to be retained then it should tie in more with Policy RTC6 and in our view explain that employment uses should dominate any redevelopment proposals for the Eldon Way site and that retail and leisure uses should be a supporting proportion.

Implementation, Monitoring and Delivery - page 132 onwards

One of the key tests of soundness is that the Core Strategy should be effective - it should be able to deliver its strategy. The Implementation strategy set out at page 132 onwards of the Core Strategy does not explain how Policy H1, RTC6 and the strategy for redeveloping Eldon Way (Policy ED2 and ED3) will be delivered. The comment at Policy ED3 on

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page 161 identifies it as a potential risk and alludes to land assembly difficulties and the choices to be made by owner/occupiers. In order to deliver the strategy there should be a clear understanding as to whether the new land use values being promoted are sufficient to encourage relocation voluntarily. Secondly there is a need for more information to be gathered and presented to show that current occupiers and landowners are willing to relocate and the timescales likely for this. For example, do the building lease contracts enable early review or are there any break out clauses. There should be some commentary on whether the Council will engage in compulsory purchase orders to pursue their strategy should the 'encouragement' route fail. As currently drafted there is no clear path to deliver the strategy and the danger is that despite reallocation, the sites identified for redevelopment will not come forward in the plan period. In this regard, evidence to satisfy the test of soundness is not provided.

Policy H2 - General Locations

We support the strategy that new housing growth should be targeted at land South of Hawkwell. This area is suitably located to the urban area of Hockley/Hawkwell and to tie in with the settlement tiers on page 40 of the Submission Core Strategy the same terminology for settlement should be used. This ensures a consistency within the SCS. The choice of this location as a housing growth area is appropriate as it would not contribute to the coalescence of the urban area with Ashingdon (there is existing development between this identified housing area at Rectory Road and Ashingdon and moreover, Rectory Road can form a natural physical boundary for the new Green belt boundary. This area is also well located to the existing road network. Cherry Orchard Way has recently been improved and provides much better accessibility to the proposed housing growth area than any other location around Hockley/Hawkwell. The existing bus routes along Rectory Road also make this location sustainable and the additional housing proposed will help underpin the financial viability of bus routes in this area. Locally there are employment opportunities, including the small commercial estate off Main Road. The Eldon Way Industrial Estate adjacent to the Town Centre also provides the opportunity for employment locally. Extensive public open space, play pitches and built leisure facilities are located just to the north of this area and a community hall is located off Briar Close, nearby. The area to the south of Hockley/Hawkwell is close to local shops on the corner of Heycroft Road and Main Road and there are numerous footpath links between this area and the local community including links via Thorpe Road, Thorpe Close, Briar Close, Hawkwell Park and Park Gardens. The area therefore provides the opportunity to enhance existing links, including cycle links, and contribute towards community integration - more so than other sites on the south side of this settlement. The site is also in the control of one house builder and deliverable.

However, we find that the Policy is not fully consistent with national policy and furthermore needs to be reviewed in order to be justified and effective. We have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with this policy and feel that Green Belt review should be more explicit throughout the SCS. We note that it is only Policy H3 which indicates the need for Green Belt land review. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H2 and certainly Policy H3 and Policy GB1 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary.

Policy H2 - Phasing and Quantum

The 2008 Preferred Core Strategy document indicated that the area south of Hawkwell should deliver 330 dwellings over a phasing period to post 2021 (see Policy H2 and H3 of that document). The SCS reduces the quantum of housing in this area to 175 but expects delivery by 2015. At a broader level the Preferred Options Core Strategy of 2008, (Policy H2) required 1,450 dwellings to 2015 and a further 1,050 by 2021. In the SCS the figures are now 775 and 1,010 respectively.

Since the SHLAA post dates the publication of the SCS, we are uncertain as to the reason why such a significant reduction in quantum of housing and extensions to the residential envelope is considered necessary. Presumably it is the 'new' strategy to redevelop existing employment areas within the settlements that has led to this change. Our representations on this strategy and specifically the Eldon Way Industrial Estate are included elsewhere within our representations. Previously we have commented on the Table at paragraph 4.6 of the Submission Core Strategy and the lack of evidence to underpin that table. It seems odd that in the space of a year the expected requirement for Greenfield sites has effectively halved on the basis of a SHLAA exercise. The community is therefore not able to effectively

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comment on the housing land supply and at this stage the Submission Core Strategy is legally unsound.

That said, we are of the view that the quantum of housing envisaged south of Hockley/Hawkwell should be more than the 175 currently envisage. In coming to this view we have reviewed the Urban Capacity Study and the latest housing figures in the Annual Monitoring Report 2008. We conclude that the shortfall in housing land supply is such that 330 dwellings in this location is appropriate.

The recently published SHLAA is based upon the data obtained from the Urban Capacity Study 2007, a call for sites exercise and data from the Annual Monitoring Report 2008.

The 2007 Urban Capacity Study (UCS)

1. 2007 is widely recognised as being the peak level of house prices in the UK and it was acknowledged by Government and practitioners alike that 2007 house prices were at an unsustainable level. It is our view that utilising the 2007 UCS as an evidence base without reference to the market does not pick up the depressed demand that is likely to now exist. Recent corrections to the housing market now mean that housing land prices are at a much lower and arguably more affordable level than before. The implications are that some pdl may not be viable for housing development. Often brownfield sites have much higher development costs than Greenfield sites and so the yield from urban capacity will be much lower than anticipated in the 2007 study. One example is the employment allocation of the Adopted Local Plan located at 76-92 Main Road, Hawkwell. This site has been allocated for several years and has been available during the most recent rises in residential property prices during 2006-07. As a consequence the lack of progress on the site can only be described by its current occupancy and perhaps it comprises high value uses that do not encourage redevelopment. Despite this the site is identified as having high potential for alternative use and high potential demand. The SHLAA form notes that there is no information on legal constraints (e.g., tenancy agreements) As a consequence it is difficult to see how this could continue to be a potential site and as a consequence the allowance for green field releases should be increased.

2. There are considered to be other instances in the UCS and the recently published SHLAA where the assumptions and calculations would indicate that the 1301 urban capacity figure is over optimistic and the SHLAA assessment is limited. In the assessment of 'non-residential sites in appropriate locations' within the UCS assumptions are made as to the probability of sites coming forward for new housing. 68-72 West Street, Rochford is identified as a high probability site but we note that it has been subject to 7 refusals of planning permission/conservation consent. There is a significant gap between the urban capacity identified as being suitable by the Council and the capacity applied for by the owners. Given its alternate use value, it is debateable whether the two capacity figures can be reconciled. No 247 London Road is another example of a site allocated in the Local Plan but which hasn't come forward. This is now the subject of a proposal for a care home and if approved would further limit the scope for market/affordable housing capacity on the site. A striking example of how the urban capacity study has underestimated is also evidence by 2-4 Alderman's Hill, Hockley - described as a disused service station. There has been no residential development application on this site since 2004 and most recent applications have sought commercial use of the site. Rather than being evidence of housing land deliverability, this particular site evidences the need for commercial uses in the area. There are therefore deliverability doubts over these 'high probability' categories which amount to some 40 units.

3. In relation to the assessment in the UCS entitled 'intensification of existing residential uses' we note that the assessment is premised on an assessment of recent trends taking into account net completions between 2001-2006 and 2005-06. This is effectively an assessment of windfall trends and not an approach that PPS3 encourages. Importantly Table 3-12 in the urban capacity study seeks to project forward urban capacity from residential redevelopment - a period that benefited from high house prices and PPG3 guidance encouraging redevelopment. These two circumstances have markedly changed and so the assumptions and conclusions drawn would also have changed. Even taking into account the UCS discounting, the reliability of the 404 units from this source must be questioned and in our view the 1301 figure cannot be a sound basis for urban capacity and further Greenfield releases are necessary.

4. In the section of the UCS entitled 'subdivision of dwellings' and 'living above the shop' it is estimated that recent trends would result in 7 and 15 units. Our concerns with using trends as a basis for urban capacity are detailed above - PPS3 does not encourage this. Rather, local authorities are charged with surveying their areas, identifying which areas may yield urban capacity and how much and developing policies to achieve that. Government guidance does not encourage the estimation of windfalls in the way the UCS does.

5. Redevelopment of established employment land is a separate section within the UCS. At 1 above we identify the low probability of the Main Road residential allocation coming forward. This remaining section of the UCS considers 11 further employment sites which were first identified in the 2000 UCS. Three of these are considered to have a high probability of coming forward. We have looked at these three sites and can find no evidence that they are likely to come forward. In the 8 years between 2000 and 2008 the three identified high probability employment sites have not been developed and there is no reason to assume that the next 5-10 years will be any different. For example the Rawreth Industrial Estate is identified as being well used in the UCS and although it has some unneighbourly uses there is no indication that the site is available, suitable or deliverable for residential. Land between 39-69 Lower Lambricks, Rayleigh is identified as having a high probability of residential uses. Yet there is no

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evidence of any pre-application advice or planning applications for this area. Stambridge Mills, Mill Lane, Stambridge is a further example. This site is separated from the urban area, in a flood risk zone and protected in the 2006 Replacement Local Plan by Policy EB9 which promotes B1 uses. Against this background there is only two relevant planning applications affecting this area both date from the early 1990's and relate to a plant room and loading bay. There is no evidence that this is likely to come forward for residential purposes in the next 5-10 years.

6. In the UCS extant permissions are identified as 856 dwellings. It is important to note that this figure needs to be continually reassessed so that from the point of adoption of the Core Strategy a 5 and 10 year housing land supply is available. The SHLAA notes extant permissions for 2009-14 being 106. As noted below extant permissions do not necessarily translate into deliverable sites. There is therefore a contingency that needs to be built in. Further allocations on greenfield land need to be increased and as such the quantum of housing in the area south of Hockley/Hawkwell should be increased to 330 dwellings in order to begin to meet the shortfall identified.

The District Council's 5 year housing supply assessment

7. The District Council's Annual Monitoring Report ("AMR") 2008 purports to demonstrate a 5 year housing land supply. The preamble to Table 4.10 in the AMR 2008 explains that Rochford District Council ("RDC") has included units under construction, units with full permission, units with outline permission, units with a resolution to grant, units subject to preapplication discussion/Urban Capacity Assessment and land allocations in its trajectory. The reader is referred to Appendix B which breaks down the sites in more detail. The recently published SHLAA also includes a table showing a potential 1273 dwellings deliverable. However, it refers to "appropriate brownfield sites." Since these 'appropriate sites' are do not benefit from an application or a planning permission it is difficult to programme them into the housing delivery trajectory.

8. In the full planning permission category of the AMR 2008 where work has not yet started there can be no guarantee that all these sites will be delivered in the 5 years. This comment relates to the one above in relation to the recently published SHLAA. It is not uncommon for permissions to be obtained to provide a means for valuing a site where the owner has no immediate plans to sell the site or develop housing. Delivery may also be hampered by funding constraints, or site assembly problems (where sites are in an alternative use or relocation constraints). Appendix B of the AMR 2008 does not set out the intentions of the landowner or whether the sites are truly achievable in the 5 year period as per PPS3 requirements. The SHLAA purports to show developer intentions at Appendix C but the assessment by the local authority into the legitimacy of some of the claims is not presented. The evidence base is not as full as it should be to demonstrate the robustness of Table 4.6 of the SCS. It is also unclear the extent to which this table is based on either the UCS 2007, AMR 2008, SHLAA 2009 or a combination of all three. This should be set out clearly.

9. In addition, to the 'non delivery' of a proportion of new homes in the AMR 2008, there is concern at the timings of delivery in that data set, for example, 10 units in 2008-2009 relates to outline planning permissions and it is doubtful whether reserved matters can be turned round quick enough to begin delivering housing in this year period. There could well be examples in that set of data where the delivery of units in the first year of the 5 is unlikely, thus delivery is reduced for that period and pushed back and this process is then compounded throughout the data set up to and beyond year 5. Statistical evidence from the Department of Communities and Local Government ("CLG") reveals that building starts are 43% down on the quarter to March 2009 compared with March 2008. It is not clear whether the recently published SHLAA has taken this into account and unless it does the data in the Table at 4.6 of the SCS cannot be relied upon, particularly given the current recessionary circumstances. In relation to the Table at Paragraph 4.6 a refinement is therefore needed to take into account this effect on phasing.

10. This problem is compounded for other units relied upon where permission has been granted but no start on site has been made; this accounts for a considerable number of sites in 2009-10 period (100 dwellings) which is (year 2 of the 5 year period). A delay in these will require more Greenfield sites to be identified in order to meet the shortfall.

11. Finally we note that the East of England Plan expresses its land supply requirement as a minimum. This strategy is not reflected in the

Core Strategy Submission Document

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Submission version of the Core Strategy policy H2.

12. In summary since neither the UCS nor the Annual Monitoring Report form a SHLAA, reservations are maintained about the degree to which sufficient housing land has been identified.

Policy H3

In the Preferred Options Core Strategy 2008 more locations were identified for housing growth in the post 2021 phase. Whilst it is our view that land south of Hockley/Hawkwell should benefit from a greater number of dwellings than the 175 currently identified (330) in order to make the strategy effective. We are concerned at the significant change in strategy between the Preferred Option Core Strategy and the Submission version, which has significantly less housing growth on green field sites. This change in strategy is so significant that we would question whether it is appropriate in the context of soundness and the consultation processes that have taken place so far.

We also have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with other policies in the SCS and feel that Green Belt review should be more explicit throughout the SCS. As it currently stands there is a potential conflict with national policies and limited justification for the Green belt strategy. We note that in Policy H3, which indicates the need for Green Belt land review, the advice is limited and unclear. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H3 and Policy GB1/H2 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary. Not to do so is unsound for justification and effectiveness reasons.

Policy H4 - Affordable Housing

As currently drafted we feel that the policy is not concise enough and that the policy does not reflect current guidance. The phrase 'at least' would indicate that in most cases affordable housing above 35% will be sought. Our understanding is that the 35% figure is recommended in the SHMA and that to provide a policy framework which seeks to go beyond that figure would potentially be unworkable as many sites could not financially bare the burden of over a third of the net developable area not yielding a value. The policy should be redrafted so that "a target of 35% affordable housing shall be provided on all developments of 15 or more units..."

The last policy paragraph provides some scope to relax this policy, if there are clear site constraints that make on site provision impossible. The policy, though, is not particularly clear on what would constitute exceptional circumstances. For example, physical site constraints, which unusually raise development costs, would be one such reason and this should be specified. There may be other reasons including the nature of housing needs in the part of the District the site is located which justify affordable housing below the 35% target. Design reasons may also have a bearing on how provision is made and in what form, particularly if the site is in an historic area where design might override housing need argument. It is therefore recommended that the policy expand on the type of circumstances where affordable housing may be relaxed and the type of information that will be sought of applicant's who have a need to invoke this part of the policy.

Policy H5

In support of the policy, it is advantageous that no percentages requiring a specific mix are included. This flexibility will enable developers and the Council to respond directly to changing circumstances in the local housing market. In the past some authorities have set out a percentage for the type of housing they require only to find that after a few years of strict implementation there is an oversupply of property of that type and no flexibility in the policy to address the problem.

Policy ED2 - London Southend Airport

It is considered that to grow non aviation related employment at a location north of Southend Airport where sustainable access from the rest of Rochford District requires careful consideration. Most Airports are serviced by aviation related employment development and as such a location close to the airport is sensible and sustainable. However, for surface access reasons it would be inappropriate to encourage travel from Rochford's main settlements to what essentially

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would be a rural location for general employment uses. Whilst sustainable access would be improved by a railway station and better bus links, there is no evidence to suggest that a sustainable surface access strategy for non related employment development at the Airport can be achieved. Paragraph 11.22 explains the critical importance of a railway station to the delivery of the strategy yet the Transport Chapter and Implementation Chapter provide neither a policy nor an assessment of deliverability. It is also notable that the South Essex Rapid Transit Policy T4, as set out at paragraph 10.16, notes that Rochford is not proposed to be served but may be served in future phases. This uncertainty is no way to plan for a major employment land supply strategy in the District. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley/Hawkwell, Rochford and Rayleigh is unsound.

Policy ED3

We fully support the first sentence of the Policy and note the apparent contradiction with the statements in Policy H1 and elsewhere which seeks to develop on alternative uses at industrial estates such as Eldon Way.

This contradiction is evidence in the second paragraph of Policy ED3. In our representations on Policy H1 we have explained why it is not sound to diminish the employment stock at Eldon Way and the importance of maintaining a dominance of employment type uses at this estate. These arguments are not repeated here.

We note the sentiments of the third paragraph and in accordance with our representations elsewhere are of the view that this sentence should be revised to explain that Eldon Way will accommodate principally employment type uses. As noted elsewhere uses which are an alternative to employment would diminish this highly sustainable employment site and this is unsound when assessed against National Policy.

Policy ED4 - Future Employment Allocations

In part, the de-allocation strategy is not supported as it is considered unsound when set against sustainability criteria. In relation to the Eldon Way Industrial Estate it is considered critical to the ongoing sustainability of this settlement that employment uses are maintained at this location. It is close to the railway station, bus routes and local residential areas from which the opportunity exists for employees to walk or cycle to work. Its location adjacent to the Town Centre offers opportunity for some retail and leisure development to complement the centre and to maintain a supporting function. These sustainable benefits would not occur with the deallocation of Eldon Way or the significant erosion of its employment floorspace. Whilst redevelopment of the employment site to achieve new employment is supported, the dominant land use should continue to be employment use. As a consequence, the 18ha of land required for employment in this policy is considered to be excessive and the policy should be reviewed to explain that redevelopment of existing employment sites for primarily new employment development will be encouraged.

Policy T4

It is noted that the South Essex Rapid Transit policy, as elaborated upon at paragraph 10.16 notes that Rochford is not served but may be served in future phases. This uncertainty is contrary to the delivery principles of soundness and directly puts at issue the employment land supply strategy in the District which is founded on sustainable access to new sites. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley, Rochford and Rayleigh is unsound.

Appendix H1, CTL1 - Infrastructure

It is recognised that necessary infrastructure provision is an important part of creating a sustainable development and in that context appendix H1 is supported. The supporting text notes that the table at Appendix H1 is not exhaustive and in that context it is very important that the framework properly distinguishes between what should be provided as part of new development schemes and what shouldn't. It is therefore essential that the framework acknowledges the importance of Circular 05/05 and the tests which say that provision of infrastructure and/or contributions should be:

- * Relevant to planning
- * Necessary to make the proposed development acceptable in planning terms
- * Directly related to the proposed development
- * Fairly and reasonably related in scale and kind to the proposed development
- * Reasonable in all other respects

As is made clear (Paragraph B9 of Circular 5/05) contributions should not be used to make good existing deficiencies in infrastructure provision. Nor are they to be used to secure contributions to the achievement of wider planning objectives that are not necessary for consent to be granted. In that context the Core Strategy should set this out as its policy framework.

Policy GB1 - Green Belt

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16916 Object

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The objectives of this policy are supported, although as noted in other representations the SCS is unsound as it does not meet the tests in relation to justification, compliance with national policy or effectiveness of strategy.

Policy GB1 mentions the objective to allocate the minimum amount of Green Belt land necessary. The policy should link to the requirements of PPG2 and RSS which are discussed in relation to the representations on Policy H2 and H3. The policy should set out a timeframe for the review and why Rochford requires a Green Belt review (what the exceptional circumstances are in this District that justify a review of local boundaries. The policy should be amended to set out a 2031 time frame and this may require the SCS to have an extended life span beyond 2021.

We would recommend the deletion of the word character since Green Belt designation is not related to landscape character as currently drafted. For clarity we would also recommend that the Policy or its supporting text explain that a Green Belt review will take place in support of an allocations document (paragraph 6.6) in order to identify an appropriate new boundary. This is particularly necessary given the commitment to a Green belt review in the adopted Local Development Scheme.

Policy CLT1 - Planning Obligations and Standard Charges

In view of the need to test fully the basis on which standard charges are based it is important that any document produced is in a development plan document that enables an examination in public. The policy should explain this in order that when the document is produced it accords with Policy and is based on sound evidence.

ENV9 - Code for Sustainable Homes

Object. The advice from the Department of Communities and Local Government is that the new requirement to have a rating against the Code does not make it mandatory to build a Code home or to have each new home assessed against the Code. It does however mean that all buyers of new homes be given clear information about the sustainability of the new home. A house builder can do this in one of two ways:

- they can choose to build a Code home, have that home assessed against the Code and provide the home buyer with a Code certificate stating the star rating the home has achieved
- or, they can choose to build to current building regulations standards, not to pay for an assessment and instead download a nil-rated certificate of non-assessment (also referred to as a nil-rating) to provide to the home buyer.

As such the Rochford policy requirement that coding 3 be achieved by 2010 and Code 6 by 2013 is out of step with Government advice. The policy wording should explain that it is just the coding that is a requirement of new homes and not necessarily that new homes should be constructed to achieve a standard.

The current Government objectives are for the code to be introduced over a reasonable period with development to be code 3 by 2010, code level 4 by 2013 and code level 5 by 2016. In this regard the policy, as drafted, seeks to achieve code 6 by 2013 and consequently compresses the code requirements into a shorter time scale with the costs associated expected to be subsumed within the housing market through higher prices. This is not a realistic strategy for the delivery of sustainable homes and we consider that the policy should be revised to extend the period of compliance but to also make it more flexible based on local circumstances.

Research undertaken on behalf of the Housing Corporation and English Partnerships, published in February 2007 'A cost review of the code for sustainable homes' reveals that code 6 is unlikely to be unattainable given existing technologies and that achieving code 5 could result in a 12% to 20% increase in costs that would have to be passed onto the consumer. Given the variability of the housing market with peaks and troughs, it is unlikely that the housing market would be able to subsume this level of price increase.

The code system policy as currently drafted does not have regard to site circumstances and so many of the requirements could be difficult to meet. For example, micro electricity generation on site may be difficult to achieve where local circumstances deter the capture of wind or solar power. If more expensive technologies are required to generate power than is the norm then costs will rise. There may be other competing reasons why designs cannot include certain sustainability measures if housing sites are in sensitive landscape and historic locations. Alternatively there may be significant development costs associated with site specific circumstances and so viability of the site's development becomes a valid consideration. By insisting on the code for sustainable homes other policy objectives such as affordable housing at particular rates and other contributions may need to be reconsidered. Consequently, we are of the view that this policy should be drafted in a manner which enables site specific circumstances to be taken into account. As noted above the Government explains that the code is a certification requirement and does not necessarily mean that buildings are constructed in accordance with a code level.

It is also important to note that it is not the purpose of planning legislation to duplicate other legislation. In this regard, the policy should accept that the Building Regulations will be the main vehicle for implementing this policy and that unless the coding requires external development then there will be no need to specify what is to be carried out in a planning application.

Core Strategy Submission Document

O - 16916 - 10009 - The efficient use of land for housing, 4.14 - i, ii

16916 Object

CHAPTER 4 The efficient use of land for housing, 4.14

Summary: Paragraph 4.14

We maintain that the strategy for redeveloping the Eldon Way Industrial Estate for housing and other alternative uses to employment is unsound. It is neither justified nor effective. The Industrial Land Availability Study 2006 sets out on page 7 strategic objectives. The 3rd objective seeks to Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive. Clearly the strategy as currently drafted envisages major changes to existing industrial estates, including alternative uses. This strategy is not consistent with other strategies and evidence based studies and so cannot be justified in the context of the tests set out in PPS12. It is also an ineffective strategy since the new employment locations that would free up the Eldon Way site for redevelopment relies on transport infrastructure that has no certainty of being delivered. Principally, the erosion of employment uses at Eldon Way could make the settlement of Hockley/Hawkwell less sustainable and thus conflict with the tiered approach on page 40, paragraph 4.9.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i, ii

Core Strategy Submission Document

S - 15971 - 13441 - The efficient use of land for housing, 4.15 - None

15971 Support

CHAPTER 4 The efficient use of land for housing, 4.15

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: The Government's target of providing 60% of new housing development on previously developed land is applied nationally. Local rates of new development on PDL will diverge from the national target according to circumstances in each authority. Some sites are not necessarily suitable for housing.

Summary: The Government's target of providing 60% of new housing development on previously developed land is applied nationally. Local rates of new development on PDL will diverge from the national target according to circumstances in each authority. Some sites are not necessarily suitable for housing.

Change to Plan N/A

Appear at exam? Not Specified

Soundness Tests N/A

Core Strategy Submission Document

O - 15845 - 4951 - Policy H1 - The efficient use of land for housing - i, ii, iii

15845 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Hockley Residents Association (Mr B Guyett) [4951] **Agent:** N/A

Hockley Residents Association
2 Tonbridge Road
Hockley
Essex
SS5 5HL

Full Text: RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates
i. The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely
i. the Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!
i. The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Summary: RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates
i. The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely
i. the Foundry Industrial Estate has never even been previously mentioned;
i. The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Change to Plan Defer all of Hockley Town Centre and include in the ongoing HAAP consultation

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 15846 - 4951 - Policy H1 - The efficient use of land for housing - i, ii, iii

15846 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Hockley Residents Association (Mr B Guyett) [4951] **Agent:** N/A

Hockley Residents Association
2 Tonbridge Road
Hockley
Essex
SS5 5HL

Full Text: Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary: The Core Strategy proposals pre-empt the next stage of the HAAP consultation.

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates.

If a decision is taken now, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Change to Plan Defer all of Hockley Town Centre to the ongoing HAAP consultation

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 15848 - 4951 - Policy H1 - The efficient use of land for housing - i, ii, iii

15848 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Hockley Residents Association (Mr B Guyett) [4951] **Agent:** N/A

Hockley Residents Association
2 Tonbridge Road
Hockley
Essex
SS5 5HL

Full Text: PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

Summary: PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

Change to Plan RDC to clarify policy

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 15849 - 4951 - Policy H1 - The efficient use of land for housing - i, ii, iii

15849 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Hockley Residents Association (Mr B Guyett) [4951] **Agent:** N/A

Hockley Residents Association
2 Tonbridge Road
Hockley
Essex
SS5 5HL

Full Text: THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.
 - 2) (10.28) "There is no immediate capacity for additional floor space."
 - 3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion"
 - 4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".
- The Core Strategy is inaccurate, misleading and unsound.

Summary: THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace".

Whereas, the R&LS states:

- 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.
- 2) "There is no immediate capacity for additional floor space."
- 3) "we recommend that focus be maintained on developing Hockley's existing strengths."
- 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Change to Plan Delete Hockley Town Centre from list of housing sites

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 15856 - 7986 - Policy H1 - The efficient use of land for housing - i

15856 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Mr Steven Tautz [7986]

105 Downhall Park Way
Rayleigh
Essex
SS6 9QZ
UK
01268 780038

Agent: N/A

Full Text: I feel that the plan is unsound and that the farmland should be saved to prevent urban sprawl to the west of Rayleigh. By not building on farmland it will safeguard the countryside from encroachment. Other brown field sites should be used that are available before any greenbelt is considered. The plan is supposed to protect community character and identity yet will double the population of Raweth. Building here will put unsustainable pressure on Rayleigh's roads and amenities. There is not enough places now for local children in the schools in the west Rayleigh area, Raweth Lane is a solid traffic jam during morning and evening rush hours. The local infrastructure simply can't cope with a further 770 houses.

Summary: Raweth and west Rayleigh can't cope with 770 extra houses.

Change to Plan If any building has to take place in the area it should take place only on the brown belt sites

Appear at exam? No **Soundness Tests** i

Core Strategy Submission Document

O - 15860 - 12083 - Policy H1 - The efficient use of land for housing - i, ii

15860 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Mr Paul Sealey [12083]

Agent: N/A

Kirrin,
Hockley Rise,
Hockley
SS5 4PT
United Kingdom
01702206888

Full Text: This policy appears to have decided that, in particular, Eldon Way/Foundry sites will be redeveloped. However, the Hockley Area Action Plan - issues and options consultation gives the impression that this has not been decided. There may be alternatives that emerge and the policy would be inflexible.

Summary: This policy appears to have decided that, in particular, Eldon Way/Foundry sites will be redeveloped. However, the Hockley Area Action Plan - issues and options consultation gives the impression that this has not been decided. There may be alternatives that emerge and the policy would be inflexible.

Change to Plan Remove the specific areas from the policy until consultation on the area action plan has been completed.

Appear at exam? No

Soundness Tests i, ii

Core Strategy Submission Document

O - 15885 - 14110 - Policy H1 - The efficient use of land for housing - i, ii

15885 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Mr Barrie Stone [14110]

Mr Barrie Stone
Lady Spring Wood
Dunton Road
Billericay
Essex

CM12 9TZ

Agent: Whirledge & Nott (Ms K Jennings) [5094]

Whirledge & Nott
The Black Barn
Lubards Lodge Farm
Hullbridge Road
Rayleigh
Essex

SS6 9QG

Full Text: We are supportive of the majority of the Policy H1 and believe it to be sound as it has acknowledged the need to develop in the Green Belt adjacent to urban boundaries. However it is questionable on the evidence whether the site at Stambridge Mills is sustainable or deliverable. The inclusion of this site as an identified area for development is unsound as there is no evidence to assert it will be deliverable because of flood risk. The non delivery of this site will place an increased demand for housing allocation which should be recognised in H2

Summary: We are supportive of the majority of the Policy H1 and believe it to be sound as it has acknowledged the need to develop in the Green Belt adjacent to urban boundaries. However it is questionable on the evidence whether the site at Stambridge Mills is sustainable or deliverable. The inclusion of this site as an identified area for development is unsound as there is no evidence to assert it will be deliverable because of flood risk. The non delivery of this site will place an increased demand for housing allocation which should be recognised in H2

Change to Plan Remove reference to Stambridge Muills and include area south of Rayleigh/ Eastwood Nurseries as alternative location for housing development.

Appear at exam? No

Soundness Tests i, ii

Core Strategy Submission Document

O - 15888 - 14113 - Policy H1 - The efficient use of land for housing - ii

15888 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Sanctuary housing association (Miss Sarah Brind) **Agent:** N/A
[14113]

Sanctuary housing association
Collier House
Mead Lane
Hertford
SG13 7UZ
01992 513441

Full Text: We would welcome prioritising brown land for development, but note later comments on limiting density. The costs of developing Brown land (dealing with previous buildings, contamination, etc) are often high, and unless a reasonable density of development is allowed on brown land, the costs per property can be uneconomic.

Summary: We would welcome prioritising brown land for development, but note later comments on limiting density. The costs of developing Brown land (dealing with previous buildings, contamination, etc) are often high, and unless a reasonable density of development is allowed on brown land, the costs per property can be uneconomic.

Change to Plan Consider increasing density of development allowed on brown land.

Appear at exam? No **Soundness Tests** ii

Core Strategy Submission Document

O - 15897 - 11793 - Policy H1 - The efficient use of land for housing - i, ii

15897 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Mr Brian Guyett [11793]

2 Tonbridge Road,
Hockley
SS55HL
United Kingdom
07736211248

Agent: N/A

Full Text: Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary: Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

Change to Plan Revise approach

Appear at exam? No

Soundness Tests i, ii

Core Strategy Submission Document

O - 15907 - 11793 - Policy H1 - The efficient use of land for housing - i, ii, iii

15907 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Mr Brian Guyett [11793]

2 Tonbridge Road,
Hockley
SS55HL
United Kingdom
07736211248

Agent: N/A

Full Text:

RDC not consulted on proposals to relocate the Eldon Way and Foundry Industrial Estates

EW; CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" absolutely no consultation on concept of moving EW businesses entirely

FIE; has never even been previously mentioned in any plan version; CS states omission was due to typing error!

Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

RDC not consulted on proposals to relocate the Eldon Way and Foundry Industrial Estates

EW; CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" absolutely no consultation on concept of moving EW businesses entirely

FIE; has never even been previously mentioned in any plan version; CS states omission was due to typing error!

Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus proposals are not founded on a robust and credible evidence base and are unsound.

Change to Plan

Defer proposals and include in HAAP

Appear at exam? No

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 15910 - 11793 - Policy H1 - The efficient use of land for housing - i, ii, iii

15910 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Mr Brian Guyett [11793]

2 Tonbridge Road,
Hockley
SS55HL
United Kingdom
07736211248

Agent: N/A

Full Text: The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound

Summary: The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound

Change to Plan Defer to HAAP

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 15912 - 11793 - Policy H1 - The efficient use of land for housing - i, ii, iii

15912 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Mr Brian Guyett [11793]

2 Tonbridge Road,
Hockley
SS55HL
United Kingdom
07736211248

Agent: N/A

Full Text: The CS totally misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The CS states "The R&LS states Hockley has great potential and has a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) "does not lend itself to a food store capable of retaining a significant proportion of main food shopping expenditure.
- 2) "there is no immediate capacity for additional floor space."
- 3) "recommend that focus be maintained on developing Hockley's existing strengths."
- 4) " the Council may wish to consider reclassifying Hockley from a town center, to a district center".
- 5) "we do not consider it to meet the definition of a 'town centre' as set out by PPS6"

Summary: The CS totally misrepresents the R&LS and states "Hockley has great potential and has a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) "does not lend itself to a food store capable of retaining a significant proportion of main food shopping expenditure.
- 2) "there is no immediate capacity for additional floor space."
- 3) "recommend that focus be maintained on developing Hockley's existing strengths."
- 4) " the Council may wish to consider reclassifying Hockley from a town center, to a district center".
- 5) "we do not consider it to meet the definition of a 'town centre' as set out by PPS6"

Change to Plan Revise policy and include in HAAP

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

15913 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Mr David Grew [9936]

PO Box 2091
Hockley
Essex
SS5 4WR
UK
07740201389

Agent: Mr David Grew [9936]

PO Box 2091
Hockley
Essex
SS5 4WR
UK
07740201389

Full Text: There is more capacity for intensification in existing settlements before releasing this amount of Green Belt. RDC has provided no evidence of harm to the character of existing settlements which have low densities. DPD is unsound, RDC has not provided justification for the release of Green Belt and is not consistent with national policy which aims to reduce the need to travel by private car by locating development in sustainable locations which offer good access to jobs, key services and infrastructure. It is not legally compliant as it does not conform to the RSS or national policies.

Summary: There is more capacity for intensification in existing settlements before releasing this amount of Green Belt. RDC has provided no evidence of harm to the character of existing settlements which have low densities. DPD is unsound, RDC has not provided justification for the release of Green Belt and is not consistent with national policy which aims to reduce the need to travel by private car by locating development in sustainable locations which offer good access to jobs, key services and infrastructure. It is not legally compliant as it does not conform to the RSS or national policies.

Change to Plan Intensification of existing settlements should be encouraged before release of Green Belt. Green Belt sites that are released should be assessed against proximity to existing services and transport links, particularly railway stations. This would reduce the need to travel by private car in accordance with the principles of sustainable development set out in paragraph 4.8 of this Core Strategy.

Appear at exam? No

Soundness Tests i, iii

Core Strategy Submission Document

O - 15937 - 9032 - Policy H1 - The efficient use of land for housing - i, ii

15937 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Essex Chambers of Commerce (Mr John Dallaway) **Agent:** N/A
[9032]

Essex Chambers of Commerce
2nd Floor,
Viscount House,
London Southend Airport, Southend-on-Sea.
Essex.
SS2 6YF
01702-560100

Full Text: Stambridge Mills Industrial site will be unsustainable for housing due to flood risk and the potential mitigation costs and therefore should be retained for light industrial use. Alternative site for housing needs to be allocated.

Summary: Stambridge Mills Industrial site will be unsustainable for housing due to flood risk and the potential mitigation costs and therefore should be retained for light industrial use. Alternative site for housing needs to be allocated.

Change to Plan Do not believe this site is sustainable or deliverable for housing and an alternative site should be allocated. Stambridge Mills should be actively marketed as a light industrial site.

Appear at exam? No **Soundness Tests** i, ii

Core Strategy Submission Document

S - 15972 - 13441 - Policy H1 - The efficient use of land for housing - None

15972 Support

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: A comprehensive policy, although it could be criteria-based.

Summary: A comprehensive policy, although it could be criteria-based.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16011 - 14146 - Policy H1 - The efficient use of land for housing - i, ii, iii

16011 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Mr H Snell [14146]

Greensleeves
57 High Road
Hockley

SS5 4SZ

Agent: Capita Symonds (Mr David Spencer) [14145]

Capita Symonds
Elizabeth House
Walpole Loke
Dereham
Norfolk
NR19 1EE
England
01362656889

Full Text: Whilst the priority for brownfield land is supported, the inclusion of Stambridge Mills is unsound. There is scant evidence on the absolute need to re-use land in the flood zone to deliver the housing numbers for Rochford when alternative and deliverable options exist in areas of lower or no flood risk (i.e. land to west of Hockley). This approach is inconsistent with the sequential approach contained in policy in PPS25.

Summary: Whilst the priority for brownfield land is supported, the inclusion of Stambridge Mills is unsound. There is scant evidence on the absolute need to re-use land in the flood zone to deliver the housing numbers for Rochford when alternative and deliverable options exist in areas of lower or no flood risk (i.e. land to west of Hockley). This approach is inconsistent with the sequential approach contained in policy in PPS25.

Change to Plan Stambridge Mills should be deleted from H1 and the balance be re-allocated to sustainable locations in flood zone 1, as per the policy in PPS25. Sustainable and deliverable locations include land to the west of Hockley.

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16012 - 10324 - Policy H1 - The efficient use of land for housing - i, ii, iii

16012 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Mrs Jennifer Abbey [10324]

3 Claybrick Avenue
Hockley
Essex
SS5 4PS
UK
07768 542634

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;

â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

Change to Plan Revise approach

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16024 - 10324 - Policy H1 - The efficient use of land for housing - i, ii, iii

16024 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Mrs Jennifer Abbey [10324]

3 Claybrick Avenue
Hockley
Essex
SS5 4PS
UK
07768 542634

Agent: N/A

Full Text: RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates
â€¢ The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely
â€¢ The Foundry Industrial Estate has never even been previously mentioned;
â€¢ The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Summary: Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.
RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates
â€¢ The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely
â€¢ The Foundry Industrial Estate has never even been previously mentioned;
â€¢ The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Change to Plan Defer proposals and include in HAAP

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16026 - 10324 - Policy H1 - The efficient use of land for housing - i, ii, iii

16026 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Mrs Jennifer Abbey [10324]

3 Claybrick Avenue
Hockley
Essex
SS5 4PS
UK
07768 542634

Agent: N/A

Full Text: Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary: The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Change to Plan Defer to HAAP

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16028 - 10324 - Policy H1 - The efficient use of land for housing - i, ii, iii

16028 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Mrs Jennifer Abbey [10324]

3 Claybrick Avenue
Hockley
Essex
SS5 4PS
UK
07768 542634

Agent: N/A

Full Text: THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.
 - 2) (10.28) "There is no immediate capacity for additional floor space."
 - 3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion"
 - 4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".
- The Core Strategy is inaccurate, misleading and unsound.

Summary: The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Change to Plan Revise policy and include in HAAP

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16050 - 9599 - Policy H1 - The efficient use of land for housing - i, ii

16050 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Mrs Fiona Jury [9599]

WGDP Ltd
Cross Keys House
22 Queen Street
Salisbury
SP1 3EY

Agent: N/A

Full Text: The general approach to the identification and efficient use of land for housing is supported, however, the redevelopment of the four existing employment sites is unrealistic in the timescale proposed. It is also counter-productive to the strategy, as it does not represent sustainable practice or meet the test of soundness. It will require the allocation of alternative employment land in the Green Belt to accommodate the displaced businesses. It would be more appropriate to upgrade existing employment sites where possible, and identify additional land on the edge of the most sustainable settlements to accommodate future housing growth.

Summary: The general approach to the identification and efficient use of land for housing is supported, however, the redevelopment of the four existing employment sites is unrealistic in the timescale proposed. It is also counter-productive to the strategy, as it does not represent sustainable practice or meet the test of soundness. It will require the allocation of alternative employment land in the Green Belt to accommodate the displaced businesses. It would be more appropriate to upgrade existing employment sites where possible, and identify additional land on the edge of the most sustainable settlements to accommodate future housing growth.

Change to Plan H1 fails the test of soundness, as the inclusion of the four existing employment sites has not been founded on a robust evidence base, nor are they deliverable or consistent with national policy i.e. Stambidge Mills. In order to make the DPD sound, the employment sites should be deleted, and additional land in the most sustainable locations involving a Green Belt review should be identified in order to accommodate the residual balance of the housing requirement.

Appear at exam? Yes

Soundness Tests i, ii

Core Strategy Submission Document

S - 16094 - 14107 - Policy H1 - The efficient use of land for housing - None

16094 Support

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: Agree, however, if and when developments take place at Stambridge Mills a 106 Agreement should be sought to be able to build a bridge over the Roach for an alternative entrance/exit to the site with potential to link up to Fossetts Farm. This could also be applied to the current proposed development for Coombes Farm. From a trading point of view, the Chamber welcomes additional housing to the east of Rochford, but seeks additional infrastructure for existing and potential new housing to the east of Rochford to relieve the necessity to access them through the centre of Rochford.

Summary: Agree, however, if and when developments take place at Stambridge Mills a 106 Agreement should be sought to be able to build a bridge over the Roach for an alternative entrance/exit to the site with potential to link up to Fossetts Farm. This could also be applied to the current proposed development for Coombes Farm. From a trading point of view, the Chamber welcomes additional housing to the east of Rochford, but seeks additional infrastructure for existing and potential new housing to the east of Rochford to relieve the necessity to access them through the centre of Rochford.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16121 - 7984 - Policy H1 - The efficient use of land for housing - i

16121 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Hockley Parish Plan Group (Mr T Gleadall) [7984] **Agent:** N/A

Hockley Parish Plan Group
2 Wood End
Hockley
Essex
SS5 4QL
01702 202892

Full Text: HPPG objects to the redevelopment of Eldon Way Industrial Estate for residential purposes. The proposal was not included in the October 2008 version, hence did not go through public consultation. It is unacceptable to Hockley residents because: Hockley Parish Plan published October 2007 recommends no housing development in Hockley, and, if enforced, must not include large housing estates or the loss of greenbelt (both criteria have been ignored). A Resident Survey completed October 2009 concluded that only 13% of residents supported redevelopment of Eldon Way and, if redeveloped, housing development received only just over 1% of response support..

Summary: HPPG objects to the redevelopment of Eldon Way Industrial Estate for residential purposes. The proposal was not included in the October 2008 version, hence did not go through public consultation. It is unacceptable to Hockley residents because: Hockley Parish Plan published October 2007 recommends no housing development in Hockley, and, if enforced, must not include large housing estates or the loss of greenbelt (both criteria have been ignored). A Resident Survey completed October 2009 concluded that only 13% of residents supported redevelopment of Eldon Way and, if redeveloped, housing development received only just over 1% of response support..

Change to Plan Redevelopment of Eldon Way should have gone through public consultation before inclusion in the final version of the Core Strategy. See HPPG comments on infrastructure for further reasoning.

Appear at exam? No

Soundness Tests i

Core Strategy Submission Document

O - 16129 - 10324 - Policy H1 - The efficient use of land for housing - i, ii

16129 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Mrs Jennifer Abbey [10324]

3 Claybrick Avenue
Hockley
Essex
SS5 4PS
UK
07768 542634

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;

â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle path".

The Core Strategy also contravenes its own policy T1 and is unsound.

Change to Plan Revise approach.

Appear at exam? No

Soundness Tests i, ii

Core Strategy Submission Document

O - 16144 - 4951 - Policy H1 - The efficient use of land for housing - i, ii, iii

16144 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Hockley Residents Association (Mr B Guyett) [4951] **Agent:** N/A

Hockley Residents Association
2 Tonbridge Road
Hockley
Essex
SS5 5HL

Full Text: Previous consultations and public opinion ignored by RDC and HAAP pre-empted:
As well as ignoring the Parish Plan and the 95% rejection rate of the HAAP proposals, the Core Strategy proposals pre-empt the next round of the HAAP.

Public opinion in Hockley is strongly against both the HAAP and Core Strategy proposals for Hockley Village Centre. A survey undertaken in October 2009 had 972 responses (over 20% of households) and the key results were:
- shops: only 5% in favour of major redevelopment (43% supported moderate redevelopment and 52% only wanted minor improvements)
- Eldon Way & Foundry Industrial Estates: just 13% wanted major change with a youth centre suggested as the most popular improvement.
- Roads: nearly 2/3rds wanted to retain a roundabout at the Spa Junction instead of traffic lights proposed by RDC.

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary: Summary:
Previous consultations ignored by RDC and HAAP pre-empted:
The proposals ignore both the Parish Plan and the 95% rejection rate of respondents to RDC's own HAAP Consultation (2009), which included specific proposals for Eldon Way (but did not even mention the Foundry Industrial Estate).
A survey completed by 972 residents in October 2009 also confirmed the public's rejection with only 5% in favour of redeveloping the shops and only 13% supporting redevelopment of the industrial estate.
Thus the proposals are not founded on a robust and credible evidence base and are unsound

Change to Plan Defer to next round of HAAP

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16149 - 9823 - Policy H1 - The efficient use of land for housing - i

16149 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: mr alistir matthews [9823]

Agent: N/A

telfords farm
chelmsford road
battlesbridge
wickford
SS118TR
uk
01268732069

Full Text: objectives are flawed as several sites were put forward on previously used sites and have been rejected in favour of easily achievable green belt sites. Wish list for infrastructure is unsound as numbers of houses could not supply sufficient funds. It has been continuously emphasised that this document is non site specific but specific sites are identified whilst others are sufficiently vague to create confusion.

Summary: objectives are flawed as several sites were put forward on previously used sites and have been rejected in favour of easily achievable green belt sites. Wish list for infrastructure is unsound as numbers of houses could not supply sufficient funds. It has been continuously emphasised that this document is non site specific but specific sites are identified whilst others are sufficiently vague to create confusion.

Change to Plan There is a need be site specific governed by Council not by private landowners and developers agendas.

Appear at exam? No

Soundness Tests i

Core Strategy Submission Document

O - 16158 - 10324 - Policy H1 - The efficient use of land for housing - i, ii, iii

16158 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Mrs Jennifer Abbey [10324]

Agent: N/A

3 Claybrick Avenue
Hockley
Essex
SS5 4PS
UK
07768 542634

Full Text: PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

Summary: PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

Change to Plan RDC to clarify policy.

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16161 - 12947 - Policy H1 - The efficient use of land for housing - ii, iii

16161 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: West Rochford Action Group (Mrs Alison Henwood) [12947]
West Rochford Action Group
16 St Andrews Road,
Rochford,
Essex
SS4 1NP
England
01702531513

Agent: N/A

Full Text:

This submission is made on behalf of the West Rochford Action Group and its members. Further details sent under separate cover: email and by hand.

H1 Efficient use of land for housing.

Only 4 brownfield sites have been identified in this policy for redevelopment Star Lane Industrial estate, Stambridge Mills, Eldon Way Industrial Estates and Rawreth Lane Industrial estate, Rayleigh. However there are others which have not been included despite the statement that the Council will prioritise the use of previously developed land. The Brickfields site off Cherry Orchard Way is not mentioned and would provide an additional site and be more appropriate in land use terms. On the Rochford Town Centre Plan further sites are being considered namely the Rose and Crown Car Park and adjoining shops, Whittinghams garage. There are further sites which were previously being considered by the Council in 2007 which are not mentioned - these should all be assessed and utilised in preference to green belt sites.

PPG3 on housing requires Local authorities to promote more sustainable patterns of development and make better use of previously developed land the focus for additional housing should be existing towns and cities. PPG3 requires LAs to build in ways which exploit and deliver accessibility by public transport to jobs education and health facilities shopping and local services.

The Core Strategy does not provide for a proper annual monitoring and review of brownfield sites or a policy which states that as brownfield sites come forward the proposed green belt sites will be abandoned. There is no reason why such a policy should not be adopted.

See supporting document, Council ref AE28

Summary:

Unsound as policy is not the most appropriate strategy for meeting the objectives of prioritising housing on brownfield sites.

See supporting document, Council ref AE28

Change to Plan

Revised policy to reflect the above.

Appear at exam?

Yes

Soundness Tests

ii, iii

Core Strategy Submission Document

S - 16173 - 5322 - Policy H1 - The efficient use of land for housing - None

16173 Support

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Pond Chase Nurseries Ltd [5322]

Pond Chase Nurseries Ltd
Folly Lane
Hockley
Essex
SS5 4SR

Agent: Boyer Planning Ltd (Mr R Ricks) [8313]

Boyer Planning Ltd
49 North Hill
Colchester
Essex
CO1 1PY
01206 769018

Full Text: The way in which sites may be allocated within the Allocations development plan document should be guided by an additional level within the sequential approach. The Core Strategy objectives in relation to Green Belt seek to continue to protect the openness and character of the Green Belt and to balance that with the minimum amount of release of such land to meet the District's housing and employment needs.

The sequential approach of Policy H1 should indicate that land to be allocated for development, as extensions to residential envelopes should prioritise previously developed land and other built sites that are now redundant.

Summary: The way in which sites may be allocated within the Allocations development plan document should be guided by an additional level within the sequential approach. The Core Strategy objectives in relation to Green Belt seek to continue to protect the openness and character of the Green Belt and to balance that with the minimum amount of release of such land to meet the District's housing and employment needs.

The sequential approach of Policy H1 should indicate that land to be allocated for development, as extensions to residential envelopes should prioritise previously developed land and other built sites that are now redundant.

Change to Plan N/A

Appear at exam? Not Specified

Soundness Tests N/A

Core Strategy Submission Document

S - 16190 - 9917 - Policy H1 - The efficient use of land for housing - None

16190 Support

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Inner London Group [9917]

Inner London Group
P.O. Box 91
Benfleet,
Essex
SS7 2FF

Agent: Christopher Wickham Associates (Mr C Wickham)
[4961]

Christopher Wickham Associates
35 High Street
Highgate
London
N6 5JT

Full Text: The approach of prioritising the re-use of previously developed land is sound and supported. The redevelopment of vacant industrial land at Stambridge Mills and at the former Star Lane Brickworks site (part of Star Lane Industrial Estate) will reduce the need to release Green Belt land, and will allow for the removal of contamination, the re-use of existing on-site materials, and the environmental and ecological enhancement of the sites and their surroundings. In respect of Stambridge Mills, the need to satisfy the PPS25 exceptions test follows the successful completion of the sequential test.

Summary: The approach of prioritising the re-use of previously developed land is sound and supported. The redevelopment of vacant industrial land at Stambridge Mills and at the former Star Lane Brickworks site (part of Star Lane Industrial Estate) will reduce the need to release Green Belt land, and will allow for the removal of contamination, the re-use of existing on-site materials, and the environmental and ecological enhancement of the sites and their surroundings. In respect of Stambridge Mills, the need to satisfy the PPS25 exceptions test follows the successful completion of the sequential test.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16197 - 9891 - Policy H1 - The efficient use of land for housing - i, iii

16197 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Stolkin and Clements (Southend) LLP [9891]

Stolkin and Clements (Southend) LLP
Hawkley House
28 Chapel Street
Billericay
CM12 9LU

Agent: Firstplan (Ms K Matthews) [8501]

Firstplan
25 Floral Street
London
WC2E 9DS
020 7031 8210

Full Text:

In our view, the Core Strategy is unsound because draft Policy H1 is not justified. It is not founded on a credible and robust evidence base and may be inconsistent with National Policy.

In our opinion, it is a sound planning principle to deliver a significant amount of the housing requirement through extensions to residential envelopes.

However, the policy proposes that the employment areas of the Rawreth Lane Industrial Estate, Eldon Way/Foundry Industrial Estate, Stambridge Mills and Star Lane Industrial Estate should be redeveloped for other uses including residential development. The number of residential dwellings envisaged on these sites is unclear, but there are discrepancies between the Urban Capacity Study (UCS) (2007) and the SHLAA summary table, as highlighted below:-

Site	UCS identified potential capacity (dwellings)	SHLAA summary table figure (dwellings)
Star Lane, Great Wakering 88		175
Rawreth Industrial estate 220		220
Stambridge Mills 60		300
Eldon Way 118		-

The figures for the employment land sites will impact on the level of dwellings identified in Policies H2 and H3. It is therefore important that these are indicated in the Core Strategy.

Furthermore, the proposal to designate alternative employment land elsewhere is unsound. The amount of land, types of uses and location of the site are not set out in the draft policy. Nor are the details discussed in the GVA Grimley Employment Land Study (2008). It therefore is not justified on a robust or credible evidence base.

The land could in fact be our client's site 'Tithe Park'. However, this is unclear.

The alternative employment land is likely to be located within the green belt, which by virtue of the nature of employment uses, may have a greater impact than would be the case with additional residential development. In light of this, the strategy of reallocating employment land for dwellings may not be realistic or sustainable and inconsistent with PPG2.

In conclusion, without the SHLAA being made available at this important stage of the plan making process, the policy is not justified because it is not founded on a credible and robust evidence base.

Summary:

Draft Policy H1 is not justified and may be inconsistent with National Policy.

With regard to redeveloping employment areas, this is not clearly justified. The figures for the sites will impact on Policies H2 and H3 and, therefore should be indicated in the Core Strategy.

The proposal to designate alternative employment land elsewhere is unsound. The alternative land is likely to be within the green belt, and may have a greater impact than additional residential development.

Without the SHLAA being made available at this important stage, the policy is not justified.

Additional evidence supplied, Council ref AE26

Change to Plan

Amend Policy H1 to reflect our representations.

Appear at exam?

Yes

Soundness Tests

i, iii

Core Strategy Submission Document

O - 16203 - 9935 - Policy H1 - The efficient use of land for housing - i

16203 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: CPREssex (Mrs Valerie Stanton) [9935]

Agent: N/A

CPREssex
Hillcrest Farm
Lark Hil Road
Canewdon
SS4 3RZ
Essex

Full Text: House Policy - General

CPREssex is very concerned at the policies for new housing which state that there is a lack of brownfield sites and therefore Green Belt must be released for development. The quantity of brownfield sites is not static. More will be created during the plan period. There seems to be no consideration even in the section on monitoring that further brownfield sites may become available before or after 2021. If such sites come forward the need for Green belt sites would be reduced.

In order to reduce the amount of building on Green Belt land it is important that a constant review is maintained of all available/likely brownfield sites within or adjacent to the urban areas of the District.

Summary: The policies are unsound because the Core Strategy does not take into account the fact that the supply of brownfield sites is not static.

If further brownfield sites come forward this should trigger a review of the need to release land from the Green Belt. The Strategy needs to contain such a Police.cxc

Change to Plan The policies are unsound because the Core Strategy does not take into account the fact that the supply of brownfield sites is not static.

If further brownfield sites come forward this should trigger a review of the need to release land from the Green Belt.

The Strategy needs to contain such a Policy.

Appear at exam? No

Soundness Tests i

Core Strategy Submission Document

O - 16204 - 8650 - Policy H1 - The efficient use of land for housing - ii, iii

16204 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Countryside Properties (Southern) Ltd (Mr Steve Price) [8650] **Agent:** N/A

Countryside Properties (Southern) Ltd
Countryside House
The Drive
Brentwood
Essex
CM13 3AT
01277260000

Full Text: Unsound: (i) not consistent with national policy (ii) not effective (not deliverable/not flexible) (iii) not justified

(1) PPS 3 requires that the local planning authority demonstrate an up to date 5 year supply of deliverable sites. Para 52 confirms the Government's objective to ensure that the planning system delivers a flexible, responsive supply of land and requires local planning authorities to develop policies and implementation strategies to ensure sufficient, suitable land is available to achieve their housing and previously developed land delivery objectives. Paragraph 54 gives clear guidance on the assessment of sites to deliver housing in the first 5 years.

We do not consider that there is enough clear evidence to demonstrate that the council will be able to meet this requirement and provide an adequate 5 year land supply.

The RSS identified build rate for plan period is 250 pa.

For a number of years the rate of delivery of new dwellings in Rochford has been well below that now required to meet the minimum requirements of the RSS. From April 2001 to March 2006, a total of 810 units were built at 160 units per annum (pa). For this period, Rochford had one of the lowest build rates in Essex. Whilst there was an increase in build rates for 2006/2007, this would appear to be the exception to the rule, and we would contest that without an increase in site availability/allocated sites, Rochford will continue to deliver below the required rates. In fact the housing trajectory shown on page 55 of the Core Strategy indicates that between 2008/2009 and 2012/13 1191 units will be built, equating to approx 238 pa.

Whilst the projected build rate for 2010 to 2015 appears to meet the 250 pa requirement, we seriously doubt that this level of delivery anticipated can be achieved relying upon the brownfield sites identified to help meet this target.

Referring to the SHLAA summary of sites and the table at page 39/40 of the Core Strategy, it is clear that the council rely heavily on brownfield sites which do not have the benefit of planning permission, and are either subject to pre-application discussions or identified as a possible/appropriate site for development in the SHLAA. There must be serious doubt that many of these sites will come forward for development within the timescales identified. It is usual to expect a number of brownfield sites to take time to deliver due to various deliverability constraints and/or viability issues, and there is often lengthy lead in times before planning permission is granted and construction commenced/completed.

For example, we note that for the years 2010/11 to 2011/12, 250 units are planned for the Stambridge Mills site, but we are aware that this site has flood risk issues which need resolving and also poor access which again may require solutions which take time to deliver. We doubt that the site will be delivered to the timescales identified.

We argue therefore that some of the greenfield sites identified for 2015 onwards should already be brought forward to ensure national/regional targets or annual targets are met. Whilst we recognize that the council "will maintain a flexible approach with regards to the timing of the release of land for residential development to ensure a five year supply" (Policy H2, see our separate representations), we consider that there is enough evidence at this time to bring forward one or more of the Greenfield sites now.

This would not, we believe, prejudice the aim of developing brownfield/previously developed land as such land will come forward as a result of interest in such sites/the market, notwithstanding the development of Greenfield sites.

The council is behind in terms of delivery rates specified in the East of England Plan (RSS), and there is therefore a need to speed up delivery now. This should in itself justify the need for Strategic Greenfield sites to come forward early in the plan period. We take the view that it will be difficult to achieve the annual build rate for the relevant 5 year period, without the release of a (or several) strategic greenfield development site(s).

We can bring forward the site we promote, land north of London Road, Rayleigh, earlier than the identified 2015. We cover this matter further in our representations to Policy H2.

(2) Furthermore, we consider that the amount of brownfield land identified as coming forward within the (overall) plan period is extremely optimistic.

We have serious doubts for example that the Rawreth Industrial Estate (identified for 220 units 2017/18 to 2019/20) will come forward for residential development. As we understand it, there are a considerable number of different

Core Strategy Submission Document

16204 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

landownerships involved. There are also many different tenants/occupiers. This suggests that land assembly, to enable a comprehensive development (the only way, we suggest, that development of this estate could take place) will be more than problematic and will take a considerable number of years to achieve (if at all). Even if other/an alternative site/land is identified for the possible relocation of existing occupiers, there is no guarantee that occupiers would want to relocate, with the possibility of incurring greater costs in new premises. Occupiers may be happy to stay where they are unless they wish to expand or upgrade premises.

We also think that there could be serious contamination issues at this site, further affecting delivery of a housing scheme/affecting development costs.

We are not aware that the council would have the will or the finances to undertake compulsory purchase to enable the sites redevelopment.

We are not aware that the council has contacted all or any of these landowners or occupiers to ascertain the potential to assemble land and deliver the redevelopment of this site.

Whilst we understand that the site gives rise to amenity nuisance to local residents, we are surprised that the council want to redevelop a successful commercial site that provides many jobs. The Employment Land Study (Oct 08) clearly states that buildings on this site are generally of good quality and that there is no vacant land or buildings at the time of survey. This indicates much success, and its proposed redevelopment could therefore result in the loss of important jobs.

This is just one example where we believe delivery of housing numbers on brownfield sites will be affected by land assembly or other constraints. The proposed redevelopment of the Hockley Trading Centre (Eldon Way) 150 units we also suggest will take a longer time period to deliver than the trajectory suggests (2019/20 to 2020/21), being part of a wider town centre development scheme with land assembly and infrastructure issues involved.

The council needs to demonstrate the deliverability of those housing sites identified as either local plan allocations or brownfield sites identified in the SHLAA.

We argue therefore that as well as bringing one or more of the identified Greenfield sites forward, one or more of the Greenfield sites needs to provide a greater number of housing units than that allocated in policy H2, to ensure that required housing targets are met. We consider that the land we promote, north of London Road, Rayleigh, can accommodate a greater number of housing units than that specified in Policy H2. We cover this matter further in our representations to policy H2.

(3) Finally we refer to the infrastructure requirements set out in Appendix H1, and referred to in this policy.

It should be made explicit that the level of infrastructure to be provided with a development will be reasonably related to the impact of that development. Circular 5/05 and the emerging/published DCLG guidance on the use of CIL, makes it clear that new developments/contributions from new development can not be used to resolve existing deficiencies (only, proportionally, those deficiencies made worse by new development).

Whilst some infrastructure requirements will be required to adhere to other council policies, it should be made clear that the majority of infrastructure requirements for each development site listed in Appendix H1 will be specified in future master plans/planning permissions when the precise impacts of the development are understood and assessed. It would be inappropriate to specify infrastructure requirements at this time when the precise scale and nature of development is not determined.

Summary:

1. The policy should demonstrate how this will be achieved. The earlier release of one or more of the 2015-2021 Greenfield sites should be brought forward within Policy H2 to ensure that the 5 year supply can be achieved.
2. (a) one or more of the Greenfield sites identified in Policy H2 be brought forward from 2015 (b) the number of units for those Greenfield sites be increased to make up for what we consider will be a shortfall in the delivery of housing on brownfield sites.

Change to Plan

Changes necessary to make Policy H1 sound

1. Clear reference should be made within the policy to the need to achieve a 5 year housing land supply. The policy should demonstrate how this will be achieved. The earlier release of one or more of the 2015-2021 Greenfield sites should be brought forward within Policy H2 to ensure that the 5 year supply can be achieved.
2. Bearing in mind our comments on housing delivery (rates), and the over reliance placed upon and constraints associated with the development of identified brownfield sites, (a) one or more of the Greenfield sites identified in Policy H2 be brought forward from 2015 (b) the number of units for those Greenfield sites be increased to make up for what we consider will be a shortfall in the delivery of housing on brownfield sites.

Specifically, with no clear demonstration that the redevelopment of the Rawreth Industrial Estate can be delivered within the plan period, we contest that it should be dropped from this policy (and Policy ED3). Whether it is dropped from these policies, or retained, an appropriate strategy would be to allocate additional housing numbers on the land we promote, north of London Road, Rayleigh, to cover the possibility of failing to deliver housing on the Rawreth Lane site. We

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O - 16204 - 8650 - Policy H1 - The efficient use of land for housing - ii, iii

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believe that the land we promote can accommodate a greater number of housing units than that specified in Policy H2. We cover this matter further in our representations to Policy H2.

3. It should be made explicit that the level of infrastructure to be provided with a development will be reasonably related to the impact of that development and that infrastructure requirements for each site listed in Appendix H1 will be specified in future master plans/planning permissions when the precise impacts of the development are understood and assessed.

Appear at exam? Yes

Soundness Tests ii, iii

Core Strategy Submission Document

S - 16205 - 8650 - Policy H1 - The efficient use of land for housing - None

16205 Support

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Countryside Properties (Southern) Ltd (Mr Steve Price) [8650] **Agent:** N/A

Countryside Properties (Southern) Ltd
Countryside House
The Drive
Brentwood
Essex
CM13 3AT
01277260000

Full Text: We agree with the aim within this policy in terms of avoiding "town cramming" or over intensifying limited infill or inappropriate brownfield sites, where harmful to the character of the area.

Summary: We agree with the aim within this policy in terms of avoiding "town cramming" or over intensifying limited infill or inappropriate brownfield sites, where harmful to the character of the area.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16211 - 9935 - Policy H1 - The efficient use of land for housing - i, iii

16211 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: CPREssex (Mrs Valerie Stanton) [9935]

Agent: N/A

CPREssex
Hillcrest Farm
Lark Hil Road
Canewdon
SS4 3RZ
Essex

Full Text: Stambridge Mill - CPREssex made a previous objection to the use of this site for residential development. The site is detached from any existing settlement and with no public transport or other services would not reduce car-dependency.

Any development would require flood protection to comply with PPS25's exceptions test.

Summary: Stambridge Mill - CPREssex made a previous objection to the use of this site for residential development. The site is detached from any existing settlement and with no public transport or other services would not reduce car-dependency.

Any development would require flood protection to comply with PPS25's exceptions test.

Change to Plan The inclusion of Stambridge Mill with this Policy is unsound. Residential development is not an appropriate use for this site for the reason set out above.

Such a use would not be consistent with other parts of the Core Strategy that try to keep new housing development within or adjacent to existing settlements.

A more suitable use for this site would be employment.

Appear at exam? No

Soundness Tests i, iii

Core Strategy Submission Document

S - 16242 - 8650 - Policy H1 - The efficient use of land for housing - None

16242 Support

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Countryside Properties (Southern) Ltd (Mr Steve Price) [8650] **Agent:** N/A

Countryside Properties (Southern) Ltd
Countryside House
The Drive
Brentwood
Essex
CM13 3AT
01277260000

Full Text: General Amendments Sought

We consider that this policy should detail the spatial strategy for Rochford. It should include a table that provides a breakdown regarding housing delivery, akin to the table on pages 39/40 of the Core Strategy.

Summary: General Amendments Sought

We consider that this policy should detail the spatial strategy for Rochford. It should include a table that provides a breakdown regarding housing delivery, akin to the table on pages 39/40 of the Core Strategy.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16281 - 12098 - Policy H1 - The efficient use of land for housing - i

16281 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Mr David Dare [12098]

1, Woodstock Crescent
Hockley Essex
SS5 4XG
UK
01702 205813

Agent: N/A

Full Text: Highway & Traffic Implications

1. Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;

* (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

* EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

3. RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local

Core Strategy Submission Document

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CHAPTER 4 Policy H1 - The efficient use of land for housing

Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

Summary:

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:

* The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

* The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

Previous consultations ignored by RDC:

The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

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CHAPTER 4 Policy H1 - The efficient use of land for housing

Thus the proposals are not founded on a robust and credible evidence base and are unsound

7. RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

* The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

* the Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!

* The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Summary:

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

the Foundry Industrial Estate has never even been previously mentioned;

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Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

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10. THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food

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CHAPTER 4 Policy H1 - The efficient use of land for housing

shopping expenditure.

2) (10.28) "There is no immediate capacity for additional floor space."

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Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16291 - 12098 - Policy H1 - The efficient use of land for housing - i

16291 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Mr David Dare [12098]

1, Woodstock Crescent
Hockley Essex
SS5 4XG
UK
01702 205813

Agent: N/A

Full Text: Highway & Traffic Implications

1. Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

□

The site selected for the new industrial estate also contravenes PPS4 which states;

* (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

* EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

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Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

3. RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other

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16291 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

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4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

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* The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

* The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

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Core Strategy Submission Document

16291 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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16291 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16293 - 12098 - Policy H1 - The efficient use of land for housing - i

16293 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Mr David Dare [12098]

1, Woodstock Crescent
Hockley Essex
SS5 4XG
UK
01702 205813

Agent: N/A

Full Text: Highway & Traffic Implications

1. Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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The site selected for the new industrial estate also contravenes PPS4 which states;

* (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

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Core Strategy Submission Document

16293 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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Core Strategy Submission Document

16293 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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Core Strategy Submission Document

16293 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16296 - 12098 - Policy H1 - The efficient use of land for housing - i

16296 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Mr David Dare [12098]

1, Woodstock Crescent
Hockley Essex
SS5 4XG
UK
01702 205813

Agent: N/A

Full Text: Highway & Traffic Implications

1. Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;

* (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

* EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

3. RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local

Core Strategy Submission Document

16296 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

Summary:

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:

* The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

* The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

Previous consultations ignored by RDC:

The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Core Strategy Submission Document

16296 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Thus the proposals are not founded on a robust and credible evidence base and are unsound

7. RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

* The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

* the Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!

* The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Summary:

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

the Foundry Industrial Estate has never even been previously mentioned;

The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

9. PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

10. THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food

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16296 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

shopping expenditure.

2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's

existing strengths, rather than retail expansion"

4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16299 - 14206 - Policy H1 - The efficient use of land for housing - i

16299 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Mr D Himsley [14206]

4 Brackendale Close
Hockley
Essex
SS5 5AP

Agent: N/A

Full Text: Please find the following objections: -

10 off Unsound Reasons.
1. Highway and Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

3. RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:

The Hockley Parish Plan (dated 2007). The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

7. RDC not consulted on proposals to relocate the Eldon Way and Foundry Industrial Estates

EW; CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" absolutely no consultation on concept of moving EW businesses entirely

FIE; has never even been previously mentioned in any plan version; CS states omission was due to typing error!

Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus proposals are not founded on a robust and credible evidence base and are unsound.

8. The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

Core Strategy Submission Document

16299 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound

9. PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies"

Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which

does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise

residents how such changes will be made and the strategy is unsound.

10. The CS misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The CS states "The R&LS states Hockley has great potential and has a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) "does not lend itself to a food store capable of retaining a significant proportion of main food shopping expenditure.
- 2) "there is no immediate capacity for additional floor space."
- 3) "recommend that focus be maintained on developing Hockley's existing strengths."
- 4) " the Council may wish to consider reclassifying Hockley from a town center, to a district center".

Summary:

1. Highway and Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16309 - 14206 - Policy H1 - The efficient use of land for housing - i

16309 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Mr D Himsley [14206]

4 Brackendale Close
Hockley
Essex
SS5 5AP

Agent: N/A

Full Text: Please find the following objections: -

10 off Unsound Reasons.
1. Highway and Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

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It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:
The Hockley Parish Plan (dated 2007). The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

7. RDC not consulted on proposals to relocate the Eldon Way and Foundry Industrial Estates

EW; CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" absolutely no consultation on concept of moving EW businesses entirely

FIE; has never even been previously mentioned in any plan version; CS states omission was due to typing error!

Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus proposals are not founded on a robust and credible evidence base and are unsound.

8. The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

Core Strategy Submission Document

16309 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound

9. PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies"

Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which

does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise

residents how such changes will be made and the strategy is unsound.

10. The CS misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The CS states "The R&LS states Hockley has great potential and has a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) "does not lend itself to a food store capable of retaining a significant proportion of main food shopping expenditure.
- 2) "there is no immediate capacity for additional floor space."
- 3) "recommend that focus be maintained on developing Hockley's existing strengths."
- 4) " the Council may wish to consider reclassifying Hockley from a town center, to a district center".

Summary:

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Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

16311 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Mr D Himsley [14206]

4 Brackendale Close
Hockley
Essex
SS5 5AP

Agent: N/A

Full Text: Please find the following objections: -

10 off Unsound Reasons.
1. Highway and Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

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It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

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The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

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6. Previous consultations ignored by RDC:
The Hockley Parish Plan (dated 2007). The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

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Core Strategy Submission Document

16311 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound

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Summary:

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There are also inconsistencies between the Core Strategy & HAAP.

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Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16315 - 14206 - Policy H1 - The efficient use of land for housing - i

16315 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Mr D Himsley [14206]

4 Brackendale Close
Hockley
Essex
SS5 5AP

Agent: N/A

Full Text: Please find the following objections: -

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1. Highway and Traffic Implications

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7. RDC not consulted on proposals to relocate the Eldon Way and Foundry Industrial Estates

EW; CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" absolutely no consultation on concept of moving EW businesses entirely

FIE; has never even been previously mentioned in any plan version; CS states omission was due to typing error!

Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus proposals are not founded on a robust and credible evidence base and are unsound.

8. The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

Core Strategy Submission Document

16315 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound

9. PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies"

Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which

does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise

residents how such changes will be made and the strategy is unsound.

10. The CS misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The CS states "The R&LS states Hockley has great potential and has a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) "does not lend itself to a food store capable of retaining a significant proportion of main food shopping expenditure.
- 2) "there is no immediate capacity for additional floor space."
- 3) "recommend that focus be maintained on developing Hockley's existing strengths."
- 4) " the Council may wish to consider reclassifying Hockley from a town center, to a district center".

Summary:

10. The CS misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The CS states "The R&LS states Hockley has great potential and has a need for additional convenience floorspace".

Whereas, the R&LS actually states:

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- 2) "there is no immediate capacity for additional floor space."
- 3) "recommend that focus be maintained on developing Hockley's existing strengths."
- 4) " the Council may wish to consider reclassifying Hockley from a town center, to a district center".

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16343 - 8267 - Policy H1 - The efficient use of land for housing - ii, iii

16343 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Aber Ltd [8267]

Aber Ltd
C/o Agent

Agent: Colliers CRE (Mr S Chapman) [8266]

Colliers CRE
9 Marylebone Lane
London
W1U 1HL
020 7344 6533

Full Text:

Whilst, we agree with the general locations and phasing of residential properties over the plan period, however, in light of the current economic conditions and the need to maintain an adequate five year supply; the policy needs to adopt a flexible approach with regards the timing and release of land for residential development.

This Policy advises that it will prioritise brownfield development, through sites identified in the Strategic Housing Land Availability Assessment (SHLAA). However, the main sources for potential housing sites within the urban areas, including employment sites, schools, redevelopment of existing residential sites (eg development of garage blocks), and areas of open space. There is a concern that unless appropriate consideration is not given to the development of these sites, this approach could result in the loss of valuable employment sites and amenity space and/or inappropriate 'backland' development, which would have a detrimental impact upon the overall environmental quality of the area and the living conditions of the residents. Furthermore, if sites are developed with a higher proportion of family housing this will reduce the overall density.

Since the Preferred Option document was published the Council have introduced the four industrial sites that could be redeveloped, for alternative appropriate uses (including residential). It then goes on to state that alternative employment locations will need to be identified in appropriate locations, which due to the shortage of sites in the existing urban areas would need to be in the Green Belt.

In order to ensure that a co-ordinated approach is taken to the release of Green Belt land, the requirements for both employment and housing land should be considered together. The idea of not releasing land for residential and then releasing it for employment purposes is a contradiction, as it still requires the release of Green Belt.

In terms of the site at Stambridge Mill, this is located in an area which has a high risk of flooding. The policy advises that in order to redevelop this site it would be necessary to satisfy the PPS25 exceptions test.

However, in order to manage risk, PPS25 would only permit development in areas of flood risk when there are no reasonably available sites in areas of lower flood risk and the benefits of the development outweigh the risks from flooding. Furthermore, the Exception Test should be applied by decision-makers only after the Sequential Test has been applied.

In respect of Stambridge Mill this site would fail to meet the requirements of sequential test as more sequentially preferable sites (within Zone 1), have been identified as part of the Core Strategy. The allocation of this site would also be contrary the fourth bullet of paragraph 4.19, which advises that development will directed to the most sustainable locations on the edge of settlements, having regard to amongst other things: the potential to avoid areas of constraint, such as areas at risk of flooding.

In order to meet the number of jobs required in the RSS, additional employment sites will be required. The Employment Land Study recommends that any de-allocations of employment land be compensated for by the allocation of 18 hectares of new employment sites. As the supply of employment land within the District is tight, this will require the release of Green Belt land.

Reword Policy as follows:

First Paragraph - unaltered

Second Paragraph - reword as follows:

'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. Consideration should also be given to the creation of balanced, well-designed mix of housing, which have been provided at a range of densities; as in every instance it may not be appropriate to maximise the density of a site due to the site characteristics and/or the need to provide a larger proportion of family housing'.

Third Paragraph - reword as follows:

'The Council will seek the redevelopment of Rawreth Lane Industrial Estate, Eldon Way/Foundary Industrial Estate and Star Lane Industrial Estate, for appropriate alternative uses, including residential development and replacement employment uses'.

Fourth Paragraph - delete

Core Strategy Submission Document

16343 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Remaining paragraphs of policy unaltered

Summary:

Whilst, we agree with the general locations and phasing of residential properties over the plan period, however, in light of the current economic conditions and the need to maintain an adequate five year supply; the policy needs to adopt a flexible approach with regards the timing and release of land for residential development.

This Policy advises that it will prioritise brownfield development, through sites identified in the Strategic Housing Land Availability Assessment (SHLAA). However, the main sources for potential housing sites within the urban areas, including employment sites, schools, redevelopment of existing residential sites (eg development of garage blocks), and areas of open space. There is a concern that unless appropriate consideration is not given to the development of these sites, this approach could result in the loss of valuable employment sites and amenity space and/or inappropriate 'backland' development, which would have a detrimental impact upon the overall environmental quality of the area and the living conditions of the residents. Furthermore, if sites are developed with a higher proportion of family housing this will reduce the overall density.

Since the Preferred Option document was published the Council have introduced the four industrial sites that could be redeveloped, for alternative appropriate uses (including residential). It then goes on to state that alternative employment locations will need to be identified in appropriate locations, which due to the shortage of sites in the existing urban areas would need to be in the Green Belt.

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However, in order to manage risk, PPS25 would only permit development in areas of flood risk when there are no reasonably available sites in areas of lower flood risk and the benefits of the development outweigh the risks from flooding. Furthermore, the Exception Test should be applied by decision-makers only after the Sequential Test has been applied.

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In order to meet the number of jobs required in the RSS, additional employment sites will be required. The Employment Land Study recommends that any de-allocations of employment land be compensated for by the allocation of 18 hectares of new employment sites. As the supply of employment land within the District is tight, this will require the release of Green Belt land.

Change to Plan

Appear at exam?	No	Soundness Tests	ii, iii
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Core Strategy Submission Document

16437 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Barbara Havey [14218]

71 Main Road
Hockley
Essex
SS5 4RG

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.
â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound
RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is

Core Strategy Submission Document

16437 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

Summary:

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

Previous consultations ignored by RDC:

â€¢ The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

â€¢ The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

Previous consultations ignored by RDC:

The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

â€¢ The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

â€¢ The Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!

â€¢ The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Summary:

Core Strategy Submission Document

16437 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates
â€¢ The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely
â€¢ the Foundry Industrial Estate has never even been previously mentioned;
â€¢ The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.
 - 2) (10.28) "There is no immediate capacity for additional floor space."
 - 3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion"
 - 4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".
- The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Summary:

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and

Core Strategy Submission Document

O - 16437 - 14218 - Policy H1 - The efficient use of land for housing - iii

16437 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

Change to Plan

Appear at exam?	Not Specified	Soundness Tests	iii
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Core Strategy Submission Document

O - 16447 - 14218 - Policy H1 - The efficient use of land for housing - i

16447 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Barbara Havey [14218]

71 Main Road
Hockley
Essex
SS5 4RG

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.
â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

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The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is

Core Strategy Submission Document

16447 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

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No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

Summary:

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

Previous consultations ignored by RDC:

â€¢ The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

â€¢ The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

Previous consultations ignored by RDC:

The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

â€¢ The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

â€¢ the Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!

â€¢ The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Summary:

Core Strategy Submission Document

16447 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates
â€¢ The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely
â€¢ the Foundry Industrial Estate has never even been previously mentioned;
â€¢ The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

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Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

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Summary:

Summary:

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates
â€¢ The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW

Core Strategy Submission Document

O - 16447 - 14218 - Policy H1 - The efficient use of land for housing - i

16447 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

businesses entirely

â€¢ the Foundry Industrial Estate has never even been previously mentioned;

â€¢ The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16449 - 14218 - Policy H1 - The efficient use of land for housing - i

16449 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Barbara Havey [14218]

71 Main Road
Hockley
Essex
SS5 4RG

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.
â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is

Core Strategy Submission Document

16449 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

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â€¢ The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

â€¢ The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

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Core Strategy Submission Document

16449 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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Core Strategy Submission Document

O - 16449 - 14218 - Policy H1 - The efficient use of land for housing - i

16449 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16452 - 14218 - Policy H1 - The efficient use of land for housing - i

16452 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Barbara Havey [14218]

71 Main Road
Hockley
Essex
SS5 4RG

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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Summary:

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Core Strategy Submission Document

16452 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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Core Strategy Submission Document

16452 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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- The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

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Core Strategy Submission Document

O - 16452 - 14218 - Policy H1 - The efficient use of land for housing - i

16452 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16457 - 7507 - Policy H1 - The efficient use of land for housing - ii

16457 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Mr S Welsh [7507]

Hanover Land Trust
35 Castle Road
Rayleigh
Essex
SS6 7QD

Agent: N/A

Full Text: We consider the DPD is potentially unsound depending on the final selection of specific sites or site in South West Hullbridge.

Please see attached statements 1, 2, 3 and 4 evidential statement.

The precise wording should correlate to the proposal of the attached statements, although the issue may be resolved by publication of the allocations development plan document.

Oral participation will depend on whether the proposed site is included in the allocation development plan document for specific sites for future development, if the proposed site is included oral participation will not be required or necessary.

Summary: We consider the DPD is potentially unsound depending on the final selection of specific sites or site in South West Hullbridge.

Please see attached statements 1, 2, 3 and 4 evidential statement.

Change to Plan The precise wording should correlate to the proposal of the attached statements, although the issue may be resolved by publication of the allocations development plan document.

Appear at exam? Yes **Soundness Tests** ii

Core Strategy Submission Document

O - 16479 - 8324 - Policy H1 - The efficient use of land for housing - i, ii, iii

16479 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Mr J Needs & Aston Unit Trust [8324]

C/o Sellwood Planning
Stoughton Cross House
Stoughton Cross
Wedmore
Somerset
BS28 4QP

Agent: Sellwood Planning (Mr R M Sellwood) [5054]

Sellwood Planning
Stoughton Cross House
Stoughton Cross
Wedmore
Somerset
BS28 4QP

Full Text:

As the first policy in the Core Strategy, the policy fails to set out a robust and flexible strategy to meet the minimum dwelling requirements as set out in the RSS. There is no contingency strategy if

- SHLAA sites fail to come forward as expected
- Policy ED4 sites fail to come forward as expected
- the broad greenfield locations set out in Policy H2 fail to come forward as expected.

The policy should provide guidance on how the Core Strategy would react if dwelling completions fall short of expectations, if dwelling completions exceed expectations or the regional housing total changed.

At present, Policy H1 simply assumes that each category of land supply will occur and the greenfield residual will be allocated as set out in Policy H2 and Policy H3.

Whilst it is appropriate for the Council to set out its priority order for the components of land supply, the final tier of greenfield sites should be specified as a flexible figure necessary to meet at least the minimum RSS figure. The policy should also specify that the distribution of greenfield sites should reflect the settlement strategy of the Core Strategy. Other representations on behalf of the Aston Unit Trust and Mr J Needs have suggested the creation of a new Policy H* which sets out the settlement strategy. By cross referencing with the new Policy H*, the Core Strategy would provide guidance on the priority areas of search for additional greenfield sites.

Revise Policy H1 as follows

"The Core Strategy will enable the delivery of at least the minimum housing requirements of the East of England Plan and will ensure there is an adequate supply of land over at least a 15 year period.

The components of land supply in priority order are

- previously developed land within settlements as identified by the SHLAA
- the redevelopment of the employment sites set out in Policy ED3
- greenfield land releases distributed in accordance with the settlement hierarchy (Policy H*) and set out in Policies H2 and H3."

It is considered that our participation at the oral part of the public examination would assist the Inspector for two main reasons

- Sellwood Planning has a detailed knowledge of the Rochford area, appeared at the last Local Plan Inquiry and was a participant at the RSS public examination. This direct knowledge of the local area and the statutory Development Plan may be of assistance to the Inspector

- Sellwood Planning has experience in promoting major schemes through Core Strategies (eg. 7,000 dwellings in Ashford, 5,750 dwellings in Dover, 2,500 dwellings in Horsham and 1,200 dwellings in Newmarket) and the emerging body of evidence of what constitutes a sound Core Strategy and what is unsound. Our experience indicates that, in a number of respects, the submitted Core Strategy is unsound in its present form.

Summary:

As the first policy in the Core Strategy, the policy fails to set out a robust and flexible strategy to meet the minimum dwelling requirements as set out in the RSS. There is no contingency strategy if

- SHLAA sites fail to come forward as expected
- Policy ED4 sites fail to come forward as expected
- the broad greenfield locations set out in Policy H2 fail to come forward as expected.

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Core Strategy Submission Document

O - 16479 - 8324 - Policy H1 - The efficient use of land for housing - i, ii, iii

16479 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

set out in Policy H2 and Policy H3.

Whilst it is appropriate for the Council to set out its priority order for the components of land supply, the final tier of greenfield sites should be specified as a flexible figure necessary to meet at least the minimum RSS figure. The policy should also specify that the distribution of greenfield sites should reflect the settlement strategy of the Core Strategy. Other representations on behalf of the Aston Unit Trust and Mr J Needs have suggested the creation of a new Policy H* which sets out the settlement strategy. By cross referencing with the new Policy H*, the Core Strategy would provide guidance on the priority areas of search for additional greenfield sites.

Change to Plan

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- previously developed land within settlements as identified by the SHLAA
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- greenfield land releases distributed in accordance with the settlement hierarchy (Policy H*) and set out in Policies H2 and H3."

Appear at exam? Yes **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16484 - 9646 - Policy H1 - The efficient use of land for housing - i

16484 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Mrs Margaret Christian [9646]

41 Westminster Drive
Hockley
Essex
SS5 4XD
01702 204320

Agent: N/A

Full Text: Please find enclosed my objection to the Core Strategy Submission DPD. Please kindly acknowledge receipt of this objection and duly register it.

Objections to RDC's Core Strategy Submission DPD

Reason Unsound

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus service are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

3. RCD are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

Core Strategy Submission Document

16484 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs not, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. Thus it is unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of address the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:

The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

7. RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

The Foundry Industrial Estates has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy acknowledges this omission was due to a typing error!

The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing HAAP consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy or Hockley Area Action Plan (HAAP) defines its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

9. PPS12, 4.6, states that Cores Strategies show be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which do not indicate how such applications will be handled and does not comply with

Core Strategy Submission Document

16484 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

10. The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.

2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion".

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The Core Strategy is inaccurate, misleading and unsound.

Summary:

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

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The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

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It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16492 - 9646 - Policy H1 - The efficient use of land for housing - i

16492 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Mrs Margaret Christian [9646]

Agent: N/A

41 Westminster Drive
Hockley
Essex
SS5 4XD
01702 204320

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Core Strategy Submission Document

16492 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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Core Strategy Submission Document

16492 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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Summary:

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Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16494 - 9646 - Policy H1 - The efficient use of land for housing - i

16494 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Mrs Margaret Christian [9646]

41 Westminster Drive
Hockley
Essex
SS5 4XD
01702 204320

Agent: N/A

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Core Strategy Submission Document

16494 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

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The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

7. RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

The Foundry Industrial Estates has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy acknowledges this omission was due to a typing error!

The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing HAAP consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy or Hockley Area Action Plan (HAAP) defines its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

9. PPS12, 4.6, states that Cores Strategies show be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which do not indicate how such applications will be handled and does not comply with

Core Strategy Submission Document

16494 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

10. The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

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The Core Strategy is inaccurate, misleading and unsound.

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Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16497 - 9646 - Policy H1 - The efficient use of land for housing - i

16497 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Mrs Margaret Christian [9646]

41 Westminster Drive
Hockley
Essex
SS5 4XD
01702 204320

Agent: N/A

Full Text: Please find enclosed my objection to the Core Strategy Submission DPD. Please kindly acknowledge receipt of this objection and duly register it.

Objections to RDC's Core Strategy Submission DPD

Reason Unsound

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus service are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

3. RCD are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

Core Strategy Submission Document

16497 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs not, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. Thus it is unclear if use of Standard Charges is financially viable.

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Core Strategy Submission Document

16497 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

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The Core Strategy is inaccurate, misleading and unsound.

Summary:

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Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16520 - 10081 - Policy H1 - The efficient use of land for housing - i

16520 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Mr David Sullivan [10081]

123 Burges Road
Thrope Bay

SS1 3JL

Agent: Whirledge & Nott (Ms K Jennings) [5094]

Whirledge & Nott
The Black Barn
Lubards Lodge Farm
Hullbridge Road
Rayleigh
Essex

SS6 9QG

Full Text:

We are supportive that the council will consider limiting infilling provided it relates well to the existing street plan, density and character of the locality. However we feel it is Unsound in that there has not been more consideration of redeveloping the plotland areas to the north of Rawreth Lane or south of London Road. Examples of infill opportunities outside of residential areas should be detailed in a separate policy for the avoidance of doubt and the protection of the Green Belt boundary in the longer term. Areas of plotland which already have residential development within the Green Belt should be considered for this type of development.

Infill sites within existing residential development in the Green Belt and could be identified as acceptable locations for development within the allocations document but a policy referring to their appropriateness for development should be included within the Core Strategy.

No, I do not wish to participate at the oral examination

Summary:

6. We are supportive that the council will consider limiting infilling provided it relates well to the existing street plan, density and character of the locality. However we feel it is Unsound in that there has not been more consideration of redeveloping the plotland areas to the north of Rawreth Lane or south of London Road. Examples of infill opportunities outside of residential areas should be detailed in a separate policy for the avoidance of doubt and the protection of the Green Belt boundary in the longer term. Areas of plotland which already have residential development within the Green Belt should be considered for this type of development.

Change to Plan

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Appear at exam? No

Soundness Tests i

Core Strategy Submission Document

O - 16524 - 13921 - Policy H1 - The efficient use of land for housing - i

16524 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Ms H Rozga [13921]

56A Aldermans Hill
Hockley
Essex
SS5 4RW

Agent: N/A

Full Text:

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus service are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

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The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

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Core Strategy Submission Document

16524 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts.

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Core Strategy Submission Document

16524 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

the Core Strategy acknowledges this omission was due to a typing error!

The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

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Summary:

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Summary

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

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Core Strategy Submission Document

16524 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) "the Council may wish to consider reclassifying Hockley from a town centre to a district centre.

Summary:

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Change to Plan

Appear at exam? No

Soundness Tests i

Core Strategy Submission Document

O - 16534 - 13921 - Policy H1 - The efficient use of land for housing - i

16534 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Ms H Rozga [13921]

56A Aldermans Hill
Hockley
Essex
SS5 4RW

Agent: N/A

Full Text:

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Core Strategy Submission Document

16534 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Summary:

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The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. Thus it is unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of address the railway bridge bottleneck will be significant but is not mentioned.

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The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

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The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely.

The Foundry Industrial Estates has never even been previously mentioned in any plan version; A recent amendment to

Core Strategy Submission Document

16534 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing HAAP consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy or Hockley Area Action Plan (HAAP) defines its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

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10. The Core Strategy misrepresent the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.

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Core Strategy Submission Document

16534 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Core Strategy is inaccurate, misleading and unsound.

Summary:

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Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16536 - 13921 - Policy H1 - The efficient use of land for housing - i

16536 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Ms H Rozga [13921]

56A Aldermans Hill
Hockley
Essex
SS5 4RW

Agent: N/A

Full Text:

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Core Strategy Submission Document

16536 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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CHAPTER 4 Policy H1 - The efficient use of land for housing

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Core Strategy Submission Document

16536 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16539 - 13921 - Policy H1 - The efficient use of land for housing - i

16539 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Ms H Rozga [13921]

56A Aldermans Hill
Hockley
Essex
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Agent: N/A

Full Text:

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Core Strategy Submission Document

16539 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost to address the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

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6. Previous consultations ignored by RDC:

The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

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7. RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates.

The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely.

Core Strategy Submission Document

16539 Object

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The Foundry Industrial Estates has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy acknowledges this omission was due to a typing error!

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8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing HAAP consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy or Hockley Area Action Plan (HAAP) defines its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

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9. PPS12, 4.6, states that Cores Strategies show be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which do not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

10. The Core Strategy misrepresent the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.

2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion".

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O - 16539 - 13921 - Policy H1 - The efficient use of land for housing - i

16539 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) "the Council may wish to consider reclassifying Hockley from a town centre to a district centre.

Summary:

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Change to Plan

Appear at exam? Not Specified

Soundness Tests i

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O - 16542 - 13667 - Policy H1 - The efficient use of land for housing - i

16542 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: G and S Cooke [13667]

56 Aldermans Hill
Hockley
Essex
SS5 4RW

Agent: N/A

Full Text:

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus service are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

Summary:

Proposals for moving employment to of town locations, at either end of the district, with no existing public transport inks, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

3. RCD are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in

Core Strategy Submission Document

16542 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts.

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Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of address the railway bridge bottleneck will be significant but is not mentioned.

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CHAPTER 4 Policy H1 - The efficient use of land for housing

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The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely.

The Foundry Industrial Estates has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy acknowledges this omission was due to a typing error!

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Summary

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9. PPS12, 4.6, states that Cores Strategies show be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which do not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

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Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.

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O - 16542 - 13667 - Policy H1 - The efficient use of land for housing - i

16542 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion".

4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Core Strategy is inaccurate, misleading and unsound.

Summary:

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Summary: Proposals for moving employment to of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16552 - 13667 - Policy H1 - The efficient use of land for housing - i

16552 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: G and S Cooke [13667]

56 Aldermans Hill
Hockley
Essex
SS5 4RW

Agent: N/A

Full Text:

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus service are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

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The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

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It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

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Core Strategy Submission Document

16552 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

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Core Strategy Submission Document

16552 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary

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The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.

Core Strategy Submission Document

O - 16552 - 13667 - Policy H1 - The efficient use of land for housing - i

16552 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

2) (10.28) "There is no immediate capacity for additional floor space."

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The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) "the Council may wish to consider reclassifying Hockley from a town centre to a district centre.

Summary: RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates.

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Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16554 - 13667 - Policy H1 - The efficient use of land for housing - i

16554 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: G and S Cooke [13667]

56 Aldermans Hill
Hockley
Essex
SS5 4RW

Agent: N/A

Full Text:

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus service are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

Summary:

Proposals for moving employment to of town locations, at either end of the district, with no existing public transport inks, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

3. RCD are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in

Core Strategy Submission Document

16554 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

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RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts.

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4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs not, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. Thus it is unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of address the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

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5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:

The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

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Core Strategy Submission Document

16554 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

7. RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates.

The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely.

The Foundry Industrial Estates has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy acknowledges this omission was due to a typing error!

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The Foundry Industrial Estate has never even been previously mentioned.

The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate.

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing HAAP consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy or Hockley Area Action Plan (HAAP) defines its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

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Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.

Core Strategy Submission Document

16554 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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The Core Strategy is inaccurate, misleading and unsound.

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Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16557 - 13667 - Policy H1 - The efficient use of land for housing - i

16557 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: G and S Cooke [13667]

56 Aldermans Hill
Hockley
Essex
SS5 4RW

Agent: N/A

Full Text:

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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The site selected for the new industrial estate also contravenes PPS4 which states:

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Core Strategy Submission Document

16557 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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Core Strategy Submission Document

16557 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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Core Strategy Submission Document

16557 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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The Core Strategy is inaccurate, misleading and unsound.

Summary:

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Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16575 - 14231 - Policy H1 - The efficient use of land for housing - i

16575 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Heather Wakefield [14231]

Not provided

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

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The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.
â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

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Summary:

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The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

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RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

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The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Core Strategy Submission Document

16575 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Summary:

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PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

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Core Strategy Submission Document

16575 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

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THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.
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Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

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Change to Plan

Core Strategy Submission Document

O - 16575 - 14231 - Policy H1 - The efficient use of land for housing - i

16575 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Appear at exam? Not Specified

Soundness Tests i

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

Core Strategy Submission Document

O - 16585 - 14231 - Policy H1 - The efficient use of land for housing - i

16585 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Heather Wakefield [14231]

Not provided

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighboring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.
â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

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Core Strategy Submission Document

16585 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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Core Strategy Submission Document

16585 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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Core Strategy Submission Document

O - 16585 - 14231 - Policy H1 - The efficient use of land for housing - i

16585 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16587 - 14231 - Policy H1 - The efficient use of land for housing - i

16587 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Heather Wakefield [14231]

Not provided

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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Core Strategy Submission Document

16587 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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Summary:

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Core Strategy Submission Document

16587 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

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THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.
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Core Strategy Submission Document

O - 16587 - 14231 - Policy H1 - The efficient use of land for housing - i

16587 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16590 - 14231 - Policy H1 - The efficient use of land for housing - i

16590 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Heather Wakefield [14231]

Not provided

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighboring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.
â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Core Strategy Submission Document

16590 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

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Previous consultations ignored by RDC:

• The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

• The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

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Core Strategy Submission Document

16590 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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Change to Plan

Core Strategy Submission Document

O - 16590 - 14231 - Policy H1 - The efficient use of land for housing - i

16590 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Appear at exam? Not Specified

Soundness Tests i

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

Core Strategy Submission Document

O - 16593 - 14232 - Policy H1 - The efficient use of land for housing - i

16593 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Roger Wakefield [14232]

Not provided

SS5 4UX

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

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Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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Core Strategy Submission Document

16593 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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Core Strategy Submission Document

16593 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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Change to Plan

Core Strategy Submission Document

O - 16593 - 14232 - Policy H1 - The efficient use of land for housing - i

16593 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Appear at exam? Not Specified

Soundness Tests i

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

Core Strategy Submission Document

O - 16602 - 14232 - Policy H1 - The efficient use of land for housing - i

16602 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Roger Wakefield [14232]

Not provided

SS5 4UX

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighboring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.
â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Core Strategy Submission Document

16602 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

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SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

Previous consultations ignored by RDC:

â€¢ The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

â€¢ The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

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RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

â€¢ The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

â€¢ the Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!

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CHAPTER 4 Policy H1 - The efficient use of land for housing

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Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

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PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.
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Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

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16604 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Roger Wakefield [14232]

Not provided

SS5 4UX

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Full Text:

Highway & Traffic Implications

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Core Strategy Submission Document

16604 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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16604 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16607 - 14232 - Policy H1 - The efficient use of land for housing - i

16607 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Roger Wakefield [14232]

Not provided

SS5 4UX

Agent: N/A

Full Text:

Highway & Traffic Implications

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PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

Summary:

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

Previous consultations ignored by RDC:

• The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

• The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

Previous consultations ignored by RDC:

The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

• The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

• the Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!

• The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Summary:

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

• The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

Core Strategy Submission Document

16607 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

â€¢ the Foundry Industrial Estate has never even been previously mentioned;
â€¢ The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.
 - 2) (10.28) "There is no immediate capacity for additional floor space."
 - 3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion"
 - 4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moveover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".
- The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Summary:

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Change to Plan

Core Strategy Submission Document

O - 16607 - 14232 - Policy H1 - The efficient use of land for housing - i

16607 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Appear at exam? Not Specified

Soundness Tests i

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

Core Strategy Submission Document

O - 16610 - 5219 - Policy H1 - The efficient use of land for housing - i, ii

16610 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Fairview New Homes Ltd [5219]

Fairview New Homes Ltd
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020 83661271

Agent: Planning Potential (Miss G Brickwood) [7549]

Planning Potential
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London
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0207 357 8000

Full Text: Representations on behalf of Fairview New Homes

1. We are instructed by our client, Fairview New Homes, to submit comments on the published Core Strategy Submission Document. For ease specific reference has been made in accordance with the paragraph and policy numbers as contained in the published document. We would like the opportunity to represent our Client at the forthcoming Examination of the Core Strategy DPD and would be grateful for confirmation that this is possible.

2. Fairview New Homes have an interest in a parcel of land to the South West of Rayleigh Town Centre, as indicated on the attached site location plan. This land was previously identified in the Core Strategy Preferred Options documents to provide an urban extension to the south west of Rayleigh. This option has now been withdrawn in the Core Strategy Submission document and it is on this basis these representations are provided to the Council.

3. The Submission Core Strategy has been considered against the requirements set out at Paragraph 4.36 of PPS12 requiring core strategies to be justifiable and effective in order to be found sound, as follows:

Justified:

- i. Founded on a robust and credible evidence base
- ii. The most appropriate strategy when considered against the reasonable alternatives

Effective:

- i. Deliverable - the Core Strategy should show how the vision, objectives and strategy for the area will be delivered and by whom, and when, including who is responsible for implementing different elements of the strategy and when
- ii. Flexible - a strategy is unlikely to be effective if it cannot deal with changing circumstances. Plans should show how they will handle contingencies.
- iii. Able to be monitored - monitoring is essential for an effective strategy and will provide the basis on which the contingency plans within the strategy would be triggered.

4. To summarise our comments, Fairview New Homes strongly object to the Core Strategy as is currently presented on the basis the document is currently unsound for a number of reasons:

â€¢ The lack of robust and credible evidence base

â€¢ Failure to clearly discount reasonable alternatives

â€¢ The effectiveness of the plan is also considered to be flawed and the Council's approach to deliverability and flexibility is questioned.

5. Fundamentally, we question the soundness of the Core Strategy due to the lack of available evidence to support the choices made by the Council. In particular, there is a strong reliance on the findings of the 2009 Strategic Housing Land Availability Assessment (SHLAA) although it is understood this document is not due to be published for consideration alongside the Core Strategy. We, therefore, reserve the right to submit additional comments to the Core Strategy consultation following the publication of the SHLAA.

6. The 2009 SHLAA is clearly listed at Paragraph 1.29 of the submission Core Strategy as one of the evidence base documents the Council have drawn upon when drafting the Core Strategy. The documents listed are all considered to have played an important role in informing the Core Strategy. PPS12 also recognises at Paragraph 4.37 the importance of demonstrating how choices made in the plan are backed up by factual evidence identified in evidence base documents.

7. As a starting point it is important to state it is Fairview New Homes greatest concern there is no background provided within the Core Strategy document, or indeed any of the available evidence base documents, identifying why the Local Planning Authority has chosen to remove some of the sites previously proposed for housing development. In addition, there is also no justification as to why the retained urban extension sites are more suitable than those removed from the draft plan.

8. The following provides specific comments in response to the relevant areas of the Core Strategy.

Housing

9. It is stated at Paragraphs 4.10-4.12 that the Council have adopted a balanced approach when locating new housing between higher tier settlements and lower tier settlements. Although there is no detail provided as to how the Council

16610 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

intend on implementing this balanced approach or how the strategic allocation of housing contributes to the balance required. Our Client cannot support this approach until further detail is understood as to the proportion of housing being allocated to each settlement tier.

10. The proposed distribution of housing development during the plan period does not appear to be proportionately allocated between the various settlement tiers. We would argue that development should be distributed proportionately in line with the size of the settlement in order to benefit for available services and facilities. Rayleigh recognised as having best access to services within the district at Paragraph 2.68 of the Core Strategy. On this basis it is considered the development should primarily be directed to Rayleigh with a proportionate level of housing to the remaining settlements in the District.

Policy H1 - The efficient use of land for housing

11. In general the use of residential extensions to meet the remaining housing requirement that cannot be delivered through the redevelopment of appropriate previously developed land is supported by Fairview New Homes.

12. It is understood there is a need to prioritise use of brownfield land in line with national policy requirements but this needs to be a carefully balanced and realistic approach in identifying appropriate urban extensions to accommodate the majority of the District's housing, as identified in the table at Paragraph 4.6 and later at Paragraph 4.15.

13. Policy H1 sets out that the Council will seek the redevelopment of Rawreth Lane Industrial Estate, Foundry Industrial Estate, Stambridge Mills and Star Lane Industrial Estate. Without sight of the 2009 SHLAA it is not possible to understand whether the Council's choice to release employment land for housing is appropriate and Fairview New Homes cannot, therefore, support this element of Policy H1. This objection is further amplified by the fact additional employment land is required but is yet to be identified.

Policy H2 - Extensions to residential envelopes and phasing

14. The Council's intention to provide a balanced strategy for housing provision is mentioned again at Paragraph 4.18. The comments made at Paragraphs 9 and 10 above are also relevant in this respect.

15. In comparing the Preferred Options Core Strategy Document and Submission Core Strategy Document there is a significant reduction in the number of housing units being provided in urban extensions pre 2015, from 1450 dwellings to 775. From discussions with the Local Planning Authority it is understood the Council are seeking to provide the District's housing requirements by increased development densities. From the evidence available in the Submission Core Strategy and summary of SHLAA sites a number of the sites identified as urban extensions have in fact been allocated a reduced number of dwellings, including the land to the north of London Road, Rayleigh. We would, therefore, consider the approach taken by the Local Planning Authority to provide the required level of housing is untenable and unjustified.

16. In discounting preferred options PPS12 makes clear at Paragraph 4.38 the requirement for Local Planning Authorities to consider and evaluate reasonable alternatives. As set out above, the choices the Council have pursued have not been substantiated and without the consideration of reasonable alternatives the Core Strategy cannot be considered justified and therefore unsound.

17. However, this is our opinion based only on discussions with the Local Planning Authority rather than a thorough evidence base and we will consider the evidence in detail when it become available and provide further comment.

18. Paragraph 4.19 of the draft Core Strategy details the Council's primary factors in determining the location of future urban extensions. It is presumed the Council have assessed each of the proposed urban extension sites against the following criteria and that this information is contained within the SHLAA, although we have not been provided with any evidence of this to assess. It can be demonstrated that the land identified on the attached site location plan meets all of the requirements set out below.

â€¢ The proximity and relationship to existing centres, facilities, services

â€¢ The availability of infrastructure and/or the potential for additional infrastructure to be provided for development in such areas

â€¢ The potential to reduce private car dependency

â€¢ The potential to avoid areas of constraint (such as areas at risk of flooding, sites of ecological importance, public safety zone etc)

â€¢ The historical, agricultural and ecological value of land

â€¢ The impact on highway network (including availability and impact on existing network, as well as potential for improvements to be delivered)

â€¢ The relationship of development locations to the District's area of employment growth

â€¢ The potential to create a defensible Green Belt boundary

â€¢ The avoidance of coalescence with neighbouring settlements

19. In summary, Fairview's land is sustainably located in particularly close proximity to Rayleigh Town Centre and train station. In addition, the location of the land provides a natural extension and rounding of settlement boundary. An extension to Rayleigh in this location offers no opportunity for coalescence with neighbouring settlements nor does it constitute urban sprawl.

Core Strategy Submission Document

16610 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Policy H2 - Extensions to residential envelopes and phasing

20. Although it is stated a flexible approach to the timings of the release of land will be maintain no explanation is provided as to why some sites are considered suitable for development pre 2015 and others post 2015. Paragraph 4.22 elaborates further to state a number of factors have been considered when determining the phasing of strategic housing sites although this information is not clearly available to assess.

21. As stated above the principle of releasing certain areas of greenbelt land is considered the best approach to meeting the Council's housing provision requirements. However, Fairview New Homes object to the omission of the land to the South West of Rayleigh for housing development as previously identified in the Core Strategy Preferred Options document. The site identified on the attached site location plan has been assessed against the Council's criteria, as set out at Paragraph 18 above and each requirement can be met. Without any clear explanation as to why this site has been discounted and the only other strategic housing site identified in Rayleigh is located further away from Rayleigh Town Centre and the associated services and facilities including the train station, Fairview New Homes object to Policy H2.

22. As considered at the outset of these representations the draft Core Strategy cannot be considered robust, and therefore sound, without clear justification and evidence base.

Policy H3 - Extension to residential envelopes post-2021

23. Policy H3 is supported on the basis that the release of greenbelt land is required for housing and this is the most appropriate approach to meet the Council's housing requirements, as set out at Paragraph 21 above.

24. However, it is unclear why some of the sites previously identified for housing development pre 2015 up until 2021 in the Preferred Options Core Strategy document have now been allocated for development post 2021, such as South East Ashingdon. It is stated at Paragraph 4.24 of the Submission Core Strategy document those areas identified for post 2021 development may not be immediately deliverable. However, there is no information available to understand why these sites are now no longer considered suitable for pre 2015 development as they were in December 2008. As a result, Fairview New Homes consider Policy H3 to be unjustified and therefore unsound.

Affordable Housing

25. The acute need for additional affordable housing is recognised at Paragraph 4.30. It is unclear from the draft Core Strategy document exactly how much affordable housing is required in the District in the plan period.

26. However, taking the starting point as set out at Paragraph 4.30 that the Thames Gateway South Essex Strategic Housing Market Assessment requires 131 net additional affordable dwellings per year which constitutes 52% of the District's overall annual housing target. In order to achieve this target using the Council's proposed policy requirement that new housing developments are to provide 35% affordable housing, 375 new dwellings would need to be developed each year. This calculation does not account for those developments with fewer than 15 dwellings which have no requirement to provide affordable housing or developments which cannot viably afford to provide non-market housing.

27. An annual requirement of 250 dwellings is identified at Paragraph 4.2 of the Core Strategy which would leave a significant short fall of affordable housing and act to compound the current situation. The approach taken by the Council ultimately accepts there will always be a shortfall in affordable housing provision and does not seek to redress this. We do not, therefore, consider this to be a robust or justified approach to achieving affordable housing in the District.

28. It is, therefore, considered in order to meet the District's affordable housing requirement additional housing land should be identified in order to ensure a wholesale increase in housing provision to address the Council's shortfall in affordable housing and meet the targets set for the plan period. The most appropriate and effective method by which to secure affordable housing provision is through developing large sites that are viably able to offer affordable housing units.

29. During the consultation of the submission Core Strategy the Council's Housing Strategy (2009) was not available and we reserve the right to make further comment on this document following the publication of this evidence.

The Green Belt

30. It is fully accepted by the Council that the Green Belt boundary is currently too tightly drawn and the release of some Green Belt land is necessary to meet the District's development requirements. However, it needs to be demonstrated that the areas of Green Belt land to be lost are justified and located in the most appropriate area and that areas of release land do not undermine the principle of the Green Belt.

31. It is understood from Paragraph 6.7 of the Submission Core Strategy the Council will seek to examine the degree to which current Green Belt land is helping to achieve the purposes of the Green Belt when considering reallocating land. However, areas of Green Belt are proposed to be reallocated for urban extensions prior to this research being undertaken.

Core Strategy Submission Document

O - 16610 - 5219 - Policy H1 - The efficient use of land for housing - i, ii

16610 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

32. Fairview New Homes fully support the justified retention of the areas of Green Belt where appropriate and the release of Green Belt land where needed. However, at present the proposed Housing policies and Green Belt policies are not coherent and the reallocation of certain areas of Green Belt is not based on a credible evidence base.

Environmental Issues

Policy ENV4 - Sustainable Drainage Systems (SUDS)

33. Fairview New Homes would like to support the flexibility contained within Policy ENV4 which recognises it is not always viably possible to incorporate SUDS in all developments.

Policy ENV8 - On Site Renewable and Low Carbon Energy Generation

34. We would also like to support Policy ENV8 on the same basis as Policy ENV4 in that it is important that the production of energy from renewable or low carbon sources is only required where it is viably possible so as not to resulting in developments not coming forward.

Transport

Policy T8 - Parking Standards

35. Fairview New Homes object to Policy T8 as it is currently contrary to National Policy requirements as set out in PPG13 which contains maximum parking standards. Indeed, this is recognised at Paragraph 10.27 of the Submission Core Strategy document. Enforcing minimum parking standards is not consistent with local or national sustainability aims and should not be an approach pursued by the Council.

Summary:

Policy H1 - The efficient use of land for housing

11. In general the use of residential extensions to meet the remaining housing requirement that cannot be delivered through the redevelopment of appropriate previously developed land is supported by Fairview New Homes.

12. It is understood there is a need to prioritise use of brownfield land in line with national policy requirements but this needs to be a carefully balanced and realistic approach in identifying appropriate urban extensions to accommodate the majority of the District's housing, as identified in the table at Paragraph 4.6 and later at Paragraph 4.15.

13. Policy H1 sets out that the Council will seek the redevelopment of Rawreth Lane Industrial Estate, Foundry Industrial Estate, Stambridge Mills and Star Lane Industrial Estate. Without sight of the 2009 SHLAA it is not possible to understand whether the Council's choice to release employment land for housing is appropriate and Fairview New Homes cannot, therefore, support this element of Policy H1. This objection is further amplified by the fact additional employment land is required but is yet to be identified.

Change to Plan

Appear at exam? Yes

Soundness Tests i, ii

Core Strategy Submission Document

O - 16663 - 8069 - Policy H1 - The efficient use of land for housing - i, ii, iii

16663 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: A W Squier LTD and the Croll Group [8069]

A W Squier LTD and the Croll Group
Doggetts
Rochford

SS4 3RN

Agent: Andrew Martin Associates Ltd (Mr R Pomery) [7786]

Andrew Martin Associates Ltd
Croxtton's Mill
Little Waltham
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CM3 3PJ
01245 361611

Full Text:

Policy H1 - The Efficient Use of Land for Housing

Summary: The Respondent finds the document to be unsound in its present form, however were the amendments set out in these representations to be incorporated then it is considered that the document will be sound. The aim of this policy, which seeks the efficient use of land for housing, is supported. However, concern is raised in relation to the redevelopment of employment sites for appropriate uses, including residential development.

The Core Strategy does not clearly justify this element of the strategy and concern is raised that the approach may be driven by the target of achieving 60% of new housing on previously developed land.

Full text: Although the Preferred Options version of the Core Strategy (CS) identified that existing employment sites would be reviewed through an Employment Land Study and consideration would be given to reallocating sites for housing where appropriate, the identification of these sites in policy H1 has emerged at a relatively late stage in the process.

It should be noted that the Core Strategy recognises that there is generally sufficient supply of employment sites but that any de-allocation will have to be compensated for. Consequently additional employment land is allocated under policy ED4 in lieu of the employment land to be redeveloped for other uses. This has resulted in greenfield sites being allocated for employment. Whilst this is not disputed in principle, it is important that a careful assessment is undertaken when changing uses of sites or designating new sites.

Whilst the principle of redevelopment of employment sites to alternative uses in certain circumstances is accepted, careful consideration needs to be given as to whether these employment sites should be lost, whether the sites are sustainable locations for alternative uses and whether other constraints such as land assembly, up front construction costs of the units and associated infrastructure or flooding may prevent these sites from coming forward. The loss of employment sites may result in relocation to sites outside the borough. Such constraints can impact upon delivery and given that the Core Strategy only identifies sufficient sites to meet rather than exceed the minimum housing requirements, if site do not come forward the Council may not be able to meet their requirements. In the absence of the SHLAA it is difficult to comprehensively review these employment sites. However, our knowledge of the Stambridge Mill site leads us to query the allocation of this site for alternative uses for the reasons set out below.

The Employment Land Review was completed in 2008 and identifies that the Stambridge Mills site does not have any bad neighbour issues and recommends that it is safeguarded for light industrial use and it also recognises the possibility of this site to accommodate businesses relocated from the Star Lane Industrial Estate. However just one year later this site is now identified as coming forward for alternatives uses in the Core Strategy Submission document.

As recognised in the Council's Urban Capacity Study (UCS) (2007) this site is "relatively isolated", detached from the main settlement and public transport nodes and services. The UCS also identifies that part of the site lies within a flood risk area, that there are possible issues with biodiversity on the site and that infrastructure improvements may be necessary to accompany residential development. The Adopted Local Plan (2006) also recognised at paragraph 4.38 that the "purpose built buildings and location within a flood risk area pose significant constraints on the site for uses other than milling".

Although it is noted that this site is not currently in use, it is considered that its redevelopment would be inappropriate, having regard to the need to find suitable locations for housing in accordance with PPS3 application of the sequential and exception tests under PPS25.

The summary of the Strategic Housing Land Availability Assessment (SHLAA) identifies that the Stambridge Mill site is capable of delivering 250 units between 2010 and 2012. This is substantially higher than the figure of 60 dwellings identified as the capacity for this site in the UCS in 2007.

In the absence of the full SHLAA it is difficult to review the other sites. However it has been demonstrated that at least one of the employment sites, Stambridge Mills, should not come forward for housing. As currently drafted the Plan lacks flexibility to ensure that sufficient sites come forward. The considerable doubt associated with the suitability of Stambridge Mill means that its 250 capacity may need to be reallocated.

Amendment to Policy H1: In order to make this policy sound, the redevelopment of employment sites should be amended to exclude Stambridge Mill (and potentially other employment sites). As currently drafted the policy is not justified as it is neither founded on a robust or credible evidence base and is not the most appropriate strategy when considered against the reasonable alternatives.

Masterplan/Facilities plan Council ref AE22

Summary:

Summary: The Respondent finds the document to be unsound in its present form, however were the amendments set out in these representations to be incorporated then it is considered that the document will be sound. The aim of this policy, which seeks the efficient use of land for housing, is supported. However, concern is raised in relation to the redevelopment of employment sites for appropriate uses, including residential development.

The Core Strategy does not clearly justify this element of the strategy and concern is raised that the approach may be driven by the target of achieving 60% of new housing on previously developed land.

Core Strategy Submission Document

O - 16663 - 8069 - Policy H1 - The efficient use of land for housing - i, ii, iii

16663 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Masterplan/Facilities plan Council ref AE22

Change to Plan Amendment to Policy H1: In order to make this policy sound, the redevelopment of employment sites should be amended to exclude Stambridge Mill (and potentially other employment sites). As currently drafted the policy is not justified as it is neither founded on a robust or credible evidence base and is not the most appropriate strategy when considered against the reasonable alternatives.

Appear at exam? Yes **Soundness Tests** i, ii, iii

Core Strategy Submission Document

S - 16686 - 9072 - Policy H1 - The efficient use of land for housing - None

16686 Support

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Essex County Council (Mr Roy Lewis) [9072] **Agent:** N/A

Essex County Council
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Planning and Transport
County Hall
Chelmsford
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01245-437578

Full Text: ROCHFORD CORE STRATEGY SUBMISSION DOCUMENT, SEPTEMBER 2009
RESPONSE OF ESSEX COUNTY COUNCIL

1. General Comment

Essex County Council welcomes and broadly supports the Core Strategy prepared by Rochford District Council. The Strategy contains policies and proposals that address the spatial characteristics, issues and opportunities facing the District whilst respecting the distinctive qualities of the different settlements and parts of the District.

The County Council fully supports the maintenance of a strong policy approach to protection of the Green Belt and of the quality of environmental assets in the District whilst making adequate housing and employment provision within the District. The Core Strategy presents an approach that emphasises a balance of opportunity through the District and recognition of emerging economic prospects in the District and neighbouring areas. The intended preparation of more detailed Action Area Plans for London Southend Airport and its environs and for each of the three town centres of Rayleigh, Rochford and Hockley will further enhance the approach of the Core Strategy. The emphasis on the three town centres is particularly welcomed as offering a stimulus to improvement in the services and facilities available locally within the District whilst also affording possibilities of increased community focus.

2. Housing Distribution and Locations

The East of England Plan requires Rochford to provide a minimum of 3,790 additional dwellings between 2006 and 2021. In addition, provision for a further 1,000 dwellings should be made between 2021 and 2025 to ensure delivery of housing for at least 15 years from adoption of the Core Strategy (expected in 2010). Of this total requirement the District Council has identified a capacity of 2,000 dwellings through a Strategic Housing Land Availability Assessment. This means that the Core Strategy has to identify locations for about 1,750 dwellings to be delivered before 2021 and a further 1,000 dwellings between 2021 and 2025.

Policy H1 (The efficient use of land for housing) is supported. However, prioritisation of the reuse of previously developed land within settlements for additional housing is unlikely to provide a sufficient source of provision due to the generally residential nature of existing settlements in the district and the absence of potentially large sites of previously developed land. The assessment of potential for additional housing provision within settlements already includes the proposed re-allocation to substantially residential use of 4 existing employment areas.

Within Policy H2 (Extensions to residential envelopes and phasing) and Policy H3 (Extension to residential envelopes post-2021) the District Council has adopted a balanced approach to the distribution of additional housing locations, which is based on identification of tiers of settlements defined by reference to their accessibility to jobs, services and facilities (some of which lie outside the District) and the need to protect the valued environments within the District. This approach is generally supported, although implementation and delivery of individual schemes should give further thought to securing sustainable functional relationships between proposed development locations and availability of jobs, services and facilities.

The proposed scale and phasing of development at each of the identified locations in Policy H2 and Policy H3 should be capable of being supported by County Council service groups, provided that adequate and timely funding is available. The County Council would wish to work with the District Council to ensure that future infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

3. Economic Development

The approach to Employment Growth (Policy ED1) is supported. Given the economic structure of Rochford District the support to be given to protection and enhancement of the role of small and medium sized businesses; enhancement of the District's commercial centres; and development of a skills training academy is particularly welcome. These measures will assist in building on the existing economic resource of the District.

Proposals for the comprehensive development of London Southend Airport and its environs (Policy ED2) are supported.

Core Strategy Submission Document

S - 16686 - 9072 - Policy H1 - The efficient use of land for housing - None

16686 Support

CHAPTER 4 Policy H1 - The efficient use of land for housing

The further elaboration of proposals through an Area Action Plan will provide a firm foundation to realise the economic regeneration and growth opportunities presented by effective use of the Airport. The recognition of the potential environmental impact of the Airport and the commitment to work to mitigate any adverse impacts on the environment and local amenities is fully supported.

The location of the proposed Eco-Enterprise Centre to the North of London Southend Airport (Policy ED4) is supported. Creation of the Centre would assist reduction of the rate of business start-up failure in the district. Further the proposed location for the Centre would afford a clear offer to businesses within an area of varied business activity.

The continued protection and enhancement of existing employment land (Policy ED3) is supported, as is the identification of 4 existing employment sites for appropriate alternative, substantially residential, uses. Each of the 4 sites affords particular issues and opportunities whereby their redevelopment for other uses and relocation of existing occupiers would confer advantage for the immediately neighbouring areas and for the District as a whole.

4. Town Centres

The town centres of Rayleigh, Rochford and Hockley, and future plans for them, are closely linked to the economic development of the District but also present the opportunity to offer greater community focus within the District. The varied approach being taken to each of these town centres is supported (Policy RTC4, RTC5 and RTC6), notably the recognition of the role and purpose of the town centres beyond retail uses.

The contribution that the County Library service could make to plans for the town centres should not be overlooked. The 5 libraries in the District are substantial footfall draws in their localities and act as a 'community anchor store'. This has knock-on effects in encouraging use of neighbouring retail and service facilities. Further the Library service is currently looking at co-location opportunities for other services within the libraries which would enable them to act as a community focus.

5. Transport

The transport aspects of the Core Strategy are well balanced in identifying potential measures that would meet the needs of existing residents and businesses in the District as well as needs arising from future development. The approach reflects and makes good reference to the transportation aspirations of the County Council. The policy emphasis on close working between the District Council and the County Council to advance the transport aspirations is welcomed and fully supported.

In relation to parking standards (Policy T8 and Paragraph 10.30) the review undertaken by Essex County Council in conjunction with the Essex Planning Officers Association has now been completed. Revised parking standards have been agreed and signed off as County Supplementary Guidance, in accordance with PPS12, and is being applied by the County Council as Local Highways Authority.

6. Coastal Protection Belt

Policy ENV2 (Coastal Protection Belt) is not supported because in its current form it is not a suitable or effective replacement policy for Policy CC1 of the Replacement Structure Plan. Structure Plan Policy CC1 (The Undeveloped Coast - Coastal Protection Belt) currently remains a 'saved' policy of the Essex and Southend-on-Sea Replacement Structure Plan, April 2001 (following a direction of the Secretary of State, dated 27th September 2007, under paragraph 1(3) of Schedule 8 to the Planning and Compulsory Purchase Act 2004). The existing Policy CC1 reads, 'Within the Coastal Protection Belt defined in adopted local plans there shall be the most stringent restrictions on development within the rural and undeveloped coastline situated outside existing built-up areas, and any development which is exceptionally permitted within this Belt shall not adversely affect the open and rural character, historic features or wildlife.'

Core Strategy Policy ENV2 should be revised to include specific reference to,

- * Definition of the boundary of the Coastal Protection Belt in another Development Plan Document;
- * the application of the most stringent restrictions on development within the rural and undeveloped coastline;
- * any development exceptionally permitted not adversely affecting the open and rural character, historic features or wildlife.

7. Historic Environment

The importance of the historic environment in Rochford District is clearly identified within the Core Strategy document. Nevertheless, the policy guidance could be usefully enhanced to promote consideration and enhancement of the historic environment and use of the historic environment to shape place. This would be achieved by the following amendments to the Core Strategy,

- * Policy ENV1 (Protection and Enhancement of the Natural Landscape and Habitats and the Protection of Historical and Archaeological Sites) should be amended by deletion of the final sentence and its replacement with, 'The Council is committed to the protection, promotion and enhancement of the diverse historic landscape and extensive surviving archaeological deposits of the District.'

Core Strategy Submission Document

S - 16686 - 9072 - Policy H1 - The efficient use of land for housing - None

16686 Support

CHAPTER 4 Policy H1 - The efficient use of land for housing

* Paragraph 8.15 of the supporting text should be amended to better support the suggested amendment to Policy ENV1. The existing text of Paragraph 8.15 should be deleted in its entirety and replaced by,
The historic environment of Rochford District has developed through a history of human activity that spans over 450,000 years. Much of the resource lies hidden beneath the ground in the form of archaeological deposits. Other elements such as the historic landscape, the pattern of field, farms, woods and grazing marsh which characterise the District, are a highly visible record of millennia of agriculture, industry and commerce. Of particular significance are the coastal, island and estuarine areas where multi-period landscapes reflecting the exploitation of coastal and marshland resource survive. The District also includes the important historic medieval market towns of Rochford and Rayleigh.

* Page 16 (Sustainable Community Strategy Priority: Promoting a Greener District) should be amended to further support the approach to the Historic Environment. The fourth bullet of the Key Section/Policies of the Core Strategy should be amended to include the word 'historic', so that the first sentence of the bullet would read,
The Environment chapter seeks to protect and enhance the biodiversity, historic and natural environment of the District by protecting sites of local, national and international importance.

8. Community Infrastructure

The approach to Community Infrastructure is supported. The County Council would wish to work with the District Council to ensure that future community infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

In addition, it should be noted that,

* Some County Council services are not highly visible despite being regarded as highly desirable community services by local residents. The need to ensure adequate funding and contributions to enable these services to meet community expectations should be recognised and acknowledged in consideration of planning obligations and standard charges.

* The Adult Community Learning Centre at Rocheway, Rochford could be better located with regard to the wider Rochford/Castle Point area of service. Relocation of the Centre could provide opportunities both at the new location and for the current site.

* The Core Strategy should make specific reference to,

o Appendix H1, Location at South Canewdon: new Early Years and Childcare facilities;

o Policy CLT2, final sentence: insert after the words 'primary schools' the words 'and Early Years and Childcare facilities';

o Appendix CLT1, Other issues/comment: for Early years and childcare facilities add 'Land to be allocated within new residential areas, as appropriate'.

9. Implementation, Delivery and Monitoring

The inclusion in the Core Strategy of a section considering Implementation, Delivery and Monitoring is welcomed and supported. Nevertheless, the District Council, in moving towards implementation and delivery of the individual elements of the Core Strategy, should highlight those schemes and projects that are critical to achievement of other aspects of the Strategy.

Further, the monitoring proposal for Policy H6 (Lifetime Homes) and for Policy CP1 (Design) should be amended,

* Policy H6 (Lifetime Homes) - the identified monitoring tool is Core Indicator H6 Housing Quality Building for Life Assessments. The Building for Life Assessment methodology was devised to measure the overall design/layout quality of housing developments. It was not devised to measure compliance with Lifetime Homes, which is largely, but not exclusively, concerned with internal space standards and the provision of internal arrangements within dwellings to meet needs of all residents.

* Policy CP1 (Design) - the monitoring indicator proposed by the Core Strategy is not supported because it is unclear what the indicator would actually be measuring. The proposed indicator should be replaced by the Core Indicator, Housing Quality - Building for Life Assessments, as suggested by the County Council in its response to the Core Strategy Preferred Options, October 2008. A better approach would be to base evaluation and monitoring of Policy CP1 on the Commission for Architecture and the Built Environment's (CABE) 20 Building for Life principles, particularly as Government has endorsed these principles and is urging local authorities to use them to assess design quality. It is suggested that the monitoring arrangements for Preferred Option CP1 be deleted and replaced by the following text, 'The success of the implementation of this policy will be monitored by assessing schemes, or an appropriate sample of schemes, against the Commission for Architecture and the Built Environment's (CABE) Building for Life principles.'

10. Access to Housing

The Core Strategy notes the higher prevalence of older people in Rochford District and the need to support them. However, a more broadly based approach to access to housing should be adopted by Policies H4, H5 and H6. It should recognise the presence of other vulnerable adults in the community, for example, those with learning or mental health disability, and the range of possible forms of accommodation, including supported, sheltered and extra care accommodation. The high level of owner occupation in the District further emphasises the need for a broader approach. The emphasis on Lifetime Homes would not address the variety of future needs, whilst the potential exemptions to the

Core Strategy Submission Document

S - 16686 - 9072 - Policy H1 - The efficient use of land for housing - None

16686 Support

CHAPTER 4 Policy H1 - The efficient use of land for housing

Summary: Lifetime Homes policy standard in Policy H6 are likely to act against demographic trends. Policy H1 (The efficient use of land for housing) is supported. However, prioritisation of the reuse of previously developed land within settlements for additional housing is unlikely to provide a sufficient source of provision due to the generally residential nature of existing settlements in the district and the absence of potentially large sites of previously developed land. The assessment of potential for additional housing provision within settlements already includes the proposed re-allocation to substantially residential use of 4 existing employment areas.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16710 - 7834 - Policy H1 - The efficient use of land for housing - i

16710 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Ms G Yeadell [7834]

6 Southend Road
Hockley
Essex
SS5 4QQ
01702 205450

Agent: N/A

Full Text: Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1

Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2 you discarded N.E.Hockley as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley..along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

Response to C.S Preferred Options 2008 and HAAP 2009

June 2009 issue C S Submission issue says Eldon Way will be used for housing, whereas Sept.2009 issue says "alternative uses, including residential.." to be decided by HAAP (Issues consultation done, Pref.Options issue awaited, but judging from JAAP Pref.Options decision - namely biggest option chosen against overriding opposition, it will be housing).

Need to be logical and even-handed in proposals

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

Establish likely level of Standard Charges. Accept you cannot turn district into motorways with wholesale demolition.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

Para.10.5 "..highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which cannot be altered without much destruction.

Reply to CS Pref. Options 2008 & HAAP Issues/Options 2009

Policy T3, CLT1 Appendix CLT1 Public transport RDC admits this is in the private sector. In Hockley, operator has cut No7 service to 1 per hour from Ashingdon Schools, claiming it is unviable beyond. This is unlikely to change as Hockley is car dependant. No8 bus through Hawkwell is cut to 1 per hour to Rayleigh, for same reason as No7. Proposed planning agreements with developers can't run: eg, a community centre or classroom given by a developer remains once he has moved on - how can that apply for an on-going bus service?

Reply to Infrastructure Transport in CS Pref. Opts. 2008 and to HAAP Issues Opts. 2009.

Ch.11 Economic development

Policy ED3 Core Strategy preferred Options 2008 hinted at possible housing in Eldon Way site. June 2009 Submission version, without consultation, said Eldon Way would be housing (map included Foundry, not the text). September 2009 Submission said redevelopment would be in HAAP (which apart from the Issues/Options version, is unfinished. Judging from results of JAAP Preferred Options where biggest option is chosen, though most respondents were against it, site will be housing, without consultation.

Core Strategy Submission Document

16710 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Para.1.25, Para.11.32 Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to accommodated employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

Reply to HAAP Issues Options 2009

Remove compulsory relocation

Policy ED4 Policy states Council will allocate 18ha of land to make up for de-allocations in ED3 - that proves point above.

Proposals for moving employment to out of town locations with no existing transport links are contrary to government policies PPG4, PPS1 and PPS4 and Core Strategy Policy T1.

Evidence Base is ignored by contravening Hockley Parish Plan 2007 and ignoring residents' views on HAAP Issues/Options. Next stage of HAAP Preferred Options is pre-empted and rendered irrelevant. Core Strategy plans to relocate Eldon Way Foundry estate to Greenfield site with no nearby bus or railway. RDC plans to upgrade the nearest road to dual carriageway, though the connecting B1013 (through Hockley) will stay single, said by ECC Highways statistics to be 72% capacity. Airport bosses and council cannot suggest there will be no traffic growth from JAAP and new industrial site.

Reply to Hockley Parish Plan 2007. HAAP Issues 2009

Move to new industrial site near airport contravenes PPS4:

- EC7.3C "out of centre sites, with preference given to sites...well served by choice of...transport and...close to centre and...high likelihood of forming links with centre". There is no current public transport and links with centres is unlikely".

- EC 7.5.1 "whether the site is or will be accessible and well served by choice of transport, public transport, walking and cycling, as well as by car...". Remote location, narrow busy B1013 makes the site unsuitable for access by cycle or on foot.

It also contravenes PPS1 (27vii)... "reduce need to travel, encourage accessible public transport provision to secure more sustainable patterns of transport...Planning should actively manage patterns of urban growth to make fullest use of public transport and focus development in existing centres, near to major public transport interchanges". Core Strategy undermines its own policy Transport and Highways policy T1 and is unsound.

Although shown on accompanying drawing in earlier versions, there was no prior textual mention of Foundry industrial estate (next to Eldon Way) for redevelopment until current CS 2009 Submission. This was stated to be a typing error, but does not inspire confidence in reliability of drafting.

Revise both 2009 Core Strategy and 2009 HAAP Issues/options

Chapter 12: Retail/Town centres

The Core Strategy misrepresents findings of the Retail and Leisure Study 2008.

Para.12.38 The Core Strategy states (para.12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace."

Whereas the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure".

2) (10.28) "There is no immediate capacity for additional floorspace".

3) (10.29) "we recommend focus be maintained on developing Hockley's existing strengths, rather than retail expansion"

4) 10.31 "the current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it has a very small catchment population. Accordingly, the council may wish to consider reclassifying Hockley from a town centre to a district centre".

Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

The Council will work with landowners and its partners to deliver the HAAP.

Remove threat of compulsory purchase orders.

Core Strategy Submission Document

O - 16710 - 7834 - Policy H1 - The efficient use of land for housing - i

16710 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

One doesn't perceive impartiality when the Planning Director replies to local HAAP survey with "The affluent people of Hockley are entitled to famous name shops".

Chapter 5: Character of Place and Local Lists

Para.5.4 "Rochford district has unique character..stems from traditional buildings..still dominate towns and villages".

Para.5.17 "Council believes many buildings..are of local distinctiveness..part of..cherished local scene".

This only applies to favoured places: Rochford, Rayleigh, greenbelt villages. Many Hockley conservable items have been systemically removed for supposedly lucrative development in face of widespread protect. This is for supposed need for housing. In fact heritage items have been replaced by dwellings most cannot afford, and/or are hard to sell due to unsuitability of massing and siting. Many other homes are jeopardised by this practice.

HAAP issues 2009. Core Strategy 2006, 2007,2008, SCI.2006

Fewer 'vested interests', more even handedness. No more pressing people out of businesses, homes for expediency.

A CPRE Fieldwork issue extolled Local Lists, citing refusal of 16 flats to replace character house, not on local list. Inspector said house, facade made a contribution to area character, even if English heritage decided it didn't warrant listing. Council worked to get the house grade listed and even made adjacent area conservation one.

Hockley had one such on a "significant site" faced with 13 flats. Ward Member omitted house from refusal proposal, so house could be demolished. RDC dropped Local List ahead of appeal: "Government frowned on such Lists" (Other LAs, unaware of supposed directive retained theirs. After demolition RDC restored Local Lists, saying Government now support them. When Inspector queried the complaint, the then policy officer said "just politics, lot of local interest, nothing of character in the area[!]. (A dozen such items had been removed). Some "distinctive" Hockley buildings are still condemned (in Greensward Lane., others threatened (Spa Road). Whereas a modest hue and cry in Rayleigh will usually result in a building being saved.

Conclusion

Core Strategy Submission DPD is basically unsound in many respects

Incomplete information. Amongst others, it refers to Hockley AAP, the first stage of which is complete, but not other three. Rochford AAP first stage has been published in arrears of Core Strategy Submission. Rayleigh AAP is still awaited. Precise housing sites are absent, as Urban Capacity Study 2007 has been superseded by Strategic Housing Land Availability Assessment, not yet published. Traders, residents, are thus responding to Core Strategy Submission with incomplete information.

Lack of community involvement. Chapter 1, Introduction, para. 1.11 "Community involvement is an essential part of the plan making process".

In Statement of Community Involvement 2006 Rochford RDC "recognises need to enable people to have their voices heard".

Re Public Meetings: "Consideration will be had to timing and venue to ensure meeting is as accessible as possible".

Take Hockley Area Action Plan as an example of the opposite of all this:- Presentation of document was at Hullbridge, 7.30pm. It was also discussed with JAAP at Rochford Freight House (for traders only) at 7am, without publicity. Excuse made: HAAP on RDC website, which none will seek unless knowing it is there. Rochford District Matters newsheet had minute articles on p.3, half way through consultation period. Another excuse: a 2nd presentation by Hockley Residents Association with planning officer present: only because of complaints, and it is not the HRA's responsibility to RDC's job. Due to unavoidable haste of calling meeting, few knew and only 50 were present.

In Core Strategy Submission Hockley Parish Plan has been ignored. Proposals also ignore 95% rejection rate response to HAAP 2009, which included proposals for Eldon Way employment site.

Unfettered right of developers to carry on as if Core Strategy didn't exist. In PPS 12, Ch.4.6 states: "Core Strategies should be flexible and able to show how they handle contingencies". Several large planning applications have been submitted proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS 12.

Where are we? Finally, at Chapter 1, Introduction, para. 1.24: "the Core Strategy will have to be reviewed in the event of a new Local Area Agreement, post-2011, setting different priorities". So what purpose does all this work serve? So we have hardly finished this exercise, before it all starts again?

Summary:

Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Core Strategy Submission Document

O - 16710 - 7834 - Policy H1 - The efficient use of land for housing - i

16710 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Policy H1

Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2 you discarded N.E.Hockley as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley..along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

June 2009 issue C S Submission issue says Eldon Way will be used for housing, whereas Sept.2009 issue says "alternative uses, including residential.." to be decided by HAAP (Issues consultation done, Pref.Options issue awaited, but judging from JAAP Pref.Options decision - namely biggest option chosen against overriding opposition, it will be housing).

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Change to Plan

Need to be logical and even-handed in proposals

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

16742 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Hockley Under Threat (J Abbey) [14229]

Hockley Under Threat
None provided

Agent: N/A

Full Text:

Ch. 4 Housing; Ch.10 Transport, Highways; Ch.11 Economic Development; Ch.12 Retail/town centres; Ch.5 Character of place & Local Lists

Chapter 4: Housing

Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1, Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2

N.E.Hockley was discarded as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley...along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

Need to be logical and even-handed in proposals

June 2009 issue C S Submission issue says Eldon Way will be used for housing, whereas Sept.2009 issue says "alternative uses, including residential.." to be decided by HAAP (Issues consultation done, Pref.Options issue awaited, but judging from JAAP Pref.Options decision - namely biggest option chosen against overriding opposition, it will be housing).

Policy H1, T1 Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG14 & PPS1. it also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths",

The Core Strategy also contravenes its own policy T1 and is unsound.

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

Establish like motorways with wholesale demolition.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts.

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Para.10.5

Policy T3, CLT1 Appendix CLT1

T1 & T2 "...highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which

Core Strategy Submission Document

16742 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

cannot be altered without much destruction.

Public transport RDC admits this is in the private sector. In Hockley, operator has cut No 7 service to one per hour from Ashingdon Schools, claiming it is unviable beyond. This is unlikely to change as Hockley is car dependant. No 8 bus through Hawkwell is cut to one per hour to Rayleigh, for same reason as No 7. Proposed planning agreements with developers can't run: e.g., a community centre or classroom given by a developer remains once he has moved on - how can that apply for an on-going bus service?

Ch.11 Economic development

Policy ED3 Core Strategy preferred Options 2008 hinted at possible housing in Eldon Way site. June 2009 Submission version, without consultation, said Eldon Way would be housing (map included Foundry, not the text). September 2009 Submission said redevelopment would be in HAAP (which apart from the Issues/Options version, is unfinished. Judging from results of JAAP Preferred Options where biggest option is chosen, though most respondents were against it, site will be housing, without consultation.

Para.1.25 Para.11.32

Policy ED4 T1 & T2 Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to accommodated employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

Remove compulsory relocation

Policy states Council will allocate 18ha of land to make up for de-allocations in ED3 - that proves point above.

Proposals for moving employment to out of town locations with no existing transport links are contrary to government policies PPG4, PPS1 and PPS4 and Core Strategy Policy T1.

Evidence Base is ignored by contravening Hockley Parish Plan 2007 and ignoring residents' views on HAAP Issues/Options. Next stage of HAAP Preferred Options is pre-empted and rendered irrelevant.

Core Strategy plans to relocate Eldon Way Foundry estate to Greenfield site with no nearby bus or railway. RDC plans to upgrade the nearest road to dual carriageway, though the connecting B1013 (through Hockley) will stay single, said by ECC Highways statistics to be 72% capacity. Airport bosses and council cannot suggest there will be no traffic growth from JAAP and new industrial site.

Revise both 2009 Core Strategy and 2009 HAAP Issues/options

Move to new industrial site near airport contravenes PPS4:

EC7.3C "out of centre sites, with preference given to sites..well served by choice of..transport and..close to centre and..high likelihood of forming links with centre". There is no current public transport and links with centres is unlikely".

EC 7.5.1 "whether the site is or will be accessible and well served by choice of transport, public transport, walking and cycling, as well as by car..". Remote location, narrow busy B1013 makes the site unsuitable for access by cycle or on foot.

It also contravenes PPS1 (27vii).. "reduce need to travel, encourage accessible public transport provision to secure more sustainable patterns of transport..Planning should actively manage patterns of urban growth to make fullest use of public transport and focus development in existing centres, near to major public transport interchanges". Core Strategy undermines its own policy Transport and Highways policy T1 and is unsound.

H1 & RTC6 Although shown on accompanying drawing in earlier versions, there was no prior textual mention of Foundry industrial estate (next to Eldon Way) for redevelopment until current CS 2009 Submission. In recent amendment to the CS this was stated to be due to a typing error!

Chapter 12: Retail/Town centres

The Core Strategy misrepresents findings of the Retail and Leisure Study 2008.

Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

Para.12.38 H1 & RTC6 The Core Strategy states (para.12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace."

Whereas the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food

Core Strategy Submission Document

16742 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

shopping expenditure".

2) (10.28) "There is no immediate capacity for additional floorspace".

3) (10.29) "we recommend focus be maintained on developing Hockley's existing strengths, rather than retail expansion"

4) 10.31 "the current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it has a very small catchment population. Accordingly, the council may wish to consider reclassifying Hockley from a town centre to a district centre".

Remove threat of compulsory purchase orders.

The Council will work with landowners and its partners to deliver the HAAP.

Chapter 5: Character of Place and Local Lists

Para.5.4 "Rochford district has unique character..stems from traditional buildings..still dominate towns and villages".

Para.5.17 "Council believes many buildings..are of local distinctiveness..part of..cherished local scene".

This only appears to apply to certain places: Rochford, Rayleigh, greenbelt villages. Many Hockley conservable items have been systemically removed for supposedly lucrative development in face of widespread protect. This is for supposed need for housing. In fact heritage items have been replaced by dwellings most cannot afford, and/or are hard to sell due to unsuitability of massing and siting. Many other homes are jeopardised by this practice.

Conclusion

Core Strategy Submission DPD is basically unsound in many respects:

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Summary:

Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1 Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2

N.E.Hockley was discarded as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley...along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

Core Strategy Submission Document

O - 16742 - 14229 - Policy H1 - The efficient use of land for housing - i, iii

16742 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

June 2009 issue C S Submission issue says Eldon Way will be used for housing, whereas Sept.2009 issue says "alternative uses, including residential.." to be decided by HAAP (Issues consultation done, Pref.Options issue awaited, but judging from JAAP Pref.Options decision - namely biggest option chosen against overriding opposition, it will be housing).

Policy H1, T1 Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG14 & PPS1. it also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths",

The Core Strategy also contravenes its own policy T1 and is unsound.

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Change to Plan Need to be logical and even-handed in proposals

Appear at exam? Not Specified **Soundness Tests** i, iii

Core Strategy Submission Document

16759 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Hockley Under Threat (J Abbey) [14229]

Hockley Under Threat
None provided

Agent: N/A

Full Text:

Ch. 4 Housing; Ch.10 Transport, Highways; Ch.11 Economic Development; Ch.12 Retail/town centres; Ch.5 Character of place & Local Lists

Chapter 4: Housing

Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

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Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

Establish like motorways with wholesale demolition.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts.

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Para.10.5

Policy T3, CLT1 Appendix CLT1

T1 & T2 "...highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which

Core Strategy Submission Document

16759 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

cannot be altered without much destruction.

Public transport RDC admits this is in the private sector. In Hockley, operator has cut No 7 service to one per hour from Ashingdon Schools, claiming it is unviable beyond. This is unlikely to change as Hockley is car dependant. No 8 bus through Hawkwell is cut to one per hour to Rayleigh, for same reason as No 7. Proposed planning agreements with developers can't run: e.g., a community centre or classroom given by a developer remains once he has moved on - how can that apply for an on-going bus service?

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Policy ED3 Core Strategy preferred Options 2008 hinted at possible housing in Eldon Way site. June 2009 Submission version, without consultation, said Eldon Way would be housing (map included Foundry, not the text). September 2009 Submission said redevelopment would be in HAAP (which apart from the Issues/Options version, is unfinished. Judging from results of JAAP Preferred Options where biggest option is chosen, though most respondents were against it, site will be housing, without consultation.

Para.1.25 Para.11.32

Policy ED4 T1 & T2 Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to accommodated employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

Remove compulsory relocation

Policy states Council will allocate 18ha of land to make up for de-allocations in ED3 - that proves point above.

Proposals for moving employment to out of town locations with no existing transport links are contrary to government policies PPG4, PPS1 and PPS4 and Core Strategy Policy T1.

Evidence Base is ignored by contravening Hockley Parish Plan 2007 and ignoring residents' views on HAAP Issues/Options. Next stage of HAAP Preferred Options is pre-empted and rendered irrelevant.

Core Strategy plans to relocate Eldon Way Foundry estate to Greenfield site with no nearby bus or railway. RDC plans to upgrade the nearest road to dual carriageway, though the connecting B1013 (through Hockley) will stay single, said by ECC Highways statistics to be 72% capacity. Airport bosses and council cannot suggest there will be no traffic growth from JAAP and new industrial site.

Revise both 2009 Core Strategy and 2009 HAAP Issues/options

Move to new industrial site near airport contravenes PPS4:

EC7.3C "out of centre sites, with preference given to sites..well served by choice of..transport and..close to centre and..high likelihood of forming links with centre". There is no current public transport and links with centres is unlikely".

EC 7.5.1 "whether the site is or will be accessible and well served by choice of transport, public transport, walking and cycling, as well as by car..". Remote location, narrow busy B1013 makes the site unsuitable for access by cycle or on foot.

It also contravenes PPS1 (27vii).. "reduce need to travel, encourage accessible public transport provision to secure more sustainable patterns of transport..Planning should actively manage patterns of urban growth to make fullest use of public transport and focus development in existing centres, near to major public transport interchanges". Core Strategy undermines its own policy Transport and Highways policy T1 and is unsound.

H1 & RTC6 Although shown on accompanying drawing in earlier versions, there was no prior textual mention of Foundry industrial estate (next to Eldon Way) for redevelopment until current CS 2009 Submission. In recent amendment to the CS this was stated to be due to a typing error!

Chapter 12: Retail/Town centres

The Core Strategy misrepresents findings of the Retail and Leisure Study 2008.

Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

Para.12.38 H1 & RTC6 The Core Strategy states (para.12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace."

Whereas the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food

Core Strategy Submission Document

16759 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

shopping expenditure".

2) (10.28) "There is no immediate capacity for additional floorspace".

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4) 10.31 "the current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it has a very small catchment population. Accordingly, the council may wish to consider reclassifying Hockley from a town centre to a district centre".

Remove threat of compulsory purchase orders.

The Council will work with landowners and its partners to deliver the HAAP.

Chapter 5: Character of Place and Local Lists

Para.5.4 "Rochford district has unique character..stems from traditional buildings..still dominate towns and villages".

Para.5.17 "Council believes many buildings..are of local distinctiveness..part of..cherished local scene".

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Change to Plan

Appear at exam? Not Specified **Soundness Tests** i, iii

Core Strategy Submission Document

16762 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Hockley Under Threat (J Abbey) [14229]

Agent: N/A

Hockley Under Threat
None provided

Full Text: Ch. 4 Housing; Ch.10 Transport, Highways; Ch.11 Economic Development; Ch.12 Retail/town centres; Ch.5 Character of place & Local Lists

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Core Strategy Submission Document

16762 Object

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Core Strategy Submission Document

O - 16762 - 14229 - Policy H1 - The efficient use of land for housing - i, iii

16762 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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The Council will work with landowners and its partners to deliver the HAAP.

Change to Plan Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

Remove threat of compulsory purchase orders.

Appear at exam? Not Specified **Soundness Tests** i, iii

Core Strategy Submission Document

O - 16821 - 9676 - Policy H1 - The efficient use of land for housing - i, ii, iii

16821 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Bellway Homes [9676]

Bellway Homes
Bellway House
Bury Street
Ruislip
Middlesex
HA4 7SD
UK

Agent: Barton Willmore LLP (Mr E Hanson) [14266]

Barton Willmore LLP
7 Soho Square
London

W1D 3QB

020 7446 6888

Full Text:

See statement

Council ref AE18 and AE18a

Summary:

See statement

Council ref AE18 and AE18a

Change to Plan

See statement

Council ref AE18 and AE18a

Appear at exam? Yes

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 16834 - 9912 - Policy H1 - The efficient use of land for housing - i, ii

16834 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: M D Smith & Son [9912]

M D Smith & Son
Hambro Nurseries
Chelmsford Road
Battlesbridge
Wickford
SS11 8SY

Agent: Andrew Martin Associates Ltd (Mr David Maxwell)
[9911]

Andrew Martin Associates Ltd
Croxtan's Mill
Little Waltham
Chelmsford
Essex
CM3 3PJ
01245 361611

Full Text:

Policy H1 is neither justified nor effective. We strongly support the need to re-use previously developed land when seeking to deliver the District's housing requirements. Nevertheless, policy H1 should also recognise the suitability of redeveloping previously developed land that falls outside the settlement boundaries where sites are sustainably located close to existing community facilities and services. The Council has given inadequate time or opportunity for stakeholders to review and comment on the contents and recommendations of the SHLAA.

The Core Strategy is likely to be ineffective due to the considerable difficulties in actually delivering the redevelopment of Rawreth Lane Industrial Estate, Eldon Way/Foundary Industrial Estate, Stambridge Mills and Star Lane Industrial Estate. There are few guarantees that these sites will be released for alternative uses. The Core Strategy is unsound in seeking to displace these existing employment uses to Greenfield sites, particularly where those sites are located in the Green Belt.

Supporting document received Council ref AE23

It is recommended that the following wording should be provided at policy H1:

'The Council will prioritise the reuse of previously developed land both within and outside settlement boundaries and ensure the delivery of appropriate sites identified by the Strategic Housing Land Availability Assessment'.

Summary:

Policy H1 is neither justified nor effective. We strongly support the need to re-use previously developed land when seeking to deliver the District's housing requirements. Nevertheless, policy H1 should also recognise the suitability of redeveloping previously developed land that falls outside the settlement boundaries where sites are sustainably located close to existing community facilities and services. The Council has given inadequate time or opportunity for stakeholders to review and comment on the contents and recommendations of the SHLAA.

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Appear at exam? No

Soundness Tests i, ii

Core Strategy Submission Document

O - 16846 - 9889 - Policy H1 - The efficient use of land for housing - i, ii, iii

16846 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Environment Agency (Miss Carrie Williams) [9889] **Agent:** N/A

Environment Agency
Iceni House
Cobham Road
Ipswich
Suffolk
IP3 9JD
United Kingdom
01473 706007

Full Text:

This policy indicates the inclusion of Stambidge Mills as a site for very high density housing development. No evidence is provided within the consultation package that the Sequential Test and Exception Test have been applied, as required by paragraphs 14-20 of Planning Policy Statement 25. This site lies wholly within Flood Zone 3, the high risk flood zone as defined in Table D1 of PPS25 and illustrated by the flood maps produced by the Environment Agency. The site is also situated adjacent to the tidal River Roach. It does benefit from some form of flood defence but no information has been provided as to the actual level of flood risk experienced at this site in the form of a PPS25 compliant Strategic Flood Risk Assessment (SFRA). The Thames Gateway South Essex SFRA provided in the evidence base was completed under the terms of PPG25 in 2006 and as such, the climate change allowances are now outdated. Also the 2006 SFRA does not include an assessment of flood risk at this site/in this general location. We therefore also cannot be certain that the site is capable of achieving the requirements of part c of the PPS25 Exception Test - this would make it undeliverable and undevelopable as defined by Planning Policy Statement 3: Housing.

Given the information above we deem the Core Strategy unsound on the grounds that it does not demonstrate compliance with national flood risk policy as set out in PPS25 in that the Sequential Test has not been applied and there is no evidence that, should the Sequential test be passed, the proposed residential development at Stambidge Mills would be capable of passing part c of the Exception Test. Also the Core Strategy is not supported by an up-to-date SFRA as required by paragraph 12.

The lack of a PPS25 compliant SFRA and Sequential and Exception Tests document also means that we find the Core Strategy unsound on the grounds that it is not justified because it is not supported by relevant and up-to-date background evidence. We do note that the (draft) SHLAA goes some way in attempting to justify the inclusion of the Stambidge Mills site, but in our opinion it does not go far enough.

The Core Strategy is also not consistent with national policy set out in PPS3 because Policy H1 might not be able to demonstrate the delivery of a flexible supply of land for housing if Stambidge Mills is found to be undeliverable and undevelopable. This is especially true as the Strategic Housing Land Availability Assessment (2009) Summary Schedule of Sites provided in the evidence base supporting this submission document shows the Stambidge site to be ideally developed between 2010-2012 and therefore within the five year housing supply required by PPS3.

In addition, we would argue that the Core Strategy is not sound because it is not effective. Should the Stambidge Mills site be found to be undevelopable, the Core Strategy does not explore alternatives to accommodate their required growth targets. We therefore cannot be certain that policy H1 represents the most appropriate policy because there is no clear comparison against alternatives.

Furthermore, we do not believe that the Core Strategy is supported by sufficient evidence to justify the underlying assumption that protecting greenbelt land should take preference to avoiding high density development in areas within Flood Zone 3 which would pose risks to life and property. The general approach of giving priority to brownfield land is in line with national policy within PPS3, however PPS3 also recognises the need to take into account environmental constraints and risks, including flood risk, in setting out strategies for the planned location of new housing in order to achieve sustainable development objectives set out in Planning Policy Statement 1 and that some sites might not therefore be suitable for housing (see paragraphs 38 and 41). This ties in with the process of applying the PPS25 Sequential Test and Exception Test which places flood risk classification and the vulnerability of proposed developments as the primary concern, with the designation of land as brownfield as a secondary consideration when applying part b of the Exception Test. Given that the national target of 60% redevelopment of previously developed land (as required by PPS3) is deemed unrealistic in Rochford District (paragraph 4.15 of this Core Strategy) and that Policy H2 indicates that there will therefore be a need to release greenbelt land in order to accommodate required growth in nonconformity with Planning Policy Guidance note 2, there is no justification to support the assumption that developing the brownfield land in the high risk flood zone is the most appropriate course of action given the reasonable alternative of accommodating those housing figures in areas at lesser flood risk - either by releasing a minimal additional amount of greenbelt, or by slightly increasing density of development elsewhere.

In the absence of a PPS25 compliant SFRA and Sequential Test document the only option is to remove specific mention to Stambidge Mills from Policy H1 and Appendix H1 and build in flexibility to the plan in recognising the potential need to reallocate the balance of housing to more sustainable locations in Flood Zone 1, the low risk flood zone as defined by Table D.1 of PPS25 and illustrated by the Environment Agency's flood maps. This would make the proposed policy consistent with national policy as set out in PPS1, PPS3 and PPS25. It would also remove our other concerns under the two other tests of soundness. We also consider that it would still be consistent with Policy GB1 of this Core Strategy.

If this course of action is taken, we would suggest the removal of the fourth paragraph from the policy and the following rewording of the third paragraph:

"The council will seek the redevelopment of brownfield land, including under-utilised employment areas, for appropriate

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O - 16846 - 9889 - Policy H1 - The efficient use of land for housing - i, ii, iii

16846 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

alternative uses, including residential development, subject to meeting the requirements of national policy as set out in PPS1, PPS3 and PPS25. Alternative employment land will be allocated in appropriate locations as identified in Policy ED4".

In making the above changes, we feel that an updated SFRA would not be required at this stage and that a Sequential Test document could also be avoided.

Should the LPA wish to retain reference to Stambridge Mills, we would expect this Core Strategy to be supported by a PPS25 compliant Strategic Flood Risk Assessment (SFRA). This would provide clear evidence of the flood risk posed to the district upon which to base the application of the PPS25 Sequential Test. It would also provide the necessary evidence base on which to establish the likelihood that part c of the PPS25 Exception Test can be passed. Applying the PPS25 Sequential test will allow for all of the available alternatives to be properly assessed and would thereby provide clear and transparent justification of the LPAs decisions. It would also have to address the issue of prioritising brownfield development in areas of flood risk when some greenbelt land in areas of lesser flood risk is already being released. Some rewording of the policy might be necessary following the completion of these studies in order to deem policy H1 to be sound.

Please note that should the Inspector deem it necessary for us to attend the Examination in Public, we would be happy to do so but our preferred method at this time would be written representations.

Summary:

This policy indicates the inclusion of Stambridge Mills as a site for very high density housing development. No evidence is provided within the consultation package that the Sequential Test and Exception Test have been applied, as required by paragraphs 14-20 of Planning Policy Statement 25. This site lies wholly within Flood Zone 3, the high risk flood zone as defined in Table D1 of PPS25 and illustrated by the flood maps produced by the Environment Agency. The site is also situated adjacent to the tidal River Roach. It does benefit from some form of flood defence but no information has been provided as to the actual level of flood risk experienced at this site in the form of a PPS25 compliant Strategic Flood Risk Assessment (SFRA). The Thames Gateway South Essex SFRA provided in the evidence base was completed under the terms of PPG25 in 2006 and as such, the climate change allowances are now outdated. Also the 2006 SFRA does not include an assessment of flood risk at this site/in this general location. We therefore also cannot be certain that the site is capable of achieving the requirements of part c of the PPS25 Exception Test - this would make it undeliverable and undevelopable as defined by Planning Policy Statement 3: Housing.

Given the information above we deem the Core Strategy unsound on the grounds that it does not demonstrate compliance with national flood risk policy as set out in PPS25 in that the Sequential Test has not been applied and there is no evidence that, should the Sequential test be passed, the proposed residential development at Stambridge Mills would be capable of passing part c of the Exception Test. Also the Core Strategy is not supported by an up-to-date SFRA as required by paragraph 12.

The lack of a PPS25 compliant SFRA and Sequential and Exception Tests document also means that we find the Core Strategy unsound on the grounds that it is not justified because it is not supported by relevant and up-to-date background evidence. We do note that that the (draft) SHLAA goes some way in attempting to justify the inclusion of the Stambridge Mills site, but in our opinion it does not go far enough.

The Core Strategy is also not consistent with national policy set out in PPS3 because Policy H1 might not be able to demonstrate the delivery of a flexible supply of land for housing if Stambridge Mills is found to be undeliverable and undevelopable. This is especially true as the Strategic Housing Land Availability Assessment (2009) Summary Schedule of Sites provided in the evidence base supporting this submission document shows the Stambridge site to be ideally developed between 2010-2012 and therefore within the five year housing supply required by PPS3.

In addition, we would argue that the Core Strategy is not sound because it is not effective. Should the Stambridge Mills site be found to be undevelopable, the Core Strategy does not explore alternatives to accommodate their required growth targets. We therefore cannot be certain that policy H1 represents the most appropriate policy because there is no clear comparison against alternatives.

Furthermore, we do not believe that the Core Strategy is supported by sufficient evidence to justify the underlying assumption that protecting greenbelt land should take preference to avoiding high density development in areas within Flood Zone 3 which would pose risks to life and property. The general approach of giving priority to brownfield land is in line with national policy within PPS3, however PPS3 also recognises the need to take into account environmental constraints and risks, including flood risk, in setting out strategies for the planned location of new housing in order to achieve sustainable development objectives set out in Planning Policy Statement 1 and that some sites might not therefore be suitable for housing (see paragraphs 38 and 41). This ties in with the process of applying the PPS25 Sequential Test and Exception Test which places flood risk classification and the vulnerability of proposed developments as the primary concern, with the designation of land as brownfield as a secondary consideration when applying part b of the Exception Test. Given that the national target of 60% redevelopment of previously developed land (as required by PPS3) is deemed unrealistic in Rochford District (paragraph 4.15 of this Core Strategy) and that Policy H2 indicates that there will therefore be a need to release greenbelt land in order to accommodate required growth in nonconformity with Planning Policy Guidance note 2, there is no justification to support the assumption that developing the brownfield land in the high risk flood zone is the most appropriate course of action given the reasonable alternative of accommodating those housing figures in areas at lesser flood risk - either by releasing a minimal additional amount of greenbelt, or by slightly increasing density of development elsewhere.

Change to Plan

In the absence of a PPS25 compliant SFRA and Sequential Test document the only option is to remove specific mention to Stambridge Mills from Policy H1 and Appendix H1 and build in flexibility to the plan in recognising the potential need to reallocate the balance of housing to more sustainable locations in Flood Zone 1, the low risk flood zone as defined by

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16846 Object

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Table D.1 of PPS25 and illustrated by the Environment Agency's flood maps. This would make the proposed policy consistent with national policy as set out in PPS1, PPS3 and PPS25. It would also remove our other concerns under the two other tests of soundness. We also consider that it would still be consistent with Policy GB1 of this Core Strategy.

If this course of action is taken, we would suggest the removal of the fourth paragraph from the policy and the following rewording of the third paragraph:

"The council will seek the redevelopment of brownfield land, including under-utilised employment areas, for appropriate alternative uses, including residential development, subject to meeting the requirements of national policy as set out in PPS1, PPS3 and PPS25. Alternative employment land will be allocated in appropriate locations as identified in Policy ED4".

In making the above changes, we feel that an updated SFRA would not be required at this stage and that a Sequential Test document could also be avoided.

Should the LPA wish to retain reference to Stambridge Mills, we would expect this Core Strategy to be supported by a PPS25 compliant Strategic Flood Risk Assessment (SFRA). This would provide clear evidence of the flood risk posed to the district upon which to base the application of the PPS25 Sequential Test. It would also provide the necessary evidence base on which to establish the likelihood that part c of the PPS25 Exception Test can be passed. Applying the PPS25 Sequential test will allow for all of the available alternatives to be properly assessed and would thereby provide clear and transparent justification of the LPAs decisions. It would also have to address the issue of prioritising brownfield development in areas of flood risk when some greenbelt land in areas of lesser flood risk is already being released. Some rewording of the policy might be necessary following the completion of these studies in order to deem policy H1 to be sound.

Appear at exam?	No	Soundness Tests	i, ii, iii
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16847 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Environment Agency (Miss Carrie Williams) [9889] **Agent:** N/A

Environment Agency
Iceni House
Cobham Road
Ipswich
Suffolk
IP3 9JD
United Kingdom
01473 706007

Full Text:

The background evidence includes the Essex Thames Gateway Water Cycle Study Scoping Report carried out by Scott Wilson and completed in March 2009 however the findings of this report have failed to be captured in the policies of the Core Strategy (with the exception of the water efficiency requirements related to the Code for Sustainable Homes in Policy ENV9).

The Scoping Report identifies that in terms of water resources, Essex and Suffolk Water are currently operating at a demand-supply deficit during dry years and that, although the approval of the Abberton reservoir scheme will largely alleviate these problems in the future, the deficit will remain until this scheme comes online in 2014. The Scoping Report therefore recommends that, as well as seeking high levels of water efficiency in new and existing developments, new development is phased up to 2014.

In addition to the water resources issue, the Scoping Study also that there are some potential capacity issues with both the Rochford Wastewater treatment works (WwTW) and the sewerage network associated with it which would need resolving around 2015. There might also be some issues with the quality of discharge from the Rayleigh East WwTW which will require further investigation but could be exacerbated by unphased growth.

In terms of water quality, the three WwTWs serving Rochford District - Rochford, Rayleigh East and Rayleigh West - discharge to tributaries of the Rivers Roach and Crouch which are Shellfish Waters and flow into areas designated under national and international environmental legislation (SSSI, SPA and Ramsar designations) and the water quality of these watercourses is generally poor. Page 48 of the Scoping Study states that further development draining to these three WwTWs has the potential to exacerbate the problem. Again further investigation is required into this issue.

In not addressing the findings of this report we deem the Core Strategy to be unsound in that it is not effective. This is because we do not believe that the Policies set out in the Core Strategy have clearly identified the infrastructure implications of the strategy and the delivery mechanisms and timescales for implementation have not been addressed. There is also an element of inflexibility in failing to recognise the findings of this report and the potential impact on growth delivery.

In order to make the Core Strategy sound, it must incorporate the findings of the Water Cycle Study Scoping Report and recognise the potential constraints to development delivery.

Referring to the report in Policy H1 would be an option. At this stage in the process we would consider it sufficient to include a statement about the intention to phase development in line with the findings of the Scoping Report and subsequent Outline and Detailed Stage Water Cycle Studies. The Site Allocations DPD would require more detailed information to inform the phasing so as to avoid bringing forward sites prematurely.

Please note that should the Inspector deem it necessary for us to attend the Examination in Public, we would be happy to do so but our preferred method at this time would be written representations.

Summary:

The background evidence includes the Essex Thames Gateway Water Cycle Study Scoping Report carried out by Scott Wilson and completed in March 2009 however the findings of this report have failed to be captured in the policies of the Core Strategy (with the exception of the water efficiency requirements related to the Code for Sustainable Homes in Policy ENV9).

The Scoping Report identifies that in terms of water resources, Essex and Suffolk Water are currently operating at a demand-supply deficit during dry years and that, although the approval of the Abberton reservoir scheme will largely alleviate these problems in the future, the deficit will remain until this scheme comes online in 2014. The Scoping Report therefore recommends that, as well as seeking high levels of water efficiency in new and existing developments, new development is phased up to 2014.

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In terms of water quality, the three WwTWs serving Rochford District - Rochford, Rayleigh East and Rayleigh West - discharge to tributaries of the Rivers Roach and Crouch which are Shellfish Waters and flow into areas

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16847 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

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In not addressing the findings of this report we deem the Core Strategy to be unsound in that it is not effective. This is because we do not believe that the Policies set out in the Core Strategy have clearly identified the infrastructure implications of the strategy and the delivery mechanisms and timescales for implementation have not been addressed. There is also an element of inflexibility in failing to recognise the findings of this report and the potential impact on growth delivery.

Change to Plan In order to make the Core Strategy sound, it must incorporate the findings of the Water Cycle Study Scoping Report and recognise the potential constraints to development delivery.

Referring to the report in Policy H1 would be an option. At this stage in the process we would consider it sufficient to include a statement about the intention to phase development in line with the findings of the Scoping Report and subsequent Outline and Detailed Stage Water Cycle Studies. The Site Allocations DPD would require more detailed information to inform the phasing so as to avoid bringing forward sites prematurely.

Appear at exam? No

Soundness Tests ii

Core Strategy Submission Document

O - 16864 - 8318 - Policy H1 - The efficient use of land for housing - i, iii

16864 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Mrs E Byford [8318]

C/o Agent Stutt & Parker
Coval Hall
Chelmsford
Essex

CM1 2QF

Agent: Strutt & Parker (Mr Trevor Dodkins) [8117]

Strutt & Parker
Coval Hall
Rainsford Road
Chelmsford
Essex

CM1 2QF

01245254603

Full Text:

Please see attached statement.

Council ref AE25

Summary:

Please see attached statement.

Council ref AE25

Change to Plan

Please see attached statement.

Council ref AE25

Appear at exam? Yes

Soundness Tests i, iii

Core Strategy Submission Document

S - 16873 - 8329 - Policy H1 - The efficient use of land for housing - None

16873 Support

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Swan Hill Homes Limited [8329]

Swan Hill Homes Limited
C/O Agent
Mr P Kneen
Charles Planning

Agent: Charles Planning Associates Ltd (Mr P Kneen) [5040]

Charles Planning Associates Ltd
1644-1645 Parkway
Solent Business Park
Whiteley
Fareham
Hampshire
PO15 7AH
01489 580853

Full Text:

1.0 Instruction and Introduction

1.1 Charles Planning Associates Limited (Chartered Town Planners) is Instructed by Swan Hill Homes Limited (Swan Hill) to prepare and submit representations on their behalf in respect of the Rochford District Local Development Framework: Core Strategy Submission (September 2009) Development Plan Document.

1.2 The comments refer to the relevant sections and policy designations in the Submission document, as appropriate.

1.3 The comments set out in this submission are intended to assist the District Council in taking forward its Local Development Framework. It is our intention to continue to be involved in the LDF preparation process and we look forward to the opportunity to comment further at the Examination to the Core Strategy.

1.4 If you have any queries regarding the content of this submission then please do not hesitate to contact:

Peter Kneen BSc (Hons) MSc MRTPI
Planner

2.0 Housing:
Policy H1 - The Efficient Use of Land for Housing

2.1 Swan Hill recognises the importance of seeking to concentrate new developments mainly in the existing urban areas, on previously developed land where possible, particularly in view of the Government seeking to ensure 60% of all such new developments are on previously development land (PDL).

2.2 However, given the character of the District, and the strategic housing requirement of the East of England Plan, Swan Hill supports the approach that the Council must also make provision for additional development on the edge of existing settlements on greenfield sites, particularly in the most sustainable locations. As such, Swan Hill supports that where feasible, the redevelopment of existing employment sites for residential/employment purposes can make a contribution towards the strategic housing requirement, provided that sufficient additional employment land is brought forward to ensure the stability of employment levels in the District, and to ensure employment growth meets the East of England Plan requirements.

2.3 Swan Hill considers that Policy H1 should include consideration that new extensions to existing settlements have regard to their potential impact on the wider characteristics and openness objectives of the Green Belt.

Policy H2 - Extensions to Residential Envelopes and Phasing

2.4 Swan Hill generally supports the approach taken by the Council in this policy. As set out above, Swan Hill consider the Council's acknowledgment that housing requirements should be met through the allocation of land on the edge of the existing settlements is the most suitable way forward to meeting the Council's strategic housing requirement and complies with the advice in PPS3.

2.5 The need for suitable greenfield urban extensions represents the best way forward for the Council to meet its strategic housing requirement, as set out in the East of England Plan. Swan Hill supports the recognition that the potential supply of alternative previously developed sites is limited, without detrimentally affecting the character of the District, and therefore the best way forward is the use of sustainable greenfield urban extensions to the existing settlements of the District.

2.6 However, Swan Hill consider that a fundamental consideration that the District Council should consider relates to the potential impact of the urban extensions on the Green Belt policy has been somewhat overlooked. The wider sustainability credentials of the settlements of the District should only be one of many key considerations for determining the level of expansion. In view of the proximity of Southend-on-Sea to all the main settlements of the District, and the influence this has on the likely location many people would travel for employment and leisure, sustainability of many of the settlements is not a key overarching factor, and greater weight should be placed on the potential impact on the openness of the Green Belt, as this cannot be remedied if development occurs in the wrong location.

2.7 As such, Swan Hill considers that determining the location of growth for the main settlements should be to identify

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S - 16873 - 8329 - Policy H1 - The efficient use of land for housing - None

16873 Support

CHAPTER 4 Policy H1 - The efficient use of land for housing

those locations where the impact on the wider setting of the Green Belt can be minimised. Further justification for those general locations chosen should be identified in Policy H2. In this regard, Swan Hill has serious concerns regarding the removal of Land South West of Great Wakering as a viable option for the growth of the settlement. The development of this area of Great Wakering, in addition to the potential redevelopment of the Star Lane Industrial Estate could provide a more comprehensive development, whilst ensuring that the wider openness of the Green Belt is maintained. Land South West of Great Wakering is significantly better placed to limit the impact on the wider Green Belt than Land West of Great Wakering, and could contribute to the provision of an important amenity and wildlife site for the local community.

2.8 In addition, Swan Hill consider that the Council now has no reserve provision in the event that any of the existing employment sites set out in Policy H1 fail to come forward for development within the envisaged timescale. Further, Land West of Great Wakering has not been identified in the SHLAA as a deliverable site to help meet the strategic housing requirement, contrary to the requirement set out in PPS3.

2.9 As such, Swan Hill would support the provision of suitable sites which could be safeguarded for future development in the likelihood of a shortfall in supply.

Policy H3 - Extensions to Residential Envelopes Post 2021

2.10 As set out above, Swan Hill supports the overall approach the Council has taken towards the provision of sustainable urban extensions as a suitable means of meeting their strategic housing requirement. However, as set out for Policy H2 above, Swan Hill has serious concerns regarding the removal of several proposed sites set out in the October 2008 Preferred Options Core Strategy, without any guarantee of the ability to deliver those sites set out in Policy H1.

2.11 As also considered above, the inclusion of West of Great Wakering for 250 dwellings should not be included ahead of South West of Great Wakering, in view of the fact that the site is not identified in the SHLAA as available, suitable and achievable as required by PPS3, and thus is not supported by a robust and creditable evidence base for its inclusion as a strategic site for development.

2.12 Whilst Swan Hill acknowledge that alterations to Policy H1 has resulted in the removal of some locations for growth in Policy H3 (as set out in the Sustainability Appraisal), Swan Hill does not consider that the most appropriate locations have been chosen.

2.13 In addition to the matters raised above, the use of West of Great Wakering would also result in the loss of valuable agricultural land, which clearly in a Green Belt location, should be less suitable for development than other sites, such as South West of Great Wakering, which would have limited impact on the wider Green Belt policy, and not result in the loss of valuable agricultural land.

2.14 Finally, in respect of Policies H1, H2 and H3, all of the above comments are based on our interpretation of the Submission Version Core Strategy when compared to the October 2008 Version of the Core Strategy. Without the ability to undertake a detailed assessment of the Council's SHLAA, it is not possible to clarify the proposed Core Strategy position regarding the proposed direction of growth proposed for the settlements in the District. As such, Swan Hill reserves the right to make additional representations regarding the proposed Policies H1, H2 and H3 following the publication of the SHLAA in due course.

Policy H4 - Affordable Housing

2.15 In general terms, Swan Hill supports the approach taken by the Council towards the provision of affordable housing for new residential developments. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H5 - Dwelling Types

2.16 Swan Hill supports the policy provision of H5, and considers that the approach taken by the Council for this policy represents a suitably flexible alternative to stipulating percentages of dwelling mix, sought by some local authorities. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H6 - Lifetime Homes

2.17 In regard to this policy, Swan Hill objects to the Council's policy where all new dwellings should be provided to the Lifetime Homes Standard. Whilst it is acknowledged that the UK has an aging population, Swan Hill considers that seeking to provide Lifetime Homes on all sites is considered to be overly onerous for proposed developers, particularly when considering the requirement for all car parking spaces to be suitable for disabled users, which could result in more schemes becoming unviable. Therefore, the provision of a percentage of Lifetime Homes should be considered through negotiations with the Council at the planning application stage, and should be determined on a case-by-case basis.

3.0 Character of Place: Policy CP1 - Design

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CHAPTER 4 Policy H1 - The efficient use of land for housing

3.1 The Town and Country Planning (General Development Procedure) Order 1995 (As Amended) makes the submission of a Design and Access Statement for most types of planning applications a Statutory requirement, and as such, the provision of a Design Brief represents a pre-requisite of all major planning applications.

3.2 Policy CP1 seeks to ensure the provision of good, high quality developments that reflect local characteristics and distinctiveness, this ideology is supported by Swan Hill.

4.0 The Green Belt:
Policy GB1 - Green Belt Protection

4.1 Following the amendments to the wording of the Policy since the October 2008 Preferred Options Core Strategy, Swan Hill is now generally supportive of Policy GB1 and its supporting text. However, as expressed above, it is important that where alterations to the Green Belt boundary occur as a result of the extension of the settlements to meet the strategic housing requirement, both the minimal amount of land is taken and where that land is taken for development, it represents the best available land which has a minimal impact of the wider openness characteristic of the Green Belt.

5.0 Environmental Issues:
Policy ENV3 - Flood Risk

5.1 Swan Hill generally supports the approach set out in Policy ENV3 regarding ensuring development accords with the sequential test of PPS25. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV4 - Sustainable Drainage Systems (SUDS)

5.2 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV4. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV8 - On-site Renewable and Low Carbon Energy Generation

5.3 Whilst Swan Hill recognises the importance of reducing carbon emissions, particularly in new housing developments, and the role this can play in reducing the nations overall Greenhouse emissions. As such Swan Hill is generally supportive of Policy ENV8. It is noted that Policy ENG1 of the East of England Plan sets out a threshold of developments comprising 10 or more dwellings. Swan Hill consider it important for the District Council to justify the reduction in the threshold level.

5.4 Further, no assessment of Policy ENV8 has been set out in the Sustainability Appraisal which justifies the change in threshold from that of Policy ENG1 of the RSS.

Policy ENV9 - Code for Sustainable Homes

5.5 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV9. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

6.0 Community Infrastructure, Leisure and Tourism:
Policy CLT1 - Planning Obligations and Standard Charges

6.1 Swan Hill generally supports the overall approach the Council has taken in Policy CLT1. It is considered Policy CLT1 sets out a degree of flexibility to ensure that all sites are considered on a site-by-site basis, assessing the individual merits of each planning application, in order to ensure the levels of contributions applicable meet the five tests of Circular 05/05. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policies CLT5 - Open Space;
CLT7 - Play Space;
CLT8 - Youth Facilities; and,
CLT10 - Playing Pitches

6.2 Swan Hill supports the need for new residential developments to incorporate a degree of new publicly accessible open space, children's play space, youth facilities and playing pitches, and as such, generally supports the policy approaches taken by the Council.

6.3 However, it is important that whilst the Council may seek to undertake an assessment of providing standard charges for new development, which, as set out in Policy CLT1, this should be based on thorough public consultation and consideration and sound justification. Swan Hill consider that within the provision of a standard charge, it is important that such provision allows for a degree of flexibility to ensure that each site is assessed individually and on its own merits. This is particularly important for those sites close to existing open spaces and facilities. As such, the levels of

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open space and recreation facilities required in the 'standard charge' should be based on an up-to-date PPG17 Open Space assessment, which should be used to form a key consideration in the levels of provision likely to be required in the standard charge system proposed.

7.0 Transport: Policy T1 - Highways

7.1 Swan Hill supports the overall objectives set out in Policy T1 requiring developments to be located and designed to reduce the reliance on the private car and to meet the infrastructure needs generated by development or seek to help achieve these needs is acceptable in principle.

7.2 Swan Hill recognises the importance of providing sufficient infrastructure provision to meet the requirements of development, and that where developments have insufficient consideration of impact on existing infrastructure, they should be considered unacceptable and contrary to National policy guidance. However, Swan Hill considers it important to emphasise that the developer's role should not be seen as a means to meet existing shortfalls in provision.

Policy T3 - Public Transport

7.3 Swan Hill is generally supportive of the policy approach set out in T3, however, as set out in paragraph 7.2 above, it is important that the District Council do not consider that it is the developer's responsibility to resolve existing shortfalls in provision of public transport, and any contribution towards additional public transportation provision should only be to mitigate against the additional level of demand likely from the development proposed.

Policy T5 - Cycling and Walking

7.4 Swan Hill supports the general approach to this policy, as Swan Hill recognises the importance of promoting the use of alternatives to the private car. The policy provision acknowledges the need to ensure relevant contributions in the event of additional travel demands generated by individual developments, whilst also setting out additional aspirations for the cycle network in the District.

7.5 As such, Swan Hill considers this policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy T8 - Parking Standards

7.6 The Council has recently (January 2007) adopted SPD on the requirements for parking standards, and as such, Swan Hill generally supports the policy approach chosen by the Council. As set out in the SPD, whilst Swan Hill generally supports the approach taken by the District Council towards setting residential parking standards, in that the Council has recognised that in the suburban areas, even with some access to public transport, the majority of residents will rely on the use of private cars. However, Swan Hill has concerns over the failure of the District Council to comply with the provisions of PPG13: Transport (2001) which sets out that Local Planning Authorities should not set minimum standards for car parking. Whilst it is acknowledged that PPS3 sets out provision for the consideration of local circumstances, it is considered that the Council has not justified this deviation from PPG13's maximum standard.

7.7 Whilst it is acknowledged that such justification may become apparent through the work currently being undertaken by Essex County Council, until such time, the District Council should only seek to apply the maximum standards indicated in PPG13. However, Swan Hill recommends that the District Council make provisions in the wording of the Policy to allow for changes in the event that future policy on car parking standards need to reflect the County standard, following the completion of the County Council review.

8.0 Economic Development: Policies ED3 - Existing Employment Land ED4 - Future Employment Allocations

8.1 In respect of Policies ED3 and ED4, Swan Hill notes that they have changed considerably since the October 2008 Preferred Options document, in that they are site specific regarding the location of the proposed redevelopment of existing employment sites. These four sites are also identified in Policy H1 - Efficient Use of Land, and in general, Swan Hill supports the approach to the redevelopment of these sites (where feasible) based on the assessments of the sites set out in this version of the Core Strategy.

8.2 However, Swan Hill has concerns that these policies might not be considered suitably sound given that insufficient opportunity has been allocated for consultation on their redevelopment. Without the SHLAA being publically available prior to the consultation on this Core Strategy, an insufficient evidence base has been provided to corroborate that these sites are neither suitable or deliverable to meet the test of soundness requirements.

Summary: Policy H1 - The Efficient Use of Land for Housing

2.1 Swan Hill recognises the importance of seeking to concentrate new developments mainly in the existing urban areas, on previously developed land where possible, particularly in view of the Government seeking to ensure 60% of all

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S - 16873 - 8329 - Policy H1 - The efficient use of land for housing - None

16873 Support

CHAPTER 4 Policy H1 - The efficient use of land for housing

such new developments are on previously development land (PDL).

2.2 However, given the character of the District, and the strategic housing requirement of the East of England Plan, Swan Hill supports the approach that the Council must also make provision for additional development on the edge of existing settlements on greenfield sites, particularly in the most sustainable locations. As such, Swan Hill supports that where feasible, the redevelopment of existing employment sites for residential/employment purposes can make a contribution towards the strategic housing requirement, provided that sufficient additional employment land is brought forward to ensure the stability of employment levels in the District, and to ensure employment growth meets the East of England Plan requirements.

2.3 Swan Hill considers that Policy H1 should include consideration that new extensions to existing settlements have regard to their potential impact on the wider characteristics and openness objectives of the Green Belt.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

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O - 16917 - 10009 - Policy H1 - The efficient use of land for housing - i

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Full Text: Local Development Framework

Representations on the Core Strategy
Submission Document, November 2009
On behalf of Barratts Eastern Counties

Introduction

The requirements of Core Strategies are enshrined in the 2004 Planning and Compensation Act, the Town & Country Planning (Local Development) England (Regulations) 2004 and the 2008 policy guidance in PPS12. The requirements of Coe Strategies are clear. And they are legal requirements. The Core Strategy must comply with the Local Development Scheme, Statement of Community Involvement and the Regulations. The Core Strategy must be subject to a sustainability appraisal, have regard to national guidance, conform generally with the Regional Spatial Strategy and have regard to any Sustainable Community Strategy. A Core strategy must be sound - justified, effective and consistent with national policy. The following representations therefore focus on these legal requirements.

HOUSING

Paragraph 4.6 - Evidence Base

To meet the soundness test Submission Core Strategies (SCS) must be justified, that is to say it must be founded on robust and credible evidence base and comprise the most appropriate strategy when considered against reasonable alternatives. The housing strategy in as far as it identifies a need for Green belt sites is sound, however, there are other elements which are unsound.

Paragraph 4.6 notes that the Strategic Housing Land Availability Assessment (SHLAA) has examined the supply of housing. It is presumed that the Table at paragraph 4.6 is the outcome of this examination. Whilst the SHLAA has some legitimacy in that it identifies various sites that are apparently available, we are concerned that because the SHLAA was only published in November 2009 it post dates the SCS. This implies that the SCS is driving the SHLAA exercise rather than the other way round. Whilst this may have no real practical effect on the outcome of the SCS and the identified need for Green Belt sites, the Inspector will be mindful of the advice in paragraphs 33 and 54 of PPS3 that SCS draw on the evidence in SHLAA. It may be that the SCS should explain how the evidence base has been used to justify the strategy.

PPS12 explains at paragraph 4.37 that Core Strategies are based on thorough evidence. Since the SHLAA has only recently been published it is considered that the SCS is unsound as it is not justifiable. This, together with other comments on the SCS, indicates that the process should be delayed to ensure that a more robust document is placed in front of the EiP Inspector.

Table at Paragraph 4.6 - Evidence base

From our review of the available evidence it would appear that the housing land supply is insufficient and that Green Belt release are required. From the wider strategy being promoted we note that some of the sites that the District Council consider to be 'appropriate' are likely to relate to existing employment areas. As set out elsewhere in our representations, we maintain severe reservations that the redevelopment of existing employment sites for alternative uses and particularly the Eldon Way Industrial Estate is unsustainable. We will make reference to the effectiveness of this strategy in relation to sustainability, whether it is justified in the context of National Policy and the deliverability of such a strategy elsewhere.

In particular, paragraph 11.32 of the SCS refers to existing employment land and sites within the UCS. It does not refer the SHLAA and as such it appears that an evidence base to support the re-use of employment land for residential is not reported in the SCS.

Having reviewed the 2008 Annual Monitoring Report, as we did when commenting on the 2008 Preferred Options Core Strategy, we maintain severe doubts as to the appropriateness of some of the previously developed sites identified as potential housing sites and their expected housing yield. Whilst we cannot at this stage ascertain whether the SHLAA

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sites referred to in this table correlate with the Annual Monitoring Report and indeed the 2007 Urban Capacity Study, it is our view that there will be some commonality and so the reliance on these sites is likely to be at odds with Government Policy. We shall elaborate on this objection in relation to the specific housing policy below.

We note that the last two rows in the Table at paragraph 4.6 set out figures with and without Green Belt releases. The text to this section of the Core Strategy should, for reasons of clarity, explain that Green belt review will be necessary in order to deliver the required housing.

Paragraph 4.9

The table on page 40, which sets out the settlement tiers, is supported. Rayleigh, Rochford/Ashingdon, Hockley/Hawkwell are clearly the largest settlements in the District and they benefit from good employment, housing, leisure, community and public transport provision. These settlements are the most sustainable ones with the greatest mix of uses. Consequently, it is sensible that the Core Strategy identifies these as top tier settlements and is able to target them with growth accordingly. This component of the strategy is justified by reference to sustainability data and is effective, since targeting development at these locations will ensure a more sustainable pattern of development.

Paragraph 4.14

We maintain that the strategy for redeveloping the Eldon Way Industrial Estate for housing and other alternative uses to employment is unsound. It is neither justified nor effective. The Industrial Land Availability Study 2006 sets out on page 7 strategic objectives. The 3rd objective seeks to Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive. Clearly the strategy as currently drafted envisages major changes to existing industrial estates, including alternative uses. This strategy is not consistent with other strategies and evidence based studies and so cannot be justified in the context of the tests set out in PPS12. It is also an ineffective strategy since the new employment locations that would free up the Eldon Way site for redevelopment relies on transport infrastructure that has no certainty of being delivered. Principally, the erosion of employment uses at Eldon Way could make the settlement of Hockley/Hawkwell less sustainable and thus conflict with the tiered approach on page 40, paragraph 4.9.

Policy H1

Prioritising the use of previously developed land ("pdl") is supported in principle. It is a justified strategy in the context of PPS3 and effective as sequential choices can be made by implementing the policy. However, the District Council is also promoting a strategy which seeks the redevelopment of existing employment locations to alternative uses and by consequence is identifying green field sites for new employment development elsewhere (Policy ED4 refers). This 'land swapping' is not considered consistent with PPS3, nor is it considered to be justified or effective in delivering the desired strategy. This is particularly the case as most of the existing employment sites are occupied and therefore unavailable for redevelopment. In addition, the new Greenfield sites are in an arguably less sustainable locations away from the top tier settlements identified on page 40 of the Submission Core Strategy. Clearly this element of the strategy is inconsistent with the wider strategy.

The Industrial Land Availability Study 2006 is included as an evidence base by the District Council. It includes an introductory section, which explains that the authority wishes to make Rochford the place of choice for new business. It includes several strategic objectives on page 7 including "Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive." It reviews existing employment areas and identifies vacant land, including land available from allocations. It does not include any assessment of new sites or potential opportunities for new sites that might have been expected to feed into the Core Strategy. The strategy for identifying Green Belt site employment allocation does not appear to be based on any evidence in this document and in that context cannot be justified. The strategy being promoted potentially conflicts with Government policy in PPG13, PPG2 and emerging PPS4.

The Employment Land Study 2008 is a much later document. It has a key recommendation on page ii "we recommend that Rochford District Council adopts strong policies to protect existing employment land." Furthermore under recommendations for existing sites on page iii-iv of that document it states "In our view, Hockley Trading Centre is a strategically well placed employment location. However, we recognise the ambitions of the Hockley Town Centre masterplan and that within this the Council should consider it to be allocated for other uses. However, we recommend that this reallocation happen only if provision is made within the masterplan for office use within Hockley Town Centre as part of a mixed use scheme." The view of the writers of this document is clear - the Eldon Way Industrial estate (Hockley Trading Centre) is a good employment site and that it is for other reasons that alternative uses are being considered and only then if office development is supported. This supports our representations that new future uses at the Eldon Way site should be employment dominated and that alternative uses should relate to the objectives of the Town Centre which is to enhance the shopping and leisure facilities. Residential is not an appropriate alternative.

This document recommends the use of land to the west of Rayleigh for employment and envisages Green belt release. However, the SCS does not explain through the evidence base why existing employment sites should be 'deallocated' and Green belt land unnecessarily used.

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In addition to these key issues we have some specific concerns. As a consequence we maintain an objection to the second paragraph of Policy H1. This policy states that the Council will seek the redevelopment of various industrial estates including Eldon Way. The Policy says that alternative uses will be sought (presumably alternative to the existing employment offer) and that new land will be allocated elsewhere. This policy statement, in relation to Eldon Way in particular, is unsound for a number of reasons:

The emerging Hockley Area Action Plan consulted upon in 2008 states that the Eldon Way Industrial Estate is strategically well placed. In a sense this statement underplays the true importance of this highly sustainable employment location and only major employment area in Hockley/Hawkwell. The employment area is adjacent to the railway station and located a short distance from the main bus routes that run along Spa Road. Some of the residential areas of the town are also within walking distance of this commercial area, thus providing a potential for sustainable travel by employees. The Eldon Way Industrial Estate is therefore right at the heart of the settlement of Hockley/Hawkwell and provides an opportunity to meet sustainable transport objectives by reducing the need to travel by car. Consequently, this employment area should be highlighted as a premier employment site in sustainability terms, both in the context of PPG13, PPG4 and PPS6. To encourage alternative uses as set out in Policy H1 implies the removal of the majority of employment based activity at Hockley/Hawkwell and this would be contrary to National policy, would not be the most appropriate strategy when considered against alternatives and is therefore unsound.

Whilst it is acknowledged that improvement to the Eldon Way Industrial Estate can and should take place, the extent to which the mix of employment uses should be altered in favour of alternative land uses requires careful consideration. It is our view that a mix of existing or indeed new employment land uses with some Town Centre type uses should dominate the Eldon Way site. A mix of employment types between offices, light industry and other high technology industries should be encouraged as this will provide many locational advantages to the firms that agglomerate together. The Council says that the existing uses on this site are harmful to amenity. However, the site has operated for many years without any significant issues and if renewal for B1 type uses are encouraged then the employment area can be maintained without harm to amenity. Renewal of the employment stock can help develop and improve trade, improve the sustainability of businesses as a whole and make for a more flexible labour market as skill levels are varied. A singularly different use altogether or a variety of uses which excludes employment could undermine the long term sustainability of the area and Town Centre. As such Policy H1 is not an effective strategy and should be amended to acknowledge the importance of Eldon Way and the need to renew the employment stock to ensure that the site maintains its important role as a employment site, albeit with some ancillary alternative use development where appropriate.

The 2008 Retail Study notes that Hockley Town Centre is not strong and there is trade leakage. Eldon Way Industrial Estate provides a customer base for existing town centre uses. Weekday spending within town centres is an important contributor to the viability of many retail and leisure businesses either through expenditure by employees during the lunchtime trade or expenditure by employers, on necessary goods and services. This relationship helps sustain the critical mass of a centre and provides a platform for new retail and leisure growth. It is important to have a balanced centre with a variety of uses. Policy H1, as currently drafted, implies the removal of employment related development and this is likely to harm the vitality and viability of Hockley Town Centre. The Council has presented no evidence to suggest that this is not the case. Importantly, the 2008 Retail Study explains that there is a need for additional retail and office space. In principle we would support additional office and other B1 type uses plus retail but employment uses should always dominate for the sustainability reasons given above. Retail and office development are likely to present a viable alternative to some of the more industrial type uses.

Consequently, we do not support the phrasing of the third paragraph of Policy H1 and maintain that the most appropriate strategy is to seek renewal of the employment stock with employment based uses and with some new retail development. Removal of employment land uses completely as currently implied-which was the approach adopted in the emerging Hockley Area Action Plan - is not a justifiable strategy.

One of the key tests of a Core Strategy is consistency between policies in the emerging Plan and this strikes at the heart of demonstrating an effective strategy. Policy H1 implies alternative uses to employment and the relocation of Eldon Way to a site identified under Policy ED4. However, Policy RTC6 sets out a suite of policy criteria for Hockley Town Centre which includes employment and commercial activities. In addition Policy ED3 seeks the protection of sustainable employment sites (Eldon Way) and notes that some reallocation of existing employment sites will include a proportion of employment. It notes that in the case of Eldon Way employment development will form a component. The policies appear at odds with one another. The third paragraph of Policy H1 should be deleted as the second paragraph is sufficient to set a strategic context for delivering new housing development. The employment policies and Hockley specific policies should be left to consider the type and quantum of land uses appropriate in the area. If the third paragraph of H1 is to be retained then it should tie in more with Policy RTC6 and in our view explain that employment uses should dominate any redevelopment proposals for the Eldon Way site and that retail and leisure uses should be a supporting proportion.

Implementation, Monitoring and Delivery - page 132 onwards

One of the key tests of soundness is that the Core Strategy should be effective - it should be able to deliver its strategy. The Implementation strategy set out at page 132 onwards of the Core Strategy does not explain how Policy H1, RTC6 and the strategy for redeveloping Eldon Way (Policy ED2 and ED3) will be delivered. The comment at Policy ED3 on

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page 161 identifies it as a potential risk and alludes to land assembly difficulties and the choices to be made by owner/occupiers. In order to deliver the strategy there should be a clear understanding as to whether the new land use values being promoted are sufficient to encourage relocation voluntarily. Secondly there is a need for more information to be gathered and presented to show that current occupiers and landowners are willing to relocate and the timescales likely for this. For example, do the building lease contracts enable early review or are there any break out clauses. There should be some commentary on whether the Council will engage in compulsory purchase orders to pursue their strategy should the 'encouragement' route fail. As currently drafted there is no clear path to deliver the strategy and the danger is that despite reallocation, the sites identified for redevelopment will not come forward in the plan period. In this regard, evidence to satisfy the test of soundness is not provided.

Policy H2 - General Locations

We support the strategy that new housing growth should be targeted at land South of Hawkwell. This area is suitably located to the urban area of Hockley/Hawkwell and to tie in with the settlement tiers on page 40 of the Submission Core Strategy the same terminology for settlement should be used. This ensures a consistency within the SCS. The choice of this location as a housing growth area is appropriate as it would not contribute to the coalescence of the urban area with Ashingdon (there is existing development between this identified housing area at Rectory Road and Ashingdon and moreover, Rectory Road can form a natural physical boundary for the new Green belt boundary. This area is also well located to the existing road network. Cherry Orchard Way has recently been improved and provides much better accessibility to the proposed housing growth area than any other location around Hockley/Hawkwell. The existing bus routes along Rectory Road also make this location sustainable and the additional housing proposed will help underpin the financial viability of bus routes in this area. Locally there are employment opportunities, including the small commercial estate off Main Road. The Eldon Way Industrial Estate adjacent to the Town Centre also provides the opportunity for employment locally. Extensive public open space, play pitches and built leisure facilities are located just to the north of this area and a community hall is located off Briar Close, nearby. The area to the south of Hockley/Hawkwell is close to local shops on the corner of Heycroft Road and Main Road and there are numerous footpath links between this area and the local community including links via Thorpe Road, Thorpe Close, Briar Close, Hawkwell Park and Park Gardens. The area therefore provides the opportunity to enhance existing links, including cycle links, and contribute towards community integration - more so than other sites on the south side of this settlement. The site is also in the control of one house builder and deliverable.

However, we find that the Policy is not fully consistent with national policy and furthermore needs to be reviewed in order to be justified and effective. We have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with this policy and feel that Green Belt review should be more explicit throughout the SCS. We note that it is only Policy H3 which indicates the need for Green Belt land review. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H2 and certainly Policy H3 and Policy GB1 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary.

Policy H2 - Phasing and Quantum

The 2008 Preferred Core Strategy document indicated that the area south of Hawkwell should deliver 330 dwellings over a phasing period to post 2021 (see Policy H2 and H3 of that document). The SCS reduces the quantum of housing in this area to 175 but expects delivery by 2015. At a broader level the Preferred Options Core Strategy of 2008, (Policy H2) required 1,450 dwellings to 2015 and a further 1,050 by 2021. In the SCS the figures are now 775 and 1,010 respectively.

Since the SHLAA post dates the publication of the SCS, we are uncertain as to the reason why such a significant reduction in quantum of housing and extensions to the residential envelope is considered necessary. Presumably it is the 'new' strategy to redevelop existing employment areas within the settlements that has led to this change. Our representations on this strategy and specifically the Eldon Way Industrial Estate are included elsewhere within our representations. Previously we have commented on the Table at paragraph 4.6 of the Submission Core Strategy and the lack of evidence to underpin that table. It seems odd that in the space of a year the expected requirement for Greenfield sites has effectively halved on the basis of a SHLAA exercise. The community is therefore not able to effectively

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comment on the housing land supply and at this stage the Submission Core Strategy is legally unsound.

That said, we are of the view that the quantum of housing envisaged south of Hockley/Hawkwell should be more than the 175 currently envisage. In coming to this view we have reviewed the Urban Capacity Study and the latest housing figures in the Annual Monitoring Report 2008. We conclude that the shortfall in housing land supply is such that 330 dwellings in this location is appropriate.

The recently published SHLAA is based upon the data obtained from the Urban Capacity Study 2007, a call for sites exercise and data from the Annual Monitoring Report 2008.

The 2007 Urban Capacity Study (UCS)

1. 2007 is widely recognised as being the peak level of house prices in the UK and it was acknowledged by Government and practitioners alike that 2007 house prices were at an unsustainable level. It is our view that utilising the 2007 UCS as an evidence base without reference to the market does not pick up the depressed demand that is likely to now exist. Recent corrections to the housing market now mean that housing land prices are at a much lower and arguably more affordable level than before. The implications are that some pdl may not be viable for housing development. Often brownfield sites have much higher development costs than Greenfield sites and so the yield from urban capacity will be much lower than anticipated in the 2007 study. One example is the employment allocation of the Adopted Local Plan located at 76-92 Main Road, Hawkwell. This site has been allocated for several years and has been available during the most recent rises in residential property prices during 2006-07. As a consequence the lack of progress on the site can only be described by its current occupancy and perhaps it comprises high value uses that do not encourage redevelopment. Despite this the site is identified as having high potential for alternative use and high potential demand. The SHLAA form notes that there is no information on legal constraints (e.g., tenancy agreements) As a consequence it is difficult to see how this could continue to be a potential site and as a consequence the allowance for green field releases should be increased.

2. There are considered to be other instances in the UCS and the recently published SHLAA where the assumptions and calculations would indicate that the 1301 urban capacity figure is over optimistic and the SHLAA assessment is limited. In the assessment of 'non-residential sites in appropriate locations' within the UCS assumptions are made as to the probability of sites coming forward for new housing. 68-72 West Street, Rochford is identified as a high probability site but we note that it has been subject to 7 refusals of planning permission/conservation consent. There is a significant gap between the urban capacity identified as being suitable by the Council and the capacity applied for by the owners. Given its alternate use value, it is debateable whether the two capacity figures can be reconciled. No 247 London Road is another example of a site allocated in the Local Plan but which hasn't come forward. This is now the subject of a proposal for a care home and if approved would further limit the scope for market/affordable housing capacity on the site. A striking example of how the urban capacity study has underestimated is also evidence by 2-4 Alderman's Hill, Hockley - described as a disused service station. There has been no residential development application on this site since 2004 and most recent applications have sought commercial use of the site. Rather than being evidence of housing land deliverability, this particular site evidences the need for commercial uses in the area. There are therefore deliverability doubts over these 'high probability' categories which amount to some 40 units.

3. In relation to the assessment in the UCS entitled 'intensification of existing residential uses' we note that the assessment is premised on an assessment of recent trends taking into account net completions between 2001-2006 and 2005-06. This is effectively an assessment of windfall trends and not an approach that PPS3 encourages. Importantly Table 3-12 in the urban capacity study seeks to project forward urban capacity from residential redevelopment - a period that benefited from high house prices and PPG3 guidance encouraging redevelopment. These two circumstances have markedly changed and so the assumptions and conclusions drawn would also have changed. Even taking into account the UCS discounting, the reliability of the 404 units from this source must be questioned and in our view the 1301 figure cannot be a sound basis for urban capacity and further Greenfield releases are necessary.

4. In the section of the UCS entitled 'subdivision of dwellings' and 'living above the shop' it is estimated that recent trends would result in 7 and 15 units. Our concerns with using trends as a basis for urban capacity are detailed above - PPS3 does not encourage this. Rather, local authorities are charged with surveying their areas, identifying which areas may yield urban capacity and how much and developing policies to achieve that. Government guidance does not encourage the estimation of windfalls in the way the UCS does.

5. Redevelopment of established employment land is a separate section within the UCS. At 1 above we identify the low probability of the Main Road residential allocation coming forward. This remaining section of the UCS considers 11 further employment sites which were first identified in the 2000 UCS. Three of these are considered to have a high probability of coming forward. We have looked at these three sites and can find no evidence that they are likely to come forward. In the 8 years between 2000 and 2008 the three identified high probability employment sites have not been developed and there is no reason to assume that the next 5-10 years will be any different. For example the Rawreth Industrial Estate is identified as being well used in the UCS and although it has some unneighbourly uses there is no indication that the site is available, suitable or deliverable for residential. Land between 39-69 Lower Lambricks, Rayleigh is identified as having a high probability of residential uses. Yet there is no

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evidence of any pre-application advice or planning applications for this area. Stambridge Mills, Mill Lane, Stambridge is a further example. This site is separated from the urban area, in a flood risk zone and protected in the 2006 Replacement Local Plan by Policy EB9 which promotes B1 uses. Against this background there is only two relevant planning applications affecting this area both date from the early 1990's and relate to a plant room and loading bay. There is no evidence that this is likely to come forward for residential purposes in the next 5-10 years.

6. In the UCS extant permissions are identified as 856 dwellings. It is important to note that this figure needs to be continually reassessed so that from the point of adoption of the Core Strategy a 5 and 10 year housing land supply is available. The SHLAA notes extant permissions for 2009-14 being 106. As noted below extant permissions do not necessarily translate into deliverable sites. There is therefore a contingency that needs to be built in. Further allocations on greenfield land need to be increased and as such the quantum of housing in the area south of Hockley/Hawkwell should be increased to 330 dwellings in order to begin to meet the shortfall identified.

The District Council's 5 year housing supply assessment

7. The District Council's Annual Monitoring Report ("AMR") 2008 purports to demonstrate a 5 year housing land supply. The preamble to Table 4.10 in the AMR 2008 explains that Rochford District Council ("RDC") has included units under construction, units with full permission, units with outline permission, units with a resolution to grant, units subject to preapplication discussion/Urban Capacity Assessment and land allocations in its trajectory. The reader is referred to Appendix B which breaks down the sites in more detail. The recently published SHLAA also includes a table showing a potential 1273 dwellings deliverable. However, it refers to "appropriate brownfield sites." Since these 'appropriate sites' are do not benefit from an application or a planning permission it is difficult to programme them into the housing delivery trajectory.

8. In the full planning permission category of the AMR 2008 where work has not yet started there can be no guarantee that all these sites will be delivered in the 5 years. This comment relates to the one above in relation to the recently published SHLAA. It is not uncommon for permissions to be obtained to provide a means for valuing a site where the owner has no immediate plans to sell the site or develop housing. Delivery may also be hampered by funding constraints, or site assembly problems (where sites are in an alternative use or relocation constraints). Appendix B of the AMR 2008 does not set out the intentions of the landowner or whether the sites are truly achievable in the 5 year period as per PPS3 requirements. The SHLAA purports to show developer intentions at Appendix C but the assessment by the local authority into the legitimacy of some of the claims is not presented. The evidence base is not as full as it should be to demonstrate the robustness of Table 4.6 of the SCS. It is also unclear the extent to which this table is based on either the UCS 2007, AMR 2008, SHLAA 2009 or a combination of all three. This should be set out clearly.

9. In addition, to the 'non delivery' of a proportion of new homes in the AMR 2008, there is concern at the timings of delivery in that data set, for example, 10 units in 2008-2009 relates to outline planning permissions and it is doubtful whether reserved matters can be turned round quick enough to begin delivering housing in this year period. There could well be examples in that set of data where the delivery of units in the first year of the 5 is unlikely, thus delivery is reduced for that period and pushed back and this process is then compounded throughout the data set up to and beyond year 5. Statistical evidence from the Department of Communities and Local Government ("CLG") reveals that building starts are 43% down on the quarter to March 2009 compared with March 2008. It is not clear whether the recently published SHLAA has taken this into account and unless it does the data in the Table at 4.6 of the SCS cannot be relied upon, particularly given the current recessionary circumstances. In relation to the Table at Paragraph 4.6 a refinement is therefore needed to take into account this effect on phasing.

10. This problem is compounded for other units relied upon where permission has been granted but no start on site has been made; this accounts for a considerable number of sites in 2009-10 period (100 dwellings) which is (year 2 of the 5 year period). A delay in these will require more Greenfield sites to be identified in order to meet the shortfall.

11. Finally we note that the East of England Plan expresses its land supply requirement as a minimum. This strategy is not reflected in the

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Submission version of the Core Strategy policy H2.

12. In summary since neither the UCS nor the Annual Monitoring Report form a SHLAA, reservations are maintained about the degree to which sufficient housing land has been identified.

Policy H3

In the Preferred Options Core Strategy 2008 more locations were identified for housing growth in the post 2021 phase. Whilst it is our view that land south of Hockley/Hawkwell should benefit from a greater number of dwellings than the 175 currently identified (330) in order to make the strategy effective. We are concerned at the significant change in strategy between the Preferred Option Core Strategy and the Submission version, which has significantly less housing growth on green field sites. This change in strategy is so significant that we would question whether it is appropriate in the context of soundness and the consultation processes that have taken place so far.

We also have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with other policies in the SCS and feel that Green Belt review should be more explicit throughout the SCS. As it currently stands there is a potential conflict with national policies and limited justification for the Green belt strategy. We note that in Policy H3, which indicates the need for Green Belt land review, the advice is limited and unclear. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H3 and Policy GB1/H2 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary. Not to do so is unsound for justification and effectiveness reasons.

Policy H4 - Affordable Housing

As currently drafted we feel that the policy is not concise enough and that the policy does not reflect current guidance. The phrase 'at least' would indicate that in most cases affordable housing above 35% will be sought. Our understanding is that the 35% figure is recommended in the SHMA and that to provide a policy framework which seeks to go beyond that figure would potentially be unworkable as many sites could not financially bare the burden of over a third of the net developable area not yielding a value. The policy should be redrafted so that "a target of 35% affordable housing shall be provided on all developments of 15 or more units..."

The last policy paragraph provides some scope to relax this policy, if there are clear site constraints that make on site provision impossible. The policy, though, is not particularly clear on what would constitute exceptional circumstances. For example, physical site constraints, which unusually raise development costs, would be one such reason and this should be specified. There may be other reasons including the nature of housing needs in the part of the District the site is located which justify affordable housing below the 35% target. Design reasons may also have a bearing on how provision is made and in what form, particularly if the site is in an historic area where design might override housing need argument. It is therefore recommended that the policy expand on the type of circumstances where affordable housing may be relaxed and the type of information that will be sought of applicant's who have a need to invoke this part of the policy.

Policy H5

In support of the policy, it is advantageous that no percentages requiring a specific mix are included. This flexibility will enable developers and the Council to respond directly to changing circumstances in the local housing market. In the past some authorities have set out a percentage for the type of housing they require only to find that after a few years of strict implementation there is an oversupply of property of that type and no flexibility in the policy to address the problem.

Policy ED2 - London Southend Airport

It is considered that to grow non aviation related employment at a location north of Southend Airport where sustainable access from the rest of Rochford District requires careful consideration. Most Airports are serviced by aviation related employment development and as such a location close to the airport is sensible and sustainable. However, for surface access reasons it would be inappropriate to encourage travel from Rochford's main settlements to what essentially

Core Strategy Submission Document

16917 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

would be a rural location for general employment uses. Whilst sustainable access would be improved by a railway station and better bus links, there is no evidence to suggest that a sustainable surface access strategy for non related employment development at the Airport can be achieved. Paragraph 11.22 explains the critical importance of a railway station to the delivery of the strategy yet the Transport Chapter and Implementation Chapter provide neither a policy nor an assessment of deliverability. It is also notable that the South Essex Rapid Transit Policy T4, as set out at paragraph 10.16, notes that Rochford is not proposed to be served but may be served in future phases. This uncertainty is no way to plan for a major employment land supply strategy in the District. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley/Hawkwell, Rochford and Rayleigh is unsound.

Policy ED3

We fully support the first sentence of the Policy and note the apparent contradiction with the statements in Policy H1 and elsewhere which seeks to develop on alternative uses at industrial estates such as Eldon Way.

This contradiction is evidence in the second paragraph of Policy ED3. In our representations on Policy H1 we have explained why it is not sound to diminish the employment stock at Eldon Way and the importance of maintaining a dominance of employment type uses at this estate. These arguments are not repeated here.

We note the sentiments of the third paragraph and in accordance with our representations elsewhere are of the view that this sentence should be revised to explain that Eldon Way will accommodate principally employment type uses. As noted elsewhere uses which are an alternative to employment would diminish this highly sustainable employment site and this is unsound when assessed against National Policy.

Policy ED4 - Future Employment Allocations

In part, the de-allocation strategy is not supported as it is considered unsound when set against sustainability criteria. In relation to the Eldon Way Industrial Estate it is considered critical to the ongoing sustainability of this settlement that employment uses are maintained at this location. It is close to the railway station, bus routes and local residential areas from which the opportunity exists for employees to walk or cycle to work. Its location adjacent to the Town Centre offers opportunity for some retail and leisure development to complement the centre and to maintain a supporting function. These sustainable benefits would not occur with the deallocation of Eldon Way or the significant erosion of its employment floorspace. Whilst redevelopment of the employment site to achieve new employment is supported, the dominant land use should continue to be employment use. As a consequence, the 18ha of land required for employment in this policy is considered to be excessive and the policy should be reviewed to explain that redevelopment of existing employment sites for primarily new employment development will be encouraged.

Policy T4

It is noted that the South Essex Rapid Transit policy, as elaborated upon at paragraph 10.16 notes that Rochford is not served but may be served in future phases. This uncertainty is contrary to the delivery principles of soundness and directly puts at issue the employment land supply strategy in the District which is founded on sustainable access to new sites. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley, Rochford and Rayleigh is unsound.

Appendix H1, CTL1 - Infrastructure

It is recognised that necessary infrastructure provision is an important part of creating a sustainable development and in that context appendix H1 is supported. The supporting text notes that the table at Appendix H1 is not exhaustive and in that context it is very important that the framework properly distinguishes between what should be provided as part of new development schemes and what shouldn't. It is therefore essential that the framework acknowledges the importance of Circular 05/05 and the tests which say that provision of infrastructure and/or contributions should be:

- * Relevant to planning
- * Necessary to make the proposed development acceptable in planning terms
- * Directly related to the proposed development
- * Fairly and reasonably related in scale and kind to the proposed development
- * Reasonable in all other respects

As is made clear (Paragraph B9 of Circular 5/05) contributions should not be used to make good existing deficiencies in infrastructure provision. Nor are they to be used to secure contributions to the achievement of wider planning objectives that are not necessary for consent to be granted. In that context the Core Strategy should set this out as its policy framework.

Policy GB1 - Green Belt

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CHAPTER 4 Policy H1 - The efficient use of land for housing

The objectives of this policy are supported, although as noted in other representations the SCS is unsound as it does not meet the tests in relation to justification, compliance with national policy or effectiveness of strategy.

Policy GB1 mentions the objective to allocate the minimum amount of Green Belt land necessary. The policy should link to the requirements of PPG2 and RSS which are discussed in relation to the representations on Policy H2 and H3. The policy should set out a timeframe for the review and why Rochford requires a Green Belt review (what the exceptional circumstances are in this District that justify a review of local boundaries. The policy should be amended to set out a 2031 time frame and this may require the SCS to have an extended life span beyond 2021.

We would recommend the deletion of the word character since Green Belt designation is not related to landscape character as currently drafted. For clarity we would also recommend that the Policy or its supporting text explain that a Green Belt review will take place in support of an allocations document (paragraph 6.6) in order to identify an appropriate new boundary. This is particularly necessary given the commitment to a Green belt review in the adopted Local Development Scheme.

Policy CLT1 - Planning Obligations and Standard Charges

In view of the need to test fully the basis on which standard charges are based it is important that any document produced is in a development plan document that enables an examination in public. The policy should explain this in order that when the document is produced it accords with Policy and is based on sound evidence.

ENV9 - Code for Sustainable Homes

Object. The advice from the Department of Communities and Local Government is that the new requirement to have a rating against the Code does not make it mandatory to build a Code home or to have each new home assessed against the Code. It does however mean that all buyers of new homes be given clear information about the sustainability of the new home. A house builder can do this in one of two ways:

- they can choose to build a Code home, have that home assessed against the Code and provide the home buyer with a Code certificate stating the star rating the home has achieved
- or, they can choose to build to current building regulations standards, not to pay for an assessment and instead download a nil-rated certificate of non-assessment (also referred to as a nil-rating) to provide to the home buyer.

As such the Rochford policy requirement that coding 3 be achieved by 2010 and Code 6 by 2013 is out of step with Government advice. The policy wording should explain that it is just the coding that is a requirement of new homes and not necessarily that new homes should be constructed to achieve a standard.

The current Government objectives are for the code to be introduced over a reasonable period with development to be code 3 by 2010, code level 4 by 2013 and code level 5 by 2016. In this regard the policy, as drafted, seeks to achieve code 6 by 2013 and consequently compresses the code requirements into a shorter time scale with the costs associated expected to be subsumed within the housing market through higher prices. This is not a realistic strategy for the delivery of sustainable homes and we consider that the policy should be revised to extend the period of compliance but to also make it more flexible based on local circumstances.

Research undertaken on behalf of the Housing Corporation and English Partnerships, published in February 2007 'A cost review of the code for sustainable homes' reveals that code 6 is unlikely to be unattainable given existing technologies and that achieving code 5 could result in a 12% to 20% increase in costs that would have to be passed onto the consumer. Given the variability of the housing market with peaks and troughs, it is unlikely that the housing market would be able to subsume this level of price increase.

The code system policy as currently drafted does not have regard to site circumstances and so many of the requirements could be difficult to meet. For example, micro electricity generation on site may be difficult to achieve where local circumstances deter the capture of wind or solar power. If more expensive technologies are required to generate power than is the norm then costs will rise. There may be other competing reasons why designs cannot include certain sustainability measures if housing sites are in sensitive landscape and historic locations. Alternatively there may be significant development costs associated with site specific circumstances and so viability of the site's development becomes a valid consideration. By insisting on the code for sustainable homes other policy objectives such as affordable housing at particular rates and other contributions may need to be reconsidered. Consequently, we are of the view that this policy should be drafted in a manner which enables site specific circumstances to be taken into account. As noted above the Government explains that the code is a certification requirement and does not necessarily mean that buildings are constructed in accordance with a code level.

It is also important to note that it is not the purpose of planning legislation to duplicate other legislation. In this regard, the policy should accept that the Building Regulations will be the main vehicle for implementing this policy and that unless the coding requires external development then there will be no need to specify what is to be carried out in a planning application.

Core Strategy Submission Document

O - 16917 - 10009 - Policy H1 - The efficient use of land for housing - i

16917 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Summary:

Consequently, we do not support the phrasing of the third paragraph of Policy H1 and maintain that the most appropriate strategy is to seek renewal of the employment stock with employment based uses and with some new retail development. Removal of employment land uses completely as currently implied-which was the approach adopted in the emerging Hockley Area Action Plan - is not a justifiable strategy.

One of the key tests of a Core Strategy is consistency between policies in the emerging Plan and this strikes at the heart of demonstrating an effective strategy. Policy H1 implies alternative uses to employment and the relocation of Eldon Way to a site identified under Policy ED4. However, Policy RTC6 sets out a suite of policy criteria for Hockley Town Centre which includes employment and commercial activities. In addition Policy ED3 seeks the protection of sustainable employment sites (Eldon Way) and notes that some reallocation of existing employment sites will include a proportion of employment. It notes that in the case of Eldon Way employment development will form a component. The policies appear at odds with one another. The third paragraph of Policy H1 should be deleted as the second paragraph is sufficient to set a strategic context for delivering new housing development. The employment policies and Hockley specific policies should be left to consider the type and quantum of land uses appropriate in the area. If the third paragraph of H1 is to be retained then it should tie in more with Policy RTC6 and in our view explain that employment uses should dominate any redevelopment proposals for the Eldon Way site and that retail and leisure uses should be a supporting proportion.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16936 - 7801 - Policy H1 - The efficient use of land for housing - i, ii, iii

16936 Object

CHAPTER 4 Policy H1 - The efficient use of land for housing

Respondent: Mr G Marshall [7801]

193 Southend Road
Rochford
Essex

SS4 1JD

01702 541437

Agent: Generis Planning (Mr T Dodkins) [5081]

Generis Planning
Timber Thatch
Snow Hill
Great Easton
Dunmow
Essex

CM6 2DR

01371 870169

Full Text: Please see attached statement

Council ref AE32

Summary: Please see attached statement

Council ref AE32

Change to Plan Please see attached statement

Appear at exam? Yes

Soundness Tests i, ii, iii

Core Strategy Submission Document

S - 15742 - 10564 - Extensions to residential envelopes and phasing, 4.16 - None

15742 Support

CHAPTER 4 Extensions to residential envelopes and phasing, 4.16

Respondent: Mrs A Wate [10564]

glebe farm
barling rd
barling magna
ss3 0lx

Agent: N/A

Full Text: i support the principle of using green belt adjacent to current developed land in sites that are sustainable etc and have good transport links, so long as other land is put into green belt to compensate

Summary: i support the principle of using green belt adjacent to current developed land in sites that are sustainable etc and have good transport links, so long as other land is put into green belt to compensate

Change to Plan N/A

Appear at exam? Not Specified

Soundness Tests N/A

Core Strategy Submission Document

O - 15751 - 8830 - Extensions to residential envelopes and phasing, 4.16 - i

15751 Object

CHAPTER 4 Extensions to residential envelopes and phasing, 4.16

Respondent: Mrs Audrey Stemmmons [8830]

18 Victor Gardens
Hawkwell
SS5 4DR
England
01702 200572

Agent: N/A

Full Text: I feel the use of green belt land is totally unacceptable for new development.

Summary: I feel the use of green belt land is totally unacceptable for new development.

Change to Plan Use of brownfill only to be used.

Appear at exam? No

Soundness Tests i

Core Strategy Submission Document

S - 15796 - 8435 - Extensions to residential envelopes and phasing, 4.16 - None

15796 Support

CHAPTER 4 Extensions to residential envelopes and phasing, 4.16

Respondent: Mr Andrew Allen [8435]

36 connaught road,
Rayleigh
ss68ux
uk

Agent: N/A

Full Text: I agree that it is necessary to use green belt land to accomodate the additional housing that is required. However, I do not agree that the strategy detailed in this document is the best solution to address the requirement.

Summary: I agree that it is necessary to use green belt land to accomodate the additional housing that is required. However, I do not agree that the strategy detailed in this document is the best solution to address the requirement.

Change to Plan N/A

Appear at exam? Not Specified

Soundness Tests N/A

Core Strategy Submission Document

O - 15876 - 14102 - Extensions to residential envelopes and phasing, 4.16 - i, iii

15876 Object

CHAPTER 4 Extensions to residential envelopes and phasing, 4.16

Respondent: Mrs Frances Tibbs [14102]

Agent: N/A

Clovelly, Chelmsford Road, Rawreth,
Wickford,
Essex
SS11 8SY
UK
01245 320368

Full Text:

Breaches re "Soundness" include:
The evidence is flawed since the Hambro Nursery and Clovelly Works site has been disregarded without due process or logic.
Brownfields must always be preferred ahead of green belt.
Breaches re "Legal Compliance" :
It clearly does not comply with the Statement of Community Involvement, as the Parish Council has proposed alternatives and these have not been actively considered. This is not a NIMBY proposal, brown field sites have been identified within Rawreth (Hambro Nursery and Clovelly Works).
Revised wording : Clovelly Works and Hambro Nursery will be included as substitute locations as the combined site provides a credible alternative within the community with good access to roads and services. This would also 'spread the load' and reduce the impact of such a large scale 'one site' development.

The interests of the pragmatic and willing local residents, views of the Parish and District councillors and serving MP should be taken into consideration. The open-minded approach of the local residents (in accepting a degree of change) has been betrayed by the District Council's inflexibility in forming these adopted proposals.

Breaches falling under the "Soundness" umbrella include:

Despite logical, lower impact proposals for Hambro Nursery and Clovelly Works to be included the District Council have proceeded with the neatest proposal from a developers viewpoint. therefore it does not have a robust and credible evidence base, nor does it provide the most appropriate strategy when considered against reasonable alternatives.

It is not consistent with national policy since brownfields are always preferred ahead of green belt.

Breaches under the "Legal Compliance" umbrella include:

It clearly does not comply with the Statement of Community Involvement, as the Parish Council has proposed alternatives and these have not been actively considered. This is not a NIMBY proposal, brown field sites have been identified within Rawreth (Hambro Nursery and Clovelly Works).

Does the document conform generally to the Regional Spatial Strategy and national policy?

Summary:

Despite logical, lower impact proposals for Hambro Nursery and Clovelly Works to be included the District Council have proceeded with the neatest proposal from a developers viewpoint. It does not have a credible evidence base, nor does it provide an appropriate strategy when considered against reasonable alternatives.

Not consistent with national policy, brownfields are always preferred ahead of green belt.

Breaches under "Legality"

Does not comply with the Statement of Community Involvement, the Parish Council has proposed alternatives, these have not been actively considered. This is not a NIMBY objection, brown field sites have been identified within Rawreth (Hambro Nursery and Clovelly Works).

Change to Plan

Revised wording : Clovelly Works and Hambro Nursery will be included as substitute locations as the combined site provides a credible alternative within the community with good access to roads and services. This would also 'spread the load' and reduce the impact of such a large scale 'one site' development.

The interests of the pragmatic and willing local residents, views of the Parish and District councillors and serving MP should be taken into consideration. The open-minded approach of the local residents (in accepting a degree of change) has been betrayed by the District Council's inflexibility in forming these adopted proposals.

Appear at exam? No

Soundness Tests i, iii

Core Strategy Submission Document

O - 15929 - 7995 - Extensions to residential envelopes and phasing, 4.16 - i, ii

15929 Object

CHAPTER 4 Extensions to residential envelopes and phasing, 4.16

Respondent: Mr Alan Stone [7995]

180 Rawreth Lane
Rayleigh
Essex
SS6 9RN
United Kingdom
01268 784031

Agent: N/A

Full Text:

Unsound Statement: Does not comply with the Statement of Community Involvement.
Failure of RDC to take full advantage of land offered in Rawreth although their policy is to use "previously developed land to ensure the delivery of appropriate sites within existing settlements".
Rawreth Parish Council identified sufficient land of this nature within the centre of Rawreth village to accommodate approximately 250 dwellings.
The village residents and land owners supported this as it would benefit the community and provide much needed accommodation for next generations of families, who currently have no option but to move away to find places to live. The village benefits from a good transport infrastructure, being approximately half a mile from a mainline railway station to London. It is also in close proximity to the A127 & A130 trunk roads.
Had this proposal been accepted by RDC, it would have reduced by 45%, the need for 550 dwellings on the GREENBELT site identified as 'North of London Road Rayleigh'.

To express my objections, I refer to the 'Introduction' section of the Core Strategy Submission Document. June 2009 page 5.

* Column 1. Fostering Greater Community Cohesion

* Column 2. The sense of community is vital for eliminating social exclusion and encouraging cohesion. The Core Strategy seeks to ensure that a sense of community and identity is retained in existing residential areas, and that new residential developments are such that they will foster a sense of community.

Here I question the soundness of the document in respect of the above, as it does not have a "robust and credible evidence base" and "does not provide the most appropriate strategy when considered against reasonable alternatives" as policy states in the document.

Summary:

Failure of RDC to accept land offered in Rawreth village for 250 dwellings. Residents and landowners supported this. Good road and rail facilities within half mile. Would reduce greenbelt use by 45% in Rawreth.
*** I disagree with these summaries, please read the full submission.

Change to Plan

Consider Rawreth's proposal to take 250 dwellings and reduce the number of dwellings proposed on the ' North of London Road" site

Appear at exam? No

Soundness Tests i, ii

Core Strategy Submission Document

O - 15930 - 7995 - Extensions to residential envelopes and phasing, 4.16 - i, iii

15930 Object

CHAPTER 4 Extensions to residential envelopes and phasing, 4.16

Respondent: Mr Alan Stone [7995]

180 Rawreth Lane
Rayleigh
Essex
SS6 9RN
United Kingdom
01268 784031

Agent: N/A

Full Text: Descriptions such as "Rayleigh, north of London Road" have deliberately been used in this document, from the start, to distort the true facts. The area being proposed is proven to be in Rawreth and is in no way part of Rayleigh. It was only due to local pressure from residents that RDC finally conceded that Rawreth was the true location. However, this has still not been acknowledged by RDC in their final submission to the Planning Inspectorate. A similar unsound statement is made where different part of Rawreth is described as South West Hullbridge.

Summary: Descriptions such as "Rayleigh, north of London Road" have deliberately been used in this document, from the start, to distort the true facts. The area being proposed is proven to be in Rawreth and is in no way part of Rayleigh. It was only due to local pressure from residents that RDC finally conceded that Rawreth was the true location. However, this has still not been acknowledged by RDC in their final submission to the Planning Inspectorate. A similar unsound statement is made where different part of Rawreth is described as South West Hullbridge.

Change to Plan Change the location described as Rayleigh to Rawreth.

Appear at exam? No

Soundness Tests i, iii

Core Strategy Submission Document

S - 16082 - 14149 - Extensions to residential envelopes and phasing, 4.16 - None

16082 Support

CHAPTER 4 Extensions to residential envelopes and phasing, 4.16

Respondent: Swan Housing Association (Susan Rydings) [14149] **Agent:** N/A

Swan Housing Association
Group Head Office
Pilgrim House
High Street
Billericay
CM12 9XY
United Kingdom
00277844732

Full Text: Sensitive development on Green belt land will enable Rochford to meet the housing needs identified for the next few years

Summary: Sensitive development on Green belt land will enable Rochford to meet the housing needs identified for the next few years

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16175 - 9816 - Extensions to residential envelopes and phasing, 4.16 - i, ii, iii

16175 Object

CHAPTER 4 Extensions to residential envelopes and phasing, 4.16

Respondent: Stuart Tennison [9816]

11 Ely Way
Rayleigh
Essex
SS6 9TR
England

Agent: N/A

Full Text: Extension of residential envelope into greenbelt land in the Rawreth area is contrary to the greenbelt policy of preventing urban sprawl, and more consideration of available brownfield sites should be made.

Summary: Extension of residential envelope into greenbelt land in the Rawreth area is contrary to the greenbelt policy of preventing urban sprawl, and more consideration of available brownfield sites should be made.

Change to Plan Proposed use of Greenfield land in Rawreth area should be removed and replaced with review of available brownfield sites.

Appear at exam? No

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 16207 - 9935 - Extensions to residential envelopes and phasing, 4.16 - i, iii

16207 Object

CHAPTER 4 Extensions to residential envelopes and phasing, 4.16

Respondent: CPREssex (Mrs Valerie Stanton) [9935]

Agent: N/A

CPREssex
Hillcrest Farm
Lark Hil Road
Canewdon
SS4 3RZ
Essex

Full Text: CPREssex is very concerned at the policies for new housing which state that there is a lack of alternative or brownfield sites and therefore Green Belt must be released for development. The quantity of brownfield sites is not static and more will be created during the plan period.

Summary: CPREssex is very concerned at the policies for new housing which state that there is a lack of alternative or brownfield sites and therefore Green Belt must be released for development. The quantity of brownfield sites is not static and more will be created during the plan period.

Change to Plan There seems to be no consideration even in the section on Monitoring, that further brownfield sites may become available. If such sites came forward the need for Green Belt sites would be reduced.

Appear at exam? No

Soundness Tests i, iii

Core Strategy Submission Document

S - 16344 - 8267 - Extensions to residential envelopes and phasing, 4.16 - None

16344 Support

CHAPTER 4 Extensions to residential envelopes and phasing, 4.16

Respondent: Aber Ltd [8267]

Aber Ltd
C/o Agent

Agent: Colliers CRE (Mr S Chapman) [8266]

Colliers CRE
9 Marylebone Lane
London
W1U 1HL
020 7344 6533

Full Text: Support the findings that in order to fulfil the requirements of the East of England Plan to meet the housing need of the District, it will be necessary to allocate additional land for residential development, including land which is currently allocated within the Green Belt.

These new residential allocations should be in the most sustainable locations, as extensions to the higher tier settlements, which will require alterations to the settlement boundaries and removal of land from the Green Belt.

Summary: Support the findings that in order to fulfil the requirements of the East of England Plan to meet the housing need of the District, it will be necessary to allocate additional land for residential development, including land which is currently allocated within the Green Belt.

These new residential allocations should be in the most sustainable locations, as extensions to the higher tier settlements, which will require alterations to the settlement boundaries and removal of land from the Green Belt.

Change to Plan N/A

Appear at exam? No **Soundness Tests** N/A

Core Strategy Submission Document

O - 15877 - 14102 - Extensions to residential envelopes and phasing, 4.17 - i, iii

15877 Object

CHAPTER 4 Extensions to residential envelopes and phasing, 4.17

Respondent: Mrs Frances Tibbs [14102]

Agent: N/A

Clovelly, Chelmsford Road, Rawreth,
Wickford,
Essex
SS11 8SY
UK
01245 320368

Full Text: Greenbelt has been chosen in Rawreth ahead of Brownfield. Contrary to national guidelines and logic. See Hambro Nursery and Clovelly Works (a combined site) as alternatives to greenbelt. Local democratically elected representation has been ignored.

Summary: Greenbelt has been chosen in Rawreth ahead of Brownfield. Contrary to national guidelines and logic. See Hambro Nursery and Clovelly Works (a combined site) as alternatives to greenbelt. Local democratically elected representation has been ignored.

Change to Plan Rather than one large high impact development, the sites at Hambro Nursery, Clovelly Works and opposite will be included. The houses on these sites will reduce the overall London Road development.

Appear at exam? No

Soundness Tests i, iii

Core Strategy Submission Document

O - 15936 - 14133 - Extensions to residential envelopes and phasing, 4.17 - i, ii

15936 Object

CHAPTER 4 Extensions to residential envelopes and phasing, 4.17

Respondent: Mrs Angela Smith [14133]

Pear Tree Cottage
Church Road
Rawreth
WICKFORD
SS11 8SG
01268 733088

Agent: N/A

Full Text: Housing is planned for the farmland between Bedloes Corner & "Carpenters Arms" roundabout. This is one of the green spaces between Rawreth & Rayleigh. Housing here will be part of a sprawling Rayleigh

Summary: Housing is planned for the farmland between Bedloes Corner & "Carpenters Arms" roundabout. This is one of the green spaces between Rawreth & Rayleigh. Housing here will be part of a sprawling Rayleigh

Change to Plan Don't allocate housing on this farmland.

Appear at exam? No

Soundness Tests i, ii

Core Strategy Submission Document

S - 16083 - 14149 - Extensions to residential envelopes and phasing, 4.17 - None

16083 Support

CHAPTER 4 Extensions to residential envelopes and phasing, 4.17

Respondent: Swan Housing Association (Susan Rydings) [14149] **Agent:** N/A

Swan Housing Association
Group Head Office
Pilgrim House
High Street
Billericay
CM12 9XY
United Kingdom
00277844732

Full Text: Sustainable development can only be achieved when environmental considerations (including the protection of good quality green belt) are incorporated as part of the plan.

Summary: Sustainable development can only be achieved when environmental considerations (including the protection of good quality green belt) are incorporated as part of the plan.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16174 - 9816 - Extensions to residential envelopes and phasing, 4.17 - i, ii, iii

16174 Object

CHAPTER 4 Extensions to residential envelopes and phasing, 4.17

Respondent: Stuart Tennison [9816]

11 Ely Way
Rayleigh
Essex
SS6 9TR
England

Agent: N/A

Full Text: Green belt land is being proposed for this additional development when brownfield sites are available. The green belt land in the Rawreth area is a vital barrier to urban sprawl, and helps maintain the character of the town and neighbouring villages.

Summary: Green belt land is being proposed for this additional development when brownfield sites are available. The green belt land in the Rawreth area is a vital barrier to urban sprawl, and helps maintain the character of the town and neighbouring villages.

Change to Plan Brownfield sites to be considered in place of current greenbelt land.

Appear at exam? No

Soundness Tests i, ii, iii

Core Strategy Submission Document

S - 16345 - 8267 - Extensions to residential envelopes and phasing, 4.17 - None

16345 Support

CHAPTER 4 Extensions to residential envelopes and phasing, 4.17

Respondent: Aber Ltd [8267]

Aber Ltd
C/o Agent

Agent: Colliers CRE (Mr S Chapman) [8266]

Colliers CRE
9 Marylebone Lane
□
London
W1U 1HL
020 7344 6533

Full Text: Support the findings that in order to fulfil the requirements of the East of England Plan to meet the housing need of the District, it will be necessary to allocate additional land for residential development, including land which is currently allocated within the Green Belt.

These new residential allocations should be in the most sustainable locations, as extensions to the higher tier settlements, which will require alterations to the settlement boundaries and removal of land from the Green Belt.

Summary: Support the findings that in order to fulfil the requirements of the East of England Plan to meet the housing need of the District, it will be necessary to allocate additional land for residential development, including land which is currently allocated within the Green Belt.

These new residential allocations should be in the most sustainable locations, as extensions to the higher tier settlements, which will require alterations to the settlement boundaries and removal of land from the Green Belt.

Change to Plan N/A

Appear at exam? No **Soundness Tests** N/A

Core Strategy Submission Document

O - 15857 - 14090 - Extensions to residential envelopes and phasing, 4.18 - i

15857 Object

CHAPTER 4 Extensions to residential envelopes and phasing, 4.18

Respondent: Mr John Leech [14090]

23 Truro Cescent
Rayleigh
Essex
SS6 9RU
England
07821606859

Agent: N/A

Full Text: Your plan to build 770 more homes between London Road and Rawreth Lane is frankly ridiculous. I have been a resident here for 18 years and I have watched thousands of homes, added year after year. The area cannot cope with 1 more home let alone 770!

This is unsound. Farmland must not be built upon . Rayleigh (Rawreth) is doomed with this unrestricted sprawl and there now seems to be no natural stopping point until you have built right up to the A130. The local Roads will not cope and all identity will be lost

Summary: Your plan to build 770 more homes between London Road and Rawreth Lane is frankly ridiculous. I have been a resident here for 18 years and I have watched thousands of homes, added year after year. The area cannot cope with 1 more home let alone 770!

This is unsound. Farmland must not be built upon . Rayleigh (Rawreth) is doomed with this unrestricted sprawl and there now seems to be no natural stopping point until you have built right up to the A130. The local Roads will not cope and all identity will be lost

Change to Plan Use other brownfield sites which are available. Rawreth has had its share of new hosing. I have witnessed thousnads of new homes being built here, far exceeding anything I have seen in other parts of Rochford.

Vast numbers of houses were built on the old school land and the local nursery was lost to homes as well. Despite protests Asda's was then built. The Rawreth area should be left as it is now. You simply must share out this new hosing more responsibly

Appear at exam? No

Soundness Tests i

Core Strategy Submission Document

O - 15873 - 14096 - Extensions to residential envelopes and phasing, 4.18 - ii, iii

15873 Object

CHAPTER 4 Extensions to residential envelopes and phasing, 4.18

Respondent: mr Jon wetherell [14096]

15 Rawreth Lane
Rayleigh
Essex
ss6 9px

Agent: N/A

Full Text: As the area has seen high levels of new housing over recent years Rawreth lane has steadily become overloaded with high traffic levels at peak times and constant traffic throughout the day. The lack of any increase in facilities in the area also means that this development can not be supported.

Summary: As the area has seen high levels of new housing over recent years Rawreth lane has steadily become overloaded with high traffic levels at peak times and constant traffic throughout the day. The lack of any increase in facilities in the area also means that this development can not be supported.

Change to Plan Consideration should be given to using brown field sites off the A127 for example the the industrial areas around the weir that are not currently being used to full industrial capacity . This would mean that traffic could feed directly onto an arterial route rather than local roads, and the new population would be close to the high street and weir facilities, area where money on upgrading still appears to be available.

Appear at exam? No

Soundness Tests ii, iii

Core Strategy Submission Document

O - 15932 - 7995 - Extensions to residential envelopes and phasing, 4.18 - i, ii, iii

15932 Object

CHAPTER 4 Extensions to residential envelopes and phasing, 4.18

Respondent: Mr Alan Stone [7995]

180 Rawreth Lane
Rayleigh
Essex
SS6 9RN
United Kingdom
01268 784031

Agent: N/A

Full Text: When you study the facts, that of the 1785 dwellings proposed in the Rochford District to the year 2021 (excluding brown-field additions), the Rawreth Parish will have to absorb 800 from the basic housing allocation, all on Green Belt released land, and a massive total of 1020 dwellings when the 220 on Brown-Field at the Rawreth Industrial Estate are included. Currently there are just 373 dwellings in Rawreth and no other town, village or settlement in the district has been allocated such an unfair increase. This scale of this development, which equates to an increase in Rawreth, of approximately 270%, is totally out of proportion to what any other town or parish in the district has been allocated in terms of additional dwellings.

This makes a mockery of RDC's Policy statement of "Fair shares for all".

Summary: Why should Rawreth be forced to absorb 800 of the 1785 dwellings to year 2021. 800 greenbelt, 220 brownfield. Total 1020. Current dwellings in Rawreth 373 which equates to 270% increase. Totally out of proportion to any other town or parish in district.

*** I disagree with these summaries, please read the full submission.

Change to Plan Greatly reduce the allocation of dwellings for Rawreth and honour the fair shares for all policy.

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

S - 16084 - 14149 - Extensions to residential envelopes and phasing, 4.18 - None

16084 Support

CHAPTER 4 Extensions to residential envelopes and phasing, 4.18

Respondent: Swan Housing Association (Susan Rydings) [14149] **Agent:** N/A

Swan Housing Association
Group Head Office
Pilgrim House
High Street
Billericay
CM12 9XY
United Kingdom
00277844732

Full Text: Swan supports the suggested list of sites in H2 but would also support a flexible approach to switching sites from the by 2015 column to 2015-2021 column and vice versa.

Summary: Swan supports the suggested list of sites in H2 but would also support a flexible approach to switching sites from the by 2015 column to 2015-2021 column and vice versa.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16170 - 9816 - Extensions to residential envelopes and phasing, 4.18 - i, ii

16170 Object

CHAPTER 4 Extensions to residential envelopes and phasing, 4.18

Respondent: Stuart Tennison [9816]

11 Ely Way
Rayleigh
Essex
SS6 9TR
England

Agent: N/A

Full Text: New housing allocation proposed for Rawreth Lane area is far greater than that being proposed for other towns/villages in the Rochford district. It also does not take into account recent additional housing development in the area, and the lack of infrastructure to support this development.

Summary: New housing allocation proposed for Rawreth Lane area is far greater than that being proposed for other towns/villages in the Rochford district. It also does not take into account recent additional housing development in the area, and the lack of infrastructure to support this development.

Change to Plan Housing allocation should be reconsidered with a view to better sharing the number of dwellings across the district.

Appear at exam? No

Soundness Tests i, ii

Core Strategy Submission Document

O - 15733 - 9844 - Extensions to residential envelopes and phasing, 4.19 - i, ii, iii

15733 Object

CHAPTER 4 Extensions to residential envelopes and phasing, 4.19

Respondent: Mr J Wiseman [9844]
Unknown

Agent: N/A

Full Text: DAVID WILSON DEVELOPMENT RECTORY RD IS UNSOUND BECAUSE IT FAILS TO MEET THE REQUIREMENTS OF

â€¢The proximity and relationship to existing centres, facilities and services ,all local services shops are not within walking distance and very poor public transport from this area therefore increase in car use leading to increased pollution and congestions

â€¢The availability of infrastructure and/or the potential for additional infrastructure to be provided for development in such areas , no plans to increase infrastructure and restricted by local environment.

â€¢The potential to reduce private car dependency; exact opposite will lead to at least a 10% increase in daily traffic on b1013

â€¢The impact on highway network (including availability and impact on existing network, as well as potential for improvements to be delivered) as above no potential improvements listed and damaging negative impact on highway network.

â€¢The relationship of development locations to the District's areas of employment growth , will be commuter housing so adds little to local employment growth

not in keeping with local environment

Summary: no viable travel plan required for developments of 50+ houses.

the only thing that this development will add to is congestion and pollution. as the b1013 is already carrying more cars than its design load 10000+ per day and regularly has traffic jams with average speeds in blackspots of <10 mph in the rush hour how will adding 175 or 330 houses (at least the same number of cars) help the situation

Change to Plan any development must be backed by a increase in infrastructure yet there is only talk of increase in highway capacity / improvements.

i have lived here for 20yrs and 15yrs + ago the rdc when proposing the re development of cherry orchard way it was suggested that it would continue across to the a130 to act as a by pass. this never happened and it inevitably caused an increase in local traffic which had this been declared earlier i and i think many others would have objected to. therefore unfortunately the previous actions of the rdc leads me to think that we need to see the plans and have the increase in capacity/improvements prior to any housing development as the plan and what is delivered are not the same.

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 15881 - 14103 - Extensions to residential envelopes and phasing, 4.19 - i, ii, iii

15881 Object

CHAPTER 4 Extensions to residential envelopes and phasing, 4.19

Respondent: Mrs Sharon Morris [14103]

Brent Lodge, Woodham Road,
Battlesbridge,
Wickford,
Essex
SS11 7QW
United Kingdom
01245320368

Agent: Mrs Sharon Morris [14103]

Brent Lodge, Woodham Road,
Battlesbridge,
Wickford,
Essex
SS11 7QW
United Kingdom
01245320368

Full Text: Developing on land adjacent to Bedloes Avenue would be a 'location on the edge of settlements'. Hambro Nursery and Clovelly Works have been submitted as one site for housing.

Summary: Developing on land adjacent to Bedloes Avenue would be a 'location on the edge of settlements'. Hambro Nursery and Clovelly Works have been submitted as one site for housing.

Change to Plan Hambro Nursery, Clovelly Works and Land Opposite (as proposed by Parish Council) will be included for housing.

Appear at exam? Yes

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 15933 - 7995 - Extensions to residential envelopes and phasing, 4.19 - i, ii

15933 Object

CHAPTER 4 Extensions to residential envelopes and phasing, 4.19

Respondent: Mr Alan Stone [7995]

180 Rawreth Lane
Rayleigh
Essex
SS6 9RN
United Kingdom
01268 784031

Agent: N/A

Full Text:

Section: H1
Para 4.19. Bullet 9. The avoidance of coalescence with neighbouring settlements.

This Core Strategy submission states: "there is a need to avoid the coalescence with neighbouring settlements". This statement is unsound as it is being ignored in the case of Rawreth and Rayleigh.

The coalescence will occur in the vicinity of Rawreth Lane, which is a busy 2 mile stretch of road with approximately 1 mile in Rayleigh and 1 mile in Rawreth.

In the past 20 years, the Rayleigh section has had a number of new estates linked, by access roads, to it. A total of 665 new dwellings have been built on these estates during this period.

With the submitted proposal for an additional 770 dwellings (550 & 220) 'North of London Road' and immediately adjacent the existing Rayleigh housing estates this can only be described as a blatant move to coalescence.

Summary:

Does not acknowledge coalescence between Rayleigh & Rawreth. Affects Rawreth Lane. Links 800 new dwellings to 665 dwellings built off Rawreth lane in past 20yrs. Adds unacceptable levels of traffic to already congested road.

*** I disagree with these summaries, please read the full submission.

Change to Plan

Relocate the allocation of dwellings to avoid coalescence

Appear at exam? No

Soundness Tests i, ii

Core Strategy Submission Document

O - 16106 - 7336 - Extensions to residential envelopes and phasing, 4.19 - i

16106 Object

CHAPTER 4 Extensions to residential envelopes and phasing, 4.19

Respondent: Rayleigh Town Council (Mrs K Cumberland) [7336] **Agent:** N/A

Rayleigh Town Council
The Pavilion
King George V Playing Field
Bull Lane
Rayleigh
Essex
SS6 8JD

01268 741880

Full Text: P43 Para 4.19 States that development should have the potential to create a defensible Green belt boundary. The proposal for 550 houses on land "north of London Rd" is unsound in that it creates a boundary that is difficult to defend until the A1245 road is reached. A better alternative would be to locate some proposed brownfield sites in Rawreth. The remainder could be located on smaller sites in Rayleigh which have been ruled out by the preference for this larger area. This would meet the guidance in PPG2 "to check the unrestricted sprawl of large built up areas" preventing the eventual coalescence of Rayleigh, Rawreth and Shotgate

Summary: A better alternative would be to locate some of these on proposed brownfield sites in Rawreth village. The remainder could be located on smaller sites in Rayleigh which have been ruled out by the preference for this larger area.

Change to Plan see above

Appear at exam? No **Soundness Tests** i

Core Strategy Submission Document

O - 16110 - 7995 - Extensions to residential envelopes and phasing, 4.19 - i, ii, iii

16110 Object

CHAPTER 4 Extensions to residential envelopes and phasing, 4.19

Respondent: Mr Alan Stone [7995]

180 Rawreth Lane
Rayleigh
Essex
SS6 9RN
United Kingdom
01268 784031

Agent: N/A

Full Text:

4.19 Extensions to residential envelopes and phasing*

- * The historical, agricultural and ecological value of land;
- * The potential to create a defensible Green Belt boundary;

The proposed site known as 'North of London Road' is approximately 130 hectares of prime Green Belt land. The site is prime agricultural land and already forms a defensible Green Belt boundary.

Allocation of exactly where dwellings are to be erected on this site is not included in the document and the district council flatly refuse to make comment on this stating that at this stage they cannot be "site specific".

Such negativity creates uncertainty as to what part of the 130 hectares will be built on and therefore, as a resident, I find it difficult to make comment due to this lack of information. This in my view highlights yet another example of vagueness and unsound delivery.

This proposal should be made far clearer and identify such aspects as:

- * How much of the Green Belt will be retained.
 - * The area the site will occupy.
 - * The actual location of dwellings.
 - * Type of dwellings, ie. houses or flats.
 - * Provision of road access and where exactly this will be. Will it result in 'rat- runs between Rawreth Lane and London Road?
 - * How the siting of dwellings will be arranged to avoid the flood areas already identified by the Environment Agency on their web-site
 - * The plans for dealing with surface water drainage and the direction of flow it will take to the River Crouch. Rawreth village already experiences fluvial flood problems from run-off water from this site.
 - * Will this development lead to the detriment or decline of the prime farmland it now is?
- All of the above points have been raised during the consultation period but none appear to have been addressed or answered in the submission.

Summary:

It is not possible summaries this section in 50 words other than to say that section 4.19 is too vague and lacks substantial information. Please read the full submission.

Change to Plan

Re-write the section with positive and informative comments

Appear at exam? No

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 16114 - 14160 - Extensions to residential envelopes and phasing, 4.19 - i

16114 Object

CHAPTER 4 Extensions to residential envelopes and phasing, 4.19

Respondent: Cllr Chris Black [14160]

56 Love Lane
Rayleigh
Essex
SS67DX

Agent: N/A

Full Text: Developments should have "The potential to create a defensible Green Belt boundary". The proposal for 'housing north of London Road' creates an unnatural boundary that is not defensible and therefore the proposal is unsound.

Summary: Developments should have "The potential to create a defensible Green Belt boundary". The proposal for 'housing north of London Road' creates an unnatural boundary that is not defensible and therefore the proposal is unsound.

Change to Plan Other, smaller, brownfield sites could be used as an alternative to 'land North of London Road'

Appear at exam? Yes

Soundness Tests i

Core Strategy Submission Document

O - 16176 - 9816 - Extensions to residential envelopes and phasing, 4.19 - i, ii

16176 Object

CHAPTER 4 Extensions to residential envelopes and phasing, 4.19

Respondent: Stuart Tennison [9816]

11 Ely Way
Rayleigh
Essex
SS6 9TR
England

Agent: N/A

Full Text: Proposal for extra development in the Rawreth area does not comply with the points under consideration. The location is not well served with public transport or cycle routes, and it will encourage car dependency. General infrastructure is already poor, and no significant improvements have been proposed. Flooding in the area is also an issue that will not be helped by the added development.

Summary: Proposal for extra development in the Rawreth area does not comply with the points under consideration. The location is not well served with public transport or cycle routes, and it will encourage car dependency. General infrastructure is already poor, and no significant improvements have been proposed. Flooding in the area is also an issue that will not be helped by the added development.

Change to Plan Reconsider the number of dwellings and location.

Appear at exam? No **Soundness Tests** i, ii

Core Strategy Submission Document

S - 16346 - 8267 - Extensions to residential envelopes and phasing, 4.19 - None

16346 Support

CHAPTER 4 Extensions to residential envelopes and phasing, 4.19

Respondent: Aber Ltd [8267]

Aber Ltd
C/o Agent

Agent: Colliers CRE (Mr S Chapman) [8266]

Colliers CRE
9 Marylebone Lane
London
W1U 1HL
020 7344 6533

Full Text: In identifying the settlements in which development should be directed, agree that residential development should avoid areas of constraint, including areas of risk of flooding.

Furhtermore, where land is released from the Green Belt to accommodate additional residential development, this should ensure that the resultant development creates a defensible Green Belt boundary, and does not result in the coalescence of neighbouring settlements.

Summary: In identifying the settlements in which development should be directed, agree that residential development should avoid areas of constraint, including areas of risk of flooding.

Furhtermore, where land is released from the Green Belt to accommodate additional residential development, this should ensure that the resultant development creates a defensible Green Belt boundary, and does not result in the coalescence of neighbouring settlements.

Change to Plan N/A

Appear at exam? No **Soundness Tests** N/A

Core Strategy Submission Document

O - 16839 - 7704 - Extensions to residential envelopes and phasing, 4.19 - iii

16839 Object

CHAPTER 4 Extensions to residential envelopes and phasing, 4.19

Respondent: English Heritage (Ms K Fletcher) [7704]

Agent: N/A

English Heritage
Brooklands
24 Brooklands Avenue
Cambridge
CB2 2BU

Full Text: ROCHFORD LOCAL DEVELOPMENT FRAMEWORK
CORE STRATEGY SUBMISSION DOCUMENT

Thank you for your letter dated 21 September 2009 consulting English Heritage on the above document. Our comments are set out below.

CHAPTER 4 HOUSING

Vision and objectives

While we note that character of place is addressed in chapter 5, it is important that this consideration is recognised as relevant within the Housing chapter. Paras 2.33, 2.69 and 2.73 also recognise the importance of character and sense of place in the built environment. We recommend that this consideration should be integrated into the vision and objectives for housing in order to improve the clarity of the plan, and its consistency with advice in PPS1.

Recommendation:

The following amendments are suggested:

- Vision in five years: add 'settlement character' after 'infrastructure'
- Vision by 2025: add 'and places' after 'communities' in bullet 1
- Objectives: In objective 2 amend to '...sustainable locations, enhancing sense of place and having regard to..'
- Para 4.19: Amend bullet 5 to read 'The historical, agricultural and ecological value of land, and settlement character'

CHAPTER 5 CHARACTER OF PLACE

We strongly support this section and policies CP1, CP2 and CP3. In the absence of policy coverage for listed buildings and scheduled monuments we recommend that para 5.9 should refer to PPGs 15 and 16, as well as draft PPS15.

CHAPTER 8 ENVIRONMENTAL ISSUES

We welcome the references the historic environment in the objectives and in policies ENV1 and ENV2.

Policy ENV6 Large Scale Renewable Energy Projects

We consider that this policy should refer to the historic interest of sites to reflect the advice in PPS22 more appropriately.

Recommendation: amend the first bullet in policy ENV6 to read '...it's ecological, historic or landscape value...'

CHAPTER 11 ECONOMIC DEVELOPMENT

Policy ED2 London Southend Airport

We understand that the grade I listed church in the vicinity of the runway will be protected in any proposals for expansion of the airport and the Core Strategy policy does not suggest otherwise. We will respond to the detail of proposals for the airport through responses to consultations on the Joint Area Action Plan and any planning applications.

In the interests of clarity, the above comments where we suggest changes to the Core Strategy should be recorded as objections to the soundness of the plan in terms of consistency with national guidance. However, we hope that it will be possible to agree amendments on these points prior to the public examination.

We would be happy to discuss any of these comments if you would find this useful.

Summary:

Vision and objectives

While we note that character of place is addressed in chapter 5, it is important that this consideration is recognised as relevant within the Housing chapter. Paras 2.33, 2.69 and 2.73 also recognise the importance of character and sense of place in the built environment. We recommend that this consideration should be integrated into the vision and objectives for housing in order to improve the clarity of the plan, and its consistency with advice in PPS1.

Change to Plan

Appear at exam? Not Specified

Soundness Tests iii

Core Strategy Submission Document

O - 15878 - 14102 - Extensions to residential envelopes and phasing, 4.23 - i, iii

15878 Object

CHAPTER 4 Extensions to residential envelopes and phasing, 4.23

Respondent: Mrs Frances Tibbs [14102]

Agent: N/A

Clovelly, Chelmsford Road, Rawreth,
Wickford,
Essex
SS11 8SY
UK
01245 320368

Full Text: The phasing of the release of greenbelt is surely not achieved by ignoring the brownfield sites identified by the Parish Council and submitted under the 'call for land'. Clovelly Works and Hambro Nursery are sites that should be used ahead of any greenbelt.

Summary: The phasing of the release of greenbelt is surely not achieved by ignoring the brownfield sites identified by the Parish Council and submitted under the 'call for land'. Clovelly Works and Hambro Nursery are sites that should be used ahead of any greenbelt.

Change to Plan The local democratic process must be supported, Parish Council, District Council and MP sponsored proposals include Hambro Nursery and Clovelly Works. Both are brownfield and preferred locations in accordance with national policy.

Appear at exam? No **Soundness Tests** i, iii

Core Strategy Submission Document

O - 15880 - 14104 - Extensions to residential envelopes and phasing, 4.23 - i, iii

15880 Object

CHAPTER 4 Extensions to residential envelopes and phasing, 4.23

Respondent: Mr Brian Tibbs [14104]

c/o Brent Lodge, Woodham Road,
Battlesbridge,
Wickford,
Essex
ss11 7qw
United Kingdom
01245 320368

Agent: Mrs Sharon Morris [14103]

Brent Lodge, Woodham Road,
Battlesbridge,
Wickford,
Essex
SS11 7QW
United Kingdom
01245320368

Full Text: Releasing land for 550 houses at London Road is excessive and not phased at all. The brownfield site at Clovelly Works and Hambro Nursery provide an alternative approach, delivering the 550 houses with less impact on the existing Rawreth settlement or the greenbelt.

Summary: Releasing land for 550 houses at London Road is excessive and not phased at all. The brownfield site at Clovelly Works and Hambro Nursery provide an alternative approach, delivering the 550 houses with less impact on the existing Rawreth settlement or the greenbelt.

Change to Plan Hambro Nursery and Clovelly Works to be included as preferred sites for development, as proposed by the local democratically elected representatives.

Appear at exam? Yes

Soundness Tests i, iii

Core Strategy Submission Document

O - 16178 - 9816 - Extensions to residential envelopes and phasing, 4.23 - i, ii, iii

16178 Object

CHAPTER 4 Extensions to residential envelopes and phasing, 4.23

Respondent: Stuart Tennison [9816]

11 Ely Way
Rayleigh
Essex
SS6 9TR
England

Agent: N/A

Full Text: Proposed release of greenbelt land in Rawreth area for this development is ignoring the potential to develop brownfield sites that have been put forward.

Summary: Proposed release of greenbelt land in Rawreth area for this development is ignoring the potential to develop brownfield sites that have been put forward.

Change to Plan Review potential brownfield sites

Appear at exam? No

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 16347 - 8267 - Extensions to residential envelopes and phasing, 4.23 - ii

16347 Object

CHAPTER 4 Extensions to residential envelopes and phasing, 4.23

Respondent: Aber Ltd [8267]

Aber Ltd
C/o Agent

Agent: Colliers CRE (Mr S Chapman) [8266]

Colliers CRE
9 Marylebone Lane
London
W1U 1HL
020 7344 6533

Full Text: Agree with the general locations and phasing of residential properties over the period, and the plan seeks to develop brownfield sites prior to the release of Green Belt. However, in light of the current economic conditions and the need to maintain an adequate five year supply; the policy needs to adopt a flexible approach with regards the timing and release of land for residential development, which may require the earlier release of Green Belt land.

Amend paragraph as follows:

It is important to phase the loss of Green Belt land to ensure that there is not an early or excessive release which may discourage redevelopment of previously developed land or undermine town centre regeneration projects. However, in order to maintain the housing trajectory it may be appropriate for the early release of Green Belt sites, to compensate for previously developed sites that may fail to come forward in the projected timescale; this approach will ensure that the Council maintains its five year supply.

Summary: Agree with the general locations and phasing of residential properties over the period, and the plan seeks to develop brownfield sites prior to the release of Green Belt. However, in light of the current economic conditions and the need to maintain an adequate five year supply; the policy needs to adopt a flexible approach with regards the timing and release of land for residential development, which may require the earlier release of Green Belt land.

Change to Plan Amend paragraph as follows:

It is important to phase the loss of Green Belt land to ensure that there is not an early or excessive release which may discourage redevelopment of previously developed land or undermine town centre regeneration projects. However, in order to maintain the housing trajectory it may be appropriate for the early release of Green Belt sites, to compensate for previously developed sites that may fail to come forward in the projected timescale; this approach will ensure that the Council maintains its five year supply.

Appear at exam? No

Soundness Tests ii

Core Strategy Submission Document

O - 15714 - 13961 - Policy H2 - Extensions to residential envelopes and phasing - iii

15714 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Shelley Halton [13961]

Not provided

Agent: N/A

Full Text:

I strongly oppose the building of 175 houses in Hawkell, as the ward is unsound because the vital requirements of PPS12 are not met. Therefore the location of Hawkell West should be removed by the inspector.

The reasons the location is unsustainable are:

limited public transport.

car use increasing congestion

inability to improve highways

distance from shops

distance from rail stations

semi rural location unsuitable for large development complete loss of character loss of green belt loss of wildlife no social, economic or environmental benefits.

Summary:

I strongly oppose the building of 175 houses in Hawkell, as the ward is unsound because the vital requirements of PPS12 are not met.

The reasons the location is unsustainable are:

limited public transport.

car use increasing congestion

inability to improve highways

distance from shops

distance from rail stations

semi rural location unsuitable for large development complete loss of character loss of green belt loss of wildlife no social, economic or environmental benefits.

Change to Plan

The location of Hawkell West should be removed by the Inspector

Appear at exam? Not Specified

Soundness Tests iii

Core Strategy Submission Document

15715 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr and Mr Wood [13962]

9 High Mead
Hockley
Essex
SS5 4QG

Agent: N/A

Full Text: Re: Objection to Rochford Core Strategy, 175 houses in Hawkwell.

The proposal in the Rochford Core Strategy for this many houses in the Ward of Hawkwell West is unsound because the vital requirements of PPS12 are not met in terms of sustainability, and, therefore, the location of Hawkwell West (South Hawkwell) should be removed by the Inspector and the allocation moved to a sustainable location. In summary the reasons that development in this location is unsustainable under PPS12 are as follows:-

Travel

- â€¢ Limited public transport
- â€¢ Increased car use causing heavy congestion
- â€¢ Inability to improve highways
- â€¢ Distance from shops
- â€¢ Distance from rail stations

Environment

- â€¢ Semi rural location unsuitable for large development
- â€¢ Complete loss of character
- â€¢ Loss of green belt
- â€¢ Loss of wildlife
- â€¢ NO social, economic or environmental benefits whatsoever

In addition the Core Strategy is unsound because it does not fulfil the principles that are expressly stated in the Core strategy as it relates to the proposal for Hawkwell. Please see the following:

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic, environmental benefits'. No such benefits would apply to this location and the development would be materially detrimental to the character of the existing settlement in Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

The Core Strategy says 'locate development in areas where alternatives to car use are more viable', reduce the requirement to travel', and accompany any development with requisite highway infrastructure to 'mitigate their impact on existing network'. It is not possible to do this in Hawkwell West as there is no space for development of local roads, especially in Rectory Road, and any development here would increase the requirement to travel, especially by car. Moving on to Public Transport the Core Strategy states that 'planning should be well related to existing public transport where possible'. There is just one bus to and from Southend/Rayleigh per hour with no prospect of Arriva providing an appropriate service in the long term.

Finally, such a large scale development would leave to an unwelcome strip coalescence of built settlements which is not in line with Council policy.

Summary: In summary the reasons that development in this location is unsustainable under PPS12 are as follows:-

Travel

- â€¢ Limited public transport
- â€¢ Increased car use causing heavy congestion
- â€¢ Inability to improve highways
- â€¢ Distance from shops
- â€¢ Distance from rail stations

Environment

- â€¢ Semi rural location unsuitable for large development
- â€¢ Complete loss of character
- â€¢ Loss of green belt
- â€¢ Loss of wildlife
- â€¢ NO social, economic or environmental benefits whatsoever

In addition the Core Strategy is unsound because it does not fulfil the principles that are expressly stated in the Core strategy as it relates to the proposal for Hawkwell. Please see the following:

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic, environmental benefits'. No such benefits would apply

Core Strategy Submission Document

15715 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

to this location and the development would be materially detrimental to the character of the existing settlement in Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

The Core Strategy says 'locate development in areas where alternatives to car use are more viable', reduce the requirement to travel', and accompany any development with requisite highway infrastructure to 'mitigate their impact on existing network'. It is not possible to do this in Hawkwell West as there is no space for development of local roads, especially in Rectory Road, and any development here would increase the requirement to travel, especially by car. Moving on to Public Transport the Core Strategy states that 'planning should be well related to existing public transport where possible'. There is just one bus to and from Southend/Rayleigh per hour with no prospect of Arriva providing an appropriate service in the long term.

Finally, such a large scale development would leave to an unwelcome strip coalescence of built settlements which is not in line with Council policy.

Change to Plan The location of Hawkwell West (South Hawkwell) should be removed by the Inspector and the allocation moved to a sustainable location.

Appear at exam? Not Specified **Soundness Tests** iii

Core Strategy Submission Document

O - 15717 - 9717 - Policy H2 - Extensions to residential envelopes and phasing - i

15717 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr & Mrs Collings [9717]

Stoneyend
30 Thorpe Road
Hockley
Essex
SS5 4EP

Agent: N/A

Full Text:

We are also now writing to you separately to register our concern about Rochford Council Core Strategy which I understand is recommending the building of 175 new houses in Hawkwell/Hockley. This Core strategy is unsound because it does not fulfil the principles that are expressly stated.

We moved into the Hockley & Hawkwell area three years ago to enjoy the peace and quiet of semi rural life so the thought of the implications of 175 new houses being built on the land between Main Road and Rectory Road and Clements Hall Way are mind boggling. A semi rural location such as ours is a location unsuitable for large development. This would result in the loss of our semi rural location which would leave our vicinity with a complete loss of character. We would suffer a severe loss of green belt, wildlife, green fields, green gaps and many trees, the proposed area is a natural nature reserve in its own right.

175 houses means at least 500 more vehicles trying to gain access to main roads that are already congested. Parking in Thorpe Road is already full with resident parking and can only take a small flow of traffic, single file, how on earth is this road alone going to cope with all the strain of all this new traffic wanting access from the new houses to the main road. These proposed new properties are a fair distance from the rail stations, schools and shops so people will have to go about their business by car. Even if public transport is increased this will not solve the situation, the persons moving into these newly proposed homes would in general be young families and in this day and age most people travel by car and have at least 2/3 cars per household so even if you grant a subsidy for those that might wish to travel by bus the impact will not be diminished to any great extent.

Furthermore, we as local residents know that Rectory Road is already overstretched. Nursery Corner is a bottleneck now and there is very little scope for road widening if any, also the proposal to make a new road crossing from Clements Hall way right over to Thorpe Road is crazy, as we said above how is all this traffic going to gain access to the main road, it is difficult enough now to turn right. We cannot see how traffic lights or a mini roundabout would assist this even if this became a future plan of yours.

The entire proposal is completely unworkable and will cause chaos and disharmony to what is at present a wonderful peaceful and tranquil area to reside in, we can see no social, economic or environmental benefits whatsoever. We therefore object most strongly against this Core Strategy for the reasons set out above and we think you will find that there is a strong resistance locally to this project.

Summary:

We are also now writing to you separately to register our concern about Rochford Council Core Strategy which I understand is recommending the building of 175 new houses in Hawkwell/Hockley. This Core strategy is unsound because it does not fulfil the principles that are expressly stated.

We moved into the Hockley & Hawkwell area three years ago to enjoy the peace and quiet of semi rural life so the thought of the implications of 175 new houses being built on the land between Main Road and Rectory Road and Clements Hall Way are mind boggling. A semi rural location such as ours is a location unsuitable for large development. This would result in the loss of our semi rural location which would leave our vicinity with a complete loss of character. We would suffer a severe loss of green belt, wildlife, green fields, green gaps and many trees, the proposed area is a natural nature reserve in its own right.

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Furthermore, we as local residents know that Rectory Road is already overstretched. Nursery Corner is a bottleneck now and there is very little scope for road widening if any, also the proposal to make a new road crossing from Clements Hall way right over to Thorpe Road is crazy, as we said above how is all this traffic going to gain access to the main road, it is difficult enough now to turn right. We cannot see how traffic lights or a mini roundabout would assist this even if this became a future plan of yours.

The entire proposal is completely unworkable and will cause chaos and disharmony to what is at present a wonderful peaceful and tranquil area to reside in, we can see no social, economic or environmental benefits whatsoever. We therefore object most strongly against this Core Strategy for the reasons set out above and we think you will find that there is a strong resistance locally to this project.

Core Strategy Submission Document

O - 15717 - 9717 - Policy H2 - Extensions to residential envelopes and phasing - i

15717 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 15719 - 8214 - Policy H2 - Extensions to residential envelopes and phasing - i, ii, iii

15719 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Miss Debbie Good [8214]

21 Creswick Avenue
Rayleigh
Essex
SS6 9HG

Agent: N/A

Full Text: I strongly object to 550 houses being built North of London Road in Rayleigh.

Not actually defining where north of London Road is!

Is some of this area not a Green Belt Area ?

North of London Road has no infrastructure for the Roads and Public Transport.

Summary: I strongly object to 550 houses being built North of London Road in Rayleigh.

Not actually defining where north of London Road is!

Is some of this area not a Green Belt Area ?

North of London Road has no infrastructure for the Roads and Public Transport.

Change to Plan I have lived in Rayleigh since I was 2 years old and I have seen this area change from a small friendly town in to a large over populated area with a rising crime rate.

Houses do need to be built but not for 550 although this is an improvement on the original amount, Rochford Council got rid of all their council homes to a Housing Association, what happened to the money that was paid when people bought these properties from them?

If houses do have to be built in Rayleigh they should be Affordable/Council properties for local people living in Rayleigh already, therefore not over stretching the services already available.

I bet the private property developers are rubbing their hands together already calculating how much money they are going to make from this.

There is inadequate roads / public transport and doctors as well as schools, it does not make sense to build this amount of housing for people outside of the Rayleigh area as there already is a housing problem here waiting lists of 12 years plus that's even if you can get on the register, more people coming in are not going to help.

If this goes ahead is going to ruin the area, Rayleigh will just become another Southend/Basildon!!!

What facilities are there in Rayleigh for families to use e.g. swimming pool, cinema, bowling (none)

Appear at exam? No

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 15748 - 9196 - Policy H2 - Extensions to residential envelopes and phasing - i

15748 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr R Hill [9196]

15 Spencers
Hawkwell
Hockley
Essex
SS5 4LW

Agent: N/A

Full Text:

Objection to Rochford Core Strategy - 175 houses in Hawkwell is Unsound

The proposed building of 175 houses in Hawkwell as included in the Rochford Core Strategy, is we believe unsound, because the key requirements of PPS12 cannot be met in terms of sustainability, and we therefore request that the location, Hawkwell, be removed by the Inspector and the allocation be moved to a sustainable location such as the old Brickworks in Cherry Orchard Lane, which even has the access road already in place, is brown land rather than green belt and would not cause many of the problems we have highlighted below.

We believe that the development of Hawkwell is unsustainable for a number of reasons, including (but not exclusively);

The increased car use causing even more congestion (it already takes up to five minutes to get out of Thorpe Road at peak times at peak times and then only when somebody 'lets you out'.

The inability to improve the highway as it is built up on either side.

The lack of sufficient doctors or dentists to support the existing population let alone an increase.

The lack of additional school place and the fact that these schools are land locked so cannot expand.

In addition there are environmental issues, including;

Hawkwell is a semi rural environment and as such is unsuitable for development.

Such a large development would ruin the character of this village. The development would encroach on much needed green belt, when there are brown sites nearby that would actually benefit from development. We currently enjoy the benefit of a varied wildlife and they have a superb environment in which to thrive, exactly where it is proposed to create this development. Once the wildlife has been removed/killed it is gone for ever and our children will be the worse for not having the experience we can enjoy on a daily basis.

We are afraid that we can see no social economic or environmental benefits whatsoever. Apart from the points raised above, we will see more teenagers loitering in Clements Hall Park as they have nothing else to do.

In addition, the Core Strategy is unsound because it does not fulfil the principals that are expressly stated in that Core Strategy as it relates to Hawkwell as follows;

The Core Strategy discusses the protection of the character of existing settlements and specifically 'seeks to take advantage of development that will provide social, economic and environmental benefits'. No such benefits would apply to this location and such development would be materially detrimental to the existing settlement in Hawkwell.

The Core strategy also seeks 'to mitigate the impact on the existing network'. It is our belief as shown above that the network is already stretched too far. As a simple test, I would ask you to travel by car from Thorpe or Rectory Road and Rayleigh between 8.20 and 9.00am or to do the reverse journey at any time after 4.00pm, when you will queue from just past Hambro Hill until you turn left into Thorpe or Rectory Road. With 175 extra houses and 300 extra cars, we could find ourselves with the hair that breaks the Camel's back. For those travelling by public transport, the experience is made worse by the fact that there is only one bus per hour.

Finally, such a large scale development would lead to an unwelcome strip coalescence of built settlements which as you are aware, is not in line with Council Policy.

Would you please acknowledge receipt of this letter.

Summary:

We believe that the development of Hawkwell is unsustainable for a number of reasons, including (but not exclusively);

The increased car use causing even more congestion (it already takes up to five minutes to get out of Thorpe Road at peak times at peak times and then only when somebody 'lets you out'.

The inability to improve the highway as it is built up on either side.

Core Strategy Submission Document

15748 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

The lack of sufficient doctors or dentists to support the existing population let alone an increase.

The lack of additional school place and the fact that these schools are land locked so cannot expand.

In addition there are environmental issues, including;

Hawkwell is a semi rural environment and as such is unsuitable for development.

Such a large development would ruin the character of this village. The development would encroach on much needed green belt, when there are brown sites nearby that would actually benefit from development. We currently enjoy the benefit of a varied wildlife and they have a superb environment in which to thrive, exactly where it is proposed to create this development. Once the wildlife has been removed/killed it is gone for ever and our children will be the worse for not having the experience we can enjoy on a daily basis.

We are afraid that we can see no social economic or environmental benefits whatsoever. Apart from the points raised above, we will see more teenagers loitering in Clements Hall Park as they have nothing else to do.

In addition, the Core Strategy is unsound because it does not fulfil the principals that are expressly stated in that Core Strategy as it relates to Hawkwell as follows;

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Finally, such a large scale development would lead to an unwelcome strip coalescence of built settlements which as you are aware, is not in line with Council Policy.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 15749 - 14037 - Policy H2 - Extensions to residential envelopes and phasing - i

15749 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr and Mrs G E Short [14037]

Agent: N/A

Byeways
Ironwell Lane
Hawkwell
Essex
SS5 4JY

Full Text:

The proposal in the Rochford core strategy for this many houses in the ward of Hawkwell West is UNSOUND because the vital requirements of PPS12 are not met in terms of sustainability, and, therefore, the location of Hawkwell West should be removed by the inspector, and the allocation moved to a sustainable location.

The reasons for development in this locations is unsustainable under PPS12 are as follows,

Travel:

Limited public transport, increased car use causing heavy congestion, no scope to improve highways, distance from shops, distance from rail stations

Environment:

Semi-rural area unsuitable for large development, complete loss of character, loss of green belt, loss of wildlife, no social, economic or environmental benefits whatsoever.

In addition the core strategy is UNSOUND because it does not fulfil the principles that are expressly stated in the core strategy as it relates to the proposal for Hawkwell. Please see the following,

Protecting the character of existing settlements. Seeks to take advantage of development opportunities that will provide social, economic and environmental benefits. More housing within the existing settlements will adversely affect the present character.

We object to any houses being built off Rectory Road, and if you look in the front windows of houses lining the route and beyond, you will see a notice "No houses for Hawkwell" the vast majority it would seem agree with us.

The main reason why we object is the B1013 road from Rayleigh to Rochford splits at the Spa roundabout at Hockley, going east via Ashingdon and Golden Cross, and west via Hawkwell and the Cock Inn Pub, both roads coming together again at the Hall Road roundabout in Rochford.

The ONLY link between these two main roads is a MINOR road called Rectory Road, which for want of a better terminology is a rat run, add the cars of the existing settlement AND the cars going to and from Clements Hall Sports Centre, you have a very busy MINOR road.

The core strategy states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected,' surely the limit has been reached in Hawkwell West.

If you travel to work by train, Hawkwell West is the worst location to put new houses. We bought our bungalow 26 years ago, because we wanted a semi rural location, we ask the council not to allow the developers to infill our green belt with more homes.

Summary:

The proposal in the Rochford core strategy for this many houses in the ward of Hawkwell West is UNSOUND because the vital requirements of PPS12 are not met in terms of sustainability, and, therefore, the location of Hawkwell West should be removed by the inspector, and the allocation moved to a sustainable location.

The reasons for development in this locations is unsustainable under PPS12 are as follows,

Travel:

Limited public transport, increased car use causing heavy congestion, no scope to improve highways, distance from shops, distance from rail stations

Environment:

Semi-rural area unsuitable for large development, complete loss of character, loss of green belt, loss of wildlife, no social, economic or environmental benefits whatsoever.

In addition the core strategy is UNSOUND because it does not fulfil the principles that are expressly stated in the core strategy as it relates to the proposal for Hawkwell. Please see the following,

Protecting the character of existing settlements. Seeks to take advantage of development opportunities that will provide

Core Strategy Submission Document

15749 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

social, economic and environmental benefits. More housing within the existing settlements will adversely affect the present character.

We object to any houses being built off Rectory Road, and if you look in the front windows of houses lining the route and beyond, you will see a notice 'No houses for Hawkwell' the vast majority it would seem agree with us.

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The core strategy states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected,' surely the limit has been reached in Hawkwell West.

If you travel to work by train, Hawkwell West is the worst location to put new houses. We bought our bungalow 26 years ago, because we wanted a semi rural location, we ask the council not to allow the developers to infill our green belt with more homes.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 15752 - 8830 - Policy H2 - Extensions to residential envelopes and phasing - i

15752 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mrs Audrey Stemmmons [8830]

18 Victor Gardens
Hawkwell
SS5 4DR
England
01702 200572

Agent: N/A

Full Text: Development in semi-rural South Hawkwell of a further 175 dwellings within the next six years is unbelievable.

Summary: Development in semi-rural South Hawkwell of a further 175 dwellings within the next six years is unbelievable.

Change to Plan Such development of 175 dwellings within South Hawkwell within the next six years and any more beyond that should be out of the question and would be quite unsuitable for the area and its infrastructure.

Appear at exam? No

Soundness Tests i

Core Strategy Submission Document

O - 15757 - 14056 - Policy H2 - Extensions to residential envelopes and phasing - i

15757 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: D and E Reed [14056]

313 Rectory Road
Hawkwell
Hockley
Essex
SS5 4LA

Agent: N/A

Full Text:

The proposal in the Rochford Core Strategy for this many houses in the Ward of Hawkwell West is UNSOUND because the vital requirements of PPS12 are not met in terms of sustainability, and therefore, the location of Hawkwell West should be removed by The Inspector and the allocation moved to a sustainable location. In summary the reasons that development in this location is unsustainable under PPS12 are as follows:

TRAVEL

limited public transport
increased car use causing heavy congestion
inability to improve highways
distance from shops
distance from rail stations

ENVIRONMENT

semi rural location unsuitable for large development
complete loss of character
loss of green belt
loss of wildlife
NO social, economic or environmental benefits whatsoever.

In addition the Core Strategy is UNSOUND because it does not fulfil the principles that are expressly stated in the Core Strategy as it relates to the proposal for Hawkwell. Please see the following:

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of the existing settlement in Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

The Core Strategy says 'locate development in areas where alternatives to car use are more viable', 'reduce the requirement to travel', and accompany any development with requisite highway infrastructure to 'mitigate their impact on the existing network'. It is not possible to do this in Hawkwell West as there is no space for development of local roads, especially in Rectory Road, and any development here would increase the requirement to travel, especially by car. Moving on to Public Transport the Core Strategy states that 'planning should be well related to existing public transport where possible'. There is just one bus to and from Southend/Rayleigh per hour with no prospect of Arriva providing an appropriate service in the long term.

Such a large scale development would lead to an unwelcome strip coalescence of built settlements which is not in line with Council policy.

Summary:

The proposal in the Rochford Core Strategy for this many houses in the Ward of Hawkwell West is UNSOUND because the vital requirements of PPS12 are not met in terms of sustainability, and therefore, the location of Hawkwell West should be removed by The Inspector and the allocation moved to a sustainable location. In summary the reasons that development in this location is unsustainable under PPS12 are as follows:

TRAVEL

limited public transport
increased car use causing heavy congestion
inability to improve highways
distance from shops
distance from rail stations

ENVIRONMENT

semi rural location unsuitable for large development
complete loss of character
loss of green belt
loss of wildlife
NO social, economic or environmental benefits whatsoever.

Core Strategy Submission Document

15757 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

In addition the Core Strategy is UNSOUND because it does not fulfil the principles that are expressly stated in the Core Strategy as it relates to the proposal for Hawkwell. Please see the following:

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of the existing settlement in Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

The Core Strategy says 'locate development in areas where alternatives to car use are more viable', 'reduce the requirement to travel', and accompany any development with requisite highway infrastructure to 'mitigate their impact on the existing network'. It is not possible to do this in Hawkwell West as there is no space for development of local roads, especially in Rectory Road, and any development here would increase the requirement to travel, especially by car. Moving on to Public Transport the Core Strategy states that 'planning should be well related to existing public transport where possible'. There is just one bus to and from Southend/Rayleigh per hour with no prospect of Arriva providing an appropriate service in the long term.

Such a large scale development would lead to an unwelcome strip coalescence of built settlements which is not in line with Council policy.

Change to Plan

Appear at exam?	No	Soundness Tests	i
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Core Strategy Submission Document

O - 15758 - 9739 - Policy H2 - Extensions to residential envelopes and phasing - i, iii

15758 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: R G & M A Horn [9739]

24 Thorpe Road
Hawkwell
Essex
SS5 4EP

Agent: N/A

Full Text: Dear Sir,

Objection to Rochford Core Strategy, 175 houses in Hawkwell is UNSOUND.
Objection to Planning Application 330 houses by David Wilson Homes

The proposal in the Rochford Core Strategy for this many houses in Hawkwell West is Unsound, because the vital requirements of PPS12 are not met in terms of sustainability and thus this location should be removed by the Inspector, and moved to a sustainable location for the following reasons

Travel. There is very limited public transport. There will be an obvious increase in car use as the proposed sites are well away from schools and stations.

Environment. This area is Semi Rural and these proposals will completely change the character of the area, losing both greenbelt and wildlife. In effect it will no longer be Semi Rural.

The Core Strategy mentions protecting the character of existing settlements, and specifically 'seeks to take advantage of development opportunities that will provide Social, economic and environmental benefits'. If this proposal goes through exactly the opposite would apply.

It also states that 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. We in Hawkwell West have already gone past this limit.

The Core Strategy also says 'Locate developments in areas where alternatives to car use are more viable, reduce the requirement to travel, and accompany any development with requisite highway infrastructure, to mitigate their impact on the existing network'. How is this possible in this location? Where are the new roads going to be? The B1013 which is the only outlet for vehicles in this area is saturated with 16,000 vehicles a day which is already causing bottlenecks and tailbacks, plainly evident to us locals. The Core Strategy also states that 'planning should be related to existing public transport where possible. The bus service currently is one per hours in either direction.

Housing on this scale is in my opinion the creation of a 'concrete jungle'. Surely this is not Council policy?

Summary: Dear Sir,

Objection to Rochford Core Strategy, 175 houses in Hawkwell is UNSOUND.
Objection to Planning Application 330 houses by David Wilson Homes

The proposal in the Rochford Core Strategy for this many houses in Hawkwell West is Unsound, because the vital requirements of PPS12 are not met in terms of sustainability and thus this location should be removed by the Inspector, and moved to a sustainable location for the following reasons

Travel. There is very limited public transport. There will be an obvious increase in car use as the proposed sites are well away from schools and stations.

Environment. This area is Semi Rural and these proposals will completely change the character of the area, losing both greenbelt and wildlife. In effect it will no longer be Semi Rural.

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The Core Strategy also says 'Locate developments in areas where alternatives to car use are more viable, reduce the requirement to travel, and accompany any development with requisite highway infrastructure, to mitigate their impact on the existing network'. How is this possible in this location? Where are the new roads going to be? The B1013 which is the only outlet for vehicles in this area is saturated with 16,000 vehicles a day which is already causing bottlenecks and tailbacks, plainly evident to us locals. The Core Strategy also states that 'planning should be related to existing public transport where possible. The bus service currently is one per hours in either direction.

Housing on this scale is in my opinion the creation of a 'concrete jungle'. Surely this is not Council policy?

Core Strategy Submission Document

O - 15758 - 9739 - Policy H2 - Extensions to residential envelopes and phasing - i, iii

15758 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Change to Plan This location should be removed by the Inspector, and moved to a sustainable location

Appear at exam? Not Specified **Soundness Tests** i, iii

Core Strategy Submission Document

O - 15760 - 9650 - Policy H2 - Extensions to residential envelopes and phasing - i

15760 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr D Miles [9650]

1 Royer Close
Hawkwell
Hockley
Essex
SS5 4LR

Agent: N/A

Full Text: Objection to Rochford Core Strategy, 175 houses in Hawkwell is UNSOUND

I would refer to the above proposal and would like to register my objections to same.

The proposal in the Rochford Core Strategy for this many houses in the Ward of Hawkwell West is UNSOUND because the vital requirements of PPS12 are not met in terms of sustainability and, therefore, the location of Hawkwell West (South Hawkwell) should be removed by The Inspector and the allocation moved to a sustainable location. In summary, the reasons that development in this location is unsustainable under PPS12 are as follows:

Travel

- limited public transport
- increased car use causing heavy congestion
- inability to improve highways
- distance from shops
- distance from rail stations

I would expand upon these points in the order that they are written:

As you are well aware, Arriva in their infinite wisdom, decided to cut the No 8 bus service to one an hour albeit with it now continuing on to Rayleigh. The last weekday bus in the direction of Southend is 18:17 with the last weekday bus to Rayleigh being 18:48. Clearly there is not a regular enough service for existing usage so any additional housing will only serve to exacerbate the situation. Furthermore, the first bus after 09:00 is often full due to it being the first bus of the day that can be used by those availing themselves of the free bus pass scheme. Again, any additional housing will only serve to exacerbate the problem.

I would suggest that increased car use is, although not exclusively, directly related to the above bus situation. There is already heavy congestion at both ends of Rectory Road at peak times and any additional housing can only make matters worse. It is also important to note that the small row of shops in Main Road incorporating the Co-op is already often overcrowded resulting in vehicles blocking the traffic flow on the main road due to people queuing to gain access to the relatively small car park. This is further evidenced by people parking in the adjacent bus stop which has recently been the subject of parking tickets being issued by the Council. Further vehicular traffic will only magnify the existing problem.

I believe the question of an inability to improve highways has already been properly dealt with by Councillor John Mason, amongst others.

The distance from the shops is self-evident.

The distance from rail stations is self-evident.

Environment

- semi rural location unsuitable for large development
- complete loss of character
- loss of green belt
- loss of wildlife
- No social, economic or environment benefits whatsoever

In addition, the Core Strategy is unsound because it does not fulfill the principles that are expressly stated in the Core Strategy as it relates to the proposal for Hawkwell. Please see the following:

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economical and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of the existing settlement in Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

Core Strategy Submission Document

O - 15760 - 9650 - Policy H2 - Extensions to residential envelopes and phasing - i

15760 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

The Core Strategy says 'locate development in areas where alternatives to car use is more viable', 'reduce the requirement to travel', and accompany any development with requisite highway infrastructure to 'mitigate their impact on the existing network'. It is not possible to do this in Hawkwell West as there is no space for development of local roads, especially in Rectory Road and any development here would increase the requirement to travel, especially by car. Moving on to Public Transport, the Core Strategy states that 'planning should be well related to existing public transport where possible'. There is just one bus to and from Southend/Rayleigh per hour with no prospect of Arriva providing an appropriate service in the long term (some of these points I have dealt with above under the 'Travel' heading).

Finally, such a large scale development would lead to an unwelcome strip coalescence of built settlements which is not in line with Council policy.

Summary:

In summary, the reasons that development in this location is unsustainable under PPS12 are as follows:

Travel

- limited public transport
- increased car use causing heavy congestion
- inability to improve highways
- distance from shops
- distance from rail stations

I would expand upon these points in the order that they are written:

As you are well aware, Arriva in their infinite wisdom, decided to cut the No 8 bus service to one an hour albeit with it now continuing on to Rayleigh. The last weekday bus in the direction of Southend is 18:17 with the last weekday bus to Rayleigh being 18:48. Clearly there is not a regular enough service for existing usage so any additional housing will only serve to exacerbate the situation. Furthermore, the first bus after 09:00 is often full due to it being the first bus of the day that can be used by those availing themselves of the free bus pass scheme. Again, any additional housing will only serve to exacerbate the problem.

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I believe the question of an inability to improve highways has already been properly dealt with by Councillor John Mason, amongst others.

The distance from the shops is self-evident.

The distance from rail stations is self-evident.

Environment

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- loss of wildlife
- No social, economic or environment benefits whatsoever

In addition, the Core Strategy is unsound because it does not fulfill the principles that are expressly stated in the Core Strategy as it relates to the proposal for Hawkwell. Please see the following:

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The Core Strategy says 'locate development in areas where alternatives to car use is more viable', 'reduce the requirement to travel', and accompany any development with requisite highway infrastructure to 'mitigate their impact on the existing network'. It is not possible to do this in Hawkwell West as there is no space for development of local roads, especially in Rectory Road and any development here would increase the requirement to travel, especially by car. Moving on to Public Transport, the Core Strategy states that 'planning should be well related to existing public transport where possible'. There is just one bus to and from Southend/Rayleigh per hour with no prospect of Arriva providing an

Core Strategy Submission Document

O - 15760 - 9650 - Policy H2 - Extensions to residential envelopes and phasing - i

15760 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

appropriate service in the long term (some of these points I have dealt with above under the 'Travel' heading).

Finally, such a large scale development would lead to an unwelcome strip coalescence of built settlements which is not in line with Council policy.

Change to Plan The location of Hawkwell West (South Hawkwell) should be removed by The Inspector and the allocation moved to a sustainable location.

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 15761 - 9797 - Policy H2 - Extensions to residential envelopes and phasing - i

15761 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr & Mrs J Cutts [9797]

21 Sweyne Avenue
Hawkwell
Essex
SS5 4LB

Agent: N/A

Full Text:

The proposal in Rochford Core Strategy for this many houses in the Ward of Hawkwell West is UNSOUND because the vital requirements of PPS12 are not met in terms of sustainability, and, therefore, the location of Hawkwell West (south Hawkwell) should be removed by The Inspector and the allocation moved to an area that will sustain the development.

To summarise: The reasons this development in this location under PPS12 in this location are:-

Travel
Public transport limited
Road congestion due to increased car usage
No room to improve highways
Too far from local shops
Too far from rail stations

Environmental Issues
Complete loss of local character
A semi rural location which is unsuitable for such a large development
There will be a loss of wildlife
There will certainly be a loss of green belt
There will be NO economic, social or environmental benefit whatsoever for the local population

The Core Strategy is UNSOUND because it does not fulfil the principles that are expressly stated in the Core Strategy in relation to the proposal for Hawkwell.

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of the existing settlement in Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

The Core Strategy says 'locate development in areas where alternatives to car use are more viable', 'reduce the requirement to travel', and accompany any with the requisite highway infrastructure to 'mitigate their impact on the existing network'.

It is not possible to do this in Hawkwell West as there is no space for the development of local roads, especially in Rectory Road, as any development here would increase the requirement to travel, especially by car. Moving on to Public Transport the Core Strategy states that 'planning should be well related to existing public transport where possible' There is just one bus to and from Southend/Rayleigh per hour with no prospect of Arriva providing an appropriate service in the long term.

Finally, such a large scale development would lead to an unwelcome strip coalescence of built settlements which is not in line with Council policy.

Summary:

To summarise: The reasons this development in this location under PPS12 in this location are:-

Travel
Public transport limited
Road congestion due to increased car usage
No room to improve highways
Too far from local shops
Too far from rail stations

Environmental Issues
Complete loss of local character
A semi rural location which is unsuitable for such a large development
There will be a loss of wildlife
There will certainly be a loss of green belt
There will be NO economic, social or environmental benefit whatsoever for the local population

The Core Strategy is UNSOUND because it does not fulfil the principles that are expressly stated in the Core Strategy in relation to the proposal for Hawkwell.

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of the existing settlement in Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain

Core Strategy Submission Document

O - 15761 - 9797 - Policy H2 - Extensions to residential envelopes and phasing - i

15761 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

The Core Strategy says 'locate development in areas where alternatives to car use are more viable', 'reduce the requirement to travel', and accompany any with the requisite highway infrastructure to 'mitigate their impact on the existing network'.

It is not possible to do this in Hawkwell West as there is no space for the development of local roads, especially in Rectory Road, as any development here would increase the requirement to travel, especially by car. Moving on to Public Transport the Core Strategy states that 'planning should be well related to existing public transport where possible' There is just one bus to and from Southend/Rayleigh per hour with no prospect of Arriva providing an appropriate service in the long term.

Finally, such a large scale development would lead to an unwelcome strip coalescence of built settlements which is not in line with Council policy.

Change to Plan The location of Hawkwell West (south Hawkwell) should be removed by The Inspector and the allocation moved to an area that will sustain the development

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 15762 - 14014 - Policy H2 - Extensions to residential envelopes and phasing - i

15762 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: mr frank harvey [14014]

19 hockley rise
hockley
ss5 4pt

Agent: N/A

Full Text: i want to register an appeal against 2 developments Rochford core strategy 175 houses in Hawkwell on the following grounds

1) it is unsound because the vital requirements pps 12 are not met because of unsustainability

TRAVEL-- limited public transport
increased car use causing even more congestion/pollution inability to improve highways distance from shops distance from train stations

ENVIRONMENT--semi rural location unsuitable for large development complete loss of character loss of green belt loss of wildlife NO social,economic or environmental benefits whatsoever

Summary: It is unsound because the vital requirements pps 12 are not met because of unsustainability

TRAVEL-- limited public transport
increased car use causing even more congestion/pollution inability to improve highways distance from shops distance from train stations

ENVIRONMENT--semi rural location unsuitable for large development complete loss of character loss of green belt loss of wildlife NO social,economic or environmental benefits whatsoever

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 15763 - 7805 - Policy H2 - Extensions to residential envelopes and phasing - i

15763 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr Lionel Barratt [7805]

Agent: N/A

184 Main Road
Hawkwell
Hockley
Essex
SS5 4EH
England

Full Text:

Sirs,
Objection to Rochford Core Strategy, 175 houses in Hawkwell is UNSOUND

The proposal in Rochford Core Strategy for this many houses in the Ward of Hawkwell West is UNSOUND because the vital requirements of PPS 12 are not met in terms of sustainability, and therefore the location of Hawkwell West (South Hawkwell) should be removed by the Inspector and the allocation moved to a sustainable location.

In summary the reasons that development in this location is unsustainable under PPS 12 are:-

Travel

Limited public transport
Increased car use causing heavy congestion
Inability to improve highways
Distance from shops
Distance from rail stations

Environment

Semi-rural location unsuitable for large development
Complete loss of character
Loss of Green Belt
Loss of wildlife
NO social, economic or environmental benefits whatsoever

In addition, the Core Strategy is UNSOUND because it does not fulfil the principles that are expressly stated in the Core Strategy as it relates to the proposal for Hawkwell, namely -

The Core Strategy

'Seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'

'locate development in areas where alternatives to car use are more viable'

'accompany any development with requisite highway infrastructure to mitigate their impact on the existing network'

No such benefits apply and any development would be detrimental to the character of the existing settlement in Hawkwell West.

I therefore object to the proposal in the strongest possible terms.

Summary:

In summary the reasons that development in this location is unsustainable under PPS 12 are:-

Travel

Limited public transport
Increased car use causing heavy congestion
Inability to improve highways
Distance from shops
Distance from rail stations

Environment

Semi-rural location unsuitable for large development
Complete loss of character
Loss of Green Belt
Loss of wildlife

Core Strategy Submission Document

O - 15763 - 7805 - Policy H2 - Extensions to residential envelopes and phasing - i

15763 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

NO social, economic or environmental benefits whatsoever

In addition, the Core Strategy is UNSOUND because it does not fulfil the principles that are expressly stated in the Core Strategy as it relates to the proposal for Hawkwell, namely -

The Core Strategy

'Seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'

'locate development in areas where alternatives to car use are more viable'

'accompany any development with requisite highway infrastructure to mitigate their impact on the existing network'

No such benefits apply and any development would be detrimental to the character of the existing settlement in Hawkwell West.

I therefore object to the proposal in the strongest possible terms.

Change to Plan The location of Hawkwell West (South Hawkwell) should be removed by the Inspector and the allocation moved to a sustainable location.

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 15768 - 14062 - Policy H2 - Extensions to residential envelopes and phasing - i

15768 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Joyce Evans and Reg Crocker [14062]

10 Windsor Gardens
Hawkwell
Essex

Agent: N/A

Full Text:

NO !!!! to the above, I have voiced my concerns before!! why is no attention being paid to this issue ???
I object as the proposal is unsound for lots and lots of reasons !!
New housing in Hawkwell is a bad move and will cause untold problems in the future as it is not a sustainable location.
The vital requirements of PPS12 are not met.
This semi rural location is unsuitable for a large development and has no social, economic or enviromental benefits whatsoever!
And would detract from the existing character of this lovely location and disturb the precious wildlife.
Please add my comments to what I am sure is already an ever growing list,

I hope to here some kind of positive response soon.

Summary:

I object as the proposal is unsound for lots and lots of reasons !!
New housing in Hawkwell is a bad move and will cause untold problems in the future as it is not a sustainable location.
The vital requirements of PPS12 are not met.
This semi rural location is unsuitable for a large development and has no social, economic or enviromental benefits whatsoever!
And would detract from the existing character of this lovely location and disturb the precious wildlife.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 15770 - 14063 - Policy H2 - Extensions to residential envelopes and phasing - i

15770 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Davina Orrock [14063]

263 Main Road
Hawkwell
Hockley
Essex
SS5 4NR

Agent: N/A

Full Text:

Objection to Rochford Core Strategy 175 houses in Hawkwell
Objection to planning application 330 houses by David Wilson homes

The proposal in the Rochford Core Strategy for this many houses in the Ward of Hawkwell is UNSOUND because the vital requirements of PPS12 are not met in terms of sustainability, and, therefore, the location of Hawkwell West should be removed by the Inspector and the allocation moved to a sustainable location. In summary the reasons that development in this location is unsustainable under PPS12 are as follows:-

Travel

Limited public transport, increased car use causing heavy congestion, (I live on the B1013 and the traffic has increased greatly since I moved here in 1993, many road accidents and nearly every day it can take me 10-15 minutes to leave my driveway onto the B1013.

Inability to improve highways, distance from shops, distance from rail stations.

Environment

Semi rural location unsuitable for large development

Complete loss of character

Loss of green belt

Loss of wildlife

No social, economic or environmental benefits whatsoever

In addition the Core Strategy is UNSOUND because it does not fulfil the principles that are expressly stated in the Core Strategy as it relates to the proposal for Hawkwell.

Finally such a large scale development would lead to an unwelcome strip coalescence of built settlements which is not in line with Council policy. Additionally we live across from Hawkwell Common and the council is aware of the youth problems and anti social behaviour in our area from Clements Hall through to Spa Road.

Summary:

The proposal in the Rochford Core Strategy for this many houses in the Ward of Hawkwell is UNSOUND because the vital requirements of PPS12 are not met in terms of sustainability, and, therefore, the location of Hawkwell West should be removed by the Inspector and the allocation moved to a sustainable location. In summary the reasons that development in this location is unsustainable under PPS12 are as follows:-

Travel

Limited public transport, increased car use causing heavy congestion, (I live on the B1013 and the traffic has increased greatly since I moved here in 1993, many road accidents and nearly every day it can take me 10-15 minutes to leave my driveway onto the B1013.

Inability to improve highways, distance from shops, distance from rail stations.

Environment

Semi rural location unsuitable for large development

Complete loss of character

Loss of green belt

Loss of wildlife

No social, economic or environmental benefits whatsoever

In addition the Core Strategy is UNSOUND because it does not fulfil the principles that are expressly stated in the Core Strategy as it relates to the proposal for Hawkwell.

Finally such a large scale development would lead to an unwelcome strip coalescence of built settlements which is not in line with Council policy. Additionally we live across from Hawkwell Common and the council is aware of the youth problems and anti social behaviour in our area from Clements Hall through to Spa Road.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 15772 - 14047 - Policy H2 - Extensions to residential envelopes and phasing - i

15772 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mrs Madeleine Arney [14047]

11 Woodwide Chase
Hawkwell
Essex,
ss5 4nb

Agent: N/A

Full Text:

I understand that you are wanting public views about the above and I would like to make objections on various counts

1. Objection to Rochford Core Strategy of 175 houses in Hawkwell is unsound because the vital requirements of PPS12 are not met in terms of sustainability and therefore the location of Hawkwell West should be removed by The Inspector. It is unsustainable under the PPS12 as follows:

Travel - we have very limited public transport and even buses are often cut out for no reason

- increase of cars, I often have problems trying to get out of Poplars Avenue due to the amount of cars now
- inability to improve highways
- distance from shops and railway

Environment - semi rural location unsuitable for large development

- loss of character
- loss of green belt (green belt was protected by past governments and even if it is only 1% now what about the percentages taken in future. Green belt is sacrosanct! (You should be congratulated on saving so much in this area in the past).
- loss of wildlife
- NO social, economic or environmental benefits whatsoever

2. Objection to Planning Application of 330 houses by David Wilson Homes

3. Objection to unelected East of England Regional Assembly making decisions on our behalf.

Summary:

It is unsustainable under the PPS12 as follows:

Travel - we have very limited public transport and even buses are often cut out for no reason

- increase of cars, I often have problems trying to get out of Poplars Avenue due to the amount of cars now
- inability to improve highways
- distance from shops and railway

Environment - semi rural location unsuitable for large development

- loss of character
- loss of green belt (green belt was protected by past governments and even if it is only 1% now what about the percentages taken in future. Green belt is sacrosanct! (You should be congratulated on saving so much in this area in the past).
- loss of wildlife
- NO social, economic or environmental benefits whatsoever

Change to Plan

The location of Hawkwell West should be removed by The Inspector

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 15784 - 9465 - Policy H2 - Extensions to residential envelopes and phasing - i

15784 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: David Mullen [9465]

34, Uplands Road, Hawkwell, Hockley, Essex
SS5 4DH

Agent: N/A

Full Text:

I am writing to object to the proposal, in the Rochford Core Strategy, to erect 175 new houses in Hawkwell because this many houses in the Ward of Hawkwell West is unsound. It (the proposal) does not meet the vital requirements of PPS12 (the Governments Planning Policy) in terms of sustainability, and therefore the location of Hawkwell West should be removed by the Inspector and the allocation moved to a sustainable location.

To summarise; the reasons the reasons that development in this location is unsustainable under PPS12 are as follows:
TRAVEL: public transport is very limited, (in fact pretty hopeless), therefore the development will lead to severely increased car usage and the inevitable jams during busy times, (check out Cherry Orchard Way in the mornings). The new houses are also a considerable distance from the shops and the Railway Station and a large proportion of local people commute to London so can you imagine the chaos during the commuter time/school time period? Additional roads may help but we don't have the ability to improve our local highways.

ENVIRONMENT: Hawkwell West is a semi-rural location which is clearly unsuitable for a large development. The loss of greenbelt will result in an inevitable proportionate loss of wildlife, and the character of Hawkwell will disappear with no social, economic or environmental benefit whatsoever. There are NO plusses to this development!!

The Core Strategy talks about protecting the character of existing settlements and specifically "seeks to take advantage of development opportunities that will provide, social, economic and environmental benefits". No such benefits would apply to this location, in fact, the development would be detrimental to the existing settlement of West Hawkwell!!! It also states that "there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected". This limit has already been exceeded in Hawkwell West. In fact the council is already in arrears with it's legal obligation to provide allotments in the area.

The Core Strategy also says "locate development in areas where alternative to car use are more viable", "reduce the requirement to travel" and accompany any development with requisite highway infrastructure to "mitigate their impact on the existing network". There is no space for the development of local roads, especially in Rectory Road, therefore the development will have the opposite effect and considerably increase the requirement to travel, (particularly by car). moving on to public transport, the Core Strategy states that "planning should be well related to existing public transport where possible". There is just one bus to and from Rayleigh/Southend per hour, (which stops in the early evening) and no prospect of Arriva providing an appropriate service in the long term.

Finally, such a large scale development would lead to an unwelcome strip coalescence of built settlements which is not in line with Council Policy.

Summary:

To summarise; the reasons the reasons that development in this location is unsustainable under PPS12 are as follows:
TRAVEL: public transport is very limited, (in fact pretty hopeless), therefore the development will lead to severely increased car usage and the inevitable jams during busy times, (check out Cherry Orchard Way in the mornings). The new houses are also a considerable distance from the shops and the Railway Station and a large proportion of local people commute to London so can you imagine the chaos during the commuter time/school time period? Additional roads may help but we don't have the ability to improve our local highways.

ENVIRONMENT: Hawkwell West is a semi-rural location which is clearly unsuitable for a large development. The loss of greenbelt will result in an inevitable proportionate loss of wildlife, and the character of Hawkwell will disappear with no social, economic or environmental benefit whatsoever. There are NO plusses to this development!!

The Core Strategy talks about protecting the character of existing settlements and specifically "seeks to take advantage of development opportunities that will provide, social, economic and environmental benefits". No such benefits would apply to this location, in fact, the development would be detrimental to the existing settlement of West Hawkwell!!! It also states that "there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected". This limit has already been exceeded in Hawkwell West. In fact the council is already in arrears with it's legal obligation to provide allotments in the area.

The Core Strategy also says "locate development in areas where alternative to car use are more viable", "reduce the requirement to travel" and accompany any development with requisite highway infrastructure to "mitigate their impact on the existing network". There is no space for the development of local roads, especially in Rectory Road, therefore the development will have the opposite effect and considerably increase the requirement to travel, (particularly by car). moving on to public transport, the Core Strategy states that "planning should be well related to existing public transport where possible". There is just one bus to and from Rayleigh/Southend per hour, (which stops in the early evening) and no prospect of Arriva providing an appropriate service in the long term.

Finally, such a large scale development would lead to an unwelcome strip coalescence of built settlements which is not in line with Council Policy.

Change to Plan The location of Hawkwell West should be removed by the Inspector and the allocation moved to a sustainable location.

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

Core Strategy Submission Document

O - 15784 - 9465 - Policy H2 - Extensions to residential envelopes and phasing - i

15784 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 15786 - 14068 - Policy H2 - Extensions to residential envelopes and phasing - i

15786 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr and Mrs K Ward [14068]

7 Thorpe Close
Hawkwell
Essex
SS5 4ER

Agent: N/A

Full Text: OBJECTIONS TO ROCHFORD CORE STRATEGY - 175 houses in Hawkwell

The proposal in the 'Rochford Core Strategy' for this many houses in the Ward of Hawkwell West is UNSOUND because the vital requirements are not met in terms of sustainability, and therefore the proposed location is totally unsuitable. The reasons for our objections are.

1. Public transport is very limited, being one bus per hour from Southend to Rayleigh going through Hawkwell., and there is no prospect of this being changed for the better!! There would be an increased use of cars causing more congestion on the already busy roads. We are constantly being reminded about using alternatives to car use, but the distance from the railway station is too far for most people to walk. The distance from shops makes it necessary to use a car. The present roads are already saturated and not suitable for improvement.
2. Our semi rural location, is unsuitable for a large development. The building of so many dwellings would adversely affect the whole area. We would lose the character of our 'village', along with the green belt, trees and wildlife, some of which are rare species. The proposed tiny amount of green land would not be enough to relocate the wildlife.
3. I can see no social, economic or environmental benefits of such a development.

Please consider our objections. Thank you.

Summary:

1. Public transport is very limited, being one bus per hour from Southend to Rayleigh going through Hawkwell., and there is no prospect of this being changed for the better!! There would be an increased use of cars causing more congestion on the already busy roads. We are constantly being reminded about using alternatives to car use, but the distance from the railway station is too far for most people to walk. The distance from shops makes it necessary to use a car. The present roads are already saturated and not suitable for improvement.
2. Our semi rural location, is unsuitable for a large development. The building of so many dwellings would adversely affect the whole area. We would lose the character of our 'village', along with the green belt, trees and wildlife, some of which are rare species. The proposed tiny amount of green land would not be enough to relocate the wildlife.
3. I can see no social, economic or environmental benefits of such a development.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 15787 - 9733 - Policy H2 - Extensions to residential envelopes and phasing - i

15787 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr R Hackett [9733]

106 Main Road
Hawkwell
Essex
SS5 4ES

Agent: N/A

Full Text: Objection to Rochford Core Strategy, 175 houses in Hawkwell is UNSOUND

The proposal in the Rochford Core Strategy for this many houses in the Ward of Hawkwell West is UNSOUND because the vital requirements of PPS12 are not met in terms of sustainability, and, therefore, the location of Hawkwell West (South Hawkwell) should be removed by The Inspector and the allocation moved to a sustainable location. In summary the reasons that development in this location is unsustainable under PPS12 are as follows:

Travel

limited public transport
increased car use causing heavy congestion
inability to improve highways
distance from shops
distance from rail stations
Environment

semi rural location unsuitable for large development
complete loss of character
loss of green belt
loss of wildlife

NO social, economic or environmental benefits whatsoever

In addition the Core Strategy is UNSOUND because it does not fulfil the principles that are expressly stated in the Core Strategy as it relates to the proposal for Hawkwell. Please see the following:

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of the existing settlement in Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

The Core Strategy says 'locate development in areas where alternatives to car use are more viable', 'reduce the requirement to travel' and accompany any development with requisite highway infrastructure to 'mitigate their impact on the existing network'. It is not possible to do this in Hawkwell West as there is no space for development of local roads, especially in Rectory Road, and any development here would increase the requirement to travel, especially by car. Moving on to Public Transport the Core Strategy states that 'planning should be well related to existing public transport where possible'. There is just one bus to and from Southend/Rayleigh per hour with no prospect of Arriva providing an appropriate service in the long term.

Finally, such a large scale development would lead to an unwelcome strip coalescence of built settlements which is not in line with Council policy

Summary: In summary the reasons that development in this location is unsustainable under PPS12 are as follows:

Travel

limited public transport
increased car use causing heavy congestion
inability to improve highways
distance from shops
distance from rail stations
Environment

semi rural location unsuitable for large development
complete loss of character
loss of green belt
loss of wildlife

NO social, economic or environmental benefits whatsoever

In addition the Core Strategy is UNSOUND because it does not fulfil the principles that are expressly stated in the Core Strategy as it relates to the proposal for Hawkwell. Please see the following:

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would

Core Strategy Submission Document

15787 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

apply to this location and development would be materially detrimental to the character of the existing settlement in Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

The Core Strategy says 'locate development in areas where alternatives to car use are more viable', 'reduce the requirement to travel' and accompany any development with requisite highway infrastructure to 'mitigate their impact on the existing network'. It is not possible to do this in Hawkwell West as there is no space for development of local roads, especially in Rectory Road, and any development here would increase the requirement to travel, especially by car. Moving on to Public Transport the Core Strategy states that 'planning should be well related to existing public transport where possible'. There is just one bus to and from Southend/Rayleigh per hour with no prospect of Arriva providing an appropriate service in the long term.

Finally, such a large scale development would lead to an unwelcome strip coalescence of built settlements which is not in line with Council policy.

Change to Plan The location of Hawkwell West (South Hawkwell) should be removed by The Inspector and the allocation moved to a sustainable location

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 15789 - 14057 - Policy H2 - Extensions to residential envelopes and phasing - i

15789 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr and Mrs Keene [14057]

7 Spencers
Hawkwell
Hockley
Essex
SS5 4LW

01702 207340

Agent: N/A

Full Text:

The proposal in the Rochford Core Strategy (this is the RDC Policy for local development) for this many houses in the Ward of Hawkwell West is UNSOUND because the vital requirements of PPS12 (this is the Government's Planning Policy) are not met in terms of sustainability, and therefore, the location of Hawkwell West (South Hawkwell) should be removed by The Inspector and the allocation moved to a sustainable location. In summary the reasons that development in this location is unsustainable under PPS12 are as follows:

Regarding the proposed 175 new homes for Hawkwell, Essex.

As residents of Hawkwell and knowing the traffic problems we endure on a daily basis, the increase in housing will cause heavy congestion especially with the limited public transport in our area, also the inability to improve the highways. The distance from the shops and the railway station will cause the new inhabitants to use their cars.

Our semi rural location is completely unsuitable for such a large development resulting in a loss of character. We will lose even more green belt and wild life. Later with the inability of other countries to provide our country with food this land will be needed for agriculture.

This development will leave our community with no social, economic or environmental benefits whatsoever.

In addition the Core Strategy is UNSOUND because it does not fulfil the principles that are expressly stated in the Core Strategy as it relates to the proposal for Hawkwell. Please see the following:

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of the existing settlement in Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

The Core Strategy says 'locate development in areas where alternatives to car use are more viable', 'reduce the requirement to travel', and accompany any development with requisite highway infrastructure to 'mitigate their impact on the existing network'. It is not possible to do this in Hawkwell West as there is no space for development of local roads, especially in Rectory Road, and any development here would increase the requirement to travel, especially by car. Moving on to Public Transport the Core Strategy states that 'planning should be well related to existing public transport where possible'. There is just one bus to and from Southend/Rayleigh per hour with no prospect of Arriva providing an appropriate service in the long term.

Finally such a large scale development would lead to an unwelcome strip coalescence of built settlements, which is not in line with Council policy.

Summary:

As residents of Hawkwell and knowing the traffic problems we endure on a daily basis, the increase in housing will cause heavy congestion especially with the limited public transport in our area, also the inability to improve the highways. The distance from the shops and the railway station will cause the new inhabitants to use their cars.

Our semi rural location is completely unsuitable for such a large development resulting in a loss of character. We will lose even more green belt and wild life. Later with the inability of other countries to provide our country with food this land will be needed for agriculture.

This development will leave our community with no social, economic or environmental benefits whatsoever.

In addition the Core Strategy is UNSOUND because it does not fulfil the principles that are expressly stated in the Core Strategy as it relates to the proposal for Hawkwell. Please see the following:

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of the existing settlement in Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

The Core Strategy says 'locate development in areas where alternatives to car use are more viable', 'reduce the requirement to travel', and accompany any development with requisite highway infrastructure to 'mitigate their impact on the existing network'. It is not possible to do this in Hawkwell West as there is no space for development of local roads,

Core Strategy Submission Document

O - 15789 - 14057 - Policy H2 - Extensions to residential envelopes and phasing - i

15789 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

especially in Rectory Road, and any development here would increase the requirement to travel, especially by car. Moving on to Public Transport the Core Strategy states that 'planning should be well related to existing public transport where possible'. There is just one bus to and from Southend/Rayleigh per hour with no prospect of Arriva providing an appropriate service in the long term.

Finally such a large scale development would lead to an unwelcome strip coalescence of built settlements, which is not in line with Council policy.

Change to Plan The location of Hawkwell West (South Hawkwell) should be removed by The Inspector and the allocation moved to a sustainable location.

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 15790 - 8435 - Policy H2 - Extensions to residential envelopes and phasing - i, ii, iii

15790 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr Andrew Allen [8435]

36 connaught road,
Rayleigh
ss68ux
uk

Agent: N/A

Full Text:

RDC's strategy proposes a limited number of very large sites around existing settlements. A more suitable approach would be to direct the new H2 housing requirement to a larger number of smaller sites around existing settlements. This would have the following benefits:

- higher reuse of existing infrastructure as opposed to having to provide new infrastructure
 - the increase in traffic load resulting from new housing would be spread around each settlement as opposed to concentrating it into new areas.
 - better integration into the existing housing areas
- Why are large sites more preferable to smaller sites? Where is the evidence?

Summary:

RDC's strategy proposes a limited number of very large sites around existing settlements. A more suitable approach would be to direct the new H2 housing requirement to a larger number of smaller sites around existing settlements. This would have the following benefits:

- higher reuse of existing infrastructure as opposed to having to provide new infrastructure
 - the increase in traffic load resulting from new housing would be spread around each settlement as opposed to concentrating it into new areas.
 - better integration into the existing housing areas
- Why are large sites more preferable to smaller sites? Where is the evidence?

Change to Plan

Provide evidence as to why larger development areas are more preferable to smaller development areas.

Appear at exam? Yes

Soundness Tests

i, ii, iii

Core Strategy Submission Document

O - 15791 - 8435 - Policy H2 - Extensions to residential envelopes and phasing - i, ii, iii

15791 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr Andrew Allen [8435]

36 connaught road,
Rayleigh
ss68ux
uk

Agent: N/A

Full Text: Why is North London Road, Rayleigh the ONLY site in Rayleigh where future housing development is appropriate. No evidence has been provided. An attempt was made in the preferred options document to detail why areas of Rayleigh were less desirable. The consideration for South East Rayleigh development was that it would cause coalescence and accessibility problems for services. This is not true for all sites submitted in this area and I believe that sites submitted would be more beneficial than the proposed North London Road site in Rayleigh. Where is the evidence that each site has been properly considered?

Summary: Why is North London Road, Rayleigh the ONLY site in Rayleigh where future housing development is appropriate. No evidence has been provided. An attempt was made in the preferred options document to detail why areas of Rayleigh were less desirable. The consideration for South East Rayleigh development was that it would cause coalescence and accessibility problems for services. This is not true for all sites submitted in this area and I believe that sites submitted would be more beneficial than the proposed North London Road site in Rayleigh. Where is the evidence that each site has been properly considered?

Change to Plan The report should detail the process that was employed to identify the North London Road site as the "best" for development. It should also detail the reasons why it is the only site considered for housing development. RDC should also consider each submitted site on its own merits and not make assumptions such as all sites submitted in SE rayleigh would cause coalescence and service accessibility problems. Provide the evidence and demonstrate diligence!

Appear at exam? Yes

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 15793 - 14069 - Policy H2 - Extensions to residential envelopes and phasing - i

15793 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr and Mrs Lockwood [14069]

167 Main Road
Hawkwell
Essex
SS5 4EJ

Agent: N/A

Full Text: Objection to Rochford Core Strategy, 175 houses in Hawkwell is UNSOUND.

We wish to bring to your notice our objections of the above proposal on the following grounds:-

TRAVEL

Public transport limited (1 bus per hour which stops running after 6.30 p.m.)
Increased car use on an already busy road.
Rectory Road is very narrow and winding with no possibility to improve, and Main Road is also heavily used.
The shops are a great distance from the site.
Both Hockley and Rochford railway stations are a great distance to the site.

ENVIRONMENT

Semi rural location unsuitable for large development
Complete loss of character. Hawkwell has already seen large scale development in Hill Lane area, Bosworth Close, Spencers Nursery etc.
Loss of more Green Belt land.
Disturbance and loss of wildlife.
NO benefits to the community, economic, social or environmental.

SERVICES

Schools, Doctors, Dentists, Sewage, water are all already over-stretched.

We hope you will take all these things into consideration and alter your Core Strategy.

Summary:

TRAVEL

Public transport limited (1 bus per hour which stops running after 6.30 p.m.)
Increased car use on an already busy road.
Rectory Road is very narrow and winding with no possibility to improve, and Main Road is also heavily used.
The shops are a great distance from the site.
Both Hockley and Rochford railway stations are a great distance to the site.

ENVIRONMENT

Semi rural location unsuitable for large development
Complete loss of character. Hawkwell has already seen large scale development in Hill Lane area, Bosworth Close, Spencers Nursery etc.
Loss of more Green Belt land.
Disturbance and loss of wildlife.
NO benefits to the community, economic, social or environmental.

SERVICES

Schools, Doctors, Dentists, Sewage, water are all already over-stretched.

We hope you will take all these things into consideration and alter your Core Strategy.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 15794 - 8435 - Policy H2 - Extensions to residential envelopes and phasing - i, ii, iii

15794 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr Andrew Allen [8435]

36 connaught road,
Rayleigh
ss68ux
uk

Agent: N/A

Full Text: Many of the preferred locations would involve the development of agricultural land. Given that the the government has identified that we will need to grow more domestically and import less food, how can the sites choosen on productive grade 1 agricultural land be justified?

Summary: Many of the preferred locations would involve the development of agricultural land. Given that the the government has identified that we will need to grow more domestically and import less food, how can the sites choosen on productive grade 1 agricultural land be justified?

Change to Plan Provide evidence and proof of RDC dilligence to enable meaningful public scrutiny

Appear at exam? Yes

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 15795 - 14070 - Policy H2 - Extensions to residential envelopes and phasing - i

15795 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr and Mrs Pickering [14070]

16 Spencers
Hawkwell
Hockley
Essex
SS5 4LW

Agent: N/A

Full Text:

The proposal in the Rochford Core Strategy for this many houses in the Ward of Hawkwell West is UNSOUND because the vital requirements of PPS12 are not met in terms of sustainability, and therefore, the location of Hawkwell West should be removed by the Inspector and the allocation moved to a sustainable location. In summary the reasons that development in this location is unsustainable under PPS12 are as follows:

TRAVEL

limited public transport
increased car use causing heavy congestion
inability to improve highways
distance from shops
distance from rail stations

ENVIRONMENT

semi rural location unsuitable for large development
complete loss of character
loss of green belt
loss of wildlife
NO social, economic or environmental benefits whatsoever.

In addition the Core Strategy is UNSOUND because it does not fulfil the principles that are expressly stated in the Core Strategy as it relates to the proposal for Hawkwell.

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of the existing settlement in Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

The Core Strategy says 'locate development in areas where alternatives to car use are more viable', 'reduce the requirement to travel', and accompany any development with requisite highway infrastructure to 'mitigate their impact on the existing network'. It is not possible to do this in Hawkwell West as there is no space for development of local roads, especially in Rectory Road, and any development here would increase the requirement to travel, especially by car. Moving on to Public Transport the Core Strategy states that 'planning should be well related to existing public transport where possible'. There is just one bus to and from Southend/Rayleigh per hour with no prospect of Arriva providing an appropriate service in the long term.

Finally, such a large scale development would lead to an unwelcome strip coalescence of built settlements which is not in line with Council policy.

We trust our objections will be noted and our voice will be heard.

Summary:

TRAVEL

limited public transport
increased car use causing heavy congestion
inability to improve highways
distance from shops
distance from rail stations

ENVIRONMENT

semi rural location unsuitable for large development
complete loss of character
loss of green belt
loss of wildlife
NO social, economic or environmental benefits whatsoever.

In addition the Core Strategy is UNSOUND because it does not fulfil the principles that are expressly stated in the Core Strategy as it relates to the proposal for Hawkwell.

Core Strategy Submission Document

O - 15795 - 14070 - Policy H2 - Extensions to residential envelopes and phasing - i

15795 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of the existing settlement in Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

The Core Strategy says 'locate development in areas where alternatives to car use are more viable', 'reduce the requirement to travel', and accompany any development with requisite highway infrastructure to 'mitigate their impact on the existing network'. It is not possible to do this in Hawkwell West as there is no space for development of local roads, especially in Rectory Road, and any development here would increase the requirement to travel, especially by car. Moving on to Public Transport the Core Strategy states that 'planning should be well related to existing public transport where possible'. There is just one bus to and from Southend/Rayleigh per hour with no prospect of Arriva providing an appropriate service in the long term.

Finally, such a large scale development would lead to an unwelcome strip coalescence of built settlements which is not in line with Council policy.

Change to Plan The location of Hawkwell West should be removed by the Inspector and the allocation moved to a sustainable location.

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 15797 - 8435 - Policy H2 - Extensions to residential envelopes and phasing - i, ii, iii

15797 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr Andrew Allen [8435]

36 connaught road,
Rayleigh
ss68ux
uk

Agent: N/A

Full Text: I agree with the need to provide additional housing, and that the Green Belt will have to be used to address this. I do not agree that the locations detailed are the best locations to provide the housing. A more pragmatic approach would be to allow smaller extensions to the residential envelope around each of the settlements, avoiding the need for the huge extensions detailed here. There is inadequate evidence provided to convince me that this has really been considered.

Summary: I agree with the need to provide additional housing, and that the Green Belt will have to be used to address this. I do not agree that the locations detailed are the best locations to provide the housing. A more pragmatic approach would be to allow smaller extensions to the residential envelope around each of the settlements, avoiding the need for the huge extensions detailed here. There is inadequate evidence provided to convince me that this has really been considered.

Change to Plan Provide the evidence supporting the use of huge extensions to the residential envelope rather than smaller extensions around existing settlements to enable proper public scrutiny.

Appear at exam? Yes **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 15798 - 9750 - Policy H2 - Extensions to residential envelopes and phasing - i

15798 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: J R Andrews [9750]

Agent: N/A

Woodview
6 Main Road
Hawkwell
Hockley
Essex
SS5 4JN

Full Text: I strongly object to houses being built in our area.

Objection the Rochford Core Strategy of 175 houses in Hawkwell is unsound.

We need to keep Hawkwell a village. We do not need any more houses, traffic and people. There is only one answer that is NO.

Summary: Objection the Rochford Core Strategy of 175 houses in Hawkwell is unsound.

We need to keep Hawkwell a village. We do not need any more houses, traffic and people. There is only one answer that is NO.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 15803 - 9728 - Policy H2 - Extensions to residential envelopes and phasing - i

15803 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr & Mrs K Brown [9728]

Rectory Cottage
331 Rectory Road
Hawkwell
Essex
SS5 4JX

Agent: N/A

Full Text:

We are writing to object to the Rochford Core Strategy of allowing the construction of 175 houses in the ward of Hawkwell West, we consider that this strategy is unsound because the vital requirements of PPS 12 are not met in terms of sustainability, and that therefore the location of Hawkwell West should be removed by the Inspector and the allocation moved to a sustainable location.

You have invited comments in relation to the planning merits of this core strategy, a strategy that we believe the vast majority of local residents oppose due to the large number of dwellings proposed to be constructed on green belt land with resulting loss of natural wildlife habitat.

My wife was born in Hawkwell in the late 1940's and we have lived in either Hockley or Hawkwell for all of our married life, and for the last 29 years in Rectory Road at the above address.

Throughout all of that time housing developments of one sort or another have taken place within the Parish boundaries: Spencers on the site of the former Spencer Nursery, White Hart Lane, Victor Gardens, Hillside Avenue and at various locations in Main Road Hawkwell eg the site of the former Hawkwell Primary School, Hookers Garage and shops on White Hart Hill demolished with houses being built in their place.

What all of these residential developments have in common is that the number of homes being built were of a size that could be assimilated comfortably within the existing village community and in the main did not detract from the pleasant semi-rural environment of Hawkwell.

The core strategy proposal is for 175 homes to be built on an adjoining parcel of green belt land in Rectory Road thereby creating a huge new housing estate that will be approximately ¼ times larger than any other previous single development in Hawkwell.

The result - should this development be approved - will be the destruction of a natural nature reserve and the loss forever of the pleasant rural environment of Hawkwell which is the main reason that most current residents have chosen to live in the area.

Our specific objections to the proposal are briefly detailed as follows not necessarily in any order or importance:-

Building on existing green belt land.

A 175 home estate is far too large for a relatively small village

Infrastructure of Hawkwell is inadequate to cope with the demands of a development of this size.

175 new houses means at least another 300/400 daily cars on our already congested roads - B1013 is one of the busiest B roads in the country.

Doctors surgeries, Schools and Dentists are full to overflowing and our Fire Service is a retained one not permanently manned.

The proposed site for development is at a considerable distance from shops and railway stations.

The local bus service has been reduced giving few options to travel other than by private car.

Rectory Road from Clements Hall to Nursery Corner is very narrow with buses and lorries having great difficulty in passing.

In the morning rush hour the traffic down Rectory Road to Nursery Corner is already very congested often backing up way past the entrance to the Clements Hall Sports Centre.

The area proposed for development abounds with wildlife: muntjac deer, badgers, foxes and numerous birds currently reside on the land.

Trees and hedging would be lost to be replaced with a concrete jungle.

Living as we do opposite the Christmas Tree Farm we recognize that the charge of 'nimbyism' is likely to be levelled against us and it is obvious that we are one of the families most affected by this proposed development, however we

Core Strategy Submission Document

O - 15803 - 9728 - Policy H2 - Extensions to residential envelopes and phasing - i

15803 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

understand that villages and communities evolve and that part of this process results in increased levels of housing.

Our main objection therefore is the size of the development on green belt land, a development that if permitted will destroy the rural ambience and character of Hawkwell for ever.

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of the existing settlement in Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

Finally we would question the demand eg a number of the flats built at the top of White Hart Hill remain unoccupied some 2 years after completion.

Summary:

Our specific objections to the proposal are briefly detailed as follows not necessarily in any order or importance:-

Building on existing green belt land.

A 175 home estate is far too large for a relatively small village

Infrastructure of Hawkwell is inadequate to cope with the demands of a development of this size.

175 new houses means at least another 300/400 daily cars on our already congested roads - B1013 is one of the busiest B roads in the country.

Doctors surgeries, Schools and Dentists are full to overflowing and our Fire Service is a retained one not permanently manned.

The proposed site for development is at a considerable distance from shops and railway stations.

The local bus service has been reduced giving few options to travel other than by private car.

Rectory Road from Clements Hall to Nursery Corner is very narrow with buses and lorries having great difficulty in passing.

In the morning rush hour the traffic down Rectory Road to Nursery Corner is already very congested often backing up way past the entrance to the Clements Hall Sports Centre.

The area proposed for development abounds with wildlife: muntjac deer, badgers, foxes and numerous birds currently reside on the land.

Trees and hedging would be lost to be replaced with a concrete jungle.

Living as we do opposite the Christmas Tree Farm we recognize that the charge of 'nimbyism' is likely to be levelled against us and it is obvious that we are one of the families most affected by this proposed development, however we understand that villages and communities evolve and that part of this process results in increased levels of housing.

Our main objection therefore is the size of the development on green belt land, a development that if permitted will destroy the rural ambience and character of Hawkwell for ever.

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of the existing settlement in Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

Finally we would question the demand eg a number of the flats built at the top of White Hart Hill remain unoccupied some 2 years after completion.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 15804 - 14073 - Policy H2 - Extensions to residential envelopes and phasing - i

15804 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr C J Marshall [14073]

Agent: N/A

Orchard Lodge
Royer Close
Hawkwell
Essex
SS5 4LR

Full Text:

The planning system exists to ensure that the public interest is taken into account when a new development is proposed, and that new development does not harm the environment. Clearly the proposed development on the land between Main Road and Rectory Road and Clements Hall Hockley fails in the objectives of public interest and environmental impact.

If the council examined the area and current infrastructure, it is clear that:

Transport systems are poor

Traffic congestion through Rectory Road from Main Road and Ashingdon Road is currently a serious issue.

Due to the current housing framework there is no possibility to extend/improve current highways.

It has inadequate Primary and Secondary School facilities

It is inadequately served by shopping facilities.

The distance to train stations is such that links for other transport systems (buses) are essential.

Clements Hall Sports Centre already attracts a high volume of traffic from 7am to 10pm daily.

There are no social benefits of any kind of development for the local community on this green belt land.

The area currently supports a significant wild life population, with examples from Roe deer to common newt, which has been enhanced by the Spencer's Park rural development.

The Proposed Development.

Whether the proposal was 30 or 300 houses the conclusion would be the same. The impact on social and environment levels would be seriously detrimental, and offer no economical benefits to the local economy.

Due to the low level of local industry travel by car is essential due to inadequate Public Transport facilities. Increasing the local population by as little as 30 households would be detrimental, 175 to 350 disastrous. Clearly a development where car use is minimised would be far more in keeping with current government directives.

Additional vehicular access to Rectory Road, and Clements Hall Way would significantly impact on what is already a high throughput road link for traffic moving between Main Road and Ashingdon Road, in addition to the traffic to and from Clements Hall Sports Centre.

There is a requirement for more housing in the district however the intensity of housing in the Hawkwell West area already exceeds current facilities and further development would seriously effect the character and existing education, road and education framework.

The environmental impact of this proposed development should not be underestimated. The stretch of land forms a link between other green belt areas and supports a significant wild life population, including badger, fox, roe deer, and a significant bird and amphibian population.

To the point:

Rochford core strategy for 175 houses this is UNSOUND.

Summary:

If the council examined the area and current infrastructure, it is clear that:

Transport systems are poor

Traffic congestion through Rectory Road from Main Road and Ashingdon Road is currently a serious issue.

Due to the current housing framework there is no possibility to extend/improve current highways.

It has inadequate Primary and Secondary School facilities

It is inadequately served by shopping facilities.

The distance to train stations is such that links for other transport systems (buses) are essential.

Clements Hall Sports Centre already attracts a high volume of traffic from 7am to 10pm daily.

There are no social benefits of any kind of development for the local community on this green belt land.

The area currently supports a significant wild life population, with examples from Roe deer to common newt, which has been enhanced by the Spencer's Park rural development.

The Proposed Development.

Whether the proposal was 30 or 300 houses the conclusion would be the same. The impact on social and environment levels would be seriously detrimental, and offer no economical benefits to the local economy.

Core Strategy Submission Document

15804 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Due to the low level of local industry travel by car is essential due to inadequate Public Transport facilities. Increasing the local population by as little as 30 households would be detrimental, 175 to 350 disastrous. Clearly a development where car use is minimised would be far more in keeping with current government directives.

Additional vehicular access to Rectory Road, and Clements Hall Way would significantly impact on what is already a high throughput road link for traffic moving between Main Road and Ashingdon Road, in addition to the traffic to and from Clements Hall Sports Centre.

There is a requirement for more housing in the district however the intensity of housing in the Hawkwell West area already exceeds current facilities and further development would seriously effect the character and existing education, road and education framework.

The environmental impact of this proposed development should not be underestimated. The stretch of land forms a link between other green belt areas and supports a significant wild life population, including badger, fox, roe deer, and a significant bird and amphibian population.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 15805 - 14074 - Policy H2 - Extensions to residential envelopes and phasing - i

15805 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr and Mrs Osborne [14074]

Agent: N/A

Hethersett
Mount Bovers Lane
Hawkwell
Essex
SS5 4JA
01702 202393

Full Text: Objection to Rochford Core Strategy, 175 houses in Hawkwell is UNSOUND.

The proposal in the Rochford Core Strategy for this many houses in the Hawkwell West Ward is UNSOUND for the following reasons,

Travel - Limited public transport (one bus per hour)
The present road infrastructure (B1013) has difficulty in coping with the heavy congestion each peak time of the day.
There are no shops in the immediate vicinity.
Any building would be quite a distance from the railway stations (where parking is at present at a premium).

Environment - The present semi-rural location is unsuitable for a large development complete loss of character and loss of green belt land.
There would be loss of wildlife and there would be no social, economic or environment benefit to the area whatsoever.

In addition the Core Strategy is UNSOUND because it does not fulfil the principles that are expressly stated in the Core Strategy as it relates to the proposal for Hawkwell.

I trust that you will consider my objections when the planning application comes before the committee.

Summary: The proposal in the Rochford Core Strategy for this many houses in the Hawkwell West Ward is UNSOUND for the following reasons,

Travel - Limited public transport (one bus per hour)
The present road infrastructure (B1013) has difficulty in coping with the heavy congestion each peak time of the day.
There are no shops in the immediate vicinity.
Any building would be quite a distance from the railway stations (where parking is at present at a premium).

Environment - The present semi-rural location is unsuitable for a large development complete loss of character and loss of green belt land.
There would be loss of wildlife and there would be no social, economic or environment benefit to the area whatsoever.

In addition the Core Strategy is UNSOUND because it does not fulfil the principles that are expressly stated in the Core Strategy as it relates to the proposal for Hawkwell.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 15806 - 14075 - Policy H2 - Extensions to residential envelopes and phasing - i

15806 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr B A McCarthy [14075]

Agent: N/A

Potash Cottage
Hall Road
Hawkwell
Essex
SS5 4JW

Full Text: Objection to Rochford Core Strategy 175 houses in Hawkwell.

This letter is to register our objection to the proposed new development in Hawkwell West, as detailed above and we would expect these objections are taken into account prior to any decisions being made. The objections are as detailed below:

The proposed development would increase pressure on the already limited public transport system and the increased car usage would cause additional heavy conjection on local roads. The distance from both shops and rail stations is again totally unacceptable as is the inability to improve highways.

The impact on the environment is also unacceptable with the obvious loss of green belt and wildlife that depends on it. A large development in our semi rural location can only have an adverse affect on our community and would cause a significant downturn in the local character of the area.

Additionally the development would have no social, economic or environmental benefits whatsoever and in that basis the whole idea should be scrapped. I believe that our objections show the proposed development is in direct conflict with the Rochford Core Strategy.

Summary: The proposed development would increase pressure on the already limited public transport system and the increased car usage would cause additional heavy conjection on local roads. The distance from both shops and rail stations is again totally unacceptable as is the inability to improve highways.

The impact on the environment is also unacceptable with the obvious loss of green belt and wildlife that depends on it. A large development in our semi rural location can only have an adverse affect on our community and would cause a significant downturn in the local character of the area.

Additionally the development would have no social, economic or environmental benefits whatsoever and in that basis the whole idea should be scrapped. I believe that our objections show the proposed development is in direct conflict with the Rochford Core Strategy.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 15828 - 8274 - Policy H2 - Extensions to residential envelopes and phasing - i

15828 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr & Mrs Barter [8274]

Agent: N/A

Ross Cottage
58 Hawkwell Chase
Hawkwell
Hockley
Essex
SS5 4NG

Full Text:

I am writing to object to the above proposal as so many new houses in the ward of Hawkwell West is UNSOUND because the vital requirements of PPS 12 are not met in terms of sustainability and therefore the location of Hawkwell West should be removed by the Inspector and the allocation moved to a sustainable location. My reasons are as follows:

We have limited public transport with only one bus an hour between Rayleigh and Southend. There is little or no possibility that this situation will change in the long term. The railway station is not within comfortable walking distance of the planned site. The local shops are not close by. Because of these factors, transport by car will be vital and the existing roads are already over congested and will not be able to sustain the extra volumes of traffic generated by such a large number of new houses.

Hawkwell is a beautiful semi-rural area which will be destroyed by the loss of valuable green belt. The population would be greatly increased almost overnight and the character of this village would be destroyed. There is currently an abundance of varied wild life living on the planned site which would be lost forever. To sum up, there are NO social, economic or environmental benefits whatsoever with regard to this plan.

In addition the Core Strategy is UNSOUND because it does not fulfil the principles expressed therein as follows:

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

The Core Strategy says 'locate development in areas where alternatives to car use are more viable'. As stated above, this is not possible in Hawkwell West. The Core Strategy also states that 'planning should be well related to existing public transport where possible', 'reduce the requirement to travel' and accompany any development with requisite highway infrastructure to 'mitigate their impact on the existing network'. There is no space in Hawkwell West for the development of local roads. As I have already explained above, there is little likelihood that public transport in this area would be improved. Finally, such a large scale development would lead to an unwelcome accumulation of new build houses disproportionate to the area which is not in line with Council policy.

Summary:

We have limited public transport with only one bus an hour between Rayleigh and Southend. There is little or no possibility that this situation will change in the long term. The railway station is not within comfortable walking distance of the planned site. The local shops are not close by. Because of these factors, transport by car will be vital and the existing roads are already over congested and will not be able to sustain the extra volumes of traffic generated by such a large number of new houses.

Hawkwell is a beautiful semi-rural area which will be destroyed by the loss of valuable green belt. The population would be greatly increased almost overnight and the character of this village would be destroyed. There is currently an abundance of varied wild life living on the planned site which would be lost forever. To sum up, there are NO social, economic or environmental benefits whatsoever with regard to this plan.

In addition the Core Strategy is UNSOUND because it does not fulfil the principles expressed therein as follows:

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

The Core Strategy says 'locate development in areas where alternatives to car use are more viable'. As stated above, this is not possible in Hawkwell West. The Core Strategy also states that 'planning should be well related to existing public transport where possible', 'reduce the requirement to travel' and accompany any development with requisite highway infrastructure to 'mitigate their impact on the existing network'. There is no space in Hawkwell West for the development of local roads. As I have already explained above, there is little likelihood that public transport in this area would be improved. Finally, such a large scale development would lead to an unwelcome accumulation of new build houses disproportionate to the area which is not in line with Council policy.

Change to Plan

The location of Hawkwell West should be removed by the Inspector and the allocation moved to a sustainable location

Core Strategy Submission Document

O - 15828 - 8274 - Policy H2 - Extensions to residential envelopes and phasing - i

15828 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 15829 - 11760 - Policy H2 - Extensions to residential envelopes and phasing - i

15829 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr and Mrs Gomm [11760]

Agent: N/A

9 Gregory Close
Hawkwell
Hockley
SS5 4NF

Full Text: 175 new houses in Hawkwell (Rochford Core Strategy)

We are writing to lodge our objections to the above as we believe these proposals to be unsound.

Under the Governments planning policy the terms of sustainability have not been met.

The Councils strategy provides opportunities for environmental, economic and social benefits but there would be no such benefits for Hawkwell under these schemes.

As regards travel, there is no way to mitigate the use of the car as the railway station is not within walking distance for many people. The public bus service is not an alternative and is not customer friendly and unlikely to be much improved in the future.

To summaries:

- 1 - loss of green belt and wildlife
- 2 - no benefits for Hawkwell residents
- 3 - loss of parish character
- 4 - large development not required (Hawkwell already has the most populated area in the district)
- 5 - not possible to improve roads (already heavy congestion)
- 6 - insufficient public transport
- 7 - distance from amenities

Summary:

- 1 - loss of green belt and wildlife
- 2 - no benefits for Hawkwell residents
- 3 - loss of parish character
- 4 - large development not required (Hawkwell already has the most populated area in the district)
- 5 - not possible to improve roads (already heavy congestion)
- 6 - insufficient public transport
- 7 - distance from amenities

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 15832 - 14040 - Policy H2 - Extensions to residential envelopes and phasing - i

15832 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mrs Linda Davie [14040]

37a The Westerings
Hawkwell
Hockley
Essex
SS5 4NY

Agent: N/A

Full Text:

The proposal in the Rochford Core Strategy for this many houses in the Ward of Hawkwell West is unsound because the vital requirements of PPS12 are not met in terms of sustainability, and therefore, the location of Hawkwell West should be removed by the Inspector and the allocation moved to a sustainable location. In summary the reasons that development in this location is unsustainable under PPS12 are as follows:

TRAVEL

limited public transport
increased car use causing heavy congestion
inability to improve highways
distance from shops
distance from rail stations

ENVIRONMENT

semi rural location unsuitable for large development
complete loss of character
loss of green belt
loss of wildlife
NO social, economic or environmental benefits whatsoever.

In addition the Core Strategy is UNSOUND because it does not fulfil the principles that are expressly stated in the Core Strategy as it relates to the proposal for Hawkwell. Please see the following:

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of the existing settlement in Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of the existing settlement in Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

The Core Strategy says 'local development in areas where alternatives to car use are more viable reduce the requirement to travel', and accompany any development with requisite highway infrastructure to 'mitigate their impact on the existing network'. It is not possible to do this in Hawkwell West as there is no space for development of local roads, especially in Rectory Road, and any development here would increase the requirement to travel, especially by car. Moving on to Public Transport the Core Strategy states that 'planning should be well related to existing public transport where possible'. There is just one bus to and from Southend/Rayleigh per hour with no prospect of Arriva providing an appropriate service in the long term.

Finally such a large scale development would lead to an unwelcome strip coalescence of built settlements which is not in line with Council policy.

Summary:

In summary the reasons that development in this location is unsustainable under PPS12 are as follows:

TRAVEL

limited public transport
increased car use causing heavy congestion
inability to improve highways
distance from shops
distance from rail stations

ENVIRONMENT

semi rural location unsuitable for large development
complete loss of character

Core Strategy Submission Document

15832 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

loss of green belt
loss of wildlife
NO social, economic or environmental benefits whatsoever.

In addition the Core Strategy is UNSOUND because it does not fulfil the principles that are expressly stated in the Core Strategy as it relates to the proposal for Hawkwell. Please see the following:

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of the existing settlement in Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of the existing settlement in Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

The Core Strategy says 'local development in areas where alternatives to car use are more viable reduce the requirement to travel', and accompany any development with requisite highway infrastructure to 'mitigate their impact on the existing network'. It is not possible to do this in Hawkwell West as there is no space for development of local roads, especially in Rectory Road, and any development here would increase the requirement to travel, especially by car. Moving on to Public Transport the Core Strategy states that 'planning should be well related to existing public transport where possible'. There is just one bus to and from Southend/Rayleigh per hour with no prospect of Arriva providing an appropriate service in the long term.

Finally such a large scale development would lead to an unwelcome strip coalescence of built settlements which is not in line with Council policy.

Change to Plan The location of Hawkwell West should be removed by the Inspector and the allocation moved to a sustainable location

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 15851 - 14084 - Policy H2 - Extensions to residential envelopes and phasing - i

15851 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr and Mrs Buckingham [14084]

14 Spencers
Hawkwell
Essex
SS5 4LW

Agent: N/A

Full Text:

We are writing to object against the above application for planning permission in Hawkwell. The proposal in the Rochford Core Strategy for this many houses in the ward of Hawkwell West is unsound because the vital requirements of PPS12 are not met in terms of sustainability and therefore should not be under consideration for a housing development and a new SUSTAINABLE site should be sought. Our reasons for objection are as follows:

Traffic issues - A proposal of 150 houses - many households have two cars or more - this at the minimum of 2 cars per household lead to an extra 300+ cars on the road. There is already congestion at peak times at the mini-roundabout junction of Rectory Road and Main Road.

Distance from shops - the main shops at both Hockley and Golden Cross are a half hour walk away - we are encouraged to shop locally and try not to use cars but this development would only mean more use of cars.

Distance from rail stations - again both Hockley and Rochford Station are a distance from proposed development.

There is very limited access to public buses - just one bus per hour to/from Southend/Rayleigh.

The core strategy says 'locate development in areas where alternatives to car use are more viable', 'reduce the requirement to travel', and accompany any development with requisite highway infrastructure to 'mitigate their impact on the existing network'. It is not possible to do this in Hawkwell West as there is no space for development of local roads, especially in Rectory Road and any development would only increase the requirement to travel by road (examples testify to this as per above bullet points).

Environment issues - loss of greenbelt, loss of wildlife habitats, area is characterized by having rural areas - local people appreciate this aspect of living in Hawkwell West - this development gradually erodes the rural element and we end up with a sprawling urban environment which becomes the blight of small parishes across the country. We DO NOT want this to happen in Hawkwell West.

The core strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. We cannot see what such benefits would occur if this development goes ahead. Social benefits? More and more people living on top of one another? Economic benefits? Short-term jobs for builders - a housing development does not generate jobs or income - it is purely a residential dwelling site. Environmental benefits? Destroying existing wildlife habitats and reducing 'green spaces'. People need and enjoy their green and rural spaces. Research has shown the proven psychological health benefits in having access to green spaces and any 'pockets of green space' should be protected accordingly.

Health Services - local primary health care services ie doctors/dentists already running at full capacity - especially with an increasing older population - this development would only add to the pressure of booking in with these services.

Schools - again pressure is put onto local schools with already large class numbers especially if residents with to exercise their right for their children to be allocated a place within their catchment area.

For all of the above reasons, we strongly object to the application for planning permission for a housing development by David Wilson Homes.

Summary:

Our reasons for objection are as follows:

Traffic issues - A proposal of 150 houses - many households have two cars or more - this at the minimum of 2 cars per household lead to an extra 300+ cars on the road. There is already congestion at peak times at the mini-roundabout junction of Rectory Road and Main Road.

Distance from shops - the main shops at both Hockley and Golden Cross are a half hour walk away - we are encouraged to shop locally and try not to use cars but this development would only mean more use of cars.

Distance from rail stations - again both Hockley and Rochford Station are a distance from proposed development.

There is very limited access to public buses - just one bus per hour to/from Southend/Rayleigh.

The core strategy says 'locate development in areas where alternatives to car use are more viable', 'reduce the requirement to travel', and accompany any development with requisite highway infrastructure to 'mitigate their impact on the existing network'. It is not possible to do this in Hawkwell West as there is no space for development of local roads, especially in Rectory Road and any development would only increase the requirement to travel by road (examples testify to this as per above bullet points).

Core Strategy Submission Document

O - 15851 - 14084 - Policy H2 - Extensions to residential envelopes and phasing - i

15851 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Environment issues - loss of greenbelt, loss of wildlife habitats, area is characterized by having rural areas - local people appreciate this aspect of living in Hawkwell West - this development gradually erodes the rural element and we end up with a sprawling urban environment which becomes the blight of small parishes across the country. We DO NOT want this to happen in Hawkwell West.

The core strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. We cannot see what such benefits would occur if this development goes ahead. Social benefits? More and more people living on top of one another? Economic benefits? Short-term jobs for builders - a housing development does not generate jobs or income - it is purely a residential dwelling site. Environmental benefits? Destroying existing wildlife habitats and reducing 'green spaces'. People need and enjoy their green and rural spaces. Research has shown the proven psychological health benefits in having access to green spaces and any 'pockets of green space' should be protected accordingly.

Health Services - local primary health care services ie doctors/dentists already running at full capacity - especially with an increasing older population - this development would only add to the pressure of booking in with these services.

Schools - again pressure is put onto local schools with already large class numbers especially if residents wish to exercise their right for their children to be allocated a place within their catchment area.

Change to Plan A new SUSTAINABLE site should be sought

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 15852 - 8830 - Policy H2 - Extensions to residential envelopes and phasing - i

15852 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mrs Audrey Slemmonds [8830]

18 Victor Gardens
Hawkwell
SS5 4DR
England
01702 200572

Agent: N/A

Full Text:

The proposal in the Rochford Core Strategy (this is the RDC Policy for local development) for this many houses in the Ward of Hawkwell West is UNSOUND because the vital requirements of PPS12 (this is the Government's Planning Policy) are not met in terms of sustainability, and therefore, the location of Hawkwell West (South Hawkwell) should be removed by the Inspector and the allocation moved to a sustainable location. In summary the reasons that development in this location is unsustainable under PPS12 are as follows:

TRAVEL

limited public transport (recently depleted bus service)
increased car use causing heavy congestion. Congestion is already being experienced in area at certain times of the day
improved highways would not be possible
distance from shops
distance from rail stations

ENVIRONMENT

semi rural location unsuitable for large development
complete loss of character
loss of green belt quite unacceptable
loss of wildlife
NO social, economic or environmental benefits whatsoever.

In addition the Core Strategy is UNSOUND because it does not fulfil the principles that are expressly stated in the Core Strategy as it relates to the proposal for Hawkwell. Please see the following:

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of the existing settlement in Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

The Core Strategy says 'locate development in areas where alternatives to car use are more viable', 'reduce the requirement to travel', and accompany any development with requisite highway infrastructure to 'mitigate their impact on the existing network'. It is not possible to do this in Hawkwell West as there is no space for development of local roads, especially in Rectory Road, and any development here would increase the requirement to travel, especially by car. Moving on to Public Transport the Core Strategy states that 'planning should be well related to existing public transport where possible'. There is just one bus to and from Southend/Rayleigh per hour with no prospect of Arriva providing an appropriate service in the long term.

Finally, such a large scale development would lead to an unwelcome strip coalescence of built settlements which is not in line with Council policy.

Summary:

In summary the reasons that development in this location is unsustainable under PPS12 are as follows:

TRAVEL

limited public transport (recently depleted bus service)
increased car use causing heavy congestion. Congestion is already being experienced in area at certain times of the day
improved highways would not be possible
distance from shops
distance from rail stations

ENVIRONMENT

semi rural location unsuitable for large development
complete loss of character
loss of green belt quite unacceptable
loss of wildlife
NO social, economic or environmental benefits whatsoever.

Core Strategy Submission Document

15852 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

In addition the Core Strategy is UNSOUND because it does not fulfil the principles that are expressly stated in the Core Strategy as it relates to the proposal for Hawkwell. Please see the following:

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of the existing settlement in Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

The Core Strategy says 'locate development in areas where alternatives to car use are more viable', 'reduce the requirement to travel', and accompany any development with requisite highway infrastructure to 'mitigate their impact on the existing network'. It is not possible to do this in Hawkwell West as there is no space for development of local roads, especially in Rectory Road, and any development here would increase the requirement to travel, especially by car. Moving on to Public Transport the Core Strategy states that 'planning should be well related to existing public transport where possible'. There is just one bus to and from Southend/Rayleigh per hour with no prospect of Arriva providing an appropriate service in the long term.

Finally, such a large scale development would lead to an unwelcome strip coalescence of built settlements which is not in line with Council policy.

Change to Plan The location of Hawkwell West (South Hawkwell) should be removed by the Inspector and the allocation moved to a sustainable location.

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 15853 - 13609 - Policy H2 - Extensions to residential envelopes and phasing - None

15853 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr and Mrs Daden [13609]

28 White Hart Lane
Hockley
Essex
SS5 4DQ
01702 205147

Agent: N/A

Full Text: Objection to Rochford Core Strategy 175 houses in Hawkwell is UNSOUND.

We strongly object to the building of 175 houses in Hawkwell for the following reasons:

1. There is very limited transport for existing residents already and none for a further 175 houses and their families.
2. We are already at breaking point with congestion on the roads and any increase in car numbers would bring the roads in the area to a stand still.
3. There has been no improvement to our highways for some time.
4. The area designated is some distance away from any shops and impossible on foot.
5. The rail station is also too far to walk to, ...more road congestion. As well as parking nuisance.

The core strategy will ruin the character of the area and would be of no benefit whatsoever to the existing settlement in Hawkwell West. It is already over developed and crowded.

The area is semi rural...we need our green belt. We see the development bringing no social or economic benefit.

Summary: Objection to Rochford Core Strategy 175 houses in Hawkwell is UNSOUND.

We strongly object to the building of 175 houses in Hawkwell for the following reasons:

1. There is very limited transport for existing residents already and none for a further 175 houses and their families.
2. We are already at breaking point with congestion on the roads and any increase in car numbers would bring the roads in the area to a stand still.
3. There has been no improvement to our highways for some time.
4. The area designated is some distance away from any shops and impossible on foot.
5. The rail station is also too far to walk to, ...more road congestion. As well as parking nuisance.

The core strategy will ruin the character of the area and would be of no benefit whatsoever to the existing settlement in Hawkwell West. It is already over developed and crowded.

The area is semi rural...we need our green belt. We see the development bringing no social or economic benefit.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** None

Core Strategy Submission Document

O - 15854 - 14085 - Policy H2 - Extensions to residential envelopes and phasing - i

15854 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr R Port [14085]

23 Tudor Way
Hawkwell
Hockley
Essex
SS5 4EY

Agent: N/A

Full Text: RE: OBJECTION TO ROCHFORD CORE STRATEGY, 175 HOUSES IN HAWKWELL IS UNSOUND

We are writing to strongly oppose the above proposed build and insist that development in this location is unsustainable under PPS12 and list our reasons for this below:

Travel

limited public transport
increased car use causing heavy congestion
inability to improve highways
distance from shops
distance from rail stations.

Environment

semi rural location unsuitable for large development
complete loss of character
loss of green belt
loss of wildlife
no social, economical or environment benefits whatsoever.

Another issue is the high rate of new families that would be moving into the area and the repercussions this may cause to the intake levels available at Schools in the surrounding areas because of the extra influx of children to the area.

Summary: We are writing to strongly oppose the above proposed build and insist that development in this location is unsustainable under PPS12 and list our reasons for this below:

Travel

limited public transport
increased car use causing heavy congestion
inability to improve highways
distance from shops
distance from rail stations.

Environment

semi rural location unsuitable for large development
complete loss of character
loss of green belt
loss of wildlife
no social, economical or environment benefits whatsoever.

Another issue is the high rate of new families that would be moving into the area and the repercussions this may cause to the intake levels available at Schools in the surrounding areas because of the extra influx of children to the area.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 15871 - 7769 - Policy H2 - Extensions to residential envelopes and phasing - i, iii

15871 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr K Sanders [7769]

298 Rectory Road
Hawkwell
Hockley
Essex
SS5 4JZ

Agent: N/A

Full Text: The proposal for 175 additional homes in South Hawkwell clearly indicates a lack of sensible thought by Rochford Council and is totally UNSOUND.

Increased congestion on Rectory Road, which is already impassable during rush hour periods.
No real public transport available in Hawkwell.
Semi rural location totally unsuitable for developments of this size.
No proven need for new homes in Hawkwell.
Loss of green belt.
No social, economic or environmental benefits whatsoever.
Rectory Road already floods during heavy rain, any developments will only exacerbate this problem.
LDF clearly does not conform to government guideline PPS12 for sustainable development.
Use available brown field sites instead.

Summary: The proposal for 175 additional homes in South Hawkwell clearly indicates a lack of sensible thought by Rochford Council and is totally UNSOUND.

Increased congestion on Rectory Road, which is already impassable during rush hour periods.
No real public transport available in Hawkwell.
Semi rural location totally unsuitable for developments of this size.
No proven need for new homes in Hawkwell.
Loss of green belt.
No social, economic or environmental benefits whatsoever.
Rectory Road already floods during heavy rain, any developments will only exacerbate this problem.
LDF clearly does not conform to government guideline PPS12 for sustainable development.
Use available brown field sites instead.

Change to Plan Zero homes to be built in south Hawkwell and the vast amount of brown field sites in Rochford, which will be sustainable and therefore conform to PPS12.

Appear at exam? No **Soundness Tests** i, iii

Core Strategy Submission Document

O - 15883 - 8043 - Policy H2 - Extensions to residential envelopes and phasing - i, iii

15883 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Ms L Wing [8043]

None provided

Agent: N/A

01268 732583

Full Text: The plan is unsound, The farmland should be protected from urban sprawl of West Rayleigh. There will be no natural stopping point until a1245. There are alternate brownfield sites. Plan is meant to protect 'community identity and character'. The building will put unsustainable pressure on Rawreth and rayleighs roads and amenities

Summary: The plan is unsound, The farmland should be protected from urban sprawl of West Rayleigh. There will be no natural stopping point until a1245. There are alternate brownfield sites. Plan is meant to protect 'community identity and character'. The building will put unsustainable pressure on Rawreth and rayleighs roads and amenities

Change to Plan There should be much smaller developments that Rawreth/Rayleigh can sustain

Appear at exam? No

Soundness Tests i, iii

Core Strategy Submission Document

O - 15886 - 14110 - Policy H2 - Extensions to residential envelopes and phasing - i

15886 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr Barrie Stone [14110]

Mr Barrie Stone
Lady Spring Wood
Dunton Road
Billericay
Essex

CM12 9TZ

Agent: Whirledge & Nott (Ms K Jennings) [5094]

Whirledge & Nott
The Black Barn
Lubards Lodge Farm
Hullbridge Road
Rayleigh
Essex

SS6 9QG

Full Text: We object to this policy as it fails to recognise the ability to accommodate significant development South of Rayleigh at Eastwood Nurseries. Land is available in this location which can support housing and the necessary infrastructure including a school. This area is closer to existing urban centres than other sites detailed and has strong links with neighbouring districts where a large proportion of the population commute to for work. Cycle links are already established with employment areas. Green links can be developed with this site and neighbouring Castle Point and Cherry Orchard Jubilee Park open spaces.

Summary: We object to this policy as it fails to recognise the ability to accommodate significant development South of Rayleigh at Eastwood Nurseries. Land is available in this location which can support housing and the necessary infrastructure including a school. This area is closer to existing urban centres than other sites detailed and has strong links with neighbouring districts where a large proportion of the population commute to for work. Cycle links are already established with employment areas. Green links can be developed with this site and neighbouring Castle Point and Cherry Orchard Jubilee Park open spaces.

Change to Plan Allocation of 300 homes South of Rayleigh

Appear at exam? No

Soundness Tests i

Core Strategy Submission Document

O - 15893 - 5018 - Policy H2 - Extensions to residential envelopes and phasing - i, ii, iii

15893 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mrs Linda Parish [5018]

Autumn Place
Ironwell Lane
Hawkwell
Hockley
Essex
SS5 4JY
England
07930 407908

Agent: N/A

Full Text:

The proposal for development in Rectory Road, Hawkwell West (aka Hawkwell South) is unsound due to non-compliance with the District Councils own criteria in 4.19 of section H1 of the Core Strategy. namely,

* proximity & relationship to existing centres, facilities and services - apart from leisure facilities provided by Clements Hall Leisure centre, there are no other local facilities or services available, Main shops too distant to walk to as are the railway stations in Hockley and Rochford. Virtually no bus service (1 bus per hour which is unreliable to time, none in evening)

* availability of infrastructure - the infrastructure is insufficient to support development of the proposed size in this location. There is traffic congestion now causing delays for people both travelling from Hawkwell to Southend or Rayleigh and motorists who use these roads as "through roads" from Southend/Rochford to the A130 to access the A127 and A12. There is a lack of dentists in the area and the schools cannot support more children. Also, all the "local" schools are not within walking distance.

* potential to reduce private car dependency - this is not possible due to the location in relation to the schools, doctors, shops etc. and lack of bus services

*impact on highway network etc - the impact would be horrendous. Queues of traffic exist now during the morning and evening "rush hours" along Rectory Road, Hall Road and Main Road. If the traffic travels easterly along Rectory Road to Ashingdon Road, this is already congested the length of Ashingdon Road, through Rochford to Southend.

A development on this site will not bring social, economical or environmental benefit to the area.

Summary:

this proposed development does not meet 4 of the criteria specified in 4.19 in section H1 ie. proximity to facilities and services - availability of infrastructure - potential to reduce private car dependency - impact on highway network etc. Also, it would not be socially, economically or environmentally beneficial to the area.

Change to Plan

The Inspector should remove this proposed development in Hawkwell East (South) due to being unsound in compliance with the Rochford District Council's own criteria for new developments. The proposed development of this site is unsustainable with the lack of infrastructure to support it. Surely, this is not legally compliant as this proposal does not meet the requirements laid out to sustain this new development.

Appear at exam? No

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 15895 - 14116 - Policy H2 - Extensions to residential envelopes and phasing - i

15895 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr. Alan Farrow [14116]

9 Torquay Close
SS6 9PH
United Kingdom
01268780585

Agent: N/A

Full Text: re- North of London Road, Rayleigh

Unsound, farmland should be saved, because:-
prevents unrestricted sprawl from western Rayleigh
safeguards countryside (once building starts no stopping point until A1245)
other 'Brownfield' sites could be used
plan is supposed to protect 'community identity and character', but this plan doubles population of Rawreth.
building here puts UNSUSTAINABLE pressure on Rayleigh's roads and amenities
in last 25 years about 665 extra dwellings have been built on roads off Rawreth Lane

Summary: re- North of London Road, Rayleigh

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prevents unrestricted sprawl from western Rayleigh
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plan is supposed to protect 'community identity and character', but this plan doubles population of Rawreth.
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in last 25 years about 665 extra dwellings have been built on roads off Rawreth Lane

Change to Plan Farmland should be saved, because:-

this prevents the unrestricted sprawl from western Rayleigh
safeguards countryside (once building starts no stopping point until A1245)
other 'Brownfield' sites could be used
plan is supposed to protect 'community identity and character', but this plan doubles population of Rawreth.
building here puts UNSUSTAINABLE pressure on Rayleigh's roads and amenities

Appear at exam? No

Soundness Tests i

Core Strategy Submission Document

O - 15949 - 7841 - Policy H2 - Extensions to residential envelopes and phasing - i

15949 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr Ian Jordan [7841]

12 Brunswick Place
Rayleigh
SS6 9GB
Essex

Agent: N/A

Full Text: Object to 220 houses on Rawreth Industrial Estate & 550 houses North of London Road Rayleigh.

Building on farmland allows unrestricted urban sprawl of Western Rayleigh with no natural stopping point until the A1245. The plan would not protect the community identity and character of Rawreth, as it would double the population.

Building in this area would put unsustainable pressure on Rayleigh's roads and amenities, the local roads are gridlocked when any minor traffic incidents occur. This part of Rayleigh has had a large number of houses built in the last 20 years.

Summary: Object to 220 houses on Rawreth Industrial Estate & 550 houses North of London Road Rayleigh.

Building on farmland allows unrestricted urban sprawl of Western Rayleigh with no natural stopping point until the A1245. The plan would not protect the community identity and character of Rawreth, as it would double the population.

Building in this area would put unsustainable pressure on Rayleigh's roads and amenities, the local roads are gridlocked when any minor traffic incidents occur. This part of Rayleigh has had a large number of houses built in the last 20 years.

Change to Plan Other brownfield sites could be used spread around the district & protect prime farmland for future use.

Appear at exam? No

Soundness Tests i

Core Strategy Submission Document

S - 15957 - 10849 - Policy H2 - Extensions to residential envelopes and phasing - None

15957 Support

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Canewdon Parish Council (Mrs Kelly Holland)
[10849]
Canewdon Parish Council
33 Rowan Way
Canewdon
Essex
SS4 3PD

Agent: N/A

Full Text: The parish council hopes that there will be a chance to discuss/consult any proposed sites for housing. The one at the top of Chruch Hill, Canewdon, throws up many problems for the church.

Summary: The parish council hopes that there will be a chance to discuss/consult any proposed sites for housing. The one at the top of Chruch Hill, Canewdon, throws up many problems for the church.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 15973 - 13441 - Policy H2 - Extensions to residential envelopes and phasing - None

15973 Support

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: We welcome recognition of the need for a five-year land supply.

Summary: We welcome recognition of the need for a five-year land supply.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16019 - 14146 - Policy H2 - Extensions to residential envelopes and phasing - i, ii, iii

16019 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr H Snell [14146]

Greensleeves
57 High Road
Hockley

SS5 4SZ

Agent: Capita Symonds (Mr David Spencer) [14145]

Capita Symonds
Elizabeth House
Walpole Loke
Dereham
Norfolk
NR19 1EE
England
01362656889

Full Text: Whilst the recognition to release green belt land is supported, the proposals to release significant quantities of development in second and third tier settlements below more sustainable settlements like Hockley are unsound. Furthermore the approach is contrary to the RSS policy framework and the provisions of sustainable locations for housing growth espoused in PPS1 and PPS3. The Council's own evidence and lack of strategic evidence on infrastructure and impact on European Habitats further undermines the effectiveness of Policy H2 as drafted to be the most sustainable option.

Summary: Whilst the recognition to release green belt land is supported, the proposals to release significant quantities of development in second and third tier settlements below more sustainable settlements like Hockley are unsound. Furthermore the approach is contrary to the RSS policy framework and the provisions of sustainable locations for housing growth espoused in PPS1 and PPS3. The Council's own evidence and lack of strategic evidence on infrastructure and impact on European Habitats further undermines the effectiveness of Policy H2 as drafted to be the most sustainable option.

Change to Plan The Council's evidence indicates that the release of land at east Ashingdon, south-west Hullbridge and Great Wakering have higher infrastructure costs. The inclusion of growth at Canewdon (a third tier settlement) is wholly unsustainable. Without access to the final SHLAA and viability assessments it is difficult to comment on the deliverability of these options. All locations have limited public transport and fewer services and facilities compared to Hockley and as such the approach is unsound. Policy H2 should be re-drafted to increase the allocation for Hockley at the expense of less sustainable tier two settlements. As currently drafted the LDF directs 59 % of green belt release housing development to top tier settlements and 41 % to second and third tier settlements. There is scant evidence to support the approach in Policy H2 other than the Council's Sustainability Appraisal Report which says it wants to support the rural communities and that greater growth in the towns will harm their character. The absence of a detailed Infrastructure Study and more critically a Habitats Regulation Assessment (given the proximity of growth locations to the Crouch Estuary SPA) at this late stage of the plan preparation process creates considerable uncertainty that the strategy as presented is deliverable and sufficiently flexible to meet the Vision and objectives. This can be resolved by removing or reducing the allocations from second and third tier settlements and re-directing that growth to sustainable locations such as Hockley. A significant advantage of Hockley is that is less proximate to European Habitats than locations such as Canewdon and Great Wakering.

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16069 - 9614 - Policy H2 - Extensions to residential envelopes and phasing - i, ii

16069 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr David Jefferies [9614]

1 Thorpe Road
Hockley
Hawkwell
SS5 4EP
UK

Agent: N/A

Full Text: The proposal for the Ward of Hawkwell West (South Hawkwell) is UNSOUND because the vital requirements of PPS12 are not met in terms of sustainability, and, therefore, the location should be removed by The Inspector and the allocation moved to a sustainable location.

In summary, this location is unsustainable because of travel (limited public transport, increased car use causing heavy congestion, inability to improve highways, distance from shops and distance from rail stations) and environment (semi-rural location, unsuitable for large development, complete loss of character, loss of green-belt, loss of wildlife and NO social, economic or environmental benefits whatsoever).

Summary: The proposal for the Ward of Hawkwell West (South Hawkwell) is UNSOUND because the vital requirements of PPS12 are not met in terms of sustainability, and, therefore, the location should be removed by The Inspector and the allocation moved to a sustainable location.

In summary, this location is unsustainable because of travel (limited public transport, increased car use causing heavy congestion, inability to improve highways, distance from shops and distance from rail stations) and environment (semi-rural location, unsuitable for large development, complete loss of character, loss of green-belt, loss of wildlife and NO social, economic or environmental benefits whatsoever).

Change to Plan The proposal in the Rochford Core Strategy (the RDC Policy for local development) for this many houses in the Ward of Hawkwell West is UNSOUND because the vital requirements of PPS12 (the Government's Planning Policy) are not met in terms of sustainability, and, therefore, the location of Hawkwell West (South Hawkwell) should be removed by The Inspector and the allocation moved to a sustainable location.

Appear at exam? No

Soundness Tests i, ii

Core Strategy Submission Document

O - 16071 - 9599 - Policy H2 - Extensions to residential envelopes and phasing - i, ii

16071 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mrs Fiona Jury [9599]

WGDP Ltd
Cross Keys House
22 Queen Street
Salisbury
SP1 3EY

Agent: N/A

Full Text: Whilst the principle of extending the residential envelope is supported, the amount of development identified for land to the north of London Road, Rayleigh, in the period 2015 - 2021, particularly when major new infrastructure is needed, is not supported. PPS3 advocates making the best use of existing resources which should be utilised ahead of making new provision. There is capacity at existing primary schools in other areas of Rayleigh i.e. to the south-east, along with suitable housing land, which subject to a Green Belt review, could provide a sustainable urban extension to the town.

Summary: Whilst the principle of extending the residential envelope is supported, the amount of development identified for land to the north of London Road, Rayleigh, in the period 2015 - 2021, particularly when major new infrastructure is needed, is not supported. PPS3 advocates making the best use of existing resources which should be utilised ahead of making new provision. There is capacity at existing primary schools in other areas of Rayleigh i.e. to the south-east, along with suitable housing land, which subject to a Green Belt review, could provide a sustainable urban extension to the town.

Change to Plan The DPD as currently drafted does not meet the test of soundness. The amount of housing proposed for land to the north of London Road, Rayleigh is overly-reliant on infrastructure improvements to support its development, and therefore delivery is questionable. In order to ensure the delivery of the 5 year land supply, and consistency with national policy, it would be preferable to reduce the amount of housing proposed at London Road to 450 dwellings, and identify an alternative location on the edge of Rayleigh to accommodate 100 dwellings. There are opportunities on the south-east edge of the Town which are accessible, that are able to make best use of existing services and facilities.

Appear at exam? Yes

Soundness Tests i, ii

Core Strategy Submission Document

O - 16086 - 14154 - Policy H2 - Extensions to residential envelopes and phasing - i, ii, iii

16086 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: H R Philpot and Sons and Mr [14154]

H R Philpot and Sons and Mr
c/o Bidwells
Number One Legg St
Chelmsford
CM1 1JS

Agent: Bidwells (Mr Sam Metson) [14151]

Bidwells
Number One Legg Street
Chelmsford
Essex
CM1 1JS
01245 250998

Full Text: Policies H2 and H3 should deliver growth by extending existing settlements and Council's overall approach should be encouraged. Fundamentally, the detailed locations and quantum of development should be articulated within the Allocations DPD.

We cannot support the key diagram or the detailed descriptions for the locations of future development contained in policies H2 and H3 as the proposed extensions to residential envelopes pre and post 2021 are too site specific. It is considered that the Core Strategy should identify land at Hullbridge as a growth location and not specifically land South-West of Hullbridge.

Summary: Policies H2 and H3 should deliver growth by extending existing settlements and Council's overall approach should be encouraged. Fundamentally, the detailed locations and quantum of development should be articulated within the Allocations DPD.

We cannot support the key diagram or the detailed descriptions for the locations of future development contained in policies H2 and H3 as the proposed extensions to residential envelopes pre and post 2021 are too site specific. It is considered that the Core Strategy should identify land at Hullbridge as a growth location and not specifically land South-West of Hullbridge.

Change to Plan The Core Strategy should identify Hullbridge as a growth location and not specifically refer to 'land South-West of Hullbridge'. This is too site specific at this stage. It should be for the Site Allocations DPD to allocate land in particular locations based on the broad spatial strategy of the Core Strategy.

Appear at exam? Yes **Soundness Tests** i, ii, iii

Core Strategy Submission Document

S - 16108 - 14107 - Policy H2 - Extensions to residential envelopes and phasing - None

16108 Support

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: We agree, WITH THE EXCEPTION of the following:

It is felt that without additional infrastructure the allocation of number of dwellings proposed for settlement in the Rochford vicinity, it is disproportionately higher, compared to that of other major settlements.

Summary: We agree, WITH THE EXCEPTION of the following:

It is felt that without additional infrastructure the allocation of number of dwellings proposed for settlement in the Rochford vicinity, it is disproportionately higher, compared to that of other major settlements.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16111 - 8688 - Policy H2 - Extensions to residential envelopes and phasing - i

16111 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Hawkwell Action Group (Mr J I Popplewell) [8688] **Agent:** N/A

Hawkwell Action Group
2 Wymans Cottages
Mount Bovers Lane
Hawkwell
Hockley
Essex
SS5 4JB

01702 200123

Full Text: The proposal in the Rochford Core Strategy (this is the RDC Policy for local development) for this many houses in the Ward of Hawkwell West is UNSOUND because the vital requirements of PPS12 (this is the Government's Planning Policy) are not met in terms of sustainability, and, therefore, the location of Hawkwell West (South Hawkwell) should be removed by The Inspector and the allocation moved to a sustainable location. In summary the reasons that development in this location is unsustainable under PPS12 are as follows;

Travel

- limited public transport
- increased car use causing heavy congestion
- inability to improve highways
- distance from shops
- distance from rail stations

Environment

- semi rural location unsuitable for large development
- complete loss of character
- loss of green belt
- loss of wildlife
- NO social, economic or environmental benefits whatsoever

In addition the Core Strategy is UNSOUND because it does not fulfil the principles that are expressly stated in the Core Strategy as it relates to the proposal for Hawkwell. Please see the following;

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of the existing settlement in Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

The Core Strategy says 'locate development in areas where alternatives to car use are more viable', 'reduce the requirement to travel', and accompany any development with requisite highway infrastructure to 'mitigate their impact on the existing network'. It is not possible to do this in Hawkwell West as there is not space for development of local roads, especially in Rectory Road, and any development here would increase the requirement to travel, especially by car. Moving on to Public Transport the Core Strategy states that 'planning should be well related to existing public transport where possible'. There is just one bus to and from Southend/Rayleigh per hour with no prospect of Arriva providing an appropriate service in the long term.

Finally, such a large scale development would lead to an unwelcome strip coalescence of built settlements which is not in line with Council policy.

Summary: The proposal in the Rochford Core Strategy (this is the RDC Policy for local development) for this many houses in the Ward of Hawkwell West is UNSOUND because the vital requirements of PPS12 (this is the Government's Planning Policy) are not met in terms of sustainability, and, therefore, the location of Hawkwell West (South Hawkwell) should be removed by The Inspector and the allocation moved to a sustainable location. In summary the reasons that development in this location is unsustainable under PPS12 are as follows;

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- complete loss of character
- loss of green belt

Core Strategy Submission Document

16111 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

- loss of wildlife
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The Core Strategy says 'locate development in areas where alternatives to car use are more viable', 'reduce the requirement to travel', and accompany any development with requisite highway infrastructure to 'mitigate their impact on the existing network'. It is not possible to do this in Hawkwell West as there is not space for development of local roads, especially in Rectory Road, and any development here would increase the requirement to travel, especially by car. Moving on to Public Transport the Core Strategy states that 'planning should be well related to existing public transport where possible'. There is just one bus to and from Southend/Rayleigh per hour with no prospect of Arriva providing an appropriate service in the long term.

Finally, such a large scale development would lead to an unwelcome strip coalescence of built settlements which is not in line with Council policy.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16115 - 14160 - Policy H2 - Extensions to residential envelopes and phasing - i, iii

16115 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Cllr Chris Black [14160]

56 Love Lane
Rayleigh
Essex
SS67DX

Agent: N/A

Full Text: - the proposal for 550 houses on 'land north of London Road' is UNSOUND.

As stated in paragraph 6.1 , The national "Planning Policy Guidance Note 2 - Green Belts" ("PPG2") states that the five purposes of including land within the Green Belt are as follows:

- â€¢ To check the unrestricted sprawl of large built-up areas;
 - â€¢ To prevent neighbouring towns from merging into one another;
 - â€¢ To assist in safeguarding the countryside from encroachment;
 - â€¢ To preserve the setting and special character of historic towns; and
 - â€¢ To assist in urban regeneration, by encouraging the recycling of derelict and other urban land
- The Green Belt land "north of London Road " is needed for all five purposes:
- â€¢ It prevents the unrestricted sprawl of western Rayleigh
 - â€¢ It provides a barrier to prevent the ultimate merging of Rayleigh , Rawreth and Wickford.
 - â€¢ It safeguards countryside from encroachment by providing a defensible Green Belt boundary
 - â€¢ It enables an attractive setting of the historic centre of Rayleigh to be seen from the west.
 - â€¢ It should indeed be retained, in order to encourage the use of other 'brownfield sites' which are available but excluded from the plan.

So this land should therefore be RETAINED as Green Belt and the plan as proposed is unsound and contrary to national policy. The proposed use of the adjoining Rawreth Industrial estate for 220 homes (policy ED3) provides a suitable number of new dwellings for this location.

Summary: The land "north of London Road " is needed for all five Green Belt purposes:

- â€¢ It prevents the unrestricted sprawl of western Rayleigh
- â€¢ It provides a barrier to prevent the ultimate merging of Rayleigh , Rawreth and Wickford.
- â€¢ It safeguards countryside from encroachment by providing a defensible Green Belt boundary
- â€¢ It enables an attractive setting of the historic centre of Rayleigh to be seen from the west.
- â€¢ It should indeed be retained, in order to encourage the use of other 'brownfield sites' which are available but excluded from the plan.

Change to Plan The 'land north of London Road should be removed from the proposals and several smaller brownfield sites should be used instead.

Appear at exam? Yes **Soundness Tests** i, iii

Core Strategy Submission Document

O - 16137 - 10079 - Policy H2 - Extensions to residential envelopes and phasing - i

16137 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mrs E Graham [10079]
C/O Agent - Mr G Pyle

Agent: Mr G W Pyle [8549]
Wood Farm
Bulby
Near Bourne
Lincolnshire
PE10 0RU
08456 444 747

Full Text: We believe it to be unsound; the chosen green belt in the north of Rayleigh is not the best location for hundreds of homes. The impact of housing within the green belt could be reduced if more suitable small green belt sites are included. There is a suitable site to the south of Rayleigh adjoining the residential area of Weir Farm Road, Hollytree gardens, Kingswood Crescent and Western Road, where a number of homes could be built. No coalescence with a neighbouring community would exist and it could provide positive community benefits including a primary school as in CLT2.

Summary: We believe it to be unsound; the chosen green belt in the north of Rayleigh is not the best location for hundreds of homes. The impact of housing within the green belt could be reduced if more suitable small green belt sites are included. There is a suitable site to the south of Rayleigh adjoining the residential area of Weir Farm Road, Hollytree gardens, Kingswood Crescent and Western Road, where a number of homes could be built. No coalescence with a neighbouring community would exist and it could provide positive community benefits including a primary school as in CLT2.

Change to Plan To lessen the impact of hundreds of homes in a single green belt location such as the north of Rayleigh the release of small well located green belt sites like to the south of Rayleigh adjoining the residential area of Weir Farm Road, Hollytree gardens, Kingswood Crescent and Western Road will be considered. A limited number of homes here is possible plus no coalescence with a neighbouring community exists; it could also provide positive community benefits such as a primary school as specified in CLT2.

Appear at exam? Yes

Soundness Tests i

Core Strategy Submission Document

O - 16150 - 9823 - Policy H2 - Extensions to residential envelopes and phasing - i

16150 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: mr alistir matthews [9823]

Agent: N/A

telfords farm
chelmsford road
battlesbridge
wickford
SS118TR
uk
01268732069

Full Text: Much of the land "north of london road" is within the parish of Rawreth which is shown as tier 4 in the settlement hierachy on page 33 but is assumed to be an extension of the settlement of Rayleigh .This is untruthfull and therefore onsound .

Summary: Much of the land "north of london road" is within the parish of Rawreth which is shown as tier 4 in the settlement hierachy on page 33 but is assumed to be an extension of the settlement of Rayleigh .This is untruthfull and therefore onsound .

Change to Plan It should be stated that either the land is within Rawreth or that Rawreth is indeed to be included in tier 3

Appear at exam? No

Soundness Tests i

Core Strategy Submission Document

O - 16163 - 12947 - Policy H2 - Extensions to residential envelopes and phasing - ii, iii

16163 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: West Rochford Action Group (Mrs Alison Henwood) [12947]

West Rochford Action Group
16 St Andrews Road,
Rochford,
Essex
SS4 1NP
England
01702531513

Agent: N/A

Full Text:

This submission is made on behalf of the West Rochford Action Group and its members. Further details sent under separate cover: email and by hand.

H2 Extensions to residential envelopes and phasing.

1. Loss of Green Belt

West Rochford has been identified as bearing the largest extension to the current residential envelope with the proposed loss of greenbelt land to accommodate a total of 600 homes by 2021. This cannot be said to be a balanced strategy (para 4.18) when considering the population statistics (para 2.21) which places the settlement tier of Rochford/Ashingdon 3rd in terms of size behind Rayleigh and Hawkwell/Hockley.

The proposal to reallocate Green Belt land for housing on such a large scale (more than 50% of the housing proposed to be on land currently Green Belt) cannot be viewed as having a minimal impact. The Town and Country Planning (Green Belt) Directive 2005 final regulatory impact statement when considering the size of development that would be potentially harmful to the green belt and should require referral to the Secretary of State states (para 21) that a site which roughly equates to ten new, average-size dwellings broadly represents the scale of development around which there is the potential for significant impact on the openness of the Green Belt.

PPG2 provides the Governments policy on Green Belts and the intentions of the policy are set out in para 1.4:-

The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the most important attribute of Green Belts is their openness. Green Belts can shape patterns of urban development at sub-regional and regional scale, and help to ensure that development occurs in locations allocated in development plans. They help to protect the countryside, be it in agricultural, forestry or other use.

The purpose of including land in Green Belts is set out at 1.5 :-

- * to check the unrestricted sprawl of large built-up areas;
- * to prevent neighbouring towns from merging into one another;
- * to assist in safeguarding the countryside from encroachment;
- * to preserve the setting and special character of historic towns; and
- * to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

PPG2 para1.6 states:-

Once Green Belts have been defined, the use of land in them has a positive role to play in fulfilling the following objectives:

- to provide opportunities for access to the open countryside for the urban population;
- to provide opportunities for outdoor sport and outdoor recreation near urban areas;
- to retain attractive landscapes, and enhance landscapes, near to where people live;
- to improve damaged and derelict land around towns;
- to secure nature conservation interest; and
- to retain land in agricultural, forestry and related uses.

The proposals in the Core Strategy in relation to Green Belt land do not comply with these objectives and will lead to urban sprawl particularly in the area of West Rochford.

Although not site specific the Key Diagram attached to the Core Strategy shows a triangle of land immediately west of Oak Road as proposed for development and further research has demonstrated this to be the case.

This area has a particular character which will clearly be lost if large scale development is permitted. PPG2 states at para 2.6 that once the general extent of a Green Belt has been approved it should be altered only in exceptional circumstances. If such an alteration is proposed the Secretary of State will wish to be satisfied that the authority has considered opportunities for development within the urban areas contained by and beyond the Green Belt. Similarly, detailed Green Belt boundaries defined in adopted local plans or earlier approved development plans should be altered only exceptionally. Detailed boundaries should not be altered or development allowed merely because the land has become derelict.

Core Strategy Submission Document

O - 16163 - 12947 - Policy H2 - Extensions to residential envelopes and phasing - ii, iii

16163 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

A need for such a large number of homes has not been demonstrated and in April 2001 there were 761 empty dwellings in Rochford and the trend has shown an increase in vacant dwellings as by April 2006 there were 996 empty homes which indicates that demand has plateaued. Furthermore two developments designed and built especially for the elderly in Rochford prior to the economic problems still have units unsold.

2. Agricultural Land

In so far as any development proposals include agricultural land the need has to be observed of the future requirements of feeding the country in view of the serious concerns for world food shortages and the estimated large increase in the population of the world and particularly this country. It will not be environmentally acceptable to pursue a policy of importing food which could be grown in this country. Sent under separate cover (email), is an article from the business edition of the Daily Telegraph dated 13th October 2009 and stressed in that article is the second paragraph which refers to the shortage of quality farmland as the global population expands. The agricultural land on the north side of Hall Road is top quality (Grade one) and is a prime example of land which will be needed in the future.

3. Social Housing

The Housing Waiting list statistics shown at para 2.38 of the consultation document shows 44.4% of the demand for social housing to be located in Rayleigh against 29% for Rochford. There is therefore a greater need for social housing in Rayleigh and the Core Strategy does not indicate that a greater proportion of social housing will be provided in Rayleigh. Furthermore no statistics have been provided in respect of the Housing Waiting List so it is unclear as to the exact extent of the need for social housing in the district

PPG2 para 3.2 states:-

Inappropriate development is, by definition, harmful to the Green Belt. It is for the applicant to show why permission should be granted. Very special circumstances to justify inappropriate development will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. In view of the presumption against inappropriate development, the Secretary of State will attach substantial weight to the harm to the Green Belt when considering any planning application or appeal concerning such development.

3.4 The construction of new buildings inside a Green Belt is inappropriate unless it is for the following purposes:

- agriculture and forestry (unless permitted development rights have been withdrawn);
- essential facilities for outdoor sport and outdoor recreation, for cemeteries, and for other uses of land which preserve the openness of the Green Belt and which do not conflict with the purposes of including land in it;
- limited extension, alteration or replacement of existing dwellings;
- limited infilling in existing villages, and limited affordable housing for local community needs under development plan policies according with PPG3,
- limited infilling or redevelopment of major existing developed sites identified in adopted local plans, which meets the criteria in paragraph C3 or C4 of Annex C1.

As land proposed to be developed is in the Green Belt these policies should apply to the proposals for reallocation.

4. Roads and Transport

Traffic congestion in Hall Road and on the outskirts of Rochford town is a frequent occurrence particularly at peak times. Additional development in west Rochford on the scale proposed will force additional traffic on to both Hall Road and Cherry Orchard Way and thence on to the A127 or via Warners Bridge towards Southend Town Centre - both routes are regularly congested. The junction improvements proposed will not solve the issue because it was acknowledged in the East of England Plan paras 4.57 and 4.58 that in the morning peak period traffic flows on the A127 already exceed capacity in the westbound direction which is expected to become worse by 2031. It is also acknowledged that traffic flows already exceed capacity on several sections of the A13 and are forecast to increase further. There is currently no bus service serving Hall Road or Cherry Orchard Way. It was also acknowledged in the Core Strategy document that 84% of households have cars.

If the employment proposals north of Aviation Way which have been included as part of the airport expansion and development scheme proceed the traffic impact would be even worse. Furthermore the pedestrian access under the bridge at Rochford station already poses dangers to pedestrians particularly for those in wheelchairs and prams with no potential for access improvements. The increased traffic flow generated by development proposals will exacerbate the dangers.

Emergency services must be able to gain access to incidents and a significant further increase in traffic flows that will result from these proposals will jeopardise their effective operation.

A full transport assessment is required to ensure the provisions of PPG13 para 23 can be met before reallocating green belt land and ensure achievement of the key planning objective set out in para 19 of PPG13 to ensure that developments are accessible by public transport walking and cycling to promote social inclusion particularly for those who do not have regular use of a car. The emphasis in the Core Strategy on social housing provision makes this requirement particularly important. Para 40 of PPG13 requires that this same policy should be applied in rural areas where public transport is less available.

5. Water supply

Para 4.70 of the East of England Plan showed a deficit of -50 -20 mega litres per day and further acknowledges that unless the supply of water and related infrastructure is improved it will be a barrier to development from 2015. Any

Core Strategy Submission Document

O - 16163 - 12947 - Policy H2 - Extensions to residential envelopes and phasing - ii, iii

16163 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

reallocation of sites should therefore be contingent upon the necessary infrastructure provision being secured. There are serious doubts as to whether this development can responsibly be pursued.

See supporting document, Council ref AE28

Summary: Unsustainable and inconsistent with the requirements of PPG2 and PPG13. Not environmentally acceptable in terms of the agricultural land that will be lost.

See supporting document, Council ref AE28

Change to Plan Review need and amend policy to ensure viability and compliance with PPGs.

Appear at exam? Yes **Soundness Tests** ii, iii

Core Strategy Submission Document

O - 16168 - 14185 - Policy H2 - Extensions to residential envelopes and phasing - ii

16168 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: The JTS Partnership on behalf of John Bishop
[14185]

The JTS Partnership on behalf of John Bishop
Number One, The Drive
Great Warley
Brentwood
Essex
CM13 3DJ
United Kingdom

Agent: Mr Sean Marten [9337]

The JTS Partnership LLP
Number One, The Drive
Great Warley
Brentwood
Essex
CM13 3DJ
United Kingdom
01277 224664

Full Text: Policy H2 - Extensions to residential envelopes and phasing and Appendix H1

We acknowledge that this policy for the Core Strategy appropriately sets out the broad areas for extensions to residential envelopes and phasing. However it does not clearly identify the release of green field land and does not identify specific areas, although it is implied that this would involve redefining the Green Belt Boundary.

The identification to extend the existing settlement of Hockley is wholly supported. However the justification for the proposal to extend the envelope and phasing for only West Hockley is unclear. There is no objection to the principle of extending West Hockley; however the LDF should ensure that land allocations are evenly spread both throughout the plan period and throughout Hockley.

Summary: Observations and suggestions relating to the identification to extend the existing settlement of Hockley.

Change to Plan It is felt that areas in North Hockley should also be considered for expansion which would make a valuable contribution to the existing community, and with suitable accessibility and connection with public transport.

Accordingly the policy should be amended to omit "West" from West Hockley and also in Appendix H1. On the key diagram the symbol identifying extensions to residential development should be non-site specific and relate clearly to the settlement as a whole in order not to prejudge actual land release.

Appear at exam? No

Soundness Tests ii

Core Strategy Submission Document

S - 16183 - 5322 - Policy H2 - Extensions to residential envelopes and phasing - None

16183 Support

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Pond Chase Nurseries Ltd [5322]

Pond Chase Nurseries Ltd
Folly Lane
Hockley
Essex
SS5 4SR

Agent: Boyer Planning Ltd (Mr R Ricks) [8313]

Boyer Planning Ltd
49 North Hill
Colchester
Essex
CO1 1PY
01206 769018

Full Text: We support the proposed extensions to residential envelopes.

The Council intend to maintain a flexible approach on phasing of housing. We would suggest the policy would be made more sound if the indicative housing provision for each settlement were regarded as a approximate figure and that the final housing provision be established through the Allocations development plan document.

For consistency with other policies, including the Regional Spatial Strategy where the housing provision is identified as a minimum figure, Policy H2 should expressly state that the housing provision for each settlement represents the minimum housing provision.

Summary: We support the proposed extensions to residential envelopes.

The Council intend to maintain a flexible approach on phasing of housing. We would suggest the policy would be made more sound if the indicative housing provision for each settlement were regarded as a approximate figure and that the final housing provision be established through the Allocations development plan document.

For consistency with other policies, including the Regional Spatial Strategy where the housing provision is identified as a minimum figure, Policy H2 should expressly state that the housing provision for each settlement represents the minimum housing provision.

Change to Plan N/A

Appear at exam? Not Specified

Soundness Tests N/A

Core Strategy Submission Document

O - 16188 - 14099 - Policy H2 - Extensions to residential envelopes and phasing - i, ii

16188 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr Wayne Lottering [14099]

85 Downhall Park Way
Rayleigh
SS6 9QZ
Essex
01268 781112

Agent: N/A

Full Text: Object to 220 houses on Rawreth Industrial Estate & 550 houses North of London Road Rayleigh.

This part of Rayleigh has been extensively developed over the last 1-15 years with the character of the area now changed dramatically. The area is now one big housing development and the roads are now very busy.

Since the development and construction of the additional houses on the old Reads Nursery site, traffic in Downhall Park Way (especially from the junction with Rawreth Lane to Sweyne Park) is very busy and dangerous with cars parked all along the road and near junctions.

Additional traffic along Rawreth Lane will create further delays when using this area.

Any new housing should be developed in other parts of Rochford as Rayleigh has now been overdeveloped.

Summary: Object due to overdevelopment of Rayleigh.

Change to Plan Housing to be built in other parts of Rochford.

Appear at exam? No **Soundness Tests** i, ii

Core Strategy Submission Document

O - 16196 - 9917 - Policy H2 - Extensions to residential envelopes and phasing - i, iii

16196 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Inner London Group [9917]

Inner London Group
P.O. Box 91
Benfleet,
Essex
SS7 2FF

Agent: Christopher Wickham Associates (Mr C Wickham)
[4961]

Christopher Wickham Associates
35 High Street
Highgate
London
N6 5JT

Full Text: The proposed releases of land for development at Hullbridge and Canewdon are considered to be unsustainable and therefore unsound. New housing should be directed to those areas with a close and more sustainable relationship with Southend including the second tier settlement of Great Wakering which is wrongly omitted as a location for expansion prior to 2021. Development to the south-west of Great Wakering would successfully relate to the Star Lane Industrial Estate which is earmarked under Policy H1 for residential use.

Summary: The proposed releases of land for development at Hullbridge and Canewdon are considered to be unsustainable and therefore unsound. New housing should be directed to those areas with a close and more sustainable relationship with Southend including the second tier settlement of Great Wakering which is wrongly omitted as a location for expansion prior to 2021. Development to the south-west of Great Wakering would successfully relate to the Star Lane Industrial Estate which is earmarked under Policy H1 for residential use.

Change to Plan Policy H2 should be amended to exclude South West Hullbridge and South Canewdon. This dwelling provision should be redistributed between first tier settlements and Great Wakering, specifically (in relation to the latter) land to the south-west of Great Wakering. This approach will be sound because it will accord with the principles of sustainable development as set out in national planning policy and the RSS.

Appear at exam? No

Soundness Tests i, iii

Core Strategy Submission Document

O - 16199 - 9891 - Policy H2 - Extensions to residential envelopes and phasing - i, iii

16199 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Stolkin and Clements (Southend) LLP [9891]

Stolkin and Clements (Southend) LLP
Hawkley House
28 Chapel Street
Billericay
CM12 9LU

Agent: Firstplan (Ms K Matthews) [8501]

Firstplan
25 Floral Street
London
WC2E 9DS
020 7031 8210

Full Text:

In our view, the Core Strategy is unsound because draft Policy H2 is neither justified nor consistent with National Policy.

Whilst our clients, Stolkin and Clements (Southend) LLP, agree that it is sound to designate green belt land for residential development; the areas designated in Policies H2 and H3 are not the most appropriate areas and land at Tithe Park, should be designated within Policy H2/H3 for c. 390 dwellings.

We have previously submitted a masterplan for Tithe Park during the preferred options consultation and this masterplan is provided again for information.

Consistency with National Policy

Policy H2 is unsound because it is not consistent with the following National Policy:-

PPS1 provides the overarching Government planning advice for the delivery of sustainable development through the planning system.

Paragraph 13 sets out the key principles:

(i) "Development plans should ensure that sustainable development is pursued in an integrated manner, in line with the principles for sustainable development set out in the UK strategy. Regional planning bodies and local planning authorities should ensure that development plans promote outcomes in which environmental, economic and social objectives are achieved together over time.

(ii) Regional planning bodies and local planning authorities should ensure that development plans contribute to global sustainability by addressing the causes and potential impacts of climate change - through policies which reduce energy use, reduce emissions (for example, by encouraging patterns of development which reduce the need to travel by private car, or reduce the impact of moving freight), promote the development of renewable energy resources, and take climate change impacts into account in the location and design of development."

Paragraph 16 of PPS1 confirms that development plans should address accessibility (both in terms of location and physical access) for all members of the community to jobs, health, housing, education, shops, leisure and community facilities. Paragraph 27 (v) reiterates this, stating that, in preparing development plan documents, planning authorities should seek to ensure that everyone can access services or facilities on foot, bicycle or public transport rather than having to rely on access by car, whilst recognising that this may be more difficult in rural areas.

Paragraph 20 confirms that development plan policies should take into account the protection of the wider countryside and the impact of the proposed development on landscape quality.

PPS3 sets out the national planning policy framework for delivering the Government's housing objectives. Paragraph 36 states that the Government's policy is to ensure that housing is developed in suitable locations which offer a range of community facilities and with good access to jobs, key services and infrastructure.

PPG13 sets out the Government's planning guidance on transport planning. Paragraph 4 sets out the following objectives:-

1. promote more sustainable transport choices for both people and for moving freight;
2. promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling, and
3. reduce the need to travel, especially by car.

In summary the Core Strategy is not consistent with the following two objectives of national policy:

- Minimising the need to travel
- Protecting the wider countryside and landscape quality

Minimising the need to travel

Core Strategy Submission Document

16199 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

The Core Strategy Submission Document recognises that a high proportion of the Rochford workforce commutes out of the District, with 30% travelling to work in Southend (Paragraph 2.53).

It states that:-

"the strength of the spheres of influence of the large neighbouring centres of Southend, Basildon and Chelmsford means that traffic is drawn through Rochford District's own centres to them. This not only has an impact on traffic congestion in general, but also engenders concern with regards to air quality within the District's town centres." (Paragraph 2.62)

Paragraph 6.5 of the Core Strategy states that the Council recognises that diverting development and population growth away from rural areas to existing urban areas can assist in achieving sustainability objectives.

Draft Policy H2 proposes various extensions to existing settlements. However, these extensions will inevitably lead to increased car use from a greater number of commuters.

A more sustainable option is to provide a residential extension to Southend on the Tithe Park site.

As detailed in the 'Tithe Park' masterplan (August 2008), the site is within 10 minutes walk of the shopping and associated amenities of the Asda superstore, the local shops situated on the Broadway, Southend, and individual local shops within Shoeburyness. It is within 10 minutes walk of a number of primary and secondary schools. Furthermore, the site is within comfortable cycling distance of Shoeburyness Railway Station with direct links to London Fenchurch Street as well as local stops within Southend including Southend Central Railway Station from where the town centre amenities can easily be accessed. There are also bus stops situated to the south of the site along Eagle Way.

Tithe Park is therefore better connected than some of the other locations set out in Policy H2, for example, South West Hullbridge and South Canewdon, which is not within comfortable cycling distance of a railway station. It will also have no harmful impact on the traffic congestion within Rochford Borough which, some of the other locations suggested in the Core Strategy will as they are likely to be home to commuters to Southend who will travel to Southend everyday by motor car.

Protecting the wider countryside and landscape quality

Draft Policy H2 proposes several extensions to existing settlements. Whilst, the Core Strategy does not allocate specific sites, it is important that the locations set out in Core Strategy Policy H2/ H3 are able to provide sites which are well related to their settlement and do not impact on the surrounding landscape.

Tithe Park abuts the urban area of Southend to the south and west and therefore will have an acceptable impact in terms of the overall openness of the countryside.

Justification

Draft Policy H2 is not sufficiently justified because it is not the most appropriate strategy when considered against reasonable alternatives, as required by paragraphs 4.36 - 4.38 of PPS12 (Justification of Core Strategies). In particular, the proposed location of housing, as an extension to the Southend urban area, is a more sustainable option and therefore a more appropriate strategy.

The Strategic Housing Land Availability Statement (SHLAA) had not been published at the time of the submission version consultation, only a summary table had been produced. It is therefore impossible to understand how Draft Policy H2 is underpinned by this key part of the evidence base.

However, having considered the other documents in the evidence base, including the Strategic Environmental Assessment Baseline Information Profile 2008 - 2009, it is clear that Tithe Park should be considered sequentially preferable to the areas identified in Draft Policy H2. For example:-

- There are a number of local wildlife sites located to the west of Hockley;
- There are areas of Ancient Woodland situated to the west of Hockley;
- West Great Wakering and South Canewdon is situated within the Crouch and Roach Farmland Landscape Area which has a higher landscape sensitivity than the Tithe Park site which is located within the South Essex Coastal Towns Landscape Area; and
- Depending on the sites chosen, there is a possibility that land south west of Hullbridge and east of Ashington will be in Flood Risk Zone 2 or 3

Given these findings it is clear that the proposed sites are not based on a robust and credible evidence base.

Summary:

The Core Strategy is unsound because draft Policy H2 is neither justified nor consistent with National Policy.

The areas designated in Policy H2 are not the most appropriate areas and land at Tithe Park, should be designated within Policy H2/H3 for c. 390 dwellings.

Additional evidence supplied, Council ref AE26

Core Strategy Submission Document

O - 16199 - 9891 - Policy H2 - Extensions to residential envelopes and phasing - i, iii

16199 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Change to Plan Policy H2 to be amended to include our client's site as an 'Area' in the table. The area could be know as 'land to the south of Poynters Lane, adjoining the urban area of Southend'

Appear at exam? Yes

Soundness Tests i, iii

Core Strategy Submission Document

S - 16208 - 8650 - Policy H2 - Extensions to residential envelopes and phasing - None

16208 Support

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Countryside Properties (Southern) Ltd (Mr Steve Price) [8650] **Agent:** N/A

Countryside Properties (Southern) Ltd
Countryside House
The Drive
Brentwood
Essex
CM13 3AT
01277260000

Full Text: Support

We support the identification of land North of London Road, Rayleigh as one of the allocated growth areas/urban extensions in this policy.

We agree that development should be comprehensively planned, and support the principle of providing a range of other uses and infrastructure to serve any urban extension west of Rayleigh. However, such infrastructure must be reasonably associated with the impacts of the development. The scale and nature of such infrastructure that we could provide will be dependant upon the scale and nature of development accepted on the option land (see further representations below).

Summary: Support

We support the identification of land North of London Road, Rayleigh as one of the allocated growth areas/urban extensions in this policy.

We agree that development should be comprehensively planned, and support the principle of providing a range of other uses and infrastructure to serve any urban extension west of Rayleigh. However, such infrastructure must be reasonably associated with the impacts of the development. The scale and nature of such infrastructure that we could provide will be dependant upon the scale and nature of development accepted on the option land (see further representations below).

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16209 - 8650 - Policy H2 - Extensions to residential envelopes and phasing - None

16209 Support

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Countryside Properties (Southern) Ltd (Mr Steve Price) [8650] **Agent:** N/A

Countryside Properties (Southern) Ltd
Countryside House
The Drive
Brentwood
Essex
CM13 3AT
01277260000

Full Text: General amendments sought

Whilst we appreciate that the Core Strategy is not the vehicle to identify the precise boundaries of these residential growth/development areas, we do however consider that the key diagram is too vague and there should be a clearer identification of growth areas. It is not possible to ascertain the extent/location of likely development areas (not just North of London Road) and therefore their relationship to existing residents/road network etc. Therefore it is difficult to know what impact any such development will have on surrounding residents/the road network etc. The Core Strategy can be fairly specific in identifying sites, even if precise boundaries are not defined.

No appropriate density ranges are given within the Core Strategy, so again it is difficult to ascertain the likely land area required to achieve the number of units required/specified.

We believe that appropriate density ranges should be specified (a separate policy). Our considerable experience of urban extensions indicate that typical density ranges are from 35 to 45 dwellings per hectare for a whole site, where these schemes also include large percentages of affordable housing.

Summary: Clarification sought regarding the boundaries of the allocation for North of London Road, Rayleigh, and regarding density parameters.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16212 - 8650 - Policy H2 - Extensions to residential envelopes and phasing - ii, iii

16212 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Countryside Properties (Southern) Ltd (Mr Steve Price) [8650] **Agent:** N/A

Countryside Properties (Southern) Ltd
Countryside House
The Drive
Brentwood
Essex
CM13 3AT
01277260000

Full Text: Unsound: (i) not consistent with national policy (ii) not effective (not deliverable/not flexible) (iii) not justified

(1) We consider it unsound as drafted, on the grounds that it fails to be consistent with policy set out in the East of England Plan. Policy H1 of the RSS expresses housing requirements as minimum levels to be achieved and directs planning authorities to similarly express requirements as minimal. To provide certainty that the RSS housing targets will be met (although see representations below), the housing numbers specified in this policy should be expressed as minimums.

(2) We consider that in addition to the need to state that dwelling numbers are minimums, wording should also be added which states that "the actual amount of development will be determined by environmental and infrastructure capacity considerations, and the detailed consideration of master plans for each site", and that "there may be a possible requirement for greater housing numbers on some sites should other sources of housing, such as that on identified appropriate brownfield sites, not come forward as anticipated". We believe this to be a sensible and flexible approach. This will allow for appropriate flexibility in the plan.

(3) We argue that one or more of the greenfield sites identified for 2015 onwards should be brought forward in this policy, to ensure national/regional targets or annual targets are met. Whilst we recognize that the council "will maintain a flexible approach with regards to the timing of the release of land for residential development to ensure a five year supply" (bottom of Policy H2), we consider that there is enough evidence at this time to bring forward one or more of the Greenfield sites now.

Rather than repeat arguments put forward in our representations to Policy H1, we refer you to them in regard to our belief that required (RSS) 5 year housing targets will not be achieved because of an over reliance upon brownfield sites that we believe will not be delivered in the timescales anticipated by the council.

(4) Bearing in mind our representations regarding housing delivery rates and the over reliance placed upon and constraints associated with the development of identified brownfield sites (see policy H1 reps), we argue that as well as bringing forward one or more of the Greenfield sites identified in Policy H2 as 2015-2021, the number of units for one or more of the Greenfield sites be increased to make up for what we consider will be a shortfall in the delivery of housing on brownfield sites. We particularly recommend that because of the significant delivery constraints to the proposed redevelopment of the Rawreth Lane Industrial Estate, further housing units be identified for the land we promote, north of London Road, Rayleigh, as a replacement for the number of units identified for this industrial estate.

Again, rather than repeat arguments put forward in our representations to Policy H1 (see also Policy ED3 reps), we refer you to them in regard to our belief that required (RSS) housing targets will not be able to be achieved for the plan period because of an over reliance upon brownfield sites that we believe will either not be delivered in the timescales anticipated by the council, or may not come forward at all in the plan period.

(5) We refer to the infrastructure requirements for each site set out in Appendix H1, and referred to in this policy.

It should be made explicit that the level of infrastructure to be provided with a development will be reasonably related to the impact of that development. Circular 5/05 and the emerging/published DCLG guidance on the use of CIL, makes it clear that new developments/contributions from new development can not be used to resolve existing deficiencies (only, proportionally, those deficiencies made worse by new development).

Whilst some infrastructure requirements will be required to adhere to other council policies, it should be made clear that the majority of infrastructure requirements for each development site listed in Appendix H1 will be specified in future master plans/planning permissions when the precise impacts of the development are understood and assessed. It would be inappropriate to specify infrastructure requirements at this time when the precise scale and nature of development is not determined.

With regard to (2) to (4) above, we believe that the site we promote, with the addition of land under other ownership north of London Road (west of Rayleigh), can

- A) Be delivered (in part) prior to 2015
- B) Accommodate more than the identified 550 units

Core Strategy Submission Document

O - 16212 - 8650 - Policy H2 - Extensions to residential envelopes and phasing - ii, iii

16212 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

A) In terms of the land which we promote, there are no on or off-site hindrances to delivery that we are aware of in terms of infrastructure requirements e.g. no highway or service infrastructure constraints. The land we promote is in single ownership (to which we have an option), so there are no land assembly issues. Whilst other land ownerships north of London road could be included within the development of this area e.g. council owned sport pitch area, we are confident that there will not be any significant delay in bringing forward such land as part of a comprehensive development scheme for the area.

The site was in fact identified as being required by 2015 in the Preferred Options version of the Core Strategy, and we have received no justification from the council as to why it is now identified as being required for the period of 2015-2021.

We believe that development of our site could commence as soon as the site has a defined/adopted development allocation and boundary, and planning permission is granted. We are happy to discuss with the council the appropriate timing of submission of any planning application and how this would affect the timing of commencement of development/delivery of units. We are happy to fast track a planning application if the council consider this appropriate and would be required this to meet housing targets/needs.

We had set out a possible delivery timetable for the site we promote in our representations to the SHLAA consultation in April 2009. We suggested that for us to achieve the provision of 450 units (or a range of 400 to 500 units) by 2015 for example, planning permission would need to be granted by, at latest, early to mid 2012 (so an application submitted prior to the end of 2011). With time then required to achieve the submission and sign off of any pre-commencement requirements, and to account for a lead in time prior to commencement of infrastructure works, it is likely that development could then commence by early 2013 (first occupations prior to the end of that year).

We would currently envisage a build rate of between 200 to 250 housing units a year. This is of course dependant upon a number of factors, particularly regarding affordable housing delivery, such as the level of affordable housing grant available and location of such housing/pepper potting.

B) We believe that the land we have under option, on its own or with land north of London Road in other ownerships, can provide for more than 550 units.

In fact, 650 units were identified in the Preferred Options version of the Core Strategy. We have not been informed by the council (there is no explanation in the Core strategy) why the number identified for this area has been reduced. There is no reasoning/justification within the Core Strategy as to why the figure of 550 units has been chosen.

We consider the key factor in limiting the number of units is the issue of defining where the appropriate revised green belt boundary should be set for the western edge of any development west of Rayleigh. We consider that there are a number of possible options for the green belt boundary, but a boundary could easily be drawn to enable enough land to be developed for a greater number of units, without further detriment to the landscape and character of the area, or without causing any coalescence with properties in Rawreth Village.

We are able, on the land under our option, to provide for a significant strategic gap or buffer between any new development and Rawreth village and the A1245. Significant green infrastructure could be incorporated into this space, and/or the land remain, in part, in agricultural use if considered appropriate. The nature and use of the strategic gap and location of open space will be determined through a master plan for the site.

We will work with the council to bring forward the strategic growth of land north of London Road as early as possible/appropriate to help ensure that the RSS targets are being met.

We consider that of the Greenfield sites identified in the plan, land north of London Road Rayleigh (land under our control) should accommodate greater numbers of dwellings.

The reasons for this is that Rayleigh, by far, is the most sustainable location for growth in Rochford, and land to the west of Rayleigh, north of London Road, the most appropriate, accessible and sustainable location for an urban extension to Rayleigh (as evidenced by its choice as the only urban extension to Rayleigh in the Core Strategy). Other possible sites considered for Rayleigh have serious policy, environmental or access/capacity constraints to delivery.

Rayleigh has the greatest variety and widest base of retail and other services of any settlement in Rochford. It also benefits from being the most accessible in terms of strategic highway links and capacity (particularly the western side of Rayleigh), and has the largest population and town centre. It has the highest housing waiting list demand and therefore probably the highest demand for affordable housing. With a new employment "park" also being identified for west of Rayleigh, a greater variety of job offers should also be available.

We are surprised that planned housing growth however, as set out in both policies H2 and H3, distribute numbers fairly evenly over first and second tier settlements, even though Rayleigh is clearly the largest and most sustainable town/location for development.

Combined (total) green belt allocations, set out in policies H2 & H3 lead to:

Tier 1

Core Strategy Submission Document

O - 16212 - 8650 - Policy H2 - Extensions to residential envelopes and phasing - ii, iii

16212 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Rayleigh 550 units (2001 population 30,196)
Rochford/Ashingdon 1200 units (combined population 10,775)
Hockley/Hawkwell 225 units (combined population 20,140)

Tier 2
Hullbridge 500 units (pop 6,445)
Great Wakering 250 units (pop 5,512)

When you take into account that some of the larger identified brownfield development sites in Rayleigh are not likely to come forward in the plan period, particularly Rawreth Industrial Estate (220 units), there appears to be very little growth in Rayleigh when considered against other less sustainable towns/locations in Rochford. Whilst Rayleigh has experienced more growth in previous years than other towns, this is not a reason alone to direct larger development quantum to other, less sustainable locations.

Therefore, for the above reasons, we believe that the Core Strategy be amended to identify a larger allocation of dwelling numbers for land North of London Road, Rayleigh.

Summary:

1. the housing numbers specified in this policy should be expressed as minimums.
2. A change of wording is suggested to ensure flexibility
3. one or more of the greenfield sites identified for 2015 onwards should be brought forward in this policy
4. the number of units for one or more of the Greenfield sites be increased to make up for what we consider will be a shortfall in the delivery of housing on brownfield sites.
5. the level of infrastructure to be provided with a development will be reasonably related to the impact of that development.

Change to Plan

Changes necessary to make Policy H2 sound

Whilst we consider that these matters are of sufficient importance to question the soundness of the Plan as drafted, we do not consider that it goes to the heart of the plan. We consider that minor changes proposed by the EiP Inspector, or made by the Borough Council in response to our representations, can be made as part of the Examination process, to make the plan sound.

1. We would propose that the housing requirements for each strategic growth site be expressed as a minimum in accordance with the RSS for the East of England.
2. We put forward the following additional words for Policy H2: "the actual amount of development will be determined by environmental and infrastructure capacity considerations, and the detailed consideration of master plans for each site" and that "there may be a possible requirement for greater housing numbers on some sites should other sources of housing, such as that on identified appropriate brownfield sites, not come forward as anticipated".
3. Land North of London Road, Rayleigh, should be brought forward from "Dwellings 2015 to 2021" to the "Dwellings by 2015" period.
4. The council provides justification as to why only 550 units have been identified for North of London Road, Rayleigh (as opposed to the 650 units identified in the Preferred Options or a higher number), and why Rayleigh has a relatively small growth allocation compared to other less sustainable towns. After further consideration by the council of the deliverability of identified brownfield sites (in the SHLAA) in Rayleigh (and Rochford as a whole), particularly with regard to the proposed redevelopment of the larger existing employment sites such as the Rawreth Lane Industrial Estate, the numbers allocated for Rayleigh (North of London Road), be increased. Please see also our representations regarding the deliverability of the Rawreth Lane Industrial Estate in Policies H1 and ED3.
5. It should be made explicit that the level of infrastructure to be provided with a development will be reasonably related to the impact of that development and that infrastructure requirements for each site listed in Appendix H1 will be specified in future master plans/planning permissions when the precise impacts of the development are understood and assessed.

Appear at exam? Yes

Soundness Tests ii, iii

Core Strategy Submission Document

O - 16348 - 8267 - Policy H2 - Extensions to residential envelopes and phasing - ii

16348 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Aber Ltd [8267]

Aber Ltd
C/o Agent

Agent: Colliers CRE (Mr S Chapman) [8266]

Colliers CRE
9 Marylebone Lane
London
W1U 1HL
020 7344 6533

Full Text:

We agree with the general locations and phasing of residential properties over the plan period, however, in light of the current economic conditions and the need to maintain an adequate five year supply; the policy needs to adopt a flexible approach with regards the timing and release of land for residential development.

In order to ensure flexibility, this policy needs to make reference to Policy H3, in case the locations allocated under Policy H2 do not come forward in the required timeframe or deliver the required number of dwellings.

Fourth Paragraph - amend as follows:

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. If the locations within Policy H2 do not come forward in the required timeframe or deliver the required number of dwellings, then locations with Policy H3 should be brought forward to address this shortfall.

Summary:

We agree with the general locations and phasing of residential properties over the plan period, however, in light of the current economic conditions and the need to maintain an adequate five year supply; the policy needs to adopt a flexible approach with regards the timing and release of land for residential development.

In order to ensure flexibility, this policy needs to make reference to Policy H3, in case the locations allocated under Policy H2 do not come forward in the required timeframe or deliver the required number of dwellings.

Change to Plan

Fourth Paragraph - amend as follows:

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. If the locations within Policy H2 do not come forward in the required timeframe or deliver the required number of dwellings, then locations with Policy H3 should be brought forward to address this shortfall.

Appear at exam? No

Soundness Tests ii

Core Strategy Submission Document

O - 16395 - 14208 - Policy H2 - Extensions to residential envelopes and phasing - i

16395 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr and Mrs Gritton [14208]

Agent: N/A

6a Read Close
Hawkwell
Hockley
Essex
SS5 4LS

Full Text:

The proposal in the Rochford Core Strategy for this many houses in the Ward of Hawkwell West is UNSOUND because the vital requirements of PPS12 are not met in terms of sustainability, and, therefore, the location of Hawkwell West (South Hawkwell) should be removed by The Inspector and the allocation moved to a sustainable location. In summary the reasons that development in this location is unsustainable under PPS12 are as follows:

Travel

- limited public transport
- increased car use causing heavy congestion
- inability to improve highways
- distance from shops
- distance from rail stations

Environment

- semi rural location unsuitable for large development
- complete loss of character
- loss of green belt
- loss of wildlife
- NO social, economic or environmental benefits whatsoever

In addition the Core Strategy is UNSOUND because it does not fulfil the principles that are expressly stated in the Core Strategy as it relates to the proposal for Hawkwell.

For all the aforementioned reasons, we have come to the conclusion that we must strongly object to Rochford District Council's plans to allow 175 new houses to be built in Hawkwell.

Summary:

The proposal in the Rochford Core Strategy for this many houses in the Ward of Hawkwell West is UNSOUND because the vital requirements of PPS12 are not met in terms of sustainability, and, therefore, the location of Hawkwell West (South Hawkwell) should be removed by The Inspector and the allocation moved to a sustainable location. In summary the reasons that development in this location is unsustainable under PPS12 are as follows:

Travel

- limited public transport
- increased car use causing heavy congestion
- inability to improve highways
- distance from shops
- distance from rail stations

Environment

- semi rural location unsuitable for large development
- complete loss of character
- loss of green belt
- loss of wildlife
- NO social, economic or environmental benefits whatsoever

In addition the Core Strategy is UNSOUND because it does not fulfil the principles that are expressly stated in the Core Strategy as it relates to the proposal for Hawkwell.

For all the aforementioned reasons, we have come to the conclusion that we must strongly object to Rochford District Council's plans to allow 175 new houses to be built in Hawkwell.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

16396 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr T Rees BA(Hons) Hum (Open), DipLit (Open),
PGCE [9171]
32 Spencers
Hawkwell
Essex
SS5 4LW

Agent: N/A

Full Text: Objection to Rochford Core Strategy 175 new houses in Hawkwell is UNSOUND.

Further to my previous Emails, your letter dated 14th September and an E-invitation from Kay Tinson, I wish to register, once again, my objections to the proposed development as captioned above.

The Rochford Core Strategy (RCS) proposal for the Ward of Hawkwell West is unsound because the location cannot sustain this many houses under the terms of the Government's Planning Policy PPS12.

The RCS is intended to protect the character of existing settlements and specifically '...seeks to take advantage of development opportunities that will provide social, economic and environmental benefits...'

However, it is difficult to see where any such benefits would arise from this settlement, whereas its detrimental effect on the character of Hawkwell is patently obvious.

The RCS states that '...there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected..' and yet this proposed development screams out as an example of plugging a green gap to complete yet another strip coalescence of built settlements in Hawkwell - using an unsustainable number of dwellings.

The Christmas Tree farm is part and parcel of Hawkwell West and is also a mini eco-system in itself. Building up this area would destroy another green area of Hawkwell with the resultant loss of character and wildlife, for the sake of an unsustainable and unbeneficial development.

The RCS intends to:

'..reduce the requirement to travel...'
have planning '...well related to existing public transport where possible...'
'..locate development in areas where alternatives to car use are more viable...' and
'...mitigate the impact on the existing network...'

However, the proposed development doesn't tick any of these boxes.

The requirement to travel, whether from 175 or 330 houses, will occur and remain because the site is near neither the shops, nor the railway station, nor any local amenities - with the exception of the leisure centre, which usually has a busy car park!

The planning for this site clearly doesn't relate to existing public transport since it is not within reasonable walking distance of Hockley or Rochford railway stations and Hawkwell is served by but one bus per hour, from Rayleigh and Southend h no immediate prospect for change).

Given the above, new residents will use their cars out of necessity and this will add to the horrendous congestion problem that already exists on the B1013 Main Road in Hawkwell and Rectory Road. Such has been the increase in volume of traffic using the B1013 over the last few years - at all times of the day; not only during the rush hour and not only during the week - that it is becoming a question of if rather than when you can cross the road (on foot) or join the main highway from a side road (by car). I encounter both problems on a daily basis and I know that any additional traffic would inevitably exacerbate this problem.

Furthermore, there is no prospect of mitigating the impact of additional traffic because there is no room to develop the highway infrastructure on either of the aforementioned roads (B1013 and Rectory Road) which surround the proposed development.

In short, there is a piece of land in Hawkwell which could accommodate a number of new houses...but even the most basic research shows that in terms of location, environment, character and infrastrucutre, any development of that site would be unsustainable.

Therefore I suggest that the proposed development is UNSOUND.

Summary: The Rochford Core Strategy (RCS) proposal for the Ward of Hawkwell West is unsound because the location cannot sustain this many houses under the terms of the Government's Planning Policy PPS12.

In short, there is a piece of land in Hawkwell which could accommodate a number of new houses...but even the most

Core Strategy Submission Document

O - 16396 - 9171 - Policy H2 - Extensions to residential envelopes and phasing - iii

16396 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

basic research shows that in terms of location, environment, character and infrastructure, any development of that site would be unsustainable.

Therefore I suggest that the proposed development is UNSOUND.

Change to Plan

Appear at exam? Not Specified

Soundness Tests iii

Core Strategy Submission Document

O - 16397 - 9790 - Policy H2 - Extensions to residential envelopes and phasing - i

16397 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: A Wilkinson [9790]

274 Rectory Road
Hawkwell
Hockley
Essex
SS5 4JZ

Agent: N/A

Full Text: Objection to Rochford Core Strategy 175 houses in Hawkwell is UNSOUND

I object to the above on the grounds of:

Limited public transport
Increased car use causing heavy congestion
Inability to improve highways
Distance from shops
Distance from rail stations

Summary: Objection to Rochford Core Strategy 175 houses in Hawkwell is UNSOUND

I object to the above on the grounds of:

Limited public transport
Increased car use causing heavy congestion
Inability to improve highways
Distance from shops
Distance from rail stations

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

16398 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr and Mrs Payne [9916]

397 Rectory Road
Hawkwell
Essex
SS5 4JX

Agent: N/A

Full Text: Reference: Objection to Rochford Core Strategy, 175 houses in Hawkwell is UNSOUND.

Further to our recent correspondence on this subject in September and to your letter dated 21 September 2009, concerning the Core Strategy Pre-Submission Consultation, my wife and I wish to re-affirm that the proposal in the Rochford Core Strategy, for this many houses in the ward of Hawkwell West is UNSOUND, because the vital requirements of PPS12, are not met in terms of sustainability and therefore, the location of Hawkwell West (South Hawkwell), should be removed by the inspector and the allocation moved to a sustainable location. In summary the reasons that development in this location is unsustainable under PPS12 are as follows:

Travel:

The public transport system in the Rectory Road area is totally inadequate, with buses to Rayleigh or Southend on an hourly schedule, in spite of repeated appeals to the bus company to considerably improve all services around this area, there is little response.

As nearly all of the schools, shops and railway stations are a considerable walking distance from the village, this means that the car is the regular means of transport to all of these places, which at certain times of the day already causes heavy congestion at the main junctions in Rectory Road. The proposal to build such a large number of houses in the middle of Hawkwell village, would increase the number of vehicle movements by possibly another 1500 per day, which would bring Rectory Road to a complete standstill as there is no real possibility to widen or improve the other highways in the area. The increase in air pollution on people living along this road would be totally unacceptable.

Environment:

Our village of Hawkwell is in a semi rural location, which is unsuitable for a large development such as this. The proposal for a housing estate in the middle of the village, would be totally out of character within a lovely green belt area that has sustained the village for hundreds of years in different forms. The proposed area is a haven for all kinds of wildlife and to concrete over this area would be irresponsible and would surely cause untold flooding in the area, with only a small brook to accommodate the water which would naturally be absorbed in the woodland areas. Clearly there are no social, economic or environmental benefits whatsoever, to be gained by such a development in this area of natural beauty.

In addition the Core Strategy is UNSOUND because it does not fulfil the principles that are expressly stated in the Core Strategy as it relates to the proposal for Hawkwell. Please see the following:

The Core Strategy talks about protecting the character of the existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of the existing settlement in Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

The Core Strategy says 'locate development in areas where alternatives to car use are more viable', 'reduce the requirements to travel' and accompany any development with requisite highway infrastructure to 'mitigate their impact on the existing network'. It is not possible to do this in Hawkwell West as there is no space for development of local roads, especially in Rectory Road and any development here would increase the requirement to travel, especially by car. Moving on to public transport the Core Strategy states that 'planning should be well related to existing public transport where possible'. There is just one bus to and from Southend/Rayleigh per hour with no prospect of Arriva providing an appropriate service in the long term.

Finally, such a large scale development would lead to an unwelcome strip coalescence of built settlements which is not in line with Council policy.

In consideration of the aforementioned points, we trust that the council will reject any future development in the village of Hawkwell.

Summary: Reference: Objection to Rochford Core Strategy, 175 houses in Hawkwell is UNSOUND.

My wife and I wish to re-affirm that the proposal in the Rochford Core Strategy, for this many houses in the ward of Hawkwell West is UNSOUND, because the vital requirements of PPS12, are not met in terms of sustainability. In summary the reasons that development in this location is unsustainable under PPS12 are as follows:

Travel:

Core Strategy Submission Document

16398 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

The public transport system in the Rectory Road area is totally inadequate, with buses to Rayleigh or Southend on an hourly schedule, in spite of repeated appeals to the bus company to considerably improve all services around this area, there is little response.

As nearly all of the schools, shops and railway stations are a considerable walking distance from the village, this means that the car is the regular means of transport to all of these places, which at certain times of the day already causes heavy congestion at the main junctions in Rectory Road. The proposal to build such a large number of houses in the middle of Hawkwell village, would increase the number of vehicle movements by possibly another 1500 per day, which would bring Rectory Road to a complete standstill as there is no real possibility to widen or improve the other highways in the area. The increase in air pollution on people living along this road would be totally unacceptable.

Environment:

Our village of Hawkwell is in a semi rural location, which is unsuitable for a large development such as this. The proposal for a housing estate in the middle of the village, would be totally out of character within a lovely green belt area that has sustained the village for hundreds of years in different forms. The proposed area is a haven for all kinds of wildlife and to concrete over this area would be irresponsible and would surely cause untold flooding in the area, with only a small brook to accommodate the water which would naturally be absorbed in the woodland areas. Clearly there are no social, economic or environmental benefits whatsoever, to be gained by such a development in this area of natural beauty.

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The Core Strategy says 'locate development in areas where alternatives to car use are more viable', 'reduce the requirements to travel' and accompany any development with requisite highway infrastructure to 'mitigate their impact on the existing network'. It is not possible to do this in Hawkwell West as there is no space for development of local roads, especially in Rectory Road and any development here would increase the requirement to travel, especially by car. Moving on to public transport the Core Strategy states that 'planning should be well related to existing public transport where possible'. There is just one bus to and from Southend/Rayleigh per hour with no prospect of Arriva providing an appropriate service in the long term.

Finally, such a large scale development would lead to an unwelcome strip coalescence of built settlements which is not in line with Council policy.

In consideration of the aforementioned points, we trust that the council will reject any future development in the village of Hawkwell.

Change to Plan The location of Hawkwell West (South Hawkwell), should be removed by the inspector and the allocation moved to a sustainable location.

Appear at exam? Not Specified **Soundness Tests** iii

Core Strategy Submission Document

16400 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mrs K Weller [9585]

1 Claybrick Avenue
Hockley
Essex
SS5 4PS

Agent: N/A

Full Text: Objection to Rochford Core Strategy, 175 houses in Hawkwell is UNSOUND.

I am writing to object to the above proposal as so many new houses in the ward of Hawkwell West is UNSOUND because the vital requirements of PPS12 are not met in terms of sustainability and therefore the location of Hawkwell West should be removed by the Inspection and the allocation moved to a sustainable location. My reasons are as follows:

We have limited public transport with only one bus an hour between Rayleigh and Southend. There is little or no possibility that this situation will change in the long term. The railway station is not within comfortable walking distance of the planned site. The local shops are not close by. Because of these factors, transport by car will be vital and the existing roads are already over congested and will not be able to sustain the extra volumes of traffic generated by such a large number of new houses.

Hawkwell is a beautiful semi-rural area which will be destroyed by the loss of valuable green belt. The population would be greatly increased almost overnight and the character of this village would be destroyed. There is currently an abundance of varied wild life living on the planned site which would be lost forever. To sum up, there are NO social, economic or environmental benefits whatsoever with regard to this plan.

In addition the Core Strategy is UNSOUND because it does not fulfil the principles expressed therein as follows:

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

The Core Strategy says 'locate development in areas where alternatives to car use are more viable'. As stated above, this is not possible in Hawkwell West. The Core Strategy also states that 'planning should be well related to existing public transport where possible', 'reduce the requirement to travel' and accompany any development with requisite highway infrastructure to 'mitigate their impact on the existing network'. There is no space in Hawkwell West for the development of local roads. As I have already explained above, there is little likelihood that public transport in this area would be improved. Finally, such a large scale development would lead to an unwelcome accumulation of new build houses disproportionate to the area which is not in line with Council policy.

Summary: Objection to Rochford Core Strategy, 175 houses in Hawkwell is UNSOUND.

I am writing to object to the above proposal as so many new houses in the ward of Hawkwell West is UNSOUND because the vital requirements of PPS12 are not met in terms of sustainability. My reasons are as follows:

We have limited public transport with only one bus an hour between Rayleigh and Southend. There is little or no possibility that this situation will change in the long term. The railway station is not within comfortable walking distance of the planned site. The local shops are not close by. Because of these factors, transport by car will be vital and the existing roads are already over congested and will not be able to sustain the extra volumes of traffic generated by such a large number of new houses.

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The Core Strategy says 'locate development in areas where alternatives to car use are more viable'. As stated above, this is not possible in Hawkwell West. The Core Strategy also states that 'planning should be well related to existing public transport where possible', 'reduce the requirement to travel' and accompany any development with requisite highway infrastructure to 'mitigate their impact on the existing network'. There is no space in Hawkwell West for the

Core Strategy Submission Document

O - 16400 - 9585 - Policy H2 - Extensions to residential envelopes and phasing - iii

16400 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

development of local roads. As I have already explained above, there is little likelihood that public transport in this area would be improved. Finally, such a large scale development would lead to an unwelcome accumulation of new build houses disproportionate to the area which is not in line with Council policy.

Change to Plan The location of Hawkwell West should be removed by the Inspection and the allocation moved to a sustainable location

Appear at exam? Not Specified **Soundness Tests** iii

Core Strategy Submission Document

16401 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr & Mrs Jones [8276]

18 Hawkwell Chase
Hawkwell
Hockley
Essex
SS5 4NH

Agent: N/A

Full Text: Objection to Rochford Core Strategy, 175 houses in Hawkwell is UNSOUND.

I am writing to object to the above proposal as so many new houses in the ward of Hawkwell West is UNSOUND because the vital requirements of PPS12 are not met in terms of sustainability and therefore the location of Hawkwell West should be removed by the Inspection and the allocation moved to a sustainable location. My reasons are as follows:

We have limited public transport with only one bus an hour between Rayleigh and Southend. There is little or no possibility that this situation will change in the long term. The railway station is not within comfortable walking distance of the planned site. The local shops are not close by. Because of these factors, transport by car will be vital and the existing roads are already over congested and will not be able to sustain the extra volumes of traffic generated by such a large number of new houses.

Hawkwell is a beautiful semi-rural area which will be destroyed by the loss of valuable green belt. The population would be greatly increased almost overnight and the character of this village would be destroyed. There is currently an abundance of varied wild life living on the planned site which would be lost forever. To sum up, there are NO social, economic or environmental benefits whatsoever with regard to this plan.

In addition the Core Strategy is UNSOUND because it does not fulfil the principles expressed therein as follows:

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

The Core Strategy says 'locate development in areas where alternatives to car use are more viable'. As stated above, this is not possible in Hawkwell West. The Core Strategy also states that 'planning should be well related to existing public transport where possible', 'reduce the requirement to travel' and accompany any development with requisite highway infrastructure to 'mitigate their impact on the existing network'. There is no space in Hawkwell West for the development of local roads. As I have already explained above, there is little likelihood that public transport in this area would be improved. Finally, such a large scale development would lead to an unwelcome accumulation of new build houses disproportionate to the area which is not in line with Council policy.

Summary: Objection to Rochford Core Strategy, 175 houses in Hawkwell is UNSOUND.

I am writing to object to the above proposal as so many new houses in the ward of Hawkwell West is UNSOUND because the vital requirements of PPS12 are not met in terms of sustainability. My reasons are as follows:

We have limited public transport with only one bus an hour between Rayleigh and Southend. There is little or no possibility that this situation will change in the long term. The railway station is not within comfortable walking distance of the planned site. The local shops are not close by. Because of these factors, transport by car will be vital and the existing roads are already over congested and will not be able to sustain the extra volumes of traffic generated by such a large number of new houses.

Hawkwell is a beautiful semi-rural area which will be destroyed by the loss of valuable green belt. The population would be greatly increased almost overnight and the character of this village would be destroyed. There is currently an abundance of varied wild life living on the planned site which would be lost forever. To sum up, there are NO social, economic or environmental benefits whatsoever with regard to this plan.

In addition the Core Strategy is UNSOUND because it does not fulfil the principles expressed therein as follows:

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

The Core Strategy says 'locate development in areas where alternatives to car use are more viable'. As stated above, this is not possible in Hawkwell West. The Core Strategy also states that 'planning should be well related to existing public transport where possible', 'reduce the requirement to travel' and accompany any development with requisite

Core Strategy Submission Document

O - 16401 - 8276 - Policy H2 - Extensions to residential envelopes and phasing - iii

16401 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

highway infrastructure to 'mitigate their impact on the existing network'. There is no space in Hawkwell West for the development of local roads. As I have already explained above, there is little likelihood that public transport in this area would be improved. Finally, such a large scale development would lead to an unwelcome accumulation of new build houses disproportionate to the area which is not in line with Council policy.

Change to Plan The location of Hawkwell West should be removed by the Inspection and the allocation moved to a sustainable location

Appear at exam? Not Specified **Soundness Tests** iii

Core Strategy Submission Document

O - 16402 - 14209 - Policy H2 - Extensions to residential envelopes and phasing - iii

16402 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mrs Cocks [14209]

81 Victor Gardens
Hawkwell
Hockley
Essex
SS5 4DY

Agent: N/A

Full Text:

2. Objection to Planning Application of 330 houses by David Wilson Homes.

Summary:

Objection to Rochford Core Strategy of 175 houses in Hawkwell is unsound because the vital requirements of PPS12 are not met in terms of sustainability. It is unsustainable under the PPS12 as follows:

TRAVEL - we have very limited public transport and even buses are often cut out for no reason
increase of cars
inability to improve highways
distance from shops and railway

ENVIRONMENT - semi rural location unsuitable for large development
loss of character
loss of green belt (green belt was protected by past governments and even if it is only 1% now what about the percentages taken in future. Green belt is sacrosanct!
loss of wildlife
NO social, economic or environmental benefits whatsoever.

Change to Plan The location of Hawkwell West/East should be removed by the Inspector

Appear at exam? Not Specified

Soundness Tests iii

Core Strategy Submission Document

O - 16403 - 8275 - Policy H2 - Extensions to residential envelopes and phasing - iii

16403 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr & Mrs I Cooper [8275]

56 Hawkwell Chase
Hawkwell
Hockley
Essex
SS5 4NG
01702 206393

Agent: N/A

Full Text: Objection to Rochford Core Strategy, 175 houses in Hawkwell is UNSOUND.

I am writing to object to the above proposal as so many new houses in the ward of Hawkwell West is UNSOUND because the vital requirements of PPS12 are not met in terms of sustainability and therefore the location of Hawkwell West should be removed by the Inspection and the allocation moved to a sustainable location. My reasons are as follows:

We have limited public transport with only one bus an hour between Rayleigh and Southend. There is little or no possibility that this situation will change in the long term. The railway station is not within comfortable walking distance of the planned site. The local shops are not close by. Because of these factors, transport by car will be vital and the existing roads are already over congested and will not be able to sustain the extra volumes of traffic generated by such a large number of new houses.

Hawkwell is a beautiful semi-rural area which will be destroyed by the loss of valuable green belt. The population would be greatly increased almost overnight and the character of this village would be destroyed. There is currently an abundance of varied wild life living on the planned site which would be lost forever. To sum up, there are NO social, economic or environmental benefits whatsoever with regard to this plan.

In addition the Core Strategy is UNSOUND because it does not fulfil the principles expressed therein as follows:

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

The Core Strategy says 'locate development in areas where alternatives to car use are more viable'. As stated above, this is not possible in Hawkwell West. The Core Strategy also states that 'planning should be well related to existing public transport where possible', 'reduce the requirement to travel' and accompany any development with requisite highway infrastructure to 'mitigate their impact on the existing network'. There is no space in Hawkwell West for the development of local roads. As I have already explained above, there is little likelihood that public transport in this area would be improved. Finally, such a large scale development would lead to an unwelcome accumulation of new build houses disproportionate to the area which is not in line with Council policy.

Summary: Objection to Rochford Core Strategy, 175 houses in Hawkwell is UNSOUND.

I am writing to object to the above proposal as so many new houses in the ward of Hawkwell West is UNSOUND because the vital requirements of PPS12 are not met in terms of sustainability. My reasons are as follows:

We have limited public transport with only one bus an hour between Rayleigh and Southend. There is little or no possibility that this situation will change in the long term. The railway station is not within comfortable walking distance of the planned site. The local shops are not close by. Because of these factors, transport by car will be vital and the existing roads are already over congested and will not be able to sustain the extra volumes of traffic generated by such a large number of new houses.

Hawkwell is a beautiful semi-rural area which will be destroyed by the loss of valuable green belt. The population would be greatly increased almost overnight and the character of this village would be destroyed. There is currently an abundance of varied wild life living on the planned site which would be lost forever. To sum up, there are NO social, economic or environmental benefits whatsoever with regard to this plan.

In addition the Core Strategy is UNSOUND because it does not fulfil the principles expressed therein as follows:

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

The Core Strategy says 'locate development in areas where alternatives to car use are more viable'. As stated above, this is not possible in Hawkwell West. The Core Strategy also states that 'planning should be well related to existing

Core Strategy Submission Document

O - 16403 - 8275 - Policy H2 - Extensions to residential envelopes and phasing - iii

16403 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

public transport where possible', 'reduce the requirement to travel' and accompany any development with requisite highway infrastructure to 'mitigate their impact on the existing network'. There is no space in Hawkwell West for the development of local roads. As I have already explained above, there is little likelihood that public transport in this area would be improved. Finally, such a large scale development would lead to an unwelcome accumulation of new build houses disproportionate to the area which is not in line with Council policy.

Change to Plan The location of Hawkwell West should be removed by the Inspection and the allocation moved to a sustainable location

Appear at exam? Not Specified **Soundness Tests** iii

Core Strategy Submission Document

O - 16404 - 14210 - Policy H2 - Extensions to residential envelopes and phasing - iii

16404 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr C Wood [14210]

Barnmead
231 Rectory Road
Hawkwell
Hockley
Essex
SS5 4LF

Agent: N/A

Full Text: Re: Objection to the Core Strategy, 175 houses in Hawkwell is unsound.

I am writing to object to the proposed housing development in Hawkwell. I believe it to be unsound because of the requirements of PPS12 are not met in terms of sustainability. Therefore the proposal should be removed by the inspector and moved to a sustainable location.

It is unsustainable because of the following:

1. There is a very limited, and deteriorating, public transport service here.
2. There are already serious bottlenecks at the Rectory Road railway bridge and at Nursery Corner, ie either side of the proposed development site.
3. There are no alternatives for the increased numbers of vehicular movements and no prospect of road improvements.
4. There are no shops or railway stations within walking distance, therefore there will be even more vehicle movements. See 2 above.
5. We are in a semi rural loction here. It is not suitable for a large development. We have lost a large part of the identity and character of Hawkwell over the years because of the so-called Ribbon development and all the in-fill building that has been allowed and seemingly encouraged by RDC.
6. The loss of more Green Belt land is not acceptable.
7. There will be significant loss of wildlife and habitat. If not immediately then surely in the future. Learn the previous lessons from around the world that when we interfere with nature it always comes back to bite in one way or another.
8. I am unable to see any social or economic benefits within the proposed development. There is only one business close by that will gain, that being Clements Hall. Surely that gain will only be marginal.
9. This whole proposal is not in keeping with the existing core strategy. It does not benefit Hawkwell socially, economically or environmentally. It will intensify the housing density, affecting the character of Hawkwell. It is not related to existing public transport availability. It certainly will not reduce the requirement to travel or be any help to people already living in Hawkwell that travel on a daily basis.

Summary: I am writing to object to the proposed housing development in Hawkwell. I believe it to be unsound because of the requirements of PPS12 are not met in terms of sustainability.

It is unsustainable because of the following:

1. There is a very limited, and deteriorating, public transport service here.
2. There are already serious bottlenecks at the Rectory Road railway bridge and at Nursery Corner, ie either side of the proposed development site.
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Change to Plan The proposal should be removed by the inspector and moved to a sustainable location.

Appear at exam? Not Specified **Soundness Tests** iii

Core Strategy Submission Document

16405 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: H Shaw [9749]

401 Rectory Road
Hawkwell
Hockley
Essex

Agent: N/A

Full Text: Objection to Rochford Core Strategy, 175 houses in Hawkwell UNSOUND

The proposal in the Rochford Core Strategy for this many houses in the Ward of Hawkwell West is UNSOUND because the vital requirements of PPS12 are not met in terms of sustainability and, therefore, the location of Hawkwell West should be removed by The Inspector and the allocation moved to a sustainable location. In summary the reasons that development in this location is unsustainable under PPS12 are as follows:

1. Travel

1. Rectory Road has always been busy and since the development of Cherry Orchard Way this has been exacerbated by a constant stream of traffic with queues forming at the Nursery Corner/B1013 junction throughout the day but especially during the morning and evening rush hours. It cannot take any more feeder roads.
2. The proposal for 330 new dwellings will mean more cars. As most households now have at least two cars the number of journeys per day could increase by 1500, there would also be the extra traffic caused by tradesmen, the services eg gas, electric etc and visitors to the new residents.
3. Rectory Road is also used by very heavy lorries serving, among other places the sports centre and a local farm at Windsor Road, these vehicles have great difficulty negotiating the nursery corner junction and regularly mount the grass verges.
4. For pedestrians, crossing the roads to get to the bus stop at this very busy junction is extremely dangerous because of the speed of traffic and the very limited vision.
5. The area has one bus an hour to Southend or Rayleigh, there is NO BUS SERVICE AFTER 6.30pm. ACCORDING TO THE LATEST TIME TABLE ISSUED BY ARRIVA! (Except on Saturday 7.30pm.) This makes a mockery of the intention to limit car usage!
6. There are no schools within safe walking distance.
7. There are no safe cycle tracks. The road is far too dangerous for any but the most competent cyclist.
8. The walk to Hockley rail station takes 25 minutes, to Rochford rail station it takes 40 minutes.
9. The one lane, traffic light controlled section of Rectory Road at the railway bridge causes a bottleneck and discourages drivers from using the eastern end of the road.

2. Environment

1. The development proposed would completely ruin the character of the area. The site proposed consists of mature shrub-land and woodland that has remained undisturbed for decades. It supports a great variety of wild life and is a natural appendage to the more open habitat provided by the adjacent Spencer's Park. The consequent loss of wildlife can not be justified.
2. The area absorbs a great amount of rain water and is a natural defence against flooding in the area. The brook and pond bordering Spencer's Park is only adequate to contain present rain water levels and could hardly cope with the extra pressure put on it from this development.
3. The density of the proposed development is three times greater than that of surrounding properties. Currently this is mainly a low level building area consisting mainly of bungalows, the proposed two and three storey buildings will be totally out of character.
4. There seems to be little provision for the influx of younger people, particularly teenagers who will require social facilities that are easily and cheaply available. The provisional figure of 30 school age children by David Wilson Homes is grossly underestimated.
5. The traffic movement implications have been dealt with under 'travel' above but the provision of a few footpaths and cycle tracks will in no way be adequate. These youngsters will not even have a safe walk to their various schools owing to the density and speed of the traffic using Rectory Road and/or the B1013.
6. Depending on the size and nature of the businesses in the proposed retail area, there is concern that outlets comprising market leaders will attract shoppers from outside the immediate area thus adding to the congestion on our roads.

In addition the Core Strategy is UNSOUND because it does not fulfil the principles that are expressly stated in the Core Strategy as it relates proposal for Hawkwell. Please see the following:

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of the existing settlement in Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

Core Strategy Submission Document

16405 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

The core strategy says 'locate development in areas where alternatives to car use are more viable', 'reduce the requirement to travel' and accompany any development with the requisite highway infrastructure to 'mitigate their impact on the existing network'. It is not possible to do this in Hawkwell West as there is no space for development of local roads, especially in Rectory Road, and any development here would increase the requirement to travel, especially by car. Moving on to Public Transport the Core Strategy states that 'planning should be well related to existing public transport where possible'. There is just one bus to and from Southend/Rayleigh per hour with no prospect of Arriva providing an appropriate service in the long term.

Finally, such a large scale development would lead to an unwelcome strip coalescence of built settlements which is not in line with council policy.

Summary:

Objection to Rochford Core Strategy, 175 houses in Hawkwell UNSOUND

The proposal in the Rochford Core Strategy for this many houses in the Ward of Hawkwell West is UNSOUND because the vital requirements of PPS12 are not met in terms of sustainability. In summary the reasons that development in this location is unsustainable under PPS12 are as follows:

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2. The area absorbs a great amount of rain water and is a natural defence against flooding in the area. The brook and pond bordering Spencer's Park is only adequate to contain present rain water levels and could hardly cope with the extra pressure put on it from this development.
3. The density of the proposed development is three times greater than that of surrounding properties. Currently this is mainly a low level building area consisting mainly of bungalows, the proposed two and three storey buildings will be totally out of character.
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6. Depending on the size and nature of the businesses in the proposed retail area, there is concern that outlets comprising market leaders will attract shoppers from outside the immediate area thus adding to the congestion on our roads.

In addition the Core Strategy is UNSOUND because it does not fulfil the principles that are expressly stated in the Core Strategy as it relates proposal for Hawkwell. Please see the following:

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of the existing settlement in Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

Core Strategy Submission Document

O - 16405 - 9749 - Policy H2 - Extensions to residential envelopes and phasing - iii

16405 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

The core strategy says 'locate development in areas where alternatives to car use are more viable', 'reduce the requirement to travel' and accompany any development with the requisite highway infrastructure to 'mitigate their impact on the existing network'. It is not possible to do this in Hawkwell West as there is no space for development of local roads, especially in Rectory Road, and any development here would increase the requirement to travel, especially by car. Moving on to Public Transport the Core Strategy states that 'planning should be well related to existing public transport where possible'. There is just one bus to and from Southend/Rayleigh per hour with no prospect of Arriva providing an appropriate service in the long term.

Finally, such a large scale development would lead to an unwelcome strip coalescence of built settlements which is not in line with council policy.

Change to Plan The location of Hawkwell West should be removed by The Inspector and the allocation moved to a sustainable location.

Appear at exam? Not Specified **Soundness Tests** iii

Core Strategy Submission Document

16406 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mrs B Shaw [9751]

401 Rectory Road
Hawkwell
Hockley
Essex
SS5 4JX

Agent: N/A

Full Text: Objection to Rochford Core Strategy, 175 houses in Hawkwell UNSOUND

The proposal in the Rochford Core Strategy for this many houses in the Ward of Hawkwell West is UNSOUND because the vital requirements of PPS12 are not met in terms of sustainability and, therefore, the location of Hawkwell West should be removed by The Inspector and the allocation moved to a sustainable location. In summary the reasons that development in this location is unsustainable under PPS12 are as follows:

1. Travel

1. Rectory Road has always been busy and since the development of Cherry Orchard Way this has been exacerbated by a constant stream of traffic with queues forming at the Nursery Corner/B1013 junction throughout the day but especially during the morning and evening rush hours. It cannot take any more feeder roads.
2. The proposal for 330 new dwellings will mean more cars. As most households now have at least two cars the number of journeys per day could increase by 1500, there would also be the extra traffic caused by tradesmen, the services eg gas, electric etc and visitors to the new residents.
3. Rectory Road is also used by very heavy lorries serving, among other places the sports centre and a local farm at Windsor Road, these vehicles have great difficulty negotiating the nursery corner junction and regularly mount the grass verges.
4. For pedestrians, crossing the roads to get to the bus stop at this very busy junction is extremely dangerous because of the speed of traffic and the very limited vision.
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6. There are no schools within safe walking distance.
7. There are no safe cycle tracks. The road is far too dangerous for any but the most competent cyclist.
8. The walk to Hockley rail station takes 25 minutes, to Rochford rail station it takes 40 minutes.
9. The one lane, traffic light controlled section of Rectory Road at the railway bridge causes a bottleneck and discourages drivers from using the eastern end of the road.

2. Environment

1. The development proposed would completely ruin the character of the area. The site proposed consists of mature shrub-land and woodland that has remained undisturbed for decades. It supports a great variety of wild life and is a natural appendage to the more open habitat provided by the adjacent Spencer's Park. The consequent loss of wildlife can not be justified.
2. The area absorbs a great amount of rain water and is a natural defence against flooding in the area. The brook and pond bordering Spencer's Park is only adequate to contain present rain water levels and could hardly cope with the extra pressure put on it from this development.
3. The density of the proposed development is three times greater than that of surrounding properties. Currently this is mainly a low level building area consisting mainly of bungalows, the proposed two and three storey buildings will be totally out of character.
4. There seems to be little provision for the influx of younger people, particularly teenagers who will require social facilities that are easily and cheaply available. The provisional figure of 30 school age children by David Wilson Homes is grossly underestimated.
5. The traffic movement implications have been dealt with under 'travel' above but the provision of a few footpaths and cycle tracks will in no way be adequate. These youngsters will not even have a safe walk to their various schools owing to the density and speed of the traffic using Rectory Road and/or the B1013.
6. Depending on the size and nature of the businesses in the proposed retail area, there is concern that outlets comprising market leaders will attract shoppers from outside the immediate area thus adding to the congestion on our roads.

In addition the Core Strategy is UNSOUND because it does not fulfil the principles that are expressly stated in the Core Strategy as it relates proposal for Hawkwell. Please see the following:

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of the existing settlement in Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

Core Strategy Submission Document

16406 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

The core strategy says 'locate development in areas where alternatives to car use are more viable', 'reduce the requirement to travel' and accompany any development with the requisite highway infrastructure to 'mitigate their impact on the existing network'. It is not possible to do this in Hawkwell West as there is no space for development of local roads, especially in Rectory Road, and any development here would increase the requirement to travel, especially by car. Moving on to Public Transport the Core Strategy states that 'planning should be well related to existing public transport where possible'. There is just one bus to and from Southend/Rayleigh per hour with no prospect of Arriva providing an appropriate service in the long term.

Finally, such a large scale development would lead to an unwelcome strip coalescence of built settlements which is not in line with council policy.

Summary:

Objection to Rochford Core Strategy, 175 houses in Hawkwell UNSOUND

The proposal in the Rochford Core Strategy for this many houses in the Ward of Hawkwell West is UNSOUND because the vital requirements of PPS12 are not met in terms of sustainability. In summary the reasons that development in this location is unsustainable under PPS12 are as follows:

1. Travel

1. Rectory Road has always been busy and since the development of Cherry Orchard Way this has been exacerbated by a constant stream of traffic with queues forming at the Nursery Corner/B1013 junction throughout the day but especially during the morning and evening rush hours. It cannot take any more feeder roads.
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2. Environment

1. The development proposed would completely ruin the character of the area. The site proposed consists of mature shrub-land and woodland that has remained undisturbed for decades. It supports a great variety of wild life and is a natural appendage to the more open habitat provided by the adjacent Spencer's Park. The consequent loss of wildlife can not be justified.
2. The area absorbs a great amount of rain water and is a natural defence against flooding in the area. The brook and pond bordering Spencer's Park is only adequate to contain present rain water levels and could hardly cope with the extra pressure put on it from this development.
3. The density of the proposed development is three times greater than that of surrounding properties. Currently this is mainly a low level building area consisting mainly of bungalows, the proposed two and three storey buildings will be totally out of character.
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5. The traffic movement implications have been dealt with under 'travel' above but the provision of a few footpaths and cycle tracks will in no way be adequate. These youngsters will not even have a safe walk to their various schools owing to the density and speed of the traffic using Rectory Road and/or the B1013.
6. Depending on the size and nature of the businesses in the proposed retail area, there is concern that outlets comprising market leaders will attract shoppers from outside the immediate area thus adding to the congestion on our roads.

In addition the Core Strategy is UNSOUND because it does not fulfil the principles that are expressly stated in the Core Strategy as it relates proposal for Hawkwell. Please see the following:

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of the existing settlement in Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

Core Strategy Submission Document

O - 16406 - 9751 - Policy H2 - Extensions to residential envelopes and phasing - iii

16406 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

The core strategy says 'locate development in areas where alternatives to car use are more viable', 'reduce the requirement to travel' and accompany any development with the requisite highway infrastructure to 'mitigate their impact on the existing network'. It is not possible to do this in Hawkwell West as there is no space for development of local roads, especially in Rectory Road, and any development here would increase the requirement to travel, especially by car. Moving on to Public Transport the Core Strategy states that 'planning should be well related to existing public transport where possible'. There is just one bus to and from Southend/Rayleigh per hour with no prospect of Arriva providing an appropriate service in the long term.

Finally, such a large scale development would lead to an unwelcome strip coalescence of built settlements which is not in line with council policy.

Change to Plan The location of Hawkwell West should be removed by The Inspector and the allocation moved to a sustainable location

Appear at exam? Not Specified **Soundness Tests** iii

Core Strategy Submission Document

O - 16407 - 14211 - Policy H2 - Extensions to residential envelopes and phasing - i

16407 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr and Mrs Hanson [14211]

86 Thorpe Road
Hawkwell
Hockley
Essex
SS5 4JT

Agent: N/A

Full Text: Objection to Rochford Core Strategy, 175 houses in Hawkwell is UNSOUND.

We write this letter with regards to the 175 houses that you wish to build in our community. We strongly object to the building of these houses on our green belt land. This is a semi rural area with a village like feel and this will be lost if building goes ahead. This location just cannot benefit from this development at all. You/they may say they will build extra doctors/health surgeries, schools etc but what about the things that will be lost such as:

loss of green belt
loss of wildlife
a complete loss of character
the fact that the location is unsuitable for large development

The roads just cannot take any extra traffic and there is no space for development on the local roads, especially Rectory Road. We are some distance from the shops and the train station. There is just one bus to and from Southend/Rayleigh per hour and Arriva have no intention of providing an appropriate service in the long term. This means all these extra people will need to travel by car, hence cloggin gup the roads!

We would just like to point out that when we brought our property, we did so because of its location. It was sold to us as semi rural and we thought it an ideal area to raise our family. If we wanted to live and raise our family in the middle of a housing estate, that is what we would have brought!

We strongly urge you to take our points on board and put a stop to this development. Please listen to your community!

Summary:

We write this letter with regards to the 175 houses that you wish to build in our community. We strongly object to the building of these houses on our green belt land. This is a semi rural area with a village like feel and this will be lost if building goes ahead. This location just cannot benefit from this development at all. You/they may say they will build extra doctors/health surgeries, schools etc but what about the things that will be lost such as:

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We strongly urge you to take our points on board and put a stop to this development. Please listen to your community!

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16408 - 9587 - Policy H2 - Extensions to residential envelopes and phasing - None

16408 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr A W Homer [9587]

Agent: N/A

'Les Pomeras'
Ironwell Lane
Hawkwell
Essex
SS5 4JY

Full Text:

I would like to record my objections to the Rochford Core Strategy. 175 additional houses in Hawkwell is for the following reasons a completely unsound strategy.

1. The increase in car use caused by the proposed housing increase will cause even heavier congestion at the Spa junction (Hockley), railway bridge junction (Rochford) and along Rectory Road itself.
2. There is no way the highways can be improved to ease the congestion already in existence and due to the increase should this proposal be implemented can only get worse. Rectory Road is already built up to such an extent the highway cannot be improved enough to cope with the additional traffic envisaged.
3. Shops from Rectory Road area are accessible only by car. Car parking facility at the Main Road and Golden Cross shopping centres are already inadequate during most of the day.
4. Public transport from Hawkwell is almost non-existent. A car ride to the nearest railway station (more road congestion) or one bus per hour to Rayleigh/Southend with no prospect of improved service from Arriva.

The environmental issue is also a very serious issue. Hawkwell is a semi-rural location with Green Belt land and wild life as part of its character. Should this strategy be implemented these characteristics will be lost and the whole character of Hawkwell dramatically changed. I find no social, economic or environmental benefits from the Strategy whatsoever.

The whole strategy is unsound because it fails to follow the Government Planning Policy PPS12 on all the points listed above.

Hawkwell therefore should be exempt from this development and moved to a more sustainable location!

Summary:

I would like to record my objections to the Rochford Core Strategy. 175 additional houses in Hawkwell is for the following reasons a completely unsound strategy.

1. The increase in car use caused by the proposed housing increase will cause even heavier congestion at the Spa junction (Hockley), railway bridge junction (Rochford) and along Rectory Road itself.
2. There is no way the highways can be improved to ease the congestion already in existence and due to the increase should this proposal be implemented can only get worse. Rectory Road is already built up to such an extent the highway cannot be improved enough to cope with the additional traffic envisaged.
3. Shops from Rectory Road area are accessible only by car. Car parking facility at the Main Road and Golden Cross shopping centres are already inadequate during most of the day.
4. Public transport from Hawkwell is almost non-existent. A car ride to the nearest railway station (more road congestion) or one bus per hour to Rayleigh/Southend with no prospect of improved service from Arriva.

The environmental issue is also a very serious issue. Hawkwell is a semi-rural location with Green Belt land and wild life as part of its character. Should this strategy be implemented these characteristics will be lost and the whole character of Hawkwell dramatically changed. I find no social, economic or environmental benefits from the Strategy whatsoever.

The whole strategy is unsound because it fails to follow the Government Planning Policy PPS12 on all the points listed above.

Change to Plan

Hawkwell therefore should be exempt from this development and moved to a more sustainable location!

Appear at exam?

Not Specified

Soundness Tests

None

Core Strategy Submission Document

O - 16427 - 10683 - Policy H2 - Extensions to residential envelopes and phasing - i

16427 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr T Gleadall [10683]

2 Wood End
Hockley
Essex
SS5 4QL

Agent: N/A

Full Text: Local Development Framework Core Strategy Submission

I understand that RDC was under government instruction to come up with a Core Strategy proposal, and I believe that it has done a reasonable job in trying to satisfy each parish. However, I have 2 objections with regard to the soundness of the latest proposal in the Hockley area.

Objection

There is currently a traffic flow issue on the Hockley Road at peak times. With the additional proposed housing allocations in Rochford, Hawkwell and Hockley, and the associated increase in number of vehicles, the Spa roundabout in Hockley will become gridlocked. There is no satisfactory solution provided in the Core Strategy submission to overcome the problem of road networks. There is no inexpensive solution to the growing problem. Also, no account has been taken of the further increased traffic related to the proposed airport expansion.

Objection

The latest version of the Core Strategy proposes to relocate existing businesses from Eldon Way and Foundry Industrial Estates in Hockley to greenbelt land in the vicinity of Southend Airport, and to redevelop the estates for commercial, retail, leisure, community, and residential purposes. The number of proposed residential units is not stated independently in the proposal (although it is shown in the Hockley Town Centre Development Plan), but is reported to be 150 - 200 dwellings. The previous version of the Core Strategy did not show any additional housing in the centre of Hockley.

The Hockley Parish Plan (published October 2007) states that there should be no new large housing estates in Hockley due to insufficient infrastructure in terms of schools, healthcare, leisure facilities and road networks. It also states that there should be no loss of greenbelt or open spaces due to housing development. Both of these conditions are broken by the Eldon Way proposal.

The Parish Plan also discusses the traffic flow issues in the centre of Hockley and the approach roads from Rayleigh, Rochford and Ashingdon. The local roads are narrow and could not cope with the additional vehicles generated by 150 - 200 new dwellings in the centre of Hockley, and would be unbearable during the development period with a constant flow of construction lorries.

In a recent Resident Survey in Hockley, completed in October 2009, with reference to Hockley Centre Redevelopment, 87% of responses were against moving businesses out of Eldon Way to make way for major redevelopment, and if redevelopment was enforced, the least favoured type of development was shown to be residential units with just over 1% of response support.

Summary:

Objection

There is currently a traffic flow issue on the Hockley Road at peak times. With the additional proposed housing allocations in Rochford, Hawkwell and Hockley, and the associated increase in number of vehicles, the Spa roundabout in Hockley will become gridlocked. There is no satisfactory solution provided in the Core Strategy submission to overcome the problem of road networks. There is no inexpensive solution to the growing problem. Also, no account has been taken of the further increased traffic related to the proposed airport expansion.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16429 - 9614 - Policy H2 - Extensions to residential envelopes and phasing - i, iii

16429 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr David Jefferies [9614]

1 Thorpe Road
Hockley
Hawkwell
SS5 4EP
UK

Agent: N/A

Full Text: Objection to Rochford Core Strategy, 175 houses in Hawkwell IS UNSOUND

The proposal in the Rochford Core Strategy (the RDC Policy for local development) for this many houses in the Ward of Hawkwell West is UNSOUND because the vital requirements of PPS12 (the Government's Planning Policy) are not met in terms of sustainability, and, therefore, the location of Hawkwell West (South Hawkwell) should be removed by The Inspector and the allocation moved to a sustainable location.

In summary the reasons that development in this location is unsustainable under PPS12 are as follows:

1) Travel

- limited public transport;
- increased car use causing heavy congestion;
- inability to improve highways;
- distance from shops; and
- distance from rail stations.

2) Environment

- semi-rural location unsuitable for large development;
- complete loss of character;
- loss of green belt;
- loss of wildlife; and
- NO social, economic or environmental benefits whatsoever.

In addition, the Core Strategy is UNSOUND because it does not fulfil the principles that are expressly stated in the Core Strategy as it relates to the proposal for Hawkwell.

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of the existing settlement in Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

The Core Strategy says 'locate development in areas where alternatives to car use are more viable', 'reduce the requirement to travel', and accompany any development with requisite highway infrastructure to 'mitigate their impact on the existing network'. It is not possible to do this in Hawkwell West, as there is no space for development of local roads, especially in Rectory Road, and any development here would increase the requirement to travel, especially by car. Moving on to Public Transport the Core Strategy states that 'planning should be well related to existing public transport where possible'. There is just one bus to and from Southend/Rayleigh per hour with no prospect of Arriva providing an appropriate service in the long term.

Finally, such a large scale development would lead to an unwelcome strip coalescence of built settlements which is not in line with Council policy.

Summary:

The proposal in the Rochford Core Strategy (the RDC Policy for local development) for this many houses in the Ward of Hawkwell West is UNSOUND because the vital requirements of PPS12 (the Government's Planning Policy) are not met in terms of sustainability. In summary the reasons that development in this location is unsustainable under PPS12 are as follows:

1) Travel

- limited public transport;
- increased car use causing heavy congestion;
- inability to improve highways;
- distance from shops; and
- distance from rail stations.

2) Environment

- semi-rural location unsuitable for large development;
- complete loss of character;
- loss of green belt;
- loss of wildlife; and
- NO social, economic or environmental benefits whatsoever.

In addition, the Core Strategy is UNSOUND because it does not fulfil the principles that are expressly stated in the Core

Core Strategy Submission Document

16429 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Strategy as it relates to the proposal for Hawkwell.

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of the existing settlement in Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

The Core Strategy says 'locate development in areas where alternatives to car use are more viable', 'reduce the requirement to travel', and accompany any development with requisite highway infrastructure to 'mitigate their impact on the existing network'. It is not possible to do this in Hawkwell West, as there is no space for development of local roads, especially in Rectory Road, and any development here would increase the requirement to travel, especially by car. Moving on to Public Transport the Core Strategy states that 'planning should be well related to existing public transport where possible'. There is just one bus to and from Southend/Rayleigh per hour with no prospect of Arriva providing an appropriate service in the long term.

Finally, such a large scale development would lead to an unwelcome strip coalescence of built settlements which is not in line with Council policy.

Change to Plan The location of Hawkwell West (South Hawkwell) should be removed by The Inspector and the allocation moved to a sustainable location.

Appear at exam? Not Specified **Soundness Tests** i, iii

Core Strategy Submission Document

O - 16430 - 14217 - Policy H2 - Extensions to residential envelopes and phasing - i

16430 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr T Grew [14217]

33 Hawkwell Park Drive
Hawkwell
Essex
SS5 4HA

Agent: N/A

Full Text: We are objecting to the proposed building of 175 houses on Green Belt Land in Hawkwell. the main reasons for our objection are:

TRAVEL

- We have very limited public transport
- Which will add to the already congested roads (try getting out of our road at peak times)
- inability to improve highways
- distance from shops causing more people to use their cars and clog up the roads
- distance from railway stations

ENVIRONMENT

- our beautiful semi-rural location should be left as just that it is not suitable for large development
- the character of the area would be lost for ever bigger is not better
- the loss of our very important Green Belt which should remain to fulfill the job it was intended to do
- where will the wildlife go? It is already under extreme pressure we don't need hunting or culling just count the fox and badger corpses on our roads
- We can see NO social, economic or environmental benefits that these plans would bring.

Summary: We are objecting to the proposed building of 175 houses on Green Belt Land in Hawkwell. the main reasons for our objection are:

TRAVEL

- We have very limited public transport
- Which will add to the already congested roads (try getting out of our road at peak times)
- inability to improve highways
- distance from shops causing more people to use their cars and clog up the roads
- distance from railway stations

ENVIRONMENT

- our beautiful semi-rural location should be left as just that it is not suitable for large development
- the character of the area would be lost for ever bigger is not better
- the loss of our very important Green Belt which should remain to fulfill the job it was intended to do
- where will the wildlife go? It is already under extreme pressure we don't need hunting or culling just count the fox and badger corpses on our roads
- We can see NO social, economic or environmental benefits that these plans would bring.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16454 - 14219 - Policy H2 - Extensions to residential envelopes and phasing - i, iii

16454 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mrs M Rivett [14219]

41 Hawkwell Chase
Hawkwell
Essex
SS5 4NG

Agent: N/A

Full Text:

I am writing to object to the above proposal as so many new houses in the ward of Hawkwell West is UNSOUND because the vital requirements of PPS 12 are not met in terms of sustainability and therefore the location of Hawkwell West should be removed by the Inspector and the allocation moved to a sustainable location. My reasons are as follows:

We have limited public transport with only one bus an hour between Rayleigh and Southend. There is little or no possibility that this situation will change in the long term. The railway station is not within comfortable walking distance of the planned site. The local shops are not close by. Because of these factors, transport by car will be vital and the existing roads are already over congested and will not be able to sustain the extra volumes of traffic generated by such a large number of new houses.

Hawkwell is a beautiful semi-rural area which will be destroyed by the loss of valuable green belt. The population would be greatly increased almost overnight and the character of this village would be destroyed. There is currently an abundance of varied wild life living on the planned site which would be lost forever. To sum up, there are NO social, economic or environmental benefits whatsoever with regard to this plan.

In addition the Core Strategy is UNSOUND because it does not fulfil the principles expressed therein as follows:

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

The Core Strategy says 'locate development in areas where alternatives to car use are more viable'. As stated above, this is not possible in Hawkwell West. The Core Strategy also states that 'planning should be well related to existing public transport where possible', 'reduce the requirement to travel' and accompany any development with requisite highway infrastructure to 'mitigate their impact on the existing network'. There is no space in Hawkwell West for the development of local roads. As I have already explained above, there is little likelihood that public transport in this area would be improved. Finally, such a large scale development would lead to an unwelcome accumulation of new build houses disproportionate to the area which is not in line with Council policy.

Summary:

I am writing to object to the above proposal as so many new houses in the ward of Hawkwell West is UNSOUND because the vital requirements of PPS 12 are not met in terms of sustainability. My reasons are as follows:

We have limited public transport with only one bus an hour between Rayleigh and Southend. There is little or no possibility that this situation will change in the long term. The railway station is not within comfortable walking distance of the planned site. The local shops are not close by. Because of these factors, transport by car will be vital and the existing roads are already over congested and will not be able to sustain the extra volumes of traffic generated by such a large number of new houses.

Hawkwell is a beautiful semi-rural area which will be destroyed by the loss of valuable green belt. The population would be greatly increased almost overnight and the character of this village would be destroyed. There is currently an abundance of varied wild life living on the planned site which would be lost forever. To sum up, there are NO social, economic or environmental benefits whatsoever with regard to this plan.

In addition the Core Strategy is UNSOUND because it does not fulfil the principles expressed therein as follows:

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West.

The Core Strategy says 'locate development in areas where alternatives to car use are more viable'. As stated above, this is not possible in Hawkwell West. The Core Strategy also states that 'planning should be well related to existing public transport where possible', 'reduce the requirement to travel' and accompany any development with requisite highway infrastructure to 'mitigate their impact on the existing network'. There is no space in Hawkwell West for the development of local roads. As I have already explained above, there is little likelihood that public transport in this area would be improved. Finally, such a large scale development would lead to an unwelcome accumulation of new build houses disproportionate to the area which is not in line with Council policy.

Change to Plan The location of Hawkwell West should be removed by the Inspector and the allocation moved to a sustainable location.

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

Core Strategy Submission Document

O - 16454 - 14219 - Policy H2 - Extensions to residential envelopes and phasing - i, iii

16454 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Appear at exam? Not Specified

Soundness Tests i, iii

Core Strategy Submission Document

O - 16455 - 14220 - Policy H2 - Extensions to residential envelopes and phasing - i

16455 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: W E Jones [14220]

22 Tudor Way
Hawkwell
Essex
SS5 4EY

Agent: N/A

Full Text:

I am writing to express my objection to the Rochford Core Strategy which proposes to add 175 houses to the ward of West Hawkwell. My understanding is that the strategy is intended to take advantage of development opportunities which provide social, economic and environmental benefits to the community. In fact there are no such benefits. However there are considerable disbenefits.

The roads in the area are already extremely busy in particular the B1013 and Rectory Road with a particular bottleneck at their junction. There is no ability to improve them particularly as each is accessed via a low and narrow railway bridge. Additional house will add yet more traffic compounded by the extremely limited public transport available to travel to the natural shopping areas to the east in Rochford and the west in Hockley. I fail to see how this squares within the strategy's aim of locating development where alternatives to car use are more viable.

There will be a loss of green belt land and an adverse effect on wild life. This will lead to a loss of the semi rural characters of the area. Indeed the strategy notes that there is a limit to the how much infilling and intensification existing settlements can sustain without their character being adversely affected. This limit has been reached in West Hawkwell. An increase in housing of the size envisaged is likely to lead to a continuous strip of urban development stretching from Rochford to Hawkwell destroying the separate identity of both.

For the above reasons I contend that the part of the core strategy related to Hawkwell West is unsound because it is not justified and should be deleted.

Summary:

I am writing to express my objection to the Rochford Core Strategy which proposes to add 175 houses to the ward of West Hawkwell. My understanding is that the strategy is intended to take advantage of development opportunities which provide social, economic and environmental benefits to the community. In fact there are no such benefits. However there are considerable disbenefits.

The roads in the area are already extremely busy in particular the B1013 and Rectory Road with a particular bottleneck at their junction. There is no ability to improve them particularly as each is accessed via a low and narrow railway bridge. Additional house will add yet more traffic compounded by the extremely limited public transport available to travel to the natural shopping areas to the east in Rochford and the west in Hockley. I fail to see how this squares within the strategy's aim of locating development where alternatives to car use are more viable.

There will be a loss of green belt land and an adverse effect on wild life. This will lead to a loss of the semi rural characters of the area. Indeed the strategy notes that there is a limit to the how much infilling and intensification existing settlements can sustain without their character being adversely affected. This limit has been reached in West Hawkwell. An increase in housing of the size envisaged is likely to lead to a continuous strip of urban development stretching from Rochford to Hawkwell destroying the separate identity of both.

Change to Plan

The core strategy related to Hawkwell West is unsound because it is not justified and should be deleted.

Appear at exam?

Not Specified

Soundness Tests

i

Core Strategy Submission Document

O - 16456 - 14221 - Policy H2 - Extensions to residential envelopes and phasing - i

16456 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: R M Jones [14221]

22 Tudor Way
Hawkwell
Hockley
Essex
SS5 4EY

Agent: N/A

Full Text:

I am writing to express my objection to the Rochford Core Strategy which proposes to add 75 houses to the ward to West Hawkwell. My understanding is that the strategy is intended to take advantage of development opportunities which provide social, economic and environmental benefits to the community. In fact there are no such benefits. However there are considerable disbenefits.

The roads in the area are already extremely busy in particular the B1013 and Rectory Road with a particular bottleneck at their junction. There is no ability to improve them particularly as each is accessed via a low and narrow railway bridge. Additional houses will add yet more traffic compounded by the extremely limited public transport available to travel to the natural shopping areas to the east in Rochford and the west in Hockley. I fail to see how this squares with the strategy's aim of locating development where alternatives to car use are more viable.

There will be a loss of green belt land and an adverse effect on wild life. This will lead to a loss of the semi-rural character of the area. Indeed the strategy notes that there is a limit to the how much infilling and intensification existing settlements can sustain without their character being adversely affected. This limit has been reached in West Hawkwell. An increase in housing of the size envisaged is likely to lead to a continuous strip of urban development stretching from Rochford to Hawkwell destroying the separate identify of both.

For the above reasons I contend that the part of the core strategy related to Hawkwell West is unsound because it is not justified and should be deleted.

Summary:

I am writing to express my objection to the Rochford Core Strategy which proposes to add 75 houses to the ward to West Hawkwell. My understanding is that the strategy is intended to take advantage of development opportunities which provide social, economic and environmental benefits to the community. In fact there are no such benefits. However there are considerable disbenefits.

The roads in the area are already extremely busy in particular the B1013 and Rectory Road with a particular bottleneck at their junction. There is no ability to improve them particularly as each is accessed via a low and narrow railway bridge. Additional houses will add yet more traffic compounded by the extremely limited public transport available to travel to the natural shopping areas to the east in Rochford and the west in Hockley. I fail to see how this squares with the strategy's aim of locating development where alternatives to car use are more viable.

There will be a loss of green belt land and an adverse effect on wild life. This will lead to a loss of the semi-rural character of the area. Indeed the strategy notes that there is a limit to the how much infilling and intensification existing settlements can sustain without their character being adversely affected. This limit has been reached in West Hawkwell. An increase in housing of the size envisaged is likely to lead to a continuous strip of urban development stretching from Rochford to Hawkwell destroying the separate identify of both.

Change to Plan

The part of the core strategy related to Hawkwell West is unsound because it is not justified and should be deleted.

Appear at exam?

Not Specified

Soundness Tests

i

Core Strategy Submission Document

O - 16458 - 7507 - Policy H2 - Extensions to residential envelopes and phasing - ii

16458 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr S Welsh [7507]

Hanover Land Trust
35 Castle Road
Rayleigh
Essex
SS6 7QD

Agent: N/A

Full Text: We consider the DPD is potentially unsound depending on the final selection of specific sites or site in South West Hullbridge.

Please see attached statements 1, 2, 3 and 4 evidential statement.

The precise wording should correlate to the proposal of the attached statements, although the issue may be resolved by publication of the allocations development plan document.

Oral participation will depend on whether the proposed site is included in the allocation development plan document for specific sites for future development, if the proposed site is included oral participation will not be required or necessary.

Summary: We consider the DPD is potentially unsound depending on the final selection of specific sites or site in South West Hullbridge.

Please see attached statements 1, 2, 3 and 4 evidential statement.

Change to Plan The precise wording should correlate to the proposal of the attached statements, although the issue may be resolved by publication of the allocations development plan document.

Appear at exam? Yes

Soundness Tests ii

Core Strategy Submission Document

O - 16467 - 7342 - Policy H2 - Extensions to residential envelopes and phasing - i

16467 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Rawreth Parish Council (Mrs H Bloomfield) [7342] **Agent:** N/A

Rawreth Parish Council
103 Downhall Park
Way Rayleigh
Essex
SS6 9QZ
01268 631821

Full Text:

LDF - Preferred Options - Rayleigh conurbation.

On behalf of Rawreth Parish Council I confirm that this letter is a formal response of objection to the final draft of Rochford District Councils Core Strategy Preferred Options document.

Firstly, at no time has the Parish of Rawreth been included or mentioned in any "Tier" on page 33 of the document, the criteria for allocation of houses - within the Core Strategy. If it had been included it should have been in Tier 4 and this is, therefore, UNSOUND.

The Parish Council believes that to develop 550 houses in one place within area no: 144, land to the north of London Road and then to add a further 220 to the Rawreth Industrial Estate area will totally destroy the character and rural outlook of Rawreth and surrounding areas. It will destroy the residents' "strong sense of identity within their own settlement" and is, therefore, UNSOUND.

The huge development of 550 houses is totally unacceptable. The land north of London Road is good quality agricultural land which is protected by the Green Belt -GB1 - fulfils all purposes under PPG2 and should be retained as such. Once used for development this land can never be returned to agricultural use, and if you continue to erode into our Green Belt and farmland it will be lost forever.

The Parish Council believe a proportion of the houses required to be built in our area should compliment and enhance Rawreth, cause as little extra congestion to our already heavily overcrowded roads as possible and provide a pleasant environment for those people wishing to move to the area. This particular area is part of the "Gateway to Rochford" and is the "strategic buffer" between Rayleigh and Wickford. Reference is made in the Core Strategy document to "avoiding coalescence" of villages/towns, however a development of this size immediately erodes the buffer between Rayleigh, Rawreth and Wickford, starts coalescence, destroys the rural character of Rawreth and, therefore, is UNSOUND.

The Core Strategy Document details Rochford District Councils priorities and objectives and details how the role of the Core Strategy features in achieving these. In support of the Parish Councils observations and alternative proposals they comment as follows.

Page 5 "Fostering greater community cohesion"

Development of land between Rawreth Lane and north of London Road will not give any community cohesion at all, it will simply be an extension to the west of Rayleigh giving residents no real sense of belonging, they will live within the Parish of Rawreth, yet they will be considered as living in Rayleigh as has been proved with other developments along Rawreth Lane such as Laburnum Way.

Page 12 "Priority 5 Essex roads are safer less congested and everyone has access to essential services"

The roads and infrastructure in the Rawreth area are completely full to capacity. The A127, A1245, A129 London Road, Rawreth Lane and Watery Lane just cannot take any more traffic and the proposed development on land to the north of London Road will increase traffic to a completely unsustainable level. On numerous occasions this year incidents within and on the outskirts of the Parish have brought traffic to a standstill for hours along London Road, Rawreth Lane, Watery Lane/Beeches Road and the Hullbridge Road. It took some residents 1 ¼ hours to proceed along Rawreth Lane and into Hullbridge - a distance of 1 1/2 miles.

The proposed development at the western edge of Hullbridge, which is, in fact, largely in Rawreth would also greatly increase the traffic problems in the area. Rawreth Parish Council understand there would be a proposal to "widen/straighten" Watery Lane/Beeches Road, with a roundabout at the junction with the Hullbridge Road. This is an extremely dangerous junction even at the present time and would become increasingly so. There is also the question of where the traffic would go when it reaches Battlesbridge at the Western end, it cannot possibly cross the Bridge as this is "restricted" and in a Conservation Area, therefore, it would have to turn left and proceed to the A1245 - a very dangerous junction.

Beeches Road/Watery Lane is also shown in the document as a new cyclist route. Surely this is a conflict of interest, a road widening/straightening proposal coupled with a cycle route.

Page 33 "Tier Settlements"

Nowhere in the Core Strategy Document is Rawreth Parish actually mentioned, it features in the "all other settlements tier 4" and is referred to as "land north of London Road Rayleigh" or "West Rayleigh" yet, the housing allocation of 550 dwellings between 2015 and 2021 and the 220 planned for the Rawreth Industrial Estate is the largest that any area is taking. Rawreth Parish currently has 380 dwellings and an electorate of 812, yet the proposed housing figures are set to increase the overall number of dwellings in the Parish by 203%.

Pages 34 to 36 "The efficient use of land for housing" and "Extensions to residential envelopes and phasing"

The Core Strategy Document states that "the Council recognises the importance of making best use of brownfield land" and "whilst the Council acknowledge that the housing requirement stipulated in the East of England Plan is a minimum, it must also be mindful of the need to maintain Green Belt as far as possible" yet the proposed 550 houses on the land

Core Strategy Submission Document

16467 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

north of London Road will all be built on Green Belt land of high agricultural value. The document states that "the Council will direct development to the most sustainable locations on the edge of settlements having regard to:"

"The potential to avoid areas of constraint (such as areas at risk of flooding, sites of ecological importance"

"The historical, agricultural and ecological value of land"

"The potential to create a defensible Green Belt Boundary and

"The avoidance of coalescence with neighbouring settlements"

Yet these key factors all seem to have been ignored when choosing the site to the north of London Road and, therefore, the proposal is UNSOUND. The Parish of Rawreth has a history of flooding, the land in Rawreth Lane will drain into the already overloaded brook system and the Services in the area would be unable to cope with this increase in housing - drains and sewers are already working to capacity. Heavy rain earlier in the year resulted in flooding in Watery Lane and the Rawreth Brook system has been very close to flooding twice already this year. During a meeting between the Parish Council and the Environment Agency we were advised that this situation will worsen with increased housing.

Page 42 "Gypsy and Traveller Accommodation"

This section details the need for an allocation of 15 pitches by 2011, it also states that they "will examine the potential of current unauthorised sites to meet this need" and that "sites will be allocated in the west of the District" The west of the District is in fact Rawreth, but yet again the Parish name has not been detailed. The Parish already has an unauthorised site which is the subject of an enforcement case and although well kept is on the brow of a hill on a main highway with restricted access which Essex County Council have already raised concerns about, this is not a site that should be considered as part of the requirement due to its location, but also, why is the allocation of all 15 pitches being detailed to one area?

Page 43 to 44 "Appendix 1"

Details of all the infrastructure to accompany residential development is listed, yet there are no detailed costs, have these been done? And are these achievable? Large numbers of housing in one area, as stated in the infrastructure requirements, will necessitate a new primary school. County figures suggest that there will be surplus places in Rayleigh schools even with new housing. Obviously these will be in the wrong parts of the town so increasing the risk that an existing school could close. It makes sense to spread the development in smaller sites around the town, avoiding closure and preventing unnecessary provision of a new school.

Page 57 "Strategies, Activities and Actions - The Green Belt"

The document states that "The Council will continue to support the principals of restricting development in the Green Belt, as set out in PPG2 and will preserve the character and openness of the Green Belt" it further states that "a small proportion of the District's Green Belt will have to have its designation reviewed to allow development" The entire development of 550 houses planned for land north of London Road is all on Green Belt land as is the land at Hullbridge, how does this equate to a "small proportion"?

The Councils own Policy GB1- Green Belt Protection states "The Council will allocate the minimum amount of Green Belt land necessary to meet the District's housing and employment needs" and that they will "direct development away from the Green Belt as far as is practicable and will prioritise the protection of the Green Belt land based on how well the land helps achieve the purposes of the Green Belt".

This area of land confirms all 5 purposes of the national PPG2 - Green Belt:-

It prevents the unrestricted sprawl of western Rayleigh

It provides a barrier to prevent the ultimate merging of Rayleigh, Rawreth and Wickford

It assists in safeguarding the countryside from encroachment

It preserves the setting and special character of historic towns

Assists in urban regeneration, by encouraging the recycling of derelict and other urban land

Rawreth Parish Council have observed that there are a number of sites that were put forward in the "Call for Sites" that are pre-used brownfield land in the Green Belt land, and as such would prove beneficial and in their opinion should have been considered for development. Their non-inclusion as "brownfield" sites makes the current proposals

UNSOUND:

Site No; 73 Hambro Nursery a site of approximately 3.93 hectares, coupled with the adjacent site Clovelly, would provide between 200 and 250 houses in an area of approximately 4.85 hectares this area would have good access directly from the A1245 and if expanded north westward to include land up to and around the Village Hall, approximately another 2.08 hectares could produce between 50 and 80 further houses. This area could be accessed either from the slip road (Chelmsford Road) to the south of the Nevendon Garage or from Church Road.

Both of these sites would remove the need for extra traffic along the A129 and Rawreth Lane which are both already operating well over maximum capacity. This development would require a footbridge for pedestrians, cyclists and horses over the A1245.

Rawreth Parish Council believe these proposals would be sensible infill of these areas and would be on "Brownfield" sites where current businesses are not particularly progressive and would not result in the loss of many jobs. Our figures are quite conservative and we believe that if these sites were chosen a much reduced number of houses would need to be built "North of London Road" on Green Belt land.

Phase 2 - With regard to the houses that are proposed for the Northeast corner of Rawreth/Hullbridge, the Parish Council are concerned that any development would cause considerable extra congestion to the immediate roads. We understand that the thoughts are to "straighten" and improve parts of Watery Lane and Beeches Road to provide access to and through Battlesbridge - a conservation area. Recent experience of deep flooding in Watery Lane with the road closed for several days on 3 occasions in the early part of 2009 proves that this proposal is completely unsustainable. The local drainage systems simply cannot take the amount of run-off experienced now and with further development this

Core Strategy Submission Document

16467 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

would increase the problem.

If this development is to go ahead, the Parish Council believe that a relief road should be built, from the end of Watery Lane, skirting to the west of the Rayleigh Park Estate, crossing Rawreth Lane at a mini-roundabout and entering a vastly improved A129 at approximately Lower Barn Farm. This would take any necessary traffic in and out of the area efficiently.

The Parish Council further believe that the Michelins Farm site No: 49 would be an ideal site for the Rawreth Industrial Estate. This would adjoin proposed industrial sites within the Basildon District and would provide excellent road and transport links. Rawreth Parish Council also proposed that the land opposite Michelins Farm could be used to re-site the illegal Gypsy/Traveller site that is currently situated on the busy A1245. The land opposite Michelins Farm would not only be a much safer site for Gypsy/Traveller pitches, but the correct use of the land would also ensure the environmental improvement of the site as a whole.

All of the above proposals were submitted to Rochford District Council, but they were not taken into consideration in the final draft resulting in the predominant use of Green Belt land for development, bounded by already congested roads and, therefore, the proposals are UNSOUND.

Summary:

The Parish Council believes that to develop 550 houses in one place within area no: 144, land to the north of London Road and then to add a further 220 to the Rawreth Industrial Estate area will totally destroy the character and rural outlook of Rawreth and surrounding areas. It will destroy the residents' "strong sense of identity within their own settlement" and is, therefore, UNSOUND.

The huge development of 550 houses is totally unacceptable. The land north of London Road is good quality agricultural land which is protected by the Green Belt -GB1 - fulfils all purposes under PPG2 and should be retained as such. Once used for development this land can never be returned to agricultural use, and if you continue to erode into our Green Belt and farmland it will be lost forever.

The Parish Council believe a proportion of the houses required to be built in our area should compliment and enhance Rawreth, cause as little extra congestion to our already heavily overcrowded roads as possible and provide a pleasant environment for those people wishing to move to the area. This particular area is part of the "Gateway to Rochford" and is the "strategic buffer" between Rayleigh and Wickford. Reference is made in the Core Strategy document to "avoiding coalescence" of villages/towns, however a development of this size immediately erodes the buffer between Rayleigh, Rawreth and Wickford, starts coalescence, destroys the rural character of Rawreth and, therefore, is UNSOUND.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16477 - 4936 - Policy H2 - Extensions to residential envelopes and phasing - i

16477 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr A James [4936]

25B Belchamps Way
Hockley
Essex
SS5 4NT
uk
01702 207297

Agent: N/A

Full Text: I wish to object on the grounds of unsoundness or legally non compliant due to the following points:

- Producing a heavy weight document that prevented printing and general distribution was an unfair method of consultation.
 - This document does not fully take into consideration the impact of the JAAP report and the reports for the proposed redevelopment of Hockley, Rochford and Rayleigh.
 - The stated government policy of using 60% brown field sites first before green field seems to have been reversed, with many potential sites for building being of a green field nature.
 - If the 175 homes were to be located in one place it will change the nature of the village. We believe it would be better to spread them throughout the Hawkwell area. Consideration should be given to the proximity of shops and schools as due to the lack of public transport additional car usage would result.
 - That comprehensive consultation has not taken place with ECC, other district councils, local parish / town councils, residents associations and other interested parties in and around our district.
 - The additional homes will put an enormous strain on the infrastructure of our area, particularly the road system, which has not been addressed in the document.
 - Loss of Green Belt in our area, which would change our village into a town.
 - Additional vehicles on the roads from the building of the new homes, the additional residents, their delivery services and visitors and the proposed airport expansion traffic.
 - Additional demand on our doctors and dentists.
 - Additional demand on schools and social services.
 - The number 7 and 8 bus has now been reduced to mainly one bus an hour and there is now no evening number 8 service.
 - Additional demand on gas, electric, telephone, water, sewers and surface / storm water drainage.
 - Moving Eldon Way and the Foundry Estate to a green belt site at the airport area will increase mileage for employees and the lack of public transport will limit employment to car users. We believe cycling would be a poor and unrealistic substitute.
 - ECC have stated that the B1013 is now running at 72% capacity. The Core Strategy proposal would bring the traffic to an unbearable level. No details and estimated costs are given of the many road improvement we believe would be necessary as listed below.
 - This area is enclosed by the River Crouch, the sea and the Thames and is only properly accessed from the west. For this reason we believe the sensible place to locate additional homes would be in the western part of Rochford district.
 - We believe that no major infrastructure improvements have been carried out in the Hawkwell area for more than 30 years. We also believe that the following infrastructure improvements in the Hawkwell / Hockley area, that are not included in the Core Strategy document, should be addressed before any additional homes are built:
1. Replacement of Rectory Road Railway Bridge for two-way traffic.
 2. Computer controlled traffic lights at the Rectory Road / Hall Road junction.
 3. Upgrade Rectory Road and widen road and footpath at the Christmas Tree Farm area.
 4. Upgrade the B1013 Hall Road and provide missing and upgrade existing pavements.
 5. Proper main road street lighting for the B1013 Hall Road and B1013 Rayleigh Road.
 6. A cycle path route from Rochford through Hockley to Rayleigh.
 7. A new pelican crossing in B1013 Main Road near Tudor Way.
 8. Return to two buses an hour in both directions for the 7 and 8 services between Southend and Rayleigh and the return of the 8 evening bus service.
 9. Improvements to all services including gas, electric, telephone, water, sewers and surface / storm water drainage.
 10. Increase capacity at all the local Schools in the area.
 11. Increase capacity at all the local Doctors and Dentists and hospital services in the area.
 12. Increase ambulance, fire and police emergency services.
 13. Provide and run a youth club in the Hawkwell area.
 14. To provide and run allotments in the Hawkwell area.
 15. To extend the existing Cherry Orchard Park to Mount Bovers Lane and Hockley Woods.
 16. Replace the existing Hockley Spa roundabout with a wider traffic light junction complete with pedestrian cross lights.
 17. Install a double mini roundabout at Station Road and Station Approach junction with Spa Road for Hockley Station.
 18. Install a mini roundabout on the B1013 at Folly Lane.
 19. Make up / Upgrade Plumberow Avenue through to Lower Road in Hockley complete with pavements, main road street lighting and a mini roundabout at the Lower Road junction.
 20. Upgrade Watery Lane / Beeches Road in Hullbridge from Lower Road complete with pavements, main road street lighting and a mini roundabout at the Lower Road junction.

Core Strategy Submission Document

16477 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Summary: I wish to object on the grounds of unsoundness or legally non compliant due to the following points:

- Producing a heavy weight document that prevented printing and general distribution was an unfair method of consultation.
- This document does not fully take into consideration the impact of the JAAP report and the reports for the proposed redevelopment of Hockley, Rochford and Rayleigh.
- The stated government policy of using 60% brown field sites first before green field seems to have been reversed, with many potential sites for building being of a green field nature.
- If the 175 homes were to be located in one place it will change the nature of the village. We believe it would be better to spread them throughout the Hawkwell area. Consideration should be given to the proximity of shops and schools as due to the lack of public transport additional car usage would result.
- That comprehensive consultation has not taken place with ECC, other district councils, local parish / town councils, residents associations and other interested parties in and around our district.
- The additional homes will put an enormous strain on the infrastructure of our area, particularly the road system, which has not been addressed in the document.
- Loss of Green Belt in our area, which would change our village into a town.
- Additional vehicles on the roads from the building of the new homes, the additional residents, their delivery services and visitors and the proposed airport expansion traffic.
- Additional demand on our doctors and dentists.
- Additional demand on schools and social services.
- The number 7 and 8 bus has now been reduced to mainly one bus an hour and there is now no evening number 8 service.
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- ECC have stated that the B1013 is now running at 72% capacity. The Core Strategy proposal would bring the traffic to an unbearable level. No details and estimated costs are given of the many road improvement we believe would be necessary as listed below.
- This area is enclosed by the River Crouch, the sea and the Thames and is only properly accessed from the west. For this reason we believe the sensible place to locate additional homes would be in the western part of Rochford district.
- We believe that no major infrastructure improvements have been carried out in the Hawkwell area for more than 30 years.

Change to Plan We also believe that the following infrastructure improvements in the Hawkwell / Hockley area, that are not included in the Core Strategy document, should be addressed before any additional homes are built:

1. Replacement of Rectory Road Railway Bridge for two-way traffic.
2. Computer controlled traffic lights at the Rectory Road / Hall Road junction.
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10. Increase capacity at all the local Schools in the area.
11. Increase capacity at all the local Doctors and Dentists and hospital services in the area.
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13. Provide and run a youth club in the Hawkwell area.
14. To provide and run allotments in the Hawkwell area.
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17. Install a double mini roundabout at Station Road and Station Approach junction with Spa Road for Hockley Station.
18. Install a mini roundabout on the B1013 at Folly Lane.
19. Make up / Upgrade Plumberow Avenue through to Lower Road in Hockley complete with pavements, main road street lighting and a mini roundabout at the Lower Road junction.
20. Upgrade Watery Lane / Beeches Road in Hullbridge from Lower Road complete with pavements, main road street lighting and a mini roundabout at the Lower Road junction.

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16482 - 8324 - Policy H2 - Extensions to residential envelopes and phasing - i, ii, iii

16482 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr J Needs & Aston Unit Trust [8324]

C/o Sellwood Planning
Stoughton Cross House
Stoughton Cross
Wedmore
Somerset
BS28 4QP

Agent: Sellwood Planning (Mr R M Sellwood) [5054]

Sellwood Planning
Stoughton Cross House
Stoughton Cross
Wedmore
Somerset
BS28 4QP

Full Text:

As explained in other representations submitted on behalf of the Aston Unit Trust and Mr J Needs, the Core Strategy fails to set out a long term, robust and flexible strategy for development as required under PPS12. Policy H2 compounds these concerns by being inflexible and distributing greenfield allocations in a manner which is contrary to the Council's objectives and will not deliver a pattern of sustainable development.

The main deficiencies of Policy H2 are

- (a) there is no reason to split the housing provision between H2 (pre 2021) and Policy H3 (post 2021). The Core Strategy should contain a single allocations policy dealing with the full plan period of at least 15 years. By separating the sites into two periods, there is no clear mechanism to (for example) accelerate H3 sites if there is a shortfall in the H2 sites
- (b) there is no contingency strategy if any of the H2 sites fail to come forward or guidance on what sites should be additionally allocated if other parts of the land supply fail
- (c) the number of dwellings allocated to each settlement in Policy H2 does not represent a distribution which will maximise the chances of achieving a more sustainable pattern of development. In particular, it is unclear why, as the largest town in the District (30,196 people, para 2.21), Rayleigh is allocated no greenfield dwellings prior to 2015, only 500 dwellings between 2015 and 2021 and no dwellings after 2021 (Policy H3). In contrast, Rochford / Ashingdon (population 10,775) is proposed to accommodate 1,200 dwellings during the full plan period (H2 and H3), and Hullbridge (population 6445) has the same allocation as Rayleigh of 500 dwellings, despite being one fifth of its size.

Whilst it is accepted that the size of a settlement does not automatically mean it is the most sustainable settlement for further development, the Core Strategy makes the following factual statements about Rayleigh which suggest it is the most sustainable settlement in the District

- (i) it is the largest settlement in the District (2.21)
- (ii) it has the best access to services in the District (2.68)
- (iii) Rayleigh has the highest percentage of demand (44.4%) in terms of the Housing Waiting List (2.35)
- (iv) Rayleigh provides the most comprehensive range of town centre facilities (12.13)
- (v) Rayleigh is the principal centre in the District and maintains a much greater share of its convenience and comparison shopping than any other area of the District (12.18).

Paragraph 2.39 encapsulates what is (correctly) the distribution strategy for additional housing

"As well as directing housing growth to areas of need / demand, and away from unsustainable locations subject to constraints, the Council must consider the relationship of housing growth to areas of employment growth".

It is difficult to reconcile this comment with (for example) the proposal to identify the same number of greenfield allocations (500 in H2 and H3) in both Rayleigh and Hullbridge. Hullbridge is a second tier settlement and the plan comments on the less sustainable nature of these settlements as follows

"The second tier comprises Hullbridge and Great Wakering. These settlements have a more limited range of services and access to public transport is relatively poor".

It is noted that the first of the 'Transport' objectives (p102) is

"deliver developments that will reduce reliance on the private car, and that are well related to the public transport network".

This is also reflected in Policy T1 which starts by stating

"Developments will be required to be located and designed in such a way as to reduce reliance on the private car".

It therefore appears that the objective of the Core Strategy to deliver the most sustainable pattern of development is not reflected in the proposed greenfield housing distribution in Policies H2 and H3.

The decision not to locate more greenfield development in Rayleigh does not reflect an absence of available and sustainable sites.

For example, the Aston Unit Trust and Mr J Needs have land at Wellington Road, north east of Rayleigh and south of the

Core Strategy Submission Document

O - 16482 - 8324 - Policy H2 - Extensions to residential envelopes and phasing - i, ii, iii

16482 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

B1013

which is capable of accommodating up to 200 dwellings. This land (see plan) is outside the Upper Roach Valley Policy Area and is well located to the wide range of facilities provided in the town. It could, therefore, represent a sustainable eastern extension to the largest town in the District with the highest level of housing need. It is also a location where many trips could be made without requiring the use of a private car.

The logical conclusion of this representation is that the balance of H2 and H3 sites should be adjusted to give a higher level of development in Rayleigh and less in the second and third tier settlements. Rayleigh should also be the priority area of search for additional greenfield allocations if further sites are required. This would accord with the new spatial strategy Policy H*.

The plan could be made sound by amalgamating Policies H2 and H3 into a single policy covering the whole plan period.

"Extensions to residential envelopes to 2025

The residential envelopes of existing settlements will be extended in the broad areas set out below and indicated on the Key Diagram to contribute to land supply in the period to 2025.

Area

Rayleigh North of London Road - 550 Dwellings by 2025
North East Rayleigh, south of the B1013 - 200 Dwellings by 2025
Other sites at Rayleigh - 320 Dwellings by 2025
West Rochford - 600 Dwellings by 2025
West Hockley - 50 Dwellings by 2025
South Hawkwell - 175 Dwellings by 2025
Ashingdon - 400 Dwellings by 2025
Hullbridge - 200 Dwellings by 2025
Great Wakering - 250 Dwellings by 2025
Canewdon - 40 Dwellings by 2025

Total Dwellings by 2025 - 2785

The detailed location and quantum of development will be articulated within the Allocations DPD (rest of policy unchanged)

It is considered that our participation at the oral part of the public examination would assist the Inspector for two main reasons

- Sellwood Planning has a detailed knowledge of the Rochford area, appeared at the last Local Plan Inquiry and was a participant at the RSS public examination. This direct knowledge of the local area and the statutory Development Plan may be of assistance to the Inspector

- Sellwood Planning has experience in promoting major schemes through Core Strategies (eg. 7,000 dwellings in Ashford, 5,750 dwellings in Dover, 2,500 dwellings in Horsham and 1,200 dwellings in Newmarket) and the emerging body of evidence of what constitutes a sound Core Strategy and what is unsound. Our experience indicates that, in a number of respects, the submitted Core Strategy is unsound in its present form.

Summary:

As explained in other representations submitted on behalf of the Aston Unit Trust and Mr J Needs, the Core Strategy fails to set out a long term, robust and flexible strategy for development as required under PPS12. Policy H2 compounds these concerns by being inflexible and distributing greenfield allocations in a manner which is contrary to the Council's objectives and will not deliver a pattern of sustainable development.

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(c) the number of dwellings allocated to each settlement in Policy H2 does not represent a distribution which will maximise the chances of achieving a more sustainable pattern of development. In particular, it is unclear why, as the largest town in the District (30,196 people, para 2.21), Rayleigh is allocated no greenfield dwellings prior to 2015, only 500 dwellings between 2015 and 2021 and no dwellings after 2021 (Policy H3). In contrast, Rochford / Ashingdon (population 10,775) is proposed to accommodate 1,200 dwellings during the full plan period (H2 and H3), and Hullbridge (population 6445) has the same allocation as Rayleigh of 500 dwellings, despite being one fifth of its size.

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Core Strategy Submission Document

O - 16482 - 8324 - Policy H2 - Extensions to residential envelopes and phasing - i, ii, iii

16482 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

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For example, the Aston Unit Trust and Mr J Needs have land at Wellington Road, north east of Rayleigh and south of the B1013

which is capable of accommodating up to 200 dwellings. This land (see plan) is outside the Upper Roach Valley Policy Area and is

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largest town in the District with the highest level of housing need. It is also a location where many trips could be made without requiring the use of a private car.

The logical conclusion of this representation is that the balance of H2 and H3 sites should be adjusted to give a higher level of development in Rayleigh and less in the second and third tier settlements. Rayleigh should also be the priority area of search for additional greenfield allocations if further sites are required. This would accord with the new spatial strategy Policy H*.

Change to Plan The plan could be made sound by amalgamating Policies H2 and H3 into a single policy covering the whole plan period.

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Other sites at Rayleigh - 320 Dwellings by 2025

West Rochford - 600 Dwellings by 2025

West Hockley - 50 Dwellings by 2025

South Hawkwell - 175 Dwellings by 2025

Ashingdon - 400 Dwellings by 2025

Hullbridge - 200 Dwellings by 2025

Great Wakering - 250 Dwellings by 2025

Core Strategy Submission Document

O - 16482 - 8324 - Policy H2 - Extensions to residential envelopes and phasing - i, ii, iii

16482 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Canewdon - 40 Dwellings by 2025

Total Dwellings by 2025 - 2785

The detailed location and quantum of development will be articulated within the Allocations DPD (rest of policy unchanged)

Appear at exam? Yes

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 16499 - 14222 - Policy H2 - Extensions to residential envelopes and phasing - i

16499 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr and Mrs B P McGee [14222]

9 Woodside Chase
Hawkwell
Hockley
Essex
SS5 4BN

Agent: N/A

Full Text: REF: Rochford Core Strategy - 175 Houses in Hawkwell

I feel I must write to you objecting to the above number of houses in Hawkwell West as being unsound. This location is not sustainable in that it will cause an increase in car usage to a point of heavy congestion. At present it takes me quite a while to drive onto the B1013 whether turning right to head for Southend or left towards Hockley and Rayleigh.

The development is situated between Hockley and Rochford railway stations and necessitates the use of a car to reach either of these locations. There is limited public transport in this area and I cannot see any improvement in the near future. A similar reasoning exists for the shops which can only be accessed by car.

Unless the highways can be improved in the area mentioned we can only look forward to gridlock in this region.

I feel that the requirements of PPS12 are not being met in the manner they are intended. From an environmental point of view this development creates a loss of character and I cannot see any social, economic or environmental benefits for the existing settlements.

Summary: REF: Rochford Core Strategy - 175 Houses in Hawkwell

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Unless the highways can be improved in the area mentioned we can only look forward to gridlock in this region.

I feel that the requirements of PPS12 are not being met in the manner they are intended. From an environmental point of view this development creates a loss of character and I cannot see any social, economic or environmental benefits for the existing settlements.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16500 - 14223 - Policy H2 - Extensions to residential envelopes and phasing - i

16500 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mrs E D Smith and Mr A R Elkes [14223]

22 Park Gardens
Hawkwell
Essex
SS5 4HE

Agent: N/A

Full Text: Objection to Rochford Core Strategy 175 Houses in Hawkwell is Unsound
Attention Mr Shaun Scrutton

Planning Dept

We, the undersigned are writing to register our most urgent protest to the proposed building development of three storey flats on the Hawkwell Christmas tree farm off Rectory Road.

Please consider the colossal effect on the whole village of Hawkwell, environmentally infrastructure, traffic congestion and overall appearance of the countryside.

We trust all protests received by yourself will be taken into account when making your decision.

Summary: Objection to Rochford Core Strategy 175 Houses in Hawkwell is Unsound

We, the undersigned are writing to register our most urgent protest to the proposed building development of three storey flats on the Hawkwell Christmas tree farm off Rectory Road.

Please consider the colossal effect on the whole village of Hawkwell, environmentally infrastructure, traffic congestion and overall appearance of the countryside.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16501 - 9788 - Policy H2 - Extensions to residential envelopes and phasing - i

16501 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: A J & B P Springall [9788]

216 Rectory Road
Hawkwell
Hockley
Essex
SS5 4LG

Agent: N/A

Full Text: Objection to Rochford ore Strategy for 175 Houses in Hawkwell is Unsound for the following reasons
Semi rural location unsuitable for large development. Complete loss of character. Loss of green belt. Loss of wild life. No social, economic or environmental benefits whatsoever.

Summary: Objection to Rochford ore Strategy for 175 Houses in Hawkwell is Unsound for the following reasons

Semi rural location unsuitable for large development. Complete loss of character. Loss of green belt. Loss of wild life. No social, economic or environmental benefits whatsoever.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16521 - 10081 - Policy H2 - Extensions to residential envelopes and phasing - i

16521 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr David Sullivan [10081]

123 Burges Road
Thrope Bay

SS1 3JL

Agent: Whirledge & Nott (Ms K Jennings) [5094]

Whirledge & Nott
The Black Barn
Lubards Lodge Farm
Hullbridge Road
Rayleigh
Essex

SS6 9QG

Full Text: We are not supportive that Land South of London Road has not been included in the potential development areas. Development west of Rayleigh is identified however it does not suggest the inclusion of land South of London Road.

Land South of London Road should be highlighted as a potential area for housing development in Policy H2. This area can be extended to provide a quantity of housing which links into the new development and facilities North of London Road as proposed.

No, I do not wish to participate at the oral examination

Summary: We are not supportive that Land South of London Road has not been included in the potential development areas. Development west of Rayleigh is identified however it does not suggest the inclusion of land South of London Road.

Change to Plan Land South of London Road should be highlighted as a potential area for housing development in Policy H2. This area can be extended to provide a quantity of housing which links into the new development and facilities North of London Road as proposed.

Appear at exam? No

Soundness Tests i

Core Strategy Submission Document

O - 16522 - 10081 - Policy H2 - Extensions to residential envelopes and phasing - i

16522 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr David Sullivan [10081]

123 Burges Road
Thrope Bay

SS1 3JL

Agent: Whirledge & Nott (Ms K Jennings) [5094]

Whirledge & Nott
The Black Barn
Lubards Lodge Farm
Hullbridge Road
Rayleigh
Essex

SS6 9QG

Full Text: We are not supportive that Land North of Rawreth Lane has not been included in the potential development areas. Development west of Rayleigh is identified however it does not suggest the inclusion of land North of Rawreth Lane.

Land North of Rawreth Lane should be highlighted as a potential area for housing development in Policy H2. This area can be extended to provide a quantity of housing which links into the new development and facilities south of Rawreth Lane.

No, I do not wish to participate at the oral examination

Summary: We are not supportive that Land North of Rawreth Lane has not been included in the potential development areas. Development west of Rayleigh is identified however it does not suggest the inclusion of land North of Rawreth Lane.

Change to Plan Land North of Rawreth Lane should be highlighted as a potential area for housing development in Policy H2. This area can be extended to provide a quantity of housing which links into the new development and facilities south of Rawreth Lane.

Appear at exam? No

Soundness Tests i

Core Strategy Submission Document

16559 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Ms S Funk [14225]

8 Hazelwood
Hawkwell
Essex
SS5 4HP

Agent: N/A

Full Text: Objection to Rochford Core Strategy, 175 houses in Hawkwell is UNSOUND

The proposal in the Rochford Core Strategy for this many houses in the Ward of Hawkwell West is UNSOUND because the vital requirements of PPS12 are not met in terms of sustainability and therefore the location of Hawkwell West should be removed.

The reasons why development in this location is unsustainable are as follows:

Travel

Limited public transport - to take just two examples - there is a bus to Southend at 8.03am and the next one isn't until 9.24am - when I used it recently it didn't turn up (apparently a frequent occurrence). The No. 8 bus does not meet the public needs due to infrequent service, unreliability and does not offer an evening service. Not all buses go into Rayleigh - people will have to change their bus at Hockley and catch a train or another bus. This will mean people have no choice but to use their cars leading to...

Increased car use causing heavy congestion as all transport from this development will enter the B130 at Thorpe Road or from Rectory Road. Already the B130 is recognised as the busiest B road in the UK. An increase in traffic will result in a safety issue with emergency vehicles unable to gain access as roads are narrow in places, particularly Rectory Road.

Inability to improve the highways adequately within Hawkwell West now or in the future does not make this development sustainable.

Distance from shops. From Rectory Road to reach the small parade of shops on Main Road is a 20 minute walk with an incline, 30 minutes to Hockley which one has to walk up White Hart Hill, 30 minutes plus to Golden Cross parade of shops. Impossibility for many elderly people or parents with very young children.

Distance from Rail Stations - Hockley is a 30 minute walk from Rectory Road uphill and 50 minutes to Rochford, impractical for many people.

Environment

The site of the planning application is unsuitable for a large development.

Complete loss of character. To place 330 or even 175 properties in the area will be detrimental to the character of Hawkwell West. At the moment Hawkwell West viewed by air or even by google earth shows quite clearly this area to be a hamlet of existing properties, green belt areas with trees and shrubs, surrounded by agriculture fields. To squeeze this development into this space which is green belt with numerous trees and shrubs will make Hawkwell West into suburbia, it will lose its village, semi rural outlook which is important to local residents.

Part of the site, 9 acres already has a tree preservation order granted when local residents asked RDC woodlands officer to intervene when the owner in recent times started to remove trees. Does this not merit the importance of the character of the area that RDC woodland officer thought part of the site was worth of a tree preservation order and thus retaining the character of the area? Why is this now being dismissed?

Loss of green belt land. We cannot afford to lose green belt and anywhere in Hawkwell West.

Loss of wildlife. In Spencer's Park you can see all bird species that live and nest in the proposed site, I regularly see wood pigeons, woodpeckers, jays, together with many of our loved songbirds. Badgers and bats are known to live on the site, is it of no consolation to the wildlife that the proposed site developer has taken this into account and left a small park area protecting the wildlife, an area surrounded by properties and human activity. How can wildlife be protected during the noisy building process, simply the cannot.

In addition the Core Strategy is UNSOUND because it does not fulfil the principals that are stated in the document as it relates to the proposal for Hawkwell West. The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of the existing settlements in Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely effected', this limit has already been exceeded in Hawkwell West.

Core Strategy Submission Document

16559 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

The core strategy says 'locate development in areas where alternatives to car use are more viable' and 'reduce the requirement to travel' and accompanying any development with requisite highway infrastructure to 'mitigate their impact on existing network'. It is not possible to do this in Hawkwell West as there is not room for development of highways, especially in Rectory Road and any developing in this area would increase the requirement to travel, especially by car.

Moving onto Public Transport it states that. There is just one bus to and from Southend/Rayleigh running hourly but does not offer an evening service, with no prospect of Arriva providing an appropriate service in the long term.

Finally, such a large scale development would lead to an unwelcome strip coalescence of built settlements which is not in line with Council policy.

Therefore for all the reasons given in this letter, I most strongly object to the two proposals outlined at the start of this letter.

Summary:

The reasons why development in this location is unsustainable are as follows:

Travel

Limited public transport - to take just two examples - there is a bus to Southend at 8.03am and the next one isn't until 9.24am - when I used it recently it didn't turn up (apparently a frequent occurrence). The No. 8 bus does not meet the public's needs due to infrequent service, unreliability and does not offer an evening service. Not all buses go into Rayleigh - people will have to change their bus at Hockley and catch a train or another bus. This will mean people have no choice but to use their cars leading to...

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Inability to improve the highways adequately within Hawkwell West now or in the future does not make this development sustainable.

Distance from shops. From Rectory Road to reach the small parade of shops on Main Road is a 20 minute walk with an incline, 30 minutes to Hockley which one has to walk up White Hart Hill, 30 minutes plus to Golden Cross parade of shops. Impossibility for many elderly people or parents with very young children.

Distance from Rail Stations - Hockley is a 30 minute walk from Rectory Road uphill and 50 minutes to Rochford, impractical for many people.

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The site of the planning application is unsuitable for a large development.

Complete loss of character. To place 330 or even 175 properties in the area will be detrimental to the character of Hawkwell West. At the moment Hawkwell West viewed by air or even by google earth shows quite clearly this area to be a hamlet of existing properties, green belt areas with trees and shrubs, surrounded by agriculture fields. To squeeze this development into this space which is green belt with numerous trees and shrubs will make Hawkwell West into suburbia, it will lose its village, semi rural outlook which is important to local residents.

Part of the site, 9 acres already has a tree preservation order granted when local residents asked RDC woodlands officer to intervene when the owner in recent times started to remove trees. Does this not merit the importance of the character of the area that RDC woodland officer thought part of the site was worth of a tree preservation order and thus retaining the character of the area? Why is this now being dismissed?

Loss of green belt land. We cannot afford to lose green belt and anywhere in Hawkwell West.

Loss of wildlife. In Spencer's Park you can see all bird species that live and nest in the proposed site, I regularly see wood pigeons, woodpeckers, jays, together with many of our loved songbirds. Badgers and bats are known to live on the site, is it of no consolation to the wildlife that the proposed site developer has taken this into account and left a small park area protecting the wildlife, an area surrounded by properties and human activity. How can wildlife be protected during the noisy building process, simply the cannot.

In addition the Core Strategy is UNSOUND because it does not fulfil the principals that are stated in the document as it relates to the proposal for Hawkwell West. The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of the existing settlements in Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely effected', this limit has already been exceeded in Hawkwell West.

Core Strategy Submission Document

O - 16559 - 14225 - Policy H2 - Extensions to residential envelopes and phasing - iii

16559 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

The core strategy says 'locate development in areas where alternatives to car use are more viable' and 'reduce the requirement to travel' and accompanying any development with requisite highway infrastructure to 'mitigate their impact on existing network'. It is not possible to do this in Hawkwell West as there is not room for development of highways, especially in rectory Road and any developing in this area would increase the requirement to travel, especially by car.

Moving onto Public Transport it states that. There is just one bus to and from Southend/Rayleigh running hourly but does not offer an evening service, with no prospect of Arriva providing an appropriate service in the long term.

Finally, such a large scale development would lead to an unwelcome strip coalescence of built settlements which is not in line with Council policy.

Change to Plan the location of Hawkwell West should be removed

Appear at exam? Not Specified **Soundness Tests** iii

Core Strategy Submission Document

O - 16568 - 11668 - Policy H2 - Extensions to residential envelopes and phasing - i, ii

16568 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Miss Amanda Colgate [11668]

132 Downhall Park Way
Rayleigh
Essex
SS6 9TP
United Kingdom
01268781799

Agent: N/A

Full Text: I am opposed to the proposals for 550 houses on Rawreth Lane farmland for the following reasons.

1. It is against the green belt principle of safeguarding the countryside from encroachment.
2. Once green belt has started to be used there is no stopping point.
3. The buffer between villages/towns will be eroded and destroy the rural character of Rawreth.
4. Building on outer edges does not encourage any sense of community.
5. Lack of current demand in this area.
6. Large area of proposed development area already defined as a 4th Tier settlement.
7. Roads are already full to capacity.
8. Increased flood risk.

Use all available land within the existing boundaries and do not sprawl onto protected green belt.

Summary:

I am opposed to the proposals for 550 houses on Rawreth Lane farmland for the following reasons.

1. It is against the green belt principle of safeguarding the countryside from encroachment.
2. Once green belt has started to be used there is no stopping point.
3. The buffer between villages/towns will be eroded and destroy the rural character of Rawreth.
4. Building on outer edges does not encourage any sense of community.
5. Lack of current demand in this area.
6. Large area of proposed development area already defined as a 4th Tier settlement.
7. Roads are already full to capacity.
8. Increased flood risk.

Change to Plan Use all available land within the existing boundaries and do not sprawl onto protected green belt.

Appear at exam? No **Soundness Tests** i, ii

Core Strategy Submission Document

O - 16569 - 14227 - Policy H2 - Extensions to residential envelopes and phasing - i, ii

16569 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr S Herbert [14227]

132 Downhall Park Way
Rayleigh
Essex
SS6 9TP
01268 781799

Agent: N/A

Full Text: I oppose the building plans for additional houses in Rawreth Lane farmland because

1. It is against the green belt principle
2. Once erosion of green belt starts it will not stop.
3. The buffer between villages/towns will be eroded and destroy the rural character of Rawreth.
4. Building on outer edges does not encourage any sense of community.
5. Lack of current demand in this area.
6. Large area of proposed development area already defined as a 4th Tier settlement.
7. Roads are already full to capacity.
8. Increased flood risk.

Use all available land within the existing boundaries and leave the green belt alone.

Summary: I oppose the building plans for additional houses in Rawreth Lane farmland because

1. It is against the green belt principle
2. Once erosion of green belt starts it will not stop.
3. The buffer between villages/towns will be eroded and destroy the rural character of Rawreth.
4. Building on outer edges does not encourage any sense of community.
5. Lack of current demand in this area.
6. Large area of proposed development area already defined as a 4th Tier settlement.
7. Roads are already full to capacity.
8. Increased flood risk.

Change to Plan Use all available land within the existing boundaries and leave the green belt alone.

Appear at exam? No

Soundness Tests i, ii

Core Strategy Submission Document

O - 16570 - 8568 - Policy H2 - Extensions to residential envelopes and phasing - i, iii

16570 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr P W Tarrant & Ms J L Haxell [8568]

Agent: N/A

5 Briar Close
Hawkwell
Hockley
Essex
SS5 4HD

Full Text: Objection to Rochford Core Strategy, 175 Houses in Hawkwell

Dear Mr Scrutton,

The proposal in the Rochford Core Strategy for this many houses in the Ward of Hawkwell is unsound since the requirements of PPS12 are not met in terms of sustainability. Therefore the location of Hawkwell West should be removed by the Inspector, and the allocation moved to a sustainable location.

The reasons that development in this location is unsustainable under PPS12 are as follows:

Travel

- â€¢ Limited public transport
- â€¢ Increased car use causing heavy congestion
- â€¢ Inability to improve highways
- â€¢ Distance from shops
- â€¢ Distance from rail stations

Environment

- â€¢ Semi-rural location is unsuitable for large development
- â€¢ Complete loss of character
- â€¢ Loss of Green Belt
- â€¢ Loss of wildlife
- â€¢ No social, economic or environmental benefits

In addition, the Core Strategy is unsound as it does not fulfil the principles that are expressly stated in the Core Strategy as it relates to the proposal for Hawkwell:

The Core Strategy states that it 'seeks to take advantage of development Opportunities that will provide social, economic and environmental Benefits'

No such benefits can apply to this location, in fact development would be detrimental to the character of the existing settlement in Hawkwell West (in contradiction of the stated aims of the Core Strategy), The Core Strategy also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. 175 new houses in West Hawkwell will far exceed this limit.

The Core Strategy says 'locate development in areas where alternatives to car use are more viable'; 'reduce the requirement to travel', and accompany any development with requisite highway infrastructure to 'mitigate their impact on the existing network'. It is not possible to do this in Hawkwell West as there is no space for the development of local roads, particularly in Rectory Road, and any development here would increase the requirement to travel, especially by car.

In respect of Public Transport, the Core Strategy states that 'planning should be well related to existing public transport'. There is just one bus to and from Southend/Rayleigh per hour, with no prospect of Arriva providing and appropriate service in the long term.

Finally, such a large scale development would lead to an unwelcome strip coalescence of built settlements which is not in line with Council policy.

We sincerely hope that Rochford District Council considers these matters very carefully, and concludes, with many residents of Hawkwell, that this housing development is unsustainable.

Summary: The reasons that development in this location is unsustainable under PPS12 are as follows:

Travel

- â€¢ Limited public transport
- â€¢ Increased car use causing heavy congestion
- â€¢ Inability to improve highways
- â€¢ Distance from shops
- â€¢ Distance from rail stations

Core Strategy Submission Document

16570 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Environment

- â€¢ Semi-rural location is unsuitable for large development
- â€¢ Complete loss of character
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In addition, the Core Strategy is unsound as it does not fulfil the principles that are expressly stated in the Core Strategy as it relates to the proposal for Hawkwell:

The Core Strategy states that it 'seeks to take advantage of development Opportunities that will provide social, economic and environmental Benefits'

No such benefits can apply to this location, in fact development would be detrimental to the character of the existing settlement in Hawkwell West (in contradiction of the stated aims of the Core Strategy), The Core Strategy also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. 175 new houses in West Hawkwell will far exceed this limit.

The Core Strategy says 'locate development in areas where alternatives to car use are more viable'; 'reduce the requirement to travel', and accompany any development with requisite highway infrastructure to 'mitigate their impact on the existing network'. It is not possible to do this in Hawkwell West as there is no space for the development of local roads, particularly in Rectory Road, and any development here would increase the requirement to travel, especially by car.

In respect of Public Transport, the Core Strategy states that 'planning should be well related to existing public transport'. There is just one bus to and from Southend/Rayleigh per hour, with no prospect of Arriva providing and appropriate service in the long term.

Finally, such a large scale development would lead to an unwelcome strip coalescence of built settlements which is not in line with Council policy.

We sincerely hope that Rochford District Council considers these matters very carefully, and concludes, with many residents of Hawkwell, that this housing development is unsustainable.

Change to Plan the location of Hawkwell West should be removed by the Inspector, and the allocation moved to a sustainable location.

Appear at exam? Not Specified **Soundness Tests** i, iii

Core Strategy Submission Document

O - 16571 - 7865 - Policy H2 - Extensions to residential envelopes and phasing - i, iii

16571 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mrs Patricia James [7865]

8 Hazelwood
Hawkwell
Essex
SS5 4HP

Agent: N/A

Full Text: Objection to Rochford Core Strategy, 175 houses in Hawkwell is UNSOUND

As a resident in Hawkwell West together with my family who for the past four generations have also resided in the area enables me to have an in-depth knowledge of the local area and its inhabitants.

Hawkwell West during my lifetime has seen only small scale property development, the largest possibly my own road Hazelwood with 26 houses. Clements Hall Sports Centre was built which together with properties known as Royers and Spencer's, the 'offering' or bargaining between land owners and RDC of 'let me build here and you can have some land for public open space' which gave the area Spencers Park together with the adjacent development. Apart from this Hawkwell West has only seen small developments or small scale infilling a few properties at a time mostly when a property with large garden is demolished and two or three properties built in the place of one. Although I may not always approve of backyard development or intensified infilling we have not seen an application for a proposed development such as envisaged by David Wilson Homes for Hawkwell West of 330 properties or even that has been proposed in the Rochford Core Strategy of 127 properties.

One the building of Clements Hall Sports Centre, the access road was originally planned for Sweyne Avenue, local residents objected and the plan was put forward that a new access road should be built, now called Clements Hall Way. A public inquiry was held at Rayleigh, it was decided by the Inspector that 'she would only allow the access road on the condition that it would form a barrier to prevent any further encroachment of green belt land between the existing remaining properties (one was removed to make space for the road) to the East along Rectory Road and to the West along Rectory Road to Main Road Hawkwell'.

The Inspector saw the importance of retaining the green belt land (now the proposed site for development) and the character of the area when she granted permission for the road but with safeguards in place to protect the green belt. The same should still apply today. Why is the Inspectors decision now being dismissed and ignored by RDC? This is the same area that David Wilson Homes envisages 300 properties and has applied to RDC for outline planning permission and I suspect will be the suggested site for Hawkwell West RDC within the Core Strategy for 127 properties.

The proposal in the Rochford Core Strategy for this many houses in the Ward of Hawkwell West is UNSOUND because the vital requirements of PPS12 are not met in terms of sustainability and therefore the location of Hawkwell West should be removed.

The reasons why development in this location is unsustainable are as follows:

Travel

Limited public transport, one bus an hour that does not meet the publics needs due to infrequent service, unreliability and does not offer an evening service.

Increased car use causing heavy congestion as all transport from this development will enter the B130 at Thorpe Road or from Rectory Road. Already the B130 is recognised as the busiest B road in the UK. All access roads leading onto the B130 can be seen now with cars stacking to enter at every road junction and mini roundabouts en route at most times of the day and particularly at rush hours. One accident between Rochford, Hawkwell and Hockley causes gridlock, an increase in traffic will result in a safety issue with emergency vehicles unable to gain access as roads are narrow in places, particularly Rectory Road. The planning application suggests two access points onto Rectory Road and Thorpe Road onto Main Road - all converge onto the B130 a B road at the capacity already of an A road making this an unrealistic proposal with no possibility of improvement other than what has been suggested at the mini-roundabout junction of Rectory Road, Hall Road, Main Road B130. This is an inadequate improvement to solve an excess traffic problem.

Inability to improve the highways adequately within Hawkwell West now or in the future does not make this development sustainable.

Distance from shops. From Rectory Road to reach the small parade of shops on Main Road is a 20 minute walk with an incline, 30 minutes to Hockley which one has to walk up White Hart Hill, 30 minutes plus to Golden Cross parade of shops. Impossibility for many elderly people or parents with very young children with shopping too.

Distance from Rail Stations - Walking Hockley 30 minutes from Rectory Road uphill and 50 minutes to Rochford, impractical for many people without their own transport and an unreliable bus service. Cycling may not be a choice for all or even convenient for the majority.

Core Strategy Submission Document

16571 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Environment

The site of the planning application is unsuitable for a large development as it sits in the middle of a semi rural location near agriculture land, green belt areas with limited existing properties, mostly bungalows and detached properties. The application suggests 'landmark buildings' three stories high amongst detached and semi detached properties, completely out of keeping with the area..

Complete loss of character. To place 330 or even 175 properties in the area will be detrimental to the character of Hawkwell West. At the moment Hawkwell West viewed by air or even by google earth shows quite clearly this area to be a hamlet of existing properties, green belt areas with trees and shrubs, surrounded by agriculture fields. To squeeze this development into this space which is green belt with numerous trees and shrubs will make Hawkwell West into suburbia, it will lose its village, semi rural outlook which is important to local residents.

Part of the site, 9 acres already has a tree preservation order granted when local residents asked RDC woodlands officer to intervene when the owner in recent times started to remove trees. Does this not merit the importance of the character of the area that RDC woodland officer thought part of the site was worth of a tree preservation order and thus retaining the character of the area? Why is this now being dismissed?

Loss of green belt land. We cannot afford to lose green belt and anywhere in Hawkwell West.

In addition there will be far too much green belt land lost if developments go ahead in neighbouring villages which will impact on our area too. I would like to preserve the little we have in Hawkwell West for future generations to enjoy, not for them to wish that we had not been more sensitive to the local environment by allowing such developments to go ahead.

Loss of wildlife. From my address you will be aware that I live on the north side of Spencer's Park, a park that at the moment is enjoyed by all bird species that live and nest in the proposed site, I regularly see wood pigeons, woodpeckers, jays, together with many of our loved songbirds. Badgers and bats are known to live on the site, is it of no consolation to the wildlife that the proposed site developer has taken this into account and left a small park area protecting the wildlife, an area surrounded by properties and human activity. How can wildlife be protected during the noisy building process, simply the cannot.

There are NO social, economical or environmental benefits to be gained with this development of 330 houses and in addition the Core Strategy is UNSOUND because it does not fulfil the principals that are stated in the document as it relates to the proposal for Hawkwell West. The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of the existing settlements in Hawkwell West.

It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely effected', this limit has already been exceeded in Hawkwell West.

The core strategy says 'locate development in areas where alternatives to car use are more viable' and 'reduce the requirement to travel' and accompanying any development with requisite highway infrastructure to 'mitigate their impact on existing network'. It is not possible to do this in Hawkwell West as there is not room for development of highways, especially in Rectory Road and any developing in this area would increase the requirement to travel, especially by car.

Moving onto Public Transport it states that 'planning should be well related to existing public transport where possible'.. There is just one bus to and from Southend/Rayleigh running hourly but does not offer an evening service, with no prospect of Arriva providing an appropriate service in the long term.

Finally, such a large scale development would lead to an unwelcome strip coalescence of built settlements which is not in line with Council policy.

Therefore for all the reasons given in this letter, I most strongly object to the two proposals outlined at the start of this letter.

Summary:

The proposal in the Rochford Core Strategy for this many houses in the Ward of Hawkwell West is UNSOUND because the vital requirements of PPS12 are not met in terms of sustainability and therefore the location of Hawkwell West should be removed.

The reasons why development in this location is unsustainable are as follows:

Travel

Limited public transport, one bus an hour that does not meet the public's needs due to infrequent service, unreliability and does not offer an evening service.

Increased car use causing heavy congestion as all transport from this development will enter the B130 at Thorpe Road or from Rectory Road. Already the B130 is recognised as the busiest B road in the UK. All access roads leading onto

Core Strategy Submission Document

O - 16571 - 7865 - Policy H2 - Extensions to residential envelopes and phasing - i, iii

16571 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

the B130 can be seen now with cars stacking to enter at every road junction and mini roundabouts en route at most times of the day and particularly at rush hours. One accident between Rochford, Hawkwell and Hockley causes gridlock, an increase in traffic will result in a safety issue with emergency vehicles unable to gain access as roads are narrow in places, particularly Rectory Road. The planning application suggests two access points onto Rectory Road and Thorpe Road onto Main Road - all converge onto the B130 a B road at the capacity already of an A road making this an unrealistic proposal with no possibility of improvement other than what has been suggested at the mini-roundabout junction of Rectory Road, Hall Road, Main Road B130. This is an inadequate improvement to solve an excess traffic problem.

Inability to improve the highways adequately within Hawkwell West now or in the future does not make this development sustainable.

Distance from shops. From Rectory Road to reach the small parade of shops on Main Road is a 20 minute walk with an incline, 30 minutes to Hockley which one has to walk up White Hart Hill, 30 minutes plus to Golden Cross parade of shops. Impossibility for many elderly people or parents with very young children with shopping too.

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Environment

The site of the planning application is unsuitable for a large development as it sits in the middle of a semi rural location near agriculture land, green belt areas with limited existing properties, mostly bungalows and detached properties. The application suggests 'landmark buildings' three stories high amongst detached and semi detached properties, completely out of keeping with the area..

Complete loss of character. To place 330 or even 175 properties in the area will be detrimental to the character of Hawkwell West. At the moment Hawkwell West viewed by air or even by google earth shows quite clearly this area to be a hamlet of existing properties, green belt areas with trees and shrubs, surrounded by agriculture fields. To squeeze this development into this space which is green belt with numerous trees and shrubs will make Hawkwell West into suburbia, it will lose its village, semi rural outlook which is important to local residents.

Part of the site, 9 acres already has a tree preservation order granted when local residents asked RDC woodlands officer to intervene when the owner in recent times started to remove trees. Does this not merit the importance of the character of the area that RDC woodland officer thought part of the site was worth of a tree preservation order and thus retaining the character of the area? Why is this now being dismissed?

Loss of green belt land. We cannot afford to loose green belt and anywhere in Hawkwell West.

In addition there will be far too much green belt land lost if developments go ahead in neighbouring villages which will impact on our area too. I would like to preserve the little we have in Hawkwell West for future generations to enjoy, not for them to wish that we had not been more sensitive to the local environment by allowing such developments to go ahead.

Loss of wildlife. From my address you will be aware that I live on the north side of Spencer's Park, a park that at the moment is enjoyed by all bird species that live and nest in the proposed site, I regularly see wood pigeons, woodpeckers, jays, together with many of our loved songbirds. Badgers and bats are known to live on the site, is it of no consolation to the wildlife that the proposed site developer has taken this into account and left a small park area protecting the wildlife, an area surrounded by properties and human activity. How can wildlife be protected during the noisy building process, simply the cannot.

There are NO social, economical or environmental benefits to be gained with this development of 330 houses and in addition the Core Strategy is UNSOUND because it does not fulfil the principals that are stated in the document as it relates to the proposal for Hawkwell West. The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of the existing settlements in Hawkwell West.

It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely effected', this limit has already been exceeded in Hawkwell West.

The core strategy says 'locate development in areas where alternatives to car use are more viable' and 'reduce the requirement to travel' and accompanying any development with requisite highway infrastructure to 'mitigate their impact on existing network'. It is not possible to do this in Hawkwell West as there is not room for development of highways, especially in rectory Road and any developing in this area would increase the requirement to travel, especially by car.

Moving onto Public Transport it states that 'planning should be well related to existing public transport where possible'.. There is just one bus to and from Southend/Rayleigh running hourly but does not offer an evening service, with no

Core Strategy Submission Document

O - 16571 - 7865 - Policy H2 - Extensions to residential envelopes and phasing - i, iii

16571 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

prospect of Arriva providing an appropriate service in the long term.

Finally, such a large scale development would lead to an unwelcome strip coalescence of built settlements which is not in line with Council policy.

Change to Plan the location of Hawkwell West should be removed.

Appear at exam? Not Specified **Soundness Tests** i, iii

Core Strategy Submission Document

O - 16573 - 14230 - Policy H2 - Extensions to residential envelopes and phasing - i

16573 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr and Mrs Edwards [14230]

29 Spencers
Hawkwell
Hockley
Essex
SS5 4LW

Agent: N/A

Full Text: Objection to Rochford Core Strategy - 175 Houses in Hawkwell is UNSOUND.

We are writing formally to express our strong objection to the Rochford Core Strategy concerning 175 houses in Hawkwell as UNSOUND.

In brief our objections are based on the following:

The proposed site is on greenbelt/woodland and will impact on wildlife in the area as well as climate change. A large and highly concentrated housing development is totally out of character with the "open" and semi-rural nature of the area.

The proposals to build a significant number of houses close together including flats and three storey properties would not be in keeping with properties in Hawkwell which are primarily detached or semi detached bungalows or houses. The local transport or highways will not be able to support the significant increase in demand_ particularly commuting and local car journeys arising from 330 houses in such a concentrated area. The B1013 is already one of the busiest roads in this part of Essex.

Local bus services are very infrequent and almost non-existent in the late evenings.

Apart from the increase in demand for local doctor and dentist services, local schools are unlikely to be able to accommodate the significant increase in demand for school places.

Overall, we firmly believe that these proposals will adversely affect the social, economic and environmental nature of the area, and we therefore strongly object to Council Members approving this part of the Rochford Core Strategy application.

Summary: We are writing formally to express our strong objection to the Rochford Core Strategy concerning 175 houses in Hawkwell as UNSOUND.

In brief our objections are based on the following:

The proposed site is on greenbelt/woodland and will impact on wildlife in the area as well as climate change. A large and highly concentrated housing development is totally out of character with the "open" and semi-rural nature of the area.

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Overall, we firmly believe that these proposals will adversely affect the social, economic and environmental nature of the area, and we therefore strongly object to Council Members approving this part of the Rochford Core Strategy application.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16611 - 5219 - Policy H2 - Extensions to residential envelopes and phasing - i, ii

16611 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Fairview New Homes Ltd [5219]

Fairview New Homes Ltd
50 Lancaster Road
Enfield
Middlesex
EN2 0BY
020 83661271

Agent: Planning Potential (Miss G Brickwood) [7549]

Planning Potential
Palace House
3 Cathedral Street
London
SE1 9DE
0207 357 8000

Full Text: Representations on behalf of Fairview New Homes

1. We are instructed by our client, Fairview New Homes, to submit comments on the published Core Strategy Submission Document. For ease specific reference has been made in accordance with the paragraph and policy numbers as contained in the published document. We would like the opportunity to represent our Client at the forthcoming Examination of the Core Strategy DPD and would be grateful for confirmation that this is possible.

2. Fairview New Homes have an interest in a parcel of land to the South West of Rayleigh Town Centre, as indicated on the attached site location plan. This land was previously identified in the Core Strategy Preferred Options documents to provide an urban extension to the south west of Rayleigh. This option has now been withdrawn in the Core Strategy Submission document and it is on this basis these representations are provided to the Council.

3. The Submission Core Strategy has been considered against the requirements set out at Paragraph 4.36 of PPS12 requiring core strategies to be justifiable and effective in order to be found sound, as follows:

Justified:

- i. Founded on a robust and credible evidence base
- ii. The most appropriate strategy when considered against the reasonable alternatives

Effective:

- i. Deliverable - the Core Strategy should show how the vision, objectives and strategy for the area will be delivered and by whom, and when, including who is responsible for implementing different elements of the strategy and when
- ii. Flexible - a strategy is unlikely to be effective if it cannot deal with changing circumstances. Plans should show how they will handle contingencies.
- iii. Able to be monitored - monitoring is essential for an effective strategy and will provide the basis on which the contingency plans within the strategy would be triggered.

4. To summarise our comments, Fairview New Homes strongly object to the Core Strategy as is currently presented on the basis the document is currently unsound for a number of reasons:

â€¢ The lack of robust and credible evidence base

â€¢ Failure to clearly discount reasonable alternatives

â€¢ The effectiveness of the plan is also considered to be flawed and the Council's approach to deliverability and flexibility is questioned.

5. Fundamentally, we question the soundness of the Core Strategy due to the lack of available evidence to support the choices made by the Council. In particular, there is a strong reliance on the findings of the 2009 Strategic Housing Land Availability Assessment (SHLAA) although it is understood this document is not due to be published for consideration alongside the Core Strategy. We, therefore, reserve the right to submit additional comments to the Core Strategy consultation following the publication of the SHLAA.

6. The 2009 SHLAA is clearly listed at Paragraph 1.29 of the submission Core Strategy as one of the evidence base documents the Council have drawn upon when drafting the Core Strategy. The documents listed are all considered to have played an important role in informing the Core Strategy. PPS12 also recognises at Paragraph 4.37 the importance of demonstrating how choices made in the plan are backed up by factual evidence identified in evidence base documents.

7. As a starting point it is important to state it is Fairview New Homes greatest concern there is no background provided within the Core Strategy document, or indeed any of the available evidence base documents, identifying why the Local Planning Authority has chosen to remove some of the sites previously proposed for housing development. In addition, there is also no justification as to why the retained urban extension sites are more suitable than those removed from the draft plan.

8. The following provides specific comments in response to the relevant areas of the Core Strategy.

Housing

9. It is stated at Paragraphs 4.10-4.12 that the Council have adopted a balanced approach when locating new housing between higher tier settlements and lower tier settlements. Although there is no detail provided as to how the Council

Core Strategy Submission Document

16611 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

intend on implementing this balanced approach or how the strategic allocation of housing contributes to the balance required. Our Client cannot support this approach until further detail is understood as to the proportion of housing being allocated to each settlement tier.

10. The proposed distribution of housing development during the plan period does not appear to be proportionately allocated between the various settlement tiers. We would argue that development should be distributed proportionately in line with the size of the settlement in order to benefit for available services and facilities. Rayleigh recognised as having best access to services within the district at Paragraph 2.68 of the Core Strategy. On this basis it is considered the development should primarily be directed to Rayleigh with a proportionate level of housing to the remaining settlements in the District.

Policy H1 - The efficient use of land for housing

11. In general the use of residential extensions to meet the remaining housing requirement that cannot be delivered through the redevelopment of appropriate previously developed land is supported by Fairview New Homes.

12. It is understood there is a need to prioritise use of brownfield land in line with national policy requirements but this needs to be a carefully balanced and realistic approach in identifying appropriate urban extensions to accommodate the majority of the District's housing, as identified in the table at Paragraph 4.6 and later at Paragraph 4.15.

13. Policy H1 sets out that the Council will seek the redevelopment of Rawreth Lane Industrial Estate, Foundry Industrial Estate, Stambridge Mills and Star Lane Industrial Estate. Without sight of the 2009 SHLAA it is not possible to understand whether the Council's choice to release employment land for housing is appropriate and Fairview New Homes cannot, therefore, support this element of Policy H1. This objection is further amplified by the fact additional employment land is required but is yet to be identified.

Policy H2 - Extensions to residential envelopes and phasing

14. The Council's intention to provide a balanced strategy for housing provision is mentioned again at Paragraph 4.18. The comments made at Paragraphs 9 and 10 above are also relevant in this respect.

15. In comparing the Preferred Options Core Strategy Document and Submission Core Strategy Document there is a significant reduction in the number of housing units being provided in urban extensions pre 2015, from 1450 dwellings to 775. From discussions with the Local Planning Authority it is understood the Council are seeking to provide the District's housing requirements by increased development densities. From the evidence available in the Submission Core Strategy and summary of SHLAA sites a number of the sites identified as urban extensions have in fact been allocated a reduced number of dwellings, including the land to the north of London Road, Rayleigh. We would, therefore, consider the approach taken by the Local Planning Authority to provide the required level of housing is untenable and unjustified.

16. In discounting preferred options PPS12 makes clear at Paragraph 4.38 the requirement for Local Planning Authorities to consider and evaluate reasonable alternatives. As set out above, the choices the Council have pursued have not been substantiated and without the consideration of reasonable alternatives the Core Strategy cannot be considered justified and therefore unsound.

17. However, this is our opinion based only on discussions with the Local Planning Authority rather than a thorough evidence base and we will consider the evidence in detail when it become available and provide further comment.

18. Paragraph 4.19 of the draft Core Strategy details the Council's primary factors in determining the location of future urban extensions. It is presumed the Council have assessed each of the proposed urban extension sites against the following criteria and that this information is contained within the SHLAA, although we have not been provided with any evidence of this to assess. It can be demonstrated that the land identified on the attached site location plan meets all of the requirements set out below.

â€¢ The proximity and relationship to existing centres, facilities, services

â€¢ The availability of infrastructure and/or the potential for additional infrastructure to be provided for development in such areas

â€¢ The potential to reduce private car dependency

â€¢ The potential to avoid areas of constraint (such as areas at risk of flooding, sites of ecological importance, public safety zone etc)

â€¢ The historical, agricultural and ecological value of land

â€¢ The impact on highway network (including availability and impact on existing network, as well as potential for improvements to be delivered)

â€¢ The relationship of development locations to the District's area of employment growth

â€¢ The potential to create a defensible Green Belt boundary

â€¢ The avoidance of coalescence with neighbouring settlements

19. In summary, Fairview's land is sustainably located in particularly close proximity to Rayleigh Town Centre and train station. In addition, the location of the land provides a natural extension and rounding of settlement boundary. An extension to Rayleigh in this location offers no opportunity for coalescence with neighbouring settlements nor does it constitute urban sprawl.

Core Strategy Submission Document

16611 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Policy H2 - Extensions to residential envelopes and phasing

20. Although it is stated a flexible approach to the timings of the release of land will be maintain no explanation is provided as to why some sites are considered suitable for development pre 2015 and others post 2015. Paragraph 4.22 elaborates further to state a number of factors have been considered when determining the phasing of strategic housing sites although this information is not clearly available to assess.

21. As stated above the principle of releasing certain areas of greenbelt land is considered the best approach to meeting the Council's housing provision requirements. However, Fairview New Homes object to the omission of the land to the South West of Rayleigh for housing development as previously identified in the Core Strategy Preferred Options document. The site identified on the attached site location plan has been assessed against the Council's criteria, as set out at Paragraph 18 above and each requirement can be met. Without any clear explanation as to why this site has been discounted and the only other strategic housing site identified in Rayleigh is located further away from Rayleigh Town Centre and the associated services and facilities including the train station, Fairview New Homes object to Policy H2.

22. As considered at the outset of these representations the draft Core Strategy cannot be considered robust, and therefore sound, without clear justification and evidence base.

Policy H3 - Extension to residential envelopes post-2021

23. Policy H3 is supported on the basis that the release of greenbelt land is required for housing and this is the most appropriate approach to meet the Council's housing requirements, as set out at Paragraph 21 above.

24. However, it is unclear why some of the sites previously identified for housing development pre 2015 up until 2021 in the Preferred Options Core Strategy document have now been allocated for development post 2021, such as South East Ashingdon. It is stated at Paragraph 4.24 of the Submission Core Strategy document those areas identified for post 2021 development may not be immediately deliverable. However, there is no information available to understand why these sites are now no longer considered suitable for pre 2015 development as they were in December 2008. As a result, Fairview New Homes consider Policy H3 to be unjustified and therefore unsound.

Affordable Housing

25. The acute need for additional affordable housing is recognised at Paragraph 4.30. It is unclear from the draft Core Strategy document exactly how much affordable housing is required in the District in the plan period.

26. However, taking the starting point as set out at Paragraph 4.30 that the Thames Gateway South Essex Strategic Housing Market Assessment requires 131 net additional affordable dwellings per year which constitutes 52% of the District's overall annual housing target. In order to achieve this target using the Council's proposed policy requirement that new housing developments are to provide 35% affordable housing, 375 new dwellings would need to be developed each year. This calculation does not account for those developments with fewer than 15 dwellings which have no requirement to provide affordable housing or developments which cannot viably afford to provide non-market housing.

27. An annual requirement of 250 dwellings is identified at Paragraph 4.2 of the Core Strategy which would leave a significant short fall of affordable housing and act to compound the current situation. The approach taken by the Council ultimately accepts there will always be a shortfall in affordable housing provision and does not seek to redress this. We do not, therefore, consider this to be a robust or justified approach to achieving affordable housing in the District.

28. It is, therefore, considered in order to meet the District's affordable housing requirement additional housing land should be identified in order to ensure a wholesale increase in housing provision to address the Council's shortfall in affordable housing and meet the targets set for the plan period. The most appropriate and effective method by which to secure affordable housing provision is through developing large sites that are viably able to offer affordable housing units.

29. During the consultation of the submission Core Strategy the Council's Housing Strategy (2009) was not available and we reserve the right to make further comment on this document following the publication of this evidence.

The Green Belt

30. It is fully accepted by the Council that the Green Belt boundary is currently too tightly drawn and the release of some Green Belt land is necessary to meet the District's development requirements. However, it needs to be demonstrated that the areas of Green Belt land to be lost are justified and located in the most appropriate area and that areas of release land do not undermine the principle of the Green Belt.

31. It is understood from Paragraph 6.7 of the Submission Core Strategy the Council will seek to examine the degree to which current Green Belt land is helping to achieve the purposes of the Green Belt when considering reallocating land. However, areas of Green Belt are proposed to be reallocated for urban extensions prior to this research being undertaken.

Core Strategy Submission Document

16611 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

32. Fairview New Homes fully support the justified retention of the areas of Green Belt where appropriate and the release of Green Belt land where needed. However, at present the proposed Housing policies and Green Belt policies are not coherent and the reallocation of certain areas of Green Belt is not based on a credible evidence base.

Environmental Issues

Policy ENV4 - Sustainable Drainage Systems (SUDS)

33. Fairview New Homes would like to support the flexibility contained within Policy ENV4 which recognises it is not always viably possible to incorporate SUDS in all developments.

Policy ENV8 - On Site Renewable and Low Carbon Energy Generation

34. We would also like to support Policy ENV8 on the same basis as Policy ENV4 in that it is important that the production of energy from renewable or low carbon sources is only required where it is viably possible so as not to resulting in developments not coming forward.

Transport

Policy T8 - Parking Standards

35. Fairview New Homes object to Policy T8 as it is currently contrary to National Policy requirements as set out in PPG13 which contains maximum parking standards. Indeed, this is recognised at Paragraph 10.27 of the Submission Core Strategy document. Enforcing minimum parking standards is not consistent with local or national sustainability aims and should not be an approach pursued by the Council.

Summary:

Policy H2 - Extensions to residential envelopes and phasing

14. The Council's intention to provide a balanced strategy for housing provision is mentioned again at Paragraph 4.18. The comments made at Paragraphs 9 and 10 above are also relevant in this respect.

15. In comparing the Preferred Options Core Strategy Document and Submission Core Strategy Document there is a significant reduction in the number of housing units being provided in urban extensions pre 2015, from 1450 dwellings to 775. From discussions with the Local Planning Authority it is understood the Council are seeking to provide the District's housing requirements by increased development densities. From the evidence available in the Submission Core Strategy and summary of SHLAA sites a number of the sites identified as urban extensions have in fact been allocated a reduced number of dwellings, including the land to the north of London Road, Rayleigh. We would, therefore, consider the approach taken by the Local Planning Authority to provide the required level of housing is untenable and unjustified.

16. In discounting preferred options PPS12 makes clear at Paragraph 4.38 the requirement for Local Planning Authorities to consider and evaluate reasonable alternatives. As set out above, the choices the Council have pursued have not been substantiated and without the consideration of reasonable alternatives the Core Strategy cannot be considered justified and therefore unsound.

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19. In summary, Fairview's land is sustainably located in particularly close proximity to Rayleigh Town Centre and train station. In addition, the location of the land provides a natural extension and rounding of settlement boundary. An extension to Rayleigh in this location offers no opportunity for coalescence with neighbouring settlements nor does it constitute urban sprawl.

Core Strategy Submission Document

O - 16611 - 5219 - Policy H2 - Extensions to residential envelopes and phasing - i, ii

16611 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Change to Plan

Appear at exam? Yes

Soundness Tests i, ii

Core Strategy Submission Document

O - 16612 - 5219 - Policy H2 - Extensions to residential envelopes and phasing - i, ii

16612 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Fairview New Homes Ltd [5219]

Fairview New Homes Ltd
50 Lancaster Road
Enfield
Middlesex
EN2 0BY
020 83661271

Agent: Planning Potential (Miss G Brickwood) [7549]

Planning Potential
Palace House
3 Cathedral Street
London
SE1 9DE
0207 357 8000

Full Text: Representations on behalf of Fairview New Homes

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Core Strategy Submission Document

16612 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

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Core Strategy Submission Document

16612 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Policy H2 - Extensions to residential envelopes and phasing

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Policy H3 - Extension to residential envelopes post-2021

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24. However, it is unclear why some of the sites previously identified for housing development pre 2015 up until 2021 in the Preferred Options Core Strategy document have now been allocated for development post 2021, such as South East Ashingdon. It is stated at Paragraph 4.24 of the Submission Core Strategy document those areas identified for post 2021 development may not be immediately deliverable. However, there is no information available to understand why these sites are now no longer considered suitable for pre 2015 development as they were in December 2008. As a result, Fairview New Homes consider Policy H3 to be unjustified and therefore unsound.

Affordable Housing

25. The acute need for additional affordable housing is recognised at Paragraph 4.30. It is unclear from the draft Core Strategy document exactly how much affordable housing is required in the District in the plan period.

26. However, taking the starting point as set out at Paragraph 4.30 that the Thames Gateway South Essex Strategic Housing Market Assessment requires 131 net additional affordable dwellings per year which constitutes 52% of the District's overall annual housing target. In order to achieve this target using the Council's proposed policy requirement that new housing developments are to provide 35% affordable housing, 375 new dwellings would need to be developed each year. This calculation does not account for those developments with fewer than 15 dwellings which have no requirement to provide affordable housing or developments which cannot viably afford to provide non-market housing.

27. An annual requirement of 250 dwellings is identified at Paragraph 4.2 of the Core Strategy which would leave a significant short fall of affordable housing and act to compound the current situation. The approach taken by the Council ultimately accepts there will always be a shortfall in affordable housing provision and does not seek to redress this. We do not, therefore, consider this to be a robust or justified approach to achieving affordable housing in the District.

28. It is, therefore, considered in order to meet the District's affordable housing requirement additional housing land should be identified in order to ensure a wholesale increase in housing provision to address the Council's shortfall in affordable housing and meet the targets set for the plan period. The most appropriate and effective method by which to secure affordable housing provision is through developing large sites that are viably able to offer affordable housing units.

29. During the consultation of the submission Core Strategy the Council's Housing Strategy (2009) was not available and we reserve the right to make further comment on this document following the publication of this evidence.

The Green Belt

30. It is fully accepted by the Council that the Green Belt boundary is currently too tightly drawn and the release of some Green Belt land is necessary to meet the District's development requirements. However, it needs to be demonstrated that the areas of Green Belt land to be lost are justified and located in the most appropriate area and that areas of release land do not undermine the principle of the Green Belt.

31. It is understood from Paragraph 6.7 of the Submission Core Strategy the Council will seek to examine the degree to which current Green Belt land is helping to achieve the purposes of the Green Belt when considering reallocating land. However, areas of Green Belt are proposed to be reallocated for urban extensions prior to this research being undertaken.

Core Strategy Submission Document

16612 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

32. Fairview New Homes fully support the justified retention of the areas of Green Belt where appropriate and the release of Green Belt land where needed. However, at present the proposed Housing policies and Green Belt policies are not coherent and the reallocation of certain areas of Green Belt is not based on a credible evidence base.

Environmental Issues

Policy ENV4 - Sustainable Drainage Systems (SUDS)

33. Fairview New Homes would like to support the flexibility contained within Policy ENV4 which recognises it is not always viably possible to incorporate SUDS in all developments.

Policy ENV8 - On Site Renewable and Low Carbon Energy Generation

34. We would also like to support Policy ENV8 on the same basis as Policy ENV4 in that it is important that the production of energy from renewable or low carbon sources is only required where it is viably possible so as not to resulting in developments not coming forward.

Transport

Policy T8 - Parking Standards

35. Fairview New Homes object to Policy T8 as it is currently contrary to National Policy requirements as set out in PPG13 which contains maximum parking standards. Indeed, this is recognised at Paragraph 10.27 of the Submission Core Strategy document. Enforcing minimum parking standards is not consistent with local or national sustainability aims and should not be an approach pursued by the Council.

Summary:

Policy H2 - Extensions to residential envelopes and phasing

20. Although it is stated a flexible approach to the timings of the release of land will be maintain no explanation is provided as to why some sites are considered suitable for development pre 2015 and others post 2015. Paragraph 4.22 elaborates further to state a number of factors have been considered when determining the phasing of strategic housing sites although this information is not clearly available to assess.

21. As stated above the principle of releasing certain areas of greenbelt land is considered the best approach to meeting the Council's housing provision requirements. However, Fairview New Homes object to the omission of the land to the South West of Rayleigh for housing development as previously identified in the Core Strategy Preferred Options document. The site identified on the attached site location plan has been assessed against the Council's criteria, as set out at Paragraph 18 above and each requirement can be met. Without any clear explanation as to why this site has been discounted and the only other strategic housing site indentified in Rayleigh is located further away from Rayleigh Town Centre and the associated services and facilities including the train station, Fairview New Homes object to Policy H2.

22. As considered at the outset of these representations the draft Core Strategy cannot be considered robust, and therefore sound, without clear justification and evidence base.

Change to Plan

Appear at exam? Yes Soundness Tests i, ii

Core Strategy Submission Document

S - 16655 - 14237 - Policy H2 - Extensions to residential envelopes and phasing - None

16655 Support

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr B Pinkerton [14237]

Agent: N/A

Magees Nurseries
Rectory Road
Hawkwell
Essex
SS5 4LH

Full Text:

We are supportive that the council have identified housing provision within Hawkwell. It is considered that this location is sustainable due to its close proximity to existing town centres. The provision of development in this location will enable highway infrastructure improvements which will ease current congestion. Existing previously developed sites existing within Hawkwell, (e.g. Magees Nurseries) offer opportunities for redevelopment of Brownfield land in line with government objections. Furthermore there is sufficient adjacent land in this location to provide comprehensive development.

The change we would like to see is that policy H2 is altered to refer to North Hawkwell or generally Hawkwell. It is considered development can be better constrained by the existing railway in the north of Hawkwell and will prevent sprawl to the south however this will be further considered in the Allocations Document. The reference to Hawkwell within the Core Strategy should be less site specific within this general strategy.

Summary:

We are supportive that the council have identified housing provision within Hawkwell. It is considered that this location is sustainable due to its close proximity to existing town centres. The provision of development in this location will enable highway infrastructure improvements which will ease current congestion. Existing previously developed sites existing within Hawkwell, (e.g. Magees Nurseries) offer opportunities for redevelopment of Brownfield land in line with government objections. Furthermore there is sufficient adjacent land in this location to provide comprehensive development.

Change to Plan N/A

Appear at exam? No

Soundness Tests N/A

Core Strategy Submission Document

O - 16656 - 8283 - Policy H2 - Extensions to residential envelopes and phasing - i, iii

16656 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr & Mrs Gladding [8283]

7 Downhall Park Way
Rayleigh
Essex
SS6 9QP
01268 785204

Agent: N/A

Full Text: The proposal to use the green belt agricultural land "North of London Road" for 550 dwellings is contrary to National policy PPG2. PPG2 give 5 purposes for the Green Belt and the land in question satisfies them all. Therefore the document is unsound in national policy terms and should be changed.

There are other brownfield sites that could be used for the 550 dwellings (some of which have been identified by Rawreth Parish Council).

Core Strategy Submission Development Plan Document (DPD) Proposal for Additional Housing in Rawreth/West of Rayleigh (North of London Road)

I am objecting to the proposal to build an additional 770 dwellings between London Road and Rawreth Lane, 220 on the Rawreth Industrial Estate site behind Makro (this extra amount curiously not mentioned!) and 550 on farmland (classed as green belt/green field) land. Whilst there may be some merit in a development on the Rawreth Industrial Estate, where units are rather old and could perhaps be moved to a more modern site, the proposal for the farmland is really a step too far for the reasons below:

The Government & Politicians of all parties keep banging on about climate change, carbon footprints and the possibility of not being able to grow enough food for everyone and YET here, a proposal to concrete over farmland which could be used to grow more local produce rather than flying products over thousands of miles; thereby not exactly helping the so called carbon footprint. This farmland should be saved to help safeguard the countryside from encroachment, instead of crating a vast housing estate, which seems utterly ridiculous. Derelict and other urban land should be considered as a first priority to assist in regeneration.

My fear and concern is that once the plan gets the green light, there will be no stopping the limitless sprawl of western Rayleigh and Rawreth, since there are similar green field sites along other parts of Rawreth Lane, which could ultimately fall prey to the chipping away of the remaining green belt/green field land. If this happened there would be nothing to prevent neighbouring towns merging into one another, which would totally take away this part of Rayleigh's distinctive character and pleasant community feeling (something which the Core Strategy Plan states it wants to safeguard!). It also greatly reduces habitats for birds and other wildlife, which is very important to many of us.

The development would put a massive pressure on the roads and amenities around Rayleigh, which would have a very detrimental effect. This is not a case of nimbyism as this part of Rayleigh & Rawreth has already seen extensive development in recent years. There really needs to be a balance of green areas and housing not the total saturation and erosion of the countryside that would take place if this proposal were allowed to happen.

Summary: The proposal to use the green belt agricultural land "North of London Road" for 550 dwellings is contrary to National policy PPG2. PPG2 give 5 purposes for the Green Belt and the land in question satisfies them all. Therefore the document is unsound in national policy terms and should be changed.

Change to Plan There are other brownfield sites that could be used for the 550 dwellings (some of which have been identified by Rawreth Parish Council).

Appear at exam? No **Soundness Tests** i, iii

Core Strategy Submission Document

O - 16658 - 8484 - Policy H2 - Extensions to residential envelopes and phasing - i

16658 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr and Mrs A T Clark [8484]

111 Main Road
Hawkwell
Hockley
Essex
SS5 4ET

Agent: N/A

Full Text:

Objection to Rochford Core Strategy, 175 Houses in Hawkwell is UNSOUND
The above proposal is totally and without any doubt UNSOUND for the following reasons.

Limited choice of public transport.

The ultimate increase in car use which could cause heavy congestion along with more traffic noise. As we live on the main road in Hawkwell, which would carry most of the extra traffic, I can assure you that the level of noise etc. which already exists is problematic enough already.

The area in question simply does NOT have the ability to improve the highways.

Because of the distance to shopping facilities it would necessitate the majority of new residents having to shop by car.

There are no local rail stations in the proposed area thus, once again causing nay new residents having to get to and from Hockley/Rochford rail stations by car.

On the environment issue:

This is a semi rural location which is totally unsuitable for further development. In actual fact we are of the strong opinion that the area has already well and truly reached its limit.

If the proposal did go ahead the area would take on a complete change of character. Once green belt is built on it is lost forever.

Wildlife is suffering enough and any more new homes would cause further loss.

We cannot see any benefits whatsoever arising socially, economically nor environmentally. If anything they have already decreased.

If we had had any inkling that the proposals would be put forward we would never have moved here in the first place. It was the area that we liked but it had already changed with enough new homes having been built.

WE DO NOT NEED NOR WANT ANY MORE.

Summary:

The above proposal is totally and without any doubt UNSOUND for the following reasons.

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Core Strategy Submission Document

O - 16658 - 8484 - Policy H2 - Extensions to residential envelopes and phasing - i

16658 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

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WE DO NOT NEED NOR WANT ANY MORE.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16664 - 8069 - Policy H2 - Extensions to residential envelopes and phasing - i, ii, iii

16664 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: A W Squier LTD and the Croll Group [8069]

A W Squier LTD and the Croll Group
Doggetts
Rochford

SS4 3RN

Agent: Andrew Martin Associates Ltd (Mr R Pomery) [7786]

Andrew Martin Associates Ltd
Croxtan's Mill
Little Waltham
Chelmsford
Essex
CM3 3PJ
01245 361611

Full Text: Policy H2 - Extensions to residential envelopes and planning

Summary: The Respondent finds the document to be unsound in its present form, however were the amendments set out in these representations to be incorporated then it is considered that the document will be sound. The general locations identified in the Core Strategy (CS) are supported. However, the respondent has prepared an indicative master plan illustrating an option for the broad locations in Ashingdon. This demonstrates that the site known as East Ashingdon could accommodate more than 150 dwellings and it must be recognised that to deliver enhancements to King Edmund School and remain viable, these sites will need to deliver this quantum of development. There is no justification for the phasing of the residential site and therefore policies H2 and H3 should be combined. In addition, the means by which the sites are identified are too vague and the general locations are not consistent with the key diagram.

Full text: The purpose of providing the Illustrative Master plan (drawing ref: 97069/07) is to demonstrate that there is sufficient land available within the locations to accommodate the growth; in fact, the area could take more. The master plan is designed to be illustrative to show what could be achieved and is by no means the only layout option. In addition, the master plan illustrates a workable and tested improvement to the access to King Edmund School and shows a possible location for the 3.0 hectare expansion of the school, required by policy CLT 3. It is understood that it may be more viable to build a new school either on the existing site or on adjacent land. The master plan option caters for such an eventuality as well as providing options for the layout of housing and public open space. The respondent has commissioned a Highway Access Strategy, which considers the optimum location of access points to serve the land parcels.

The land parcel in the broad location identified in the Core Strategy as East Ashingdon is largely free of constraint and both developable and deliverable in the first five years of the plan period. Sufficient housing land is available to exceed the allocations set out in Policies H2 and there are many advantages to the location, which would allow for additional growth. The respondent owns approximately 28 hectares of land in the general vicinity of the broad locations of "East" and "South-East" Ashingdon abutting the urban area, which would accommodate up to 1000 residential units at 40 dwellings per hectare, as well as providing an additional 3.0 hectares for expansion of the school. The land is available and developable in the short term. It has the following advantages in terms of developability:

- * the site contains a main sewer complete with existing manholes;
- * un-contaminated land in arable use;
- * falls within flood zone 1;
- * abuts the urban area;
- * is accessible and within walking distance of a secondary and three primary schools, shops, services and public transport;
- * accessible to main drainage facilities and utilities;
- * within agricultural land classification 3;
- * located in an area free of special or important landscape or biodiversity designations; and
- * does not contain any important ecological or sensitive habitat areas.

In relation to the Green Belt and the five purposes of including land within the Green Belt:

- * the land parcels would round off or infill the urban edge;
- * there is no possibility of coalescence, the nearest settlement is several miles to the east;
- * the urban extensions will not encroach into the countryside, much beyond the existing urban edge; and
- * the location does not interfere or impact on the setting or special character of a historic town or settlement.

The land parcels are capable of exceeding the allocations set out in the Core Strategy whilst enhancing the access and size of King Edmund School, a vital component in the District's infrastructure. The development will result in only limited harm to the character and appearance of the countryside and as such, the Council should give greater consideration to the production of more detailed assessment through the Site Allocations DPD and an early planning application.

1. Land at East Ashingdon is capable of accommodating a higher level of development

As identified above, and demonstrated by the accompanying masterplan, land at East Ashingdon is actually capable of accommodating approximately around 150 dwellings and this should be reflected in Policy H2.

The allocations in Policy H2 should also allow for flexibility in the number of units possible on any given allocation. A clear statement should be included in the policy, which identifies that the allocations assigned to each location are minimum requirements reflecting advice in KSS14 and would be reliant on the developability of individual sites. Whilst the Council has been reluctant to be specific on the land parcels involved, it has chosen to be specific on the number of

Core Strategy Submission Document

O - 16664 - 8069 - Policy H2 - Extensions to residential envelopes and phasing - i, ii, iii

16664 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

units it expects from each of the broad locations. On further analysis, it could be quite possible that a lack of constraints in a particular area might prompt the possibility, or even the desirability, of providing additional units in any given location. The policy does not appear to allow for this and should be amended to explain that the numbers assigned to any given area are not fixed and that further consideration will be given to the eventual number of units on a site by site basis, through the Allocations DPD. If land such as the site at Stambridge Mill does not come forward, the policy as currently drafted provides no flexibility to ensure that alternative sites come forward.

2. There is no justification for the phasing of development

The Council's limited reasoning for phasing set out in the Core Strategy is not justified. It is also contradicted by the statement found in policies H2 and H3 which states;

"We 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".

The phasing is either necessary for a material reason set out in the document or the allocation of land will be flexible to ensure a continuous five year supply is maintained. If the phasing is to remain, more detailed explanation is required. In the absence of any reasoned justification, it appears that the main reason for the phasing is to stagger the release of land over the plan period. Staggering development in this way is not necessary if the authority is maintaining a constant 5 year supply. RSS14 advocates that the allocations it provides the districts are minimums and that authorities should not see them as ceilings. The CS is presented in such a way as to imply that the Council could suspend development, if demand exceeds any particular phase. Such an approach, of applying the brakes to keep in line with the phasing of the plan, would be completely at odds with RSS14 and the Government's approach to housing delivery. The Core Strategy does not provide for the possibility of the market delivering more than the RSS minimum allocation or at a faster rate than the phasing allows; this is inflexible and contrary to PPS3, paragraph 52 which recognises the importance of a flexible supply of land for housing. This comment is made without prejudice to our client's land at East Ashingdon as this land can be delivered in the early part of the plan period in accordance with the policy.

3. The means by which the sites are identified is too vague.

Whilst the respondent supports the general locations identified in the CS, the means by which the land is identified is considered too vague. The respondent does not agree with the Council's opening statement in this section of the Strategy, which states:

"It is not the purpose of the Core Strategy to set out precise locations for new development - this is done through the Allocations Development Plan Document".

Whilst it may not be necessary in Rochford to identify the exact boundaries of strategic sites, the information that is given is too vague. The advice in Planning Policy Statement 12, Local Spatial Strategy (PPS 17, 2008) is that:

"Core Strategies may allocate strategic sites for development. The Core Strategy looks to the long term. It may be beneficial to delivery of its objectives for details of key sites to be included in it, where these sites are central to the achievement of the strategy and where investment requires a long lead-in"

Further, at paragraph 4.3, it states:

"it is essential that the core strategy makes clear spatial choices about where developments should go in broad terms. This strong direction will mean that the work involved in the preparation of any subsequent DPDs is reduced. It also means that decisions on planning applications can be given a clear steer immediately."

There can be little dispute, that the greenfield locations identified in the Core Strategy are essential to the delivery of the spatial strategy. At present, the district cannot demonstrate a 5 year supply of housing land, as required by PPS3. The lack of a 5 year supply may result in a rash of early planning applications coming forward on greenfield land, which could undermine the Council's spatial strategy and the preparation of the Allocations DPD. To guard against this and to channel development towards the most appropriate locations, the Council has the option of being more site specific in its Core Strategy. This option would in principle be supported by PPS12 and could apply to the delivery of one or more of the Ashingdon locations identified in Policy H2 and thus assist the Council in demonstrating a five year supply of housing land.

It is acknowledged in Policy H2 that the Council will be flexible with regard to the timing of the release of land to ensure a five year supply of land. Therefore, there is no reason not to be site specific on sufficient land that will bring forward development to meet the Council's current 5 year shortfall. The respondent feels that the land north and south of Brays Lane would be one such location, which could be specifically allocated in the Core Strategy. The land has been broadly identified by the Core Strategy and its early release would ensure a continuous five year supply, assist in the delivery of public open space, a long held aspiration of the Local Plan and more importantly, resolve a long standing and the pressing need to improve access to King Edmund School.

4. The names of the allocations are misleading and are not consistent with the Key Diagram

Whilst the respondent supports the allocations described as East and South-East Ashingdon and the locations indicated on the Key Diagram, the names given to the allocations causes unnecessary confusion.

The Key Diagram does not have symbols identifying the extensions to the residential envelope at geographical

Core Strategy Submission Document

O - 16664 - 8069 - Policy H2 - Extensions to residential envelopes and phasing - i, ii, iii

16664 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

locations, which correspond with land that would be understood as East and South-East Ashingdon. The Ashingdon parish boundary terminates along Brays Lane. The land south of Oxford Road is thus fully within Rochford. We submit that the allocation under policy H2 covering land north and south of Brays Lane should be described as South Ashingdon. The land south of Oxford Road should be described as North East Rochford.

The infrastructure requirements set out in Appendix H1 appear to be linked to the individual greenfield release of land and therefore the provision of site specific contributions, not district wide off-site provision. The infrastructure required for each release set out in Appendix H1 can be adequately secured through Planning Obligations attached to the planning consents relating to the individual releases of land. The obligations would then ensure that the infrastructure for the site took place ahead of occupation.

Proposed Amendment to Policy H2: In order to maximise the development potential and delivery of sites and make the policy sound, the following changes should be made to the policy:

- * Combine policies H2 and H3 and delete reference to the different time periods;
- * Amend "East Ashingdon" to read "South Ashingdon" and "South-East Ashingdon" to read "North-East Rochford"; and
- * Amend the capacity of the site identified as East Ashingdon (i.e. north and south of Brays Lane) to 150 dwellings.

Masterplan/Facilities plan Council ref AE22

Summary:

Summary: The Respondent finds the document to be unsound in its present form, however were the amendments set out in these representations to be incorporated then it is considered that the document will be sound. The general locations identified in the Core Strategy (CS) are supported. However, the respondent has prepared an indicative master plan illustrating an option for the broad locations in Ashingdon. This demonstrates that the site known as East Ashingdon could accommodate more than 150 dwellings and it must be recognised that to deliver enhancements to King Edmund School and remain viable, these sites will need to deliver this quantum of development. There is no justification for the phasing of the residential site and therefore policies H2 and H3 should be combined. In addition, the means by which the sites are identified are too vague and the general locations are not consistent with the key diagram.

Masterplan/Facilities plan Council ref AE22

Change to Plan

Proposed Amendment to Policy H2: In order to maximise the development potential and delivery of sites and make the policy sound, the following changes should be made to the policy:

- * Combine policies H2 and H3 and delete reference to the different time periods;
- * Amend "East Ashingdon" to read "South Ashingdon" and "South-East Ashingdon" to read "North-East Rochford"; and
- * Amend the capacity of the site identified as East Ashingdon (i.e. north and south of Brays Lane) to 150 dwellings.

Appear at exam? Yes

Soundness Tests i, ii, iii

Core Strategy Submission Document

S - 16687 - 9072 - Policy H2 - Extensions to residential envelopes and phasing - None

16687 Support

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Essex County Council (Mr Roy Lewis) [9072] **Agent:** N/A

Essex County Council
ESH - Spatial Planning
Planning and Transport
County Hall
Chelmsford
CM1 4JU
01245-437578

Full Text: ROCHFORD CORE STRATEGY SUBMISSION DOCUMENT, SEPTEMBER 2009
RESPONSE OF ESSEX COUNTY COUNCIL

1. General Comment

Essex County Council welcomes and broadly supports the Core Strategy prepared by Rochford District Council. The Strategy contains policies and proposals that address the spatial characteristics, issues and opportunities facing the District whilst respecting the distinctive qualities of the different settlements and parts of the District.

The County Council fully supports the maintenance of a strong policy approach to protection of the Green Belt and of the quality of environmental assets in the District whilst making adequate housing and employment provision within the District. The Core Strategy presents an approach that emphasises a balance of opportunity through the District and recognition of emerging economic prospects in the District and neighbouring areas. The intended preparation of more detailed Action Area Plans for London Southend Airport and its environs and for each of the three town centres of Rayleigh, Rochford and Hockley will further enhance the approach of the Core Strategy. The emphasis on the three town centres is particularly welcomed as offering a stimulus to improvement in the services and facilities available locally within the District whilst also affording possibilities of increased community focus.

2. Housing Distribution and Locations

The East of England Plan requires Rochford to provide a minimum of 3,790 additional dwellings between 2006 and 2021. In addition, provision for a further 1,000 dwellings should be made between 2021 and 2025 to ensure delivery of housing for at least 15 years from adoption of the Core Strategy (expected in 2010). Of this total requirement the District Council has identified a capacity of 2,000 dwellings through a Strategic Housing Land Availability Assessment. This means that the Core Strategy has to identify locations for about 1,750 dwellings to be delivered before 2021 and a further 1,000 dwellings between 2021 and 2025.

Policy H1 (The efficient use of land for housing) is supported. However, prioritisation of the reuse of previously developed land within settlements for additional housing is unlikely to provide a sufficient source of provision due to the generally residential nature of existing settlements in the district and the absence of potentially large sites of previously developed land. The assessment of potential for additional housing provision within settlements already includes the proposed re-allocation to substantially residential use of 4 existing employment areas.

Within Policy H2 (Extensions to residential envelopes and phasing) and Policy H3 (Extension to residential envelopes post-2021) the District Council has adopted a balanced approach to the distribution of additional housing locations, which is based on identification of tiers of settlements defined by reference to their accessibility to jobs, services and facilities (some of which lie outside the District) and the need to protect the valued environments within the District. This approach is generally supported, although implementation and delivery of individual schemes should give further thought to securing sustainable functional relationships between proposed development locations and availability of jobs, services and facilities.

The proposed scale and phasing of development at each of the identified locations in Policy H2 and Policy H3 should be capable of being supported by County Council service groups, provided that adequate and timely funding is available. The County Council would wish to work with the District Council to ensure that future infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

3. Economic Development

The approach to Employment Growth (Policy ED1) is supported. Given the economic structure of Rochford District the support to be given to protection and enhancement of the role of small and medium sized businesses; enhancement of the District's commercial centres; and development of a skills training academy is particularly welcome. These measures will assist in building on the existing economic resource of the District.

Proposals for the comprehensive development of London Southend Airport and its environs (Policy ED2) are supported.

Core Strategy Submission Document

S - 16687 - 9072 - Policy H2 - Extensions to residential envelopes and phasing - None

16687 Support

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

The further elaboration of proposals through an Area Action Plan will provide a firm foundation to realise the economic regeneration and growth opportunities presented by effective use of the Airport. The recognition of the potential environmental impact of the Airport and the commitment to work to mitigate any adverse impacts on the environment and local amenities is fully supported.

The location of the proposed Eco-Enterprise Centre to the North of London Southend Airport (Policy ED4) is supported. Creation of the Centre would assist reduction of the rate of business start-up failure in the district. Further the proposed location for the Centre would afford a clear offer to businesses within an area of varied business activity.

The continued protection and enhancement of existing employment land (Policy ED3) is supported, as is the identification of 4 existing employment sites for appropriate alternative, substantially residential, uses. Each of the 4 sites affords particular issues and opportunities whereby their redevelopment for other uses and relocation of existing occupiers would confer advantage for the immediately neighbouring areas and for the District as a whole.

4. Town Centres

The town centres of Rayleigh, Rochford and Hockley, and future plans for them, are closely linked to the economic development of the District but also present the opportunity to offer greater community focus within the District. The varied approach being taken to each of these town centres is supported (Policy RTC4, RTC5 and RTC6), notably the recognition of the role and purpose of the town centres beyond retail uses.

The contribution that the County Library service could make to plans for the town centres should not be overlooked. The 5 libraries in the District are substantial footfall draws in their localities and act as a 'community anchor store'. This has knock-on effects in encouraging use of neighbouring retail and service facilities. Further the Library service is currently looking at co-location opportunities for other services within the libraries which would enable them to act as a community focus.

5. Transport

The transport aspects of the Core Strategy are well balanced in identifying potential measures that would meet the needs of existing residents and businesses in the District as well as needs arising from future development. The approach reflects and makes good reference to the transportation aspirations of the County Council. The policy emphasis on close working between the District Council and the County Council to advance the transport aspirations is welcomed and fully supported.

In relation to parking standards (Policy T8 and Paragraph 10.30) the review undertaken by Essex County Council in conjunction with the Essex Planning Officers Association has now been completed. Revised parking standards have been agreed and signed off as County Supplementary Guidance, in accordance with PPS12, and is being applied by the County Council as Local Highways Authority.

6. Coastal Protection Belt

Policy ENV2 (Coastal Protection Belt) is not supported because in its current form it is not a suitable or effective replacement policy for Policy CC1 of the Replacement Structure Plan. Structure Plan Policy CC1 (The Undeveloped Coast - Coastal Protection Belt) currently remains a 'saved' policy of the Essex and Southend-on-Sea Replacement Structure Plan, April 2001 (following a direction of the Secretary of State, dated 27th September 2007, under paragraph 1(3) of Schedule 8 to the Planning and Compulsory Purchase Act 2004). The existing Policy CC1 reads, 'Within the Coastal Protection Belt defined in adopted local plans there shall be the most stringent restrictions on development within the rural and undeveloped coastline situated outside existing built-up areas, and any development which is exceptionally permitted within this Belt shall not adversely affect the open and rural character, historic features or wildlife.'

Core Strategy Policy ENV2 should be revised to include specific reference to,

- * Definition of the boundary of the Coastal Protection Belt in another Development Plan Document;
- * the application of the most stringent restrictions on development within the rural and undeveloped coastline;
- * any development exceptionally permitted not adversely affecting the open and rural character, historic features or wildlife.

7. Historic Environment

The importance of the historic environment in Rochford District is clearly identified within the Core Strategy document. Nevertheless, the policy guidance could be usefully enhanced to promote consideration and enhancement of the historic environment and use of the historic environment to shape place. This would be achieved by the following amendments to the Core Strategy,

- * Policy ENV1 (Protection and Enhancement of the Natural Landscape and Habitats and the Protection of Historical and Archaeological Sites) should be amended by deletion of the final sentence and its replacement with, 'The Council is committed to the protection, promotion and enhancement of the diverse historic landscape and extensive surviving archaeological deposits of the District.'

Core Strategy Submission Document

S - 16687 - 9072 - Policy H2 - Extensions to residential envelopes and phasing - None

16687 Support

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

* Paragraph 8.15 of the supporting text should be amended to better support the suggested amendment to Policy ENV1. The existing text of Paragraph 8.15 should be deleted in its entirety and replaced by,
The historic environment of Rochford District has developed through a history of human activity that spans over 450,000 years. Much of the resource lies hidden beneath the ground in the form of archaeological deposits. Other elements such as the historic landscape, the pattern of field, farms, woods and grazing marsh which characterise the District, are a highly visible record of millennia of agriculture, industry and commerce. Of particular significance are the coastal, island and estuarine areas where multi-period landscapes reflecting the exploitation of coastal and marshland resource survive. The District also includes the important historic medieval market towns of Rochford and Rayleigh.

* Page 16 (Sustainable Community Strategy Priority: Promoting a Greener District) should be amended to further support the approach to the Historic Environment. The fourth bullet of the Key Section/Policies of the Core Strategy should be amended to include the word 'historic', so that the first sentence of the bullet would read,
The Environment chapter seeks to protect and enhance the biodiversity, historic and natural environment of the District by protecting sites of local, national and international importance.

8. Community Infrastructure

The approach to Community Infrastructure is supported. The County Council would wish to work with the District Council to ensure that future community infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

In addition, it should be noted that,

* Some County Council services are not highly visible despite being regarded as highly desirable community services by local residents. The need to ensure adequate funding and contributions to enable these services to meet community expectations should be recognised and acknowledged in consideration of planning obligations and standard charges.

* The Adult Community Learning Centre at Rocheway, Rochford could be better located with regard to the wider Rochford/Castle Point area of service. Relocation of the Centre could provide opportunities both at the new location and for the current site.

* The Core Strategy should make specific reference to,

o Appendix H1, Location at South Canewdon: new Early Years and Childcare facilities;

o Policy CLT2, final sentence: insert after the words 'primary schools' the words 'and Early Years and Childcare facilities';

o Appendix CLT1, Other issues/comment: for Early years and childcare facilities add 'Land to be allocated within new residential areas, as appropriate'.

9. Implementation, Delivery and Monitoring

The inclusion in the Core Strategy of a section considering Implementation, Delivery and Monitoring is welcomed and supported. Nevertheless, the District Council, in moving towards implementation and delivery of the individual elements of the Core Strategy, should highlight those schemes and projects that are critical to achievement of other aspects of the Strategy.

Further, the monitoring proposal for Policy H6 (Lifetime Homes) and for Policy CP1 (Design) should be amended,

* Policy H6 (Lifetime Homes) - the identified monitoring tool is Core Indicator H6 Housing Quality Building for Life Assessments. The Building for Life Assessment methodology was devised to measure the overall design/layout quality of housing developments. It was not devised to measure compliance with Lifetime Homes, which is largely, but not exclusively, concerned with internal space standards and the provision of internal arrangements within dwellings to meet needs of all residents.

* Policy CP1 (Design) - the monitoring indicator proposed by the Core Strategy is not supported because it is unclear what the indicator would actually be measuring. The proposed indicator should be replaced by the Core Indicator, Housing Quality - Building for Life Assessments, as suggested by the County Council in its response to the Core Strategy Preferred Options, October 2008. A better approach would be to base evaluation and monitoring of Policy CP1 on the Commission for Architecture and the Built Environment's (CABE) 20 Building for Life principles, particularly as Government has endorsed these principles and is urging local authorities to use them to assess design quality. It is suggested that the monitoring arrangements for Preferred Option CP1 be deleted and replaced by the following text, 'The success of the implementation of this policy will be monitored by assessing schemes, or an appropriate sample of schemes, against the Commission for Architecture and the Built Environment's (CABE) Building for Life principles.'

10. Access to Housing

The Core Strategy notes the higher prevalence of older people in Rochford District and the need to support them. However, a more broadly based approach to access to housing should be adopted by Policies H4, H5 and H6. It should recognise the presence of other vulnerable adults in the community, for example, those with learning or mental health disability, and the range of possible forms of accommodation, including supported, sheltered and extra care accommodation. The high level of owner occupation in the District further emphasises the need for a broader approach. The emphasis on Lifetime Homes would not address the variety of future needs, whilst the potential exemptions to the

Core Strategy Submission Document

S - 16687 - 9072 - Policy H2 - Extensions to residential envelopes and phasing - None

16687 Support

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Summary: Lifetime Homes policy standard in Policy H6 are likely to act against demographic trends. Within Policy H2 (Extensions to residential envelopes and phasing) and Policy H3 (Extension to residential envelopes post-2021) the District Council has adopted a balanced approach to the distribution of additional housing locations, which is based on identification of tiers of settlements defined by reference to their accessibility to jobs, services and facilities (some of which lie outside the District) and the need to protect the valued environments within the District. This approach is generally supported, although implementation and delivery of individual schemes should give further thought to securing sustainable functional relationships between proposed development locations and availability of jobs, services and facilities.

The proposed scale and phasing of development at each of the identified locations in Policy H2 and Policy H3 should be capable of being supported by County Council service groups, provided that adequate and timely funding is available. The County Council would wish to work with the District Council to ensure that future infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16705 - 14242 - Policy H2 - Extensions to residential envelopes and phasing - i

16705 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mrs S P Lanham [14242]

33 Briar Close
Hawkwell
Hockley
Essex
SS5 4HD

Agent: N/A

Full Text: Re: Objection to Rochford Core Strategy 175 Houses in Hawkwell is Unsound

The proposal in the Rochford Core Strategy for this many houses in the Ward of Hawkwell West in UNSOUND because the vital requirements of the Government's Planning Policy are not met in terms of sustainability, and, therefore, the location of Hawkwell West (South Hawkwell) should be removed by The Inspector and the allocation moved to a sustainable location. In summary the reasons that development in this location is unsustainable under the Planning Policy are as follows:

Travel

Limited public transport - one bus an hour
Increase car use causing heavy congestion - main road through Hawkwell is almost at its full capacity
Inability to improve highways - attended recent meeting involving Highways Department, there is no improvements to local roads in the foreseeable future
Distance from the shops
Distance from rail stations

Environment

Semi rural location unsuitable for large development
Complete loss of character - Hawkwell is a village, let's keep it a village.
Loss of green belt - green areas should be maintained so that the next generation can enjoy it as we have
Loss of wildlife - an area frequented by badgers, foxes and hawks
No social, economic or environmental benefits whatsoever

Further development in Hawkwell West does not comply to the Core Strategy because the criteria is that a development is located in an area where alternatives to car use are more viable, reducing the requirement to travel. There is no space for development of local roads, especially in Rectory Road and any development here would increase the requirement to travel, especially by car.

Finally, such a large-scale development would lead to an unwelcome strip coalescence of built settlements, which is not in line with the Council policy.

Summary: The proposal in the Rochford Core Strategy for this many houses in the Ward of Hawkwell West in UNSOUND because the vital requirements of the Government's Planning Policy are not met in terms of sustainability. In summary the reasons that development in this location is unsustainable under the Planning Policy are as follows:

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Change to Plan The location of Hawkwell West (South Hawkwell) should be removed by The Inspector and the allocation moved to a sustainable location

Core Strategy Submission Document

O - 16705 - 14242 - Policy H2 - Extensions to residential envelopes and phasing - i

16705 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16706 - 14243 - Policy H2 - Extensions to residential envelopes and phasing - i

16706 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr C E Lanham [14243]

33 Briar Close
Hawkwell
Hockley
Essex
SS5 4HD

Agent: N/A

Full Text:

Re: Objection to Rochford Core Strategy 175 Houses in Hawkwell is Unsound
The proposal in the Rochford Core Strategy for this many houses in the Ward of Hawkwell West in UNSOUND because the vital requirements of the Government's Planning Policy are not met in terms of sustainability, and, therefore, the location of Hawkwell West (South Hawkwell) should be removed by The Inspector and the allocation moved to a sustainable location. In summary the reasons that development in this location is unsustainable under the Planning Policy are as follows:

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Increase car use causing heavy congestion - main road through Hawkwell is almost at its full capacity

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Distance from the shops

Distance from rail stations

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Finally, such a large-scale development would lead to an unwelcome strip coalescence of built settlements, which is not in line with the Council policy.

Change to Plan

The location of Hawkwell West (South Hawkwell) should be removed by The Inspector and the allocation moved to a sustainable location

Core Strategy Submission Document

O - 16706 - 14243 - Policy H2 - Extensions to residential envelopes and phasing - i

16706 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16708 - 8685 - Policy H2 - Extensions to residential envelopes and phasing - i, iii

16708 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Ms C Dutton [8685]

84 Thorpe Road
Hawkwell
Essex
SS5 4JT

Agent: N/A

Full Text: Re: Public Consultation - LDF Core Strategy

I wish to register my objections to the proposal to build 175 houses in South Hawkwell (which does not exist and is in fact Hawkwell West), on the grounds that it is unsound and legally incompliant with the Council's own Core Strategy and the Government's PPS12 Policy for the following reasons:

Travel

The Core Strategy says 'locate development in areas where alternatives to car use are more viable', 'reduce the requirement to travel', and accompany any development with requisite highway infrastructure to 'mitigate their impact on the existing network'. It is not possible to do this in Hawkwell West as there is not space for development of local roads, especially in Rectory Road, and any development here would increase the requirement to travel, especially by car. Moving on to Public Transport the Core Strategy states that 'planning should be well related to existing public transport where possible'. There is just one bus to and from Southend/Rayleigh per hour with no prospect of Arriva providing an appropriate service in the long term.

I am told Essex County Council has already acknowledge concern with regard to the bottleneck at the railway bridge at St Mary's Church where additional traffic from other proposed developments in the District will 'rate run' to and from the B1013.

In Short:

- Limited public transport
- Increased car use causing heavy congestion
- Inability to improve highways
- Distance from shops
- Distance from rail stations

Environment

The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of the existing settlement in Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West. This development, if it is to be off Rectory Road, will cause the urban coalescence of Hockley to Ashingdon via Hawkwell, surely this is not in line with spatial planning.

In Short:

- Semi rural location unsuitable for large development
- Complete loss of character
- Loss of green belt
- Loss of wildlife (I note the Environmental Report does not mention Muntjack deer located on the site)
- NO social, economic or environmental benefits whatsoever

I believe locations for development are based on the 'Call for Sites'. Surely locations should be based on the sustainability criteria within PPS12 and not on something that suits landowners? The proposal in the Rochford Core Strategy for this many houses in the Ward of Hawkwell West is UNSOUND because the vital requirements of PPS12 are not met in terms of sustainability, and therefore the location of Hawkwell West should be removed by The Inspector and the allocation moved to a sustainable location.

Summary: Re: Public Consultation - LDF Core Strategy

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Core Strategy Submission Document

O - 16708 - 8685 - Policy H2 - Extensions to residential envelopes and phasing - i, iii

16708 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

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In Short:

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- Increased car use causing heavy congestion
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- Distance from shops
- Distance from rail stations

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The Core Strategy talks about protecting the character of existing settlements and specifically 'seeks to take advantage of development opportunities that will provide social, economic and environmental benefits'. No such benefits would apply to this location and development would be materially detrimental to the character of the existing settlement in Hawkwell West. It also states 'there is a limit to how much infilling and intensification existing settlements can sustain without their character being adversely affected'. This limit has already been exceeded in Hawkwell West. This development, if it is to be off Rectory Road, will cause the urban coalescence of Hockley to Ashingdon via Hawkwell, surely this is not in line with spatial planning.

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Appear at exam? Not Specified **Soundness Tests** i, iii

Core Strategy Submission Document

O - 16725 - 10008 - Policy H2 - Extensions to residential envelopes and phasing - i

16725 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr J Robinson [10008]

Canewdon Hall Farm
Canewdon
Essex
SS4 3QW

Agent: N/A

Full Text: We are supportive that the council have identified housing provision with Canewdon. It is considered that this location is sustainable due to its location adjacent to the existing village. The provision of development in this location will enable existing village facilities to be supported and retained. Furthermore there is sufficient adjacent to the village to provide comprehensive development.

The change we would like to see is that policy H2 is altered to refer to North West Canewdon or simply Canewdon. It is considered development can be better located on Brownfield site of the farm yard and waste ground rather than Greenfield sites. Development in this location will be constrained by the existing contours of the land. The allocation of land will be further considered in the Allocations Document following the SHLAA and as such the reference to Canewdon within the Core Strategy should be less site specific within this general strategy.

Summary: We are supportive that the council have identified housing provision with Canewdon. It is considered that this location is sustainable due to its location adjacent to the existing village. The provision of development in this location will enable existing village facilities to be supported and retained. Furthermore there is sufficient adjacent to the village to provide comprehensive development.

Change to Plan The change we would like to see is that policy H2 is altered to refer to North West Canewdon or simply Canewdon. It is considered development can be better located on Brownfield site of the farm yard and waste ground rather than Greenfield sites. Development in this location will be constrained by the existing contours of the land. The allocation of land will be further considered in the Allocations Document following the SHLAA and as such the reference to Canewdon within the Core Strategy should be less site specific within this general strategy.

Appear at exam? No

Soundness Tests i

Core Strategy Submission Document

O - 16739 - 10076 - Policy H2 - Extensions to residential envelopes and phasing - i

16739 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr L A Norris [10076]

384 Rectory Road
Hawkwell
Essex
SS5 4JU

Agent: N/A

Full Text:

I submit herewith my objections to this Council's core strategy concerning future development of 175 houses in Hawkwell West.
In response to the proposal to build 175 (core strategy) or 30 (planning request Wilson homes) new homes off of Rectory Road Hawkwell. I find the proposal absolutely horrifying, totally insensitive to, out of keeping with, and a blot on the landscape for, the area proposed.

This proposed development is totally UNSOUND in my opinion for the following reasons. The infrastructure of the area will not sustain the influx of 1200+ people, our schools are already full and desperately short of teachers, there is only one NHS dentist with a huge waiting list and since the death of Dr Sen his Rochford and Hawkwell surgeries have been manned by locums as no full time Doctor can be found, in fact the Hawkwell surgery is to be closed for this reason. Our water pressure is limp to say the least, and there are on average 2 power cuts a year, after any kind of heavy rain the junction of Rectory Road and main road floods as the drain cannot take the flow. As for Rectory Road it is already struggling with the extra demand of traffic from Ashingdon cutting through to Cherry Orchard way and the A127. The approach from Rayleigh down Main Road past the Spa PH is a nightmare already and very often backs up from the Spa PH to Bullwood Hall. Ashingdon Road is a no go zone at school drop off/pick up times as are the roads around greensward academy/Hockley station area. These roads cannot cope with an additional 500+ cars and as far as I can see the only pathetic suggested remedy, is to widen the junction of Rectory Road and Main Road to allow 2 exits lanes, as this widening of the junction only goes a few metres it will do absolutely nothing to alleviate congestion at this junction, and what of return journeys into Rectory Road?

There is also a question of employment, we have a gross lack of local employment, and it therefore follows that the majority of the people moving into these homes will have to commute.

As for the land itself, much of it is green belt, so designated to stop exactly this kind of urban sprawl proposed. There is an area of trees to the rear of my property covered by a preservation order; I was told by one of "WILSON HOMES" representatives that some of the main substantive ones will be kept.

They "ALL" have a preservation order and they "ALL" must be kept.

I was told if they have an order they would be. However, I know darn well that if they are in the way, and they will be, they will just cut them down one dark night and pay the fine accepting it as a mild irritation.

And without a care for the environment or the wildlife these wooded areas support.

To summarise:

- We have limited public transport
- There will be increased car use causing heavy congestion
- An inability to improve highways
- An unwalkable distance from shops and railway
- This is a semi rural area unsuitable for large development which will suffer complete loss of character
- There will be a loss of wild life and habitat
- A loss of green belt
- No social, economic or environmental benefit
- There is also a limit to the infilling and intensification an existing settlement can sustain, a limit already exceeded n Hawkwell west
- All of these items are key to the core strategy

Finally

This proposal will completely change the environment in which I live and love. I do not want to live bordered on 3 sides by a huge housing estate and

On the fourth side by a really busy road with all the noise and pollution it will produce. I do not want to live through years of construction noise, and vehicles thundering past my house covering the road with mud and my house and garden in dust.

I ask you to reject this proposal

Summary:

To summarise:
We have limited public transport
There will be increased car use causing heavy congestion
An inability to improve highways
An unwalkable distance from shops and railway

Core Strategy Submission Document

O - 16739 - 10076 - Policy H2 - Extensions to residential envelopes and phasing - i

16739 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

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On the fourth side by a really busy road with all the noise and pollution it will produce. I do not want to live through years of construction noise, and vehicles thundering past my house covering the road with mud and my house and garden in dust.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16740 - 7423 - Policy H2 - Extensions to residential envelopes and phasing - i

16740 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Hawkwell Residents Association (Mrs A Heath) **Agent:** N/A
[7423]

Hawkwell Residents Association
2 Englefield Close
Hawkwell
Essex
SS5 4LE

Full Text: The Hawkwell Residents Association has discussed the RDC Core Strategy Submission document and wishes to object on the grounds of unsoundness or legally non compliant due to the following points:

- Producing a heavy weight document that prevented printing and general distribution was an unfair method of consultation.
 - This document does not fully take into consideration the impact of the JAAP report and the reports for the proposed redevelopment of Hockley, Rochford and Rayleigh.
 - The stated government policy of using 60% brown field sites first before green field seems to have been reversed, with many potential sites for building being of a green field nature.
 - If the 175 homes were to be located in one place it will change the nature of the village. We believe it would be better to spread them throughout the Hawkwell area. Consideration should be given to the proximity of shops and schools as due to the lack of public transport additional car usage would result.
 - That comprehensive consultation has not taken place with ECC, other district councils, local parish/town councils, residents associations and other interested parties in and around our district.
 - The additional homes will put an enormous strain on the infrastructure of our area, particularly the road system, which has not been addressed in the document.
 - Loss of Green Belt in our area, which would change our village into a town.
 - Additional vehicles on the roads from the building of the new homes, the additional residents, their delivery services and visitors and the proposed airport expansion traffic.
 - Additional demand on our doctors and dentists.
 - Additional demand on schools and social services.
 - The number 7 and 8 bus has now been reduced to mainly one bus an hour and there is now no evening number 8 service.
 - Additional demand on gas, electric, telephone, water, sewers and surface/storm water drainage.
 - Moving Eldon Way and the Foundry Estate to a green belt site at the airport area will increase mileage for employees and the lack of public transport will limit employment to car users. We believe cycling would be a poor and unrealistic substitute.
 - ECC have stated that the B1013 is now running at 72% capacity. The Core Strategy proposal would bring the traffic to an unbearable level. No details and estimated costs are given of the many road improvement we believe would be necessary as listed below.
 - This area is enclosed by the River Crouch, the sea and the Thames and is only properly accessed from the west. For this reason we believe the sensible place to locate additional homes would be in the western part of Rochford district.
 - We believe that no major infrastructure improvements have been carried out in the Hawkwell area for more than 30 years. We also believe that the following infrastructure improvements in the Hawkwell/Hockley area, that are not included in the Core Strategy document, should be addressed before any additional homes are built:
1. Replacement of Rectory Road Railway Bridge for two-way traffic.
 2. Computer controlled traffic lights at the Rectory Road/Hal Road junction.
 3. Upgrade Rectory Road and widen road and footpath at the Christmas Tree Farm area.
 4. Upgrade the B1013 Hall Road and provide missing and upgrade existing pavements.
 5. Proper main road street lighting for the B1013 Hall Road and B1013 Rayleigh Road.
 6. A cycle path route from Rochford through Hockley to Rayleigh.
 7. A new pelican crossing in B1013 Main Road near Tudor Way.
 8. Return to two buses an hour in both directions for the 7 and 8 services between Southend and Rayleigh and the return of the 8 evening bus service.
 9. Improvements to all services including gas, electric, telephone, water, sewers and surface/storm water drainage.
 10. Increase capacity at all the local schools in the area.
 11. Increase capacity at all the local doctors and dentists and hospital services in the area.
 12. Increase ambulance, fire and police emergency services.
 13. Provide and run a youth club in the Hawkwell area.
 14. To provide and run allotments in the Hawkwell area.
 15. To extend the existing Cherry Orchard Park to Mount Bovers Lane and Hockley Woods.
 16. Replace the existing Hockley Spa roundabout with a wider traffic light junction complete with pedestrian cross lights.
 17. Install a double mini roundabout at Station Road and Station Approach junction with Spa Road for Hockley Station.
 18. Install a mini roundabout on the B1013 at Folly Lane.
 19. Make up/upgrade Plumberow Avenue through to Lower Road in Hockley complete with pavements, main road street lighting and a mini roundabout at the Lower Road junction.
 20. Upgrade Watery Lane/Beeches Road in Hullbridge from Lower Road complete with pavements, main road street lighting and a mini roundabout at the Lower Road junction.

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

Core Strategy Submission Document

16740 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Summary:

The Hawkwell Residents Association has discussed the RDC Core Strategy Submission document and wishes to object on the grounds of unsoundness or legally non compliant due to the following points:

- Producing a heavy weight document that prevented printing and general distribution was an unfair method of consultation.
- This document does not fully take into consideration the impact of the JAAP report and the reports for the proposed redevelopment of Hockley, Rochford and Rayleigh.
- The stated government policy of using 60% brown field sites first before green field seems to have been reversed, with many potential sites for building being of a green field nature.
- If the 175 homes were to be located in one place it will change the nature of the village. We believe it would be better to spread them throughout the Hawkwell area. Consideration should be given to the proximity of shops and schools as due to the lack of public transport additional car usage would result.
- That comprehensive consultation has not taken place with ECC, other district councils, local parish/town councils, residents associations and other interested parties in and around our district.
- The additional homes will put an enormous strain on the infrastructure of our area, particularly the road system, which has not been addressed in the document.
- Loss of Green Belt in our area, which would change our village into a town.
- Additional vehicles on the roads from the building of the new homes, the additional residents, their delivery services and visitors and the proposed airport expansion traffic.
- Additional demand on our doctors and dentists.
- Additional demand on schools and social services.
- The number 7 and 8 bus has now been reduced to mainly one bus an hour and there is now no evening number 8 service.
- Additional demand on gas, electric, telephone, water, sewers and surface/storm water drainage.
- Moving Eldon Way and the Foundry Estate to a green belt site at the airport area will increase mileage for employees and the lack of public transport will limit employment to car users. We believe cycling would be a poor and unrealistic substitute.
- ECC have stated that the B1013 is now running at 72% capacity. The Core Strategy proposal would bring the traffic to an unbearable level. No details and estimated costs are given of the many road improvement we believe would be necessary as listed below.
- This area is enclosed by the River Crouch, the sea and the Thames and is only properly accessed from the west. For this reason we believe the sensible place to locate additional homes would be in the western part of Rochford district.
- We believe that no major infrastructure improvements have been carried out in the Hawkwell area for more than 30 years.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

S - 16766 - 14253 - Policy H2 - Extensions to residential envelopes and phasing - None

16766 Support

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr M Purkiss [14253]

Hawkwell Hall Farm
Rectory Road
Hawkwell
Essex
SS5 4LL

Agent: N/A

Full Text:

We are supportive that the council have identified housing provision with Hawkwell. It is considered that this location is sustainable due to its close proximity to existing town centres. The provision of development in this location will enable highway infrastructure improvements which will ease current congestion. Existing previously developed sites existing within Hawkwell, (e.g. Magees Nurseries) offer opportunities for redevelopment of Brownfield land in line with government objectives. Furthermore there is sufficient adjacent land in this location to provide comprehensive development.

The change we would like to see is that policy H2 is altered to refer to North Hawkwell or generally to Hawkwell. It is considered development can be better constrained by the existing railway in the north of Hawkwell and will prevent sprawl to the south however this will be further considered in the Allocations Document. The reference to Hawkwell within the Core Strategy should be less site specific within this general strategy.

Summary:

We are supportive that the council have identified housing provision with Hawkwell. It is considered that this location is sustainable due to its close proximity to existing town centres. The provision of development in this location will enable highway infrastructure improvements which will ease current congestion. Existing previously developed sites existing within Hawkwell, (e.g. Magees Nurseries) offer opportunities for redevelopment of Brownfield land in line with government objectives. Furthermore there is sufficient adjacent land in this location to provide comprehensive development.

Change to Plan N/A

Appear at exam? No

Soundness Tests N/A

Core Strategy Submission Document

O - 16767 - 8144 - Policy H2 - Extensions to residential envelopes and phasing - iii

16767 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr & Mrs Plummer [8144]

Agent: N/A

Tufty Lodge
Church Road
Rawreth
Wickford
Essex
SS11 8SG
01268 574500

Full Text: Using green belt land north of London Road is contrary to the National Policy PPG62 Core Strategy Preferred Options page 42 GB1 Green Belt Protection page 55 Flood Risk Planning Policy Station 25 requires that flood risk is taken into account at all stages of the planning process page 56 managing risk.

Other brown field sites should be used instead.

Flooding has happened due to local Council and development now the environment has the problem PPS25 risk assessment should be assessed by an independent company on the problem that we take without directing more water into Zone 3 where we live.

Summary: Using green belt land north of London Road is contrary to the National Policy PPG62 Core Strategy Preferred Options page 42 GB1 Green Belt Protection page 55 Flood Risk Planning Policy Station 25 requires that flood risk is taken into account at all stages of the planning process page 56 managing risk.

Change to Plan Other brown field sites should be used instead.

Appear at exam? Yes

Soundness Tests iii

Core Strategy Submission Document

O - 16768 - 14171 - Policy H2 - Extensions to residential envelopes and phasing - i

16768 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr John Crawley [14171]

71 Temple Way
Rayleigh
Essex
SS6 9PP
UK
01268784346

Agent: N/A

Full Text: Core Strategy Submission Document - Rawreth

The local development framework which includes building 770 houses between London Road and Rawreth Lane. This plan is totally unsound for the following reasons:-

- i) We are a rural community, this development would double our population of Rawreth.
- ii) Productive farmland should not be allowed to be developed on. Food is going to be in serious short supply in the near future.
- iii) There are other Brownfield sites that can be used instead.
- iv) Building on this land will put unsustainable pressure on our B roads and amenities.
- v) We are unfortunate to have an Asda supermarket on our housing estate. We already suffer with noise from the lorries and refrigerated lorries, car alarms ringing in the car park. This development would double the amount of lorries into Asda and cars into the car park.
- vi) Please think how this will affect our lives.
- vii) Please put the existing residents health and welfare first.

Summary: The local development framework which includes building 770 houses between London Road and Rawreth Lane. This plan is totally unsound for the following reasons:-

- i) We are a rural community, this development would double our population of Rawreth.
- ii) Productive farmland should not be allowed to be developed on. Food is going to be in serious short supply in the near future.
- iii) There are other Brownfield sites that can be used instead.
- iv) Building on this land will put unsustainable pressure on our B roads and amenities.
- v) We are unfortunate to have an Asda supermarket on our housing estate. We already suffer with noise from the lorries and refrigerated lorries, car alarms ringing in the car park. This development would double the amount of lorries into Asda and cars into the car park.
- vi) Please think how this will affect our lives.
- vii) Please put the existing residents health and welfare first.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16769 - 9942 - Policy H2 - Extensions to residential envelopes and phasing - i

16769 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Sally McGinley [9942]

30 Hawkwell Park Drive
Hawkwell
Hockley
Essex
SS5 4HB

Agent: N/A

Full Text:

I am writing to object to Rochford's Core Strategy for 175 houses in Hawkwell which I believe is unsound.

The proposal in the Rochford Core Strategy for this many houses in the Ward of Hawkwell West is unsound because the vital requirements of the Government's planning policy are not met in terms of sustainability, and therefore the Hawkwell West (South Hawkwell) should be removed by the inspector and the allocation moved to a sustainable location.

In summary I object to this application for the following reasons.

1. Increased congestion on roads. The B1013 and surrounding feeder roads are already nearing their safe maximum capacity.
2. Inability to improve highways. The current road ways cannot accommodate the increased traffic without significant widening and improvements.
3. Distance from shops. There are no shops located within walking distance of this development.
4. Limited public transport. The current bus service is poor and Arriva have no plans to improve it.
5. Distance from railway station. Distance to the railway station and the lack of public transport will only encourage the use of private cars.
6. Semi-rural location unsuitable for large scale development. Any large scale development would mean a continuous coalescence of development between Hockley and Ashingdon via Hawkwell with the subsequent loss of community identity.
7. Loss of green belt. It is the council's duty to protect Green Belt from development at all cost. Brown field sites should always be preferable.
8. Loss of wild life. Wildlife diversity in the area will be reduced and the loss of habitat will almost certainly see the extermination of Muntjac deer in the area.
9. Loss of character. Rochford District Council has a duty to promote healthy communities and maintain the character of the area.
10. No social economic or environmental benefits.
11. Drainage system is not built for more housing.

Summary:

The proposal in the Rochford Core Strategy for this many houses in the Ward of Hawkwell West is unsound because the vital requirements of the Government's planning policy are not met in terms of sustainability, and therefore the Hawkwell West (South Hawkwell) should be removed by the inspector and the allocation moved to a sustainable location.

In summary I object to this application for the following reasons.

1. Increased congestion on roads. The B1013 and surrounding feeder roads are already nearing their safe maximum capacity.
2. Inability to improve highways. The current road ways cannot accommodate the increased traffic without significant widening and improvements.
3. Distance from shops. There are no shops located within walking distance of this development.
4. Limited public transport. The current bus service is poor and Arriva have no plans to improve it.
5. Distance from railway station. Distance to the railway station and the lack of public transport will only encourage the use of private cars.
6. Semi-rural location unsuitable for large scale development. Any large scale development would mean a continuous coalescence of development between Hockley and Ashingdon via Hawkwell with the subsequent loss of community identity.
7. Loss of green belt. It is the council's duty to protect Green Belt from development at all cost. Brown field sites should always be preferable.
8. Loss of wild life. Wildlife diversity in the area will be reduced and the loss of habitat will almost certainly see the extermination of Muntjac deer in the area.
9. Loss of character. Rochford District Council has a duty to promote healthy communities and maintain the character of the area.
10. No social economic or environmental benefits.
11. Drainage system is not built for more housing.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16770 - 13710 - Policy H2 - Extensions to residential envelopes and phasing - i, ii, iii

16770 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr Trevor William Wiggins [13710]

395 Little Wakering Road
Barling Magna

SS3 0GA

Agent: Key Architectural (Mr T A Key) [7517]

Key Architectural
33 Lingfield Drive
Rochford
Essex

SS4 1DZ

01702 546286

Full Text: See attached sheet

Council reference AE01

Summary: See statement

Council ref AE01

Change to Plan

Appear at exam? No

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 16771 - 14255 - Policy H2 - Extensions to residential envelopes and phasing - i, ii, iii

16771 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr D Wilson [14255]

Not provided as contact through agent -

Mr T Key
Key Architectural

Agent: Key Architectural (Mr T A Key) [7517]

Key Architectural
33 Lingfield Drive
Rochford
Essex
SS4 1DZ
01702 546286

Full Text: See statement
Council ref AE02

Summary: See statement
Council ref AE02

Change to Plan See statement
Council ref AE02

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16772 - 14255 - Policy H2 - Extensions to residential envelopes and phasing - i, ii, iii

16772 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr D Wilson [14255]

Not provided as contact through agent -

Mr T Key
Key Architectural

Agent: Key Architectural (Mr T A Key) [7517]

Key Architectural
33 Lingfield Drive
Rochford
Essex
SS4 1DZ
01702 546286

Full Text: See statement
Council ref AE03

Summary: See statement
Council ref AE03

Change to Plan See statement
Council ref AE03

Appear at exam? Not Specified **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16773 - 14256 - Policy H2 - Extensions to residential envelopes and phasing - i, ii, iii

16773 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr L Bell [14256]

Not provided. Contact through agent -

Mr T Key
Key Architectural

Agent: Key Architectural (Mr T A Key) [7517]

Key Architectural
33 Lingfield Drive
Rochford
Essex
SS4 1DZ
01702 546286

Full Text: See statement
Council ref AE04

Summary: See statement
Council ref AE04

Change to Plan See statement
Council ref AE04

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16790 - 14257 - Policy H2 - Extensions to residential envelopes and phasing - i, ii, iii

16790 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr G Bradley [14257]

Not provided - contact through agent -

Mr T Key
Key Architectural

Agent: Key Architectural (Mr T A Key) [7517]

Key Architectural
33 Lingfield Drive
Rochford
Essex
SS4 1DZ
01702 546286

Full Text: See statement
Council ref AE05

Summary: See statement
Council ref AE05

Change to Plan See statement
Council ref AE05

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16791 - 14256 - Policy H2 - Extensions to residential envelopes and phasing - i, ii, iii

16791 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr L Bell [14256]

Not provided. Contact through agent -

Mr T Key
Key Architectural

Agent: Key Architectural (Mr T A Key) [7517]

Key Architectural
33 Lingfield Drive
Rochford
Essex
SS4 1DZ
01702 546286

Full Text: See statement
Council ref AE06

Summary: See statement
Council ref AE06

Change to Plan See statement
Council ref AE06

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16792 - 14258 - Policy H2 - Extensions to residential envelopes and phasing - i, ii, iii

16792 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr J Collins [14258]

Not provided, contact via agent -

Mr T Key
Key Architectural

Agent: Key Architectural (Mr T A Key) [7517]

Key Architectural
33 Lingfield Drive
Rochford
Essex
SS4 1DZ
01702 546286

Full Text: See statement
Council ref AE07

Summary: See statement
Council ref AE07

Change to Plan See statement
Council ref AE07

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16793 - 14259 - Policy H2 - Extensions to residential envelopes and phasing - i, ii, iii

16793 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr A Bridge [14259]

Not provided, contact via agent -

Mr T Key
Key Architectual

Agent: Key Architectural (Mr T A Key) [7517]

Key Architectural
33 Lingfield Drive
Rochford
Essex
SS4 1DZ
01702 546286

Full Text: See statement
Council ref AE08

Summary: See statement
Council ref AE08

Change to Plan See statement
Council ref AE08

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16794 - 8496 - Policy H2 - Extensions to residential envelopes and phasing - i, ii, iii

16794 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr N Collis [8496]

Briardene
Ethelbert Road
Ashingdon
Essex
SS4 3JS
01702 203698

Agent: Key Architectural (Mr T A Key) [7517]

Key Architectural
33 Lingfield Drive
Rochford
Essex
SS4 1DZ
01702 546286

Full Text: See statement
Council ref AE09

Summary: See statement
Council ref AE09

Change to Plan See statement
Council ref AE09

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16795 - 14259 - Policy H2 - Extensions to residential envelopes and phasing - i, ii, iii

16795 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr A Bridge [14259]

Not provided, contact via agent -

Mr T Key
Key Architectual

Agent: Key Architectural (Mr T A Key) [7517]

Key Architectural
33 Lingfield Drive
Rochford
Essex
SS4 1DZ
01702 546286

Full Text: See statement
Council ref AE10

Summary: See statement
Council ref AE10

Change to Plan See statement
Council ref AE10

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16796 - 14261 - Policy H2 - Extensions to residential envelopes and phasing - i, ii, iii

16796 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr E Coe [14261]

None provided, contact via agent -

Mr T Key
Key Architectural

Agent: Key Architectural (Mr T A Key) [7517]

Key Architectural
33 Lingfield Drive
Rochford
Essex
SS4 1DZ
01702 546286

Full Text: See statement
Council ref AE11

Summary: See statement
Council ref AE11

Change to Plan See statement
Council ref AE11

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16797 - 14262 - Policy H2 - Extensions to residential envelopes and phasing - i, ii, iii

16797 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr J Caiger [14262]

Not provided, contact via agent -

Mr T Key
Key Architectural

Agent: Key Architectural (Mr T A Key) [7517]

Key Architectural
33 Lingfield Drive
Rochford
Essex
SS4 1DZ
01702 546286

Full Text: See statement
Council ref AE12

Summary: See statement
Council ref AE12

Change to Plan See statement
Council ref AE12

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16798 - 14255 - Policy H2 - Extensions to residential envelopes and phasing - i, ii, iii

16798 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr D Wilson [14255]

Not provided as contact through agent -

Mr T Key
Key Architectural

Agent: Key Architectural (Mr T A Key) [7517]

Key Architectural
33 Lingfield Drive
Rochford
Essex
SS4 1DZ
01702 546286

Full Text: See statement
Council ref AE13

Summary: See statement
Council ref AE13

Change to Plan See statement
Council ref AE13

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16799 - 14263 - Policy H2 - Extensions to residential envelopes and phasing - i, ii, iii

16799 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mrs C Vidler and M Wilson [14263]

Note provided, contact via agent -

Mr T Key
Key Architectural

Agent: Key Architectural (Mr T A Key) [7517]

Key Architectural
33 Lingfield Drive
Rochford
Essex
SS4 1DZ
01702 546286

Full Text: See statement

Council ref AE14

Summary: See statement

Council ref AE14

Change to Plan See statement

Council ref AE14

Appear at exam? No

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 16800 - 14263 - Policy H2 - Extensions to residential envelopes and phasing - i, ii, iii

16800 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mrs C Vidler and M Wilson [14263]

Note provided, contact via agent -

Mr T Key
Key Architectural

Agent: Key Architectural (Mr T A Key) [7517]

Key Architectural
33 Lingfield Drive
Rochford
Essex
SS4 1DZ
01702 546286

Full Text: See statement

Council ref AE15

Summary: See statement

Council ref AE15

Change to Plan See statement

Council ref AE15

Appear at exam? No

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 16801 - 14264 - Policy H2 - Extensions to residential envelopes and phasing - i, ii, iii

16801 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr B Maczka [14264]

Not provided, contact via agent -

Mr T Key
Key Architectural

Agent: Key Architectural (Mr T A Key) [7517]

Key Architectural
33 Lingfield Drive
Rochford
Essex
SS4 1DZ
01702 546286

Full Text: See statement
Council ref AE16

Summary: See statement
Council ref AE16

Change to Plan See statement
Council ref AE16

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16802 - 9160 - Policy H2 - Extensions to residential envelopes and phasing - i, iii

16802 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr & Mrs Weir [9160]

18 Glenwood Avenue
Hawkwell
Hockley
Essex
SS5 4HH
01702 207764

Agent: N/A

Full Text: We wish to object to the above strategy as submitted because its not sound.

1. The Hockley town centre, Rochford town centre, Rayleigh town centre action plans have not been completed and the Jaap report has still not been finalised. There could be a planning inquiry into the planning application for the expansion of London Southend airport. That could well put in doubt the assumptions for employment growth predicted in the strategy. Also the site allocation document has not been released. The Housing allocation for West Hawkwell which is listed as South Hawkwell in the plan is not sound. It does not meet PPS12 (even at the reduced housing units to 175) for sustainability. There is limited public transport, resulting increased use of the car, heavy congestion, together with the inability to improve highways sufficiently to alleviate problems at junctions. The combination of the sites for West Rochford Ashingdon and Hockley will contribute to congestion on Hall Road Ashingdon Road and Rectory Road.

The distance from shops schools and train stations. The loss of trees hedges and greenbelts. The loss of character of the rural part of west Hawkwell. We believe that West Hawkwell/South Hawkwell allocation should be removed from the plan because the housing allocation will provide no social economic benefit. The Council says Rayleigh is the most suitable place for development but are not proposing any new development sites to be released prior to 2015.

The government's policy of 60% brownfield sites, and 40% greenbelt sites has not been met. Most of the housing and employment land proposed is in the greenbelt.

The proposed sites for housing and employment are unsound because their development, relies on relocation of industrial units to new sites to allow for housing on existing employment, relies on relocation of industrial units to new sites to allow for housing on existing employment sites.

For the above reasons we believe that the core strategy submission document is unsound.

Summary:

1. The Hockley town centre, Rochford town centre, Rayleigh town centre action plans have not been completed and the Jaap report has still not been finalised. There could be a planning inquiry into the planning application for the expansion of London Southend airport. That could well put in doubt the assumptions for employment growth predicted in the strategy. Also the site allocation document has not been released. The Housing allocation for West Hawkwell which is listed as South Hawkwell in the plan is not sound. It does not meet PPS12 (even at the reduced housing units to 175) for sustainability. There is limited public transport, resulting increased use of the car, heavy congestion, together with the inability to improve highways sufficiently to alleviate problems at junctions. The combination of the sites for West Rochford Ashingdon and Hockley will contribute to congestion on Hall Road Ashingdon Road and Rectory Road.

The distance from shops schools and train stations. The loss of trees hedges and greenbelts. The loss of character of the rural part of west Hawkwell. We believe that West Hawkwell/South Hawkwell allocation should be removed from the plan because the housing allocation will provide no social economic benefit. The Council says Rayleigh is the most suitable place for development but are not proposing any new development sites to be released prior to 2015.

The government's policy of 60% brownfield sites, and 40% greenbelt sites has not been met. Most of the housing and employment land proposed is in the greenbelt.

The proposed sites for housing and employment are unsound because their development, relies on relocation of industrial units to new sites to allow for housing on existing employment, relies on relocation of industrial units to new sites to allow for housing on existing employment sites.

For the above reasons we believe that the core strategy submission document is unsound.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i, iii

Core Strategy Submission Document

O - 16803 - 14255 - Policy H2 - Extensions to residential envelopes and phasing - i, ii, iii

16803 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr D Wilson [14255]

Not provided as contact through agent -

Mr T Key
Key Architectural

Agent: Key Architectural (Mr T A Key) [7517]

Key Architectural
33 Lingfield Drive
Rochford
Essex
SS4 1DZ
01702 546286

Full Text: See statement
Council ref AE17

Summary: See statement
Council ref AE17

Change to Plan See statement
Council ref AE17

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16825 - 8075 - Policy H2 - Extensions to residential envelopes and phasing - i, ii

16825 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr Dudley Ball [8075]

Westview
Church Road
Hockley
Essex

SS5 4SS

Agent: Edward Gittins & Associates (Mr Edward Gittins) [8074]

Edward Gittins & Associates
The Mount
Huxtables Lane
Fordham Heath
Colchester
Essex

CO3 9TJ

01206 240321

Full Text: See attached representations

Council ref AE20

Summary: See attached representations

Council ref AE20

Change to Plan See attached representations

Council ref AE20

Appear at exam? Yes

Soundness Tests i, ii

Core Strategy Submission Document

O - 16828 - 8076 - Policy H2 - Extensions to residential envelopes and phasing - i, ii

16828 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Crowstone Properties Ltd. [8076]

Crowstone Properties Ltd.
c/o The Agent

CO3 9TJ

Agent: Edward Gittins & Associates (Mr Edward Gittins) [8074]

Edward Gittins & Associates
The Mount
Huxtables Lane
Fordham Heath
Colchester
Essex

CO3 9TJ

01206 240321

Full Text:

See attached representations

Council ref AE21

Summary:

See attached representations

Council ref AE21

Change to Plan

See attached representations

Council ref AE21

Appear at exam? Yes

Soundness Tests i, ii

Core Strategy Submission Document

O - 16835 - 9912 - Policy H2 - Extensions to residential envelopes and phasing - i, ii, iii

16835 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: M D Smith & Son [9912]

M D Smith & Son
Hambro Nurseries
Chelmsford Road
Battlesbridge
Wickford
SS11 8SY

Agent: Andrew Martin Associates Ltd (Mr David Maxwell)
[9911]

Andrew Martin Associates Ltd
Croxtan's Mill
Little Waltham
Chelmsford
Essex
CM3 3PJ
01245 361611

Full Text: Policy H2 is unsound as it is unjustified, ineffective and contrary to government policy.

Policy H2 provides for the major release of several Greenfield sites that fall within areas protected by Green Belt policies. Land North of London Road, Rayleigh is identified to deliver some 550 dwellings. This land is at risk of flooding and/or development of this land is likely to significantly increase flooding at Rawreth Brook and Church Road.

Supporting document received Council ref AE23

Detailed flood risk assessment must be carried out, prior to possible identification of the site in the Core Strategy, to ascertain the flood risks arising from development of this land.

Policy H2 should also be amended to delete, or reduce the quantum of residential identified at London Road, Rayleigh. Hambro Nursery and Clovelly Works should be identified as a suitable and sustainable site for redevelopment of up to 90 dwellings (see attached brochure).

Summary:

Policy H2 is unsound as it is unjustified, ineffective and contrary to government policy.

Policy H2 provides for the major release of several Greenfield sites that fall within areas protected by Green Belt policies. Land North of London Road, Rayleigh is identified to deliver some 550 dwellings. This land is at risk of flooding and/or development of this land is likely to significantly increase flooding at Rawreth Brook and Church Road.

Supporting document received Council ref AE23

Change to Plan Detailed flood risk assessment must be carried out, prior to possible identification of the site in the Core Strategy, to ascertain the flood risks arising from development of this land.

Policy H2 should also be amended to delete, or reduce the quantum of residential identified at London Road, Rayleigh. Hambro Nursery and Clovelly Works should be identified as a suitable and sustainable site for redevelopment of up to 90 dwellings (see attached brochure).

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

16848 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Environment Agency (Miss Carrie Williams) [9889] **Agent:** N/A

Environment Agency
Iceni House
Cobham Road
Ipswich
Suffolk
IP3 9JD
United Kingdom
01473 706007

Full Text: The background evidence includes the Essex Thames Gateway Water Cycle Study Scoping Report carried out by Scott Wilson and completed in March 2009 however the findings of this report have failed to be captured in the policies of the Core Strategy (with the exception of the water efficiency requirements related to the Code for Sustainable Homes in Policy ENV9).

The Scoping Report identifies that in terms of water resources, Essex and Suffolk Water are currently operating at a demand-supply deficit during dry years and that, although the approval of the Abberton reservoir scheme will largely alleviate these problems in the future, the deficit will remain until this scheme comes online in 2014. The Scoping Report therefore recommends that, as well as seeking high levels of water efficiency in new and existing developments, new development is phased up to 2014.

In addition to the water resources issue, the Scoping Study also that there are some potential capacity issues with both the Rochford Wastewater treatment works (WwTW) and the sewerage network associated with it which would need resolving around 2015. There might also be some issues with the quality of discharge from the Rayleigh East WwTW which will require further investigation but could be exacerbated by unphased growth.

In terms of water quality, the three WwTWs serving Rochford District - Rochford, Rayleigh East and Rayleigh West - discharge to tributaries of the Rivers Roach and Crouch which are Shellfish Waters and flow into areas designated under national and international environmental legislation (SSSI, SPA and Ramsar designations) and the water quality of these watercourses is generally poor. Page 48 of the Scoping Study states that further development draining to these three WwTWs has the potential to exacerbate the problem. Again further investigation is required into this issue.

In not addressing the findings of this report we deem the Core Strategy to be unsound in that it is not effective. This is because we do not believe that the Policies set out in the Core Strategy have clearly identified the infrastructure implications of the strategy and the delivery mechanisms and timescales for implementation have not been addressed. There is also an element of inflexibility in failing to recognise the findings of this report and the potential impact on growth delivery.

In order to make the Core Strategy sound, it must incorporate the findings of the Water Cycle Study Scoping Report and recognise the potential constraints to development delivery.

Referring to the report in Policy H2 would be an option. At this stage in the process we would consider it sufficient to include a statement about the intention to phase development in line with the findings of the Scoping Report and subsequent Outline and Detailed Stage Water Cycle Studies. The Site Allocations DPD would require more detailed information to inform the phasing so as to avoid bringing forward sites prematurely.

Please note that should the Inspector deem it necessary for us to attend the Examination in Public, we would be happy to do so but our preferred method at this time would be written representations.

Summary: The background evidence includes the Essex Thames Gateway Water Cycle Study Scoping Report carried out by Scott Wilson and completed in March 2009 however the findings of this report have failed to be captured in the policies of the Core Strategy (with the exception of the water efficiency requirements related to the Code for Sustainable Homes in Policy ENV9).

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Core Strategy Submission Document

16848 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

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Please note that should the Inspector deem it necessary for us to attend the Examination in Public, we would be happy to do so but our preferred method at this time would be written representations.

Change to Plan In order to make the Core Strategy sound, it must incorporate the findings of the Water Cycle Study Scoping Report and recognise the potential constraints to development delivery.

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Appear at exam? No

Soundness Tests ii

Core Strategy Submission Document

O - 16861 - 14271 - Policy H2 - Extensions to residential envelopes and phasing - i

16861 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Wendy Hook [14271]

61 Park Gardens
Hawkwell
Hockley
Essex
SS5 4HF

Agent: N/A

Full Text:

I am writing to object to Rochford's Core Strategy for 175 houses in Hawkwell which I believe is Unsound. The proposal in the Rochford core strategy for this many houses in the Ward of Hawkwell West is unsound because the vital requirements of the Governments planning policy are not met in terms of sustainability, and therefore the Hawkwell West (South Hawkwell) should be removed by the inspector and the allocation moved to a sustainable location.

In summary I object to his application for the following reasons.

1. Increased congestion on roads. The B1013 and surrounding feeder roads are already nearing their safe maximum capacity.
2. In ability to improve highways. The current road ways cannot accommodate the increased traffic without significant widening and improvements.
3. Distance from shops. There are no shops located within walking distance of this development.
4. Limited public transport. The current bus service is poor and Arriva have no plans to improve it.
5. Distance from railway station. Distance to the railway station and the lack of public transport will only encourage the use of private cars.
6. Semi-rural location unsuitable for large scale development. Any large scale development would mean a continuous coalescence of development between Hockley and Ashingdon via Hawkwell with the subsequent loss of community identity.
7. Loss of green belt. It is the council's duty to protect Green Belt from development at all cost. Brown field sites should always be preferable.
8. Loss of wild life. Wildlife diversity in the area will be reduced and the loss of habitat will almost certainly see the extermination of Muntjac deer in the area.
9. Loss of character. Rochford District Council has a duty to promote healthy communities and maintain the character of the area.
10. No social economic or environmental benefits.

Summary:

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Core Strategy Submission Document

O - 16861 - 14271 - Policy H2 - Extensions to residential envelopes and phasing - i

16861 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

the area.

10. No social economic or environmental benefits.

Change to Plan Hawkwell West (South Hawkwell) should be removed by the inspector and the allocation moved to a sustainable location

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16862 - 14272 - Policy H2 - Extensions to residential envelopes and phasing - i

16862 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr G Hook [14272]

61 Park Gardens

□

Hawkwell

Hockley

Essex

SS5 4HF

Agent: N/A

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Core Strategy Submission Document

O - 16862 - 14272 - Policy H2 - Extensions to residential envelopes and phasing - i

16862 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

9. Loss of character. Rochford District Council has a duty to promote healthy communities and maintain the character of the area.

10. No social economic or environmental benefits.

Change to Plan Hawkwell West (South Hawkwell) should be removed by the inspector and the allocation moved to a sustainable location.

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16863 - 8196 - Policy H2 - Extensions to residential envelopes and phasing - i

16863 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mrs J Robertson [8196]

166 Rawreth Lane
Rayleigh
Essex
SS6 9RN
01268 784586

Agent: N/A

Full Text:

I strongly object to yet more housing.

Rawreth Lane on overload now what with Asda, and Asda deliveries, and cut through the lane is at standstill a great deal of the time.

Noise level very high, pollution, dirt, rubbish you name it.

(Will we be eligible for triple glazing if yet more housing).

Where are the parks, green spaces, play areas, facilities for teenagers?

Public transport not providing very good service either.

Rayleigh station can't cope now.

Infrastructure already on overload.

I forgot to mention Macro.

We are surely on overlaod in Rawreth Lane.

Quality of life gone right down.

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Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16865 - 8318 - Policy H2 - Extensions to residential envelopes and phasing - i, ii

16865 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mrs E Byford [8318]

C/o Agent Stutt & Parker
Coval Hall
Chelmsford
Essex

CM1 2QF

Agent: Strutt & Parker (Mr Trevor Dodkins) [8117]

Strutt & Parker
Coval Hall
Rainsford Road
Chelmsford
Essex

CM1 2QF

01245254603

Full Text: Please see attached statement.

Council ref AE25

Summary: Please see attached statement.

Council ref AE25

Change to Plan Please see attached statement.

Council ref AE25

Appear at exam? Yes

Soundness Tests i, ii

Core Strategy Submission Document

O - 16870 - 14274 - Policy H2 - Extensions to residential envelopes and phasing - i, ii

16870 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Knight Developments [14274]

Knight Developments
C/o agent

Mr T Dodkins
Strutt & Parker
Coval Hall
Rainsford Road
Chelmsford
Essex

Agent: Strutt & Parker (Mr Trevor Dodkins) [8117]

Strutt & Parker
Coval Hall
Rainsford Road
Chelmsford
Essex

CM1 2QF

01245254603

Full Text: See accompanying Strutt & Parker Planning Document and Cannon Consulting Initial Highways Access and Accessibility Statement.

(Council ref AE27 and AE27a)

The Submission document fails the test of soundness for policy H2 in terms of not being justified. The removal of housing numbers from Rayleigh and in particular from south west Rayleigh is not founded on a robust and credible evidence base and it is not the most appropriate strategy when considered against reasonable alternatives of allocating sufficient housing in a tier 1 category town which meets the Council's sustainability criteria. Furthermore Policy H2 of the Submission DPD is not considered to be sufficiently flexible to deal with any changes to the RSS by being reliant on less sites and again fails the test on flexibility grounds.

The change required to the DPD to make Policy H2 sound is for the inclusion of the site to the south west of Rayleigh for at least 100 houses in the plan period.

Representation submitted in relation to proposed allocation of housing to the south west of Rayleigh and attendance required at examination to support the allocation of this site which is not in the submission document (see other responses to core strategy).

Summary: See accompanying Strutt & Parker Planning Document and Cannon Consulting Initial Highways Access and Accessibility Statement.

(Council ref AE27 and AE27a)

The Submission document fails the test of soundness for policy H2 in terms of not being justified. The removal of housing numbers from Rayleigh and in particular from south west Rayleigh is not founded on a robust and credible evidence base and it is not the most appropriate strategy when considered against reasonable alternatives of allocating sufficient housing in a tier 1 category town which meets the Council's sustainability criteria. Furthermore Policy H2 of the Submission DPD is not considered to be sufficiently flexible to deal with any changes to the RSS by being reliant on less sites and again fails the test on flexibility grounds.

Change to Plan

The change required to the DPD to make Policy H2 sound is for the inclusion of the site to the south west of Rayleigh for at least 100 houses in the plan period.

Appear at exam? Yes **Soundness Tests** i, ii

Core Strategy Submission Document

O - 16872 - 14178 - Policy H2 - Extensions to residential envelopes and phasing - i

16872 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr Donald Abbey [14178]

ivy cottage
church road
rawreth
SS11 8SG

Agent: N/A

Full Text: Dear sirs

re Policy H2
Proposal for 550 houses on "land north of London Road

This proposal is UNSOUND. The farmland must be saved because :-

- a) It is a buffer against the unrestricted growth of Rayleigh. This is good farmland which safeguards the countryside from encroachment. Once development is allowed anywhere on it there is no natural stopping point before the A1245.
- b) Brown field sites have been put forward by Rawreth Parish Council which can be used and would enhance the centre of the village without damaging the community identity. The Core Strategy proposals would fragment the village over a large area and more than DOUBLE the population. It would not protect the character of Rawreth.
- c) Building on the land north of London Road would put UNSUSTAINABLE pressure on local roads and amenities, which are already at overcapacity at times.
- d) A large housing estate built on that site would greatly increase the risk of local flooding. Heavy rainfall currently filters down the hill through the ground before seeping into Rawreth Brook, which, further along its course enters a flood plain. "Run-off" from a lot of houses would certainly add to the already established problem that the brook is prone to flooding. This is UNSUSTAINABLE for Rawreth residents and could be considered a breach of human rights.

I therefore object to the Core Strategy Proposals for the above reasons.

Summary: Proposal for 550 houses on "land north of London Road

This proposal is UNSOUND. The farmland must be saved because :-

- a) It is a buffer against the unrestricted growth of Rayleigh. This is good farmland which safeguards the countryside from encroachment. Once development is allowed anywhere on it there is no natural stopping point before the A1245.
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- c) Building on the land north of London Road would put UNSUSTAINABLE pressure on local roads and amenities, which are already at overcapacity at times.
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I therefore object to the Core Strategy Proposals for the above reasons.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

S - 16874 - 8329 - Policy H2 - Extensions to residential envelopes and phasing - None

16874 Support

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Swan Hill Homes Limited [8329]

Swan Hill Homes Limited
C/O Agent
Mr P Kneen
Charles Planning

Agent: Charles Planning Associates Ltd (Mr P Kneen) [5040]

Charles Planning Associates Ltd
1644-1645 Parkway
Solent Business Park
Whiteley
Fareham
Hampshire
PO15 7AH
01489 580853

Full Text:

1.0 Instruction and Introduction

1.1 Charles Planning Associates Limited (Chartered Town Planners) is Instructed by Swan Hill Homes Limited (Swan Hill) to prepare and submit representations on their behalf in respect of the Rochford District Local Development Framework: Core Strategy Submission (September 2009) Development Plan Document.

1.2 The comments refer to the relevant sections and policy designations in the Submission document, as appropriate.

1.3 The comments set out in this submission are intended to assist the District Council in taking forward its Local Development Framework. It is our intention to continue to be involved in the LDF preparation process and we look forward to the opportunity to comment further at the Examination to the Core Strategy.

1.4 If you have any queries regarding the content of this submission then please do not hesitate to contact:

Peter Kneen BSc (Hons) MSc MRTPI
Planner

2.0 Housing:
Policy H1 - The Efficient Use of Land for Housing

2.1 Swan Hill recognises the importance of seeking to concentrate new developments mainly in the existing urban areas, on previously developed land where possible, particularly in view of the Government seeking to ensure 60% of all such new developments are on previously development land (PDL).

2.2 However, given the character of the District, and the strategic housing requirement of the East of England Plan, Swan Hill supports the approach that the Council must also make provision for additional development on the edge of existing settlements on greenfield sites, particularly in the most sustainable locations. As such, Swan Hill supports that where feasible, the redevelopment of existing employment sites for residential/employment purposes can make a contribution towards the strategic housing requirement, provided that sufficient additional employment land is brought forward to ensure the stability of employment levels in the District, and to ensure employment growth meets the East of England Plan requirements.

2.3 Swan Hill considers that Policy H1 should include consideration that new extensions to existing settlements have regard to their potential impact on the wider characteristics and openness objectives of the Green Belt.

Policy H2 - Extensions to Residential Envelopes and Phasing

2.4 Swan Hill generally supports the approach taken by the Council in this policy. As set out above, Swan Hill consider the Council's acknowledgment that housing requirements should be met through the allocation of land on the edge of the existing settlements is the most suitable way forward to meeting the Council's strategic housing requirement and complies with the advice in PPS3.

2.5 The need for suitable greenfield urban extensions represents the best way forward for the Council to meet its strategic housing requirement, as set out in the East of England Plan. Swan Hill supports the recognition that the potential supply of alternative previously developed sites is limited, without detrimentally affecting the character of the District, and therefore the best way forward is the use of sustainable greenfield urban extensions to the existing settlements of the District.

2.6 However, Swan Hill consider that a fundamental consideration that the District Council should consider relates to the potential impact of the urban extensions on the Green Belt policy has been somewhat overlooked. The wider sustainability credentials of the settlements of the District should only be one of many key considerations for determining the level of expansion. In view of the proximity of Southend-on-Sea to all the main settlements of the District, and the influence this has on the likely location many people would travel for employment and leisure, sustainability of many of the settlements is not a key overarching factor, and greater weight should be placed on the potential impact on the openness of the Green Belt, as this cannot be remedied if development occurs in the wrong location.

2.7 As such, Swan Hill considers that determining the location of growth for the main settlements should be to identify

Core Strategy Submission Document

S - 16874 - 8329 - Policy H2 - Extensions to residential envelopes and phasing - None

16874 Support

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

those locations where the impact on the wider setting of the Green Belt can be minimised. Further justification for those general locations chosen should be identified in Policy H2. In this regard, Swan Hill has serious concerns regarding the removal of Land South West of Great Wakering as a viable option for the growth of the settlement. The development of this area of Great Wakering, in addition to the potential redevelopment of the Star Lane Industrial Estate could provide a more comprehensive development, whilst ensuring that the wider openness of the Green Belt is maintained. Land South West of Great Wakering is significantly better placed to limit the impact on the wider Green Belt than Land West of Great Wakering, and could contribute to the provision of an important amenity and wildlife site for the local community.

2.8 In addition, Swan Hill consider that the Council now has no reserve provision in the event that any of the existing employment sites set out in Policy H1 fail to come forward for development within the envisaged timescale. Further, Land West of Great Wakering has not been identified in the SHLAA as a deliverable site to help meet the strategic housing requirement, contrary to the requirement set out in PPS3.

2.9 As such, Swan Hill would support the provision of suitable sites which could be safeguarded for future development in the likelihood of a shortfall in supply.

Policy H3 - Extensions to Residential Envelopes Post 2021

2.10 As set out above, Swan Hill supports the overall approach the Council has taken towards the provision of sustainable urban extensions as a suitable means of meeting their strategic housing requirement. However, as set out for Policy H2 above, Swan Hill has serious concerns regarding the removal of several proposed sites set out in the October 2008 Preferred Options Core Strategy, without any guarantee of the ability to deliver those sites set out in Policy H1.

2.11 As also considered above, the inclusion of West of Great Wakering for 250 dwellings should not be included ahead of South West of Great Wakering, in view of the fact that the site is not identified in the SHLAA as available, suitable and achievable as required by PPS3, and thus is not supported by a robust and creditable evidence base for its inclusion as a strategic site for development.

2.12 Whilst Swan Hill acknowledge that alterations to Policy H1 has resulted in the removal of some locations for growth in Policy H3 (as set out in the Sustainability Appraisal), Swan Hill does not consider that the most appropriate locations have been chosen.

2.13 In addition to the matters raised above, the use of West of Great Wakering would also result in the loss of valuable agricultural land, which clearly in a Green Belt location, should be less suitable for development than other sites, such as South West of Great Wakering, which would have limited impact on the wider Green Belt policy, and not result in the loss of valuable agricultural land.

2.14 Finally, in respect of Policies H1, H2 and H3, all of the above comments are based on our interpretation of the Submission Version Core Strategy when compared to the October 2008 Version of the Core Strategy. Without the ability to undertake a detailed assessment of the Council's SHLAA, it is not possible to clarify the proposed Core Strategy position regarding the proposed direction of growth proposed for the settlements in the District. As such, Swan Hill reserves the right to make additional representations regarding the proposed Policies H1, H2 and H3 following the publication of the SHLAA in due course.

Policy H4 - Affordable Housing

2.15 In general terms, Swan Hill supports the approach taken by the Council towards the provision of affordable housing for new residential developments. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H5 - Dwelling Types

2.16 Swan Hill supports the policy provision of H5, and considers that the approach taken by the Council for this policy represents a suitably flexible alternative to stipulating percentages of dwelling mix, sought by some local authorities. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H6 - Lifetime Homes

2.17 In regard to this policy, Swan Hill objects to the Council's policy where all new dwellings should be provided to the Lifetime Homes Standard. Whilst it is acknowledged that the UK has an aging population, Swan Hill considers that seeking to provide Lifetime Homes on all sites is considered to be overly onerous for proposed developers, particularly when considering the requirement for all car parking spaces to be suitable for disabled users, which could result in more schemes becoming unviable. Therefore, the provision of a percentage of Lifetime Homes should be considered through negotiations with the Council at the planning application stage, and should be determined on a case-by-case basis.

3.0 Character of Place: Policy CP1 - Design

Core Strategy Submission Document

S - 16874 - 8329 - Policy H2 - Extensions to residential envelopes and phasing - None

16874 Support

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

3.1 The Town and Country Planning (General Development Procedure) Order 1995 (As Amended) makes the submission of a Design and Access Statement for most types of planning applications a Statutory requirement, and as such, the provision of a Design Brief represents a pre-requisite of all major planning applications.

3.2 Policy CP1 seeks to ensure the provision of good, high quality developments that reflect local characteristics and distinctiveness, this ideology is supported by Swan Hill.

4.0 The Green Belt:
Policy GB1 - Green Belt Protection

4.1 Following the amendments to the wording of the Policy since the October 2008 Preferred Options Core Strategy, Swan Hill is now generally supportive of Policy GB1 and its supporting text. However, as expressed above, it is important that where alterations to the Green Belt boundary occur as a result of the extension of the settlements to meet the strategic housing requirement, both the minimal amount of land is taken and where that land is taken for development, it represents the best available land which has a minimal impact of the wider openness characteristic of the Green Belt.

5.0 Environmental Issues:
Policy ENV3 - Flood Risk

5.1 Swan Hill generally supports the approach set out in Policy ENV3 regarding ensuring development accords with the sequential test of PPS25. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV4 - Sustainable Drainage Systems (SUDS)

5.2 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV4. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV8 - On-site Renewable and Low Carbon Energy Generation

5.3 Whilst Swan Hill recognises the importance of reducing carbon emissions, particularly in new housing developments, and the role this can play in reducing the nations overall Greenhouse emissions. As such Swan Hill is generally supportive of Policy ENV8. It is noted that Policy ENG1 of the East of England Plan sets out a threshold of developments comprising 10 or more dwellings. Swan Hill consider it important for the District Council to justify the reduction in the threshold level.

5.4 Further, no assessment of Policy ENV8 has been set out in the Sustainability Appraisal which justifies the change in threshold from that of Policy ENG1 of the RSS.

Policy ENV9 - Code for Sustainable Homes

5.5 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV9. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

6.0 Community Infrastructure, Leisure and Tourism:
Policy CLT1 - Planning Obligations and Standard Charges

6.1 Swan Hill generally supports the overall approach the Council has taken in Policy CLT1. It is considered Policy CLT1 sets out a degree of flexibility to ensure that all sites are considered on a site-by-site basis, assessing the individual merits of each planning application, in order to ensure the levels of contributions applicable meet the five tests of Circular 05/05. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policies CLT5 - Open Space;
CLT7 - Play Space;
CLT8 - Youth Facilities; and,
CLT10 - Playing Pitches

6.2 Swan Hill supports the need for new residential developments to incorporate a degree of new publicly accessible open space, children's play space, youth facilities and playing pitches, and as such, generally supports the policy approaches taken by the Council.

6.3 However, it is important that whilst the Council may seek to undertake an assessment of providing standard charges for new development, which, as set out in Policy CLT1, this should be based on thorough public consultation and consideration and sound justification. Swan Hill consider that within the provision of a standard charge, it is important that such provision allows for a degree of flexibility to ensure that each site is assessed individually and on its own merits. This is particularly important for those sites close to existing open spaces and facilities. As such, the levels of

Core Strategy Submission Document

S - 16874 - 8329 - Policy H2 - Extensions to residential envelopes and phasing - None

16874 Support

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

open space and recreation facilities required in the 'standard charge' should be based on an up-to-date PPG17 Open Space assessment, which should be used to form a key consideration in the levels of provision likely to be required in the standard charge system proposed.

7.0 Transport: Policy T1 - Highways

7.1 Swan Hill supports the overall objectives set out in Policy T1 requiring developments to be located and designed to reduce the reliance on the private car and to meet the infrastructure needs generated by development or seek to help achieve these needs is acceptable in principle.

7.2 Swan Hill recognises the importance of providing sufficient infrastructure provision to meet the requirements of development, and that where developments have insufficient consideration of impact on existing infrastructure, they should be considered unacceptable and contrary to National policy guidance. However, Swan Hill considers it important to emphasise that the developer's role should not be seen as a means to meet existing shortfalls in provision.

Policy T3 - Public Transport

7.3 Swan Hill is generally supportive of the policy approach set out in T3, however, as set out in paragraph 7.2 above, it is important that the District Council do not consider that it is the developer's responsibility to resolve existing shortfalls in provision of public transport, and any contribution towards additional public transportation provision should only be to mitigate against the additional level of demand likely from the development proposed.

Policy T5 - Cycling and Walking

7.4 Swan Hill supports the general approach to this policy, as Swan Hill recognises the importance of promoting the use of alternatives to the private car. The policy provision acknowledges the need to ensure relevant contributions in the event of additional travel demands generated by individual developments, whilst also setting out additional aspirations for the cycle network in the District.

7.5 As such, Swan Hill considers this policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy T8 - Parking Standards

7.6 The Council has recently (January 2007) adopted SPD on the requirements for parking standards, and as such, Swan Hill generally supports the policy approach chosen by the Council. As set out in the SPD, whilst Swan Hill generally supports the approach taken by the District Council towards setting residential parking standards, in that the Council has recognised that in the suburban areas, even with some access to public transport, the majority of residents will rely on the use of private cars. However, Swan Hill has concerns over the failure of the District Council to comply with the provisions of PPG13: Transport (2001) which sets out that Local Planning Authorities should not set minimum standards for car parking. Whilst it is acknowledged that PPS3 sets out provision for the consideration of local circumstances, it is considered that the Council has not justified this deviation from PPG13's maximum standard.

7.7 Whilst it is acknowledged that such justification may become apparent through the work currently being undertaken by Essex County Council, until such time, the District Council should only seek to apply the maximum standards indicated in PPG13. However, Swan Hill recommends that the District Council make provisions in the wording of the Policy to allow for changes in the event that future policy on car parking standards need to reflect the County standard, following the completion of the County Council review.

8.0 Economic Development: Policies ED3 - Existing Employment Land ED4 - Future Employment Allocations

8.1 In respect of Policies ED3 and ED4, Swan Hill notes that they have changed considerably since the October 2008 Preferred Options document, in that they are site specific regarding the location of the proposed redevelopment of existing employment sites. These four sites are also identified in Policy H1 - Efficient Use of Land, and in general, Swan Hill supports the approach to the redevelopment of these sites (where feasible) based on the assessments of the sites set out in this version of the Core Strategy.

8.2 However, Swan Hill has concerns that these policies might not be considered suitably sound given that insufficient opportunity has been allocated for consultation on their redevelopment. Without the SHLAA being publically available prior to the consultation on this Core Strategy, an insufficient evidence base has been provided to corroborate that these sites are neither suitable or deliverable to meet the test of soundness requirements.

Summary:

Policy H2 - Extensions to Residential Envelopes and Phasing

2.4 Swan Hill generally supports the approach taken by the Council in this policy. As set out above, Swan Hill consider the Council's acknowledgment that housing requirements should be met through the allocation of land on the edge of the

Core Strategy Submission Document

S - 16874 - 8329 - Policy H2 - Extensions to residential envelopes and phasing - None

16874 Support

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

existing settlements is the most suitable way forward to meeting the Council's strategic housing requirement and complies with the advice in PPS3.

2.5 The need for suitable greenfield urban extensions represents the best way forward for the Council to meet its strategic housing requirement, as set out in the East of England Plan. Swan Hill supports the recognition that the potential supply of alternative previously developed sites is limited, without detrimentally affecting the character of the District, and therefore the best way forward is the use of sustainable greenfield urban extensions to the existing settlements of the District.

2.6 However, Swan Hill consider that a fundamental consideration that the District Council should consider relates to the potential impact of the urban extensions on the Green Belt policy has been somewhat overlooked. The wider sustainability credentials of the settlements of the District should only be one of many key considerations for determining the level of expansion. In view of the proximity of Southend-on-Sea to all the main settlements of the District, and the influence this has on the likely location many people would travel for employment and leisure, sustainability of many of the settlements is not a key overarching factor, and greater weight should be placed on the potential impact on the openness of the Green Belt, as this cannot be remedied if development occurs in the wrong location.

2.7 As such, Swan Hill considers that determining the location of growth for the main settlements should be to identify those locations where the impact on the wider setting of the Green Belt can be minimised. Further justification for those general locations chosen should be identified in Policy H2. In this regard, Swan Hill has serious concerns regarding the removal of Land South West of Great Wakering as a viable option for the growth of the settlement. The development of this area of Great Wakering, in addition to the potential redevelopment of the Star Lane Industrial Estate could provide a more comprehensive development, whilst ensuring that the wider openness of the Green Belt is maintained. Land South West of Great Wakering is significantly better placed to limit the impact on the wider Green Belt than Land West of Great Wakering, and could contribute to the provision of an important amenity and wildlife site for the local community.

2.8 In addition, Swan Hill consider that the Council now has no reserve provision in the event that any of the existing employment sites set out in Policy H1 fail to come forward for development within the envisaged timescale. Further, Land West of Great Wakering has not been identified in the SHLAA as a deliverable site to help meet the strategic housing requirement, contrary to the requirement set out in PPS3.

2.9 As such, Swan Hill would support the provision of suitable sites which could be safeguarded for future development in the likelihood of a shortfall in supply.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16896 - 14275 - Policy H2 - Extensions to residential envelopes and phasing - None

16896 Support

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Southern and Regional Developments Ltd [14275]	Agent: Strutt & Parker (Mr Trevor Dodkins) [8117]
Southern and Regional Developments Ltd Unknown - represented by	Strutt & Parker Coval Hall Rainsford Road Chelmsford Essex
Mr T Dodkins Strutt and Parker Coval Hall Rainsford Road Chelmsford CM1 2QF	CM1 2QF 01245254603

Full Text: We support Policy H2 as sound, with reservations on the phasing of development. The site at south west Hullbridge can deliver housing prior to 2015. The housing distribution in Policy H2 should therefore be amended to include an early release of the land prior to 2015 and 2021 in line with our response that Policy H3 is unsound.

See accompanying Strutt and Parker Document, Cannon Consulting Transport Assessment and Flood Risk, Drainage and Service Report. Council ref AE29, AE29a and AE29b.

We support Policy H2 as sound, with reservations on the phasing of development. The site at south west Hullbridge can deliver housing prior to 2015. The housing distribution in policy H2 should therefore be amended to include an early release of the land prior to 2015 and 2021 in line with our response that policy H3 is unsound.

Representation submitted in relation to proposed allocation of housing to the south west of Hullbridge. Attendance required at examination to support this allocation.

Summary: We support Policy H2 as sound, with reservations on the phasing of development. The site at south west Hullbridge can deliver housing prior to 2015. The housing distribution in Policy H2 should therefore be amended to include an early release of the land prior to 2015 and 2021 in line with our response that Policy H3 is unsound.

See accompanying Strutt and Parker Document, Cannon Consulting Transport Assessment and Flood Risk, Drainage and Service Report. Council ref AE29, AE29a and AE29b.

Change to Plan N/A

Appear at exam? Yes **Soundness Tests** N/A

Core Strategy Submission Document

O - 16910 - 14278 - Policy H2 - Extensions to residential envelopes and phasing - i, ii, iii

16910 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: L J Construction (Mr L Jose) [14278]

L J Construction
Unknown, represented by agent -

Mr M Carpenter
Director
Planware Ltd
The Granary
37 Walnut Tree Lane
Sudbury
Suffolk
CO10 1BD

Agent: Planware Ltd (Mr M Carpenter) [14280]

Planware Ltd
The Granary
37 Walnut Tree Lane
Sudbury
Suffolk

CO10 1BD

01787465800

Full Text:

Policy H2 of the Core Strategy is not "sound". Policy H2 pre-allocates residential development "North" of London Road, Rayleigh.

My clients accepted that residential development is to take place in the Green Belt, and that this should be to the West of Rayleigh, but there is no justification why the area to the north of London Road has been selected, as opposed to any other area to the West of the town. This lack of justification pre-judges the forthcoming "call for sites" DPD to be produced by the council and is unsound.

Allocation of the area North of the London Road fails to take account of a number of the criteria of para 4.19 of the Core Strategy document, and would, amongst others; availability of existing infrastructure and the requirement to provide additional infrastructure; Potential to reduce car trips and dependency; Impact on the existing highway network; and encourages the coalescence of Rayleigh and Rawreth. This further emphasises that the strategic decision has not been properly made.

Para 4.5 of the PPS confirms that core strategies should make clear spatial choices about where development should go in broad terms. It does not say that sites should be allocated, which in effect is what policy H2 does.

The policy also refers to appendix H1 which sets out details of local infrastructure. Again this fails to comply with PPS12. Para 4.9 of the PPS requires infrastructure needs and costs to be identified. This has not been completed or published. There is no evidence to support the infrastructure requirements, or who will provide it, or when.

The document therefore fails to comply with PPS12 and is not sound. The reference to north of London Road Rayleigh should be replaced by a general strategic requirement of West of Rayleigh and the technical analysis should be fully considered in the DPD "Site allocations" document.

The site allocation should be general at this stage in order to allow proper consultation of the alternatives. This has not previously been consulted on in the previous options documents.

There are alternative sites to the west of Rayleigh town centre that do not require such a substantial investment to the highway network, that are closer to major transport junctions and interchanges than sites north of the London Road. These considerations do not appear to have been fully taken into account in making the strategic assessment and allocation of sites to the north. Other sites have better highway links and are thus more sustainable, but no assessment has been considered in public. The site allocation in this document flies in the face of national guidance in PPG13. The authority appear to have selected their preferred option from the previous consultation document, but gone one stage further in this publication, refining the defined area further without proper consultation. No Credible alternative sites to the West of the town centre appear to have been considered.

The site allocation should be general at this stage in order to allow proper consultation of the alternatives. This has not previously been consulted on in the previous options documents.

Proposed Change

We request that the policy be changed from "North of London Road, Rayleigh" to refer to "West of Rayleigh", pending further consideration of alternative sites.

We reserve the right to expand on these grounds in more detailed evidence to follow should the Inspector request.

Site location plan received, see Council ref AE30

Summary:

Policy H2 of the Core Strategy is not "sound". Policy H2 pre-allocates residential development "North" of London Road, Rayleigh.

My clients accepted that residential development is to take place in the Green Belt, and that this should be to the West of Rayleigh, but there is no justification why the area to the north of London Road has been selected, as opposed to any other area to the West of the town. This lack of justification pre-judges the forthcoming "call for sites" DPD to be produced by the council and is unsound.

Allocation of the area North of the London Road fails to take account of a number of the criteria of para 4.19 of the Core Strategy document, and would, amongst others; availability of existing infrastructure and the requirement to provide

Core Strategy Submission Document

O - 16910 - 14278 - Policy H2 - Extensions to residential envelopes and phasing - i, ii, iii

16910 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

additional infrastructure; Potential to reduce car trips and dependency; Impact on the existing highway network; and encourages the coalescence of Rayleigh and Rawreth. This further emphasises that the strategic decision has not been properly made.

Para 4.5 of the PPS confirms that core strategies should make clear spatial choices about where development should go in broad terms. It does not say that sites should be allocated, which in effect is what policy H2 does.

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The site allocation should be general at this stage in order to allow proper consultation of the alternatives. This has not previously be consulted on in the previous options documents.

Site location plan received, see Council ref AE30

Change to Plan Proposed Change

We request that the policy be changed from "North of London Road, Rayleigh" to refer to "West of Rayleigh", pending further consideration of alternative sites.

We reserve the right to expand on these grounds in more detailed evidence to follow should the Inspector request.

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

16919 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Barratt Eastern Counties [10009]

Barratt Eastern Counties
Barratt House
7 Springfield Lyons Approach
Springfield
Chelmsford
Essex
CM2 5EY

01245 232200

Agent: Kember Loudon Williams Ltd (Mr Martin Hull) [8466]

Kember Loudon Williams Ltd
Ridgers Barn
Bunny Lane
Eridge
Tunbridge Wells

TN3 9HA
Engalnd
01892 750018

Full Text: Local Development Framework

Representations on the Core Strategy
Submission Document, November 2009
On behalf of Barratts Eastern Counties

Introduction

The requirements of Core Strategies are enshrined in the 2004 Planning and Compensation Act, the Town & Country Planning (Local Development) England (Regulations) 2004 and the 2008 policy guidance in PPS12. The requirements of Coe Strategies are clear. And they are legal requirements. The Core Strategy must comply with the Local Development Scheme, Statement of Community Involvement and the Regulations. The Core Strategy must be subject to a sustainability appraisal, have regard to national guidance, conform generally with the Regional Spatial Strategy and have regard to any Sustainable Community Strategy. A Core strategy must be sound - justified, effective and consistent with national policy. The following representations therefore focus on these legal requirements.

HOUSING

Paragraph 4.6 - Evidence Base

To meet the soundness test Submission Core Strategies (SCS) must be justified, that is to say it must be founded on robust and credible evidence base and comprise the most appropriate strategy when considered against reasonable alternatives. The housing strategy in as far as it identifies a need for Green belt sites is sound, however, there are other elements which are unsound.

Paragraph 4.6 notes that the Strategic Housing Land Availability Assessment (SHLAA) has examined the supply of housing. It is presumed that the Table at paragraph 4.6 is the outcome of this examination. Whilst the SHLAA has some legitimacy in that it identifies various sites that are apparently available, we are concerned that because the SHLAA was only published in November 2009 it post dates the SCS. This implies that the SCS is driving the SHLAA exercise rather than the other way round. Whilst this may have no real practical effect on the outcome of the SCS and the identified need for Green Belt sites, the Inspector will be mindful of the advice in paragraphs 33 and 54 of PPS3 that SCS draw on the evidence in SHLAA. It may be that the SCS should explain how the evidence base has been used to justify the strategy.

PPS12 explains at paragraph 4.37 that Core Strategies are based on thorough evidence. Since the SHLAA has only recently been published it is considered that the SCS is unsound as it is not justifiable. This, together with other comments on the SCS, indicates that the process should be delayed to ensure that a more robust document is placed in front of the EiP Inspector.

Table at Paragraph 4.6 - Evidence base

From our review of the available evidence it would appear that the housing land supply is insufficient and that Green Belt release are required. From the wider strategy being promoted we note that some of the sites that the District Council consider to be 'appropriate' are likely to relate to existing employment areas. As set out elsewhere in our representations, we maintain severe reservations that the redevelopment of existing employment sites for alternative uses and particularly the Eldon Way Industrial Estate is unsustainable. We will make reference to the effectiveness of this strategy in relation to sustainability, whether it is justified in the context of National Policy and the deliverability of such a strategy elsewhere.

In particular, paragraph 11.32 of the SCS refers to existing employment land and sites within the UCS. It does not refer the SHLAA and as such it appears that an evidence base to support the re-use of employment land for residential is not reported in the SCS.

Having reviewed the 2008 Annual Monitoring Report, as we did when commenting on the 2008 Preferred Options Core Strategy, we maintain severe doubts as to the appropriateness of some of the previously developed sites identified as potential housing sites and their expected housing yield. Whilst we cannot at this stage ascertain whether the SHLAA

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CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

sites referred to in this table correlate with the Annual Monitoring Report and indeed the 2007 Urban Capacity Study, it is our view that there will be some commonality and so the reliance on these sites is likely to be at odds with Government Policy. We shall elaborate on this objection in relation to the specific housing policy below.

We note that the last two rows in the Table at paragraph 4.6 set out figures with and without Green Belt releases. The text to this section of the Core Strategy should, for reasons of clarity, explain that Green belt review will be necessary in order to deliver the required housing.

Paragraph 4.9

The table on page 40, which sets out the settlement tiers, is supported. Rayleigh, Rochford/Ashingdon, Hockley/Hawkwell are clearly the largest settlements in the District and they benefit from good employment, housing, leisure, community and public transport provision. These settlements are the most sustainable ones with the greatest mix of uses. Consequently, it is sensible that the Core Strategy identifies these as top tier settlements and is able to target them with growth accordingly. This component of the strategy is justified by reference to sustainability data and is effective, since targeting development at these locations will ensure a more sustainable pattern of development.

Paragraph 4.14

We maintain that the strategy for redeveloping the Eldon Way Industrial Estate for housing and other alternative uses to employment is unsound. It is neither justified nor effective. The Industrial Land Availability Study 2006 sets out on page 7 strategic objectives. The 3rd objective seeks to Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive. Clearly the strategy as currently drafted envisages major changes to existing industrial estates, including alternative uses. This strategy is not consistent with other strategies and evidence based studies and so cannot be justified in the context of the tests set out in PPS12. It is also an ineffective strategy since the new employment locations that would free up the Eldon Way site for redevelopment relies on transport infrastructure that has no certainty of being delivered. Principally, the erosion of employment uses at Eldon Way could make the settlement of Hockley/Hawkwell less sustainable and thus conflict with the tiered approach on page 40, paragraph 4.9.

Policy H1

Prioritising the use of previously developed land ("pdl") is supported in principle. It is a justified strategy in the context of PPS3 and effective as sequential choices can be made by implementing the policy. However, the District Council is also promoting a strategy which seeks the redevelopment of existing employment locations to alternative uses and by consequence is identifying green field sites for new employment development elsewhere (Policy ED4 refers). This 'land swapping' is not considered consistent with PPS3, nor is it considered to be justified or effective in delivering the desired strategy. This is particularly the case as most of the existing employment sites are occupied and therefore unavailable for redevelopment. In addition, the new Greenfield sites are in an arguably less sustainable locations away from the top tier settlements identified on page 40 of the Submission Core Strategy. Clearly this element of the strategy is inconsistent with the wider strategy.

The Industrial Land Availability Study 2006 is included as an evidence base by the District Council. It includes an introductory section, which explains that the authority wishes to make Rochford the place of choice for new business. It includes several strategic objectives on page 7 including "Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive." It reviews existing employment areas and identifies vacant land, including land available from allocations. It does not include any assessment of new sites or potential opportunities for new sites that might have been expected to feed into the Core Strategy. The strategy for identifying Green Belt site employment allocation does not appear to be based on any evidence in this document and in that context cannot be justified. The strategy being promoted potentially conflicts with Government policy in PPG13, PPG2 and emerging PPS4.

The Employment Land Study 2008 is a much later document. It has a key recommendation on page ii "we recommend that Rochford District Council adopts strong policies to protect existing employment land." Furthermore under recommendations for existing sites on page iii-iv of that document it states "In our view, Hockley Trading Centre is a strategically well placed employment location. However, we recognise the ambitions of the Hockley Town Centre masterplan and that within this the Council should consider it to be allocated for other uses. However, we recommend that this reallocation happen only if provision is made within the masterplan for office use within Hockley Town Centre as part of a mixed use scheme." The view of the writers of this document is clear - the Eldon Way Industrial estate (Hockley Trading Centre) is a good employment site and that it is for other reasons that alternative uses are being considered and only then if office development is supported. This supports our representations that new future uses at the Eldon Way site should be employment dominated and that alternative uses should relate to the objectives of the Town Centre which is to enhance the shopping and leisure facilities. Residential is not an appropriate alternative.

This document recommends the use of land to the west of Rayleigh for employment and envisages Green belt release. However, the SCS does not explain through the evidence base why existing employment sites should be 'deallocated' and Green belt land unnecessarily used.

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CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

In addition to these key issues we have some specific concerns. As a consequence we maintain an objection to the second paragraph of Policy H1. This policy states that the Council will seek the redevelopment of various industrial estates including Eldon Way. The Policy says that alternative uses will be sought (presumably alternative to the existing employment offer) and that new land will be allocated elsewhere. This policy statement, in relation to Eldon Way in particular, is unsound for a number of reasons:

The emerging Hockley Area Action Plan consulted upon in 2008 states that the Eldon Way Industrial Estate is strategically well placed. In a sense this statement underplays the true importance of this highly sustainable employment location and only major employment area in Hockley/Hawkwell. The employment area is adjacent to the railway station and located a short distance from the main bus routes that run along Spa Road. Some of the residential areas of the town are also within walking distance of this commercial area, thus providing a potential for sustainable travel by employees. The Eldon Way Industrial Estate is therefore right at the heart of the settlement of Hockley/Hawkwell and provides an opportunity to meet sustainable transport objectives by reducing the need to travel by car. Consequently, this employment area should be highlighted as a premier employment site in sustainability terms, both in the context of PPG13, PPG4 and PPS6. To encourage alternative uses as set out in Policy H1 implies the removal of the majority of employment based activity at Hockley/Hawkwell and this would be contrary to National policy, would not be the most appropriate strategy when considered against alternatives and is therefore unsound.

Whilst it is acknowledged that improvement to the Eldon Way Industrial Estate can and should take place, the extent to which the mix of employment uses should be altered in favour of alternative land uses requires careful consideration. It is our view that a mix of existing or indeed new employment land uses with some Town Centre type uses should dominate the Eldon Way site. A mix of employment types between offices, light industry and other high technology industries should be encouraged as this will provide many locational advantages to the firms that agglomerate together. The Council says that the existing uses on this site are harmful to amenity. However, the site has operated for many years without any significant issues and if renewal for B1 type uses are encouraged then the employment area can be maintained without harm to amenity. Renewal of the employment stock can help develop and improve trade, improve the sustainability of businesses as a whole and make for a more flexible labour market as skill levels are varied. A singularly different use altogether or a variety of uses which excludes employment could undermine the long term sustainability of the area and Town Centre. As such Policy H1 is not an effective strategy and should be amended to acknowledge the importance of Eldon Way and the need to renew the employment stock to ensure that the site maintains its important role as a employment site, albeit with some ancillary alternative use development where appropriate.

The 2008 Retail Study notes that Hockley Town Centre is not strong and there is trade leakage. Eldon Way Industrial Estate provides a customer base for existing town centre uses. Weekday spending within town centres is an important contributor to the viability of many retail and leisure businesses either through expenditure by employees during the lunchtime trade or expenditure by employers, on necessary goods and services. This relationship helps sustain the critical mass of a centre and provides a platform for new retail and leisure growth. It is important to have a balanced centre with a variety of uses. Policy H1, as currently drafted, implies the removal of employment related development and this is likely to harm the vitality and viability of Hockley Town Centre. The Council has presented no evidence to suggest that this is not the case. Importantly, the 2008 Retail Study explains that there is a need for additional retail and office space. In principle we would support additional office and other B1 type uses plus retail but employment uses should always dominate for the sustainability reasons given above. Retail and office development are likely to present a viable alternative to some of the more industrial type uses.

Consequently, we do not support the phrasing of the third paragraph of Policy H1 and maintain that the most appropriate strategy is to seek renewal of the employment stock with employment based uses and with some new retail development. Removal of employment land uses completely as currently implied-which was the approach adopted in the emerging Hockley Area Action Plan - is not a justifiable strategy.

One of the key tests of a Core Strategy is consistency between policies in the emerging Plan and this strikes at the heart of demonstrating an effective strategy. Policy H1 implies alternative uses to employment and the relocation of Eldon Way to a site identified under Policy ED4. However, Policy RTC6 sets out a suite of policy criteria for Hockley Town Centre which includes employment and commercial activities. In addition Policy ED3 seeks the protection of sustainable employment sites (Eldon Way) and notes that some reallocation of existing employment sites will include a proportion of employment. It notes that in the case of Eldon Way employment development will form a component. The policies appear at odds with one another. The third paragraph of Policy H1 should be deleted as the second paragraph is sufficient to set a strategic context for delivering new housing development. The employment policies and Hockley specific policies should be left to consider the type and quantum of land uses appropriate in the area. If the third paragraph of H1 is to be retained then it should tie in more with Policy RTC6 and in our view explain that employment uses should dominate any redevelopment proposals for the Eldon Way site and that retail and leisure uses should be a supporting proportion.

Implementation, Monitoring and Delivery - page 132 onwards

One of the key tests of soundness is that the Core Strategy should be effective - it should be able to deliver its strategy. The Implementation strategy set out at page 132 onwards of the Core Strategy does not explain how Policy H1, RTC6 and the strategy for redeveloping Eldon Way (Policy ED2 and ED3) will be delivered. The comment at Policy ED3 on

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page 161 identifies it as a potential risk and alludes to land assembly difficulties and the choices to be made by owner/occupiers. In order to deliver the strategy there should be a clear understanding as to whether the new land use values being promoted are sufficient to encourage relocation voluntarily. Secondly there is a need for more information to be gathered and presented to show that current occupiers and landowners are willing to relocate and the timescales likely for this. For example, do the building lease contracts enable early review or are there any break out clauses. There should be some commentary on whether the Council will engage in compulsory purchase orders to pursue their strategy should the 'encouragement' route fail. As currently drafted there is no clear path to deliver the strategy and the danger is that despite reallocation, the sites identified for redevelopment will not come forward in the plan period. In this regard, evidence to satisfy the test of soundness is not provided.

Policy H2 - General Locations

We support the strategy that new housing growth should be targeted at land South of Hawkwell. This area is suitably located to the urban area of Hockley/Hawkwell and to tie in with the settlement tiers on page 40 of the Submission Core Strategy the same terminology for settlement should be used. This ensures a consistency within the SCS. The choice of this location as a housing growth area is appropriate as it would not contribute to the coalescence of the urban area with Ashingdon (there is existing development between this identified housing area at Rectory Road and Ashingdon and moreover, Rectory Road can form a natural physical boundary for the new Green belt boundary. This area is also well located to the existing road network. Cherry Orchard Way has recently been improved and provides much better accessibility to the proposed housing growth area than any other location around Hockley/Hawkwell. The existing bus routes along Rectory Road also make this location sustainable and the additional housing proposed will help underpin the financial viability of bus routes in this area. Locally there are employment opportunities, including the small commercial estate off Main Road. The Eldon Way Industrial Estate adjacent to the Town Centre also provides the opportunity for employment locally. Extensive public open space, play pitches and built leisure facilities are located just to the north of this area and a community hall is located off Briar Close, nearby. The area to the south of Hockley/Hawkwell is close to local shops on the corner of Heycroft Road and Main Road and there are numerous footpath links between this area and the local community including links via Thorpe Road, Thorpe Close, Briar Close, Hawkwell Park and Park Gardens. The area therefore provides the opportunity to enhance existing links, including cycle links, and contribute towards community integration - more so than other sites on the south side of this settlement. The site is also in the control of one house builder and deliverable.

However, we find that the Policy is not fully consistent with national policy and furthermore needs to be reviewed in order to be justified and effective. We have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with this policy and feel that Green Belt review should be more explicit throughout the SCS. We note that it is only Policy H3 which indicates the need for Green Belt land review. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H2 and certainly Policy H3 and Policy GB1 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary.

Policy H2 - Phasing and Quantum

The 2008 Preferred Core Strategy document indicated that the area south of Hawkwell should deliver 330 dwellings over a phasing period to post 2021 (see Policy H2 and H3 of that document). The SCS reduces the quantum of housing in this area to 175 but expects delivery by 2015. At a broader level the Preferred Options Core Strategy of 2008, (Policy H2) required 1,450 dwellings to 2015 and a further 1,050 by 2021. In the SCS the figures are now 775 and 1,010 respectively.

Since the SHLAA post dates the publication of the SCS, we are uncertain as to the reason why such a significant reduction in quantum of housing and extensions to the residential envelope is considered necessary. Presumably it is the 'new' strategy to redevelop existing employment areas within the settlements that has led to this change. Our representations on this strategy and specifically the Eldon Way Industrial Estate are included elsewhere within our representations. Previously we have commented on the Table at paragraph 4.6 of the Submission Core Strategy and the lack of evidence to underpin that table. It seems odd that in the space of a year the expected requirement for Greenfield sites has effectively halved on the basis of a SHLAA exercise. The community is therefore not able to effectively

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comment on the housing land supply and at this stage the Submission Core Strategy is legally unsound.

That said, we are of the view that the quantum of housing envisaged south of Hockley/Hawkwell should be more than the 175 currently envisage. In coming to this view we have reviewed the Urban Capacity Study and the latest housing figures in the Annual Monitoring Report 2008. We conclude that the shortfall in housing land supply is such that 330 dwellings in this location is appropriate.

The recently published SHLAA is based upon the data obtained from the Urban Capacity Study 2007, a call for sites exercise and data from the Annual Monitoring Report 2008.

The 2007 Urban Capacity Study (UCS)

1. 2007 is widely recognised as being the peak level of house prices in the UK and it was acknowledged by Government and practitioners alike that 2007 house prices were at an unsustainable level. It is our view that utilising the 2007 UCS as an evidence base without reference to the market does not pick up the depressed demand that is likely to now exist. Recent corrections to the housing market now mean that housing land prices are at a much lower and arguably more affordable level than before. The implications are that some pdl may not be viable for housing development. Often brownfield sites have much higher development costs than Greenfield sites and so the yield from urban capacity will be much lower than anticipated in the 2007 study. One example is the employment allocation of the Adopted Local Plan located at 76-92 Main Road, Hawkwell. This site has been allocated for several years and has been available during the most recent rises in residential property prices during 2006-07. As a consequence the lack of progress on the site can only be described by its current occupancy and perhaps it comprises high value uses that do not encourage redevelopment. Despite this the site is identified as having high potential for alternative use and high potential demand. The SHLAA form notes that there is no information on legal constraints (e.g., tenancy agreements) As a consequence it is difficult to see how this could continue to be a potential site and as a consequence the allowance for green field releases should be increased.

2. There are considered to be other instances in the UCS and the recently published SHLAA where the assumptions and calculations would indicate that the 1301 urban capacity figure is over optimistic and the SHLAA assessment is limited. In the assessment of 'non-residential sites in appropriate locations' within the UCS assumptions are made as to the probability of sites coming forward for new housing. 68-72 West Street, Rochford is identified as a high probability site but we note that it has been subject to 7 refusals of planning permission/conservation consent. There is a significant gap between the urban capacity identified as being suitable by the Council and the capacity applied for by the owners. Given its alternate use value, it is debateable whether the two capacity figures can be reconciled. No 247 London Road is another example of a site allocated in the Local Plan but which hasn't come forward. This is now the subject of a proposal for a care home and if approved would further limit the scope for market/affordable housing capacity on the site. A striking example of how the urban capacity study has underestimated is also evidence by 2-4 Alderman's Hill, Hockley - described as a disused service station. There has been no residential development application on this site since 2004 and most recent applications have sought commercial use of the site. Rather than being evidence of housing land deliverability, this particular site evidences the need for commercial uses in the area. There are therefore deliverability doubts over these 'high probability' categories which amount to some 40 units.

3. In relation to the assessment in the UCS entitled 'intensification of existing residential uses' we note that the assessment is premised on an assessment of recent trends taking into account net completions between 2001-2006 and 2005-06. This is effectively an assessment of windfall trends and not an approach that PPS3 encourages. Importantly Table 3-12 in the urban capacity study seeks to project forward urban capacity from residential redevelopment - a period that benefited from high house prices and PPG3 guidance encouraging redevelopment. These two circumstances have markedly changed and so the assumptions and conclusions drawn would also have changed. Even taking into account the UCS discounting, the reliability of the 404 units from this source must be questioned and in our view the 1301 figure cannot be a sound basis for urban capacity and further Greenfield releases are necessary.

4. In the section of the UCS entitled 'subdivision of dwellings' and 'living above the shop' it is estimated that recent trends would result in 7 and 15 units. Our concerns with using trends as a basis for urban capacity are detailed above - PPS3 does not encourage this. Rather, local authorities are charged with surveying their areas, identifying which areas may yield urban capacity and how much and developing policies to achieve that. Government guidance does not encourage the estimation of windfalls in the way the UCS does.

5. Redevelopment of established employment land is a separate section within the UCS. At 1 above we identify the low probability of the Main Road residential allocation coming forward. This remaining section of the UCS considers 11 further employment sites which were first identified in the 2000 UCS. Three of these are considered to have a high probability of coming forward. We have looked at these three sites and can find no evidence that they are likely to come forward. In the 8 years between 2000 and 2008 the three identified high probability employment sites have not been developed and there is no reason to assume that the next 5-10 years will be any different. For example the Rawreth Industrial Estate is identified as being well used in the UCS and although it has some unneighbourly uses there is no indication that the site is available, suitable or deliverable for residential. Land between 39-69 Lower Lambricks, Rayleigh is identified as having a high probability of residential uses. Yet there is no

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evidence of any pre-application advice or planning applications for this area. Stambridge Mills, Mill Lane, Stambridge is a further example. This site is separated from the urban area, in a flood risk zone and protected in the 2006 Replacement Local Plan by Policy EB9 which promotes B1 uses. Against this background there is only two relevant planning applications affecting this area both date from the early 1990's and relate to a plant room and loading bay. There is no evidence that this is likely to come forward for residential purposes in the next 5-10 years.

6. In the UCS extant permissions are identified as 856 dwellings. It is important to note that this figure needs to be continually reassessed so that from the point of adoption of the Core Strategy a 5 and 10 year housing land supply is available. The SHLAA notes extant permissions for 2009-14 being 106. As noted below extant permissions do not necessarily translate into deliverable sites. There is therefore a contingency that needs to be built in. Further allocations on greenfield land need to be increased and as such the quantum of housing in the area south of Hockley/Hawkwell should be increased to 330 dwellings in order to begin to meet the shortfall identified.

The District Council's 5 year housing supply assessment

7. The District Council's Annual Monitoring Report ("AMR") 2008 purports to demonstrate a 5 year housing land supply. The preamble to Table 4.10 in the AMR 2008 explains that Rochford District Council ("RDC") has included units under construction, units with full permission, units with outline permission, units with a resolution to grant, units subject to preapplication discussion/Urban Capacity Assessment and land allocations in its trajectory. The reader is referred to Appendix B which breaks down the sites in more detail. The recently published SHLAA also includes a table showing a potential 1273 dwellings deliverable. However, it refers to "appropriate brownfield sites." Since these 'appropriate sites' are do not benefit from an application or a planning permission it is difficult to programme them into the housing delivery trajectory.

8. In the full planning permission category of the AMR 2008 where work has not yet started there can be no guarantee that all these sites will be delivered in the 5 years. This comment relates to the one above in relation to the recently published SHLAA. It is not uncommon for permissions to be obtained to provide a means for valuing a site where the owner has no immediate plans to sell the site or develop housing. Delivery may also be hampered by funding constraints, or site assembly problems (where sites are in an alternative use or relocation constraints). Appendix B of the AMR 2008 does not set out the intentions of the landowner or whether the sites are truly achievable in the 5 year period as per PPS3 requirements. The SHLAA purports to show developer intentions at Appendix C but the assessment by the local authority into the legitimacy of some of the claims is not presented. The evidence base is not as full as it should be to demonstrate the robustness of Table 4.6 of the SCS. It is also unclear the extent to which this table is based on either the UCS 2007, AMR 2008, SHLAA 2009 or a combination of all three. This should be set out clearly.

9. In addition, to the 'non delivery' of a proportion of new homes in the AMR 2008, there is concern at the timings of delivery in that data set, for example, 10 units in 2008-2009 relates to outline planning permissions and it is doubtful whether reserved matters can be turned round quick enough to begin delivering housing in this year period. There could well be examples in that set of data where the delivery of units in the first year of the 5 is unlikely, thus delivery is reduced for that period and pushed back and this process is then compounded throughout the data set up to and beyond year 5. Statistical evidence from the Department of Communities and Local Government ("CLG") reveals that building starts are 43% down on the quarter to March 2009 compared with March 2008. It is not clear whether the recently published SHLAA has taken this into account and unless it does the data in the Table at 4.6 of the SCS cannot be relied upon, particularly given the current recessionary circumstances. In relation to the Table at Paragraph 4.6 a refinement is therefore needed to take into account this effect on phasing.

10. This problem is compounded for other units relied upon where permission has been granted but no start on site has been made; this accounts for a considerable number of sites in 2009-10 period (100 dwellings) which is (year 2 of the 5 year period). A delay in these will require more Greenfield sites to be identified in order to meet the shortfall.

11. Finally we note that the East of England Plan expresses its land supply requirement as a minimum. This strategy is not reflected in the

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Submission version of the Core Strategy policy H2.

12. In summary since neither the UCS nor the Annual Monitoring Report form a SHLAA, reservations are maintained about the degree to which sufficient housing land has been identified.

Policy H3

In the Preferred Options Core Strategy 2008 more locations were identified for housing growth in the post 2021 phase. Whilst it is our view that land south of Hockley/Hawkwell should benefit from a greater number of dwellings than the 175 currently identified (330) in order to make the strategy effective. We are concerned at the significant change in strategy between the Preferred Option Core Strategy and the Submission version, which has significantly less housing growth on green field sites. This change in strategy is so significant that we would question whether it is appropriate in the context of soundness and the consultation processes that have taken place so far.

We also have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with other policies in the SCS and feel that Green Belt review should be more explicit throughout the SCS. As it currently stands there is a potential conflict with national policies and limited justification for the Green belt strategy. We note that in Policy H3, which indicates the need for Green Belt land review, the advice is limited and unclear. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H3 and Policy GB1/H2 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary. Not to do so is unsound for justification and effectiveness reasons.

Policy H4 - Affordable Housing

As currently drafted we feel that the policy is not concise enough and that the policy does not reflect current guidance. The phrase 'at least' would indicate that in most cases affordable housing above 35% will be sought. Our understanding is that the 35% figure is recommended in the SHMA and that to provide a policy framework which seeks to go beyond that figure would potentially be unworkable as many sites could not financially bare the burden of over a third of the net developable area not yielding a value. The policy should be redrafted so that "a target of 35% affordable housing shall be provided on all developments of 15 or more units..."

The last policy paragraph provides some scope to relax this policy, if there are clear site constraints that make on site provision impossible. The policy, though, is not particularly clear on what would constitute exceptional circumstances. For example, physical site constraints, which unusually raise development costs, would be one such reason and this should be specified. There may be other reasons including the nature of housing needs in the part of the District the site is located which justify affordable housing below the 35% target. Design reasons may also have a bearing on how provision is made and in what form, particularly if the site is in an historic area where design might override housing need argument. It is therefore recommended that the policy expand on the type of circumstances where affordable housing may be relaxed and the type of information that will be sought of applicant's who have a need to invoke this part of the policy.

Policy H5

In support of the policy, it is advantageous that no percentages requiring a specific mix are included. This flexibility will enable developers and the Council to respond directly to changing circumstances in the local housing market. In the past some authorities have set out a percentage for the type of housing they require only to find that after a few years of strict implementation there is an oversupply of property of that type and no flexibility in the policy to address the problem.

Policy ED2 - London Southend Airport

It is considered that to grow non aviation related employment at a location north of Southend Airport where sustainable access from the rest of Rochford District requires careful consideration. Most Airports are serviced by aviation related employment development and as such a location close to the airport is sensible and sustainable. However, for surface access reasons it would be inappropriate to encourage travel from Rochford's main settlements to what essentially

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would be a rural location for general employment uses. Whilst sustainable access would be improved by a railway station and better bus links, there is no evidence to suggest that a sustainable surface access strategy for non related employment development at the Airport can be achieved. Paragraph 11.22 explains the critical importance of a railway station to the delivery of the strategy yet the Transport Chapter and Implementation Chapter provide neither a policy nor an assessment of deliverability. It is also notable that the South Essex Rapid Transit Policy T4, as set out at paragraph 10.16, notes that Rochford is not proposed to be served but may be served in future phases. This uncertainty is no way to plan for a major employment land supply strategy in the District. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley/Hawkwell, Rochford and Rayleigh is unsound.

Policy ED3

We fully support the first sentence of the Policy and note the apparent contradiction with the statements in Policy H1 and elsewhere which seeks to develop on alternative uses at industrial estates such as Eldon Way.

This contradiction is evidence in the second paragraph of Policy ED3. In our representations on Policy H1 we have explained why it is not sound to diminish the employment stock at Eldon Way and the importance of maintaining a dominance of employment type uses at this estate. These arguments are not repeated here.

We note the sentiments of the third paragraph and in accordance with our representations elsewhere are of the view that this sentence should be revised to explain that Eldon Way will accommodate principally employment type uses. As noted elsewhere uses which are an alternative to employment would diminish this highly sustainable employment site and this is unsound when assessed against National Policy.

Policy ED4 - Future Employment Allocations

In part, the de-allocation strategy is not supported as it is considered unsound when set against sustainability criteria. In relation to the Eldon Way Industrial Estate it is considered critical to the ongoing sustainability of this settlement that employment uses are maintained at this location. It is close to the railway station, bus routes and local residential areas from which the opportunity exists for employees to walk or cycle to work. Its location adjacent to the Town Centre offers opportunity for some retail and leisure development to complement the centre and to maintain a supporting function. These sustainable benefits would not occur with the deallocation of Eldon Way or the significant erosion of its employment floorspace. Whilst redevelopment of the employment site to achieve new employment is supported, the dominant land use should continue to be employment use. As a consequence, the 18ha of land required for employment in this policy is considered to be excessive and the policy should be reviewed to explain that redevelopment of existing employment sites for primarily new employment development will be encouraged.

Policy T4

It is noted that the South Essex Rapid Transit policy, as elaborated upon at paragraph 10.16 notes that Rochford is not served but may be served in future phases. This uncertainty is contrary to the delivery principles of soundness and directly puts at issue the employment land supply strategy in the District which is founded on sustainable access to new sites. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley, Rochford and Rayleigh is unsound.

Appendix H1, CTL1 - Infrastructure

It is recognised that necessary infrastructure provision is an important part of creating a sustainable development and in that context appendix H1 is supported. The supporting text notes that the table at Appendix H1 is not exhaustive and in that context it is very important that the framework properly distinguishes between what should be provided as part of new development schemes and what shouldn't. It is therefore essential that the framework acknowledges the importance of Circular 05/05 and the tests which say that provision of infrastructure and/or contributions should be:

- * Relevant to planning
- * Necessary to make the proposed development acceptable in planning terms
- * Directly related to the proposed development
- * Fairly and reasonably related in scale and kind to the proposed development
- * Reasonable in all other respects

As is made clear (Paragraph B9 of Circular 5/05) contributions should not be used to make good existing deficiencies in infrastructure provision. Nor are they to be used to secure contributions to the achievement of wider planning objectives that are not necessary for consent to be granted. In that context the Core Strategy should set this out as its policy framework.

Policy GB1 - Green Belt

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The objectives of this policy are supported, although as noted in other representations the SCS is unsound as it does not meet the tests in relation to justification, compliance with national policy or effectiveness of strategy.

Policy GB1 mentions the objective to allocate the minimum amount of Green Belt land necessary. The policy should link to the requirements of PPG2 and RSS which are discussed in relation to the representations on Policy H2 and H3. The policy should set out a timeframe for the review and why Rochford requires a Green Belt review (what the exceptional circumstances are in this District that justify a review of local boundaries. The policy should be amended to set out a 2031 time frame and this may require the SCS to have an extended life span beyond 2021.

We would recommend the deletion of the word character since Green Belt designation is not related to landscape character as currently drafted. For clarity we would also recommend that the Policy or its supporting text explain that a Green Belt review will take place in support of an allocations document (paragraph 6.6) in order to identify an appropriate new boundary. This is particularly necessary given the commitment to a Green belt review in the adopted Local Development Scheme.

Policy CLT1 - Planning Obligations and Standard Charges

In view of the need to test fully the basis on which standard charges are based it is important that any document produced is in a development plan document that enables an examination in public. The policy should explain this in order that when the document is produced it accords with Policy and is based on sound evidence.

ENV9 - Code for Sustainable Homes

Object. The advice from the Department of Communities and Local Government is that the new requirement to have a rating against the Code does not make it mandatory to build a Code home or to have each new home assessed against the Code. It does however mean that all buyers of new homes be given clear information about the sustainability of the new home. A house builder can do this in one of two ways:

- they can choose to build a Code home, have that home assessed against the Code and provide the home buyer with a Code certificate stating the star rating the home has achieved
- or, they can choose to build to current building regulations standards, not to pay for an assessment and instead download a nil-rated certificate of non-assessment (also referred to as a nil-rating) to provide to the home buyer.

As such the Rochford policy requirement that coding 3 be achieved by 2010 and Code 6 by 2013 is out of step with Government advice. The policy wording should explain that it is just the coding that is a requirement of new homes and not necessarily that new homes should be constructed to achieve a standard.

The current Government objectives are for the code to be introduced over a reasonable period with development to be code 3 by 2010, code level 4 by 2013 and code level 5 by 2016. In this regard the policy, as drafted, seeks to achieve code 6 by 2013 and consequently compresses the code requirements into a shorter time scale with the costs associated expected to be subsumed within the housing market through higher prices. This is not a realistic strategy for the delivery of sustainable homes and we consider that the policy should be revised to extend the period of compliance but to also make it more flexible based on local circumstances.

Research undertaken on behalf of the Housing Corporation and English Partnerships, published in February 2007 'A cost review of the code for sustainable homes' reveals that code 6 is unlikely to be unattainable given existing technologies and that achieving code 5 could result in a 12% to 20% increase in costs that would have to be passed onto the consumer. Given the variability of the housing market with peaks and troughs, it is unlikely that the housing market would be able to subsume this level of price increase.

The code system policy as currently drafted does not have regard to site circumstances and so many of the requirements could be difficult to meet. For example, micro electricity generation on site may be difficult to achieve where local circumstances deter the capture of wind or solar power. If more expensive technologies are required to generate power than is the norm then costs will rise. There may be other competing reasons why designs cannot include certain sustainability measures if housing sites are in sensitive landscape and historic locations. Alternatively there may be significant development costs associated with site specific circumstances and so viability of the site's development becomes a valid consideration. By insisting on the code for sustainable homes other policy objectives such as affordable housing at particular rates and other contributions may need to be reconsidered. Consequently, we are of the view that this policy should be drafted in a manner which enables site specific circumstances to be taken into account. As noted above the Government explains that the code is a certification requirement and does not necessarily mean that buildings are constructed in accordance with a code level.

It is also important to note that it is not the purpose of planning legislation to duplicate other legislation. In this regard, the policy should accept that the Building Regulations will be the main vehicle for implementing this policy and that unless the coding requires external development then there will be no need to specify what is to be carried out in a planning application.

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O - 16919 - 10009 - Policy H2 - Extensions to residential envelopes and phasing - iii

16919 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Summary: Issues raised with regard to the Council's 5 year housing supply assessment.
Please see full submission for comments relating to Policy H2.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** iii

Core Strategy Submission Document

O - 16932 - 8480 - Policy H2 - Extensions to residential envelopes and phasing - i

16932 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr Philip Botfield [8480]

Agent: N/A

6 Thorpe Road
Hawkwell
Hockley
Essex
SS5 4EP

Full Text: Dear Councillor Hudson

As a local resident for many years, I strongly object to any development in the area. The land you have outlined for building is green belt, maintaining a rural community and one of the reasons I moved to the area in the first place. Should I have wanted to live in a more densely populated conurbation I would have moved else where.

Over the years the amount of residents that use Thorpe Road has more than doubled; Thorpe Close, Thorpe Gardens and Spencers were new developments that have all been approved, thus making Thorpe Road more than twice as busy as originally intended. For this very reason, I strongly object to any access via Thorpe Road yet again. The amount of traffic will affect my quality of life - changing what is currently a peaceful cul-de-sac in to a busy development.

For the reasons above, I believe that any decision to allow housing on green belt is unsound and would result in the destruction of woodland and existing wildlife. I request you have consideration for existing residents and do not allow further development of Thorpe Road.

Summary: I believe that any decision to allow housing on green belt is unsound and would result in the destruction of woodland and existing wildlife. I request you have consideration for existing residents and do not allow further development of Thorpe Road.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16937 - 7801 - Policy H2 - Extensions to residential envelopes and phasing - i, ii, iii

16937 Object

CHAPTER 4 Policy H2 - Extensions to residential envelopes and phasing

Respondent: Mr G Marshall [7801]

193 Southend Road
Rochford
Essex

SS4 1JD

01702 541437

Agent: Generis Planning (Mr T Dodkins) [5081]

Generis Planning
Timber Thatch
Snow Hill
Great Easton
Dunmow
Essex

CM6 2DR

01371 870169

Full Text: Please see attached statement

Council ref AE32

Summary: Please see attached statement

Council ref AE32

Change to Plan Please see attached statement

Appear at exam? Yes

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 15730 - 14014 - Extension to residential envelopes post-2021 - i, ii

15730 Object

CHAPTER 4 Extension to residential envelopes post-2021

Respondent: mr frank harvey [14014]

19 hockley rise
hockley
ss5 4pt

Agent: N/A

Full Text: unsound because the vital requirements pps 12 are not met because of unsustainability
TRAVEL-- limited public transport
increased car use causing even more congestion/pollution
inability to improve highways
distance from shops
distance from train stations
ENVIRONMENT--semi rural location unsuitable for large development
complete loss of character
loss of green belt
loss of wildlife
NO social, economic or environmental benefits whatsoever

Summary: unsound because the vital requirements pps 12 are not met because of unsustainability
TRAVEL-- limited public transport
increased car use causing even more congestion/pollution
inability to improve highways
distance from shops
distance from train stations
ENVIRONMENT--semi rural location unsuitable for large development
complete loss of character
loss of green belt
loss of wildlife
NO social, economic or environmental benefits whatsoever

Change to Plan move allocation to a more sustainable location

Appear at exam? No **Soundness Tests** i, ii

Core Strategy Submission Document

O - 15699 - 7840 - Extension to residential envelopes post-2021, 4.24 - i

15699 Object

CHAPTER 4 Extension to residential envelopes post-2021, 4.24

Respondent: Mrs Jane McClure [7840]

230 Hockley Road
Rayleigh
Essex
SS6 8EU
01268771971

Agent: N/A

Full Text: I have lived in Rayleigh for over forty years and in that time, Rayleigh has morphed from a small pleasant market town into a developers free for all in building. This has resulted in loss of green space, loss of schools (knocking down Park School to build more houses - surely more schools not less??), traffic jams, lack of school space, overcrowded trains, doctors and dentists.

Why is it that Rayleigh gets all the housing whereas Rochford, Ashington and the outlying areas appear to stay green and pleasant areas??

Ironically, Rochford is a much smaller town than Rayleigh but manages to keep all the amenities around Rochford to the detriment of Rayleigh. Rochford Town Centre remains quaint with most of the old buildings renovated whereas Rayleigh's quaintness has been obliterated by the same Council...

Summary: Over-development of housing in Rayleigh resulting in loss of farmland, green spaces and pressure on existing NHS, educational resources and traffic on roads.

Change to Plan Look at other areas within the Rochford area as Rayleigh no longer has the capacity to ease Rochford Council's problem with housing - Ashington and Canewdon have plenty of farmland that could be utilised instead.

Appear at exam? No

Soundness Tests i

Core Strategy Submission Document

O - 15844 - 14081 - Extension to residential envelopes post-2021, 4.24 - i

15844 Object

CHAPTER 4 Extension to residential envelopes post-2021, 4.24

Respondent: Mr Arthur John Gamman [14081]

Agent: N/A

55, Mortimer Road,
Rayleigh
Essex
SS6 9NU
UK
01268784535

Full Text: The H2 plan to increase housing (550 dwellings) North of London Road, Rayleigh with Rawreth Lane at saturation point (traffic at 17:00 is at a standstill Monday-Friday) is totally unfounded and at all costs be stopped. This road is the only approved road to Hullbridge and other villages, how will this work when at least another 1,000 vehicles will be using it when the extra houses are built. Does not make any sense?

Summary: The H2 plan to increase housing (550 dwellings) North of London Road, Rayleigh with Rawreth Lane at saturation point (traffic at 17:00 is at a standstill Monday-Friday) is totally unfounded and at all costs be stopped. This road is the only approved road to Hullbridge and other villages, how will this work when at least another 1,000 vehicles will be using it when the extra houses are built. Does not make any sense?

Change to Plan Look for an area where road conditions can cope.

Appear at exam? No **Soundness Tests** i

Core Strategy Submission Document

O - 16231 - 8065 - Extension to residential envelopes post-2021, 4.24 - i

16231 Object

CHAPTER 4 Extension to residential envelopes post-2021, 4.24

Respondent: Bull Lane Development Group (Mrs Pamela Watson Jones) [8065] **Agent:** N/A

Bull Lane Development Group
68 Windermere Ave
Hullbridge
Essex
SS5 6JT
U K
01702 232376

Full Text: Additional housing for North of London Road Rayleigh is not the most viable, proposed with additional housing in Hullbridge brings traffic to an unsustainable level. PPS12 applies. See LDF Oct 2008 H2 p29 states there is a need to avoid the coalescence of Rayleigh with Hullbridge..
Proposal of adding a roundabout & cycle path at Hullbridge together with straightening Watery Lane to go safely to and from where?? is not be the answer.

Rayleigh lacks mixture of shops without travel.

Summary: Additional housing for North of London Road Rayleigh is not the most viable, proposed with additional housing in Hullbridge brings traffic to an unsustainable level. PPS12 applies. See LDF Oct 2008 H2 p29 states there is a need to avoid the coalescence of Rayleigh with Hullbridge..
Proposal of adding a roundabout & cycle path at Hullbridge together with straightening Watery Lane to go safely to and from where?? is not be the answer.

Rayleigh lacks mixture of shops without travel.

Change to Plan No houses to be built at North of London Road, Rayleigh.
Additional housing in Hullbridge only if road safety has been monitored prior to decisions.
Considerations to the soundness of Watery Lane with a cycle path needs to be proved.

Appear at exam? No **Soundness Tests** i

Core Strategy Submission Document

O - 16349 - 8267 - Extension to residential envelopes post-2021, 4.24 - ii

16349 Object

CHAPTER 4 Extension to residential envelopes post-2021, 4.24

Respondent: Aber Ltd [8267]

Aber Ltd
C/o Agent

Agent: Colliers CRE (Mr S Chapman) [8266]

Colliers CRE
9 Marylebone Lane
London
W1U 1HL
020 7344 6533

Full Text:

To ensure that an adequate five year supply, a flexible approach needs to be adopted with regards the timing and release of land for residential development. In light of the current economic climate sites that are identified for the period up to 2021, may not come forward for a variety of reasons and need to be augmented by site(s) identified in period post 2021 in order to maintain the 15 year supply. The sites for the period post 2021 should also be delineated in the Allocations Development Plan Document.

The objective of the Local Development Framework is not just about allocating sufficient land to provide new homes but is about ensuring that, subject to the prevailing market conditions, allocations will actually deliver the required amount of housing over the plan period. This relies largely on allocating sites where there is a real prospect (available, suitable and achievable), of delivery within the anticipated timescale. It also requires a mechanism to ensure that sufficient sites are brought forward at the right time to enable delivery.

This approach is consistent with the guidance contained within Planning Policy Statement 3 (PPS3) which advocates local planning authorities maintain a flexible and responsive supply of housing land that reflects the 'Plan, Monitor, Manage' approach. This supports the need for a clear policy approach that indicates the timing of potential housing sites in relation to the housing trajectory and the 5 year supply of land. In addition, to the 5 year supply of deliverable land, PPS3 also requires a further supply of specific, developable sites for years 6-10 and where possible, years 11-15. Sufficient sites will therefore be allocated up to 2026 to meet the 15 year requirement in PPS3. In the event that the market does not deliver sufficient homes to meet requirements, sites will need to be brought forward from future year's allocations to ensure housing delivery targets are met.

As we are currently in a period of recession it is not unreasonable that some of the sites allocated in the early years of the 15 year supply may not come forward as for a combination of reasons the sites may no longer be deliverable (eg no longer available and/or achievable). In addition, it is necessary to provide private housing in order to ensure that the associated/linked affordable housing is also provided.

Therefore, in order to ensure that a continuous 5 year supply is maintained it may be necessary for sites identified in future years to be brought forward and to ensure this happens these sites should also be specifically delineated on the Proposals Map, which accompanies the Allocations Development Plan Document.

Paragraph 4.24 - amend as follows:

In considering the general development locations for post-2021 development, the same issues as for Policy H2 above have been considered. These sites have been assessed for their ability to be delivered early to compensate for any shortfall in the pre-2021 site. The assessment will include a review of available infrastructure and the impact on existing communities to ensure that their early delivery would be appropriate.

Summary:

To ensure that an adequate five year supply, a flexible approach needs to be adopted with regards the timing and release of land for residential development. In light of the current economic climate sites that are identified for the period up to 2021, may not come forward for a variety of reasons and need to be augmented by site(s) identified in period post 2021 in order to maintain the 15 year supply. The sites for the period post 2021 should also be delineated in the Allocations Development Plan Document.

The objective of the Local Development Framework is not just about allocating sufficient land to provide new homes but is about ensuring that, subject to the prevailing market conditions, allocations will actually deliver the required amount of housing over the plan period. This relies largely on allocating sites where there is a real prospect (available, suitable and achievable), of delivery within the anticipated timescale. It also requires a mechanism to ensure that sufficient sites are brought forward at the right time to enable delivery.

This approach is consistent with the guidance contained within Planning Policy Statement 3 (PPS3) which advocates local planning authorities maintain a flexible and responsive supply of housing land that reflects the 'Plan, Monitor, Manage' approach. This supports the need for a clear policy approach that indicates the timing of potential housing sites in relation to the housing trajectory and the 5 year supply of land. In addition, to the 5 year supply of deliverable land, PPS3 also requires a further supply of specific, developable sites for years 6-10 and where possible, years 11-15. Sufficient sites will therefore be allocated up to 2026 to meet the 15 year requirement in PPS3. In the event that the market does not deliver sufficient homes to meet requirements, sites will need to be brought forward from future year's allocations to ensure housing delivery targets are met.

Core Strategy Submission Document

O - 15700 - 7840 - Extension to residential envelopes post-2021, 4.28 - i

15700 Object

CHAPTER 4 Extension to residential envelopes post-2021, 4.28

Respondent: Mrs Jane McClure [7840]

230 Hockley Road
Rayleigh
Essex
SS6 8EU
01268771971

Agent: N/A

Full Text: why the delay in building in these areas instead of the previously mentioned area in Rayleigh. Surely these areas are the most urgent not Rayleigh who has taken most of the building developments in South East Essex especially in the last twenty five years.

Summary: why the delay in building in these areas instead of the previously mentioned area in Rayleigh. Surely these areas are the most urgent not Rayleigh who has taken most of the building developments in South East Essex especially in the last twenty five years.

Change to Plan change this policy and speed up Great Wakering and Ashingdon's development and put Rayleigh's on ice.

Appear at exam? No

Soundness Tests i

Core Strategy Submission Document

O - 16250 - 9177 - Extension to residential envelopes post-2021, 4.28 - i

16250 Object

CHAPTER 4 Extension to residential envelopes post-2021, 4.28

Respondent: Colonnade Land LLP [9177]

Colonnade Land LLP
Fifth Floor
17-19 Maddox Street
London
W15 2QH
020 7255 7490

Agent: Icen Projects Limited (David Churchill) [10057]

Icen Projects Limited
83 Victoria Street
London
SJ1H 0HW

Full Text: ROCHFORD DISTRICT COUNCIL - LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY SUBMISSION
SEPTEMBER 2009

Icen Projects Ltd (Icen) has been instructed by Colonnade Land LLP (Colonnade) to submit representations to the Rochford Local Development Framework Core Strategy Submission (CSS).

a) Overview

It is our conclusion that the CSS is not justified, effective or consistent with national policy, as required by Planning Policy Statement 12: Creating Strong Safe and Prosperous Communities through Local Spatial Planning (PPS12) and is therefore vulnerable to being found unsound by an Inspector through the Examination in Public.

b) Background and Summary

These representations follow those made by Icen on behalf of Colonnade to the Preferred Options Core Strategy, submitted via letter dated 17 December 2008. In this regard, we would request that the Council confirms that the representations made to the Preferred Options Core Strategy will be taken into account alongside the current representations, particularly as there are a number of cross references between the two sets of representations.

It is not considered necessary to reiterate the content of the previous representations, as they were made at the appropriate stage and will be considered by the Planning Inspectorate in due course, but it is inevitable that certain elements will require restating where it is not clear that they have been taken into account in the production of the CSS. For clarity, therefore, Colonnade feel that it is appropriate to clarify the 'in-principle' issues that were raised in the representations to the Preferred Options Core Strategy, recognising that these issues were raised in the context of a wider and more coherent justification made within the representations:

- â€¢ Further cross-referencing of the recommendations made within the evidence base is required;
- â€¢ Greater focus should be placed on promoting Rochford as the principal settlement within the District;
- â€¢ Coombes Farm is the most logical location for residential development abutting the urban area of Rochford and as such warrants recognition as a general location for residential development;
- â€¢ The allocation of Three Ashes Farm for employment generating uses will be pursued;
- â€¢ Recognition that it is not realistic to expect residential allocations to be met mainly on Brownfield sites, nor should the intensification of smaller sites in residential areas be pursued;
- â€¢ Many of the sites identified as suitable for residential development will not be viable and will not come forward for development within the timescales anticipated;
- â€¢ The failure to provide the necessary justification for the proposed infrastructure improvements sought in Appendix H1;
- â€¢ The inclusion of an affordable housing exception policy was sought; and
- â€¢ The need to identify sites capable of delivering employment growth in the short term.

Following assessment of the CSS presented by the Council for consultation prior to submission to the Secretary of State, Colonnade considers the Plan to be 'unsound' as the document consistently fails to meet the tests of soundness set out in the table following Paragraph 4.52 of PPS12. For clarity, PPS12 confirms that to be 'sound' a Core Strategy should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY and defines 'justified' as "founded on a robust and credible evidence base" and "the most appropriate strategy when considered against the reasonable alternatives" and 'effective' as "deliverable", "flexible" and "able to be monitored".

The rationale for the above is identified in the remainder of these representations, which are provided in the interests of ensuring the Council delivers a strong, robust and logical Core Strategy that guides the future development of the District in a justified and effective manner.

b) Colonnade

As the Council is aware from previous submissions to the Local Development Framework, Colonnade is a strategic land company with a particular interest in the future development of the District as a consequence of a number of sites that it controls, particularly around Rochford.

The Council will also be aware that Colonnade has recently submitted an outline planning application for the residential development of the land at Coombes Farm, Rochford to provide a sustainable urban extension comprising up to 326

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residential dwellings, with associated accesses and community uses. Whilst the planning application process is clearly separate from the Local Development Framework production process, Colonnade wishes to continue the promotion of the site as a suitable location for residential development.

Accordingly, these representations focus on the legal requirements and tests of soundness associated principally with the Housing and Employment chapters of the CSS, with reference where appropriate to the sites that are controlled by Colonnade, the outline planning application at Coombes Farm and other issues where relevant.

c) Housing

i. Date of Adoption

The CSS assumes an adoption date of 2010 and plans for the provision of housing to 2025.

Taking account of the potential delays to the adoption of the Plan, including the Examination process, it would be more appropriate for the CSS to provide sufficient flexibility to allow for delays in its adoption. Colonnade considers an adoption date of 2011 for the CSS is a more realistic target.

Taking account of the advice in Paragraph 4.13 of PPS12, which states that the time horizon for the Core Strategy should be "at least 15 years from the date of adoption" it would be appropriate for the CSS to plan for the provision of housing to 2026 at the earliest. As such, Colonnade does not consider the CSS to be 'flexible' in the context of the tests of soundness in the table following Paragraph 4.52 of PPS12.

ii. Housing Delivery

However, setting the above aside, the Housing Chapter identifies the minimum housing delivery target for the period 2001 to 2021 of 4,600 dwellings as set out in the East of England Plan, with the annual average requirement of 250 dwellings per annum to extend provision from 2021 to 2025. It also confirms that the residual target for the period 2006 to 2021 is 3,790 dwellings, taking account of the delivery of 810 dwellings in the period 2001 to 2006, and a further 618 dwellings have been completed between 2006 and 2008.

This leaves a residual housing provision target of a minimum of 3,172 dwellings in the period 2008 to 2021. Taking into account the required provision beyond 2021, the residual housing provision target in the period 2008 to 2025 is a minimum of 4,172 dwellings. The disparity between these figures and those provided within the CSS are explained by the rounding down of the annual average delivery requirement in the period 2006 to 2021 to 250 dwellings per annum, compared with the actual figure of 252.67.

The table at Paragraph 4.6 of the CSS identifies the source of housing provision that will meet the identified minimum requirements and includes figures for 'Extant Planning Permissions' and 'Existing allocations/other appropriate sites identified in Strategic Housing Land Availability Assessment'. These figures, along with the actual completions within the period are combined to produce the figure for the 'Total without Green Belt release' figure.

Setting aside the concern regarding under-provision associated with the rounding down of the annual average delivery requirement in the period 2006 to 2021, the CSS fails to identify the sites that will contribute to the 'Extant Planning Permissions' provision. The identification of the sites that will contribute to the 'Extant Planning Permissions' should be provided in the context of the findings of the Inspector in the appeal by Asprey Homes [APP/G5180/A/07/2043219/NWF] who determined that the reliance on a delivery rate of 100% is unsafe [IR287].

Furthermore, at the time of writing these representations, the Strategic Housing Land Availability Assessment 2009 has not been published. It is impossible therefore for a full assessment of the proposed housing provision to be undertaken to confirm whether the CSS is 'founded on a robust and credible evidence base' [test of soundness in the table following Paragraph 4.52 of PPS12].

iii. Redevelopment of Employment Sites

Paragraph 4.14 of the CSS refers to the identification of the four employment sites that are considered by the Council to be suitable for redevelopment to residential use. However, the failure to publish the Strategic Housing Land Availability Assessment 2009 either before or alongside the publication of the CSS means that the assumptions made by the Council as to the suitability, availability, viability and deliverability of the sites cannot be assessed.

It has been necessary, therefore, to review the assumptions made in the Rochford Urban Capacity Study 2007 (UCS) regarding the sites. Within the section of the UCS entitled 'Redevelopment of Established Employment Land' [pages 22 & 23] includes a list of those sites assessed, their indicative capacities and the probability of residential development coming forward at the sites within the plan period (identified elsewhere as 2001 - 2021). The list includes the four sites identified in the CSS of Eldon Way/Foundry Estate, Hockley; Rawreth Lane Industrial Estate, Rayleigh; Stambridge Mills; and Star Lane Industrial Estate, Great Wakering.

In total, the UCS identifies an indicative residential redevelopment capacity of 486 units on the four sites (118, 220, 60 and 88 respectively). Of these, it identifies the Rawreth Lane Industrial Estate and Stambridge Mills as having a 'high'

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probability of coming forward for development in the Plan period (2001 - 2021), which would deliver 280 residential dwellings using the Council's own figures. The Star Lane Industrial Estate (referred to in the UCS as the Star Lane Brickworks) is identified as having a 'medium' probability of coming forward for development in the Plan period, with capacity to deliver 88 residential dwellings. It is unclear, therefore, where the figure for 'Existing allocations/other appropriate sites identified in Strategic Housing Land Availability Assessment'.

Set against this is the identification of these four sites in the CSS as being capable of delivery for residential development within the Plan period, with 671 units delivered between 2006 and 2015 and a further 506 units between 2015 and 2021.

The UCS also states in the same section that:

"There are considerable areas of land in the district that are currently allocated for, and in use as, employment land. The redevelopment of such sites for residential use would reduce demand for residential development on greenfield sites, but would at the same time create a need for alternative sites to be found for employment. Such an approach, which would be likely to require the decontamination of existing employment land to make it fit for residential use, together with development of a greenfield site and implementation of additional infrastructure to serve the new employment area, may well be unsustainable." [our emphasis]

The UCS appears to confirm therefore, that not only would the redevelopment of the four sites listed in the CSS be unlikely within the Plan period, but also potentially unsustainable. In this regard, it is notable that the promoters of Stambridge Mills sought the Screening Opinion of the Council as to whether Environmental Impact Assessment of the planning application for the redevelopment of the site for residential use was required in 2007, but to date are yet to submit a planning application for the redevelopment of the site.

In light of this, Colonnade does not consider the CSS is 'the most appropriate strategy when considered against the reasonable alternatives' [test of soundness in the table following Paragraph 4.52 of PPS12], which include the provision of residential development in East Rochford.

iv. Strategic Housing Growth to the East of Rochford

Furthermore, whilst paragraph 2.62 of the CSS identifies concern relating to the identification of locations to the east of Rochford for development on the basis that 'vehicular movements would inevitably be directed through Rochford's historic core', the CSS later identifies Stambridge Mills as a suitable site for residential redevelopment.

In light of the evident conflicts between the evidence base provided in support of the CSS and the absence of other evidence, the CSS is not considered 'sound' in the context of the tests of soundness in the table following Paragraph 4.52 of PPS12.

v. Housing Trajectory

Paragraph 4.28 of the CSS confirms that policies H1, H2 and H3 of the CSS will deliver housing supply as illustrated in the Housing Trajectory at Appendix H2. This Housing Trajectory is transposed from the 2008 Annual Monitoring Report (AMR).

Whilst on the face of it, the Housing Trajectory appears to confirm that the Council can meet its requirement to identify a five year housing supply, many of the sites identified within the AMR do not conform to the guidance issued by CLG in August 2008, on the assessment of a five year land supply. The guidance identifies sites that can be included within the five year assessment of housing supply as:

"those that are allocated for housing in the Development Plan, sites that have planning permission (outline or full planning permission that has not been implemented) and specific, unallocated brownfield sites that have the potential to make a significant contribution to housing delivery during the 5 year period".

Table 4.10: Projected Net Completions of the AMR confirms that the five year housing land supply figure includes sites from 'other land allocated for residential purposes', which are based on land allocations outside existing settlements. However, it should be clarified that these land allocations are not currently allocated for housing development in an adopted Development Plan. As such, these unallocated greenfield sites that are yet to make significant progress through the planning system should be discounted and the five year housing land supply recalculated.

The table below has been prepared to confirm the extent of the shortfall should the sites from 'other land allocated for residential purposes' be removed from the calculation of the Rochford five year housing land supply, in accordance with the guidance issued by CLG:

Recalculated Five Year Housing Land Supply (2009 - 2014):

Year
1st April 2009 to 31st March 2010
Predicted Delivery (A)

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106 dwellings
Allocations on 'other land allocated for residential purposes' (B)
0
Residual delivery (A-B)
106 dwellings
Delivery Shortfall
0

Year
1st April 2010 to 31st March 2011
Predicted Delivery (A)
217 dwellings
Allocations on 'other land allocated for residential purposes' (B)
150
Residual delivery (A-B)
67 dwellings
Delivery Shortfall
150

Year
1st April 2011 to 31st March 2012
Predicted Delivery (A)
544 dwellings
Allocations on 'other land allocated for residential purposes' (B)
300
Residual delivery (A-B)
244 dwellings
Delivery Shortfall
300

Year
1st April 2012 to 31st March 2013
Predicted Delivery (A)
395 dwellings
Allocations on 'other land allocated for residential purposes' (B)
375
Residual delivery (A-B)
20 dwellings
Delivery Shortfall
375

Year
1st April 2013 to 31st March 2014
Predicted Delivery (A)
300 dwellings
Allocations on 'other land allocated for residential purposes' (B)
300
Residual delivery (A-B)
0 dwellings
Delivery Shortfall
300

TOTAL

Predicted Delivery (A)
1,562 dwellings

Allocations on 'other land allocated for residential purposes' (B)
1,125 dwellings

Residual delivery (A-B)
437 dwellings

Delivery Shortfall
1,125 dwellings

The above table confirms that the removal of the 'other land allocated for residential purposes' from the calculation of the Rochford five year housing land supply leaves the Council with a minimum net additional housing delivery of 437 dwellings, which equates to a supply of 1.7 years based on the adjusted annual delivery target of a minimum of 255 net

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additional dwellings per annum. As such, the Council is failing to meet its requirement to demonstrate a five year housing land supply in accordance with PPS3 and the supporting guidance provided by CLG. It is notable that the recent application by David Wilson Homes at Land between Main Road and Rectory Road and Clements Hall Way, Hawkwell identifies an even greater shortfall in the Council's five year housing land supply.

In addition to the above, the AMR does not include a commentary on how deliverability has been assessed against the requirements of paragraph 54 of PPS3.

Furthermore, the guidance from CLG confirms that the windfall sites cannot be relied upon in demonstrating a five year supply unless a Local Planning Authority can demonstrate genuine local circumstances exist to allow this exception. However, the second paragraph of the section entitled 'Housing Trajectory and Five Year Housing Supply' confirms that the estimated completions in the years 2008 to 2013 includes estimated yields through 'intensification' coming forward in future years. With reference to the definition of 'intensification' on page 13 of the AMR, it appears that the 'Housing Trajectory and Five Year Housing Supply' also includes provision for windfall sites. As such, the Council is required to demonstrate the 'genuine local circumstances exist to allow this exception'.

The pressures on delivery and need for additional sites are more acute when it is considered that an average delivery rate of 204 dwellings per annum was achieved during a strong period of housing market growth. In view of the current economic downturn, and significant problems faced within the housing market, the Council should seek to identify appropriate and deliverable sites to meet its regional housing target provision commitments. Suitable sites would include Coombes Farm, which has been positively promoted for development through the LDF process.

It may, therefore, be more appropriate for the Council not merely to allocate sufficient sites to meet the minimum targets set down by the East of England Plan, but to identify a reservoir of land capable of coming forward for development should the sites identified through the CSS and Allocations Development Plan Documents (DPD) fail to come forward for development within the anticipated timescales.

vi. Appendix H1

As set out in the representations to the Preferred Options Core Strategy, there is continuing concern that the list of improvements to infrastructure required in support of residential development as set out in Appendix H1 fails to provide the necessary justification for its inclusion. Whilst the preamble seeks to clarify why the infrastructure is sought, the inclusion of this list should be fully justified, otherwise it is of little value. Furthermore, it would be of benefit to provide further details of the existing community infrastructure provision and capacity within the evidence base.

The failure to provide the necessary justification for its inclusion means that the CSS will not be 'founded on a robust and credible evidence base' [test of soundness in the table following Paragraph 4.52 of PPS12].

d) Character of Place

As set out in the representations to the Preferred Options Core Strategy, Colonnade considers that, with respect to the requirement to produce and adhere to Development Briefs for large residential developments, as set out in Policy CP1, the Council should not seek to impose further demands on developers where existing regulations provide sufficient requirements regarding design. In this instance, Design and Access Statements provide sufficient design guidelines for developments and there is no additional information provided in the policy or supporting text that clearly sets out the justification for this requirement.

e) Green Belt

□

With reference to the comments regarding the redevelopment of employment sites under the 'Housing' section above and the requirement to allocate sufficient land to meet the minimum housing provision targets as required by the East of England Plan, Colonnade considers that the chapter on Green Belt, and policy GB1 in particular, fails to provide the necessary evidence base that will allow it to be monitored effectively.

It is inherent that the proposed redevelopment of previously developed employment sites for residential use in order to reduce the requirement to allocate previously undeveloped land for residential use will displace these employment uses. In turn, therefore, the separate allocation of previously undeveloped Green Belt to accommodate the compensatory employment provision is required. This is accepted in principle at paragraph 11.11 of the CSS.

Without providing clarification of the anticipated quantum of land required to accommodate the provision of housing and compensatory and new employment land, it is not possible to monitor the performance of policy GB1.

However, using the Council's figures in the table setting out the breakdown of the housing provision figures in Chapter 4 of the CSS (assuming that actual completions and extant permissions are all on previously developed land), setting aside the displacement of employment uses referred to above, approximately 42% of the required minimum housing provision target is capable of being accommodated on previously developed land (2,005 units from a total of 4,750). As such, the Council is required to provide at least 58% of the required minimum housing provision target on the Green Belt (2,745 units from a total of 4,750).

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If these figures are adjusted to take account of the displacement of employment uses (assuming the provision of an equal quantity of land is required to compensate for the employment land that is redeveloped), this figure changes to 17.5% on previously developed land and 82.5% on Green Belt (828 and 3,922 units from a total of 4,750 respectively). Even allowing for the achievement of higher densities of employment on new developments, the figures above are unlikely to change significantly.

Furthermore, the table in Chapter 4 also confirms that no previously developed land will be available for development beyond 2021, or 2015 if account is taken of the displacement of the employment uses.

In light of this, not only does Chapter 6 fail to provide the necessary evidence base that will allow it to be monitored effectively, it is also necessary to consider whether it presents the most appropriate strategy for addressing the required release of Green Belt land to accommodate the defined housing and employment delivery targets to 2025 and beyond as necessary. Colonnade considers a more robust approach that is flexible and capable of being monitored, would be to clearly identify those sites capable of delivery in the short term, which for the avoidance of doubt includes those sites being promoted by Colonnade, with a reservoir of alternative sites set aside for future growth.

As set out in the representations to the Preferred Options Core Strategy, Colonnade considers that the inclusion of an affordable housing exception policy within the CSS will aid the delivery of community housing within rural areas. However, the CSS does not contain such a policy, or adequately address the issue of community housing within rural areas and the CSS is not considered to provide sufficient flexibility to allow for the delivery of essential rural housing.

f) Environmental Issues

Colonnade has concerns regarding the justification for and effectiveness of a number of the policies contained within the Environmental Issues chapter, as follows:

â€¢ Policy ENV1: The Council fails to identify how it will "maintain, restore and enhance" the sites of nature conservation importance that are identified, or how the performance of this policy will be monitored;

â€¢ Policy ENV3: In the context of the advice at paragraph 4.32 of PPS12 regarding the reformulation of national policies, Colonnade does not consider that this policy is required; and

â€¢ Policy ENV9: As set out in the representations to the Preferred Options Core Strategy, Colonnade does not consider that the necessary evidence base has been provided to justify a policy that seeks to go above and beyond the policy targets for the Code for Sustainable Homes as set out by Central Government.

g) Community Infrastructure, Leisure and Tourism

Policy CLT1 refers to the requirement for residential and employment development to contribute to the infrastructure identified in Appendix CLT1 through Standard Charges.

However, whilst the general principle of securing planning obligations through the application of standard charges is broadly accepted, the list of infrastructure requirements set out in Appendix CLT1 is not supported by sufficient evidence base to identify its robustness and credibility. As such, Colonnade does not consider either policy CLT1 or Appendix CLT1 is justified in the context of PPS12.

It is also noted that, despite the clarification sought by Colonnade at the Core Strategy Preferred Options stage, the CSS fails to confirm what information should be contained within Health Impact Assessments, which are required by policy CLT4. Once again, Colonnade requests further clarification of what is involved in the assessment and the expected outputs, which will provide greater clarity and will allow the policy to be monitored.

h) Transport

Policy T8 confirms that the Council will apply minimum parking standards. As set out in the representations to the Preferred Options Core Strategy, the guidance in Planning Policy Guidance Note 13: Transport (PPG13) is clear regarding the imposition of parking standards.

Paragraphs 52-56 of PPG13 confirm that the Local Planning Authorities should apply maximum not minimum parking standards. In order to satisfy the legal requirements set out in PPS12, the policy must reflect PPG13 to promote sustainable transport choices and further provide incentives for developers to locate further residential land closer to local service centres by requiring maximum parking standards for residential developments.

i) Economic Development

As set out in the representations to the Preferred Options Core Strategy, the land at Three Ashes Farm provides an excellent opportunity to deliver employment growth in the short term and may be a suitable site for the 'Eco-Innovation Centre' that is being promoted by the Council. Its identification as a suitable location for strategic employment growth, or the provision of an Eco-Innovation Centre, would accord with the general principles of the policies contained within Chapter 11.

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The identification of Purdeys Industrial Estate as fit for purpose (in paragraph 11.32 and the Council's 2008 Employment Land Study 2008) and therefore it should be maintained and if possible expanded, is welcomed and Colonnade considers that Three Ashes Farm could deliver this expansion, providing a natural extension to Purdeys Industrial Estate and being strategically located close to the Airport.

Three Ashes would address the negative impacts that the nearby residential area experiences from the existing Industrial Estate by providing a buffer between established uses and the residential area with less intensive employment activities. The highways analysis that has been carried out has suggested that it would not have an adverse impact on roads and congestion. Furthermore, there are very few opportunities for businesses to expand and Three Ashes could provide this opportunity.

j) Conclusions

Following the submission of representations to the Preferred Options Core Strategy, Colonnade is disappointed to note that the CSS fails to take account of the majority of the issues raised in their representations.

In addition, Colonnade considers the plan to be 'unsound' as the document consistently fails to meet the tests of soundness set out in the table following Paragraph 4.52 of PPS12 and respectfully requests that the Council notifies Icen, on behalf of Colonnade, of the future arrangements for the Examination of the Core Strategy. Furthermore, Colonnade wishes to take this opportunity to formally register a request to appear at all stages of the Examination in Public, including the pre-hearing meeting and any planned hearing sessions whereby issues raised in the context of this letter are to be discussed. Please confirm this request, and that the representations made to the Preferred Options Core Strategy will be taken into account alongside the current representations, by way of return to this letter.

Icen Projects, on behalf of Colonnade Land LLP trusts that the Council will find these representations to be constructive and helpful in taking forward the Core Strategy. Should you wish to discuss any aspect of these representations further, please do not hesitate to contact us.

Summary:

v. Housing Trajectory

Paragraph 4.28 of the CSS confirms that policies H1, H2 and H3 of the CSS will deliver housing supply as illustrated in the Housing Trajectory at Appendix H2. This Housing Trajectory is transposed from the 2008 Annual Monitoring Report (AMR).

Whilst on the face of it, the Housing Trajectory appears to confirm that the Council can meet its requirement to identify a five year housing supply, many of the sites identified within the AMR do not conform to the guidance issued by CLG in August 2008, on the assessment of a five year land supply. The guidance identifies sites that can be included within the five year assessment of housing supply as:

"those that are allocated for housing in the Development Plan, sites that have planning permission (outline or full planning permission that has not been implemented) and specific, unallocated brownfield sites that have the potential to make a significant contribution to housing delivery during the 5 year period".

Table 4.10: Projected Net Completions of the AMR confirms that the five year housing land supply figure includes sites from 'other land allocated for residential purposes', which are based on land allocations outside existing settlements. However, it should be clarified that these land allocations are not currently allocated for housing development in an adopted Development Plan. As such, these unallocated greenfield sites that are yet to make significant progress through the planning system should be discounted and the five year housing land supply recalculated.

The table below has been prepared to confirm the extent of the shortfall should the sites from 'other land allocated for residential purposes' be removed from the calculation of the Rochford five year housing land supply, in accordance with the guidance issued by CLG:

Recalculated Five Year Housing Land Supply (2009 - 2014):

Year
1st April 2009 to 31st March 2010
Predicted Delivery (A)
106 dwellings
Allocations on 'other land allocated for residential purposes' (B)
0
Residual delivery (A-B)
106 dwellings
Delivery Shortfall
0

Year
1st April 2010 to 31st March 2011
Predicted Delivery (A)

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16250 Object

CHAPTER 4 Extension to residential envelopes post-2021, 4.28

217 dwellings
Allocations on 'other land allocated for residential purposes' (B)
150
Residual delivery (A-B)
67 dwellings
Delivery Shortfall
150

Year
1st April 2011 to 31st March 2012
Predicted Delivery (A)
544 dwellings
Allocations on 'other land allocated for residential purposes' (B)
300
Residual delivery (A-B)
244 dwellings
Delivery Shortfall
300

Year
1st April 2012 to 31st March 2013
Predicted Delivery (A)
395 dwellings
Allocations on 'other land allocated for residential purposes' (B)
375
Residual delivery (A-B)
20 dwellings
Delivery Shortfall
375

Year
1st April 2013 to 31st March 2014
Predicted Delivery (A)
300 dwellings
Allocations on 'other land allocated for residential purposes' (B)
300
Residual delivery (A-B)
0 dwellings
Delivery Shortfall
300

TOTAL

Predicted Delivery (A)
1,562 dwellings

Allocations on 'other land allocated for residential purposes' (B)
1,125 dwellings

Residual delivery (A-B)
437 dwellings

Delivery Shortfall
1,125 dwellings

The above table confirms that the removal of the 'other land allocated for residential purposes' from the calculation of the Rochford five year housing land supply leaves the Council with a minimum net additional housing delivery of 437 dwellings, which equates to a supply of 1.7 years based on the adjusted annual delivery target of a minimum of 255 net additional dwellings per annum. As such, the Council is failing to meet its requirement to demonstrate a five year housing land supply in accordance with PPS3 and the supporting guidance provided by CLG. It is notable that the recent application by David Wilson Homes at Land between Main Road and Rectory Road and Clements Hall Way, Hawkwell identifies an even greater shortfall in the Council's five year housing land supply.

In addition to the above, the AMR does not include a commentary on how deliverability has been assessed against the requirements of paragraph 54 of PPS3.

Furthermore, the guidance from CLG confirms that the windfall sites cannot be relied upon in demonstrating a five year supply unless a Local Planning Authority can demonstrate genuine local circumstances exist to allow this exception. However, the second paragraph of the section entitled 'Housing Trajectory and Five Year Housing Supply' confirms that

Core Strategy Submission Document

O - 16250 - 9177 - Extension to residential envelopes post-2021, 4.28 - i

16250 Object

CHAPTER 4 Extension to residential envelopes post-2021, 4.28

the estimated completions in the years 2008 to 2013 includes estimated yields through 'intensification' coming forward in future years. With reference to the definition of 'intensification' on page 13 of the AMR, it appears that the 'Housing Trajectory and Five Year Housing Supply' also includes provision for windfall sites. As such, the Council is required to demonstrate the 'genuine local circumstances exist to allow this exception'.

The pressures on delivery and need for additional sites are more acute when it is considered that an average delivery rate of 204 dwellings per annum was achieved during a strong period of housing market growth. In view of the current economic downturn, and significant problems faced within the housing market, the Council should seek to identify appropriate and deliverable sites to meet its regional housing target provision commitments. Suitable sites would include Coombes Farm, which has been positively promoted for development through the LDF process.

It may, therefore, be more appropriate for the Council not merely to allocate sufficient sites to meet the minimum targets set down by the East of England Plan, but to identify a reservoir of land capable of coming forward for development should the sites identified through the CSS and Allocations Development Plan Documents (DPD) fail to come forward for development within the anticipated timescales.

Change to Plan

Appear at exam? Yes Soundness Tests i

Core Strategy Submission Document

O - 15916 - 9936 - Policy H3 - Extension to residential envelopes post-2021 - i, iii

15916 Object

CHAPTER 4 Policy H3 - Extension to residential envelopes post-2021

Respondent: Mr David Grew [9936]

PO Box 2091
Hockley
Essex
SS5 4WR
UK
07740201389

Agent: Mr David Grew [9936]

PO Box 2091
Hockley
Essex
SS5 4WR
UK
07740201389

Full Text: These locations are unsustainable with poor access to public transport and poor road links. Policy is unsound and not legally compliant in that it does not conform with RSS and national policies in respect of the siting of development in sustainable locations and reducing the need for private car use.

Summary: These locations are unsustainable with poor access to public transport and poor road links. Policy is unsound and not legally compliant in that it does not conform with RSS and national policies in respect of the siting of development in sustainable locations and reducing the need for private car use.

Change to Plan These areas should not be under consideration, when more sustainable locations exist.

Appear at exam? No

Soundness Tests i, iii

Core Strategy Submission Document

O - 16022 - 14146 - Policy H3 - Extension to residential envelopes post-2021 - i, ii, iii

16022 Object

CHAPTER 4 Policy H3 - Extension to residential envelopes post-2021

Respondent: Mr H Snell [14146]

Greensleeves
57 High Road
Hockley

SS5 4SZ

Agent: Capita Symonds (Mr David Spencer) [14145]

Capita Symonds
Elizabeth House
Walpole Loke
Dereham
Norfolk
NR19 1EE
England
01362656889

Full Text: Whilst the recognition to release green belt land is supported, the proposals to release significant quantities of development in second and third tier settlements below more sustainable settlements like Hockley are unsound. Furthermore the approach is contrary to the RSS policy framework and the provisions of sustainable locations for housing growth espoused in PPS1 and PPS3. The Council's own evidence and lack of strategic evidence on infrastructure and impact on European Habitats further undermines the effectiveness of Policy H3 as drafted to be the most sustainable option.

Summary: Whilst the recognition to release green belt land is supported, the proposals to release significant quantities of development in second and third tier settlements below more sustainable settlements like Hockley are unsound. Furthermore the approach is contrary to the RSS policy framework and the provisions of sustainable locations for housing growth espoused in PPS1 and PPS3. The Council's own evidence and lack of strategic evidence on infrastructure and impact on European Habitats further undermines the effectiveness of Policy H3 as drafted to be the most sustainable option.

Change to Plan The Council's evidence indicates that the release of land at east Ashingdon, south-west Hullbridge and Great Wakering have higher infrastructure costs. The inclusion of growth at Canewdon (a third tier settlement) is wholly unsustainable. Without access to the final SHLAA and viability assessments it is difficult to comment on the deliverability of these options. All locations have limited public transport and fewer services and facilities compared to Hockley and as such the approach is unsound. Policy H2 should be re-drafted to increase the allocation for Hockley at the expense of less sustainable tier two settlements. As currently drafted the LDF directs 59 % of green belt release housing development to top tier settlements and 41 % to second and third tier settlements. There is scant evidence to support the approach in Policy H2 other than the Council's Sustainability Appraisal Report which says it wants to support the rural communities and that greater growth in the towns will harm their character. The absence of a detailed Infrastructure Study and more critically a Habitats Regulation Assessment (given the proximity of growth locations to the Crouch Estuary SPA) at this late stage of the plan preparation process creates considerable uncertainty that the strategy as presented is deliverable and sufficiently flexible to meet the Vision and objectives. This can be resolved by removing or reducing the allocations from second and third tier settlements and re-directing that growth to sustainable locations such as Hockley. A significant advantage of Hockley is that is less proximate to European Habitats than locations such as Canewdon and Great Wakering.

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16087 - 14154 - Policy H3 - Extension to residential envelopes post-2021 - i, ii, iii

16087 Object

CHAPTER 4 Policy H3 - Extension to residential envelopes post-2021

Respondent: H R Philpot and Sons and Mr [14154]

H R Philpot and Sons and Mr
c/o Bidwells
Number One Legg St
Chelmsford
CM1 1JS

Agent: Bidwells (Mr Sam Metson) [14151]

Bidwells
Number One Legg Street
Chelmsford
Essex
CM1 1JS
01245 250998

Full Text: Policies H2 and H3 should deliver growth by extending existing settlements and Council's overall approach should be encouraged. However, fundamentally the detailed locations and quantum of development should be articulated within the Allocations DPD.

We cannot support the key diagram or the detailed descriptions for the locations of future development contained in policies H2 and H3 as the proposed extensions to residential envelopes pre and post 2021 are too site specific. It is considered that the Core Strategy should identify land at Hullbridge as a growth location and not specifically land South-West of Hullbridge.

Summary: Policies H2 and H3 should deliver growth by extending existing settlements and Council's overall approach should be encouraged. However, fundamentally the detailed locations and quantum of development should be articulated within the Allocations DPD.

We cannot support the key diagram or the detailed descriptions for the locations of future development contained in policies H2 and H3 as the proposed extensions to residential envelopes pre and post 2021 are too site specific. It is considered that the Core Strategy should identify land at Hullbridge as a growth location and not specifically land South-West of Hullbridge.

Change to Plan The Core Strategy should identify Hullbridge as a growth location and not specifically refer to 'land South-West of Hullbridge'. This is too site specific at this stage. It should be for the Site Allocations DPD to allocate land in particular locations based on the broad spatial strategy of the Core Strategy.

Appear at exam? Yes **Soundness Tests** i, ii, iii

Core Strategy Submission Document

S - 16109 - 14107 - Policy H3 - Extension to residential envelopes post-2021 - None

16109 Support

CHAPTER 4 Policy H3 - Extension to residential envelopes post-2021

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: We agree, but WITH THE EXCEPTION of the following:

It is felt that without additional infrastructure the allocation of the number of dwellings proposed for the settlement in the Rochford vicinity, it is disproportionately higher compared to that of other major settlements.

Summary: We agree, but WITH THE EXCEPTION of the following:

It is felt that without additional infrastructure the allocation of the number of dwellings proposed for the settlement in the Rochford vicinity, it is disproportionately higher compared to that of other major settlements.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16151 - 9823 - Policy H3 - Extension to residential envelopes post-2021 - i

16151 Object

CHAPTER 4 Policy H3 - Extension to residential envelopes post-2021

Respondent: mr alistir matthews [9823]

Agent: N/A

telfords farm
chelmsford road
battlesbridge
wickford
SS118TR
uk
01268732069

Full Text: Again land described as south west hullbridge is in fact largely in Rawreth .In the infrastructure requirements it states that Watery lane will be straightened .The road leads to Battlesbridge, a conservation area ,then onto a single carriage way road over a river bridge or via a substandard junction with the A1245.There is already considerable congestion between 7am and 9 am and again in the evening peak .

Summary: Again land described as south west hullbridge is in fact largely in Rawreth .In the infrastructure requirements it states that Watery lane will be straightened .The road leads to Battlesbridge, a conservation area ,then onto a single carriage way road over a river bridge or via a substandard junction with the A1245.There is already considerable congestion between 7am and 9 am and again in the evening peak .

Change to Plan Any development in Hullbridge will need better communication links than that envisaged by this document .There is a pressing need to source central government funds for a comprehensive overall transport plan .This document fails to address this by looking at each individual sites needs not the whole picture .

Appear at exam? No

Soundness Tests i

Core Strategy Submission Document

O - 16198 - 9917 - Policy H3 - Extension to residential envelopes post-2021 - i, iii

16198 Object

CHAPTER 4 Policy H3 - Extension to residential envelopes post-2021

Respondent: Inner London Group [9917]

Inner London Group
P.O. Box 91
Benfleet,
Essex
SS7 2FF

Agent: Christopher Wickham Associates (Mr C Wickham)
[4961]

Christopher Wickham Associates
35 High Street
Highgate
London
N6 5JT

Full Text: Development at West Great Wakering would be visually intrusive, and would not relate satisfactorily to the existing Green Belt boundary and other features. This would be contrary to the advice in PPG 2. Any extension of the residential envelope of Great Wakering should be to the south-west of the settlement. This would approach, which would limit the sprawl of the settlement, would relate successfully to the previously developed land at Star Lane, and would be visually contained by existing development boundaries to the west, north and east.

Summary: Development at West Great Wakering would be visually intrusive, and would not relate satisfactorily to the existing Green Belt boundary and other features. This would be contrary to the advice in PPG 2. Any extension of the residential envelope of Great Wakering should be to the south-west of the settlement. This would approach, which would limit the sprawl of the settlement, would relate successfully to the previously developed land at Star Lane, and would be visually contained by existing development boundaries to the west, north and east.

Change to Plan West Great Wakering should be removed as a location for the extension of the residential envelope, and should be replaced by south-west Great Wakering. This will be sound because it will better reflect the requirements of national Green Belt policy, and will have a more acceptable impact on the landscape.

Appear at exam? No

Soundness Tests i, iii

Core Strategy Submission Document

O - 16200 - 9891 - Policy H3 - Extension to residential envelopes post-2021 - i, iii

16200 Object

CHAPTER 4 Policy H3 - Extension to residential envelopes post-2021

Respondent: Stolkin and Clements (Southend) LLP [9891]

Stolkin and Clements (Southend) LLP
Hawkley House
28 Chapel Street
Billericay
CM12 9LU

Agent: Firstplan (Ms K Matthews) [8501]

Firstplan
25 Floral Street
London
WC2E 9DS
020 7031 8210

Full Text: The Core Strategy is unsound because Draft Policy H3 is neither justified nor consistent with National Policy.

Whilst our clients, Stolkin and Clements (Southend) LLP, agree that it is sound to designate green belt land for residential development, in order to have a 15 year housing land supply; the areas designated in Policies H2 and H3 are not the most appropriate areas and land at Tithe Park, should be designated within Draft Policy H2/H3 for c. 390 dwellings.

We have previously submitted a masterplan for Tithe Park during the preferred options consultation and this masterplan is provided again for information.

Consistency with National Policy

Draft Policy H3 is unsound because it is not consistent with the following National Policy:-

PPS1 provides the overarching Government planning advice for the delivery of sustainable development through the planning system.

Paragraph 13 sets out the key principles, which include:

(iii) "Development plans should ensure that sustainable development is pursued in an integrated manner, in line with the principles for sustainable development set out in the UK strategy. Regional planning bodies and local planning authorities should ensure that development plans promote outcomes in which environmental, economic and social objectives are achieved together over time.

(iv) Regional planning bodies and local planning authorities should ensure that development plans contribute to global sustainability by addressing the causes and potential impacts of climate change - through policies which reduce energy use, reduce emissions (for example, by encouraging patterns of development which reduce the need to travel by private car, or reduce the impact of moving freight), promote the development of renewable energy resources, and take climate change impacts into account in the location and design of development."

Paragraph 16 of PPS1 confirms that development plans should address accessibility (both in terms of location and physical access) for all members of the community to jobs, health, housing, education, shops, leisure and community facilities. Paragraph 27 (v) reiterates this, setting out that in preparing development plan documents, planning authorities should seek to ensure that everyone can access services or facilities on foot, bicycle or public transport rather than having to rely on access by car, whilst recognising that this may be more difficult in rural areas.

Paragraph 20 confirms that development plan policies should take into account the protection of the wider countryside and impact of the development on landscape quality.

PPS3 sets out the national planning policy framework for delivering the Government's housing objectives. Paragraph 36 states that the Government's policy is to ensure that housing is developed in suitable locations which offer a range of community facilities and with good access to jobs, key services and infrastructure

PPG13 sets out the Government's planning guidance on transport planning. Paragraph 4 sets out the following objectives:-

1. promote more sustainable transport choices for both people and for moving freight;
2. promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling, and
3. reduce the need to travel, especially by car.

In summary the Core Strategy is not consistent with the following two objectives of national policy:

- Minimising the need to travel
- Protecting the wider countryside and landscape quality

Minimising the need to travel

Core Strategy Submission Document

O - 16200 - 9891 - Policy H3 - Extension to residential envelopes post-2021 - i, iii

16200 Object

CHAPTER 4 Policy H3 - Extension to residential envelopes post-2021

The Core Strategy Submission Document recognises that a high proportion of the Rochford workforce commutes out of the District, with 30% travelling to work in Southend (Paragraph 2.53).

It states that:-

"the strength of the spheres of influence of the large neighbouring centres of Southend, Basildon and Chelmsford means that traffic is drawn through Rochford District's own centres to them. This not only has an impact on traffic congestion in general, but also engenders concern with regards to air quality within the District's town centres." (Paragraph 2.62)

Paragraph 6.5 of the Core Strategy states that the Council recognises that diverting development and population growth away from rural areas to existing urban areas can assist in achieving sustainability objectives.

Draft Policy H3 proposes various extensions to existing settlements, however, these extensions will inevitably lead to increased car use from a greater number of commuters.

A more sustainable option is to provide a residential extension to Southend on the Tithe Park site.

As detailed in the 'Tithe Park' masterplan (August 2008), the site is within 10 minutes walk of the shopping and associated amenities of the Asda superstore, the local shops situated on the Broadway, Southend, and individual local shops within Shoeburyness. It is within 10 minutes walk of a number of primary and secondary schools. Furthermore, the site is within comfortable cycling distance of Shoeburyness Railway Station with direct links to London Fenchurch Street as well as local stops within Southend including Southend Central Railway Station from where the town centre amenities can easily be accessed. There are also bus stops situated to the south of the site along Eagle Way.

Tithe Park is therefore better connected than some of the other locations set out in Draft Policy H3, for example, South West Hullbridge, which is not within comfortable cycling distance of a railway station. It will also have no harmful impact on the traffic congestion within Rochford Borough which, some of the other locations suggested in the Core Strategy will as they are likely to be home to commuters to Southend who will travel to Southend everyday by motor car.

Protecting the wider countryside and landscape quality

Draft Policy H3 proposes several extensions to existing settlements. Whilst, the Core Strategy does not allocate specific sites, it is important that the locations set out in Core Strategy Draft Policy H2/ H3 are able to provide sites which are well related to their settlement and do not impact on the surrounding landscape.

Tithe Park abuts the urban area of Southend to the south and west and therefore will have an acceptable impact in terms of the overall openness of the countryside.

Justification

Draft Policy H3 is not justified because it is not the most appropriate strategy when considered against reasonable alternatives, as required by paragraphs 4.36 - 4.38 of PPS12 (Justification of Core Strategies). In particular, the proposed location of housing, as an extension to the Southend urban area, is a more sustainable option and therefore a more appropriate strategy.

The Strategic Housing Land Availability Statement (SHLAA) had not been published at the time of the submission version consultation, only a summary table had been produced. It is therefore impossible to understand how Draft Policy H3 is underpinned by this key part of the evidence base and is therefore justified.

However, having considered the other documents, including the Strategic Environmental Assessment Baseline Information Profile 2008 - 2009, it is clear that Tithe Park should be considered sequentially preferable to the areas identified in Draft Policy H3. For example:-

• West Great Wakering is situated within the Crouch and Roach Farmland Landscape Area which has a higher landscape sensitivity than the Tithe Park site which is located within the South Essex Coastal Towns Landscape Area.
• Depending on the sites chosen, there is a possibility that land south west of Hullbridge will be in Flood Risk Zone 2 or 3

Given these findings it is clear that the proposed sites are not based on a robust and credible evidence base.

Summary:

The Core Strategy is unsound because draft Policy H2 is neither justified nor consistent with National Policy.

The areas designated in Policy H2 are not the most appropriate areas and land at Tithe Park, should be designated within Policy H2/H3 for c. 390 dwellings.

Additional evidence supplied, Council ref AE26

Change to Plan

Policy H3 to be amended to include our clients site as an 'Area' in the table. The area could be known as 'land to the south of Poynters Lane, adjoining the urban area of Southend.

Core Strategy Submission Document

O - 16200 - 9891 - Policy H3 - Extension to residential envelopes post-2021 - i, iii

16200 Object

CHAPTER 4 Policy H3 - Extension to residential envelopes post-2021

Appear at exam? Yes

Soundness Tests i, iii

Core Strategy Submission Document

O - 16216 - 8650 - Policy H3 - Extension to residential envelopes post-2021 - ii

16216 Object

CHAPTER 4 Policy H3 - Extension to residential envelopes post-2021

Respondent: Countryside Properties (Southern) Ltd (Mr Steve Price) [8650] **Agent:** N/A

Countryside Properties (Southern) Ltd
Countryside House
The Drive
Brentwood
Essex
CM13 3AT
01277260000

Full Text: Unsound (ii) not effective (not deliverable/not flexible)

It is noted that there are no numbers allocated for Rayleigh post 2021. Bearing in mind;

- (i) The sustainability and accessibility credentials for Rayleigh as opposed to other settlements within the district
- (ii) Our views that identified brownfield sites may not be able to be delivered
- (iii) The constraints associated with those sites identified in Policy H3
- (iv) That we consider that North of London Road, Rayleigh, can take more than the identified number of units

we would argue that further longer term growth should be planned for in Rayleigh, particularly at the most sustainable location for Rayleigh, land north of London Road, on top of the earlier allocations.

Summary: we would argue that further longer term growth should be planned for in Rayleigh, particularly at the most sustainable location for Rayleigh, land north of London Road, on top of the earlier allocations.

Change to Plan Further dwellings be identified for Rayleigh, particularly North of London Road Rayleigh, in this policy.

Appear at exam? Yes **Soundness Tests** ii

Core Strategy Submission Document

O - 16350 - 8267 - Policy H3 - Extension to residential envelopes post-2021 - ii

16350 Object

CHAPTER 4 Policy H3 - Extension to residential envelopes post-2021

Respondent: Aber Ltd [8267]

Aber Ltd
C/o Agent

Agent: Colliers CRE (Mr S Chapman) [8266]

Colliers CRE
9 Marylebone Lane
London
W1U 1HL
020 7344 6533

Full Text:

In addition, to the general location and development been articulated within the Allocations Development Plan Document, in accordance with the requirement of PPS3 the specific sites should also be delineated on the Proposals Map.

This approach is consistent with the need to maintain flexibility in order to ensure certainty to the delivery of the 15 year supply, particularly if any of the locations identified in the period post 2021 need to be brought forward in order to maintain the 5 year supply. This may require the release of land from the Green Belt ahead of the development of all the sites in Policy H2.

Amend first paragraph as follows:

Post-2021, the residential envelope of existing settlements will be extended in the following areas (as indicated on the Key Diagram) to deliver the following number of units post-2021. Prior to this time, Green Belt land within such areas will be safeguarded with the exception of land that is required to maintain a continuous 5 year supply of land in accordance with Policy H2.

Amend second paragraph as follows:

The detailed location and quantum of development will be articulated within the Allocations Development Plan Document, and delineated on the Proposals Map.

Summary:

In addition, to the general location and development been articulated within the Allocations Development Plan Document, in accordance with the requirement of PPS3 the specific sites should also be delineated on the Proposals Map.

This approach is consistent with the need to maintain flexibility in order to ensure certainty to the delivery of the 15 year supply, particularly if any of the locations identified in the period post 2021 need to be brought forward in order to maintain the 5 year supply. This may require the release of land from the Green Belt ahead of the development of all the sites in Policy H2.

Change to Plan

Amend first paragraph as follows:

Post-2021, the residential envelope of existing settlements will be extended in the following areas (as indicated on the Key Diagram) to deliver the following number of units post-2021. Prior to this time, Green Belt land within such areas will be safeguarded with the exception of land that is required to maintain a continuous 5 year supply of land in accordance with Policy H2.

Amend second paragraph as follows:

The detailed location and quantum of development will be articulated within the Allocations Development Plan Document, and delineated on the Proposals Map.

Appear at exam? No

Soundness Tests ii

Core Strategy Submission Document

O - 16459 - 7507 - Policy H3 - Extension to residential envelopes post-2021 - ii

16459 Object

CHAPTER 4 Policy H3 - Extension to residential envelopes post-2021

Respondent: Mr S Welsh [7507]

Hanover Land Trust
35 Castle Road
Rayleigh
Essex
SS6 7QD

Agent: N/A

Full Text: We consider the DPD is potentially unsound depending on the final selection of specific sites or site in South West Hullbridge.

Please see attached statements 1, 2, 3 and 4 evidential statement.

The precise wording should correlate to the proposal of the attached statements, although the issue may be resolved by publication of the allocations development plan document.

Oral participation will depend on whether the proposed site is included in the allocation development plan document for specific sites for future development, if the proposed site is included oral participation will not be required or necessary.

Summary: We consider the DPD is potentially unsound depending on the final selection of specific sites or site in South West Hullbridge.

Please see attached statements 1, 2, 3 and 4 evidential statement.

Change to Plan The precise wording should correlate to the proposal of the attached statements, although the issue may be resolved by publication of the allocations development plan document.

Appear at exam? Yes

Soundness Tests ii

Core Strategy Submission Document

O - 16475 - 7342 - Policy H3 - Extension to residential envelopes post-2021 - i

16475 Object

CHAPTER 4 Policy H3 - Extension to residential envelopes post-2021

Respondent: Rawreth Parish Council (Mrs H Bloomfield) [7342] **Agent:** N/A

Rawreth Parish Council
103 Downhall Park
Way Rayleigh
Essex
SS6 9QZ
01268 631821

Full Text:

LDF - Preferred Options - Rayleigh conurbation.

On behalf of Rawreth Parish Council I confirm that this letter is a formal response of objection to the final draft of Rochford District Councils Core Strategy Preferred Options document.

Firstly, at no time has the Parish of Rawreth been included or mentioned in any "Tier" on page 33 of the document, the criteria for allocation of houses - within the Core Strategy. If it had been included it should have been in Tier 4 and this is, therefore, UNSOUND.

The Parish Council believes that to develop 550 houses in one place within area no: 144, land to the north of London Road and then to add a further 220 to the Rawreth Industrial Estate area will totally destroy the character and rural outlook of Rawreth and surrounding areas. It will destroy the residents' "strong sense of identity within their own settlement" and is, therefore, UNSOUND.

The huge development of 550 houses is totally unacceptable. The land north of London Road is good quality agricultural land which is protected by the Green Belt -GB1 - fulfils all purposes under PPG2 and should be retained as such. Once used for development this land can never be returned to agricultural use, and if you continue to erode into our Green Belt and farmland it will be lost forever.

The Parish Council believe a proportion of the houses required to be built in our area should compliment and enhance Rawreth, cause as little extra congestion to our already heavily overcrowded roads as possible and provide a pleasant environment for those people wishing to move to the area. This particular area is part of the "Gateway to Rochford" and is the "strategic buffer" between Rayleigh and Wickford. Reference is made in the Core Strategy document to "avoiding coalescence" of villages/towns, however a development of this size immediately erodes the buffer between Rayleigh, Rawreth and Wickford, starts coalescence, destroys the rural character of Rawreth and, therefore, is UNSOUND.

The Core Strategy Document details Rochford District Councils priorities and objectives and details how the role of the Core Strategy features in achieving these. In support of the Parish Councils observations and alternative proposals they comment as follows.

Page 5 "Fostering greater community cohesion"

Development of land between Rawreth Lane and north of London Road will not give any community cohesion at all, it will simply be an extension to the west of Rayleigh giving residents no real sense of belonging, they will live within the Parish of Rawreth, yet they will be considered as living in Rayleigh as has been proved with other developments along Rawreth Lane such as Laburnum Way.

Page 12 "Priority 5 Essex roads are safer less congested and everyone has access to essential services"

The roads and infrastructure in the Rawreth area are completely full to capacity. The A127, A1245, A129 London Road, Rawreth Lane and Watery Lane just cannot take any more traffic and the proposed development on land to the north of London Road will increase traffic to a completely unsustainable level. On numerous occasions this year incidents within and on the outskirts of the Parish have brought traffic to a standstill for hours along London Road, Rawreth Lane, Watery Lane/Beeches Road and the Hullbridge Road. It took some residents 1 ¼ hours to proceed along Rawreth Lane and into Hullbridge - a distance of 1 1/2 miles.

The proposed development at the western edge of Hullbridge, which is, in fact, largely in Rawreth would also greatly increase the traffic problems in the area. Rawreth Parish Council understand there would be a proposal to "widen/straighten" Watery Lane/Beeches Road, with a roundabout at the junction with the Hullbridge Road. This is an extremely dangerous junction even at the present time and would become increasingly so. There is also the question of where the traffic would go when it reaches Battlesbridge at the Western end, it cannot possibly cross the Bridge as this is "restricted" and in a Conservation Area, therefore, it would have to turn left and proceed to the A1245 - a very dangerous junction.

Beeches Road/Watery Lane is also shown in the document as a new cyclist route. Surely this is a conflict of interest, a road widening/straightening proposal coupled with a cycle route.

Page 33 "Tier Settlements"

Nowhere in the Core Strategy Document is Rawreth Parish actually mentioned, it features in the "all other settlements tier 4" and is referred to as "land north of London Road Rayleigh" or "West Rayleigh" yet, the housing allocation of 550 dwellings between 2015 and 2021 and the 220 planned for the Rawreth Industrial Estate is the largest that any area is taking. Rawreth Parish currently has 380 dwellings and an electorate of 812, yet the proposed housing figures are set to increase the overall number of dwellings in the Parish by 203%.

Pages 34 to 36 "The efficient use of land for housing" and "Extensions to residential envelopes and phasing"

The Core Strategy Document states that "the Council recognises the importance of making best use of brownfield land" and "whilst the Council acknowledge that the housing requirement stipulated in the East of England Plan is a minimum, it must also be mindful of the need to maintain Green Belt as far as possible" yet the proposed 550 houses on the land

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16475 Object

CHAPTER 4 Policy H3 - Extension to residential envelopes post-2021

north of London Road will all be built on Green Belt land of high agricultural value. The document states that "the Council will direct development to the most sustainable locations on the edge of settlements having regard to:"

"The potential to avoid areas of constraint (such as areas at risk of flooding, sites of ecological importance"

"The historical, agricultural and ecological value of land"

"The potential to create a defensible Green Belt Boundary and

"The avoidance of coalescence with neighbouring settlements"

Yet these key factors all seem to have been ignored when choosing the site to the north of London Road and, therefore, the proposal is UNSOUND. The Parish of Rawreth has a history of flooding, the land in Rawreth Lane will drain into the already overloaded brook system and the Services in the area would be unable to cope with this increase in housing - drains and sewers are already working to capacity. Heavy rain earlier in the year resulted in flooding in Watery Lane and the Rawreth Brook system has been very close to flooding twice already this year. During a meeting between the Parish Council and the Environment Agency we were advised that this situation will worsen with increased housing.

Page 42 "Gypsy and Traveller Accommodation"

This section details the need for an allocation of 15 pitches by 2011, it also states that they "will examine the potential of current unauthorised sites to meet this need" and that "sites will be allocated in the west of the District" The west of the District is in fact Rawreth, but yet again the Parish name has not been detailed. The Parish already has an unauthorised site which is the subject of an enforcement case and although well kept is on the brow of a hill on a main highway with restricted access which Essex County Council have already raised concerns about, this is not a site that should be considered as part of the requirement due to its location, but also, why is the allocation of all 15 pitches being detailed to one area?

Page 43 to 44 "Appendix 1"

Details of all the infrastructure to accompany residential development is listed, yet there are no detailed costs, have these been done? And are these achievable? Large numbers of housing in one area, as stated in the infrastructure requirements, will necessitate a new primary school. County figures suggest that there will be surplus places in Rayleigh schools even with new housing. Obviously these will be in the wrong parts of the town so increasing the risk that an existing school could close. It makes sense to spread the development in smaller sites around the town, avoiding closure and preventing unnecessary provision of a new school.

Page 57 "Strategies, Activities and Actions - The Green Belt"

The document states that "The Council will continue to support the principals of restricting development in the Green Belt, as set out in PPG2 and will preserve the character and openness of the Green Belt" it further states that "a small proportion of the District's Green Belt will have to have its designation reviewed to allow development" The entire development of 550 houses planned for land north of London Road is all on Green Belt land as is the land at Hullbridge, how does this equate to a "small proportion"?

The Councils own Policy GB1- Green Belt Protection states "The Council will allocate the minimum amount of Green Belt land necessary to meet the District's housing and employment needs" and that they will "direct development away from the Green Belt as far as is practicable and will prioritise the protection of the Green Belt land based on how well the land helps achieve the purposes of the Green Belt".

This area of land confirms all 5 purposes of the national PPG2 - Green Belt:-

It prevents the unrestricted sprawl of western Rayleigh

It provides a barrier to prevent the ultimate merging of Rayleigh, Rawreth and Wickford

It assists in safeguarding the countryside from encroachment

It preserves the setting and special character of historic towns

Assists in urban regeneration, by encouraging the recycling of derelict and other urban land

Rawreth Parish Council have observed that there are a number of sites that were put forward in the "Call for Sites" that are pre-used brownfield land in the Green Belt land, and as such would prove beneficial and in their opinion should have been considered for development. Their non-inclusion as "brownfield" sites makes the current proposals

UNSOUND:

Site No; 73 Hambro Nursery a site of approximately 3.93 hectares, coupled with the adjacent site Clovelly, would provide between 200 and 250 houses in an area of approximately 4.85 hectares this area would have good access directly from the A1245 and if expanded north westward to include land up to and around the Village Hall, approximately another 2.08 hectares could produce between 50 and 80 further houses. This area could be accessed either from the slip road (Chelmsford Road) to the south of the Nevendon Garage or from Church Road.

Both of these sites would remove the need for extra traffic along the A129 and Rawreth Lane which are both already operating well over maximum capacity. This development would require a footbridge for pedestrians, cyclists and horses over the A1245.

Rawreth Parish Council believe these proposals would be sensible infill of these areas and would be on "Brownfield" sites where current businesses are not particularly progressive and would not result in the loss of many jobs. Our figures are quite conservative and we believe that if these sites were chosen a much reduced number of houses would need to be built "North of London Road" on Green Belt land.

Phase 2 - With regard to the houses that are proposed for the Northeast corner of Rawreth/Hullbridge, the Parish Council are concerned that any development would cause considerable extra congestion to the immediate roads. We understand that the thoughts are to "straighten" and improve parts of Watery Lane and Beeches Road to provide access to and through Battlesbridge - a conservation area. Recent experience of deep flooding in Watery Lane with the road closed for several days on 3 occasions in the early part of 2009 proves that this proposal is completely unsustainable. The local drainage systems simply cannot take the amount of run-off experienced now and with further development this

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O - 16475 - 7342 - Policy H3 - Extension to residential envelopes post-2021 - i

16475 Object

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would increase the problem.

If this development is to go ahead, the Parish Council believe that a relief road should be built, from the end of Watery Lane, skirting to the west of the Rayleigh Park Estate, crossing Rawreth Lane at a mini-roundabout and entering a vastly improved A129 at approximately Lower Barn Farm. This would take any necessary traffic in and out of the area efficiently.

The Parish Council further believe that the Michelins Farm site No: 49 would be an ideal site for the Rawreth Industrial Estate. This would adjoin proposed industrial sites within the Basildon District and would provide excellent road and transport links. Rawreth Parish Council also proposed that the land opposite Michelins Farm could be used to re-site the illegal Gypsy/Traveller site that is currently situated on the busy A1245. The land opposite Michelins Farm would not only be a much safer site for Gypsy/Traveller pitches, but the correct use of the land would also ensure the environmental improvement of the site as a whole.

All of the above proposals were submitted to Rochford District Council, but they were not taken into consideration in the final draft resulting in the predominant use of Green Belt land for development, bounded by already congested roads and, therefore, the proposals are UNSOUND.

Summary:

Phase 2 - With regard to the houses that are proposed for the Northeast corner of Rawreth/Hullbridge, the Parish Council are concerned that any development would cause considerable extra congestion to the immediate roads. We understand that the thoughts are to "straighten" and improve parts of Watery Lane and Beeches Road to provide access to and through Battlesbridge - a conservation area. Recent experience of deep flooding in Watery Lane with the road closed for several days on 3 occasions in the early part of 2009 proves that this proposal is completely unsustainable. The local drainage systems simply cannot take the amount of run-off experienced now and with further development this would increase the problem.

If this development is to go ahead, the Parish Council believe that a relief road should be built, from the end of Watery Lane, skirting to the west of the Rayleigh Park Estate, crossing Rawreth Lane at a mini-roundabout and entering a vastly improved A129 at approximately Lower Barn Farm. This would take any necessary traffic in and out of the area efficiently.

Change to Plan

The Parish Council further believe that the Michelins Farm site No: 49 would be an ideal site for the Rawreth Industrial Estate. This would adjoin proposed industrial sites within the Basildon District and would provide excellent road and transport links. Rawreth Parish Council also proposed that the land opposite Michelins Farm could be used to re-site the illegal Gypsy/Traveller site that is currently situated on the busy A1245. The land opposite Michelins Farm would not only be a much safer site for Gypsy/Traveller pitches, but the correct use of the land would also ensure the environmental improvement of the site as a whole.

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16567 - 9932 - Policy H3 - Extension to residential envelopes post-2021 - i, iii

16567 Object

CHAPTER 4 Policy H3 - Extension to residential envelopes post-2021

Respondent: Chelmsford Diocesan Board of Finance [9932]

Chelmsford Diocesan Board of Finance
C/O Agent

C/O Agent

Agent: Strutt & Parker (Mr David Williams) [9904]

Strutt & Parker
Strutt and Parker LLP
Coval Hall
Rainsford Road
Chelmsford
CM1 2QF
United Kingdom

Full Text: Please see section 2-3 of accompanying statement - Council ref AE31

Summary:

In the Regulation 25 iteration of the Core Strategy Document, Policy H3 set out the General Housing Locations Post 2021 Preferred Option. This included a further 90 units directed towards South Canewdon, in addition to the 60 units by 2015, which have now been provisionally phased between 2012 and 2021.

It appears that the 90 units directed to South Canewdon after 2021 have at this stage have been redirected to other areas, although there is no explanation for this within the Core Strategy Document itself or any rationale available within the background documentation for the decision to do this.

Geographically speaking, Canewdon is one of only two significantly sized settlements in the east of the district. It is important that the sustainability of the settlement is maintained. Suitable development with the appropriate mix of housing would be enabled by an increased phased allocation as was preferred in the previous iteration of the Core Strategy document.

Under the Government's Strategic Housing Policy Objectives set out in PPS3, Paragraph 9, the aim to create sustainable, inclusive and mixed communities in all areas both urban and rural is emphasised. A larger allocation after 2021 will increase the provision of a mix of housing, consequently improving the long term sustainability and viability of the settlement, which is located in one of the more rural areas of the District.

This revised strategy for phasing would increase the potential for the Core Strategy Objectives and Sustainable Community Strategy (SCS) Priorities to be met, as shown by the following:

- the objective to reduce inequalities of service provision (CS) by locating houses in a sustainable location close to existing services;
- to foster greater Community Cohesion (SCS) by providing community facilities such as public open space that includes play space; and
- to address the causes of climate change (CS) by providing housing in locations that are well served by sustainable means of transport.

Due to the changes made in the housing distribution post 2021 in the district since the Regulation 25 consultation document, the Submission document fails the test of soundness for policy H3 in terms of not being justified by a robust evidence base.

In addition, the policy is not considered to be the most appropriate strategy when considered against reasonable alternatives of allocating sufficient housing to the east of the District in order to support the provision of an appropriate volume and mix of types and tenures of housing in all areas urban and rural. Policy H3 is for this reason, also considered to be unsound through non-conformity with national planning policy under PPS3 which aims to enable the above mixed distribution of housing.

Change to Plan

The change required to the DPD to make Policy H3 sound is to review the need for an increased allocation, extending Canewdon after 2021, in addition to the proposed allocation between 2015 and 2012.

Appear at exam? No

Soundness Tests i, iii

Core Strategy Submission Document

O - 16613 - 5219 - Policy H3 - Extension to residential envelopes post-2021 - i, ii

16613 Object

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Respondent: Fairview New Homes Ltd [5219]

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020 83661271

Agent: Planning Potential (Miss G Brickwood) [7549]

Planning Potential
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London
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Full Text: Representations on behalf of Fairview New Homes

1. We are instructed by our client, Fairview New Homes, to submit comments on the published Core Strategy Submission Document. For ease specific reference has been made in accordance with the paragraph and policy numbers as contained in the published document. We would like the opportunity to represent our Client at the forthcoming Examination of the Core Strategy DPD and would be grateful for confirmation that this is possible.

2. Fairview New Homes have an interest in a parcel of land to the South West of Rayleigh Town Centre, as indicated on the attached site location plan. This land was previously identified in the Core Strategy Preferred Options documents to provide an urban extension to the south west of Rayleigh. This option has now been withdrawn in the Core Strategy Submission document and it is on this basis these representations are provided to the Council.

3. The Submission Core Strategy has been considered against the requirements set out at Paragraph 4.36 of PPS12 requiring core strategies to be justifiable and effective in order to be found sound, as follows:

Justified:

- i. Founded on a robust and credible evidence base
- ii. The most appropriate strategy when considered against the reasonable alternatives

Effective:

- i. Deliverable - the Core Strategy should show how the vision, objectives and strategy for the area will be delivered and by whom, and when, including who is responsible for implementing different elements of the strategy and when
- ii. Flexible - a strategy is unlikely to be effective if it cannot deal with changing circumstances. Plans should show how they will handle contingencies.
- iii. Able to be monitored - monitoring is essential for an effective strategy and will provide the basis on which the contingency plans within the strategy would be triggered.

4. To summarise our comments, Fairview New Homes strongly object to the Core Strategy as is currently presented on the basis the document is currently unsound for a number of reasons:

â€¢ The lack of robust and credible evidence base

â€¢ Failure to clearly discount reasonable alternatives

â€¢ The effectiveness of the plan is also considered to be flawed and the Council's approach to deliverability and flexibility is questioned.

5. Fundamentally, we question the soundness of the Core Strategy due to the lack of available evidence to support the choices made by the Council. In particular, there is a strong reliance on the findings of the 2009 Strategic Housing Land Availability Assessment (SHLAA) although it is understood this document is not due to be published for consideration alongside the Core Strategy. We, therefore, reserve the right to submit additional comments to the Core Strategy consultation following the publication of the SHLAA.

6. The 2009 SHLAA is clearly listed at Paragraph 1.29 of the submission Core Strategy as one of the evidence base documents the Council have drawn upon when drafting the Core Strategy. The documents listed are all considered to have played an important role in informing the Core Strategy. PPS12 also recognises at Paragraph 4.37 the importance of demonstrating how choices made in the plan are backed up by factual evidence identified in evidence base documents.

7. As a starting point it is important to state it is Fairview New Homes greatest concern there is no background provided within the Core Strategy document, or indeed any of the available evidence base documents, identifying why the Local Planning Authority has chosen to remove some of the sites previously proposed for housing development. In addition, there is also no justification as to why the retained urban extension sites are more suitable than those removed from the draft plan.

8. The following provides specific comments in response to the relevant areas of the Core Strategy.

Housing

9. It is stated at Paragraphs 4.10-4.12 that the Council have adopted a balanced approach when locating new housing between higher tier settlements and lower tier settlements. Although there is no detail provided as to how the Council

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O - 16613 - 5219 - Policy H3 - Extension to residential envelopes post-2021 - i, ii

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intend on implementing this balanced approach or how the strategic allocation of housing contributes to the balance required. Our Client cannot support this approach until further detail is understood as to the proportion of housing being allocated to each settlement tier.

10. The proposed distribution of housing development during the plan period does not appear to be proportionately allocated between the various settlement tiers. We would argue that development should be distributed proportionately in line with the size of the settlement in order to benefit for available services and facilities. Rayleigh recognised as having best access to services within the district at Paragraph 2.68 of the Core Strategy. On this basis it is considered the development should primarily be directed to Rayleigh with a proportionate level of housing to the remaining settlements in the District.

Policy H1 - The efficient use of land for housing

11. In general the use of residential extensions to meet the remaining housing requirement that cannot be delivered through the redevelopment of appropriate previously developed land is supported by Fairview New Homes.

12. It is understood there is a need to prioritise use of brownfield land in line with national policy requirements but this needs to be a carefully balanced and realistic approach in identifying appropriate urban extensions to accommodate the majority of the District's housing, as identified in the table at Paragraph 4.6 and later at Paragraph 4.15.

13. Policy H1 sets out that the Council will seek the redevelopment of Rawreth Lane Industrial Estate, Foundry Industrial Estate, Stambridge Mills and Star Lane Industrial Estate. Without sight of the 2009 SHLAA it is not possible to understand whether the Council's choice to release employment land for housing is appropriate and Fairview New Homes cannot, therefore, support this element of Policy H1. This objection is further amplified by the fact additional employment land is required but is yet to be identified.

Policy H2 - Extensions to residential envelopes and phasing

14. The Council's intention to provide a balanced strategy for housing provision is mentioned again at Paragraph 4.18. The comments made at Paragraphs 9 and 10 above are also relevant in this respect.

15. In comparing the Preferred Options Core Strategy Document and Submission Core Strategy Document there is a significant reduction in the number of housing units being provided in urban extensions pre 2015, from 1450 dwellings to 775. From discussions with the Local Planning Authority it is understood the Council are seeking to provide the District's housing requirements by increased development densities. From the evidence available in the Submission Core Strategy and summary of SHLAA sites a number of the sites identified as urban extensions have in fact been allocated a reduced number of dwellings, including the land to the north of London Road, Rayleigh. We would, therefore, consider the approach taken by the Local Planning Authority to provide the required level of housing is untenable and unjustified.

16. In discounting preferred options PPS12 makes clear at Paragraph 4.38 the requirement for Local Planning Authorities to consider and evaluate reasonable alternatives. As set out above, the choices the Council have pursued have not been substantiated and without the consideration of reasonable alternatives the Core Strategy cannot be considered justified and therefore unsound.

17. However, this is our opinion based only on discussions with the Local Planning Authority rather than a thorough evidence base and we will consider the evidence in detail when it become available and provide further comment.

18. Paragraph 4.19 of the draft Core Strategy details the Council's primary factors in determining the location of future urban extensions. It is presumed the Council have assessed each of the proposed urban extension sites against the following criteria and that this information is contained within the SHLAA, although we have not been provided with any evidence of this to assess. It can be demonstrated that the land identified on the attached site location plan meets all of the requirements set out below.

â€¢ The proximity and relationship to existing centres, facilities, services

â€¢ The availability of infrastructure and/or the potential for additional infrastructure to be provided for development in such areas

â€¢ The potential to reduce private car dependency

â€¢ The potential to avoid areas of constraint (such as areas at risk of flooding, sites of ecological importance, public safety zone etc)

â€¢ The historical, agricultural and ecological value of land

â€¢ The impact on highway network (including availability and impact on existing network, as well as potential for improvements to be delivered)

â€¢ The relationship of development locations to the District's area of employment growth

â€¢ The potential to create a defensible Green Belt boundary

â€¢ The avoidance of coalescence with neighbouring settlements

19. In summary, Fairview's land is sustainably located in particularly close proximity to Rayleigh Town Centre and train station. In addition, the location of the land provides a natural extension and rounding of settlement boundary. An extension to Rayleigh in this location offers no opportunity for coalescence with neighbouring settlements nor does it constitute urban sprawl.

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16613 Object

CHAPTER 4 Policy H3 - Extension to residential envelopes post-2021

Policy H2 - Extensions to residential envelopes and phasing

20. Although it is stated a flexible approach to the timings of the release of land will be maintain no explanation is provided as to why some sites are considered suitable for development pre 2015 and others post 2015. Paragraph 4.22 elaborates further to state a number of factors have been considered when determining the phasing of strategic housing sites although this information is not clearly available to assess.

21. As stated above the principle of releasing certain areas of greenbelt land is considered the best approach to meeting the Council's housing provision requirements. However, Fairview New Homes object to the omission of the land to the South West of Rayleigh for housing development as previously identified in the Core Strategy Preferred Options document. The site identified on the attached site location plan has been assessed against the Council's criteria, as set out at Paragraph 18 above and each requirement can be met. Without any clear explanation as to why this site has been discounted and the only other strategic housing site identified in Rayleigh is located further away from Rayleigh Town Centre and the associated services and facilities including the train station, Fairview New Homes object to Policy H2.

22. As considered at the outset of these representations the draft Core Strategy cannot be considered robust, and therefore sound, without clear justification and evidence base.

Policy H3 - Extension to residential envelopes post-2021

23. Policy H3 is supported on the basis that the release of greenbelt land is required for housing and this is the most appropriate approach to meet the Council's housing requirements, as set out at Paragraph 21 above.

24. However, it is unclear why some of the sites previously identified for housing development pre 2015 up until 2021 in the Preferred Options Core Strategy document have now been allocated for development post 2021, such as South East Ashingdon. It is stated at Paragraph 4.24 of the Submission Core Strategy document those areas identified for post 2021 development may not be immediately deliverable. However, there is no information available to understand why these sites are now no longer considered suitable for pre 2015 development as they were in December 2008. As a result, Fairview New Homes consider Policy H3 to be unjustified and therefore unsound.

Affordable Housing

25. The acute need for additional affordable housing is recognised at Paragraph 4.30. It is unclear from the draft Core Strategy document exactly how much affordable housing is required in the District in the plan period.

26. However, taking the starting point as set out at Paragraph 4.30 that the Thames Gateway South Essex Strategic Housing Market Assessment requires 131 net additional affordable dwellings per year which constitutes 52% of the District's overall annual housing target. In order to achieve this target using the Council's proposed policy requirement that new housing developments are to provide 35% affordable housing, 375 new dwellings would need to be developed each year. This calculation does not account for those developments with fewer than 15 dwellings which have no requirement to provide affordable housing or developments which cannot viably afford to provide non-market housing.

27. An annual requirement of 250 dwellings is identified at Paragraph 4.2 of the Core Strategy which would leave a significant short fall of affordable housing and act to compound the current situation. The approach taken by the Council ultimately accepts there will always be a shortfall in affordable housing provision and does not seek to redress this. We do not, therefore, consider this to be a robust or justified approach to achieving affordable housing in the District.

28. It is, therefore, considered in order to meet the District's affordable housing requirement additional housing land should be identified in order to ensure a wholesale increase in housing provision to address the Council's shortfall in affordable housing and meet the targets set for the plan period. The most appropriate and effective method by which to secure affordable housing provision is through developing large sites that are viably able to offer affordable housing units.

29. During the consultation of the submission Core Strategy the Council's Housing Strategy (2009) was not available and we reserve the right to make further comment on this document following the publication of this evidence.

The Green Belt

30. It is fully accepted by the Council that the Green Belt boundary is currently too tightly drawn and the release of some Green Belt land is necessary to meet the District's development requirements. However, it needs to be demonstrated that the areas of Green Belt land to be lost are justified and located in the most appropriate area and that areas of release land do not undermine the principle of the Green Belt.

31. It is understood from Paragraph 6.7 of the Submission Core Strategy the Council will seek to examine the degree to which current Green Belt land is helping to achieve the purposes of the Green Belt when considering reallocating land. However, areas of Green Belt are proposed to be reallocated for urban extensions prior to this research being undertaken.

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O - 16613 - 5219 - Policy H3 - Extension to residential envelopes post-2021 - i, ii

16613 Object

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32. Fairview New Homes fully support the justified retention of the areas of Green Belt where appropriate and the release of Green Belt land where needed. However, at present the proposed Housing policies and Green Belt policies are not coherent and the reallocation of certain areas of Green Belt is not based on a credible evidence base.

Environmental Issues

Policy ENV4 - Sustainable Drainage Systems (SUDS)

33. Fairview New Homes would like to support the flexibility contained within Policy ENV4 which recognises it is not always viably possible to incorporate SUDS in all developments.

Policy ENV8 - On Site Renewable and Low Carbon Energy Generation

34. We would also like to support Policy ENV8 on the same basis as Policy ENV4 in that it is important that the production of energy from renewable or low carbon sources is only required where it is viably possible so as not to resulting in developments not coming forward.

Transport

Policy T8 - Parking Standards

35. Fairview New Homes object to Policy T8 as it is currently contrary to National Policy requirements as set out in PPG13 which contains maximum parking standards. Indeed, this is recognised at Paragraph 10.27 of the Submission Core Strategy document. Enforcing minimum parking standards is not consistent with local or national sustainability aims and should not be an approach pursued by the Council.

Summary:

Policy H3 - Extension to residential envelopes post-2021

23. Policy H3 is supported on the basis that the release of greenbelt land is required for housing and this is the most appropriate approach to meet the Council's housing requirements, as set out at Paragraph 21 above.

24. However, it is unclear why some of the sites previously identified for housing development pre 2015 up until 2021 in the Preferred Options Core Strategy document have now been allocated for development post 2021, such as South East Ashingdon. It is stated at Paragraph 4.24 of the Submission Core Strategy document those areas identified for post 2021 development may not be immediately deliverable. However, there is no information available to understand why these sites are now no longer considered suitable for pre 2015 development as they were in December 2008. As a result, Fairview New Homes consider Policy H3 to be unjustified and therefore unsound.

Change to Plan

Appear at exam? Yes

Soundness Tests i, ii

Core Strategy Submission Document

O - 16685 - 8069 - Policy H3 - Extension to residential envelopes post-2021 - i, ii, iii

16685 Object

CHAPTER 4 Policy H3 - Extension to residential envelopes post-2021

Respondent: A W Squier LTD and the Croll Group [8069]

A W Squier LTD and the Croll Group
Doggetts
Rochford

SS4 3RN

Agent: Andrew Martin Associates Ltd (Mr R Pomery) [7786]

Andrew Martin Associates Ltd
Croxtan's Mill
Little Waltham
Chelmsford
Essex

CM3 3PJ

01245 361611

Full Text:

Policy H3 - Extension to residential envelopes and phasing

Summary: The Respondent finds the document to be unsound in its present form, however were the amendments set out in these representations to be incorporated then it is considered that the document will be sound. Although the inclusion of land at South-East Ashingdon is supported, there is no need for this policy or its table. There is no evidence or reasoning for holding back these sites until the latter years of the plan period.

Full text: This policy is unnecessary; there is no obvious justification for holding back these units to the latter years of the plan. The Council will be left with no flexibility, if the delivery identified in the first two phases does not materialise or if it exceeds current expectations. It is commonplace in other Core Strategies that have been adopted to allow a 10% contingency. Rochford has allocated its RSS minimum requirement and allows no flexibility to adjust if the need arose. The housing numbers (currently contained in Policy H2 and Policy H3) can be placed in one policy and in a single table. The Council may prefer to see some locations developed ahead of others and if so, there can be policies and reasoned justification set out in the Strategy to explain why this is necessary. There does not appear to be any identified infrastructure requirements, which will affect the release of numerous sites and as such no reason to set 5 yearly tranches for the release of land.

There is an absence of explanation in the Strategy or in the evidence base that points to the reasons why specific locations have been held back to post 2021. If the Council is to maintain a three tiered release of land then it must explain in its evidence base, why certain sites appear in certain phases. It is surprising that the phasing does not closely align itself with the settlement hierarchy explained on page 40. For example, the allocations for South-East Ashingdon, which lies in the first tier, is identified for development post-2021. There is no explanation for this or any obvious logic as to why the allocation is held back in this way. Development in this stop-start fashion is uneconomical and causes prolonged upheaval, which may present developers with delivery difficulties and delay the provision of community infrastructure.

As identified in the response to Policy H2, the Core Strategy only needs to have a single table which identifies the broad locations and provides an estimate of the amount of units that are likely to be delivered in each of those locations.

The emphasis in the Core Strategy should be shifted towards the flexible delivery of the maximum amount of housing in the most sustainable locations. It should not be about prescriptive delivery of the minimum amount of housing required in what appear to be arbitrary phases.

Proposed Amendment to Policy H3: This policy is neither justified nor effective and should therefore be deleted and the sites identified within it should be set out in an updated version of Policy H2.

Masterplan/Facilities plan Council ref AE22

Summary:

Summary: The Respondent finds the document to be unsound in its present form, however were the amendments set out in these representations to be incorporated then it is considered that the document will be sound. Although the inclusion of land at South-East Ashingdon is supported, there is no need for this policy or its table. There is no evidence or reasoning for holding back these sites until the latter years of the plan period.

Masterplan/Facilities plan Council ref AE22

Change to Plan

Proposed Amendment to Policy H3: This policy is neither justified nor effective and should therefore be deleted and the sites identified within it should be set out in an updated version of Policy H2.

Appear at exam? Yes

Soundness Tests i, ii, iii

Core Strategy Submission Document

S - 16688 - 9072 - Policy H3 - Extension to residential envelopes post-2021 - None

16688 Support

CHAPTER 4 Policy H3 - Extension to residential envelopes post-2021

Respondent: Essex County Council (Mr Roy Lewis) [9072] **Agent:** N/A

Essex County Council
ESH - Spatial Planning
Planning and Transport
County Hall
Chelmsford
CM1 4JU
01245-437578

Full Text: ROCHFORD CORE STRATEGY SUBMISSION DOCUMENT, SEPTEMBER 2009
RESPONSE OF ESSEX COUNTY COUNCIL

1. General Comment

Essex County Council welcomes and broadly supports the Core Strategy prepared by Rochford District Council. The Strategy contains policies and proposals that address the spatial characteristics, issues and opportunities facing the District whilst respecting the distinctive qualities of the different settlements and parts of the District.

The County Council fully supports the maintenance of a strong policy approach to protection of the Green Belt and of the quality of environmental assets in the District whilst making adequate housing and employment provision within the District. The Core Strategy presents an approach that emphasises a balance of opportunity through the District and recognition of emerging economic prospects in the District and neighbouring areas. The intended preparation of more detailed Action Area Plans for London Southend Airport and its environs and for each of the three town centres of Rayleigh, Rochford and Hockley will further enhance the approach of the Core Strategy. The emphasis on the three town centres is particularly welcomed as offering a stimulus to improvement in the services and facilities available locally within the District whilst also affording possibilities of increased community focus.

2. Housing Distribution and Locations

The East of England Plan requires Rochford to provide a minimum of 3,790 additional dwellings between 2006 and 2021. In addition, provision for a further 1,000 dwellings should be made between 2021 and 2025 to ensure delivery of housing for at least 15 years from adoption of the Core Strategy (expected in 2010). Of this total requirement the District Council has identified a capacity of 2,000 dwellings through a Strategic Housing Land Availability Assessment. This means that the Core Strategy has to identify locations for about 1,750 dwellings to be delivered before 2021 and a further 1,000 dwellings between 2021 and 2025.

Policy H1 (The efficient use of land for housing) is supported. However, prioritisation of the reuse of previously developed land within settlements for additional housing is unlikely to provide a sufficient source of provision due to the generally residential nature of existing settlements in the district and the absence of potentially large sites of previously developed land. The assessment of potential for additional housing provision within settlements already includes the proposed re-allocation to substantially residential use of 4 existing employment areas.

Within Policy H2 (Extensions to residential envelopes and phasing) and Policy H3 (Extension to residential envelopes post-2021) the District Council has adopted a balanced approach to the distribution of additional housing locations, which is based on identification of tiers of settlements defined by reference to their accessibility to jobs, services and facilities (some of which lie outside the District) and the need to protect the valued environments within the District. This approach is generally supported, although implementation and delivery of individual schemes should give further thought to securing sustainable functional relationships between proposed development locations and availability of jobs, services and facilities.

The proposed scale and phasing of development at each of the identified locations in Policy H2 and Policy H3 should be capable of being supported by County Council service groups, provided that adequate and timely funding is available. The County Council would wish to work with the District Council to ensure that future infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

3. Economic Development

The approach to Employment Growth (Policy ED1) is supported. Given the economic structure of Rochford District the support to be given to protection and enhancement of the role of small and medium sized businesses; enhancement of the District's commercial centres; and development of a skills training academy is particularly welcome. These measures will assist in building on the existing economic resource of the District.

Proposals for the comprehensive development of London Southend Airport and its environs (Policy ED2) are supported.

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The further elaboration of proposals through an Area Action Plan will provide a firm foundation to realise the economic regeneration and growth opportunities presented by effective use of the Airport. The recognition of the potential environmental impact of the Airport and the commitment to work to mitigate any adverse impacts on the environment and local amenities is fully supported.

The location of the proposed Eco-Enterprise Centre to the North of London Southend Airport (Policy ED4) is supported. Creation of the Centre would assist reduction of the rate of business start-up failure in the district. Further the proposed location for the Centre would afford a clear offer to businesses within an area of varied business activity.

The continued protection and enhancement of existing employment land (Policy ED3) is supported, as is the identification of 4 existing employment sites for appropriate alternative, substantially residential, uses. Each of the 4 sites affords particular issues and opportunities whereby their redevelopment for other uses and relocation of existing occupiers would confer advantage for the immediately neighbouring areas and for the District as a whole.

4. Town Centres

The town centres of Rayleigh, Rochford and Hockley, and future plans for them, are closely linked to the economic development of the District but also present the opportunity to offer greater community focus within the District. The varied approach being taken to each of these town centres is supported (Policy RTC4, RTC5 and RTC6), notably the recognition of the role and purpose of the town centres beyond retail uses.

The contribution that the County Library service could make to plans for the town centres should not be overlooked. The 5 libraries in the District are substantial footfall draws in their localities and act as a 'community anchor store'. This has knock-on effects in encouraging use of neighbouring retail and service facilities. Further the Library service is currently looking at co-location opportunities for other services within the libraries which would enable them to act as a community focus.

5. Transport

The transport aspects of the Core Strategy are well balanced in identifying potential measures that would meet the needs of existing residents and businesses in the District as well as needs arising from future development. The approach reflects and makes good reference to the transportation aspirations of the County Council. The policy emphasis on close working between the District Council and the County Council to advance the transport aspirations is welcomed and fully supported.

In relation to parking standards (Policy T8 and Paragraph 10.30) the review undertaken by Essex County Council in conjunction with the Essex Planning Officers Association has now been completed. Revised parking standards have been agreed and signed off as County Supplementary Guidance, in accordance with PPS12, and is being applied by the County Council as Local Highways Authority.

6. Coastal Protection Belt

Policy ENV2 (Coastal Protection Belt) is not supported because in its current form it is not a suitable or effective replacement policy for Policy CC1 of the Replacement Structure Plan. Structure Plan Policy CC1 (The Undeveloped Coast - Coastal Protection Belt) currently remains a 'saved' policy of the Essex and Southend-on-Sea Replacement Structure Plan, April 2001 (following a direction of the Secretary of State, dated 27th September 2007, under paragraph 1(3) of Schedule 8 to the Planning and Compulsory Purchase Act 2004). The existing Policy CC1 reads, 'Within the Coastal Protection Belt defined in adopted local plans there shall be the most stringent restrictions on development within the rural and undeveloped coastline situated outside existing built-up areas, and any development which is exceptionally permitted within this Belt shall not adversely affect the open and rural character, historic features or wildlife.'

Core Strategy Policy ENV2 should be revised to include specific reference to,

- * Definition of the boundary of the Coastal Protection Belt in another Development Plan Document;
- * the application of the most stringent restrictions on development within the rural and undeveloped coastline;
- * any development exceptionally permitted not adversely affecting the open and rural character, historic features or wildlife.

7. Historic Environment

The importance of the historic environment in Rochford District is clearly identified within the Core Strategy document. Nevertheless, the policy guidance could be usefully enhanced to promote consideration and enhancement of the historic environment and use of the historic environment to shape place. This would be achieved by the following amendments to the Core Strategy,

- * Policy ENV1 (Protection and Enhancement of the Natural Landscape and Habitats and the Protection of Historical and Archaeological Sites) should be amended by deletion of the final sentence and its replacement with, The Council is committed to the protection, promotion and enhancement of the diverse historic landscape and extensive surviving archaeological deposits of the District.

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* Paragraph 8.15 of the supporting text should be amended to better support the suggested amendment to Policy ENV1. The existing text of Paragraph 8.15 should be deleted in its entirety and replaced by,
The historic environment of Rochford District has developed through a history of human activity that spans over 450,000 years. Much of the resource lies hidden beneath the ground in the form of archaeological deposits. Other elements such as the historic landscape, the pattern of field, farms, woods and grazing marsh which characterise the District, are a highly visible record of millennia of agriculture, industry and commerce. Of particular significance are the coastal, island and estuarine areas where multi-period landscapes reflecting the exploitation of coastal and marshland resource survive. The District also includes the important historic medieval market towns of Rochford and Rayleigh.

* Page 16 (Sustainable Community Strategy Priority: Promoting a Greener District) should be amended to further support the approach to the Historic Environment. The fourth bullet of the Key Section/Policies of the Core Strategy should be amended to include the word 'historic', so that the first sentence of the bullet would read,
The Environment chapter seeks to protect and enhance the biodiversity, historic and natural environment of the District by protecting sites of local, national and international importance.

8. Community Infrastructure

The approach to Community Infrastructure is supported. The County Council would wish to work with the District Council to ensure that future community infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

In addition, it should be noted that,

* Some County Council services are not highly visible despite being regarded as highly desirable community services by local residents. The need to ensure adequate funding and contributions to enable these services to meet community expectations should be recognised and acknowledged in consideration of planning obligations and standard charges.

* The Adult Community Learning Centre at Rocheway, Rochford could be better located with regard to the wider Rochford/Castle Point area of service. Relocation of the Centre could provide opportunities both at the new location and for the current site.

* The Core Strategy should make specific reference to,

o Appendix H1, Location at South Canewdon: new Early Years and Childcare facilities;

o Policy CLT2, final sentence: insert after the words 'primary schools' the words 'and Early Years and Childcare facilities';

o Appendix CLT1, Other issues/comment: for Early years and childcare facilities add 'Land to be allocated within new residential areas, as appropriate'.

9. Implementation, Delivery and Monitoring

The inclusion in the Core Strategy of a section considering Implementation, Delivery and Monitoring is welcomed and supported. Nevertheless, the District Council, in moving towards implementation and delivery of the individual elements of the Core Strategy, should highlight those schemes and projects that are critical to achievement of other aspects of the Strategy.

Further, the monitoring proposal for Policy H6 (Lifetime Homes) and for Policy CP1 (Design) should be amended,

* Policy H6 (Lifetime Homes) - the identified monitoring tool is Core Indicator H6 Housing Quality Building for Life Assessments. The Building for Life Assessment methodology was devised to measure the overall design/layout quality of housing developments. It was not devised to measure compliance with Lifetime Homes, which is largely, but not exclusively, concerned with internal space standards and the provision of internal arrangements within dwellings to meet needs of all residents.

* Policy CP1 (Design) - the monitoring indicator proposed by the Core Strategy is not supported because it is unclear what the indicator would actually be measuring. The proposed indicator should be replaced by the Core Indicator, Housing Quality - Building for Life Assessments, as suggested by the County Council in its response to the Core Strategy Preferred Options, October 2008. A better approach would be to base evaluation and monitoring of Policy CP1 on the Commission for Architecture and the Built Environment's (CABE) 20 Building for Life principles, particularly as Government has endorsed these principles and is urging local authorities to use them to assess design quality. It is suggested that the monitoring arrangements for Preferred Option CP1 be deleted and replaced by the following text, 'The success of the implementation of this policy will be monitored by assessing schemes, or an appropriate sample of schemes, against the Commission for Architecture and the Built Environment's (CABE) Building for Life principles.'

10. Access to Housing

The Core Strategy notes the higher prevalence of older people in Rochford District and the need to support them. However, a more broadly based approach to access to housing should be adopted by Policies H4, H5 and H6. It should recognise the presence of other vulnerable adults in the community, for example, those with learning or mental health disability, and the range of possible forms of accommodation, including supported, sheltered and extra care accommodation. The high level of owner occupation in the District further emphasises the need for a broader approach. The emphasis on Lifetime Homes would not address the variety of future needs, whilst the potential exemptions to the

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Summary: Lifetime Homes policy standard in Policy H6 are likely to act against demographic trends. Within Policy H2 (Extensions to residential envelopes and phasing) and Policy H3 (Extension to residential envelopes post-2021) the District Council has adopted a balanced approach to the distribution of additional housing locations, which is based on identification of tiers of settlements defined by reference to their accessibility to jobs, services and facilities (some of which lie outside the District) and the need to protect the valued environments within the District. This approach is generally supported, although implementation and delivery of individual schemes should give further thought to securing sustainable functional relationships between proposed development locations and availability of jobs, services and facilities.

The proposed scale and phasing of development at each of the identified locations in Policy H2 and Policy H3 should be capable of being supported by County Council service groups, provided that adequate and timely funding is available. The County Council would wish to work with the District Council to ensure that future infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16826 - 8075 - Policy H3 - Extension to residential envelopes post-2021 - i, ii

16826 Object

CHAPTER 4 Policy H3 - Extension to residential envelopes post-2021

Respondent: Mr Dudley Ball [8075]

Westview
Church Road
Hockley
Essex

SS5 4SS

Agent: Edward Gittins & Associates (Mr Edward Gittins) [8074]

Edward Gittins & Associates
The Mount
Huxtables Lane
Fordham Heath
Colchester
Essex

CO3 9TJ

01206 240321

Full Text:

See attached representations

Council ref AE20

Summary:

See attached representations

Council ref AE20

Change to Plan

See attached representations

Council ref AE20

Appear at exam? Yes

Soundness Tests i, ii

Core Strategy Submission Document

O - 16830 - 8076 - Policy H3 - Extension to residential envelopes post-2021 - i, ii

16830 Object

CHAPTER 4 Policy H3 - Extension to residential envelopes post-2021

Respondent: Crowstone Properties Ltd. [8076]

Crowstone Properties Ltd.
c/o The Agent

CO3 9TJ

Agent: Edward Gittins & Associates (Mr Edward Gittins) [8074]

Edward Gittins & Associates
The Mount
Huxtables Lane
Fordham Heath
Colchester
Essex

CO3 9TJ

01206 240321

Full Text:

See attached representations

Council ref AE21

Summary:

See attached representations

Council ref AE21

Change to Plan

See attached representations

Council ref AE21

Appear at exam? Yes

Soundness Tests i, ii

Core Strategy Submission Document

O - 16849 - 9889 - Policy H3 - Extension to residential envelopes post-2021 - ii

16849 Object

CHAPTER 4 Policy H3 - Extension to residential envelopes post-2021

Respondent: Environment Agency (Miss Carrie Williams) [9889] **Agent:** N/A

Environment Agency
Iceni House
Cobham Road
Ipswich
Suffolk
IP3 9JD
United Kingdom
01473 706007

Full Text: The background evidence includes the Essex Thames Gateway Water Cycle Study Scoping Report carried out by Scott Wilson and completed in March 2009 however the findings of this report have failed to be captured in the policies of the Core Strategy (with the exception of the water efficiency requirements related to the Code for Sustainable Homes in Policy ENV9).

The Scoping Report identifies that in terms of water resources, Essex and Suffolk Water are currently operating at a demand-supply deficit during dry years and that, although the approval of the Abberton reservoir scheme will largely alleviate these problems in the future, the deficit will remain until this scheme comes online in 2014. The Scoping Report therefore recommends that, as well as seeking high levels of water efficiency in new and existing developments, new development is phased up to 2014.

In addition to the water resources issue, the Scoping Study also that there are some potential capacity issues with both the Rochford Wastewater treatment works (WwTW) and the sewerage network associated with it which would need resolving around 2015. There might also be some issues with the quality of discharge from the Rayleigh East WwTW which will require further investigation but could be exacerbated by unphased growth.

In terms of water quality, the three WwTWs serving Rochford District - Rochford, Rayleigh East and Rayleigh West - discharge to tributaries of the Rivers Roach and Crouch which are Shellfish Waters and flow into areas designated under national and international environmental legislation (SSSI, SPA and Ramsar designations) and the water quality of these watercourses is generally poor. Page 48 of the Scoping Study states that further development draining to these three WwTWs has the potential to exacerbate the problem. Again further investigation is required into this issue.

In not addressing the findings of this report we deem the Core Strategy to be unsound in that it is not effective. This is because we do not believe that the Policies set out in the Core Strategy have clearly identified the infrastructure implications of the strategy and the delivery mechanisms and timescales for implementation have not been addressed. There is also an element of inflexibility in failing to recognise the findings of this report and the potential impact on growth delivery.

In order to make the Core Strategy sound, it must incorporate the findings of the Water Cycle Study Scoping Report and recognise the potential constraints to development delivery.

Referring to the report in Policy H3 would be an option. At this stage in the process we would consider it sufficient to include a statement about the intention to phase development in line with the findings of the Scoping Report and subsequent Outline and Detailed Stage Water Cycle Studies. The Site Allocations DPD would require more detailed information to inform the phasing so as to avoid bringing forward sites prematurely.

Please note that should the Inspector deem it necessary for us to attend the Examination in Public, we would be happy to do so but our preferred method at this time would be written representations.

Summary: The background evidence includes the Essex Thames Gateway Water Cycle Study Scoping Report carried out by Scott Wilson and completed in March 2009 however the findings of this report have failed to be captured in the policies of the Core Strategy (with the exception of the water efficiency requirements related to the Code for Sustainable Homes in Policy ENV9).

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In addition to the water resources issue, the Scoping Study also that there are some potential capacity issues with both the Rochford Wastewater treatment works (WwTW) and the sewerage network associated with it which would need resolving around 2015. There might also be some issues with the quality of discharge from the Rayleigh East WwTW which will require further investigation but could be exacerbated by unphased growth.

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O - 16849 - 9889 - Policy H3 - Extension to residential envelopes post-2021 - ii

16849 Object

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these watercourses is generally poor. Page 48 of the Scoping Study states that further development draining to these three WWTWs has the potential to exacerbate the problem. Again further investigation is required into this issue.

In not addressing the findings of this report we deem the Core Strategy to be unsound in that it is not effective. This is because we do not believe that the Policies set out in the Core Strategy have clearly identified the infrastructure implications of the strategy and the delivery mechanisms and timescales for implementation have not been addressed. There is also an element of inflexibility in failing to recognise the findings of this report and the potential impact on growth delivery.

Please note that should the Inspector deem it necessary for us to attend the Examination in Public, we would be happy to do so but our preferred method at this time would be written representations.

Change to Plan In order to make the Core Strategy sound, it must incorporate the findings of the Water Cycle Study Scoping Report and recognise the potential constraints to development delivery.

Referring to the report in Policy H3 would be an option. At this stage in the process we would consider it sufficient to include a statement about the intention to phase development in line with the findings of the Scoping Report and subsequent Outline and Detailed Stage Water Cycle Studies. The Site Allocations DPD would require more detailed information to inform the phasing so as to avoid bringing forward sites prematurely.

Appear at exam? No

Soundness Tests ii

Core Strategy Submission Document

O - 16871 - 14274 - Policy H3 - Extension to residential envelopes post-2021 - i, ii

16871 Object

CHAPTER 4 Policy H3 - Extension to residential envelopes post-2021

Respondent: Knight Developments [14274]

Knight Developments
C/o agent

Mr T Dodkins
Strutt & Parker
Coval Hall
Rainsford Road
Chelmsford
Essex

Agent: Strutt & Parker (Mr Trevor Dodkins) [8117]

Strutt & Parker
Coval Hall
Rainsford Road
Chelmsford
Essex

CM1 2QF

01245254603

Full Text:

The submission document fails the test of soundness for policy H3 in terms of not being justified. The policy is not founded on a robust and credible evidence base and it is not the most appropriate strategy when considered against reasonable alternatives of allocating sufficient housing in the tier 1 category town of Rayleigh which meets the Council's sustainability criteria. Furthermore Policy H3 of the Submission DPD is not considered to be sufficiently flexible to deal with any changes to the RSS by being reliant on less sites and again fails the test on flexibility grounds. See accompanying Strutt and Parker Planning Document and Cannon Consulting Initial Highways Access and Accessibility Statement.

(Council ref AE27 and AE27a)

The change required to the DPD to make Policy H3 sound is for the inclusion of the site to the south west of Rayleigh for at least 100 houses in the plan period.

Representation submitted in relation to proposed allocation of housing to the south west of Rayleigh and attendance required at examination to support the allocation of this site which is not in the submission document (see other responses to Core Strategy).

Summary:

The submission document fails the test of soundness for policy H3 in terms of not being justified. The policy is not founded on a robust and credible evidence base and it is not the most appropriate strategy when considered against reasonable alternatives of allocating sufficient housing in the tier 1 category town of Rayleigh which meets the Council's sustainability criteria. Furthermore Policy H3 of the Submission DPD is not considered to be sufficiently flexible to deal with any changes to the RSS by being reliant on less sites and again fails the test on flexibility grounds. See accompanying Strutt and Parker Planning Document and Cannon Consulting Initial Highways Access and Accessibility Statement.

(Council ref AE27 and AE27a)

Change to Plan

The change required to the DPD to make Policy H3 sound is for the inclusion of the site to the south west of Rayleigh for at least 100 houses in the plan period.

Appear at exam? Yes

Soundness Tests i, ii

Core Strategy Submission Document

O - 16875 - 8329 - Policy H3 - Extension to residential envelopes post-2021 - i

16875 Object

CHAPTER 4 Policy H3 - Extension to residential envelopes post-2021

Respondent: Swan Hill Homes Limited [8329]

Swan Hill Homes Limited
C/O Agent
Mr P Kneen
Charles Planning

Agent: Charles Planning Associates Ltd (Mr P Kneen) [5040]

Charles Planning Associates Ltd
1644-1645 Parkway
Solent Business Park
Whiteley
Fareham
Hampshire
PO15 7AH
01489 580853

Full Text:

1.0 Instruction and Introduction

1.1 Charles Planning Associates Limited (Chartered Town Planners) is Instructed by Swan Hill Homes Limited (Swan Hill) to prepare and submit representations on their behalf in respect of the Rochford District Local Development Framework: Core Strategy Submission (September 2009) Development Plan Document.

1.2 The comments refer to the relevant sections and policy designations in the Submission document, as appropriate.

1.3 The comments set out in this submission are intended to assist the District Council in taking forward its Local Development Framework. It is our intention to continue to be involved in the LDF preparation process and we look forward to the opportunity to comment further at the Examination to the Core Strategy.

1.4 If you have any queries regarding the content of this submission then please do not hesitate to contact:

Peter Kneen BSc (Hons) MSc MRTPI
Planner

2.0 Housing:

Policy H1 - The Efficient Use of Land for Housing

2.1 Swan Hill recognises the importance of seeking to concentrate new developments mainly in the existing urban areas, on previously developed land where possible, particularly in view of the Government seeking to ensure 60% of all such new developments are on previously development land (PDL).

2.2 However, given the character of the District, and the strategic housing requirement of the East of England Plan, Swan Hill supports the approach that the Council must also make provision for additional development on the edge of existing settlements on greenfield sites, particularly in the most sustainable locations. As such, Swan Hill supports that where feasible, the redevelopment of existing employment sites for residential/employment purposes can make a contribution towards the strategic housing requirement, provided that sufficient additional employment land is brought forward to ensure the stability of employment levels in the District, and to ensure employment growth meets the East of England Plan requirements.

2.3 Swan Hill considers that Policy H1 should include consideration that new extensions to existing settlements have regard to their potential impact on the wider characteristics and openness objectives of the Green Belt.

Policy H2 - Extensions to Residential Envelopes and Phasing

2.4 Swan Hill generally supports the approach taken by the Council in this policy. As set out above, Swan Hill consider the Council's acknowledgment that housing requirements should be met through the allocation of land on the edge of the existing settlements is the most suitable way forward to meeting the Council's strategic housing requirement and complies with the advice in PPS3.

2.5 The need for suitable greenfield urban extensions represents the best way forward for the Council to meet its strategic housing requirement, as set out in the East of England Plan. Swan Hill supports the recognition that the potential supply of alternative previously developed sites is limited, without detrimentally affecting the character of the District, and therefore the best way forward is the use of sustainable greenfield urban extensions to the existing settlements of the District.

2.6 However, Swan Hill consider that a fundamental consideration that the District Council should consider relates to the potential impact of the urban extensions on the Green Belt policy has been somewhat overlooked. The wider sustainability credentials of the settlements of the District should only be one of many key considerations for determining the level of expansion. In view of the proximity of Southend-on-Sea to all the main settlements of the District, and the influence this has on the likely location many people would travel for employment and leisure, sustainability of many of the settlements is not a key overarching factor, and greater weight should be placed on the potential impact on the openness of the Green Belt, as this cannot be remedied if development occurs in the wrong location.

2.7 As such, Swan Hill considers that determining the location of growth for the main settlements should be to identify

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those locations where the impact on the wider setting of the Green Belt can be minimised. Further justification for those general locations chosen should be identified in Policy H2. In this regard, Swan Hill has serious concerns regarding the removal of Land South West of Great Wakering as a viable option for the growth of the settlement. The development of this area of Great Wakering, in addition to the potential redevelopment of the Star Lane Industrial Estate could provide a more comprehensive development, whilst ensuring that the wider openness of the Green Belt is maintained. Land South West of Great Wakering is significantly better placed to limit the impact on the wider Green Belt than Land West of Great Wakering, and could contribute to the provision of an important amenity and wildlife site for the local community.

2.8 In addition, Swan Hill consider that the Council now has no reserve provision in the event that any of the existing employment sites set out in Policy H1 fail to come forward for development within the envisaged timescale. Further, Land West of Great Wakering has not been identified in the SHLAA as a deliverable site to help meet the strategic housing requirement, contrary to the requirement set out in PPS3.

2.9 As such, Swan Hill would support the provision of suitable sites which could be safeguarded for future development in the likelihood of a shortfall in supply.

Policy H3 - Extensions to Residential Envelopes Post 2021

2.10 As set out above, Swan Hill supports the overall approach the Council has taken towards the provision of sustainable urban extensions as a suitable means of meeting their strategic housing requirement. However, as set out for Policy H2 above, Swan Hill has serious concerns regarding the removal of several proposed sites set out in the October 2008 Preferred Options Core Strategy, without any guarantee of the ability to deliver those sites set out in Policy H1.

2.11 As also considered above, the inclusion of West of Great Wakering for 250 dwellings should not be included ahead of South West of Great Wakering, in view of the fact that the site is not identified in the SHLAA as available, suitable and achievable as required by PPS3, and thus is not supported by a robust and creditable evidence base for its inclusion as a strategic site for development.

2.12 Whilst Swan Hill acknowledge that alterations to Policy H1 has resulted in the removal of some locations for growth in Policy H3 (as set out in the Sustainability Appraisal), Swan Hill does not consider that the most appropriate locations have been chosen.

2.13 In addition to the matters raised above, the use of West of Great Wakering would also result in the loss of valuable agricultural land, which clearly in a Green Belt location, should be less suitable for development than other sites, such as South West of Great Wakering, which would have limited impact on the wider Green Belt policy, and not result in the loss of valuable agricultural land.

2.14 Finally, in respect of Policies H1, H2 and H3, all of the above comments are based on our interpretation of the Submission Version Core Strategy when compared to the October 2008 Version of the Core Strategy. Without the ability to undertake a detailed assessment of the Council's SHLAA, it is not possible to clarify the proposed Core Strategy position regarding the proposed direction of growth proposed for the settlements in the District. As such, Swan Hill reserves the right to make additional representations regarding the proposed Policies H1, H2 and H3 following the publication of the SHLAA in due course.

Policy H4 - Affordable Housing

2.15 In general terms, Swan Hill supports the approach taken by the Council towards the provision of affordable housing for new residential developments. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H5 - Dwelling Types

2.16 Swan Hill supports the policy provision of H5, and considers that the approach taken by the Council for this policy represents a suitably flexible alternative to stipulating percentages of dwelling mix, sought by some local authorities. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H6 - Lifetime Homes

2.17 In regard to this policy, Swan Hill objects to the Council's policy where all new dwellings should be provided to the Lifetime Homes Standard. Whilst it is acknowledged that the UK has an aging population, Swan Hill considers that seeking to provide Lifetime Homes on all sites is considered to be overly onerous for proposed developers, particularly when considering the requirement for all car parking spaces to be suitable for disabled users, which could result in more schemes becoming unviable. Therefore, the provision of a percentage of Lifetime Homes should be considered through negotiations with the Council at the planning application stage, and should be determined on a case-by-case basis.

3.0 Character of Place: Policy CP1 - Design

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3.1 The Town and Country Planning (General Development Procedure) Order 1995 (As Amended) makes the submission of a Design and Access Statement for most types of planning applications a Statutory requirement, and as such, the provision of a Design Brief represents a pre-requisite of all major planning applications.

3.2 Policy CP1 seeks to ensure the provision of good, high quality developments that reflect local characteristics and distinctiveness, this ideology is supported by Swan Hill.

4.0 The Green Belt:
Policy GB1 - Green Belt Protection

4.1 Following the amendments to the wording of the Policy since the October 2008 Preferred Options Core Strategy, Swan Hill is now generally supportive of Policy GB1 and its supporting text. However, as expressed above, it is important that where alterations to the Green Belt boundary occur as a result of the extension of the settlements to meet the strategic housing requirement, both the minimal amount of land is taken and where that land is taken for development, it represents the best available land which has a minimal impact of the wider openness characteristic of the Green Belt.

5.0 Environmental Issues:
Policy ENV3 - Flood Risk

5.1 Swan Hill generally supports the approach set out in Policy ENV3 regarding ensuring development accords with the sequential test of PPS25. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV4 - Sustainable Drainage Systems (SUDS)

5.2 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV4. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV8 - On-site Renewable and Low Carbon Energy Generation

5.3 Whilst Swan Hill recognises the importance of reducing carbon emissions, particularly in new housing developments, and the role this can play in reducing the nations overall Greenhouse emissions. As such Swan Hill is generally supportive of Policy ENV8. It is noted that Policy ENG1 of the East of England Plan sets out a threshold of developments comprising 10 or more dwellings. Swan Hill consider it important for the District Council to justify the reduction in the threshold level.

5.4 Further, no assessment of Policy ENV8 has been set out in the Sustainability Appraisal which justifies the change in threshold from that of Policy ENG1 of the RSS.

Policy ENV9 - Code for Sustainable Homes

5.5 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV9. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

6.0 Community Infrastructure, Leisure and Tourism:
Policy CLT1 - Planning Obligations and Standard Charges

6.1 Swan Hill generally supports the overall approach the Council has taken in Policy CLT1. It is considered Policy CLT1 sets out a degree of flexibility to ensure that all sites are considered on a site-by-site basis, assessing the individual merits of each planning application, in order to ensure the levels of contributions applicable meet the five tests of Circular 05/05. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policies CLT5 - Open Space;
CLT7 - Play Space;
CLT8 - Youth Facilities; and,
CLT10 - Playing Pitches

6.2 Swan Hill supports the need for new residential developments to incorporate a degree of new publicly accessible open space, children's play space, youth facilities and playing pitches, and as such, generally supports the policy approaches taken by the Council.

6.3 However, it is important that whilst the Council may seek to undertake an assessment of providing standard charges for new development, which, as set out in Policy CLT1, this should be based on thorough public consultation and consideration and sound justification. Swan Hill consider that within the provision of a standard charge, it is important that such provision allows for a degree of flexibility to ensure that each site is assessed individually and on its own merits. This is particularly important for those sites close to existing open spaces and facilities. As such, the levels of

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open space and recreation facilities required in the 'standard charge' should be based on an up-to-date PPG17 Open Space assessment, which should be used to form a key consideration in the levels of provision likely to be required in the standard charge system proposed.

7.0 Transport: Policy T1 - Highways

7.1 Swan Hill supports the overall objectives set out in Policy T1 requiring developments to be located and designed to reduce the reliance on the private car and to meet the infrastructure needs generated by development or seek to help achieve these needs is acceptable in principle.

7.2 Swan Hill recognises the importance of providing sufficient infrastructure provision to meet the requirements of development, and that where developments have insufficient consideration of impact on existing infrastructure, they should be considered unacceptable and contrary to National policy guidance. However, Swan Hill considers it important to emphasise that the developer's role should not be seen as a means to meet existing shortfalls in provision.

Policy T3 - Public Transport

7.3 Swan Hill is generally supportive of the policy approach set out in T3, however, as set out in paragraph 7.2 above, it is important that the District Council do not consider that it is the developer's responsibility to resolve existing shortfalls in provision of public transport, and any contribution towards additional public transportation provision should only be to mitigate against the additional level of demand likely from the development proposed.

Policy T5 - Cycling and Walking

7.4 Swan Hill supports the general approach to this policy, as Swan Hill recognises the importance of promoting the use of alternatives to the private car. The policy provision acknowledges the need to ensure relevant contributions in the event of additional travel demands generated by individual developments, whilst also setting out additional aspirations for the cycle network in the District.

7.5 As such, Swan Hill considers this policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy T8 - Parking Standards

7.6 The Council has recently (January 2007) adopted SPD on the requirements for parking standards, and as such, Swan Hill generally supports the policy approach chosen by the Council. As set out in the SPD, whilst Swan Hill generally supports the approach taken by the District Council towards setting residential parking standards, in that the Council has recognised that in the suburban areas, even with some access to public transport, the majority of residents will rely on the use of private cars. However, Swan Hill has concerns over the failure of the District Council to comply with the provisions of PPG13: Transport (2001) which sets out that Local Planning Authorities should not set minimum standards for car parking. Whilst it is acknowledged that PPS3 sets out provision for the consideration of local circumstances, it is considered that the Council has not justified this deviation from PPG13's maximum standard.

7.7 Whilst it is acknowledged that such justification may become apparent through the work currently being undertaken by Essex County Council, until such time, the District Council should only seek to apply the maximum standards indicated in PPG13. However, Swan Hill recommends that the District Council make provisions in the wording of the Policy to allow for changes in the event that future policy on car parking standards need to reflect the County standard, following the completion of the County Council review.

8.0 Economic Development: Policies ED3 - Existing Employment Land ED4 - Future Employment Allocations

8.1 In respect of Policies ED3 and ED4, Swan Hill notes that they have changed considerably since the October 2008 Preferred Options document, in that they are site specific regarding the location of the proposed redevelopment of existing employment sites. These four sites are also identified in Policy H1 - Efficient Use of Land, and in general, Swan Hill supports the approach to the redevelopment of these sites (where feasible) based on the assessments of the sites set out in this version of the Core Strategy.

8.2 However, Swan Hill has concerns that these policies might not be considered suitably sound given that insufficient opportunity has been allocated for consultation on their redevelopment. Without the SHLAA being publically available prior to the consultation on this Core Strategy, an insufficient evidence base has been provided to corroborate that these sites are neither suitable or deliverable to meet the test of soundness requirements.

Summary: Policy H3 - Extensions to Residential Envelopes Post 2021

2.10 As set out above, Swan Hill supports the overall approach the Council has taken towards the provision of sustainable urban extensions as a suitable means of meeting their strategic housing requirement. However, as set out

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for Policy H2 above, Swan Hill has serious concerns regarding the removal of several proposed sites set out in the October 2008 Preferred Options Core Strategy, without any guarantee of the ability to deliver those sites set out in Policy H1.

2.11 As also considered above, the inclusion of West of Great Wakering for 250 dwellings should not be included ahead of South West of Great Wakering, in view of the fact that the site is not identified in the SHLAA as available, suitable and achievable as required by PPS3, and thus is not supported by a robust and credible evidence base for its inclusion as a strategic site for development.

2.12 Whilst Swan Hill acknowledge that alterations to Policy H1 has resulted in the removal of some locations for growth in Policy H3 (as set out in the Sustainability Appraisal), Swan Hill does not consider that the most appropriate locations have been chosen.

2.13 In addition to the matters raised above, the use of West of Great Wakering would also result in the loss of valuable agricultural land, which clearly in a Green Belt location, should be less suitable for development than other sites, such as South West of Great Wakering, which would have limited impact on the wider Green Belt policy, and not result in the loss of valuable agricultural land.

2.14 Finally, in respect of Policies H1, H2 and H3, all of the above comments are based on our interpretation of the Submission Version Core Strategy when compared to the October 2008 Version of the Core Strategy. Without the ability to undertake a detailed assessment of the Council's SHLAA, it is not possible to clarify the proposed Core Strategy position regarding the proposed direction of growth proposed for the settlements in the District. As such, Swan Hill reserves the right to make additional representations regarding the proposed Policies H1, H2 and H3 following the publication of the SHLAA in due course.

Change to Plan

Appear at exam? Yes **Soundness Tests** i

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O - 16897 - 14275 - Policy H3 - Extension to residential envelopes post-2021 - i, ii

16897 Object

CHAPTER 4 Policy H3 - Extension to residential envelopes post-2021

Respondent: Southern and Regional Developments Ltd [14275] **Agent:** Strutt & Parker (Mr Trevor Dodkins) [8117]

Southern and Regional Developments Ltd
Unknown - represented by

Mr T Dodkins
Strutt and Parker
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01245254603

Full Text: We disagree with Policy H3 that the site to the south west of Hullbridge should be developed within the timescale post 2021.

Within the soundness test of coherence, consistency and effectiveness tests, text ix. states 'is it reasonably flexible to enable it to deal with changing circumstances.' The site to the south west of Hullbridge can be bought forward in an earlier timeframe with no known constraints for development prior to 2021.

Within the soundness test of coherence, consistency and effectiveness test, text viii. states 'There are clear mechanisms for implementations and monitoring.' This is essential within the plan so that sites can be bought forward and delivered at the most appropriate times.

See accompanying Strutt and Parker Planning Document, Cannon Consulting Transport Assessment and Flood Risk, Drainage and Services Report. Council ref AE29, AE29a and AE29b.

The change that is required to Policy H3 is that the proposed housing allocation to the south west of Hullbridge should be removed from the timeframe post 2021 and included in the earlier timeframe within Policy H2.

Representation submitted in relation to proposed allocation of housing to the south west of Hullbridge. Attendance required at examination to support this allocation.

Summary: We disagree with Policy H3 that the site to the south west of Hullbridge should be developed within the timescale post 2021.

Within the soundness test of coherence, consistency and effectiveness tests, text ix. states 'is it reasonably flexible to enable it to deal with changing circumstances.' The site to the south west of Hullbridge can be bought forward in an earlier timeframe with no known constraints for development prior to 2021.

Within the soundness test of coherence, consistency and effectiveness test, text viii. states 'There are clear mechanisms for implementations and monitoring.' This is essential within the plan so that sites can be bought forward and delivered at the most appropriate times.

See accompanying Strutt and Parker Planning Document, Cannon Consulting Transport Assessment and Flood Risk, Drainage and Services Report. Council ref AE29, AE29a and AE29b.

Change to Plan The change that is required to Policy H3 is that the proposed housing allocation to the south west of Hullbridge should be removed from the timeframe post 2021 and included in the earlier timeframe within Policy H2.

Appear at exam? Yes **Soundness Tests** i, ii

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O - 16920 - 10009 - Policy H3 - Extension to residential envelopes post-2021 - i, ii

16920 Object

CHAPTER 4 Policy H3 - Extension to residential envelopes post-2021

Respondent: Barratt Eastern Counties [10009]

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Agent: Kember Loudon Williams Ltd (Mr Martin Hull) [8466]

Kember Loudon Williams Ltd
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01892 750018

Full Text: Local Development Framework

Representations on the Core Strategy
Submission Document, November 2009
On behalf of Barratts Eastern Counties

Introduction

The requirements of Core Strategies are enshrined in the 2004 Planning and Compensation Act, the Town & Country Planning (Local Development) England (Regulations) 2004 and the 2008 policy guidance in PPS12. The requirements of Coe Strategies are clear. And they are legal requirements. The Core Strategy must comply with the Local Development Scheme, Statement of Community Involvement and the Regulations. The Core Strategy must be subject to a sustainability appraisal, have regard to national guidance, conform generally with the Regional Spatial Strategy and have regard to any Sustainable Community Strategy. A Core strategy must be sound - justified, effective and consistent with national policy. The following representations therefore focus on these legal requirements.

HOUSING

Paragraph 4.6 - Evidence Base

To meet the soundness test Submission Core Strategies (SCS) must be justified, that is to say it must be founded on robust and credible evidence base and comprise the most appropriate strategy when considered against reasonable alternatives. The housing strategy in as far as it identifies a need for Green belt sites is sound, however, there are other elements which are unsound.

Paragraph 4.6 notes that the Strategic Housing Land Availability Assessment (SHLAA) has examined the supply of housing. It is presumed that the Table at paragraph 4.6 is the outcome of this examination. Whilst the SHLAA has some legitimacy in that it identifies various sites that are apparently available, we are concerned that because the SHLAA was only published in November 2009 it post dates the SCS. This implies that the SCS is driving the SHLAA exercise rather than the other way round. Whilst this may have no real practical effect on the outcome of the SCS and the identified need for Green Belt sites, the Inspector will be mindful of the advice in paragraphs 33 and 54 of PPS3 that SCS draw on the evidence in SHLAA. It may be that the SCS should explain how the evidence base has been used to justify the strategy.

PPS12 explains at paragraph 4.37 that Core Strategies are based on thorough evidence. Since the SHLAA has only recently been published it is considered that the SCS is unsound as it is not justifiable. This, together with other comments on the SCS, indicates that the process should be delayed to ensure that a more robust document is placed in front of the EiP Inspector.

Table at Paragraph 4.6 - Evidence base

From our review of the available evidence it would appear that the housing land supply is insufficient and that Green Belt release are required. From the wider strategy being promoted we note that some of the sites that the District Council consider to be 'appropriate' are likely to relate to existing employment areas. As set out elsewhere in our representations, we maintain severe reservations that the redevelopment of existing employment sites for alternative uses and particularly the Eldon Way Industrial Estate is unsustainable. We will make reference to the effectiveness of this strategy in relation to sustainability, whether it is justified in the context of National Policy and the deliverability of such a strategy elsewhere.

In particular, paragraph 11.32 of the SCS refers to existing employment land and sites within the UCS. It does not refer the SHLAA and as such it appears that an evidence base to support the re-use of employment land for residential is not reported in the SCS.

Having reviewed the 2008 Annual Monitoring Report, as we did when commenting on the 2008 Preferred Options Core Strategy, we maintain severe doubts as to the appropriateness of some of the previously developed sites identified as potential housing sites and their expected housing yield. Whilst we cannot at this stage ascertain whether the SHLAA

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sites referred to in this table correlate with the Annual Monitoring Report and indeed the 2007 Urban Capacity Study, it is our view that there will be some commonality and so the reliance on these sites is likely to be at odds with Government Policy. We shall elaborate on this objection in relation to the specific housing policy below.

We note that the last two rows in the Table at paragraph 4.6 set out figures with and without Green Belt releases. The text to this section of the Core Strategy should, for reasons of clarity, explain that Green belt review will be necessary in order to deliver the required housing.

Paragraph 4.9

The table on page 40, which sets out the settlement tiers, is supported. Rayleigh, Rochford/Ashingdon, Hockley/Hawkwell are clearly the largest settlements in the District and they benefit from good employment, housing, leisure, community and public transport provision. These settlements are the most sustainable ones with the greatest mix of uses. Consequently, it is sensible that the Core Strategy identifies these as top tier settlements and is able to target them with growth accordingly. This component of the strategy is justified by reference to sustainability data and is effective, since targeting development at these locations will ensure a more sustainable pattern of development.

Paragraph 4.14

We maintain that the strategy for redeveloping the Eldon Way Industrial Estate for housing and other alternative uses to employment is unsound. It is neither justified nor effective. The Industrial Land Availability Study 2006 sets out on page 7 strategic objectives. The 3rd objective seeks to Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive. Clearly the strategy as currently drafted envisages major changes to existing industrial estates, including alternative uses. This strategy is not consistent with other strategies and evidence based studies and so cannot be justified in the context of the tests set out in PPS12. It is also an ineffective strategy since the new employment locations that would free up the Eldon Way site for redevelopment relies on transport infrastructure that has no certainty of being delivered. Principally, the erosion of employment uses at Eldon Way could make the settlement of Hockley/Hawkwell less sustainable and thus conflict with the tiered approach on page 40, paragraph 4.9.

Policy H1

Prioritising the use of previously developed land ("pdl") is supported in principle. It is a justified strategy in the context of PPS3 and effective as sequential choices can be made by implementing the policy. However, the District Council is also promoting a strategy which seeks the redevelopment of existing employment locations to alternative uses and by consequence is identifying green field sites for new employment development elsewhere (Policy ED4 refers). This 'land swapping' is not considered consistent with PPS3, nor is it considered to be justified or effective in delivering the desired strategy. This is particularly the case as most of the existing employment sites are occupied and therefore unavailable for redevelopment. In addition, the new Greenfield sites are in an arguably less sustainable locations away from the top tier settlements identified on page 40 of the Submission Core Strategy. Clearly this element of the strategy is inconsistent with the wider strategy.

The Industrial Land Availability Study 2006 is included as an evidence base by the District Council. It includes an introductory section, which explains that the authority wishes to make Rochford the place of choice for new business. It includes several strategic objectives on page 7 including "Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive." It reviews existing employment areas and identifies vacant land, including land available from allocations. It does not include any assessment of new sites or potential opportunities for new sites that might have been expected to feed into the Core Strategy. The strategy for identifying Green Belt site employment allocation does not appear to be based on any evidence in this document and in that context cannot be justified. The strategy being promoted potentially conflicts with Government policy in PPG13, PPG2 and emerging PPS4.

The Employment Land Study 2008 is a much later document. It has a key recommendation on page ii "we recommend that Rochford District Council adopts strong policies to protect existing employment land." Furthermore under recommendations for existing sites on page iii-iv of that document it states "In our view, Hockley Trading Centre is a strategically well placed employment location. However, we recognise the ambitions of the Hockley Town Centre masterplan and that within this the Council should consider it to be allocated for other uses. However, we recommend that this reallocation happen only if provision is made within the masterplan for office use within Hockley Town Centre as part of a mixed use scheme." The view of the writers of this document is clear - the Eldon Way Industrial estate (Hockley Trading Centre) is a good employment site and that it is for other reasons that alternative uses are being considered and only then if office development is supported. This supports our representations that new future uses at the Eldon Way site should be employment dominated and that alternative uses should relate to the objectives of the Town Centre which is to enhance the shopping and leisure facilities. Residential is not an appropriate alternative.

This document recommends the use of land to the west of Rayleigh for employment and envisages Green belt release. However, the SCS does not explain through the evidence base why existing employment sites should be 'deallocated' and Green belt land unnecessarily used.

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In addition to these key issues we have some specific concerns. As a consequence we maintain an objection to the second paragraph of Policy H1. This policy states that the Council will seek the redevelopment of various industrial estates including Eldon Way. The Policy says that alternative uses will be sought (presumably alternative to the existing employment offer) and that new land will be allocated elsewhere. This policy statement, in relation to Eldon Way in particular, is unsound for a number of reasons:

The emerging Hockley Area Action Plan consulted upon in 2008 states that the Eldon Way Industrial Estate is strategically well placed. In a sense this statement underplays the true importance of this highly sustainable employment location and only major employment area in Hockley/Hawkwell. The employment area is adjacent to the railway station and located a short distance from the main bus routes that run along Spa Road. Some of the residential areas of the town are also within walking distance of this commercial area, thus providing a potential for sustainable travel by employees. The Eldon Way Industrial Estate is therefore right at the heart of the settlement of Hockley/Hawkwell and provides an opportunity to meet sustainable transport objectives by reducing the need to travel by car. Consequently, this employment area should be highlighted as a premier employment site in sustainability terms, both in the context of PPG13, PPG4 and PPS6. To encourage alternative uses as set out in Policy H1 implies the removal of the majority of employment based activity at Hockley/Hawkwell and this would be contrary to National policy, would not be the most appropriate strategy when considered against alternatives and is therefore unsound.

Whilst it is acknowledged that improvement to the Eldon Way Industrial Estate can and should take place, the extent to which the mix of employment uses should be altered in favour of alternative land uses requires careful consideration. It is our view that a mix of existing or indeed new employment land uses with some Town Centre type uses should dominate the Eldon Way site. A mix of employment types between offices, light industry and other high technology industries should be encouraged as this will provide many locational advantages to the firms that agglomerate together. The Council says that the existing uses on this site are harmful to amenity. However, the site has operated for many years without any significant issues and if renewal for B1 type uses are encouraged then the employment area can be maintained without harm to amenity. Renewal of the employment stock can help develop and improve trade, improve the sustainability of businesses as a whole and make for a more flexible labour market as skill levels are varied. A singularly different use altogether or a variety of uses which excludes employment could undermine the long term sustainability of the area and Town Centre. As such Policy H1 is not an effective strategy and should be amended to acknowledge the importance of Eldon Way and the need to renew the employment stock to ensure that the site maintains its important role as a employment site, albeit with some ancillary alternative use development where appropriate.

The 2008 Retail Study notes that Hockley Town Centre is not strong and there is trade leakage. Eldon Way Industrial Estate provides a customer base for existing town centre uses. Weekday spending within town centres is an important contributor to the viability of many retail and leisure businesses either through expenditure by employees during the lunchtime trade or expenditure by employers, on necessary goods and services. This relationship helps sustain the critical mass of a centre and provides a platform for new retail and leisure growth. It is important to have a balanced centre with a variety of uses. Policy H1, as currently drafted, implies the removal of employment related development and this is likely to harm the vitality and viability of Hockley Town Centre. The Council has presented no evidence to suggest that this is not the case. Importantly, the 2008 Retail Study explains that there is a need for additional retail and office space. In principle we would support additional office and other B1 type uses plus retail but employment uses should always dominate for the sustainability reasons given above. Retail and office development are likely to present a viable alternative to some of the more industrial type uses.

Consequently, we do not support the phrasing of the third paragraph of Policy H1 and maintain that the most appropriate strategy is to seek renewal of the employment stock with employment based uses and with some new retail development. Removal of employment land uses completely as currently implied-which was the approach adopted in the emerging Hockley Area Action Plan - is not a justifiable strategy.

One of the key tests of a Core Strategy is consistency between policies in the emerging Plan and this strikes at the heart of demonstrating an effective strategy. Policy H1 implies alternative uses to employment and the relocation of Eldon Way to a site identified under Policy ED4. However, Policy RTC6 sets out a suite of policy criteria for Hockley Town Centre which includes employment and commercial activities. In addition Policy ED3 seeks the protection of sustainable employment sites (Eldon Way) and notes that some reallocation of existing employment sites will include a proportion of employment. It notes that in the case of Eldon Way employment development will form a component. The policies appear at odds with one another. The third paragraph of Policy H1 should be deleted as the second paragraph is sufficient to set a strategic context for delivering new housing development. The employment policies and Hockley specific policies should be left to consider the type and quantum of land uses appropriate in the area. If the third paragraph of H1 is to be retained then it should tie in more with Policy RTC6 and in our view explain that employment uses should dominate any redevelopment proposals for the Eldon Way site and that retail and leisure uses should be a supporting proportion.

Implementation, Monitoring and Delivery - page 132 onwards

One of the key tests of soundness is that the Core Strategy should be effective - it should be able to deliver its strategy. The Implementation strategy set out at page 132 onwards of the Core Strategy does not explain how Policy H1, RTC6 and the strategy for redeveloping Eldon Way (Policy ED2 and ED3) will be delivered. The comment at Policy ED3 on

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page 161 identifies it as a potential risk and alludes to land assembly difficulties and the choices to be made by owner/occupiers. In order to deliver the strategy there should be a clear understanding as to whether the new land use values being promoted are sufficient to encourage relocation voluntarily. Secondly there is a need for more information to be gathered and presented to show that current occupiers and landowners are willing to relocate and the timescales likely for this. For example, do the building lease contracts enable early review or are there any break out clauses. There should be some commentary on whether the Council will engage in compulsory purchase orders to pursue their strategy should the 'encouragement' route fail. As currently drafted there is no clear path to deliver the strategy and the danger is that despite reallocation, the sites identified for redevelopment will not come forward in the plan period. In this regard, evidence to satisfy the test of soundness is not provided.

Policy H2 - General Locations

We support the strategy that new housing growth should be targeted at land South of Hawkwell. This area is suitably located to the urban area of Hockley/Hawkwell and to tie in with the settlement tiers on page 40 of the Submission Core Strategy the same terminology for settlement should be used. This ensures a consistency within the SCS. The choice of this location as a housing growth area is appropriate as it would not contribute to the coalescence of the urban area with Ashingdon (there is existing development between this identified housing area at Rectory Road and Ashingdon and moreover, Rectory Road can form a natural physical boundary for the new Green belt boundary. This area is also well located to the existing road network. Cherry Orchard Way has recently been improved and provides much better accessibility to the proposed housing growth area than any other location around Hockley/Hawkwell. The existing bus routes along Rectory Road also make this location sustainable and the additional housing proposed will help underpin the financial viability of bus routes in this area. Locally there are employment opportunities, including the small commercial estate off Main Road. The Eldon Way Industrial Estate adjacent to the Town Centre also provides the opportunity for employment locally. Extensive public open space, play pitches and built leisure facilities are located just to the north of this area and a community hall is located off Briar Close, nearby. The area to the south of Hockley/Hawkwell is close to local shops on the corner of Heycroft Road and Main Road and there are numerous footpath links between this area and the local community including links via Thorpe Road, Thorpe Close, Briar Close, Hawkwell Park and Park Gardens. The area therefore provides the opportunity to enhance existing links, including cycle links, and contribute towards community integration - more so than other sites on the south side of this settlement. The site is also in the control of one house builder and deliverable.

However, we find that the Policy is not fully consistent with national policy and furthermore needs to be reviewed in order to be justified and effective. We have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with this policy and feel that Green Belt review should be more explicit throughout the SCS. We note that it is only Policy H3 which indicates the need for Green Belt land review. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H2 and certainly Policy H3 and Policy GB1 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary.

Policy H2 - Phasing and Quantum

The 2008 Preferred Core Strategy document indicated that the area south of Hawkwell should deliver 330 dwellings over a phasing period to post 2021 (see Policy H2 and H3 of that document). The SCS reduces the quantum of housing in this area to 175 but expects delivery by 2015. At a broader level the Preferred Options Core Strategy of 2008, (Policy H2) required 1,450 dwellings to 2015 and a further 1,050 by 2021. In the SCS the figures are now 775 and 1,010 respectively.

Since the SHLAA post dates the publication of the SCS, we are uncertain as to the reason why such a significant reduction in quantum of housing and extensions to the residential envelope is considered necessary. Presumably it is the 'new' strategy to redevelop existing employment areas within the settlements that has led to this change. Our representations on this strategy and specifically the Eldon Way Industrial Estate are included elsewhere within our representations. Previously we have commented on the Table at paragraph 4.6 of the Submission Core Strategy and the lack of evidence to underpin that table. It seems odd that in the space of a year the expected requirement for Greenfield sites has effectively halved on the basis of a SHLAA exercise. The community is therefore not able to effectively

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comment on the housing land supply and at this stage the Submission Core Strategy is legally unsound.

That said, we are of the view that the quantum of housing envisaged south of Hockley/Hawkwell should be more than the 175 currently envisage. In coming to this view we have reviewed the Urban Capacity Study and the latest housing figures in the Annual Monitoring Report 2008. We conclude that the shortfall in housing land supply is such that 330 dwellings in this location is appropriate.

The recently published SHLAA is based upon the data obtained from the Urban Capacity Study 2007, a call for sites exercise and data from the Annual Monitoring Report 2008.

The 2007 Urban Capacity Study (UCS)

1. 2007 is widely recognised as being the peak level of house prices in the UK and it was acknowledged by Government and practitioners alike that 2007 house prices were at an unsustainable level. It is our view that utilising the 2007 UCS as an evidence base without reference to the market does not pick up the depressed demand that is likely to now exist. Recent corrections to the housing market now mean that housing land prices are at a much lower and arguably more affordable level than before. The implications are that some pdl may not be viable for housing development. Often brownfield sites have much higher development costs than Greenfield sites and so the yield from urban capacity will be much lower than anticipated in the 2007 study. One example is the employment allocation of the Adopted Local Plan located at 76-92 Main Road, Hawkwell. This site has been allocated for several years and has been available during the most recent rises in residential property prices during 2006-07. As a consequence the lack of progress on the site can only be described by its current occupancy and perhaps it comprises high value uses that do not encourage redevelopment. Despite this the site is identified as having high potential for alternative use and high potential demand. The SHLAA form notes that there is no information on legal constraints (e.g., tenancy agreements) As a consequence it is difficult to see how this could continue to be a potential site and as a consequence the allowance for green field releases should be increased.

2. There are considered to be other instances in the UCS and the recently published SHLAA where the assumptions and calculations would indicate that the 1301 urban capacity figure is over optimistic and the SHLAA assessment is limited. In the assessment of 'non-residential sites in appropriate locations' within the UCS assumptions are made as to the probability of sites coming forward for new housing. 68-72 West Street, Rochford is identified as a high probability site but we note that it has been subject to 7 refusals of planning permission/conservation consent. There is a significant gap between the urban capacity identified as being suitable by the Council and the capacity applied for by the owners. Given its alternate use value, it is debateable whether the two capacity figures can be reconciled. No 247 London Road is another example of a site allocated in the Local Plan but which hasn't come forward. This is now the subject of a proposal for a care home and if approved would further limit the scope for market/affordable housing capacity on the site. A striking example of how the urban capacity study has underestimated is also evidence by 2-4 Alderman's Hill, Hockley - described as a disused service station. There has been no residential development application on this site since 2004 and most recent applications have sought commercial use of the site. Rather than being evidence of housing land deliverability, this particular site evidences the need for commercial uses in the area. There are therefore deliverability doubts over these 'high probability' categories which amount to some 40 units.

3. In relation to the assessment in the UCS entitled 'intensification of existing residential uses' we note that the assessment is premised on an assessment of recent trends taking into account net completions between 2001-2006 and 2005-06. This is effectively an assessment of windfall trends and not an approach that PPS3 encourages. Importantly Table 3-12 in the urban capacity study seeks to project forward urban capacity from residential redevelopment - a period that benefited from high house prices and PPG3 guidance encouraging redevelopment. These two circumstances have markedly changed and so the assumptions and conclusions drawn would also have changed. Even taking into account the UCS discounting, the reliability of the 404 units from this source must be questioned and in our view the 1301 figure cannot be a sound basis for urban capacity and further Greenfield releases are necessary.

4. In the section of the UCS entitled 'subdivision of dwellings' and 'living above the shop' it is estimated that recent trends would result in 7 and 15 units. Our concerns with using trends as a basis for urban capacity are detailed above - PPS3 does not encourage this. Rather, local authorities are charged with surveying their areas, identifying which areas may yield urban capacity and how much and developing policies to achieve that. Government guidance does not encourage the estimation of windfalls in the way the UCS does.

5. Redevelopment of established employment land is a separate section within the UCS. At 1 above we identify the low probability of the Main Road residential allocation coming forward. This remaining section of the UCS considers 11 further employment sites which were first identified in the 2000 UCS. Three of these are considered to have a high probability of coming forward. We have looked at these three sites and can find no evidence that they are likely to come forward. In the 8 years between 2000 and 2008 the three identified high probability employment sites have not been developed and there is no reason to assume that the next 5-10 years will be any different. For example the Rawreth Industrial Estate is identified as being well used in the UCS and although it has some unneighbourly uses there is no indication that the site is available, suitable or deliverable for residential. Land between 39-69 Lower Lambricks, Rayleigh is identified as having a high probability of residential uses. Yet there is no

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evidence of any pre-application advice or planning applications for this area. Stambridge Mills, Mill Lane, Stambridge is a further example. This site is separated from the urban area, in a flood risk zone and protected in the 2006 Replacement Local Plan by Policy EB9 which promotes B1 uses. Against this background there is only two relevant planning applications affecting this area both date from the early 1990's and relate to a plant room and loading bay. There is no evidence that this is likely to come forward for residential purposes in the next 5-10 years.

6. In the UCS extant permissions are identified as 856 dwellings. It is important to note that this figure needs to be continually reassessed so that from the point of adoption of the Core Strategy a 5 and 10 year housing land supply is available. The SHLAA notes extant permissions for 2009-14 being 106. As noted below extant permissions do not necessarily translate into deliverable sites. There is therefore a contingency that needs to be built in. Further allocations on greenfield land need to be increased and as such the quantum of housing in the area south of Hockley/Hawkwell should be increased to 330 dwellings in order to begin to meet the shortfall identified.

The District Council's 5 year housing supply assessment

7. The District Council's Annual Monitoring Report ("AMR") 2008 purports to demonstrate a 5 year housing land supply. The preamble to Table 4.10 in the AMR 2008 explains that Rochford District Council ("RDC") has included units under construction, units with full permission, units with outline permission, units with a resolution to grant, units subject to preapplication discussion/Urban Capacity Assessment and land allocations in its trajectory. The reader is referred to Appendix B which breaks down the sites in more detail. The recently published SHLAA also includes a table showing a potential 1273 dwellings deliverable. However, it refers to "appropriate brownfield sites." Since these 'appropriate sites' are do not benefit from an application or a planning permission it is difficult to programme them into the housing delivery trajectory.

8. In the full planning permission category of the AMR 2008 where work has not yet started there can be no guarantee that all these sites will be delivered in the 5 years. This comment relates to the one above in relation to the recently published SHLAA. It is not uncommon for permissions to be obtained to provide a means for valuing a site where the owner has no immediate plans to sell the site or develop housing. Delivery may also be hampered by funding constraints, or site assembly problems (where sites are in an alternative use or relocation constraints). Appendix B of the AMR 2008 does not set out the intentions of the landowner or whether the sites are truly achievable in the 5 year period as per PPS3 requirements. The SHLAA purports to show developer intentions at Appendix C but the assessment by the local authority into the legitimacy of some of the claims is not presented. The evidence base is not as full as it should be to demonstrate the robustness of Table 4.6 of the SCS. It is also unclear the extent to which this table is based on either the UCS 2007, AMR 2008, SHLAA 2009 or a combination of all three. This should be set out clearly.

9. In addition, to the 'non delivery' of a proportion of new homes in the AMR 2008, there is concern at the timings of delivery in that data set, for example, 10 units in 2008-2009 relates to outline planning permissions and it is doubtful whether reserved matters can be turned round quick enough to begin delivering housing in this year period. There could well be examples in that set of data where the delivery of units in the first year of the 5 is unlikely, thus delivery is reduced for that period and pushed back and this process is then compounded throughout the data set up to and beyond year 5. Statistical evidence from the Department of Communities and Local Government ("CLG") reveals that building starts are 43% down on the quarter to March 2009 compared with March 2008. It is not clear whether the recently published SHLAA has taken this into account and unless it does the data in the Table at 4.6 of the SCS cannot be relied upon, particularly given the current recessionary circumstances. In relation to the Table at Paragraph 4.6 a refinement is therefore needed to take into account this effect on phasing.

10. This problem is compounded for other units relied upon where permission has been granted but no start on site has been made; this accounts for a considerable number of sites in 2009-10 period (100 dwellings) which is (year 2 of the 5 year period). A delay in these will require more Greenfield sites to be identified in order to meet the shortfall.

11. Finally we note that the East of England Plan expresses its land supply requirement as a minimum. This strategy is not reflected in the

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Submission version of the Core Strategy policy H2.

12. In summary since neither the UCS nor the Annual Monitoring Report form a SHLAA, reservations are maintained about the degree to which sufficient housing land has been identified.

Policy H3

In the Preferred Options Core Strategy 2008 more locations were identified for housing growth in the post 2021 phase. Whilst it is our view that land south of Hockley/Hawkwell should benefit from a greater number of dwellings than the 175 currently identified (330) in order to make the strategy effective. We are concerned at the significant change in strategy between the Preferred Option Core Strategy and the Submission version, which has significantly less housing growth on green field sites. This change in strategy is so significant that we would question whether it is appropriate in the context of soundness and the consultation processes that have taken place so far.

We also have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with other policies in the SCS and feel that Green Belt review should be more explicit throughout the SCS. As it currently stands there is a potential conflict with national policies and limited justification for the Green belt strategy. We note that in Policy H3, which indicates the need for Green Belt land review, the advice is limited and unclear. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H3 and Policy GB1/H2 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary. Not to do so is unsound for justification and effectiveness reasons.

Policy H4 - Affordable Housing

As currently drafted we feel that the policy is not concise enough and that the policy does not reflect current guidance. The phrase 'at least' would indicate that in most cases affordable housing above 35% will be sought. Our understanding is that the 35% figure is recommended in the SHMA and that to provide a policy framework which seeks to go beyond that figure would potentially be unworkable as many sites could not financially bare the burden of over a third of the net developable area not yielding a value. The policy should be redrafted so that "a target of 35% affordable housing shall be provided on all developments of 15 or more units..."

The last policy paragraph provides some scope to relax this policy, if there are clear site constraints that make on site provision impossible. The policy, though, is not particularly clear on what would constitute exceptional circumstances. For example, physical site constraints, which unusually raise development costs, would be one such reason and this should be specified. There may be other reasons including the nature of housing needs in the part of the District the site is located which justify affordable housing below the 35% target. Design reasons may also have a bearing on how provision is made and in what form, particularly if the site is in an historic area where design might override housing need argument. It is therefore recommended that the policy expand on the type of circumstances where affordable housing may be relaxed and the type of information that will be sought of applicant's who have a need to invoke this part of the policy.

Policy H5

In support of the policy, it is advantageous that no percentages requiring a specific mix are included. This flexibility will enable developers and the Council to respond directly to changing circumstances in the local housing market. In the past some authorities have set out a percentage for the type of housing they require only to find that after a few years of strict implementation there is an oversupply of property of that type and no flexibility in the policy to address the problem.

Policy ED2 - London Southend Airport

It is considered that to grow non aviation related employment at a location north of Southend Airport where sustainable access from the rest of Rochford District requires careful consideration. Most Airports are serviced by aviation related employment development and as such a location close to the airport is sensible and sustainable. However, for surface access reasons it would be inappropriate to encourage travel from Rochford's main settlements to what essentially

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would be a rural location for general employment uses. Whilst sustainable access would be improved by a railway station and better bus links, there is no evidence to suggest that a sustainable surface access strategy for non related employment development at the Airport can be achieved. Paragraph 11.22 explains the critical importance of a railway station to the delivery of the strategy yet the Transport Chapter and Implementation Chapter provide neither a policy nor an assessment of deliverability. It is also notable that the South Essex Rapid Transit Policy T4, as set out at paragraph 10.16, notes that Rochford is not proposed to be served but may be served in future phases. This uncertainty is no way to plan for a major employment land supply strategy in the District. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley/Hawkwell, Rochford and Rayleigh is unsound.

Policy ED3

We fully support the first sentence of the Policy and note the apparent contradiction with the statements in Policy H1 and elsewhere which seeks to develop on alternative uses at industrial estates such as Eldon Way.

This contradiction is evidence in the second paragraph of Policy ED3. In our representations on Policy H1 we have explained why it is not sound to diminish the employment stock at Eldon Way and the importance of maintaining a dominance of employment type uses at this estate. These arguments are not repeated here.

We note the sentiments of the third paragraph and in accordance with our representations elsewhere are of the view that this sentence should be revised to explain that Eldon Way will accommodate principally employment type uses. As noted elsewhere uses which are an alternative to employment would diminish this highly sustainable employment site and this is unsound when assessed against National Policy.

Policy ED4 - Future Employment Allocations

In part, the de-allocation strategy is not supported as it is considered unsound when set against sustainability criteria. In relation to the Eldon Way Industrial Estate it is considered critical to the ongoing sustainability of this settlement that employment uses are maintained at this location. It is close to the railway station, bus routes and local residential areas from which the opportunity exists for employees to walk or cycle to work. Its location adjacent to the Town Centre offers opportunity for some retail and leisure development to complement the centre and to maintain a supporting function. These sustainable benefits would not occur with the deallocation of Eldon Way or the significant erosion of its employment floorspace. Whilst redevelopment of the employment site to achieve new employment is supported, the dominant land use should continue to be employment use. As a consequence, the 18ha of land required for employment in this policy is considered to be excessive and the policy should be reviewed to explain that redevelopment of existing employment sites for primarily new employment development will be encouraged.

Policy T4

It is noted that the South Essex Rapid Transit policy, as elaborated upon at paragraph 10.16 notes that Rochford is not served but may be served in future phases. This uncertainty is contrary to the delivery principles of soundness and directly puts at issue the employment land supply strategy in the District which is founded on sustainable access to new sites. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley, Rochford and Rayleigh is unsound.

Appendix H1, CTL1 - Infrastructure

It is recognised that necessary infrastructure provision is an important part of creating a sustainable development and in that context appendix H1 is supported. The supporting text notes that the table at Appendix H1 is not exhaustive and in that context it is very important that the framework properly distinguishes between what should be provided as part of new development schemes and what shouldn't. It is therefore essential that the framework acknowledges the importance of Circular 05/05 and the tests which say that provision of infrastructure and/or contributions should be:

- * Relevant to planning
- * Necessary to make the proposed development acceptable in planning terms
- * Directly related to the proposed development
- * Fairly and reasonably related in scale and kind to the proposed development
- * Reasonable in all other respects

As is made clear (Paragraph B9 of Circular 5/05) contributions should not be used to make good existing deficiencies in infrastructure provision. Nor are they to be used to secure contributions to the achievement of wider planning objectives that are not necessary for consent to be granted. In that context the Core Strategy should set this out as its policy framework.

Policy GB1 - Green Belt

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The objectives of this policy are supported, although as noted in other representations the SCS is unsound as it does not meet the tests in relation to justification, compliance with national policy or effectiveness of strategy.

Policy GB1 mentions the objective to allocate the minimum amount of Green Belt land necessary. The policy should link to the requirements of PPG2 and RSS which are discussed in relation to the representations on Policy H2 and H3. The policy should set out a timeframe for the review and why Rochford requires a Green Belt review (what the exceptional circumstances are in this District that justify a review of local boundaries. The policy should be amended to set out a 2031 time frame and this may require the SCS to have an extended life span beyond 2021.

We would recommend the deletion of the word character since Green Belt designation is not related to landscape character as currently drafted. For clarity we would also recommend that the Policy or its supporting text explain that a Green Belt review will take place in support of an allocations document (paragraph 6.6) in order to identify an appropriate new boundary. This is particularly necessary given the commitment to a Green belt review in the adopted Local Development Scheme.

Policy CLT1 - Planning Obligations and Standard Charges

In view of the need to test fully the basis on which standard charges are based it is important that any document produced is in a development plan document that enables an examination in public. The policy should explain this in order that when the document is produced it accords with Policy and is based on sound evidence.

ENV9 - Code for Sustainable Homes

Object. The advice from the Department of Communities and Local Government is that the new requirement to have a rating against the Code does not make it mandatory to build a Code home or to have each new home assessed against the Code. It does however mean that all buyers of new homes be given clear information about the sustainability of the new home. A house builder can do this in one of two ways:

- they can choose to build a Code home, have that home assessed against the Code and provide the home buyer with a Code certificate stating the star rating the home has achieved
- or, they can choose to build to current building regulations standards, not to pay for an assessment and instead download a nil-rated certificate of non-assessment (also referred to as a nil-rating) to provide to the home buyer.

As such the Rochford policy requirement that coding 3 be achieved by 2010 and Code 6 by 2013 is out of step with Government advice. The policy wording should explain that it is just the coding that is a requirement of new homes and not necessarily that new homes should be constructed to achieve a standard.

The current Government objectives are for the code to be introduced over a reasonable period with development to be code 3 by 2010, code level 4 by 2013 and code level 5 by 2016. In this regard the policy, as drafted, seeks to achieve code 6 by 2013 and consequently compresses the code requirements into a shorter time scale with the costs associated expected to be subsumed within the housing market through higher prices. This is not a realistic strategy for the delivery of sustainable homes and we consider that the policy should be revised to extend the period of compliance but to also make it more flexible based on local circumstances.

Research undertaken on behalf of the Housing Corporation and English Partnerships, published in February 2007 'A cost review of the code for sustainable homes' reveals that code 6 is unlikely to be unattainable given existing technologies and that achieving code 5 could result in a 12% to 20% increase in costs that would have to be passed onto the consumer. Given the variability of the housing market with peaks and troughs, it is unlikely that the housing market would be able to subsume this level of price increase.

The code system policy as currently drafted does not have regard to site circumstances and so many of the requirements could be difficult to meet. For example, micro electricity generation on site may be difficult to achieve where local circumstances deter the capture of wind or solar power. If more expensive technologies are required to generate power than is the norm then costs will rise. There may be other competing reasons why designs cannot include certain sustainability measures if housing sites are in sensitive landscape and historic locations. Alternatively there may be significant development costs associated with site specific circumstances and so viability of the site's development becomes a valid consideration. By insisting on the code for sustainable homes other policy objectives such as affordable housing at particular rates and other contributions may need to be reconsidered. Consequently, we are of the view that this policy should be drafted in a manner which enables site specific circumstances to be taken into account. As noted above the Government explains that the code is a certification requirement and does not necessarily mean that buildings are constructed in accordance with a code level.

It is also important to note that it is not the purpose of planning legislation to duplicate other legislation. In this regard, the policy should accept that the Building Regulations will be the main vehicle for implementing this policy and that unless the coding requires external development then there will be no need to specify what is to be carried out in a planning application.

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O - 16920 - 10009 - Policy H3 - Extension to residential envelopes post-2021 - i, ii

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Summary: Policy H3

In the Preferred Options Core Strategy 2008 more locations were identified for housing growth in the post 2021 phase. Whilst it is our view that land south of Hockley/Hawkwell should benefit from a greater number of dwellings than the 175 currently identified (330) in order to make the strategy effective. We are concerned at the significant change in strategy between the Preferred Option Core Strategy and the Submission version, which has significantly less housing growth on green field sites. This change in strategy is so significant that we would question whether it is appropriate in the context of soundness and the consultation processes that have taken place so far.

We also have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with other policies in the SCS and feel that Green Belt review should be more explicit throughout the SCS. As it currently stands there is a potential conflict with national policies and limited justification for the Green belt strategy. We note that in Policy H3, which indicates the need for Green Belt land review, the advice is limited and unclear. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H3 and Policy GB1/H2 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary. Not to do so is unsound for justification and effectiveness reasons.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i, ii

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S - 15718 - 8214 - Affordable Housing, 4.29 - None

15718 Support

CHAPTER 4 Affordable Housing, 4.29

Respondent: Miss Debbie Good [8214]

21 Creswick Avenue
Rayleigh
Essex
SS6 9HG

Agent: N/A

Full Text: PPS3 I support the need for Social / Affordable housing within the Rochford District Area but do not support private housing being built by greedy overpaid developers!

Summary: PPS3 I support the need for Social / Affordable housing within the Rochford District Area but do not support private housing being built by greedy overpaid developers!

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

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O - 16614 - 5219 - Affordable Housing, 4.30 - i, ii

16614 Object

CHAPTER 4 Affordable Housing, 4.30

Respondent: Fairview New Homes Ltd [5219]

Fairview New Homes Ltd
50 Lancaster Road
Enfield
Middlesex
EN2 0BY
020 83661271

Agent: Planning Potential (Miss G Brickwood) [7549]

Planning Potential
Palace House
3 Cathedral Street
London
SE1 9DE
0207 357 8000

Full Text: Representations on behalf of Fairview New Homes

1. We are instructed by our client, Fairview New Homes, to submit comments on the published Core Strategy Submission Document. For ease specific reference has been made in accordance with the paragraph and policy numbers as contained in the published document. We would like the opportunity to represent our Client at the forthcoming Examination of the Core Strategy DPD and would be grateful for confirmation that this is possible.

2. Fairview New Homes have an interest in a parcel of land to the South West of Rayleigh Town Centre, as indicated on the attached site location plan. This land was previously identified in the Core Strategy Preferred Options documents to provide an urban extension to the south west of Rayleigh. This option has now been withdrawn in the Core Strategy Submission document and it is on this basis these representations are provided to the Council.

□

3. The Submission Core Strategy has been considered against the requirements set out at Paragraph 4.36 of PPS12 requiring core strategies to be justifiable and effective in order to be found sound, as follows:

Justified:

- i. Founded on a robust and credible evidence base
- ii. The most appropriate strategy when considered against the reasonable alternatives

Effective:

- i. Deliverable - the Core Strategy should show how the vision, objectives and strategy for the area will be delivered and by whom, and when, including who is responsible for implementing different elements of the strategy and when
- ii. Flexible - a strategy is unlikely to be effective if it cannot deal with changing circumstances. Plans should show how they will handle contingencies.
- iii. Able to be monitored - monitoring is essential for an effective strategy and will provide the basis on which the contingency plans within the strategy would be triggered.

4. To summarise our comments, Fairview New Homes strongly object to the Core Strategy as is currently presented on the basis the document is currently unsound for a number of reasons:

â€¢ The lack of robust and credible evidence base

â€¢ Failure to clearly discount reasonable alternatives

â€¢ The effectiveness of the plan is also considered to be flawed and the Council's approach to deliverability and flexibility is questioned.

5. Fundamentally, we question the soundness of the Core Strategy due to the lack of available evidence to support the choices made by the Council. In particular, there is a strong reliance on the findings of the 2009 Strategic Housing Land Availability Assessment (SHLAA) although it is understood this document is not due to be published for consideration alongside the Core Strategy. We, therefore, reserve the right to submit additional comments to the Core Strategy consultation following the publication of the SHLAA.

6. The 2009 SHLAA is clearly listed at Paragraph 1.29 of the submission Core Strategy as one of the evidence base documents the Council have drawn upon when drafting the Core Strategy. The documents listed are all considered to have played an important role in informing the Core Strategy. PPS12 also recognises at Paragraph 4.37 the importance of demonstrating how choices made in the plan are backed up by factual evidence identified in evidence base documents.

7. As a starting point it is important to state it is Fairview New Homes greatest concern there is no background provided within the Core Strategy document, or indeed any of the available evidence base documents, identifying why the Local Planning Authority has chosen to remove some of the sites previously proposed for housing development. In addition, there is also no justification as to why the retained urban extension sites are more suitable than those removed from the draft plan.

8. The following provides specific comments in response to the relevant areas of the Core Strategy.

Housing

9. It is stated at Paragraphs 4.10-4.12 that the Council have adopted a balanced approach when locating new housing

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CHAPTER 4 Affordable Housing, 4.30

between higher tier settlements and lower tier settlements. Although there is no detail provided as to how the Council intend on implementing this balanced approach or how the strategic allocation of housing contributes to the balance required. Our Client cannot support this approach until further detail is understood as to the proportion of housing being allocated to each settlement tier.

10. The proposed distribution of housing development during the plan period does not appear to be proportionately allocated between the various settlement tiers. We would argue that development should be distributed proportionately in line with the size of the settlement in order to benefit for available services and facilities. Rayleigh recognised as having best access to services within the district at Paragraph 2.68 of the Core Strategy. On this basis it is considered the development should primarily be directed to Rayleigh with a proportionate level of housing to the remaining settlements in the District.

Policy H1 - The efficient use of land for housing

11. In general the use of residential extensions to meet the remaining housing requirement that cannot be delivered through the redevelopment of appropriate previously developed land is supported by Fairview New Homes.

12. It is understood there is a need to prioritise use of brownfield land in line with national policy requirements but this needs to be a carefully balanced and realistic approach in identifying appropriate urban extensions to accommodate the majority of the District's housing, as identified in the table at Paragraph 4.6 and later at Paragraph 4.15.

13. Policy H1 sets out that the Council will seek the redevelopment of Rawreth Lane Industrial Estate, Foundry Industrial Estate, Stambridge Mills and Star Lane Industrial Estate. Without sight of the 2009 SHLAA it is not possible to understand whether the Council's choice to release employment land for housing is appropriate and Fairview New Homes cannot, therefore, support this element of Policy H1. This objection is further amplified by the fact additional employment land is required but is yet to be identified.

Policy H2 - Extensions to residential envelopes and phasing

14. The Council's intention to provide a balanced strategy for housing provision is mentioned again at Paragraph 4.18. The comments made at Paragraphs 9 and 10 above are also relevant in this respect.

15. In comparing the Preferred Options Core Strategy Document and Submission Core Strategy Document there is a significant reduction in the number of housing units being provided in urban extensions pre 2015, from 1450 dwellings to 775. From discussions with the Local Planning Authority it is understood the Council are seeking to provide the District's housing requirements by increased development densities. From the evidence available in the Submission Core Strategy and summary of SHLAA sites a number of the sites identified as urban extensions have in fact been allocated a reduced number of dwellings, including the land to the north of London Road, Rayleigh. We would, therefore, consider the approach taken by the Local Planning Authority to provide the required level of housing is untenable and unjustified.

16. In discounting preferred options PPS12 makes clear at Paragraph 4.38 the requirement for Local Planning Authorities to consider and evaluate reasonable alternatives. As set out above, the choices the Council have pursued have not been substantiated and without the consideration of reasonable alternatives the Core Strategy cannot be considered justified and therefore unsound.

17. However, this is our opinion based only on discussions with the Local Planning Authority rather than a thorough evidence base and we will consider the evidence in detail when it become available and provide further comment.

18. Paragraph 4.19 of the draft Core Strategy details the Council's primary factors in determining the location of future urban extensions. It is presumed the Council have assessed each of the proposed urban extension sites against the following criteria and that this information is contained within the SHLAA, although we have not been provided with any evidence of this to assess. It can be demonstrated that the land identified on the attached site location plan meets all of the requirements set out below.

â€¢ The proximity and relationship to existing centres, facilities, services

â€¢ The availability of infrastructure and/or the potential for additional infrastructure to be provided for development in such areas

â€¢ The potential to reduce private car dependency

â€¢ The potential to avoid areas of constraint (such as areas at risk of flooding, sites of ecological importance, public safety zone etc)

â€¢ The historical, agricultural and ecological value of land

â€¢ The impact on highway network (including availability and impact on existing network, as well as potential for improvements to be delivered)

â€¢ The relationship of development locations to the District's area of employment growth

â€¢ The potential to create a defensible Green Belt boundary

â€¢ The avoidance of coalescence with neighbouring settlements

19. In summary, Fairview's land is sustainably located in particularly close proximity to Rayleigh Town Centre and train station. In addition, the location of the land provides a natural extension and rounding of settlement boundary. An extension to Rayleigh in this location offers no opportunity for coalescence with neighbouring settlements nor does it

16614 Object

CHAPTER 4 Affordable Housing, 4.30

constitute urban sprawl.

Policy H2 - Extensions to residential envelopes and phasing

20. Although it is stated a flexible approach to the timings of the release of land will be maintain no explanation is provided as to why some sites are considered suitable for development pre 2015 and others post 2015. Paragraph 4.22 elaborates further to state a number of factors have been considered when determining the phasing of strategic housing sites although this information is not clearly available to assess.

21. As stated above the principle of releasing certain areas of greenbelt land is considered the best approach to meeting the Council's housing provision requirements. However, Fairview New Homes object to the omission of the land to the South West of Rayleigh for housing development as previously identified in the Core Strategy Preferred Options document. The site identified on the attached site location plan has been assessed against the Council's criteria, as set out at Paragraph 18 above and each requirement can be met. Without any clear explanation as to why this site has been discounted and the only other strategic housing site identified in Rayleigh is located further away from Rayleigh Town Centre and the associated services and facilities including the train station, Fairview New Homes object to Policy H2.

22. As considered at the outset of these representations the draft Core Strategy cannot be considered robust, and therefore sound, without clear justification and evidence base.

Policy H3 - Extension to residential envelopes post-2021

23. Policy H3 is supported on the basis that the release of greenbelt land is required for housing and this is the most appropriate approach to meet the Council's housing requirements, as set out at Paragraph 21 above.

24. However, it is unclear why some of the sites previously identified for housing development pre 2015 up until 2021 in the Preferred Options Core Strategy document have now been allocated for development post 2021, such as South East Ashingdon. It is stated at Paragraph 4.24 of the Submission Core Strategy document those areas identified for post 2021 development may not be immediately deliverable. However, there is no information available to understand why these sites are now no longer considered suitable for pre 2015 development as they were in December 2008. As a result, Fairview New Homes consider Policy H3 to be unjustified and therefore unsound.

Affordable Housing

25. The acute need for additional affordable housing is recognised at Paragraph 4.30. It is unclear from the draft Core Strategy document exactly how much affordable housing is required in the District in the plan period.

26. However, taking the starting point as set out at Paragraph 4.30 that the Thames Gateway South Essex Strategic Housing Market Assessment requires 131 net additional affordable dwellings per year which constitutes 52% of the District's overall annual housing target. In order to achieve this target using the Council's proposed policy requirement that new housing developments are to provide 35% affordable housing, 375 new dwellings would need to be developed each year. This calculation does not account for those developments with fewer than 15 dwellings which have no requirement to provide affordable housing or developments which cannot viably afford to provide non-market housing.

27. An annual requirement of 250 dwellings is identified at Paragraph 4.2 of the Core Strategy which would leave a significant short fall of affordable housing and act to compound the current situation. The approach taken by the Council ultimately accepts there will always be a shortfall in affordable housing provision and does not seek to redress this. We do not, therefore, consider this to be a robust or justified approach to achieving affordable housing in the District.

28. It is, therefore, considered in order to meet the District's affordable housing requirement additional housing land should be identified in order to ensure a wholesale increase in housing provision to address the Council's shortfall in affordable housing and meet the targets set for the plan period. The most appropriate and effective method by which to secure affordable housing provision is through developing large sites that are viably able to offer affordable housing units.

29. During the consultation of the submission Core Strategy the Council's Housing Strategy (2009) was not available and we reserve the right to make further comment on this document following the publication of this evidence.

The Green Belt

30. It is fully accepted by the Council that the Green Belt boundary is currently too tightly drawn and the release of some Green Belt land is necessary to meet the District's development requirements. However, it needs to be demonstrated that the areas of Green Belt land to be lost are justified and located in the most appropriate area and that areas of release land do not undermine the principle of the Green Belt.

31. It is understood from Paragraph 6.7 of the Submission Core Strategy the Council will seek to examine the degree to which current Green Belt land is helping to achieve the purposes of the Green Belt when considering reallocating land. However, areas of Green Belt are proposed to be reallocated for urban extensions prior to this research being

Core Strategy Submission Document

O - 16614 - 5219 - Affordable Housing, 4.30 - i, ii

16614 Object

CHAPTER 4 Affordable Housing, 4.30

undertaken.

32. Fairview New Homes fully support the justified retention of the areas of Green Belt where appropriate and the release of Green Belt land where needed. However, at present the proposed Housing policies and Green Belt policies are not coherent and the reallocation of certain areas of Green Belt is not based on a credible evidence base.

Environmental Issues

Policy ENV4 - Sustainable Drainage Systems (SUDS)

33. Fairview New Homes would like to support the flexibility contained within Policy ENV4 which recognises it is not always viably possible to incorporate SUDS in all developments.

Policy ENV8 - On Site Renewable and Low Carbon Energy Generation

34. We would also like to support Policy ENV8 on the same basis as Policy ENV4 in that it is important that the production of energy from renewable or low carbon sources is only required where it is viably possible so as not to result in developments not coming forward.

Transport

Policy T8 - Parking Standards

35. Fairview New Homes object to Policy T8 as it is currently contrary to National Policy requirements as set out in PPG13 which contains maximum parking standards. Indeed, this is recognised at Paragraph 10.27 of the Submission Core Strategy document. Enforcing minimum parking standards is not consistent with local or national sustainability aims and should not be an approach pursued by the Council.

Summary:

Affordable Housing

25. The acute need for additional affordable housing is recognised at Paragraph 4.30. It is unclear from the draft Core Strategy document exactly how much affordable housing is required in the District in the plan period.

26. However, taking the starting point as set out at Paragraph 4.30 that the Thames Gateway South Essex Strategic Housing Market Assessment requires 131 net additional affordable dwellings per year which constitutes 52% of the District's overall annual housing target. In order to achieve this target using the Council's proposed policy requirement that new housing developments are to provide 35% affordable housing, 375 new dwellings would need to be developed each year. This calculation does not account for those developments with fewer than 15 dwellings which have no requirement to provide affordable housing or developments which cannot viably afford to provide non-market housing.

27. An annual requirement of 250 dwellings is identified at Paragraph 4.2 of the Core Strategy which would leave a significant shortfall of affordable housing and act to compound the current situation. The approach taken by the Council ultimately accepts there will always be a shortfall in affordable housing provision and does not seek to redress this. We do not, therefore, consider this to be a robust or justified approach to achieving affordable housing in the District.

28. It is, therefore, considered in order to meet the District's affordable housing requirement additional housing land should be identified in order to ensure a wholesale increase in housing provision to address the Council's shortfall in affordable housing and meet the targets set for the plan period. The most appropriate and effective method by which to secure affordable housing provision is through developing large sites that are viably able to offer affordable housing units.

29. During the consultation of the submission Core Strategy the Council's Housing Strategy (2009) was not available and we reserve the right to make further comment on this document following the publication of this evidence.

Change to Plan

Appear at exam? Yes

Soundness Tests i, ii

Core Strategy Submission Document

S - 16085 - 14149 - Affordable Housing, 4.31 - None

16085 Support

CHAPTER 4 Affordable Housing, 4.31

Respondent: Swan Housing Association (Susan Rydings) [14149] **Agent:** N/A

Swan Housing Association
Group Head Office
Pilgrim House
High Street
Billericay
CM12 9XY
United Kingdom
00277844732

Full Text: Rochford's recent track record on the provision of new affordable housing confirms the need to create more opportunities for the development of affordable housing in the future.

Summary: Rochford's recent track record on the provision of new affordable housing confirms the need to create more opportunities for the development of affordable housing in the future.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16352 - 8267 - Affordable Housing, 4.32 - None

16352 Support

CHAPTER 4 Affordable Housing, 4.32

Respondent: Aber Ltd [8267]

Aber Ltd
C/o Agent

Agent: Colliers CRE (Mr S Chapman) [8266]

Colliers CRE
9 Marylebone Lane
London
W1U 1HL
020 7344 6533

Full Text: In addressing the need for affordable housing the Council has set a target that 35% of all new housing should be affordable. However, this acknowledges that the current market conditions and that it may not be viable to achieve 35% affordable housing on all sites, therefore, this target may be relaxed where it can be demonstrated that this target would undermine the viability of a particular development.

Summary: In addressing the need for affordable housing the Council has set a target that 35% of all new housing should be affordable. However, this acknowledges that the current market conditions and that it may not be viable to achieve 35% affordable housing on all sites, therefore, this target may be relaxed where it can be demonstrated that this target would undermine the viability of a particular development.

Change to Plan N/A

Appear at exam? No **Soundness Tests** N/A

Core Strategy Submission Document

S - 15889 - 14113 - Policy H4 - Affordable Housing - None

15889 Support

CHAPTER 4 Policy H4 - Affordable Housing

Respondent: Sanctuary housing association (Miss Sarah Brind) **Agent:** N/A
[14113]

Sanctuary housing association
Collier House
Mead Lane
Hertford
SG13 7UZ
01992 513441

Full Text: We support the proposal that 35% of developments is a suitable target for provision of affordable under S106.

We also would welcome the inclusion of rural exception sites as an option for affordable housing and the publication of Housing Need Studies where appropriate.

Summary: We support the proposal that 35% of developments is a suitable target for provision of affordable under S106.

We also would welcome the inclusion of rural exception sites as an option for affordable housing and the publication of Housing Need Studies where appropriate.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 15918 - 9936 - Policy H4 - Affordable Housing - i, iii

15918 Object

CHAPTER 4 Policy H4 - Affordable Housing

Respondent: Mr David Grew [9936]

PO Box 2091
Hockley
Essex
SS5 4WR
UK
07740201389

Agent: Mr David Grew [9936]

PO Box 2091
Hockley
Essex
SS5 4WR
UK
07740201389

Full Text: By restricting the provision of affordable housing to sites over 15 units, 35% affordable housing will not be achieved overall. This is contrary to the RSS and therefore unsound and not legally compliant.

Summary: By restricting the provision of affordable housing to sites over 15 units, 35% affordable housing will not be achieved overall. This is contrary to the RSS and therefore unsound and not legally compliant.

Change to Plan The figure should be increased to 40% on sites of 10 units or more which will increase overall provision.

Appear at exam? No

Soundness Tests i, iii

Core Strategy Submission Document

S - 15974 - 13441 - Policy H4 - Affordable Housing - None

15974 Support

CHAPTER 4 Policy H4 - Affordable Housing

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: A comprehensive policy. Clarity may be helped by separating policy text from the supportive text.

Summary: A comprehensive policy. Clarity may be helped by separating policy text from the supportive text.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16004 - 9562 - Policy H4 - Affordable Housing - iii

16004 Object

CHAPTER 4 Policy H4 - Affordable Housing

Respondent: Shelter (Belinda Hoste) [9562]

Agent: N/A

Shelter
50, Fishergate
Norwich
NR3 1SE
England
01603 677730

Full Text: Shelter objects to this Policy for the reason that although paragraph 4.30 recognises and supports the regional requirement for at least 35% of new housing to be affordable this Policy will not achieve this. This is because the Policy only requires 35% of housing to be affordable on developments with 15 or more units. As a result, the lack of any requirement for smaller developments will mean that overall less than 35% of new housing will be affordable. Also, the target needs to take into account those larger developments where for reasons of economic unviability the requirement cannot be met.

Summary: Shelter objects to this Policy for the reason that although paragraph 4.30 recognises and supports the regional requirement for at least 35% of new housing to be affordable this Policy will not achieve this. This is because the Policy only requires 35% of housing to be affordable on developments with 15 or more units. As a result, the lack of any requirement for smaller developments will mean that overall less than 35% of new housing will be affordable. Also, the target needs to take into account those larger developments where for reasons of economic unviability the requirement cannot be met.

Change to Plan Both of the following are required

- (a) an increased target of 40% for those developments with 15 or more units
- (b) a target for developments below 15 units - say 25 or 30%

Appear at exam? No

Soundness Tests iii

Core Strategy Submission Document

S - 16104 - 14107 - Policy H4 - Affordable Housing - None

16104 Support

CHAPTER 4 Policy H4 - Affordable Housing

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: Affordable housing could be better constructed using alternative building methods and efficient use of sustainable materials. The Chamber have concerns that the large proportion of this type of dwelling will not enhance the trade in the district. It is felt that the socio economic structure of the mixture of development is misguided.

Summary: Affordable housing could be better constructed using alternative building methods and efficient use of sustainable materials. The Chamber have concerns that the large proportion of this type of dwelling will not enhance the trade in the district. It is felt that the socio economic structure of the mixture of development is misguided.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16220 - 8650 - Policy H4 - Affordable Housing - i, ii, iii

16220 Object

CHAPTER 4 Policy H4 - Affordable Housing

Respondent: Countryside Properties (Southern) Ltd (Mr Steve Price) [8650] **Agent:** N/A

Countryside Properties (Southern) Ltd
Countryside House
The Drive
Brentwood
Essex
CM13 3AT
01277260000

Full Text: Unsound: (i) not consistent with national policy (ii) not justified: not found on a robust evidence base, and (iii) not effective; not deliverable/flexible.

We are pleased to see that the policy includes the ability for the possible relaxation of the proposed minimum percentage requirements for affordable housing where a viability review/economic viability calculations justifies this. This is particularly pertinent in the current economic climate. Affordable housing is just one of potentially a large range of planning obligation or infrastructure requirements for larger development sites, and the combined cost implications of such requirements need to be taken into account to ensure that a site does not become unviable.

However, national planning policy set out in PPS 3 paragraph 29 requires that local authorities take account of economic viability when setting affordable housing targets in their Local development documents. The target of at least 35% affordable housing for developments of 15 or more units must therefore be based upon/justified by a robust and up-to date local viability appraisal undertaken by the council.

The council do not seem to have undertaken its own Affordable Housing Economic Viability Assessment. It seems that you are relying on the East of England figure which in itself suggests no understanding of viability issues locally, and The Thames Gateway South Essex Strategic Housing market Assessment which is not a viability appraisal document (see paragraph 4.30 of the Core Strategy).

With no viability assessment the policy is unsound and does not comply with the requirements of PPS 3. An Affordable Housing Economic Viability Assessment must be undertaken to inform the appropriate percentage requirement of affordable housing.

Furthermore, the wording on viability in the policy should be objective, and we submit that it should be amended so that subjective wording is deleted.

The following amendments should be made:

â€¢ Delete at the beginning of the policy the words "at least"

â€¢ Delete within the first sentence of the third paragraph the word "highly", and in the same sentence (third line of the paragraph), the word "definitely"

â€¢ Delete the words "rendering the site undeliverable" from the same sentence (4th line of that paragraph)

We also consider that the balance of affordable housing specified as "80% social housing and 20% intermediate" is too high (no shared ownership), but that in any case, should not be specified in this policy. Affordable housing need changes over time. Therefore we suggest that the policy should state that the make up of affordable housing should be determined at the time at which a detailed masterplan or planning application is considered for a site (certainly for larger sites), based on identified affordable housing needs at that time.

We would also comment that the insistence on a minimum level of affordable housing for a site should not be used to hold up delivery of those housing requirements set within the East of England Plan (the importance of delivering RSS housing requirements often seems to get forgotten in debates about affordable housing percentages). Housing delivery is an equally important national issue.

Summary: 1. An Affordable Housing Economic Viability Assessment must be undertaken to inform the appropriate percentage requirement of affordable housing.

2. Wording amendments are suggested

3. We suggest that the policy be re worded regarding the type of affordable housing sought, and should state that the make up of affordable housing will be determined at the time at which a detailed masterplan or planning application is considered for a site (certainly for larger sites), based on identified affordable housing needs at that time.

Change to Plan 1. An Affordable Housing Economic Viability Assessment must be undertaken to inform the appropriate percentage requirement of affordable housing. Once undertaken, the percentage of affordable housing required for developments should be reviewed and amended as appropriate.

2. The following amendments should be made to the wording of the policy:

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

Core Strategy Submission Document

O - 16220 - 8650 - Policy H4 - Affordable Housing - i, ii, iii

16220 Object

CHAPTER 4 Policy H4 - Affordable Housing

â€¢ Delete at the beginning of the policy the words "at least"

â€¢ Delete within the first sentence of the third paragraph the word "highly", and in the same sentence (third line of the paragraph), the word "definitely"

â€¢ Delete the words "rendering the site undeliverable" from the same sentence (4th line of that paragraph)

3. We suggest that the policy be re worded regarding the type of affordable housing sought, and should state that the make up of affordable housing will be determined at the time at which a detailed masterplan or planning application is considered for a site (certainly for larger sites), based on identified affordable housing needs at that time.

Appear at exam? Yes

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 16353 - 8267 - Policy H4 - Affordable Housing - ii

16353 Object

CHAPTER 4 Policy H4 - Affordable Housing

Respondent: Aber Ltd [8267]

Aber Ltd
C/o Agent

Agent: Colliers CRE (Mr S Chapman) [8266]

Colliers CRE
9 Marylebone Lane
London
W1U 1HL
020 7344 6533

Full Text:

It is noted that on qualifying developments the policy seeks that affordable units are 'pepper potted' throughout the development. However, it is recommended that on such developments the affordable housing (both social rented and intermitted tenure) are clustered in groups of 6 to 10 units throughout the development in order to aid with ongoing management and maintenance undertaken by RSL or other body.

With regards the need for affordable housing the Council has set a target that 35% of all new housing should be affordable. Whilst, the policy acknowledges that as a result of the current market conditions, it may not be viable to achieve 35% affordable housing on all sites, therefore, this target may be relaxed where it can be demonstrated that this target would undermine the viability of a particular development; as worded the test to seek a relaxation to the 35% is too restrictive.

Amend second sentence of first paragraph as follows:

....These affordable dwellings shall be tenure-blend and well integrated into the layout of the new residential development and clustered in groups of 6 to 10 units throughout the development in order to aid with on going management and maintenance undertaken by RSL or other body.

Amend first sentence of second paragraph as follows:

The requirement for the provision of affordable housing will only be relaxed in circumstances, where it can be demonstrated, for example, where constraints make the on-site provision impossible, or where it can be demonstrated that the 35% provision will be economically unviable, rendering the site undeliverable...

Summary:

It is noted that on qualifying developments the policy seeks that affordable units are 'pepper potted' throughout the development. However, it is recommended that on such developments the affordable housing (both social rented and intermitted tenure) are clustered in groups of 6 to 10 units throughout the development in order to aid with ongoing management and maintenance undertaken by RSL or other body.

With regards the need for affordable housing the Council has set a target that 35% of all new housing should be affordable. Whilst, the policy acknowledges that as a result of the current market conditions, it may not be viable to achieve 35% affordable housing on all sites, therefore, this target may be relaxed where it can be demonstrated that this target would undermine the viability of a particular development; as worded the test to seek a relaxation to the 35% is too restrictive.

Change to Plan

Amend second sentence of first paragraph as follows:

....These affordable dwellings shall be tenure-blend and well integrated into the layout of the new residential development and clustered in groups of 6 to 10 units throughout the development in order to aid with on going management and maintenance undertaken by RSL or other body.

Amend first sentence of second paragraph as follows:

The requirement for the provision of affordable housing will only be relaxed in circumstances, where it can be demonstrated, for example, where constraints make the on-site provision impossible, or where it can be demonstrated that the 35% provision will be economically unviable, rendering the site undeliverable...

Appear at exam? No

Soundness Tests ii

Core Strategy Submission Document

O - 16460 - 7507 - Policy H4 - Affordable Housing - ii

16460 Object

CHAPTER 4 Policy H4 - Affordable Housing

Respondent: Mr S Welsh [7507]

Hanover Land Trust
35 Castle Road
Rayleigh
Essex
SS6 7QD

Agent: N/A

Full Text: We consider the DPD is potentially unsound depending on the final selection of specific sites or site in South West Hullbridge.

Please see attached statements 1, 2, 3 and 4 evidential statement.

The precise wording should correlate to the proposal of the attached statements, although the issue may be resolved by publication of the allocations development plan document.

Oral participation will depend on whether the proposed site is included in the allocation development plan document for specific sites for future development, if the proposed site is included oral participation will not be required or necessary.

Summary: We consider the DPD is potentially unsound depending on the final selection of specific sites or site in South West Hullbridge.

Please see attached statements 1, 2, 3 and 4 evidential statement.

Change to Plan The precise wording should correlate to the proposal of the attached statements, although the issue may be resolved by publication of the allocations development plan document.

Appear at exam? Yes

Soundness Tests ii

Core Strategy Submission Document

O - 16481 - 8324 - Policy H4 - Affordable Housing - i, ii, iii

16481 Object

CHAPTER 4 Policy H4 - Affordable Housing

Respondent: Mr J Needs & Aston Unit Trust [8324]

C/o Sellwood Planning
Stoughton Cross House
Stoughton Cross
Wedmore
Somerset
BS28 4QP

Agent: Sellwood Planning (Mr R M Sellwood) [5054]

Sellwood Planning
Stoughton Cross House
Stoughton Cross
Wedmore
Somerset
BS28 4QP

Full Text: The policy is unsound in that the 35% affordable housing target does not appear to be supported by an assessment of viability as required by the Blyth Valley BC - v - Persimmon Homes (North East) Ltd (2008) High Court case.

The policy can only be made sound by undertaking a viability assessment of affordable housing levels in the District.

It is considered that our participation at the oral part of the public examination would assist the Inspector for two main reasons

- Sellwood Planning has a detailed knowledge of the Rochford area, appeared at the last Local Plan Inquiry and was a participant at the RSS public examination. This direct knowledge of the local area and the statutory Development Plan may be of assistance to the Inspector

- Sellwood Planning has experience in promoting major schemes through Core Strategies (eg. 7,000 dwellings in Ashford, 5,750 dwellings in Dover, 2,500 dwellings in Horsham and 1,200 dwellings in Newmarket) and the emerging body of evidence of what constitutes a sound Core Strategy and what is unsound. Our experience indicates that, in a number of respects, the submitted Core Strategy is unsound in its present form.

Summary: The policy is unsound in that the 35% affordable housing target does not appear to be supported by an assessment of viability as required by the Blyth Valley BC - v - Persimmon Homes (North East) Ltd (2008) High Court case.

Change to Plan The policy can only be made sound by undertaking a viability assessment of affordable housing levels in the District.

Appear at exam? Yes **Soundness Tests** i, ii, iii

Core Strategy Submission Document

S - 16876 - 8329 - Policy H4 - Affordable Housing - None

16876 Support

CHAPTER 4 Policy H4 - Affordable Housing

Respondent: Swan Hill Homes Limited [8329]

Swan Hill Homes Limited
C/O Agent
Mr P Kneen
Charles Planning

Agent: Charles Planning Associates Ltd (Mr P Kneen) [5040]

Charles Planning Associates Ltd
1644-1645 Parkway
Solent Business Park
Whiteley
Fareham
Hampshire
PO15 7AH
01489 580853

Full Text:

1.0 Instruction and Introduction

1.1 Charles Planning Associates Limited (Chartered Town Planners) is Instructed by Swan Hill Homes Limited (Swan Hill) to prepare and submit representations on their behalf in respect of the Rochford District Local Development Framework: Core Strategy Submission (September 2009) Development Plan Document.

1.2 The comments refer to the relevant sections and policy designations in the Submission document, as appropriate.

1.3 The comments set out in this submission are intended to assist the District Council in taking forward its Local Development Framework. It is our intention to continue to be involved in the LDF preparation process and we look forward to the opportunity to comment further at the Examination to the Core Strategy.

1.4 If you have any queries regarding the content of this submission then please do not hesitate to contact:

Peter Kneen BSc (Hons) MSc MRTPI
Planner

2.0 Housing:

Policy H1 - The Efficient Use of Land for Housing

2.1 Swan Hill recognises the importance of seeking to concentrate new developments mainly in the existing urban areas, on previously developed land where possible, particularly in view of the Government seeking to ensure 60% of all such new developments are on previously development land (PDL).

2.2 However, given the character of the District, and the strategic housing requirement of the East of England Plan, Swan Hill supports the approach that the Council must also make provision for additional development on the edge of existing settlements on greenfield sites, particularly in the most sustainable locations. As such, Swan Hill supports that where feasible, the redevelopment of existing employment sites for residential/employment purposes can make a contribution towards the strategic housing requirement, provided that sufficient additional employment land is brought forward to ensure the stability of employment levels in the District, and to ensure employment growth meets the East of England Plan requirements.

2.3 Swan Hill considers that Policy H1 should include consideration that new extensions to existing settlements have regard to their potential impact on the wider characteristics and openness objectives of the Green Belt.

Policy H2 - Extensions to Residential Envelopes and Phasing

2.4 Swan Hill generally supports the approach taken by the Council in this policy. As set out above, Swan Hill consider the Council's acknowledgment that housing requirements should be met through the allocation of land on the edge of the existing settlements is the most suitable way forward to meeting the Council's strategic housing requirement and complies with the advice in PPS3.

2.5 The need for suitable greenfield urban extensions represents the best way forward for the Council to meet its strategic housing requirement, as set out in the East of England Plan. Swan Hill supports the recognition that the potential supply of alternative previously developed sites is limited, without detrimentally affecting the character of the District, and therefore the best way forward is the use of sustainable greenfield urban extensions to the existing settlements of the District.

2.6 However, Swan Hill consider that a fundamental consideration that the District Council should consider relates to the potential impact of the urban extensions on the Green Belt policy has been somewhat overlooked. The wider sustainability credentials of the settlements of the District should only be one of many key considerations for determining the level of expansion. In view of the proximity of Southend-on-Sea to all the main settlements of the District, and the influence this has on the likely location many people would travel for employment and leisure, sustainability of many of the settlements is not a key overarching factor, and greater weight should be placed on the potential impact on the openness of the Green Belt, as this cannot be remedied if development occurs in the wrong location.

2.7 As such, Swan Hill considers that determining the location of growth for the main settlements should be to identify

Core Strategy Submission Document

S - 16876 - 8329 - Policy H4 - Affordable Housing - None

16876 Support

CHAPTER 4 Policy H4 - Affordable Housing

those locations where the impact on the wider setting of the Green Belt can be minimised. Further justification for those general locations chosen should be identified in Policy H2. In this regard, Swan Hill has serious concerns regarding the removal of Land South West of Great Wakering as a viable option for the growth of the settlement. The development of this area of Great Wakering, in addition to the potential redevelopment of the Star Lane Industrial Estate could provide a more comprehensive development, whilst ensuring that the wider openness of the Green Belt is maintained. Land South West of Great Wakering is significantly better placed to limit the impact on the wider Green Belt than Land West of Great Wakering, and could contribute to the provision of an important amenity and wildlife site for the local community.

2.8 In addition, Swan Hill consider that the Council now has no reserve provision in the event that any of the existing employment sites set out in Policy H1 fail to come forward for development within the envisaged timescale. Further, Land West of Great Wakering has not been identified in the SHLAA as a deliverable site to help meet the strategic housing requirement, contrary to the requirement set out in PPS3.

2.9 As such, Swan Hill would support the provision of suitable sites which could be safeguarded for future development in the likelihood of a shortfall in supply.

Policy H3 - Extensions to Residential Envelopes Post 2021

2.10 As set out above, Swan Hill supports the overall approach the Council has taken towards the provision of sustainable urban extensions as a suitable means of meeting their strategic housing requirement. However, as set out for Policy H2 above, Swan Hill has serious concerns regarding the removal of several proposed sites set out in the October 2008 Preferred Options Core Strategy, without any guarantee of the ability to deliver those sites set out in Policy H1.

2.11 As also considered above, the inclusion of West of Great Wakering for 250 dwellings should not be included ahead of South West of Great Wakering, in view of the fact that the site is not identified in the SHLAA as available, suitable and achievable as required by PPS3, and thus is not supported by a robust and creditable evidence base for its inclusion as a strategic site for development.

2.12 Whilst Swan Hill acknowledge that alterations to Policy H1 has resulted in the removal of some locations for growth in Policy H3 (as set out in the Sustainability Appraisal), Swan Hill does not consider that the most appropriate locations have been chosen.

2.13 In addition to the matters raised above, the use of West of Great Wakering would also result in the loss of valuable agricultural land, which clearly in a Green Belt location, should be less suitable for development than other sites, such as South West of Great Wakering, which would have limited impact on the wider Green Belt policy, and not result in the loss of valuable agricultural land.

2.14 Finally, in respect of Policies H1, H2 and H3, all of the above comments are based on our interpretation of the Submission Version Core Strategy when compared to the October 2008 Version of the Core Strategy. Without the ability to undertake a detailed assessment of the Council's SHLAA, it is not possible to clarify the proposed Core Strategy position regarding the proposed direction of growth proposed for the settlements in the District. As such, Swan Hill reserves the right to make additional representations regarding the proposed Policies H1, H2 and H3 following the publication of the SHLAA in due course.

Policy H4 - Affordable Housing

2.15 In general terms, Swan Hill supports the approach taken by the Council towards the provision of affordable housing for new residential developments. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H5 - Dwelling Types

2.16 Swan Hill supports the policy provision of H5, and considers that the approach taken by the Council for this policy represents a suitably flexible alternative to stipulating percentages of dwelling mix, sought by some local authorities. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H6 - Lifetime Homes

2.17 In regard to this policy, Swan Hill objects to the Council's policy where all new dwellings should be provided to the Lifetime Homes Standard. Whilst it is acknowledged that the UK has an aging population, Swan Hill considers that seeking to provide Lifetime Homes on all sites is considered to be overly onerous for proposed developers, particularly when considering the requirement for all car parking spaces to be suitable for disabled users, which could result in more schemes becoming unviable. Therefore, the provision of a percentage of Lifetime Homes should be considered through negotiations with the Council at the planning application stage, and should be determined on a case-by-case basis.

3.0 Character of Place: Policy CP1 - Design

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3.1 The Town and Country Planning (General Development Procedure) Order 1995 (As Amended) makes the submission of a Design and Access Statement for most types of planning applications a Statutory requirement, and as such, the provision of a Design Brief represents a pre-requisite of all major planning applications.

3.2 Policy CP1 seeks to ensure the provision of good, high quality developments that reflect local characteristics and distinctiveness, this ideology is supported by Swan Hill.

4.0 The Green Belt:
Policy GB1 - Green Belt Protection

4.1 Following the amendments to the wording of the Policy since the October 2008 Preferred Options Core Strategy, Swan Hill is now generally supportive of Policy GB1 and its supporting text. However, as expressed above, it is important that where alterations to the Green Belt boundary occur as a result of the extension of the settlements to meet the strategic housing requirement, both the minimal amount of land is taken and where that land is taken for development, it represents the best available land which has a minimal impact of the wider openness characteristic of the Green Belt.

5.0 Environmental Issues:
Policy ENV3 - Flood Risk

5.1 Swan Hill generally supports the approach set out in Policy ENV3 regarding ensuring development accords with the sequential test of PPS25. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV4 - Sustainable Drainage Systems (SUDS)

5.2 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV4. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV8 - On-site Renewable and Low Carbon Energy Generation

5.3 Whilst Swan Hill recognises the importance of reducing carbon emissions, particularly in new housing developments, and the role this can play in reducing the nations overall Greenhouse emissions. As such Swan Hill is generally supportive of Policy ENV8. It is noted that Policy ENG1 of the East of England Plan sets out a threshold of developments comprising 10 or more dwellings. Swan Hill consider it important for the District Council to justify the reduction in the threshold level.

5.4 Further, no assessment of Policy ENV8 has been set out in the Sustainability Appraisal which justifies the change in threshold from that of Policy ENG1 of the RSS.

Policy ENV9 - Code for Sustainable Homes

5.5 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV9. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

6.0 Community Infrastructure, Leisure and Tourism:
Policy CLT1 - Planning Obligations and Standard Charges

6.1 Swan Hill generally supports the overall approach the Council has taken in Policy CLT1. It is considered Policy CLT1 sets out a degree of flexibility to ensure that all sites are considered on a site-by-site basis, assessing the individual merits of each planning application, in order to ensure the levels of contributions applicable meet the five tests of Circular 05/05. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policies CLT5 - Open Space;
CLT7 - Play Space;
CLT8 - Youth Facilities; and,
CLT10 - Playing Pitches

6.2 Swan Hill supports the need for new residential developments to incorporate a degree of new publicly accessible open space, children's play space, youth facilities and playing pitches, and as such, generally supports the policy approaches taken by the Council.

6.3 However, it is important that whilst the Council may seek to undertake an assessment of providing standard charges for new development, which, as set out in Policy CLT1, this should be based on thorough public consultation and consideration and sound justification. Swan Hill consider that within the provision of a standard charge, it is important that such provision allows for a degree of flexibility to ensure that each site is assessed individually and on its own merits. This is particularly important for those sites close to existing open spaces and facilities. As such, the levels of

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S - 16876 - 8329 - Policy H4 - Affordable Housing - None

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open space and recreation facilities required in the 'standard charge' should be based on an up-to-date PPG17 Open Space assessment, which should be used to form a key consideration in the levels of provision likely to be required in the standard charge system proposed.

7.0 Transport: Policy T1 - Highways

7.1 Swan Hill supports the overall objectives set out in Policy T1 requiring developments to be located and designed to reduce the reliance on the private car and to meet the infrastructure needs generated by development or seek to help achieve these needs is acceptable in principle.

7.2 Swan Hill recognises the importance of providing sufficient infrastructure provision to meet the requirements of development, and that where developments have insufficient consideration of impact on existing infrastructure, they should be considered unacceptable and contrary to National policy guidance. However, Swan Hill considers it important to emphasise that the developer's role should not be seen as a means to meet existing shortfalls in provision.

Policy T3 - Public Transport

7.3 Swan Hill is generally supportive of the policy approach set out in T3, however, as set out in paragraph 7.2 above, it is important that the District Council do not consider that it is the developer's responsibility to resolve existing shortfalls in provision of public transport, and any contribution towards additional public transportation provision should only be to mitigate against the additional level of demand likely from the development proposed.

Policy T5 - Cycling and Walking

7.4 Swan Hill supports the general approach to this policy, as Swan Hill recognises the importance of promoting the use of alternatives to the private car. The policy provision acknowledges the need to ensure relevant contributions in the event of additional travel demands generated by individual developments, whilst also setting out additional aspirations for the cycle network in the District.

7.5 As such, Swan Hill considers this policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy T8 - Parking Standards

7.6 The Council has recently (January 2007) adopted SPD on the requirements for parking standards, and as such, Swan Hill generally supports the policy approach chosen by the Council. As set out in the SPD, whilst Swan Hill generally supports the approach taken by the District Council towards setting residential parking standards, in that the Council has recognised that in the suburban areas, even with some access to public transport, the majority of residents will rely on the use of private cars. However, Swan Hill has concerns over the failure of the District Council to comply with the provisions of PPG13: Transport (2001) which sets out that Local Planning Authorities should not set minimum standards for car parking. Whilst it is acknowledged that PPS3 sets out provision for the consideration of local circumstances, it is considered that the Council has not justified this deviation from PPG13's maximum standard.

7.7 Whilst it is acknowledged that such justification may become apparent through the work currently being undertaken by Essex County Council, until such time, the District Council should only seek to apply the maximum standards indicated in PPG13. However, Swan Hill recommends that the District Council make provisions in the wording of the Policy to allow for changes in the event that future policy on car parking standards need to reflect the County standard, following the completion of the County Council review.

8.0 Economic Development: Policies ED3 - Existing Employment Land ED4 - Future Employment Allocations

8.1 In respect of Policies ED3 and ED4, Swan Hill notes that they have changed considerably since the October 2008 Preferred Options document, in that they are site specific regarding the location of the proposed redevelopment of existing employment sites. These four sites are also identified in Policy H1 - Efficient Use of Land, and in general, Swan Hill supports the approach to the redevelopment of these sites (where feasible) based on the assessments of the sites set out in this version of the Core Strategy.

8.2 However, Swan Hill has concerns that these policies might not be considered suitably sound given that insufficient opportunity has been allocated for consultation on their redevelopment. Without the SHLAA being publically available prior to the consultation on this Core Strategy, an insufficient evidence base has been provided to corroborate that these sites are neither suitable or deliverable to meet the test of soundness requirements.

Summary:

Policy H4 - Affordable Housing

2.15 In general terms, Swan Hill supports the approach taken by the Council towards the provision of affordable housing for new residential developments. The Policy accords with the advice of National Policy and is therefore

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considered sound by Swan Hill.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

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O - 16921 - 10009 - Policy H4 - Affordable Housing - ii

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Full Text: Local Development Framework

Representations on the Core Strategy
Submission Document, November 2009
On behalf of Barratts Eastern Counties

Introduction

The requirements of Core Strategies are enshrined in the 2004 Planning and Compensation Act, the Town & Country Planning (Local Development) England (Regulations) 2004 and the 2008 policy guidance in PPS12. The requirements of Coe Strategies are clear. And they are legal requirements. The Core Strategy must comply with the Local Development Scheme, Statement of Community Involvement and the Regulations. The Core Strategy must be subject to a sustainability appraisal, have regard to national guidance, conform generally with the Regional Spatial Strategy and have regard to any Sustainable Community Strategy. A Core strategy must be sound - justified, effective and consistent with national policy. The following representations therefore focus on these legal requirements.

HOUSING

Paragraph 4.6 - Evidence Base

To meet the soundness test Submission Core Strategies (SCS) must be justified, that is to say it must be founded on robust and credible evidence base and comprise the most appropriate strategy when considered against reasonable alternatives. The housing strategy in as far as it identifies a need for Green belt sites is sound, however, there are other elements which are unsound.

Paragraph 4.6 notes that the Strategic Housing Land Availability Assessment (SHLAA) has examined the supply of housing. It is presumed that the Table at paragraph 4.6 is the outcome of this examination. Whilst the SHLAA has some legitimacy in that it identifies various sites that are apparently available, we are concerned that because the SHLAA was only published in November 2009 it post dates the SCS. This implies that the SCS is driving the SHLAA exercise rather than the other way round. Whilst this may have no real practical effect on the outcome of the SCS and the identified need for Green Belt sites, the Inspector will be mindful of the advice in paragraphs 33 and 54 of PPS3 that SCS draw on the evidence in SHLAA. It may be that the SCS should explain how the evidence base has been used to justify the strategy.

PPS12 explains at paragraph 4.37 that Core Strategies are based on thorough evidence. Since the SHLAA has only recently been published it is considered that the SCS is unsound as it is not justifiable. This, together with other comments on the SCS, indicates that the process should be delayed to ensure that a more robust document is placed in front of the EiP Inspector.

Table at Paragraph 4.6 - Evidence base

From our review of the available evidence it would appear that the housing land supply is insufficient and that Green Belt release are required. From the wider strategy being promoted we note that some of the sites that the District Council consider to be 'appropriate' are likely to relate to existing employment areas. As set out elsewhere in our representations, we maintain severe reservations that the redevelopment of existing employment sites for alternative uses and particularly the Eldon Way Industrial Estate is unsustainable. We will make reference to the effectiveness of this strategy in relation to sustainability, whether it is justified in the context of National Policy and the deliverability of such a strategy elsewhere.

In particular, paragraph 11.32 of the SCS refers to existing employment land and sites within the UCS. It does not refer the SHLAA and as such it appears that an evidence base to support the re-use of employment land for residential is not reported in the SCS.

Having reviewed the 2008 Annual Monitoring Report, as we did when commenting on the 2008 Preferred Options Core Strategy, we maintain severe doubts as to the appropriateness of some of the previously developed sites identified as potential housing sites and their expected housing yield. Whilst we cannot at this stage ascertain whether the SHLAA

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CHAPTER 4 Policy H4 - Affordable Housing

sites referred to in this table correlate with the Annual Monitoring Report and indeed the 2007 Urban Capacity Study, it is our view that there will be some commonality and so the reliance on these sites is likely to be at odds with Government Policy. We shall elaborate on this objection in relation to the specific housing policy below.

We note that the last two rows in the Table at paragraph 4.6 set out figures with and without Green Belt releases. The text to this section of the Core Strategy should, for reasons of clarity, explain that Green belt review will be necessary in order to deliver the required housing.

Paragraph 4.9

The table on page 40, which sets out the settlement tiers, is supported. Rayleigh, Rochford/Ashingdon, Hockley/Hawkwell are clearly the largest settlements in the District and they benefit from good employment, housing, leisure, community and public transport provision. These settlements are the most sustainable ones with the greatest mix of uses. Consequently, it is sensible that the Core Strategy identifies these as top tier settlements and is able to target them with growth accordingly. This component of the strategy is justified by reference to sustainability data and is effective, since targeting development at these locations will ensure a more sustainable pattern of development.

Paragraph 4.14

We maintain that the strategy for redeveloping the Eldon Way Industrial Estate for housing and other alternative uses to employment is unsound. It is neither justified nor effective. The Industrial Land Availability Study 2006 sets out on page 7 strategic objectives. The 3rd objective seeks to Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive. Clearly the strategy as currently drafted envisages major changes to existing industrial estates, including alternative uses. This strategy is not consistent with other strategies and evidence based studies and so cannot be justified in the context of the tests set out in PPS12. It is also an ineffective strategy since the new employment locations that would free up the Eldon Way site for redevelopment relies on transport infrastructure that has no certainty of being delivered. Principally, the erosion of employment uses at Eldon Way could make the settlement of Hockley/Hawkwell less sustainable and thus conflict with the tiered approach on page 40, paragraph 4.9.

Policy H1

Prioritising the use of previously developed land ("pdl") is supported in principle. It is a justified strategy in the context of PPS3 and effective as sequential choices can be made by implementing the policy. However, the District Council is also promoting a strategy which seeks the redevelopment of existing employment locations to alternative uses and by consequence is identifying green field sites for new employment development elsewhere (Policy ED4 refers). This 'land swapping' is not considered consistent with PPS3, nor is it considered to be justified or effective in delivering the desired strategy. This is particularly the case as most of the existing employment sites are occupied and therefore unavailable for redevelopment. In addition, the new Greenfield sites are in an arguably less sustainable locations away from the top tier settlements identified on page 40 of the Submission Core Strategy. Clearly this element of the strategy is inconsistent with the wider strategy.

The Industrial Land Availability Study 2006 is included as an evidence base by the District Council. It includes an introductory section, which explains that the authority wishes to make Rochford the place of choice for new business. It includes several strategic objectives on page 7 including "Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive." It reviews existing employment areas and identifies vacant land, including land available from allocations. It does not include any assessment of new sites or potential opportunities for new sites that might have been expected to feed into the Core Strategy. The strategy for identifying Green Belt site employment allocation does not appear to be based on any evidence in this document and in that context cannot be justified. The strategy being promoted potentially conflicts with Government policy in PPG13, PPG2 and emerging PPS4.

The Employment Land Study 2008 is a much later document. It has a key recommendation on page ii "we recommend that Rochford District Council adopts strong policies to protect existing employment land." Furthermore under recommendations for existing sites on page iii-iv of that document it states "In our view, Hockley Trading Centre is a strategically well placed employment location. However, we recognise the ambitions of the Hockley Town Centre masterplan and that within this the Council should consider it to be allocated for other uses. However, we recommend that this reallocation happen only if provision is made within the masterplan for office use within Hockley Town Centre as part of a mixed use scheme." The view of the writers of this document is clear - the Eldon Way Industrial estate (Hockley Trading Centre) is a good employment site and that it is for other reasons that alternative uses are being considered and only then if office development is supported. This supports our representations that new future uses at the Eldon Way site should be employment dominated and that alternative uses should relate to the objectives of the Town Centre which is to enhance the shopping and leisure facilities. Residential is not an appropriate alternative.

This document recommends the use of land to the west of Rayleigh for employment and envisages Green belt release. However, the SCS does not explain through the evidence base why existing employment sites should be 'deallocated' and Green belt land unnecessarily used.

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CHAPTER 4 Policy H4 - Affordable Housing

In addition to these key issues we have some specific concerns. As a consequence we maintain an objection to the second paragraph of Policy H1. This policy states that the Council will seek the redevelopment of various industrial estates including Eldon Way. The Policy says that alternative uses will be sought (presumably alternative to the existing employment offer) and that new land will be allocated elsewhere. This policy statement, in relation to Eldon Way in particular, is unsound for a number of reasons:

The emerging Hockley Area Action Plan consulted upon in 2008 states that the Eldon Way Industrial Estate is strategically well placed. In a sense this statement underplays the true importance of this highly sustainable employment location and only major employment area in Hockley/Hawkwell. The employment area is adjacent to the railway station and located a short distance from the main bus routes that run along Spa Road. Some of the residential areas of the town are also within walking distance of this commercial area, thus providing a potential for sustainable travel by employees. The Eldon Way Industrial Estate is therefore right at the heart of the settlement of Hockley/Hawkwell and provides an opportunity to meet sustainable transport objectives by reducing the need to travel by car. Consequently, this employment area should be highlighted as a premier employment site in sustainability terms, both in the context of PPG13, PPG4 and PPS6. To encourage alternative uses as set out in Policy H1 implies the removal of the majority of employment based activity at Hockley/Hawkwell and this would be contrary to National policy, would not be the most appropriate strategy when considered against alternatives and is therefore unsound.

Whilst it is acknowledged that improvement to the Eldon Way Industrial Estate can and should take place, the extent to which the mix of employment uses should be altered in favour of alternative land uses requires careful consideration. It is our view that a mix of existing or indeed new employment land uses with some Town Centre type uses should dominate the Eldon Way site. A mix of employment types between offices, light industry and other high technology industries should be encouraged as this will provide many locational advantages to the firms that agglomerate together. The Council says that the existing uses on this site are harmful to amenity. However, the site has operated for many years without any significant issues and if renewal for B1 type uses are encouraged then the employment area can be maintained without harm to amenity. Renewal of the employment stock can help develop and improve trade, improve the sustainability of businesses as a whole and make for a more flexible labour market as skill levels are varied. A singularly different use altogether or a variety of uses which excludes employment could undermine the long term sustainability of the area and Town Centre. As such Policy H1 is not an effective strategy and should be amended to acknowledge the importance of Eldon Way and the need to renew the employment stock to ensure that the site maintains its important role as a employment site, albeit with some ancillary alternative use development where appropriate.

The 2008 Retail Study notes that Hockley Town Centre is not strong and there is trade leakage. Eldon Way Industrial Estate provides a customer base for existing town centre uses. Weekday spending within town centres is an important contributor to the viability of many retail and leisure businesses either through expenditure by employees during the lunchtime trade or expenditure by employers, on necessary goods and services. This relationship helps sustain the critical mass of a centre and provides a platform for new retail and leisure growth. It is important to have a balanced centre with a variety of uses. Policy H1, as currently drafted, implies the removal of employment related development and this is likely to harm the vitality and viability of Hockley Town Centre. The Council has presented no evidence to suggest that this is not the case. Importantly, the 2008 Retail Study explains that there is a need for additional retail and office space. In principle we would support additional office and other B1 type uses plus retail but employment uses should always dominate for the sustainability reasons given above. Retail and office development are likely to present a viable alternative to some of the more industrial type uses.

Consequently, we do not support the phrasing of the third paragraph of Policy H1 and maintain that the most appropriate strategy is to seek renewal of the employment stock with employment based uses and with some new retail development. Removal of employment land uses completely as currently implied-which was the approach adopted in the emerging Hockley Area Action Plan - is not a justifiable strategy.

One of the key tests of a Core Strategy is consistency between policies in the emerging Plan and this strikes at the heart of demonstrating an effective strategy. Policy H1 implies alternative uses to employment and the relocation of Eldon Way to a site identified under Policy ED4. However, Policy RTC6 sets out a suite of policy criteria for Hockley Town Centre which includes employment and commercial activities. In addition Policy ED3 seeks the protection of sustainable employment sites (Eldon Way) and notes that some reallocation of existing employment sites will include a proportion of employment. It notes that in the case of Eldon Way employment development will form a component. The policies appear at odds with one another. The third paragraph of Policy H1 should be deleted as the second paragraph is sufficient to set a strategic context for delivering new housing development. The employment policies and Hockley specific policies should be left to consider the type and quantum of land uses appropriate in the area. If the third paragraph of H1 is to be retained then it should tie in more with Policy RTC6 and in our view explain that employment uses should dominate any redevelopment proposals for the Eldon Way site and that retail and leisure uses should be a supporting proportion.

Implementation, Monitoring and Delivery - page 132 onwards

One of the key tests of soundness is that the Core Strategy should be effective - it should be able to deliver its strategy. The Implementation strategy set out at page 132 onwards of the Core Strategy does not explain how Policy H1, RTC6 and the strategy for redeveloping Eldon Way (Policy ED2 and ED3) will be delivered. The comment at Policy ED3 on

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page 161 identifies it as a potential risk and alludes to land assembly difficulties and the choices to be made by owner/occupiers. In order to deliver the strategy there should be a clear understanding as to whether the new land use values being promoted are sufficient to encourage relocation voluntarily. Secondly there is a need for more information to be gathered and presented to show that current occupiers and landowners are willing to relocate and the timescales likely for this. For example, do the building lease contracts enable early review or are there any break out clauses. There should be some commentary on whether the Council will engage in compulsory purchase orders to pursue their strategy should the 'encouragement' route fail. As currently drafted there is no clear path to deliver the strategy and the danger is that despite reallocation, the sites identified for redevelopment will not come forward in the plan period. In this regard, evidence to satisfy the test of soundness is not provided.

Policy H2 - General Locations

We support the strategy that new housing growth should be targeted at land South of Hawkwell. This area is suitably located to the urban area of Hockley/Hawkwell and to tie in with the settlement tiers on page 40 of the Submission Core Strategy the same terminology for settlement should be used. This ensures a consistency within the SCS. The choice of this location as a housing growth area is appropriate as it would not contribute to the coalescence of the urban area with Ashingdon (there is existing development between this identified housing area at Rectory Road and Ashingdon and moreover, Rectory Road can form a natural physical boundary for the new Green belt boundary. This area is also well located to the existing road network. Cherry Orchard Way has recently been improved and provides much better accessibility to the proposed housing growth area than any other location around Hockley/Hawkwell. The existing bus routes along Rectory Road also make this location sustainable and the additional housing proposed will help underpin the financial viability of bus routes in this area. Locally there are employment opportunities, including the small commercial estate off Main Road. The Eldon Way Industrial Estate adjacent to the Town Centre also provides the opportunity for employment locally. Extensive public open space, play pitches and built leisure facilities are located just to the north of this area and a community hall is located off Briar Close, nearby. The area to the south of Hockley/Hawkwell is close to local shops on the corner of Heycroft Road and Main Road and there are numerous footpath links between this area and the local community including links via Thorpe Road, Thorpe Close, Briar Close, Hawkwell Park and Park Gardens. The area therefore provides the opportunity to enhance existing links, including cycle links, and contribute towards community integration - more so than other sites on the south side of this settlement. The site is also in the control of one house builder and deliverable.

However, we find that the Policy is not fully consistent with national policy and furthermore needs to be reviewed in order to be justified and effective. We have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with this policy and feel that Green Belt review should be more explicit throughout the SCS. We note that it is only Policy H3 which indicates the need for Green Belt land review. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H2 and certainly Policy H3 and Policy GB1 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary.

Policy H2 - Phasing and Quantum

The 2008 Preferred Core Strategy document indicated that the area south of Hawkwell should deliver 330 dwellings over a phasing period to post 2021 (see Policy H2 and H3 of that document). The SCS reduces the quantum of housing in this area to 175 but expects delivery by 2015. At a broader level the Preferred Options Core Strategy of 2008, (Policy H2) required 1,450 dwellings to 2015 and a further 1,050 by 2021. In the SCS the figures are now 775 and 1,010 respectively.

Since the SHLAA post dates the publication of the SCS, we are uncertain as to the reason why such a significant reduction in quantum of housing and extensions to the residential envelope is considered necessary. Presumably it is the 'new' strategy to redevelop existing employment areas within the settlements that has led to this change. Our representations on this strategy and specifically the Eldon Way Industrial Estate are included elsewhere within our representations. Previously we have commented on the Table at paragraph 4.6 of the Submission Core Strategy and the lack of evidence to underpin that table. It seems odd that in the space of a year the expected requirement for Greenfield sites has effectively halved on the basis of a SHLAA exercise. The community is therefore not able to effectively

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comment on the housing land supply and at this stage the Submission Core Strategy is legally unsound.

That said, we are of the view that the quantum of housing envisaged south of Hockley/Hawkwell should be more than the 175 currently envisage. In coming to this view we have reviewed the Urban Capacity Study and the latest housing figures in the Annual Monitoring Report 2008. We conclude that the shortfall in housing land supply is such that 330 dwellings in this location is appropriate.

The recently published SHLAA is based upon the data obtained from the Urban Capacity Study 2007, a call for sites exercise and data from the Annual Monitoring Report 2008.

The 2007 Urban Capacity Study (UCS)

1. 2007 is widely recognised as being the peak level of house prices in the UK and it was acknowledged by Government and practitioners alike that 2007 house prices were at an unsustainable level. It is our view that utilising the 2007 UCS as an evidence base without reference to the market does not pick up the depressed demand that is likely to now exist. Recent corrections to the housing market now mean that housing land prices are at a much lower and arguably more affordable level than before. The implications are that some pdl may not be viable for housing development. Often brownfield sites have much higher development costs than Greenfield sites and so the yield from urban capacity will be much lower than anticipated in the 2007 study. One example is the employment allocation of the Adopted Local Plan located at 76-92 Main Road, Hawkwell. This site has been allocated for several years and has been available during the most recent rises in residential property prices during 2006-07. As a consequence the lack of progress on the site can only be described by its current occupancy and perhaps it comprises high value uses that do not encourage redevelopment. Despite this the site is identified as having high potential for alternative use and high potential demand. The SHLAA form notes that there is no information on legal constraints (e.g., tenancy agreements) As a consequence it is difficult to see how this could continue to be a potential site and as a consequence the allowance for green field releases should be increased.

2. There are considered to be other instances in the UCS and the recently published SHLAA where the assumptions and calculations would indicate that the 1301 urban capacity figure is over optimistic and the SHLAA assessment is limited. In the assessment of 'non-residential sites in appropriate locations' within the UCS assumptions are made as to the probability of sites coming forward for new housing. 68-72 West Street, Rochford is identified as a high probability site but we note that it has been subject to 7 refusals of planning permission/conservation consent. There is a significant gap between the urban capacity identified as being suitable by the Council and the capacity applied for by the owners. Given its alternate use value, it is debateable whether the two capacity figures can be reconciled. No 247 London Road is another example of a site allocated in the Local Plan but which hasn't come forward. This is now the subject of a proposal for a care home and if approved would further limit the scope for market/affordable housing capacity on the site. A striking example of how the urban capacity study has underestimated is also evidence by 2-4 Alderman's Hill, Hockley - described as a disused service station. There has been no residential development application on this site since 2004 and most recent applications have sought commercial use of the site. Rather than being evidence of housing land deliverability, this particular site evidences the need for commercial uses in the area. There are therefore deliverability doubts over these 'high probability' categories which amount to some 40 units.

3. In relation to the assessment in the UCS entitled 'intensification of existing residential uses' we note that the assessment is premised on an assessment of recent trends taking into account net completions between 2001-2006 and 2005-06. This is effectively an assessment of windfall trends and not an approach that PPS3 encourages. Importantly Table 3-12 in the urban capacity study seeks to project forward urban capacity from residential redevelopment - a period that benefited from high house prices and PPG3 guidance encouraging redevelopment. These two circumstances have markedly changed and so the assumptions and conclusions drawn would also have changed. Even taking into account the UCS discounting, the reliability of the 404 units from this source must be questioned and in our view the 1301 figure cannot be a sound basis for urban capacity and further Greenfield releases are necessary.

4. In the section of the UCS entitled 'subdivision of dwellings' and 'living above the shop' it is estimated that recent trends would result in 7 and 15 units. Our concerns with using trends as a basis for urban capacity are detailed above - PPS3 does not encourage this. Rather, local authorities are charged with surveying their areas, identifying which areas may yield urban capacity and how much and developing policies to achieve that. Government guidance does not encourage the estimation of windfalls in the way the UCS does.

5. Redevelopment of established employment land is a separate section within the UCS. At 1 above we identify the low probability of the Main Road residential allocation coming forward. This remaining section of the UCS considers 11 further employment sites which were first identified in the 2000 UCS. Three of these are considered to have a high probability of coming forward. We have looked at these three sites and can find no evidence that they are likely to come forward. In the 8 years between 2000 and 2008 the three identified high probability employment sites have not been developed and there is no reason to assume that the next 5-10 years will be any different. For example the Rawreth Industrial Estate is identified as being well used in the UCS and although it has some unneighbourly uses there is no indication that the site is available, suitable or deliverable for residential. Land between 39-69 Lower Lambricks, Rayleigh is identified as having a high probability of residential uses. Yet there is no

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evidence of any pre-application advice or planning applications for this area. Stambridge Mills, Mill Lane, Stambridge is a further example. This site is separated from the urban area, in a flood risk zone and protected in the 2006 Replacement Local Plan by Policy EB9 which promotes B1 uses. Against this background there is only two relevant planning applications affecting this area both date from the early 1990's and relate to a plant room and loading bay. There is no evidence that this is likely to come forward for residential purposes in the next 5-10 years.

6. In the UCS extant permissions are identified as 856 dwellings. It is important to note that this figure needs to be continually reassessed so that from the point of adoption of the Core Strategy a 5 and 10 year housing land supply is available. The SHLAA notes extant permissions for 2009-14 being 106. As noted below extant permissions do not necessarily translate into deliverable sites. There is therefore a contingency that needs to be built in. Further allocations on greenfield land need to be increased and as such the quantum of housing in the area south of Hockley/Hawkwell should be increased to 330 dwellings in order to begin to meet the shortfall identified.

The District Council's 5 year housing supply assessment

7. The District Council's Annual Monitoring Report ("AMR") 2008 purports to demonstrate a 5 year housing land supply. The preamble to Table 4.10 in the AMR 2008 explains that Rochford District Council ("RDC") has included units under construction, units with full permission, units with outline permission, units with a resolution to grant, units subject to preapplication discussion/Urban Capacity Assessment and land allocations in its trajectory. The reader is referred to Appendix B which breaks down the sites in more detail. The recently published SHLAA also includes a table showing a potential 1273 dwellings deliverable. However, it refers to "appropriate brownfield sites." Since these 'appropriate sites' are do not benefit from an application or a planning permission it is difficult to programme them into the housing delivery trajectory.

8. In the full planning permission category of the AMR 2008 where work has not yet started there can be no guarantee that all these sites will be delivered in the 5 years. This comment relates to the one above in relation to the recently published SHLAA. It is not uncommon for permissions to be obtained to provide a means for valuing a site where the owner has no immediate plans to sell the site or develop housing. Delivery may also be hampered by funding constraints, or site assembly problems (where sites are in an alternative use or relocation constraints). Appendix B of the AMR 2008 does not set out the intentions of the landowner or whether the sites are truly achievable in the 5 year period as per PPS3 requirements. The SHLAA purports to show developer intentions at Appendix C but the assessment by the local authority into the legitimacy of some of the claims is not presented. The evidence base is not as full as it should be to demonstrate the robustness of Table 4.6 of the SCS. It is also unclear the extent to which this table is based on either the UCS 2007, AMR 2008, SHLAA 2009 or a combination of all three. This should be set out clearly.

9. In addition, to the 'non delivery' of a proportion of new homes in the AMR 2008, there is concern at the timings of delivery in that data set, for example, 10 units in 2008-2009 relates to outline planning permissions and it is doubtful whether reserved matters can be turned round quick enough to begin delivering housing in this year period. There could well be examples in that set of data where the delivery of units in the first year of the 5 is unlikely, thus delivery is reduced for that period and pushed back and this process is then compounded throughout the data set up to and beyond year 5. Statistical evidence from the Department of Communities and Local Government ("CLG") reveals that building starts are 43% down on the quarter to March 2009 compared with March 2008. It is not clear whether the recently published SHLAA has taken this into account and unless it does the data in the Table at 4.6 of the SCS cannot be relied upon, particularly given the current recessionary circumstances. In relation to the Table at Paragraph 4.6 a refinement is therefore needed to take into account this effect on phasing.

10. This problem is compounded for other units relied upon where permission has been granted but no start on site has been made; this accounts for a considerable number of sites in 2009-10 period (100 dwellings) which is (year 2 of the 5 year period). A delay in these will require more Greenfield sites to be identified in order to meet the shortfall.

11. Finally we note that the East of England Plan expresses its land supply requirement as a minimum. This strategy is not reflected in the

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Submission version of the Core Strategy policy H2.

12. In summary since neither the UCS nor the Annual Monitoring Report form a SHLAA, reservations are maintained about the degree to which sufficient housing land has been identified.

Policy H3

In the Preferred Options Core Strategy 2008 more locations were identified for housing growth in the post 2021 phase. Whilst it is our view that land south of Hockley/Hawkwell should benefit from a greater number of dwellings than the 175 currently identified (330) in order to make the strategy effective. We are concerned at the significant change in strategy between the Preferred Option Core Strategy and the Submission version, which has significantly less housing growth on green field sites. This change in strategy is so significant that we would question whether it is appropriate in the context of soundness and the consultation processes that have taken place so far.

We also have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with other policies in the SCS and feel that Green Belt review should be more explicit throughout the SCS. As it currently stands there is a potential conflict with national policies and limited justification for the Green belt strategy. We note that in Policy H3, which indicates the need for Green Belt land review, the advice is limited and unclear. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H3 and Policy GB1/H2 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary. Not to do so is unsound for justification and effectiveness reasons.

Policy H4 - Affordable Housing

As currently drafted we feel that the policy is not concise enough and that the policy does not reflect current guidance. The phrase 'at least' would indicate that in most cases affordable housing above 35% will be sought. Our understanding is that the 35% figure is recommended in the SHMA and that to provide a policy framework which seeks to go beyond that figure would potentially be unworkable as many sites could not financially bare the burden of over a third of the net developable area not yielding a value. The policy should be redrafted so that "a target of 35% affordable housing shall be provided on all developments of 15 or more units..."

The last policy paragraph provides some scope to relax this policy, if there are clear site constraints that make on site provision impossible. The policy, though, is not particularly clear on what would constitute exceptional circumstances. For example, physical site constraints, which unusually raise development costs, would be one such reason and this should be specified. There may be other reasons including the nature of housing needs in the part of the District the site is located which justify affordable housing below the 35% target. Design reasons may also have a bearing on how provision is made and in what form, particularly if the site is in an historic area where design might override housing need argument. It is therefore recommended that the policy expand on the type of circumstances where affordable housing may be relaxed and the type of information that will be sought of applicant's who have a need to invoke this part of the policy.

Policy H5

In support of the policy, it is advantageous that no percentages requiring a specific mix are included. This flexibility will enable developers and the Council to respond directly to changing circumstances in the local housing market. In the past some authorities have set out a percentage for the type of housing they require only to find that after a few years of strict implementation there is an oversupply of property of that type and no flexibility in the policy to address the problem.

Policy ED2 - London Southend Airport

It is considered that to grow non aviation related employment at a location north of Southend Airport where sustainable access from the rest of Rochford District requires careful consideration. Most Airports are serviced by aviation related employment development and as such a location close to the airport is sensible and sustainable. However, for surface access reasons it would be inappropriate to encourage travel from Rochford's main settlements to what essentially

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would be a rural location for general employment uses. Whilst sustainable access would be improved by a railway station and better bus links, there is no evidence to suggest that a sustainable surface access strategy for non related employment development at the Airport can be achieved. Paragraph 11.22 explains the critical importance of a railway station to the delivery of the strategy yet the Transport Chapter and Implementation Chapter provide neither a policy nor an assessment of deliverability. It is also notable that the South Essex Rapid Transit Policy T4, as set out at paragraph 10.16, notes that Rochford is not proposed to be served but may be served in future phases. This uncertainty is no way to plan for a major employment land supply strategy in the District. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley/Hawkwell, Rochford and Rayleigh is unsound.

Policy ED3

We fully support the first sentence of the Policy and note the apparent contradiction with the statements in Policy H1 and elsewhere which seeks to develop on alternative uses at industrial estates such as Eldon Way.

This contradiction is evidence in the second paragraph of Policy ED3. In our representations on Policy H1 we have explained why it is not sound to diminish the employment stock at Eldon Way and the importance of maintaining a dominance of employment type uses at this estate. These arguments are not repeated here.

We note the sentiments of the third paragraph and in accordance with our representations elsewhere are of the view that this sentence should be revised to explain that Eldon Way will accommodate principally employment type uses. As noted elsewhere uses which are an alternative to employment would diminish this highly sustainable employment site and this is unsound when assessed against National Policy.

Policy ED4 - Future Employment Allocations

In part, the de-allocation strategy is not supported as it is considered unsound when set against sustainability criteria. In relation to the Eldon Way Industrial Estate it is considered critical to the ongoing sustainability of this settlement that employment uses are maintained at this location. It is close to the railway station, bus routes and local residential areas from which the opportunity exists for employees to walk or cycle to work. Its location adjacent to the Town Centre offers opportunity for some retail and leisure development to complement the centre and to maintain a supporting function. These sustainable benefits would not occur with the deallocation of Eldon Way or the significant erosion of its employment floorspace. Whilst redevelopment of the employment site to achieve new employment is supported, the dominant land use should continue to be employment use. As a consequence, the 18ha of land required for employment in this policy is considered to be excessive and the policy should be reviewed to explain that redevelopment of existing employment sites for primarily new employment development will be encouraged.

Policy T4

It is noted that the South Essex Rapid Transit policy, as elaborated upon at paragraph 10.16 notes that Rochford is not served but may be served in future phases. This uncertainty is contrary to the delivery principles of soundness and directly puts at issue the employment land supply strategy in the District which is founded on sustainable access to new sites. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley, Rochford and Rayleigh is unsound.

Appendix H1, CTL1 - Infrastructure

It is recognised that necessary infrastructure provision is an important part of creating a sustainable development and in that context appendix H1 is supported. The supporting text notes that the table at Appendix H1 is not exhaustive and in that context it is very important that the framework properly distinguishes between what should be provided as part of new development schemes and what shouldn't. It is therefore essential that the framework acknowledges the importance of Circular 05/05 and the tests which say that provision of infrastructure and/or contributions should be:

- * Relevant to planning
- * Necessary to make the proposed development acceptable in planning terms
- * Directly related to the proposed development
- * Fairly and reasonably related in scale and kind to the proposed development
- * Reasonable in all other respects

As is made clear (Paragraph B9 of Circular 5/05) contributions should not be used to make good existing deficiencies in infrastructure provision. Nor are they to be used to secure contributions to the achievement of wider planning objectives that are not necessary for consent to be granted. In that context the Core Strategy should set this out as its policy framework.

Policy GB1 - Green Belt

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CHAPTER 4 Policy H4 - Affordable Housing

The objectives of this policy are supported, although as noted in other representations the SCS is unsound as it does not meet the tests in relation to justification, compliance with national policy or effectiveness of strategy.

Policy GB1 mentions the objective to allocate the minimum amount of Green Belt land necessary. The policy should link to the requirements of PPG2 and RSS which are discussed in relation to the representations on Policy H2 and H3. The policy should set out a timeframe for the review and why Rochford requires a Green Belt review (what the exceptional circumstances are in this District that justify a review of local boundaries. The policy should be amended to set out a 2031 time frame and this may require the SCS to have an extended life span beyond 2021.

We would recommend the deletion of the word character since Green Belt designation is not related to landscape character as currently drafted. For clarity we would also recommend that the Policy or its supporting text explain that a Green Belt review will take place in support of an allocations document (paragraph 6.6) in order to identify an appropriate new boundary. This is particularly necessary given the commitment to a Green belt review in the adopted Local Development Scheme.

Policy CLT1 - Planning Obligations and Standard Charges

In view of the need to test fully the basis on which standard charges are based it is important that any document produced is in a development plan document that enables an examination in public. The policy should explain this in order that when the document is produced it accords with Policy and is based on sound evidence.

ENV9 - Code for Sustainable Homes

Object. The advice from the Department of Communities and Local Government is that the new requirement to have a rating against the Code does not make it mandatory to build a Code home or to have each new home assessed against the Code. It does however mean that all buyers of new homes be given clear information about the sustainability of the new home. A house builder can do this in one of two ways:

- they can choose to build a Code home, have that home assessed against the Code and provide the home buyer with a Code certificate stating the star rating the home has achieved
- or, they can choose to build to current building regulations standards, not to pay for an assessment and instead download a nil-rated certificate of non-assessment (also referred to as a nil-rating) to provide to the home buyer.

As such the Rochford policy requirement that coding 3 be achieved by 2010 and Code 6 by 2013 is out of step with Government advice. The policy wording should explain that it is just the coding that is a requirement of new homes and not necessarily that new homes should be constructed to achieve a standard.

The current Government objectives are for the code to be introduced over a reasonable period with development to be code 3 by 2010, code level 4 by 2013 and code level 5 by 2016. In this regard the policy, as drafted, seeks to achieve code 6 by 2013 and consequently compresses the code requirements into a shorter time scale with the costs associated expected to be subsumed within the housing market through higher prices. This is not a realistic strategy for the delivery of sustainable homes and we consider that the policy should be revised to extend the period of compliance but to also make it more flexible based on local circumstances.

Research undertaken on behalf of the Housing Corporation and English Partnerships, published in February 2007 'A cost review of the code for sustainable homes' reveals that code 6 is unlikely to be unattainable given existing technologies and that achieving code 5 could result in a 12% to 20% increase in costs that would have to be passed onto the consumer. Given the variability of the housing market with peaks and troughs, it is unlikely that the housing market would be able to subsume this level of price increase.

The code system policy as currently drafted does not have regard to site circumstances and so many of the requirements could be difficult to meet. For example, micro electricity generation on site may be difficult to achieve where local circumstances deter the capture of wind or solar power. If more expensive technologies are required to generate power than is the norm then costs will rise. There may be other competing reasons why designs cannot include certain sustainability measures if housing sites are in sensitive landscape and historic locations. Alternatively there may be significant development costs associated with site specific circumstances and so viability of the site's development becomes a valid consideration. By insisting on the code for sustainable homes other policy objectives such as affordable housing at particular rates and other contributions may need to be reconsidered. Consequently, we are of the view that this policy should be drafted in a manner which enables site specific circumstances to be taken into account. As noted above the Government explains that the code is a certification requirement and does not necessarily mean that buildings are constructed in accordance with a code level.

It is also important to note that it is not the purpose of planning legislation to duplicate other legislation. In this regard, the policy should accept that the Building Regulations will be the main vehicle for implementing this policy and that unless the coding requires external development then there will be no need to specify what is to be carried out in a planning application.

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CHAPTER 4 Policy H4 - Affordable Housing

Summary: Policy H4 - Affordable Housing

As currently drafted we feel that the policy is not concise enough and that the policy does not reflect current guidance. The phrase 'at least' would indicate that in most cases affordable housing above 35% will be sought. Our understanding is that the 35% figure is recommended in the SHMA and that to provide a policy framework which seeks to go beyond that figure would potentially be unworkable as many sites could not financially bare the burden of over a third of the net developable area not yielding a value. The policy should be redrafted so that "a target of 35% affordable housing shall be provided on all developments of 15 or more units..."

The last policy paragraph provides some scope to relax this policy, if there are clear site constraints that make on site provision impossible. The policy, though, is not particularly clear on what would constitute exceptional circumstances. For example, physical site constraints, which unusually raise development costs, would be one such reason and this should be specified. There may be other reasons including the nature of housing needs in the part of the District the site is located which justify affordable housing below the 35% target. Design reasons may also have a bearing on how provision is made and in what form, particularly if the site is in an historic area where design might override housing need argument. It is therefore recommended that the policy expand on the type of circumstances where affordable housing may be relaxed and the type of information that will be sought of applicant's who have a need to invoke this part of the policy.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** ii

Core Strategy Submission Document

O - 15701 - 7840 - Dwelling Types, 4.33 - iii

15701 Object

CHAPTER 4 Dwelling Types, 4.33

Respondent: Mrs Jane McClure [7840]

230 Hockley Road
Rayleigh
Essex
SS6 8EU
01268771971

Agent: N/A

Full Text: most people do not want to live in rabbit hutches or flats. Such estates after a while begin to look tatty and ill-kept even though they are starter home - there are quite a few estates like this in the surrounding area. Most people like to have affordable spread of housing ie. three+ bedrooms not less.

Summary: most people do not want to live in rabbit hutches or flats. Such estates after a while begin to look tatty and ill-kept even though they are starter home - there are quite a few estates like this in the surrounding area. Most people like to have affordable spread of housing ie. three+ bedrooms not less.

Change to Plan most people do not want to live in rabbit hutches or flats. Such estates after a while begin to look tatty and ill-kept even though they are starter home - there are quite a few estates like this in the surrounding area. Most people like to have affordable spread of housing ie. three+ bedrooms not less.

Appear at exam? No

Soundness Tests iii

Core Strategy Submission Document

S - 15890 - 14113 - Policy H5 - Dwelling Types - None

15890 Support

CHAPTER 4 Policy H5 - Dwelling Types

Respondent: Sanctuary housing association (Miss Sarah Brind) **Agent:** N/A
[14113]

Sanctuary housing association
Collier House
Mead Lane
Hertford
SG13 7UZ
01992 513441

Full Text: We support the requirement for affordable housing elements to reflect the Strategic housing market assessment, and in particular we believe that the provision of houses as opposed to flats should be encouraged

Summary: We support the requirement for affordable housing elements to reflect the Strategic housing market assessment, and in particular we believe that the provision of houses as opposed to flats should be encouraged

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 15919 - 9936 - Policy H5 - Dwelling Types - None

15919 Support

CHAPTER 4 Policy H5 - Dwelling Types

Respondent: Mr David Grew [9936]

PO Box 2091
Hockley
Essex
SS5 4WR
UK
07740201389

Agent: Mr David Grew [9936]

PO Box 2091
Hockley
Essex
SS5 4WR
UK
07740201389

Full Text: Agree that the Council should aim to provide a mix of dwellings in all development.

Summary: Agree that the Council should aim to provide a mix of dwellings in all development.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 15951 - 10849 - Policy H5 - Dwelling Types - None

15951 Support

CHAPTER 4 Policy H5 - Dwelling Types

Respondent: Canewdon Parish Council (Mrs Kelly Holland)
[10849]
Canewdon Parish Council
33 Rowan Way
Canewdon
Essex
SS4 3PD

Agent: N/A

Full Text: Future housing in the village of Canewdon needs to be of an appropriate mix of size. We particularly would like to see dwellings that would allow the next generation and older people downsizing to reside in the village if they wish. We do not need just volume builders' 4 bed executive houses.

Summary: Future housing in the village of Canewdon needs to be of an appropriate mix of size. We particularly would like to see dwellings that would allow the next generation and older people downsizing to reside in the village if they wish. We do not need just volume builders' 4 bed executive houses.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16355 - 8267 - Policy H5 - Dwelling Types - ii

16355 Object

CHAPTER 4 Policy H5 - Dwelling Types

Respondent: Aber Ltd [8267]

Aber Ltd
C/o Agent

Agent: Colliers CRE (Mr S Chapman) [8266]

Colliers CRE
9 Marylebone Lane
London
W1U 1HL
020 7344 6533

Full Text:

The idea of providing a mix of dwelling types in both size and tenure is supported, however, it is considered that to make a specific requirement that a proportion of the affordable housing to be three bedroom dwellings is too prescriptive, and such a requirement is better placed within a relevant Supplementary Planning Document.

Requirements relating to the size of dwellings may change over the plan period in response to changes in demographics. Housing should be provided which meets housing need as identified by a plan, monitor and manage approach.

Delete from policy:

A proportion of the affordable housing provision within developments will be required to be in the form of three-bedroom or larger dwellings.

Summary:

The idea of providing a mix of dwelling types in both size and tenure is supported, however, it is considered that to make a specific requirement that a proportion of the affordable housing to be three bedroom dwellings is too prescriptive, and such a requirement is better placed within a relevant Supplementary Planning Document.

Requirements relating to the size of dwellings may change over the plan period in response to changes in demographics. Housing should be provided which meets housing need as identified by a plan, monitor and manage approach.

Change to Plan

Delete from policy:

A proportion of the affordable housing provision within developments will be required to be in the form of three-bedroom or larger dwellings.

Appear at exam? No

Soundness Tests ii

Core Strategy Submission Document

O - 16461 - 7507 - Policy H5 - Dwelling Types - ii

16461 Object

CHAPTER 4 Policy H5 - Dwelling Types

Respondent: Mr S Welsh [7507]

Hanover Land Trust
35 Castle Road
Rayleigh
Essex
SS6 7QD

Agent: N/A

Full Text: We consider the DPD is potentially unsound depending on the final selection of specific sites or site in South West Hullbridge.

Please see attached statements 1, 2, 3 and 4 evidential statement.

The precise wording should correlate to the proposal of the attached statements, although the issue may be resolved by publication of the allocations development plan document.

Oral participation will depend on whether the proposed site is included in the allocation development plan document for specific sites for future development, if the proposed site is included oral participation will not be required or necessary.

Summary: We consider the DPD is potentially unsound depending on the final selection of specific sites or site in South West Hullbridge.

Please see attached statements 1, 2, 3 and 4 evidential statement.

Change to Plan The precise wording should correlate to the proposal of the attached statements, although the issue may be resolved by publication of the allocations development plan document.

Appear at exam? Yes

Soundness Tests ii

Core Strategy Submission Document

S - 16877 - 8329 - Policy H5 - Dwelling Types - None

16877 Support

CHAPTER 4 Policy H5 - Dwelling Types

Respondent: Swan Hill Homes Limited [8329]

Swan Hill Homes Limited
C/O Agent
Mr P Kneen
Charles Planning

Agent: Charles Planning Associates Ltd (Mr P Kneen) [5040]

Charles Planning Associates Ltd
1644-1645 Parkway
Solent Business Park
Whiteley
Fareham
Hampshire
PO15 7AH
01489 580853

Full Text:

1.0 Instruction and Introduction

1.1 Charles Planning Associates Limited (Chartered Town Planners) is Instructed by Swan Hill Homes Limited (Swan Hill) to prepare and submit representations on their behalf in respect of the Rochford District Local Development Framework: Core Strategy Submission (September 2009) Development Plan Document.

1.2 The comments refer to the relevant sections and policy designations in the Submission document, as appropriate.

1.3 The comments set out in this submission are intended to assist the District Council in taking forward its Local Development Framework. It is our intention to continue to be involved in the LDF preparation process and we look forward to the opportunity to comment further at the Examination to the Core Strategy.

1.4 If you have any queries regarding the content of this submission then please do not hesitate to contact:

Peter Kneen BSc (Hons) MSc MRTPI
Planner

2.0 Housing:
Policy H1 - The Efficient Use of Land for Housing

2.1 Swan Hill recognises the importance of seeking to concentrate new developments mainly in the existing urban areas, on previously developed land where possible, particularly in view of the Government seeking to ensure 60% of all such new developments are on previously development land (PDL).

2.2 However, given the character of the District, and the strategic housing requirement of the East of England Plan, Swan Hill supports the approach that the Council must also make provision for additional development on the edge of existing settlements on greenfield sites, particularly in the most sustainable locations. As such, Swan Hill supports that where feasible, the redevelopment of existing employment sites for residential/employment purposes can make a contribution towards the strategic housing requirement, provided that sufficient additional employment land is brought forward to ensure the stability of employment levels in the District, and to ensure employment growth meets the East of England Plan requirements.

2.3 Swan Hill considers that Policy H1 should include consideration that new extensions to existing settlements have regard to their potential impact on the wider characteristics and openness objectives of the Green Belt.

Policy H2 - Extensions to Residential Envelopes and Phasing

2.4 Swan Hill generally supports the approach taken by the Council in this policy. As set out above, Swan Hill consider the Council's acknowledgment that housing requirements should be met through the allocation of land on the edge of the existing settlements is the most suitable way forward to meeting the Council's strategic housing requirement and complies with the advice in PPS3.

2.5 The need for suitable greenfield urban extensions represents the best way forward for the Council to meet its strategic housing requirement, as set out in the East of England Plan. Swan Hill supports the recognition that the potential supply of alternative previously developed sites is limited, without detrimentally affecting the character of the District, and therefore the best way forward is the use of sustainable greenfield urban extensions to the existing settlements of the District.

2.6 However, Swan Hill consider that a fundamental consideration that the District Council should consider relates to the potential impact of the urban extensions on the Green Belt policy has been somewhat overlooked. The wider sustainability credentials of the settlements of the District should only be one of many key considerations for determining the level of expansion. In view of the proximity of Southend-on-Sea to all the main settlements of the District, and the influence this has on the likely location many people would travel for employment and leisure, sustainability of many of the settlements is not a key overarching factor, and greater weight should be placed on the potential impact on the openness of the Green Belt, as this cannot be remedied if development occurs in the wrong location.

2.7 As such, Swan Hill considers that determining the location of growth for the main settlements should be to identify

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those locations where the impact on the wider setting of the Green Belt can be minimised. Further justification for those general locations chosen should be identified in Policy H2. In this regard, Swan Hill has serious concerns regarding the removal of Land South West of Great Wakering as a viable option for the growth of the settlement. The development of this area of Great Wakering, in addition to the potential redevelopment of the Star Lane Industrial Estate could provide a more comprehensive development, whilst ensuring that the wider openness of the Green Belt is maintained. Land South West of Great Wakering is significantly better placed to limit the impact on the wider Green Belt than Land West of Great Wakering, and could contribute to the provision of an important amenity and wildlife site for the local community.

2.8 In addition, Swan Hill consider that the Council now has no reserve provision in the event that any of the existing employment sites set out in Policy H1 fail to come forward for development within the envisaged timescale. Further, Land West of Great Wakering has not been identified in the SHLAA as a deliverable site to help meet the strategic housing requirement, contrary to the requirement set out in PPS3.

2.9 As such, Swan Hill would support the provision of suitable sites which could be safeguarded for future development in the likelihood of a shortfall in supply.

Policy H3 - Extensions to Residential Envelopes Post 2021

2.10 As set out above, Swan Hill supports the overall approach the Council has taken towards the provision of sustainable urban extensions as a suitable means of meeting their strategic housing requirement. However, as set out for Policy H2 above, Swan Hill has serious concerns regarding the removal of several proposed sites set out in the October 2008 Preferred Options Core Strategy, without any guarantee of the ability to deliver those sites set out in Policy H1.

2.11 As also considered above, the inclusion of West of Great Wakering for 250 dwellings should not be included ahead of South West of Great Wakering, in view of the fact that the site is not identified in the SHLAA as available, suitable and achievable as required by PPS3, and thus is not supported by a robust and creditable evidence base for its inclusion as a strategic site for development.

2.12 Whilst Swan Hill acknowledge that alterations to Policy H1 has resulted in the removal of some locations for growth in Policy H3 (as set out in the Sustainability Appraisal), Swan Hill does not consider that the most appropriate locations have been chosen.

2.13 In addition to the matters raised above, the use of West of Great Wakering would also result in the loss of valuable agricultural land, which clearly in a Green Belt location, should be less suitable for development than other sites, such as South West of Great Wakering, which would have limited impact on the wider Green Belt policy, and not result in the loss of valuable agricultural land.

2.14 Finally, in respect of Policies H1, H2 and H3, all of the above comments are based on our interpretation of the Submission Version Core Strategy when compared to the October 2008 Version of the Core Strategy. Without the ability to undertake a detailed assessment of the Council's SHLAA, it is not possible to clarify the proposed Core Strategy position regarding the proposed direction of growth proposed for the settlements in the District. As such, Swan Hill reserves the right to make additional representations regarding the proposed Policies H1, H2 and H3 following the publication of the SHLAA in due course.

Policy H4 - Affordable Housing

2.15 In general terms, Swan Hill supports the approach taken by the Council towards the provision of affordable housing for new residential developments. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H5 - Dwelling Types

2.16 Swan Hill supports the policy provision of H5, and considers that the approach taken by the Council for this policy represents a suitably flexible alternative to stipulating percentages of dwelling mix, sought by some local authorities. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H6 - Lifetime Homes

2.17 In regard to this policy, Swan Hill objects to the Council's policy where all new dwellings should be provided to the Lifetime Homes Standard. Whilst it is acknowledged that the UK has an aging population, Swan Hill considers that seeking to provide Lifetime Homes on all sites is considered to be overly onerous for proposed developers, particularly when considering the requirement for all car parking spaces to be suitable for disabled users, which could result in more schemes becoming unviable. Therefore, the provision of a percentage of Lifetime Homes should be considered through negotiations with the Council at the planning application stage, and should be determined on a case-by-case basis.

3.0 Character of Place: Policy CP1 - Design

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3.1 The Town and Country Planning (General Development Procedure) Order 1995 (As Amended) makes the submission of a Design and Access Statement for most types of planning applications a Statutory requirement, and as such, the provision of a Design Brief represents a pre-requisite of all major planning applications.

3.2 Policy CP1 seeks to ensure the provision of good, high quality developments that reflect local characteristics and distinctiveness, this ideology is supported by Swan Hill.

4.0 The Green Belt:
Policy GB1 - Green Belt Protection

4.1 Following the amendments to the wording of the Policy since the October 2008 Preferred Options Core Strategy, Swan Hill is now generally supportive of Policy GB1 and its supporting text. However, as expressed above, it is important that where alterations to the Green Belt boundary occur as a result of the extension of the settlements to meet the strategic housing requirement, both the minimal amount of land is taken and where that land is taken for development, it represents the best available land which has a minimal impact of the wider openness characteristic of the Green Belt.

5.0 Environmental Issues:
Policy ENV3 - Flood Risk

5.1 Swan Hill generally supports the approach set out in Policy ENV3 regarding ensuring development accords with the sequential test of PPS25. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV4 - Sustainable Drainage Systems (SUDS)

5.2 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV4. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV8 - On-site Renewable and Low Carbon Energy Generation

5.3 Whilst Swan Hill recognises the importance of reducing carbon emissions, particularly in new housing developments, and the role this can play in reducing the nations overall Greenhouse emissions. As such Swan Hill is generally supportive of Policy ENV8. It is noted that Policy ENG1 of the East of England Plan sets out a threshold of developments comprising 10 or more dwellings. Swan Hill consider it important for the District Council to justify the reduction in the threshold level.

5.4 Further, no assessment of Policy ENV8 has been set out in the Sustainability Appraisal which justifies the change in threshold from that of Policy ENG1 of the RSS.

Policy ENV9 - Code for Sustainable Homes

5.5 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV9. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

6.0 Community Infrastructure, Leisure and Tourism:
Policy CLT1 - Planning Obligations and Standard Charges

6.1 Swan Hill generally supports the overall approach the Council has taken in Policy CLT1. It is considered Policy CLT1 sets out a degree of flexibility to ensure that all sites are considered on a site-by-site basis, assessing the individual merits of each planning application, in order to ensure the levels of contributions applicable meet the five tests of Circular 05/05. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policies CLT5 - Open Space;
CLT7 - Play Space;
CLT8 - Youth Facilities; and,
CLT10 - Playing Pitches

6.2 Swan Hill supports the need for new residential developments to incorporate a degree of new publicly accessible open space, children's play space, youth facilities and playing pitches, and as such, generally supports the policy approaches taken by the Council.

6.3 However, it is important that whilst the Council may seek to undertake an assessment of providing standard charges for new development, which, as set out in Policy CLT1, this should be based on thorough public consultation and consideration and sound justification. Swan Hill consider that within the provision of a standard charge, it is important that such provision allows for a degree of flexibility to ensure that each site is assessed individually and on its own merits. This is particularly important for those sites close to existing open spaces and facilities. As such, the levels of

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open space and recreation facilities required in the 'standard charge' should be based on an up-to-date PPG17 Open Space assessment, which should be used to form a key consideration in the levels of provision likely to be required in the standard charge system proposed.

7.0 Transport: Policy T1 - Highways

7.1 Swan Hill supports the overall objectives set out in Policy T1 requiring developments to be located and designed to reduce the reliance on the private car and to meet the infrastructure needs generated by development or seek to help achieve these needs is acceptable in principle.

7.2 Swan Hill recognises the importance of providing sufficient infrastructure provision to meet the requirements of development, and that where developments have insufficient consideration of impact on existing infrastructure, they should be considered unacceptable and contrary to National policy guidance. However, Swan Hill considers it important to emphasise that the developer's role should not be seen as a means to meet existing shortfalls in provision.

Policy T3 - Public Transport

7.3 Swan Hill is generally supportive of the policy approach set out in T3, however, as set out in paragraph 7.2 above, it is important that the District Council do not consider that it is the developer's responsibility to resolve existing shortfalls in provision of public transport, and any contribution towards additional public transportation provision should only be to mitigate against the additional level of demand likely from the development proposed.

Policy T5 - Cycling and Walking

7.4 Swan Hill supports the general approach to this policy, as Swan Hill recognises the importance of promoting the use of alternatives to the private car. The policy provision acknowledges the need to ensure relevant contributions in the event of additional travel demands generated by individual developments, whilst also setting out additional aspirations for the cycle network in the District.

7.5 As such, Swan Hill considers this policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy T8 - Parking Standards

7.6 The Council has recently (January 2007) adopted SPD on the requirements for parking standards, and as such, Swan Hill generally supports the policy approach chosen by the Council. As set out in the SPD, whilst Swan Hill generally supports the approach taken by the District Council towards setting residential parking standards, in that the Council has recognised that in the suburban areas, even with some access to public transport, the majority of residents will rely on the use of private cars. However, Swan Hill has concerns over the failure of the District Council to comply with the provisions of PPG13: Transport (2001) which sets out that Local Planning Authorities should not set minimum standards for car parking. Whilst it is acknowledged that PPS3 sets out provision for the consideration of local circumstances, it is considered that the Council has not justified this deviation from PPG13's maximum standard.

7.7 Whilst it is acknowledged that such justification may become apparent through the work currently being undertaken by Essex County Council, until such time, the District Council should only seek to apply the maximum standards indicated in PPG13. However, Swan Hill recommends that the District Council make provisions in the wording of the Policy to allow for changes in the event that future policy on car parking standards need to reflect the County standard, following the completion of the County Council review.

8.0 Economic Development: Policies ED3 - Existing Employment Land ED4 - Future Employment Allocations

8.1 In respect of Policies ED3 and ED4, Swan Hill notes that they have changed considerably since the October 2008 Preferred Options document, in that they are site specific regarding the location of the proposed redevelopment of existing employment sites. These four sites are also identified in Policy H1 - Efficient Use of Land, and in general, Swan Hill supports the approach to the redevelopment of these sites (where feasible) based on the assessments of the sites set out in this version of the Core Strategy.

8.2 However, Swan Hill has concerns that these policies might not be considered suitably sound given that insufficient opportunity has been allocated for consultation on their redevelopment. Without the SHLAA being publically available prior to the consultation on this Core Strategy, an insufficient evidence base has been provided to corroborate that these sites are neither suitable or deliverable to meet the test of soundness requirements.

Summary:

Policy H5 - Dwelling Types

2.16 Swan Hill supports the policy provision of H5, and considers that the approach taken by the Council for this policy represents a suitably flexible alternative to stipulating percentages of dwelling mix, sought by some local authorities.

Core Strategy Submission Document

S - 16877 - 8329 - Policy H5 - Dwelling Types - None

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The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16922 - 10009 - Policy H5 - Dwelling Types - None

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Full Text: Local Development Framework

Representations on the Core Strategy
Submission Document, November 2009
On behalf of Barratts Eastern Counties

Introduction

The requirements of Core Strategies are enshrined in the 2004 Planning and Compensation Act, the Town & Country Planning (Local Development) England (Regulations) 2004 and the 2008 policy guidance in PPS12. The requirements of Coe Strategies are clear. And they are legal requirements. The Core Strategy must comply with the Local Development Scheme, Statement of Community Involvement and the Regulations. The Core Strategy must be subject to a sustainability appraisal, have regard to national guidance, conform generally with the Regional Spatial Strategy and have regard to any Sustainable Community Strategy. A Core strategy must be sound - justified, effective and consistent with national policy. The following representations therefore focus on these legal requirements.

HOUSING

Paragraph 4.6 - Evidence Base

To meet the soundness test Submission Core Strategies (SCS) must be justified, that is to say it must be founded on robust and credible evidence base and comprise the most appropriate strategy when considered against reasonable alternatives. The housing strategy in as far as it identifies a need for Green belt sites is sound, however, there are other elements which are unsound.

Paragraph 4.6 notes that the Strategic Housing Land Availability Assessment (SHLAA) has examined the supply of housing. It is presumed that the Table at paragraph 4.6 is the outcome of this examination. Whilst the SHLAA has some legitimacy in that it identifies various sites that are apparently available, we are concerned that because the SHLAA was only published in November 2009 it post dates the SCS. This implies that the SCS is driving the SHLAA exercise rather than the other way round. Whilst this may have no real practical effect on the outcome of the SCS and the identified need for Green Belt sites, the Inspector will be mindful of the advice in paragraphs 33 and 54 of PPS3 that SCS draw on the evidence in SHLAA. It may be that the SCS should explain how the evidence base has been used to justify the strategy.

PPS12 explains at paragraph 4.37 that Core Strategies are based on thorough evidence. Since the SHLAA has only recently been published it is considered that the SCS is unsound as it is not justifiable. This, together with other comments on the SCS, indicates that the process should be delayed to ensure that a more robust document is placed in front of the EiP Inspector.

Table at Paragraph 4.6 - Evidence base

From our review of the available evidence it would appear that the housing land supply is insufficient and that Green Belt release are required. From the wider strategy being promoted we note that some of the sites that the District Council consider to be 'appropriate' are likely to relate to existing employment areas. As set out elsewhere in our representations, we maintain severe reservations that the redevelopment of existing employment sites for alternative uses and particularly the Eldon Way Industrial Estate is unsustainable. We will make reference to the effectiveness of this strategy in relation to sustainability, whether it is justified in the context of National Policy and the deliverability of such a strategy elsewhere.

In particular, paragraph 11.32 of the SCS refers to existing employment land and sites within the UCS. It does not refer the SHLAA and as such it appears that an evidence base to support the re-use of employment land for residential is not reported in the SCS.

Having reviewed the 2008 Annual Monitoring Report, as we did when commenting on the 2008 Preferred Options Core Strategy, we maintain severe doubts as to the appropriateness of some of the previously developed sites identified as potential housing sites and their expected housing yield. Whilst we cannot at this stage ascertain whether the SHLAA

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sites referred to in this table correlate with the Annual Monitoring Report and indeed the 2007 Urban Capacity Study, it is our view that there will be some commonality and so the reliance on these sites is likely to be at odds with Government Policy. We shall elaborate on this objection in relation to the specific housing policy below.

We note that the last two rows in the Table at paragraph 4.6 set out figures with and without Green Belt releases. The text to this section of the Core Strategy should, for reasons of clarity, explain that Green belt review will be necessary in order to deliver the required housing.

Paragraph 4.9

The table on page 40, which sets out the settlement tiers, is supported. Rayleigh, Rochford/Ashingdon, Hockley/Hawkwell are clearly the largest settlements in the District and they benefit from good employment, housing, leisure, community and public transport provision. These settlements are the most sustainable ones with the greatest mix of uses. Consequently, it is sensible that the Core Strategy identifies these as top tier settlements and is able to target them with growth accordingly. This component of the strategy is justified by reference to sustainability data and is effective, since targeting development at these locations will ensure a more sustainable pattern of development.

Paragraph 4.14

We maintain that the strategy for redeveloping the Eldon Way Industrial Estate for housing and other alternative uses to employment is unsound. It is neither justified nor effective. The Industrial Land Availability Study 2006 sets out on page 7 strategic objectives. The 3rd objective seeks to Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive. Clearly the strategy as currently drafted envisages major changes to existing industrial estates, including alternative uses. This strategy is not consistent with other strategies and evidence based studies and so cannot be justified in the context of the tests set out in PPS12. It is also an ineffective strategy since the new employment locations that would free up the Eldon Way site for redevelopment relies on transport infrastructure that has no certainty of being delivered. Principally, the erosion of employment uses at Eldon Way could make the settlement of Hockley/Hawkwell less sustainable and thus conflict with the tiered approach on page 40, paragraph 4.9.

Policy H1

Prioritising the use of previously developed land ("pdl") is supported in principle. It is a justified strategy in the context of PPS3 and effective as sequential choices can be made by implementing the policy. However, the District Council is also promoting a strategy which seeks the redevelopment of existing employment locations to alternative uses and by consequence is identifying green field sites for new employment development elsewhere (Policy ED4 refers). This 'land swapping' is not considered consistent with PPS3, nor is it considered to be justified or effective in delivering the desired strategy. This is particularly the case as most of the existing employment sites are occupied and therefore unavailable for redevelopment. In addition, the new Greenfield sites are in an arguably less sustainable locations away from the top tier settlements identified on page 40 of the Submission Core Strategy. Clearly this element of the strategy is inconsistent with the wider strategy.

The Industrial Land Availability Study 2006 is included as an evidence base by the District Council. It includes an introductory section, which explains that the authority wishes to make Rochford the place of choice for new business. It includes several strategic objectives on page 7 including "Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive." It reviews existing employment areas and identifies vacant land, including land available from allocations. It does not include any assessment of new sites or potential opportunities for new sites that might have been expected to feed into the Core Strategy. The strategy for identifying Green Belt site employment allocation does not appear to be based on any evidence in this document and in that context cannot be justified. The strategy being promoted potentially conflicts with Government policy in PPG13, PPG2 and emerging PPS4.

The Employment Land Study 2008 is a much later document. It has a key recommendation on page ii "we recommend that Rochford District Council adopts strong policies to protect existing employment land." Furthermore under recommendations for existing sites on page iii-iv of that document it states "In our view, Hockley Trading Centre is a strategically well placed employment location. However, we recognise the ambitions of the Hockley Town Centre masterplan and that within this the Council should consider it to be allocated for other uses. However, we recommend that this reallocation happen only if provision is made within the masterplan for office use within Hockley Town Centre as part of a mixed use scheme." The view of the writers of this document is clear - the Eldon Way Industrial estate (Hockley Trading Centre) is a good employment site and that it is for other reasons that alternative uses are being considered and only then if office development is supported. This supports our representations that new future uses at the Eldon Way site should be employment dominated and that alternative uses should relate to the objectives of the Town Centre which is to enhance the shopping and leisure facilities. Residential is not an appropriate alternative.

This document recommends the use of land to the west of Rayleigh for employment and envisages Green belt release. However, the SCS does not explain through the evidence base why existing employment sites should be 'deallocated' and Green belt land unnecessarily used.

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In addition to these key issues we have some specific concerns. As a consequence we maintain an objection to the second paragraph of Policy H1. This policy states that the Council will seek the redevelopment of various industrial estates including Eldon Way. The Policy says that alternative uses will be sought (presumably alternative to the existing employment offer) and that new land will be allocated elsewhere. This policy statement, in relation to Eldon Way in particular, is unsound for a number of reasons:

The emerging Hockley Area Action Plan consulted upon in 2008 states that the Eldon Way Industrial Estate is strategically well placed. In a sense this statement underplays the true importance of this highly sustainable employment location and only major employment area in Hockley/Hawkwell. The employment area is adjacent to the railway station and located a short distance from the main bus routes that run along Spa Road. Some of the residential areas of the town are also within walking distance of this commercial area, thus providing a potential for sustainable travel by employees. The Eldon Way Industrial Estate is therefore right at the heart of the settlement of Hockley/Hawkwell and provides an opportunity to meet sustainable transport objectives by reducing the need to travel by car. Consequently, this employment area should be highlighted as a premier employment site in sustainability terms, both in the context of PPG13, PPG4 and PPS6. To encourage alternative uses as set out in Policy H1 implies the removal of the majority of employment based activity at Hockley/Hawkwell and this would be contrary to National policy, would not be the most appropriate strategy when considered against alternatives and is therefore unsound.

Whilst it is acknowledged that improvement to the Eldon Way Industrial Estate can and should take place, the extent to which the mix of employment uses should be altered in favour of alternative land uses requires careful consideration. It is our view that a mix of existing or indeed new employment land uses with some Town Centre type uses should dominate the Eldon Way site. A mix of employment types between offices, light industry and other high technology industries should be encouraged as this will provide many locational advantages to the firms that agglomerate together. The Council says that the existing uses on this site are harmful to amenity. However, the site has operated for many years without any significant issues and if renewal for B1 type uses are encouraged then the employment area can be maintained without harm to amenity. Renewal of the employment stock can help develop and improve trade, improve the sustainability of businesses as a whole and make for a more flexible labour market as skill levels are varied. A singularly different use altogether or a variety of uses which excludes employment could undermine the long term sustainability of the area and Town Centre. As such Policy H1 is not an effective strategy and should be amended to acknowledge the importance of Eldon Way and the need to renew the employment stock to ensure that the site maintains its important role as a employment site, albeit with some ancillary alternative use development where appropriate.

The 2008 Retail Study notes that Hockley Town Centre is not strong and there is trade leakage. Eldon Way Industrial Estate provides a customer base for existing town centre uses. Weekday spending within town centres is an important contributor to the viability of many retail and leisure businesses either through expenditure by employees during the lunchtime trade or expenditure by employers, on necessary goods and services. This relationship helps sustain the critical mass of a centre and provides a platform for new retail and leisure growth. It is important to have a balanced centre with a variety of uses. Policy H1, as currently drafted, implies the removal of employment related development and this is likely to harm the vitality and viability of Hockley Town Centre. The Council has presented no evidence to suggest that this is not the case. Importantly, the 2008 Retail Study explains that there is a need for additional retail and office space. In principle we would support additional office and other B1 type uses plus retail but employment uses should always dominate for the sustainability reasons given above. Retail and office development are likely to present a viable alternative to some of the more industrial type uses.

Consequently, we do not support the phrasing of the third paragraph of Policy H1 and maintain that the most appropriate strategy is to seek renewal of the employment stock with employment based uses and with some new retail development. Removal of employment land uses completely as currently implied-which was the approach adopted in the emerging Hockley Area Action Plan - is not a justifiable strategy.

One of the key tests of a Core Strategy is consistency between policies in the emerging Plan and this strikes at the heart of demonstrating an effective strategy. Policy H1 implies alternative uses to employment and the relocation of Eldon Way to a site identified under Policy ED4. However, Policy RTC6 sets out a suite of policy criteria for Hockley Town Centre which includes employment and commercial activities. In addition Policy ED3 seeks the protection of sustainable employment sites (Eldon Way) and notes that some reallocation of existing employment sites will include a proportion of employment. It notes that in the case of Eldon Way employment development will form a component. The policies appear at odds with one another. The third paragraph of Policy H1 should be deleted as the second paragraph is sufficient to set a strategic context for delivering new housing development. The employment policies and Hockley specific policies should be left to consider the type and quantum of land uses appropriate in the area. If the third paragraph of H1 is to be retained then it should tie in more with Policy RTC6 and in our view explain that employment uses should dominate any redevelopment proposals for the Eldon Way site and that retail and leisure uses should be a supporting proportion.

Implementation, Monitoring and Delivery - page 132 onwards

One of the key tests of soundness is that the Core Strategy should be effective - it should be able to deliver its strategy. The Implementation strategy set out at page 132 onwards of the Core Strategy does not explain how Policy H1, RTC6 and the strategy for redeveloping Eldon Way (Policy ED2 and ED3) will be delivered. The comment at Policy ED3 on

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page 161 identifies it as a potential risk and alludes to land assembly difficulties and the choices to be made by owner/occupiers. In order to deliver the strategy there should be a clear understanding as to whether the new land use values being promoted are sufficient to encourage relocation voluntarily. Secondly there is a need for more information to be gathered and presented to show that current occupiers and landowners are willing to relocate and the timescales likely for this. For example, do the building lease contracts enable early review or are there any break out clauses. There should be some commentary on whether the Council will engage in compulsory purchase orders to pursue their strategy should the 'encouragement' route fail. As currently drafted there is no clear path to deliver the strategy and the danger is that despite reallocation, the sites identified for redevelopment will not come forward in the plan period. In this regard, evidence to satisfy the test of soundness is not provided.

Policy H2 - General Locations

We support the strategy that new housing growth should be targeted at land South of Hawkwell. This area is suitably located to the urban area of Hockley/Hawkwell and to tie in with the settlement tiers on page 40 of the Submission Core Strategy the same terminology for settlement should be used. This ensures a consistency within the SCS. The choice of this location as a housing growth area is appropriate as it would not contribute to the coalescence of the urban area with Ashingdon (there is existing development between this identified housing area at Rectory Road and Ashingdon and moreover, Rectory Road can form a natural physical boundary for the new Green belt boundary. This area is also well located to the existing road network. Cherry Orchard Way has recently been improved and provides much better accessibility to the proposed housing growth area than any other location around Hockley/Hawkwell. The existing bus routes along Rectory Road also make this location sustainable and the additional housing proposed will help underpin the financial viability of bus routes in this area. Locally there are employment opportunities, including the small commercial estate off Main Road. The Eldon Way Industrial Estate adjacent to the Town Centre also provides the opportunity for employment locally. Extensive public open space, play pitches and built leisure facilities are located just to the north of this area and a community hall is located off Briar Close, nearby. The area to the south of Hockley/Hawkwell is close to local shops on the corner of Heycroft Road and Main Road and there are numerous footpath links between this area and the local community including links via Thorpe Road, Thorpe Close, Briar Close, Hawkwell Park and Park Gardens. The area therefore provides the opportunity to enhance existing links, including cycle links, and contribute towards community integration - more so than other sites on the south side of this settlement. The site is also in the control of one house builder and deliverable.

However, we find that the Policy is not fully consistent with national policy and furthermore needs to be reviewed in order to be justified and effective. We have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with this policy and feel that Green Belt review should be more explicit throughout the SCS. We note that it is only Policy H3 which indicates the need for Green Belt land review. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H2 and certainly Policy H3 and Policy GB1 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary.

Policy H2 - Phasing and Quantum

The 2008 Preferred Core Strategy document indicated that the area south of Hawkwell should deliver 330 dwellings over a phasing period to post 2021 (see Policy H2 and H3 of that document). The SCS reduces the quantum of housing in this area to 175 but expects delivery by 2015. At a broader level the Preferred Options Core Strategy of 2008, (Policy H2) required 1,450 dwellings to 2015 and a further 1,050 by 2021. In the SCS the figures are now 775 and 1,010 respectively.

Since the SHLAA post dates the publication of the SCS, we are uncertain as to the reason why such a significant reduction in quantum of housing and extensions to the residential envelope is considered necessary. Presumably it is the 'new' strategy to redevelop existing employment areas within the settlements that has led to this change. Our representations on this strategy and specifically the Eldon Way Industrial Estate are included elsewhere within our representations. Previously we have commented on the Table at paragraph 4.6 of the Submission Core Strategy and the lack of evidence to underpin that table. It seems odd that in the space of a year the expected requirement for Greenfield sites has effectively halved on the basis of a SHLAA exercise. The community is therefore not able to effectively

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comment on the housing land supply and at this stage the Submission Core Strategy is legally unsound.

That said, we are of the view that the quantum of housing envisaged south of Hockley/Hawkwell should be more than the 175 currently envisage. In coming to this view we have reviewed the Urban Capacity Study and the latest housing figures in the Annual Monitoring Report 2008. We conclude that the shortfall in housing land supply is such that 330 dwellings in this location is appropriate.

The recently published SHLAA is based upon the data obtained from the Urban Capacity Study 2007, a call for sites exercise and data from the Annual Monitoring Report 2008.

The 2007 Urban Capacity Study (UCS)

1. 2007 is widely recognised as being the peak level of house prices in the UK and it was acknowledged by Government and practitioners alike that 2007 house prices were at an unsustainable level. It is our view that utilising the 2007 UCS as an evidence base without reference to the market does not pick up the depressed demand that is likely to now exist. Recent corrections to the housing market now mean that housing land prices are at a much lower and arguably more affordable level than before. The implications are that some pdl may not be viable for housing development. Often brownfield sites have much higher development costs than Greenfield sites and so the yield from urban capacity will be much lower than anticipated in the 2007 study. One example is the employment allocation of the Adopted Local Plan located at 76-92 Main Road, Hawkwell. This site has been allocated for several years and has been available during the most recent rises in residential property prices during 2006-07. As a consequence the lack of progress on the site can only be described by its current occupancy and perhaps it comprises high value uses that do not encourage redevelopment. Despite this the site is identified as having high potential for alternative use and high potential demand. The SHLAA form notes that there is no information on legal constraints (e.g., tenancy agreements) As a consequence it is difficult to see how this could continue to be a potential site and as a consequence the allowance for green field releases should be increased.

2. There are considered to be other instances in the UCS and the recently published SHLAA where the assumptions and calculations would indicate that the 1301 urban capacity figure is over optimistic and the SHLAA assessment is limited. In the assessment of 'non-residential sites in appropriate locations' within the UCS assumptions are made as to the probability of sites coming forward for new housing. 68-72 West Street, Rochford is identified as a high probability site but we note that it has been subject to 7 refusals of planning permission/conservation consent. There is a significant gap between the urban capacity identified as being suitable by the Council and the capacity applied for by the owners. Given its alternate use value, it is debateable whether the two capacity figures can be reconciled. No 247 London Road is another example of a site allocated in the Local Plan but which hasn't come forward. This is now the subject of a proposal for a care home and if approved would further limit the scope for market/affordable housing capacity on the site. A striking example of how the urban capacity study has underestimated is also evidence by 2-4 Alderman's Hill, Hockley - described as a disused service station. There has been no residential development application on this site since 2004 and most recent applications have sought commercial use of the site. Rather than being evidence of housing land deliverability, this particular site evidences the need for commercial uses in the area. There are therefore deliverability doubts over these 'high probability' categories which amount to some 40 units.

3. In relation to the assessment in the UCS entitled 'intensification of existing residential uses' we note that the assessment is premised on an assessment of recent trends taking into account net completions between 2001-2006 and 2005-06. This is effectively an assessment of windfall trends and not an approach that PPS3 encourages. Importantly Table 3-12 in the urban capacity study seeks to project forward urban capacity from residential redevelopment - a period that benefited from high house prices and PPG3 guidance encouraging redevelopment. These two circumstances have markedly changed and so the assumptions and conclusions drawn would also have changed. Even taking into account the UCS discounting, the reliability of the 404 units from this source must be questioned and in our view the 1301 figure cannot be a sound basis for urban capacity and further Greenfield releases are necessary.

4. In the section of the UCS entitled 'subdivision of dwellings' and 'living above the shop' it is estimated that recent trends would result in 7 and 15 units. Our concerns with using trends as a basis for urban capacity are detailed above - PPS3 does not encourage this. Rather, local authorities are charged with surveying their areas, identifying which areas may yield urban capacity and how much and developing policies to achieve that. Government guidance does not encourage the estimation of windfalls in the way the UCS does.

5. Redevelopment of established employment land is a separate section within the UCS. At 1 above we identify the low probability of the Main Road residential allocation coming forward. This remaining section of the UCS considers 11 further employment sites which were first identified in the 2000 UCS. Three of these are considered to have a high probability of coming forward. We have looked at these three sites and can find no evidence that they are likely to come forward. In the 8 years between 2000 and 2008 the three identified high probability employment sites have not been developed and there is no reason to assume that the next 5-10 years will be any different. For example the Rawreth Industrial Estate is identified as being well used in the UCS and although it has some unneighbourly uses there is no indication that the site is available, suitable or deliverable for residential. Land between 39-69 Lower Lambricks, Rayleigh is identified as having a high probability of residential uses. Yet there is no

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evidence of any pre-application advice or planning applications for this area. Stambridge Mills, Mill Lane, Stambridge is a further example. This site is separated from the urban area, in a flood risk zone and protected in the 2006 Replacement Local Plan by Policy EB9 which promotes B1 uses. Against this background there is only two relevant planning applications affecting this area both date from the early 1990's and relate to a plant room and loading bay. There is no evidence that this is likely to come forward for residential purposes in the next 5-10 years.

6. In the UCS extant permissions are identified as 856 dwellings. It is important to note that this figure needs to be continually reassessed so that from the point of adoption of the Core Strategy a 5 and 10 year housing land supply is available. The SHLAA notes extant permissions for 2009-14 being 106. As noted below extant permissions do not necessarily translate into deliverable sites. There is therefore a contingency that needs to be built in. Further allocations on greenfield land need to be increased and as such the quantum of housing in the area south of Hockley/Hawkwell should be increased to 330 dwellings in order to begin to meet the shortfall identified.

The District Council's 5 year housing supply assessment

7. The District Council's Annual Monitoring Report ("AMR") 2008 purports to demonstrate a 5 year housing land supply. The preamble to Table 4.10 in the AMR 2008 explains that Rochford District Council ("RDC") has included units under construction, units with full permission, units with outline permission, units with a resolution to grant, units subject to preapplication discussion/Urban Capacity Assessment and land allocations in its trajectory. The reader is referred to Appendix B which breaks down the sites in more detail. The recently published SHLAA also includes a table showing a potential 1273 dwellings deliverable. However, it refers to "appropriate brownfield sites." Since these 'appropriate sites' are do not

benefit from an application or a planning permission it is difficult to programme them into the housing delivery trajectory.

8. In the full planning permission category of the AMR 2008 where work has not yet started there can be no guarantee that all these sites will be delivered in the 5 years. This comment relates to the one above in relation to the recently published SHLAA. It is not uncommon for permissions to be obtained to provide a means for valuing a site where the owner has no immediate plans to sell the site or develop housing. Delivery may also be hampered by funding constraints, or site assembly problems (where sites are in an alternative use or relocation constraints). Appendix B of the AMR 2008 does not set out the intentions of the landowner or whether the sites are truly achievable in the 5 year period as per PPS3 requirements. The SHLAA purports to show developer intentions at Appendix C but the assessment by the local authority into the legitimacy of some of the claims is not presented. The evidence base is not as full as it should be to demonstrate the robustness of Table 4.6 of the SCS. It is also unclear the extent to which this table is based on either the UCS 2007, AMR 2008, SHLAA 2009 or a combination of all three. This should be set out clearly.

9. In addition, to the 'non delivery' of a proportion of new homes in the AMR 2008, there is concern at the timings of delivery in that data set, for example, 10 units in 2008-2009 relates to outline planning permissions and it is doubtful whether reserved matters can be turned round quick enough to begin delivering housing in this year period. There could well be examples in that set of data where the delivery of units in the first year of the 5 is unlikely, thus delivery is reduced for that period and pushed back and this process is then compounded throughout the data set up to and beyond year 5. Statistical evidence from the Department of Communities and Local Government ("CLG") reveals that building starts are 43% down on the quarter to March 2009 compared with March 2008. It is not clear whether the recently published SHLAA has taken this into account and unless it does the data in the Table at 4.6 of the SCS cannot be relied upon, particularly given the current recessionary circumstances. In relation to the Table at Paragraph 4.6 a refinement is therefore needed to take into account this effect on phasing.

10. This problem is compounded for other units relied upon where permission has been granted but no start on site has been made; this accounts for a considerable number of sites in 2009-10 period (100 dwellings) which is (year 2 of the 5 year period). A delay in these will require more Greenfield sites to be identified in order to meet the shortfall.

11. Finally we note that the East of England Plan expresses its land supply

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requirement as a minimum. This strategy is not reflected in the Submission version of the Core Strategy policy H2.

12. In summary since neither the UCS nor the Annual Monitoring Report form a SHLAA, reservations are maintained about the degree to which sufficient housing land has been identified.

Policy H3

In the Preferred Options Core Strategy 2008 more locations were identified for housing growth in the post 2021 phase. Whilst it is our view that land south of Hockley/Hawkwell should benefit from a greater number of dwellings than the 175 currently identified (330) in order to make the strategy effective. We are concerned at the significant change in strategy between the Preferred Option Core Strategy and the Submission version, which has significantly less housing growth on green field sites. This change in strategy is so significant that we would question whether it is appropriate in the context of soundness and the consultation processes that have taken place so far.

We also have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with other policies in the SCS and feel that Green Belt review should be more explicit throughout the SCS. As it currently stands there is a potential conflict with national policies and limited justification for the Green belt strategy. We note that in Policy H3, which indicates the need for Green Belt land review, the advice is limited and unclear. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H3 and Policy GB1/H2 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary. Not to do so is unsound for justification and effectiveness reasons.

Policy H4 - Affordable Housing

As currently drafted we feel that the policy is not concise enough and that the policy does not reflect current guidance. The phrase 'at least' would indicate that in most cases affordable housing above 35% will be sought. Our understanding is that the 35% figure is recommended in the SHMA and that to provide a policy framework which seeks to go beyond that figure would potentially be unworkable as many sites could not financially bare the burden of over a third of the net developable area not yielding a value. The policy should be redrafted so that "a target of 35% affordable housing shall be provided on all developments of 15 or more units..."

The last policy paragraph provides some scope to relax this policy, if there are clear site constraints that make on site provision impossible. The policy, though, is not particularly clear on what would constitute exceptional circumstances. For example, physical site constraints, which unusually raise development costs, would be one such reason and this should be specified. There may be other reasons including the nature of housing needs in the part of the District the site is located which justify affordable housing below the 35% target. Design reasons may also have a bearing on how provision is made and in what form, particularly if the site is in an historic area where design might override housing need argument. It is therefore recommended that the policy expand on the type of circumstances where affordable housing may be relaxed and the type of information that will be sought of applicant's who have a need to invoke this part of the policy.

Policy H5

In support of the policy, it is advantageous that no percentages requiring a specific mix are included. This flexibility will enable developers and the Council to respond directly to changing circumstances in the local housing market. In the past some authorities have set out a percentage for the type of housing they require only to find that after a few years of strict implementation there is an oversupply of property of that type and no flexibility in the policy to address the problem.

Policy ED2 - London Southend Airport

It is considered that to grow non aviation related employment at a location north of Southend Airport where sustainable access from the rest of Rochford District requires careful consideration. Most Airports are serviced by aviation related employment development and as such a location close to the airport is sensible and sustainable. However, for surface

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access reasons it would be inappropriate to encourage travel from Rochford's main settlements to what essentially would be a rural location for general employment uses. Whilst sustainable access would be improved by a railway station and better bus links, there is no evidence to suggest that a sustainable surface access strategy for non related employment development at the Airport can be achieved. Paragraph 11.22 explains the critical importance of a railway station to the delivery of the strategy yet the Transport Chapter and Implementation Chapter provide neither a policy nor an assessment of deliverability. It is also notable that the South Essex Rapid Transit Policy T4, as set out at paragraph 10.16, notes that Rochford is not proposed to be served but may be served in future phases. This uncertainty is no way to plan for a major employment land supply strategy in the District. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley/Hawkwell, Rochford and Rayleigh is unsound.

Policy ED3

We fully support the first sentence of the Policy and note the apparent contradiction with the statements in Policy H1 and elsewhere which seeks to develop on alternative uses at industrial estates such as Eldon Way.

This contradiction is evidence in the second paragraph of Policy ED3. In our representations on Policy H1 we have explained why it is not sound to diminish the employment stock at Eldon Way and the importance of maintaining a dominance of employment type uses at this estate. These arguments are not repeated here.

We note the sentiments of the third paragraph and in accordance with our representations elsewhere are of the view that this sentence should be revised to explain that Eldon Way will accommodate principally employment type uses. As noted elsewhere uses which are an alternative to employment would diminish this highly sustainable employment site and this is unsound when assessed against National Policy.

Policy ED4 - Future Employment Allocations

In part, the de-allocation strategy is not supported as it is considered unsound when set against sustainability criteria. In relation to the Eldon Way Industrial Estate it is considered critical to the ongoing sustainability of this settlement that employment uses are maintained at this location. It is close to the railway station, bus routes and local residential areas from which the opportunity exists for employees to walk or cycle to work. Its location adjacent to the Town Centre offers opportunity for some retail and leisure development to complement the centre and to maintain a supporting function. These sustainable benefits would not occur with the deallocation of Eldon Way or the significant erosion of its employment floorspace. Whilst redevelopment of the employment site to achieve new employment is supported, the dominant land use should continue to be employment use. As a consequence, the 18ha of land required for employment in this policy is considered to be excessive and the policy should be reviewed to explain that redevelopment of existing employment sites for primarily new employment development will be encouraged.

Policy T4

It is noted that the South Essex Rapid Transit policy, as elaborated upon at paragraph 10.16 notes that Rochford is not served but may be served in future phases. This uncertainty is contrary to the delivery principles of soundness and directly puts at issue the employment land supply strategy in the District which is founded on sustainable access to new sites. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley, Rochford and Rayleigh is unsound.

Appendix H1, CTL1 - Infrastructure

It is recognised that necessary infrastructure provision is an important part of creating a sustainable development and in that context appendix H1 is supported. The supporting text notes that the table at Appendix H1 is not exhaustive and in that context it is very important that the framework properly distinguishes between what should be provided as part of new development schemes and what shouldn't. It is therefore essential that the framework acknowledges the importance of Circular 05/05 and the tests which say that provision of infrastructure and/or contributions should be:

- * Relevant to planning
- * Necessary to make the proposed development acceptable in planning terms
- * Directly related to the proposed development
- * Fairly and reasonably related in scale and kind to the proposed development
- * Reasonable in all other respects

As is made clear (Paragraph B9 of Circular 5/05) contributions should not be used to make good existing deficiencies in infrastructure provision. Nor are they to be used to secure contributions to the achievement of wider planning objectives that are not necessary for consent to be granted. In that context the Core Strategy should set this out as its policy framework.

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Policy GB1 - Green Belt

The objectives of this policy are supported, although as noted in other representations the SCS is unsound as it does not meet the tests in relation to justification, compliance with national policy or effectiveness of strategy.

Policy GB1 mentions the objective to allocate the minimum amount of Green Belt land necessary. The policy should link to the requirements of PPG2 and RSS which are discussed in relation to the representations on Policy H2 and H3. The policy should set out a timeframe for the review and why Rochford requires a Green Belt review (what the exceptional circumstances are in this District that justify a review of local boundaries. The policy should be amended to set out a 2031 time frame and this may require the SCS to have an extended life span beyond 2021.

We would recommend the deletion of the word character since Green Belt designation is not related to landscape character as currently drafted. For clarity we would also recommend that the Policy or its supporting text explain that a Green Belt review will take place in support of an allocations document (paragraph 6.6) in order to identify an appropriate new boundary. This is particularly necessary given the commitment to a Green belt review in the adopted Local Development Scheme.

Policy CLT1 - Planning Obligations and Standard Charges

In view of the need to test fully the basis on which standard charges are based it is important that any document produced is in a development plan document that enables an examination in public. The policy should explain this in order that when the document is produced it accords with Policy and is based on sound evidence.

ENV9 - Code for Sustainable Homes

Object. The advice from the Department of Communities and Local Government is that the new requirement to have a rating against the Code does not make it mandatory to build a Code home or to have each new home assessed against the Code. It does however mean that all buyers of new homes be given clear information about the sustainability of the new home. A house builder can do this in one of two ways:

- they can choose to build a Code home, have that home assessed against the Code and provide the home buyer with a Code certificate stating the star rating the home has achieved
- or, they can choose to build to current building regulations standards, not to pay for an assessment and instead download a nil-rated certificate of non-assessment (also referred to as a nil-rating) to provide to the home buyer.

As such the Rochford policy requirement that coding 3 be achieved by 2010 and Code 6 by 2013 is out of step with Government advice. The policy wording should explain that it is just the coding that is a requirement of new homes and not necessarily that new homes should be constructed to achieve a standard.

The current Government objectives are for the code to be introduced over a reasonable period with development to be code 3 by 2010, code level 4 by 2013 and code level by 2016. In this regard the policy, as drafted, seeks to achieve code 6 by 2013 and consequently compresses the code requirements into a shorter time scale with the costs associated expected to be subsumed within the housing market through higher prices. This is not a realistic strategy for the delivery of sustainable homes and we consider that the policy should be revised to extend the period of compliance but to also make it more flexible based on local circumstances.

Research undertaken on behalf of the Housing Corporation and English Partnerships, published in February 2007 'A cost review of the code for sustainable homes' reveals that code 6 is unlikely to be unattainable given existing technologies and that achieving code 5 could result in a 12% to 20% increase in costs that would have to be passed onto the consumer. Given the variability of the housing market with peaks and troughs, it is unlikely that the housing market would be able to subsume this level of price increase.

The code system policy as currently drafted does not have regard to site circumstances and so many of the requirements could be difficult to meet. For example, micro electricity generation on site may be difficult to achieve where local circumstances deter the capture of wind or solar power. If more expensive technologies are required to generate power than is the norm then costs will rise. There may be other competing reasons why designs cannot include certain sustainability measures if housing sites are in sensitive landscape and historic locations. Alternatively there may be significant development costs associated with site specific circumstances and so viability of the site's development becomes a valid consideration. By insisting on the code for sustainable homes other policy objectives such as affordable housing at particular rates and other contributions may need to be reconsidered. Consequently, we are of the view that this policy should be drafted in a manner which enables site specific circumstances to be taken into account. As noted above the Government explains that the code is a certification requirement and does not necessarily mean that buildings are constructed in accordance with a code level.

It is also important to note that it is not the purpose of planning legislation to duplicate other legislation. In this regard, the policy should accept that the Building Regulations will be the main vehicle for implementing this policy and that unless the coding requires external development then there will be no need to specify what is to be carried out in a planning

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Summary: application.
Policy H5

In support of the policy, it is advantageous that no percentages requiring a specific mix are included. This flexibility will enable developers and the Council to respond directly to changing circumstances in the local housing market. In the past some authorities have set out a percentage for the type of housing they require only to find that after a few years of strict implementation there is an oversupply of property of that type and no flexibility in the policy to address the problem.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 15891 - 14113 - Policy H6 - Lifetime Homes - None

15891 Support

CHAPTER 4 Policy H6 - Lifetime Homes

Respondent: Sanctuary housing association (Miss Sarah Brind) **Agent:** N/A
[14113]

Sanctuary housing association
Collier House
Mead Lane
Hertford
SG13 7UZ
01992 513441

Full Text: We note the requirement for all developments after 2010 to comply and support this generally, although there will be cost implications and the LA will need to support any increase in grant bid levels as a result

Summary: We note the requirement for all developments after 2010 to comply and support this generally, although there will be cost implications and the LA will need to support any increase in grant bid levels as a result

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16179 - 5322 - Policy H6 - Lifetime Homes - i, ii, iii

16179 Object

CHAPTER 4 Policy H6 - Lifetime Homes

Respondent: Pond Chase Nurseries Ltd [5322]

Pond Chase Nurseries Ltd
Folly Lane
Hockley
Essex
SS5 4SR

Agent: Boyer Planning Ltd (Mr R Ricks) [8313]

Boyer Planning Ltd
49 North Hill
Colchester
Essex
CO1 1PY
01206 769018

Full Text: We object to the policy that requires all new housing must meet Lifetime Home standards. We would agree that a percentage of new housing development going forward should achieve such standard but it is unduly onerous to require a 100% provision.

Whilst it is acknowledged that some residents may wish to remain and adapt homes to meet different arising needs that will not be the case for all residents. The Policy is therefore unduly onerous.

Summary: We object to the policy that requires all new housing must meet Lifetime Home standards. We would agree that a percentage of new housing development going forward should achieve such standard but it is unduly onerous to require a 100% provision.

Whilst it is acknowledged that some residents may wish to remain and adapt homes to meet different arising needs that will not be the case for all residents. The Policy is therefore unduly onerous.

Change to Plan Percentage of Lifetime Homes should be reduced to 10%.

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16210 - 9917 - Policy H6 - Lifetime Homes - i, ii, iii

16210 Object

CHAPTER 4 Policy H6 - Lifetime Homes

Respondent: Inner London Group [9917]

Inner London Group
P.O. Box 91
Benfleet,
Essex
SS7 2FF

Agent: Christopher Wickham Associates (Mr C Wickham)
[4961]

Christopher Wickham Associates
35 High Street
Highgate
London
N6 5JT

Full Text: The requirement for all development to meet Lifetime Homes (LH) Standards is unreasonable and unsound, in particular when applied to large housing schemes. In such developments, it is reasonable to provide a proportion of units to LH standards but not all occupiers will require such flexibility.

Summary: The requirement for all development to meet Lifetime Homes (LH) Standards is unreasonable and unsound, in particular when applied to large housing schemes. In such developments, it is reasonable to provide a proportion of units to LH standards but not all occupiers will require such flexibility.

Change to Plan The policy should be modified to require LH standards to be achieved in 20% of new dwellings in larger housing schemes.

Appear at exam? No

Soundness Tests i, ii, iii

Core Strategy Submission Document

16462 Object

CHAPTER 4 Policy H6 - Lifetime Homes

Respondent: Mr S Welsh [7507]

Hanover Land Trust
35 Castle Road
Rayleigh
Essex
SS6 7QD

Agent: N/A

Full Text: We consider the DPD is potentially unsound depending on the final selection of specific sites or site in South West Hullbridge.

Please see attached statements 1, 2, 3 and 4 evidential statement.

The precise wording should correlate to the proposal of the attached statements, although the issue may be resolved by publication of the allocations development plan document.

Oral participation will depend on whether the proposed site is included in the allocation development plan document for specific sites for future development, if the proposed site is included oral participation will not be required or necessary.

Summary: We consider the DPD is potentially unsound depending on the final selection of specific sites or site in South West Hullbridge.

Please see attached statements 1, 2, 3 and 4 evidential statement.

Change to Plan The precise wording should correlate to the proposal of the attached statements, although the issue may be resolved by publication of the allocations development plan document.

Appear at exam? Yes

Soundness Tests ii

Core Strategy Submission Document

O - 16824 - 9676 - Policy H6 - Lifetime Homes - i, ii, iii

16824 Object

CHAPTER 4 Policy H6 - Lifetime Homes

Respondent: Bellway Homes [9676]

Bellway Homes
Bellway House
Bury Street
Ruislip
Middlesex
HA4 7SD
UK

Agent: Barton Willmore LLP (Mr E Hanson) [14266]

Barton Willmore LLP
7 Soho Square
London

W1D 3QB

020 7446 6888

Full Text:

See statement

Council ref AE18 and AE18a

Summary:

See statement

Council ref AE18 and AE18a

Change to Plan

See statement

Council ref AE18 and AE18a

Appear at exam? Yes

Soundness Tests i, ii, iii

Core Strategy Submission Document

16878 Object

CHAPTER 4 Policy H6 - Lifetime Homes

Respondent: Swan Hill Homes Limited [8329]

Swan Hill Homes Limited
C/O Agent
Mr P Kneen
Charles Planning

Agent: Charles Planning Associates Ltd (Mr P Kneen) [5040]

Charles Planning Associates Ltd
1644-1645 Parkway
Solent Business Park
Whiteley
Fareham
Hampshire
PO15 7AH
01489 580853

Full Text:

1.0 Instruction and Introduction

1.1 Charles Planning Associates Limited (Chartered Town Planners) is Instructed by Swan Hill Homes Limited (Swan Hill) to prepare and submit representations on their behalf in respect of the Rochford District Local Development Framework: Core Strategy Submission (September 2009) Development Plan Document.

1.2 The comments refer to the relevant sections and policy designations in the Submission document, as appropriate.

1.3 The comments set out in this submission are intended to assist the District Council in taking forward its Local Development Framework. It is our intention to continue to be involved in the LDF preparation process and we look forward to the opportunity to comment further at the Examination to the Core Strategy.

1.4 If you have any queries regarding the content of this submission then please do not hesitate to contact:

Peter Kneen BSc (Hons) MSc MRTPI
Planner

2.0 Housing:
Policy H1 - The Efficient Use of Land for Housing

2.1 Swan Hill recognises the importance of seeking to concentrate new developments mainly in the existing urban areas, on previously developed land where possible, particularly in view of the Government seeking to ensure 60% of all such new developments are on previously development land (PDL).

2.2 However, given the character of the District, and the strategic housing requirement of the East of England Plan, Swan Hill supports the approach that the Council must also make provision for additional development on the edge of existing settlements on greenfield sites, particularly in the most sustainable locations. As such, Swan Hill supports that where feasible, the redevelopment of existing employment sites for residential/employment purposes can make a contribution towards the strategic housing requirement, provided that sufficient additional employment land is brought forward to ensure the stability of employment levels in the District, and to ensure employment growth meets the East of England Plan requirements.

2.3 Swan Hill considers that Policy H1 should include consideration that new extensions to existing settlements have regard to their potential impact on the wider characteristics and openness objectives of the Green Belt.

Policy H2 - Extensions to Residential Envelopes and Phasing

2.4 Swan Hill generally supports the approach taken by the Council in this policy. As set out above, Swan Hill consider the Council's acknowledgment that housing requirements should be met through the allocation of land on the edge of the existing settlements is the most suitable way forward to meeting the Council's strategic housing requirement and complies with the advice in PPS3.

2.5 The need for suitable greenfield urban extensions represents the best way forward for the Council to meet its strategic housing requirement, as set out in the East of England Plan. Swan Hill supports the recognition that the potential supply of alternative previously developed sites is limited, without detrimentally affecting the character of the District, and therefore the best way forward is the use of sustainable greenfield urban extensions to the existing settlements of the District.

2.6 However, Swan Hill consider that a fundamental consideration that the District Council should consider relates to the potential impact of the urban extensions on the Green Belt policy has been somewhat overlooked. The wider sustainability credentials of the settlements of the District should only be one of many key considerations for determining the level of expansion. In view of the proximity of Southend-on-Sea to all the main settlements of the District, and the influence this has on the likely location many people would travel for employment and leisure, sustainability of many of the settlements is not a key overarching factor, and greater weight should be placed on the potential impact on the openness of the Green Belt, as this cannot be remedied if development occurs in the wrong location.

2.7 As such, Swan Hill considers that determining the location of growth for the main settlements should be to identify

16878 Object

CHAPTER 4 Policy H6 - Lifetime Homes

those locations where the impact on the wider setting of the Green Belt can be minimised. Further justification for those general locations chosen should be identified in Policy H2. In this regard, Swan Hill has serious concerns regarding the removal of Land South West of Great Wakering as a viable option for the growth of the settlement. The development of this area of Great Wakering, in addition to the potential redevelopment of the Star Lane Industrial Estate could provide a more comprehensive development, whilst ensuring that the wider openness of the Green Belt is maintained. Land South West of Great Wakering is significantly better placed to limit the impact on the wider Green Belt than Land West of Great Wakering, and could contribute to the provision of an important amenity and wildlife site for the local community.

2.8 In addition, Swan Hill consider that the Council now has no reserve provision in the event that any of the existing employment sites set out in Policy H1 fail to come forward for development within the envisaged timescale. Further, Land West of Great Wakering has not been identified in the SHLAA as a deliverable site to help meet the strategic housing requirement, contrary to the requirement set out in PPS3.

2.9 As such, Swan Hill would support the provision of suitable sites which could be safeguarded for future development in the likelihood of a shortfall in supply.

Policy H3 - Extensions to Residential Envelopes Post 2021

2.10 As set out above, Swan Hill supports the overall approach the Council has taken towards the provision of sustainable urban extensions as a suitable means of meeting their strategic housing requirement. However, as set out for Policy H2 above, Swan Hill has serious concerns regarding the removal of several proposed sites set out in the October 2008 Preferred Options Core Strategy, without any guarantee of the ability to deliver those sites set out in Policy H1.

2.11 As also considered above, the inclusion of West of Great Wakering for 250 dwellings should not be included ahead of South West of Great Wakering, in view of the fact that the site is not identified in the SHLAA as available, suitable and achievable as required by PPS3, and thus is not supported by a robust and creditable evidence base for its inclusion as a strategic site for development.

2.12 Whilst Swan Hill acknowledge that alterations to Policy H1 has resulted in the removal of some locations for growth in Policy H3 (as set out in the Sustainability Appraisal), Swan Hill does not consider that the most appropriate locations have been chosen.

2.13 In addition to the matters raised above, the use of West of Great Wakering would also result in the loss of valuable agricultural land, which clearly in a Green Belt location, should be less suitable for development than other sites, such as South West of Great Wakering, which would have limited impact on the wider Green Belt policy, and not result in the loss of valuable agricultural land.

2.14 Finally, in respect of Policies H1, H2 and H3, all of the above comments are based on our interpretation of the Submission Version Core Strategy when compared to the October 2008 Version of the Core Strategy. Without the ability to undertake a detailed assessment of the Council's SHLAA, it is not possible to clarify the proposed Core Strategy position regarding the proposed direction of growth proposed for the settlements in the District. As such, Swan Hill reserves the right to make additional representations regarding the proposed Policies H1, H2 and H3 following the publication of the SHLAA in due course.

Policy H4 - Affordable Housing

2.15 In general terms, Swan Hill supports the approach taken by the Council towards the provision of affordable housing for new residential developments. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H5 - Dwelling Types

2.16 Swan Hill supports the policy provision of H5, and considers that the approach taken by the Council for this policy represents a suitably flexible alternative to stipulating percentages of dwelling mix, sought by some local authorities. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H6 - Lifetime Homes

2.17 In regard to this policy, Swan Hill objects to the Council's policy where all new dwellings should be provided to the Lifetime Homes Standard. Whilst it is acknowledged that the UK has an aging population, Swan Hill considers that seeking to provide Lifetime Homes on all sites is considered to be overly onerous for proposed developers, particularly when considering the requirement for all car parking spaces to be suitable for disabled users, which could result in more schemes becoming unviable. Therefore, the provision of a percentage of Lifetime Homes should be considered through negotiations with the Council at the planning application stage, and should be determined on a case-by-case basis.

3.0 Character of Place: Policy CP1 - Design

16878 Object

CHAPTER 4 Policy H6 - Lifetime Homes

3.1 The Town and Country Planning (General Development Procedure) Order 1995 (As Amended) makes the submission of a Design and Access Statement for most types of planning applications a Statutory requirement, and as such, the provision of a Design Brief represents a pre-requisite of all major planning applications.

3.2 Policy CP1 seeks to ensure the provision of good, high quality developments that reflect local characteristics and distinctiveness, this ideology is supported by Swan Hill.

4.0 The Green Belt:
Policy GB1 - Green Belt Protection

4.1 Following the amendments to the wording of the Policy since the October 2008 Preferred Options Core Strategy, Swan Hill is now generally supportive of Policy GB1 and its supporting text. However, as expressed above, it is important that where alterations to the Green Belt boundary occur as a result of the extension of the settlements to meet the strategic housing requirement, both the minimal amount of land is taken and where that land is taken for development, it represents the best available land which has a minimal impact of the wider openness characteristic of the Green Belt.

5.0 Environmental Issues:
Policy ENV3 - Flood Risk

5.1 Swan Hill generally supports the approach set out in Policy ENV3 regarding ensuring development accords with the sequential test of PPS25. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV4 - Sustainable Drainage Systems (SUDS)

5.2 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV4. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV8 - On-site Renewable and Low Carbon Energy Generation

5.3 Whilst Swan Hill recognises the importance of reducing carbon emissions, particularly in new housing developments, and the role this can play in reducing the nations overall Greenhouse emissions. As such Swan Hill is generally supportive of Policy ENV8. It is noted that Policy ENG1 of the East of England Plan sets out a threshold of developments comprising 10 or more dwellings. Swan Hill consider it important for the District Council to justify the reduction in the threshold level.

5.4 Further, no assessment of Policy ENV8 has been set out in the Sustainability Appraisal which justifies the change in threshold from that of Policy ENG1 of the RSS.

Policy ENV9 - Code for Sustainable Homes

5.5 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV9. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

6.0 Community Infrastructure, Leisure and Tourism:
Policy CLT1 - Planning Obligations and Standard Charges

6.1 Swan Hill generally supports the overall approach the Council has taken in Policy CLT1. It is considered Policy CLT1 sets out a degree of flexibility to ensure that all sites are considered on a site-by-site basis, assessing the individual merits of each planning application, in order to ensure the levels of contributions applicable meet the five tests of Circular 05/05. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policies CLT5 - Open Space;
CLT7 - Play Space;
CLT8 - Youth Facilities; and,
CLT10 - Playing Pitches

6.2 Swan Hill supports the need for new residential developments to incorporate a degree of new publicly accessible open space, children's play space, youth facilities and playing pitches, and as such, generally supports the policy approaches taken by the Council.

6.3 However, it is important that whilst the Council may seek to undertake an assessment of providing standard charges for new development, which, as set out in Policy CLT1, this should be based on thorough public consultation and consideration and sound justification. Swan Hill consider that within the provision of a standard charge, it is important that such provision allows for a degree of flexibility to ensure that each site is assessed individually and on its own merits. This is particularly important for those sites close to existing open spaces and facilities. As such, the levels of

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CHAPTER 4 Policy H6 - Lifetime Homes

open space and recreation facilities required in the 'standard charge' should be based on an up-to-date PPG17 Open Space assessment, which should be used to form a key consideration in the levels of provision likely to be required in the standard charge system proposed.

7.0 Transport: Policy T1 - Highways

7.1 Swan Hill supports the overall objectives set out in Policy T1 requiring developments to be located and designed to reduce the reliance on the private car and to meet the infrastructure needs generated by development or seek to help achieve these needs is acceptable in principle.

7.2 Swan Hill recognises the importance of providing sufficient infrastructure provision to meet the requirements of development, and that where developments have insufficient consideration of impact on existing infrastructure, they should be considered unacceptable and contrary to National policy guidance. However, Swan Hill considers it important to emphasise that the developer's role should not be seen as a means to meet existing shortfalls in provision.

Policy T3 - Public Transport

7.3 Swan Hill is generally supportive of the policy approach set out in T3, however, as set out in paragraph 7.2 above, it is important that the District Council do not consider that it is the developer's responsibility to resolve existing shortfalls in provision of public transport, and any contribution towards additional public transportation provision should only be to mitigate against the additional level of demand likely from the development proposed.

Policy T5 - Cycling and Walking

7.4 Swan Hill supports the general approach to this policy, as Swan Hill recognises the importance of promoting the use of alternatives to the private car. The policy provision acknowledges the need to ensure relevant contributions in the event of additional travel demands generated by individual developments, whilst also setting out additional aspirations for the cycle network in the District.

7.5 As such, Swan Hill considers this policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy T8 - Parking Standards

7.6 The Council has recently (January 2007) adopted SPD on the requirements for parking standards, and as such, Swan Hill generally supports the policy approach chosen by the Council. As set out in the SPD, whilst Swan Hill generally supports the approach taken by the District Council towards setting residential parking standards, in that the Council has recognised that in the suburban areas, even with some access to public transport, the majority of residents will rely on the use of private cars. However, Swan Hill has concerns over the failure of the District Council to comply with the provisions of PPG13: Transport (2001) which sets out that Local Planning Authorities should not set minimum standards for car parking. Whilst it is acknowledged that PPS3 sets out provision for the consideration of local circumstances, it is considered that the Council has not justified this deviation from PPG13's maximum standard.

7.7 Whilst it is acknowledged that such justification may become apparent through the work currently being undertaken by Essex County Council, until such time, the District Council should only seek to apply the maximum standards indicated in PPG13. However, Swan Hill recommends that the District Council make provisions in the wording of the Policy to allow for changes in the event that future policy on car parking standards need to reflect the County standard, following the completion of the County Council review.

8.0 Economic Development: Policies ED3 - Existing Employment Land ED4 - Future Employment Allocations

8.1 In respect of Policies ED3 and ED4, Swan Hill notes that they have changed considerably since the October 2008 Preferred Options document, in that they are site specific regarding the location of the proposed redevelopment of existing employment sites. These four sites are also identified in Policy H1 - Efficient Use of Land, and in general, Swan Hill supports the approach to the redevelopment of these sites (where feasible) based on the assessments of the sites set out in this version of the Core Strategy.

8.2 However, Swan Hill has concerns that these policies might not be considered suitably sound given that insufficient opportunity has been allocated for consultation on their redevelopment. Without the SHLAA being publically available prior to the consultation on this Core Strategy, an insufficient evidence base has been provided to corroborate that these sites are neither suitable or deliverable to meet the test of soundness requirements.

Summary:

Policy H6 - Lifetime Homes

2.17 In regard to this policy, Swan Hill objects to the Council's policy where all new dwellings should be provided to the Lifetime Homes Standard. Whilst it is acknowledged that the UK has an aging population, Swan Hill considers that

Core Strategy Submission Document

O - 16878 - 8329 - Policy H6 - Lifetime Homes - ii

16878 Object

CHAPTER 4 Policy H6 - Lifetime Homes

seeking to provide Lifetime Homes on all sites is considered to be overly onerous for proposed developers, particularly when considering the requirement for all car parking spaces to be suitable for disabled users, which could result in more schemes becoming unviable. Therefore, the provision of a percentage of Lifetime Homes should be considered through negotiations with the Council at the planning application stage, and should be determined on a case-by-case basis.

Change to Plan

Appear at exam? Yes

Soundness Tests ii

Core Strategy Submission Document

O - 15702 - 7840 - Policy H7 - Gypsy and Traveller Accommodation - i

15702 Object

CHAPTER 4 Policy H7 - Gypsy and Traveller Accommodation

Respondent: Mrs Jane McClure [7840]

230 Hockley Road
Rayleigh
Essex
SS6 8EU
01268771971

Agent: N/A

Full Text: Gypsies and Travellers are by their very name supposed to move around the country not settle tax free on sites to the detriment of privately bought dwellings.

Local crime is endemic as well as the well being of children in local schools being compromised. Why should they have access to doctors and dentists without paying anything into the tax system like me and millions of hardworking families?

We have seen what has happened in Crays Hill with the destruction of local families, loss of value of their houses with an increase in crime and devastation of local schools.

Summary: Gypsies and Travellers are by their very name supposed to move around the country not settle tax free on sites to the detriment of privately bought dwellings.

Local crime is endemic as well as the well being of children in local schools being compromised. Why should they have access to doctors and dentists without paying anything into the tax system like me and millions of hardworking families?

We have seen what has happened in Crays Hill with the destruction of local families, loss of value of their houses with an increase in crime and devastation of local schools.

Change to Plan If gypsies and travellers want to put down roots by all means go through planning procedures like everyone else and pay into the system.

Local crime is endemic as well as the well being of children in local schools being compromised. Why should they have access to doctors and dentists without paying anything into the tax system like me and millions of hardworking families

Appear at exam? No

Soundness Tests i

Core Strategy Submission Document

S - 15705 - 11729 - Policy H7 - Gypsy and Traveller Accommodation - None

15705 Support

CHAPTER 4 Policy H7 - Gypsy and Traveller Accommodation

Respondent: Mrs Sue Malin [11729]

29 King Henry's Drive, Rochford, Essex
SS4 1HY
United Kingdom
01702541385

Agent: N/A

Full Text: excellent - but is 15 really enough

Summary: excellent - but is 15 really enough

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 15975 - 13441 - Policy H7 - Gypsy and Traveller Accommodation - None

15975 Support

CHAPTER 4 Policy H7 - Gypsy and Traveller Accommodation

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: Welcome recognition of the obligation to provide Gypsy and Traveller accommodation. You should take a view whether implementation of the policy conforms to the single-issue review of the East of England Plan.

Summary: Welcome recognition of the obligation to provide Gypsy and Traveller accommodation. You should take a view whether implementation of the policy conforms to the single-issue review of the East of England Plan.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16089 - 7336 - Policy H7 - Gypsy and Traveller Accommodation - i

16089 Object

CHAPTER 4 Policy H7 - Gypsy and Traveller Accommodation

Respondent: Rayleigh Town Council (Mrs K Cumberland) [7336] **Agent:** N/A

Rayleigh Town Council
The Pavilion
King George V Playing Field
Bull Lane
Rayleigh
Essex
SS6 8JD

01268 741880

Full Text: Where particular traveller sits have been identified as being undesirable on planning grounds (e.g.: highway safety) the temptation to ignore the results of legal process and designate such sites as appropriate simply for administration convenience must be resisted.

Summary: Where particular traveller sits have been identified as being undesirable on planning grounds (e.g.: highway safety) the temptation to ignore the results of legal process and designate such sites as appropriate simply for administration convenience must be resisted.

Change to Plan Therefore policy H7 is considered to be unsound and must be more prescriptive particularly on highway safety grounds.

Appear at exam? No **Soundness Tests** i

Core Strategy Submission Document

O - 16152 - 9823 - Policy H7 - Gypsy and Traveller Accommodation - iii

16152 Object

CHAPTER 4 Policy H7 - Gypsy and Traveller Accommodation

Respondent: mr alistir matthews [9823]

Agent: N/A

telfords farm
chelmsford road
battlesbridge
wickford
SS118TR
uk
01268732069

Full Text: All proposed sites should conform to planning controls .There is a lack of action by the planning department to deal with illegal sites with the hope they may be suitable for regularising .There are suitable sites which should be owned and controlled by the council ,It states that sites will be allocated in the west of the district .Can only mean Rawreth .This site is unsound as the entrance to the A1245 is dangerous as has been stated by the highways authority there have been several near misses .There is an alternative near to fairglen interchange opposite Michelins farm .

Summary: All proposed sites should conform to planning controls .There is a lack of action by the planning department to deal with illegal sites with the hope they may be suitable for regularising .There are suitable sites which should be owned and controlled by the council ,It states that sites will be allocated in the west of the district .Can only mean Rawreth .This site is unsound as the entrance to the A1245 is dangerous as has been stated by the highways authority there have been several near misses .There is an alternative near to fairglen interchange opposite Michelins farm .

Change to Plan The last bullet point should have an additional agreement with highways authorities and other utility companies of the suitability of any proposed sites.

Appear at exam? No

Soundness Tests iii

Core Strategy Submission Document

O - 16222 - 7995 - Policy H7 - Gypsy and Traveller Accommodation - i

16222 Object

CHAPTER 4 Policy H7 - Gypsy and Traveller Accommodation

Respondent: Mr Alan Stone [7995]

180 Rawreth Lane
Rayleigh
Essex
SS6 9RN
United Kingdom
01268 784031

Agent: N/A

Full Text: All proposed sites should conform to planning controls. The planning department are known to be delaying current evictions in the hope they may be suitable for approval .
Where gypsy and traveller sites have already been served eviction notices on planning grounds, highway safety and illegal occupation being cited, the temptation to ignore the results of legal process and designate such sites as appropriate simply for administration convenience must be resisted.
Vehicle entrance and exit movements from an illegal site at the A 1245 dual carriageway for example are dangerous to the occupants and more so to other road users. Local residents have been told that if this site was put forward as a housing development, it would be refused on planning grounds

Summary: Where gypsy and traveller sites have already been served eviction notices on planning grounds, highway safety and illegal occupation being cited, the temptation to ignore the results of legal process and designate such sites as appropriate simply for administration convenience must be resisted. Safety issues must also be examined.

Change to Plan Examine unauthorised sites but where eviction notices have been served these should be enforced.

Appear at exam? No **Soundness Tests** i

Core Strategy Submission Document

O - 16228 - 7995 - Policy H7 - Gypsy and Traveller Accommodation - i, ii, iii

16228 Object

CHAPTER 4 Policy H7 - Gypsy and Traveller Accommodation

Respondent: Mr Alan Stone [7995]

180 Rawreth Lane
Rayleigh
Essex
SS6 9RN
United Kingdom
01268 784031

Agent: N/A

Full Text:

In allocating pitches the Council will examine the potential of current unauthorised sites to meet this need and will consider granting them planning consent subject to advice in Circular 1/2006. Sites will be allocated in the west of the District, where transport links and access to services are better.
UNSOUND due to contradiction in terms. The Council are saying "they will examine the potential of current unauthorised sites" yet on the other hand the statement is that "Sites will be allocated in the west of the District" As there is only one site in the west of the district the councils determination has already been made and presumably no other examinations will be made.

Summary:

Sites allocation: West of the District.
UNSOUND. Contradiction. Council say "they will examine the potential of current unauthorised sites", contradicted by "Sites will be allocated in the WEST of District" With only one site in west, Council's determination has already been made. Presumably no other examinations are envisaged.

Change to Plan

Remove the determination that sites will be allocated in the west of the district

Appear at exam? No

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 16472 - 7342 - Policy H7 - Gypsy and Traveller Accommodation - i

16472 Object

CHAPTER 4 Policy H7 - Gypsy and Traveller Accommodation

Respondent: Rawreth Parish Council (Mrs H Bloomfield) [7342] **Agent:** N/A

Rawreth Parish Council
103 Downhall Park
Way Rayleigh
Essex
SS6 9QZ
01268 631821

Full Text:

LDF - Preferred Options - Rayleigh conurbation.

On behalf of Rawreth Parish Council I confirm that this letter is a formal response of objection to the final draft of Rochford District Councils Core Strategy Preferred Options document.

Firstly, at no time has the Parish of Rawreth been included or mentioned in any "Tier" on page 33 of the document, the criteria for allocation of houses - within the Core Strategy. If it had been included it should have been in Tier 4 and this is, therefore, UNSOUND.

The Parish Council believes that to develop 550 houses in one place within area no: 144, land to the north of London Road and then to add a further 220 to the Rawreth Industrial Estate area will totally destroy the character and rural outlook of Rawreth and surrounding areas. It will destroy the residents' "strong sense of identity within their own settlement" and is, therefore, UNSOUND.

The huge development of 550 houses is totally unacceptable. The land north of London Road is good quality agricultural land which is protected by the Green Belt -GB1 - fulfils all purposes under PPG2 and should be retained as such. Once used for development this land can never be returned to agricultural use, and if you continue to erode into our Green Belt and farmland it will be lost forever.

The Parish Council believe a proportion of the houses required to be built in our area should compliment and enhance Rawreth, cause as little extra congestion to our already heavily overcrowded roads as possible and provide a pleasant environment for those people wishing to move to the area. This particular area is part of the "Gateway to Rochford" and is the "strategic buffer" between Rayleigh and Wickford. Reference is made in the Core Strategy document to "avoiding coalescence" of villages/towns, however a development of this size immediately erodes the buffer between Rayleigh, Rawreth and Wickford, starts coalescence, destroys the rural character of Rawreth and, therefore, is UNSOUND.

The Core Strategy Document details Rochford District Councils priorities and objectives and details how the role of the Core Strategy features in achieving these. In support of the Parish Councils observations and alternative proposals they comment as follows.

Page 5 "Fostering greater community cohesion"

Development of land between Rawreth Lane and north of London Road will not give any community cohesion at all, it will simply be an extension to the west of Rayleigh giving residents no real sense of belonging, they will live within the Parish of Rawreth, yet they will be considered as living in Rayleigh as has been proved with other developments along Rawreth Lane such as Laburnum Way.

Page 12 "Priority 5 Essex roads are safer less congested and everyone has access to essential services"

The roads and infrastructure in the Rawreth area are completely full to capacity. The A127, A1245, A129 London Road, Rawreth Lane and Watery Lane just cannot take any more traffic and the proposed development on land to the north of London Road will increase traffic to a completely unsustainable level. On numerous occasions this year incidents within and on the outskirts of the Parish have brought traffic to a standstill for hours along London Road, Rawreth Lane, Watery Lane/Beeches Road and the Hullbridge Road. It took some residents 1 ¼ hours to proceed along Rawreth Lane and into Hullbridge - a distance of 1 1/2 miles.

The proposed development at the western edge of Hullbridge, which is, in fact, largely in Rawreth would also greatly increase the traffic problems in the area. Rawreth Parish Council understand there would be a proposal to "widen/straighten" Watery Lane/Beeches Road, with a roundabout at the junction with the Hullbridge Road. This is an extremely dangerous junction even at the present time and would become increasingly so. There is also the question of where the traffic would go when it reaches Battlesbridge at the Western end, it cannot possibly cross the Bridge as this is "restricted" and in a Conservation Area, therefore, it would have to turn left and proceed to the A1245 - a very dangerous junction.

Beeches Road/Watery Lane is also shown in the document as a new cyclist route. Surely this is a conflict of interest, a road widening/straightening proposal coupled with a cycle route.

Page 33 "Tier Settlements"

Nowhere in the Core Strategy Document is Rawreth Parish actually mentioned, it features in the "all other settlements tier 4" and is referred to as "land north of London Road Rayleigh" or "West Rayleigh" yet, the housing allocation of 550 dwellings between 2015 and 2021 and the 220 planned for the Rawreth Industrial Estate is the largest that any area is taking. Rawreth Parish currently has 380 dwellings and an electorate of 812, yet the proposed housing figures are set to increase the overall number of dwellings in the Parish by 203%.

Pages 34 to 36 "The efficient use of land for housing" and "Extensions to residential envelopes and phasing"

The Core Strategy Document states that "the Council recognises the importance of making best use of brownfield land" and "whilst the Council acknowledge that the housing requirement stipulated in the East of England Plan is a minimum, it must also be mindful of the need to maintain Green Belt as far as possible" yet the proposed 550 houses on the land

16472 Object

CHAPTER 4 Policy H7 - Gypsy and Traveller Accommodation

north of London Road will all be built on Green Belt land of high agricultural value. The document states that "the Council will direct development to the most sustainable locations on the edge of settlements having regard to:"

"The potential to avoid areas of constraint (such as areas at risk of flooding, sites of ecological importance"

"The historical, agricultural and ecological value of land"

"The potential to create a defensible Green Belt Boundary and

"The avoidance of coalescence with neighbouring settlements"

Yet these key factors all seem to have been ignored when choosing the site to the north of London Road and, therefore, the proposal is UNSOUND. The Parish of Rawreth has a history of flooding, the land in Rawreth Lane will drain into the already overloaded brook system and the Services in the area would be unable to cope with this increase in housing - drains and sewers are already working to capacity. Heavy rain earlier in the year resulted in flooding in Watery Lane and the Rawreth Brook system has been very close to flooding twice already this year. During a meeting between the Parish Council and the Environment Agency we were advised that this situation will worsen with increased housing.

Page 42 "Gypsy and Traveller Accommodation"

This section details the need for an allocation of 15 pitches by 2011, it also states that they "will examine the potential of current unauthorised sites to meet this need" and that "sites will be allocated in the west of the District" The west of the District is in fact Rawreth, but yet again the Parish name has not been detailed. The Parish already has an unauthorised site which is the subject of an enforcement case and although well kept is on the brow of a hill on a main highway with restricted access which Essex County Council have already raised concerns about, this is not a site that should be considered as part of the requirement due to its location, but also, why is the allocation of all 15 pitches being detailed to one area?

Page 43 to 44 "Appendix 1"

Details of all the infrastructure to accompany residential development is listed, yet there are no detailed costs, have these been done? And are these achievable? Large numbers of housing in one area, as stated in the infrastructure requirements, will necessitate a new primary school. County figures suggest that there will be surplus places in Rayleigh schools even with new housing. Obviously these will be in the wrong parts of the town so increasing the risk that an existing school could close. It makes sense to spread the development in smaller sites around the town, avoiding closure and preventing unnecessary provision of a new school.

Page 57 "Strategies, Activities and Actions - The Green Belt"

The document states that "The Council will continue to support the principals of restricting development in the Green Belt, as set out in PPG2 and will preserve the character and openness of the Green Belt" it further states that "a small proportion of the District's Green Belt will have to have its designation reviewed to allow development" The entire development of 550 houses planned for land north of London Road is all on Green Belt land as is the land at Hullbridge, how does this equate to a "small proportion"?

The Councils own Policy GB1- Green Belt Protection states "The Council will allocate the minimum amount of Green Belt land necessary to meet the District's housing and employment needs" and that they will "direct development away from the Green Belt as far as is practicable and will prioritise the protection of the Green Belt land based on how well the land helps achieve the purposes of the Green Belt".

This area of land confirms all 5 purposes of the national PPG2 - Green Belt:-

It prevents the unrestricted sprawl of western Rayleigh

It provides a barrier to prevent the ultimate merging of Rayleigh, Rawreth and Wickford

It assists in safeguarding the countryside from encroachment

It preserves the setting and special character of historic towns

Assists in urban regeneration, by encouraging the recycling of derelict and other urban land

Rawreth Parish Council have observed that there are a number of sites that were put forward in the "Call for Sites" that are pre-used brownfield land in the Green Belt land, and as such would prove beneficial and in their opinion should have been considered for development. Their non-inclusion as "brownfield" sites makes the current proposals

UNSOUND:

Site No; 73 Hambro Nursery a site of approximately 3.93 hectares, coupled with the adjacent site Clovelly, would provide between 200 and 250 houses in an area of approximately 4.85 hectares this area would have good access directly from the A1245 and if expanded north westward to include land up to and around the Village Hall, approximately another 2.08 hectares could produce between 50 and 80 further houses. This area could be accessed either from the slip road (Chelmsford Road) to the south of the Nevendon Garage or from Church Road.

Both of these sites would remove the need for extra traffic along the A129 and Rawreth Lane which are both already operating well over maximum capacity. This development would require a footbridge for pedestrians, cyclists and horses over the A1245.

Rawreth Parish Council believe these proposals would be sensible infill of these areas and would be on "Brownfield" sites where current businesses are not particularly progressive and would not result in the loss of many jobs. Our figures are quite conservative and we believe that if these sites were chosen a much reduced number of houses would need to be built "North of London Road" on Green Belt land.

Phase 2 - With regard to the houses that are proposed for the Northeast corner of Rawreth/Hullbridge, the Parish Council are concerned that any development would cause considerable extra congestion to the immediate roads. We understand that the thoughts are to "straighten" and improve parts of Watery Lane and Beeches Road to provide access to and through Battlesbridge - a conservation area. Recent experience of deep flooding in Watery Lane with the road closed for several days on 3 occasions in the early part of 2009 proves that this proposal is completely unsustainable. The local drainage systems simply cannot take the amount of run-off experienced now and with further development this

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would increase the problem.

If this development is to go ahead, the Parish Council believe that a relief road should be built, from the end of Watery Lane, skirting to the west of the Rayleigh Park Estate, crossing Rawreth Lane at a mini-roundabout and entering a vastly improved A129 at approximately Lower Barn Farm. This would take any necessary traffic in and out of the area efficiently.

The Parish Council further believe that the Michelins Farm site No: 49 would be an ideal site for the Rawreth Industrial Estate. This would adjoin proposed industrial sites within the Basildon District and would provide excellent road and transport links. Rawreth Parish Council also proposed that the land opposite Michelins Farm could be used to re-site the illegal Gypsy/Traveller site that is currently situated on the busy A1245. The land opposite Michelins Farm would not only be a much safer site for Gypsy/Traveller pitches, but the correct use of the land would also ensure the environmental improvement of the site as a whole.

All of the above proposals were submitted to Rochford District Council, but they were not taken into consideration in the final draft resulting in the predominant use of Green Belt land for development, bounded by already congested roads and, therefore, the proposals are UNSOUND.

Summary:

Page 42 "Gypsy and Traveller Accommodation"

This section details the need for an allocation of 15 pitches by 2011, it also states that they "will examine the potential of current unauthorised sites to meet this need" and that "sites will be allocated in the west of the District" The west of the District is in fact Rawreth, but yet again the Parish name has not been detailed. The Parish already has an unauthorised site which is the subject of an enforcement case and although well kept is on the brow of a hill on a main highway with restricted access which Essex County Council have already raised concerns about, this is not a site that should be considered as part of the requirement due to its location, but also, why is the allocation of all 15 pitches being detailed to one area?

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 15703 - 7840 - Appendix H1 - i

15703 Object

CHAPTER 4 Appendix H1

Respondent: Mrs Jane McClure [7840]

230 Hockley Road
Rayleigh
Essex
SS6 8EU
01268771971

Agent: N/A

Full Text: against the overbuilding of Rayleigh - another primary school but no senior school! You knocked down Park School to build more houses - no new senior school though.

I am interested to know where all these children will go to school? Surely town planners should always factor in new senior schools when building thousands of houses.

In all my time in Rayleigh (45 years) only two senior schools have been in existence namely Sweyne and Fitzimarc (although have to admit there was briefly a third one - Park School which you knocked down for more houses). There appears to be no forward planning in your ideas for Rayleigh as the more houses you build, the more primary schools you will need and the more senior schools are required - simply maths I would have thought.

Summary:

People are fed up with every spare blade of grass being build upon. One house knocked down and two/three more in its place - planning laws need to be tightened up as there were originally set up for sounds reasons to prevent over-development of areas and loss of green belt.

Change to Plan

In all my time in Rayleigh (45 years) only two senior schools have been in existence namely Sweyne and Fitzimarc (although have to admit there was briefly a third one - Park School which you knocked down for more houses). There appears to be no forward planning in your ideas for Rayleigh as the more houses you build, the more primary schools you will need and the more senior schools are required - simply maths I would have thought.

Appear at exam? No

Soundness Tests i

Core Strategy Submission Document

O - 15838 - 4951 - Appendix H1 - i, ii, iii

15838 Object

CHAPTER 4 Appendix H1

Respondent: Hockley Residents Association (Mr B Guyett) [4951] **Agent:** N/A

Hockley Residents Association
2 Tonbridge Road
Hockley
Essex
SS5 5HL

Full Text: PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

Summary: PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Change to Plan Evaluate highway improvements required, and their costs, and establish scale of Standard Charges required

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 15905 - 11793 - Appendix H1 - i, ii, iii

15905 Object

CHAPTER 4 Appendix H1

Respondent: Mr Brian Guyett [11793]

2 Tonbridge Road,
Hockley
SS55HL
United Kingdom
07736211248

Agent: N/A

Full Text: PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Summary: PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Change to Plan Revise poliicy

Appear at exam? No

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 15920 - 9936 - Appendix H1 - i, ii, iii

15920 Object

CHAPTER 4 Appendix H1

Respondent: Mr David Grew [9936]

PO Box 2091
Hockley
Essex
SS5 4WR
UK
07740201389

Agent: Mr David Grew [9936]

PO Box 2091
Hockley
Essex
SS5 4WR
UK
07740201389

Full Text: Details of infrastructure improvements are not quantified and do not appear to be adequate, particularly for the more unsustainable locations. No evidence base for infrastructure needs has been provided.

Summary: Details of infrastructure improvements are not quantified and do not appear to be adequate, particularly for the more unsustainable locations. No evidence base for infrastructure needs has been provided.

Change to Plan Infrastructure improvements proposed should be fully justified and quantified which would allow the provision to be monitored.

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16018 - 10324 - Appendix H1 - i, ii, iii

16018 Object

CHAPTER 4 Appendix H1

Respondent: Mrs Jennifer Abbey [10324]

3 Claybrick Avenue
Hockley
Essex
SS5 4PS
UK
07768 542634

Agent: N/A

Full Text: PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

Summary: PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Change to Plan Revise policy

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16072 - 9599 - Appendix H1 - i

16072 Object

CHAPTER 4 Appendix H1

Respondent: Mrs Fiona Jury [9599]

WGDP Ltd
Cross Keys House
22 Queen Street
Salisbury
SP1 3EY

Agent: N/A

Full Text: No evidence base has been provided to support the new infrastructure and services identified to accompany the proposed extensions to the residential envelope.

Summary: No evidence base has been provided to support the new infrastructure and services identified to accompany the proposed extensions to the residential envelope.

Change to Plan The DPD needs to be amended to quantify this level of provision. At present, the document is unsound as the level of provision has not been justified against the capacity of existing facilities and services.

Appear at exam? Yes

Soundness Tests i

Core Strategy Submission Document

O - 16180 - 9816 - Appendix H1 - i, ii, iii

16180 Object

CHAPTER 4 Appendix H1

Respondent: Stuart Tennison [9816]

11 Ely Way
Rayleigh
Essex
SS6 9TR
England

Agent: N/A

Full Text: Not enough detail on proposed infrastructure improvement or costs.

Summary: Not enough detail on proposed infrastructure improvement or costs.

Change to Plan Provide details of proposals and costs.

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16241 - 8065 - Appendix H1 - i

16241 Object

CHAPTER 4 Appendix H1

Respondent: Bull Lane Development Group (Mrs Pamela Watson Jones) [8065] **Agent:** N/A

Bull Lane Development Group
68 Windermere Ave
Hullbridge
Essex
SS5 6JT
U K
01702 232376

Full Text: Infrastructure improvements required needs to be identified to highways improvements by way of costs, and life safety. Cycle paths perceived and projected for Watery Lane Hullbridge on a dangerous road, this has many very heavy lorries going to the sewerage works daily. These arguments should not be used as a good reason for housing. A windy road which floods regularly.

Summary: Infrastructure improvements required needs to be identified to highways improvements by way of costs, and life safety. Cycle paths perceived and projected for Watery Lane Hullbridge on a dangerous road, this has many very heavy lorries going to the sewerage works daily. These arguments should not be used as a good reason for housing. A windy road which floods regularly.

Change to Plan Watery Lane leads into Beeches Road and both should be widened, all along, then perhaps a cycle path will be viable. However once you reach Battlesbridge the cycle path will peter out and there is no safe way to travel to Wickford or South Woodham Ferrers or Rayleigh.

Appear at exam? No **Soundness Tests** i

Core Strategy Submission Document

O - 16251 - 9177 - Appendix H1 - i

16251 Object

CHAPTER 4 Appendix H1

Respondent: Colonnade Land LLP [9177]

Colonnade Land LLP
Fifth Floor
17-19 Maddox Street
London
W15 2QH
020 7255 7490

Agent: Icen Projects Limited (David Churchill) [10057]

Icen Projects Limited
83 Victoria Street
London
SJ1H 0HW

Full Text: ROCHFORD DISTRICT COUNCIL - LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY SUBMISSION
SEPTEMBER 2009

Icen Projects Ltd (Icen) has been instructed by Colonnade Land LLP (Colonnade) to submit representations to the Rochford Local Development Framework Core Strategy Submission (CSS).

a) Overview

It is our conclusion that the CSS is not justified, effective or consistent with national policy, as required by Planning Policy Statement 12: Creating Strong Safe and Prosperous Communities through Local Spatial Planning (PPS12) and is therefore vulnerable to being found unsound by an Inspector through the Examination in Public.

b) Background and Summary

These representations follow those made by Icen on behalf of Colonnade to the Preferred Options Core Strategy, submitted via letter dated 17 December 2008. In this regard, we would request that the Council confirms that the representations made to the Preferred Options Core Strategy will be taken into account alongside the current representations, particularly as there are a number of cross references between the two sets of representations.

It is not considered necessary to reiterate the content of the previous representations, as they were made at the appropriate stage and will be considered by the Planning Inspectorate in due course, but it is inevitable that certain elements will require restating where it is not clear that they have been taken into account in the production of the CSS. For clarity, therefore, Colonnade feel that it is appropriate to clarify the 'in-principle' issues that were raised in the representations to the Preferred Options Core Strategy, recognising that these issues were raised in the context of a wider and more coherent justification made within the representations:

- â€¢ Further cross-referencing of the recommendations made within the evidence base is required;
- â€¢ Greater focus should be placed on promoting Rochford as the principal settlement within the District;
- â€¢ Coombes Farm is the most logical location for residential development abutting the urban area of Rochford and as such warrants recognition as a general location for residential development;
- â€¢ The allocation of Three Ashes Farm for employment generating uses will be pursued;
- â€¢ Recognition that it is not realistic to expect residential allocations to be met mainly on Brownfield sites, nor should the intensification of smaller sites in residential areas be pursued;
- â€¢ Many of the sites identified as suitable for residential development will not be viable and will not come forward for development within the timescales anticipated;
- â€¢ The failure to provide the necessary justification for the proposed infrastructure improvements sought in Appendix H1;
- â€¢ The inclusion of an affordable housing exception policy was sought; and
- â€¢ The need to identify sites capable of delivering employment growth in the short term.

Following assessment of the CSS presented by the Council for consultation prior to submission to the Secretary of State, Colonnade considers the Plan to be 'unsound' as the document consistently fails to meet the tests of soundness set out in the table following Paragraph 4.52 of PPS12. For clarity, PPS12 confirms that to be 'sound' a Core Strategy should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY and defines 'justified' as "founded on a robust and credible evidence base" and "the most appropriate strategy when considered against the reasonable alternatives" and 'effective' as "deliverable", "flexible" and "able to be monitored".

The rationale for the above is identified in the remainder of these representations, which are provided in the interests of ensuring the Council delivers a strong, robust and logical Core Strategy that guides the future development of the District in a justified and effective manner.

b) Colonnade

As the Council is aware from previous submissions to the Local Development Framework, Colonnade is a strategic land company with a particular interest in the future development of the District as a consequence of a number of sites that it controls, particularly around Rochford.

The Council will also be aware that Colonnade has recently submitted an outline planning application for the residential development of the land at Coombes Farm, Rochford to provide a sustainable urban extension comprising up to 326

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residential dwellings, with associated accesses and community uses. Whilst the planning application process is clearly separate from the Local Development Framework production process, Colonnade wishes to continue the promotion of the site as a suitable location for residential development.

Accordingly, these representations focus on the legal requirements and tests of soundness associated principally with the Housing and Employment chapters of the CSS, with reference where appropriate to the sites that are controlled by Colonnade, the outline planning application at Coombes Farm and other issues where relevant.

c) Housing

i. Date of Adoption

The CSS assumes an adoption date of 2010 and plans for the provision of housing to 2025.

Taking account of the potential delays to the adoption of the Plan, including the Examination process, it would be more appropriate for the CSS to provide sufficient flexibility to allow for delays in its adoption. Colonnade considers an adoption date of 2011 for the CSS is a more realistic target.

Taking account of the advice in Paragraph 4.13 of PPS12, which states that the time horizon for the Core Strategy should be "at least 15 years from the date of adoption" it would be appropriate for the CSS to plan for the provision of housing to 2026 at the earliest. As such, Colonnade does not consider the CSS to be 'flexible' in the context of the tests of soundness in the table following Paragraph 4.52 of PPS12.

ii. Housing Delivery

However, setting the above aside, the Housing Chapter identifies the minimum housing delivery target for the period 2001 to 2021 of 4,600 dwellings as set out in the East of England Plan, with the annual average requirement of 250 dwellings per annum to extend provision from 2021 to 2025. It also confirms that the residual target for the period 2006 to 2021 is 3,790 dwellings, taking account of the delivery of 810 dwellings in the period 2001 to 2006, and a further 618 dwellings have been completed between 2006 and 2008.

This leaves a residual housing provision target of a minimum of 3,172 dwellings in the period 2008 to 2021. Taking into account the required provision beyond 2021, the residual housing provision target in the period 2008 to 2025 is a minimum of 4,172 dwellings. The disparity between these figures and those provided within the CSS are explained by the rounding down of the annual average delivery requirement in the period 2006 to 2021 to 250 dwellings per annum, compared with the actual figure of 252.67.

The table at Paragraph 4.6 of the CSS identifies the source of housing provision that will meet the identified minimum requirements and includes figures for 'Extant Planning Permissions' and 'Existing allocations/other appropriate sites identified in Strategic Housing Land Availability Assessment'. These figures, along with the actual completions within the period are combined to produce the figure for the 'Total without Green Belt release' figure.

Setting aside the concern regarding under-provision associated with the rounding down of the annual average delivery requirement in the period 2006 to 2021, the CSS fails to identify the sites that will contribute to the 'Extant Planning Permissions' provision. The identification of the sites that will contribute to the 'Extant Planning Permissions' should be provided in the context of the findings of the Inspector in the appeal by Asprey Homes [APP/G5180/A/07/2043219/NWF] who determined that the reliance on a delivery rate of 100% is unsafe [IR287].

Furthermore, at the time of writing these representations, the Strategic Housing Land Availability Assessment 2009 has not been published. It is impossible therefore for a full assessment of the proposed housing provision to be undertaken to confirm whether the CSS is 'founded on a robust and credible evidence base' [test of soundness in the table following Paragraph 4.52 of PPS12].

iii. Redevelopment of Employment Sites

Paragraph 4.14 of the CSS refers to the identification of the four employment sites that are considered by the Council to be suitable for redevelopment to residential use. However, the failure to publish the Strategic Housing Land Availability Assessment 2009 either before or alongside the publication of the CSS means that the assumptions made by the Council as to the suitability, availability, viability and deliverability of the sites cannot be assessed.

It has been necessary, therefore, to review the assumptions made in the Rochford Urban Capacity Study 2007 (UCS) regarding the sites. Within the section of the UCS entitled 'Redevelopment of Established Employment Land' [pages 22 & 23] includes a list of those sites assessed, their indicative capacities and the probability of residential development coming forward at the sites within the plan period (identified elsewhere as 2001 - 2021). The list includes the four sites identified in the CSS of Eldon Way/Foundry Estate, Hockley; Rawreth Lane Industrial Estate, Rayleigh; Stambridge Mills; and Star Lane Industrial Estate, Great Wakering.

In total, the UCS identifies an indicative residential redevelopment capacity of 486 units on the four sites (118, 220, 60 and 88 respectively). Of these, it identifies the Rawreth Lane Industrial Estate and Stambridge Mills as having a 'high'

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probability of coming forward for development in the Plan period (2001 - 2021), which would deliver 280 residential dwellings using the Council's own figures. The Star Lane Industrial Estate (referred to in the UCS as the Star Lane Brickworks) is identified as having a 'medium' probability of coming forward for development in the Plan period, with capacity to deliver 88 residential dwellings. It is unclear, therefore, where the figure for 'Existing allocations/other appropriate sites identified in Strategic Housing Land Availability Assessment'.

Set against this is the identification of these four sites in the CSS as being capable of delivery for residential development within the Plan period, with 671 units delivered between 2006 and 2015 and a further 506 units between 2015 and 2021.

The UCS also states in the same section that:

"There are considerable areas of land in the district that are currently allocated for, and in use as, employment land. The redevelopment of such sites for residential use would reduce demand for residential development on greenfield sites, but would at the same time create a need for alternative sites to be found for employment. Such an approach, which would be likely to require the decontamination of existing employment land to make it fit for residential use, together with development of a greenfield site and implementation of additional infrastructure to serve the new employment area, may well be unsustainable." [our emphasis]

The UCS appears to confirm therefore, that not only would the redevelopment of the four sites listed in the CSS be unlikely within the Plan period, but also potentially unsustainable. In this regard, it is notable that the promoters of Stambridge Mills sought the Screening Opinion of the Council as to whether Environmental Impact Assessment of the planning application for the redevelopment of the site for residential use was required in 2007, but to date are yet to submit a planning application for the redevelopment of the site.

In light of this, Colonnade does not consider the CSS is 'the most appropriate strategy when considered against the reasonable alternatives' [test of soundness in the table following Paragraph 4.52 of PPS12], which include the provision of residential development in East Rochford.

iv. Strategic Housing Growth to the East of Rochford

Furthermore, whilst paragraph 2.62 of the CSS identifies concern relating to the identification of locations to the east of Rochford for development on the basis that 'vehicular movements would inevitably be directed through Rochford's historic core', the CSS later identifies Stambridge Mills as a suitable site for residential redevelopment.

In light of the evident conflicts between the evidence base provided in support of the CSS and the absence of other evidence, the CSS is not considered 'sound' in the context of the tests of soundness in the table following Paragraph 4.52 of PPS12.

v. Housing Trajectory

Paragraph 4.28 of the CSS confirms that policies H1, H2 and H3 of the CSS will deliver housing supply as illustrated in the Housing Trajectory at Appendix H2. This Housing Trajectory is transposed from the 2008 Annual Monitoring Report (AMR).

Whilst on the face of it, the Housing Trajectory appears to confirm that the Council can meet its requirement to identify a five year housing supply, many of the sites identified within the AMR do not conform to the guidance issued by CLG in August 2008, on the assessment of a five year land supply. The guidance identifies sites that can be included within the five year assessment of housing supply as:

"those that are allocated for housing in the Development Plan, sites that have planning permission (outline or full planning permission that has not been implemented) and specific, unallocated brownfield sites that have the potential to make a significant contribution to housing delivery during the 5 year period".

Table 4.10: Projected Net Completions of the AMR confirms that the five year housing land supply figure includes sites from 'other land allocated for residential purposes', which are based on land allocations outside existing settlements. However, it should be clarified that these land allocations are not currently allocated for housing development in an adopted Development Plan. As such, these unallocated greenfield sites that are yet to make significant progress through the planning system should be discounted and the five year housing land supply recalculated.

The table below has been prepared to confirm the extent of the shortfall should the sites from 'other land allocated for residential purposes' be removed from the calculation of the Rochford five year housing land supply, in accordance with the guidance issued by CLG:

Recalculated Five Year Housing Land Supply (2009 - 2014):

Year
1st April 2009 to 31st March 2010
Predicted Delivery (A)

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106 dwellings
Allocations on 'other land allocated for residential purposes' (B)
0
Residual delivery (A-B)
106 dwellings
Delivery Shortfall
0

Year
1st April 2010 to 31st March 2011
Predicted Delivery (A)
217 dwellings
Allocations on 'other land allocated for residential purposes' (B)
150
Residual delivery (A-B)
67 dwellings
Delivery Shortfall
150

Year
1st April 2011 to 31st March 2012
Predicted Delivery (A)
544 dwellings
Allocations on 'other land allocated for residential purposes' (B)
300
Residual delivery (A-B)
244 dwellings
Delivery Shortfall
300

Year
1st April 2012 to 31st March 2013
Predicted Delivery (A)
395 dwellings
Allocations on 'other land allocated for residential purposes' (B)
375
Residual delivery (A-B)
20 dwellings
Delivery Shortfall
375

Year
1st April 2013 to 31st March 2014
Predicted Delivery (A)
300 dwellings
Allocations on 'other land allocated for residential purposes' (B)
300
Residual delivery (A-B)
0 dwellings
Delivery Shortfall
300

TOTAL

Predicted Delivery (A)
1,562 dwellings

Allocations on 'other land allocated for residential purposes' (B)
1,125 dwellings

Residual delivery (A-B)
437 dwellings

Delivery Shortfall
1,125 dwellings

The above table confirms that the removal of the 'other land allocated for residential purposes' from the calculation of the Rochford five year housing land supply leaves the Council with a minimum net additional housing delivery of 437 dwellings, which equates to a supply of 1.7 years based on the adjusted annual delivery target of a minimum of 255 net

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additional dwellings per annum. As such, the Council is failing to meet its requirement to demonstrate a five year housing land supply in accordance with PPS3 and the supporting guidance provided by CLG. It is notable that the recent application by David Wilson Homes at Land between Main Road and Rectory Road and Clements Hall Way, Hawkwell identifies an even greater shortfall in the Council's five year housing land supply.

In addition to the above, the AMR does not include a commentary on how deliverability has been assessed against the requirements of paragraph 54 of PPS3.

Furthermore, the guidance from CLG confirms that the windfall sites cannot be relied upon in demonstrating a five year supply unless a Local Planning Authority can demonstrate genuine local circumstances exist to allow this exception. However, the second paragraph of the section entitled 'Housing Trajectory and Five Year Housing Supply' confirms that the estimated completions in the years 2008 to 2013 includes estimated yields through 'intensification' coming forward in future years. With reference to the definition of 'intensification' on page 13 of the AMR, it appears that the 'Housing Trajectory and Five Year Housing Supply' also includes provision for windfall sites. As such, the Council is required to demonstrate the 'genuine local circumstances exist to allow this exception'.

The pressures on delivery and need for additional sites are more acute when it is considered that an average delivery rate of 204 dwellings per annum was achieved during a strong period of housing market growth. In view of the current economic downturn, and significant problems faced within the housing market, the Council should seek to identify appropriate and deliverable sites to meet its regional housing target provision commitments. Suitable sites would include Coombes Farm, which has been positively promoted for development through the LDF process.

It may, therefore, be more appropriate for the Council not merely to allocate sufficient sites to meet the minimum targets set down by the East of England Plan, but to identify a reservoir of land capable of coming forward for development should the sites identified through the CSS and Allocations Development Plan Documents (DPD) fail to come forward for development within the anticipated timescales.

vi. Appendix H1

As set out in the representations to the Preferred Options Core Strategy, there is continuing concern that the list of improvements to infrastructure required in support of residential development as set out in Appendix H1 fails to provide the necessary justification for its inclusion. Whilst the preamble seeks to clarify why the infrastructure is sought, the inclusion of this list should be fully justified, otherwise it is of little value. Furthermore, it would be of benefit to provide further details of the existing community infrastructure provision and capacity within the evidence base.

The failure to provide the necessary justification for its inclusion means that the CSS will not be 'founded on a robust and credible evidence base' [test of soundness in the table following Paragraph 4.52 of PPS12].

d) Character of Place

As set out in the representations to the Preferred Options Core Strategy, Colonnade considers that, with respect to the requirement to produce and adhere to Development Briefs for large residential developments, as set out in Policy CP1, the Council should not seek to impose further demands on developers where existing regulations provide sufficient requirements regarding design. In this instance, Design and Access Statements provide sufficient design guidelines for developments and there is no additional information provided in the policy or supporting text that clearly sets out the justification for this requirement.

e) Green Belt

With reference to the comments regarding the redevelopment of employment sites under the 'Housing' section above and the requirement to allocate sufficient land to meet the minimum housing provision targets as required by the East of England Plan, Colonnade considers that the chapter on Green Belt, and policy GB1 in particular, fails to provide the necessary evidence base that will allow it to be monitored effectively.

It is inherent that the proposed redevelopment of previously developed employment sites for residential use in order to reduce the requirement to allocate previously undeveloped land for residential use will displace these employment uses. In turn, therefore, the separate allocation of previously undeveloped Green Belt to accommodate the compensatory employment provision is required. This is accepted in principle at paragraph 11.11 of the CSS.

Without providing clarification of the anticipated quantum of land required to accommodate the provision of housing and compensatory and new employment land, it is not possible to monitor the performance of policy GB1.

However, using the Council's figures in the table setting out the breakdown of the housing provision figures in Chapter 4 of the CSS (assuming that actual completions and extant permissions are all on previously developed land), setting aside the displacement of employment uses referred to above, approximately 42% of the required minimum housing provision target is capable of being accommodated on previously developed land (2,005 units from a total of 4,750). As such, the Council is required to provide at least 58% of the required minimum housing provision target on the Green Belt (2,745 units from a total of 4,750).

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If these figures are adjusted to take account of the displacement of employment uses (assuming the provision of an equal quantity of land is required to compensate for the employment land that is redeveloped), this figure changes to 17.5% on previously developed land and 82.5% on Green Belt (828 and 3,922 units from a total of 4,750 respectively). Even allowing for the achievement of higher densities of employment on new developments, the figures above are unlikely to change significantly.

Furthermore, the table in Chapter 4 also confirms that no previously developed land will be available for development beyond 2021, or 2015 if account is taken of the displacement of the employment uses.

In light of this, not only does Chapter 6 fail to provide the necessary evidence base that will allow it to be monitored effectively, it is also necessary to consider whether it presents the most appropriate strategy for addressing the required release of Green Belt land to accommodate the defined housing and employment delivery targets to 2025 and beyond as necessary. Colonnade considers a more robust approach that is flexible and capable of being monitored, would be to clearly identify those sites capable of delivery in the short term, which for the avoidance of doubt includes those sites being promoted by Colonnade, with a reservoir of alternative sites set aside for future growth.

As set out in the representations to the Preferred Options Core Strategy, Colonnade considers that the inclusion of an affordable housing exception policy within the CSS will aid the delivery of community housing within rural areas. However, the CSS does not contain such a policy, or adequately address the issue of community housing within rural areas and the CSS is not considered to provide sufficient flexibility to allow for the delivery of essential rural housing.

f) Environmental Issues

Colonnade has concerns regarding the justification for and effectiveness of a number of the policies contained within the Environmental Issues chapter, as follows:

â€¢ Policy ENV1: The Council fails to identify how it will "maintain, restore and enhance" the sites of nature conservation importance that are identified, or how the performance of this policy will be monitored;

â€¢ Policy ENV3: In the context of the advice at paragraph 4.32 of PPS12 regarding the reformulation of national policies, Colonnade does not consider that this policy is required; and

â€¢ Policy ENV9: As set out in the representations to the Preferred Options Core Strategy, Colonnade does not consider that the necessary evidence base has been provided to justify a policy that seeks to go above and beyond the policy targets for the Code for Sustainable Homes as set out by Central Government.

g) Community Infrastructure, Leisure and Tourism

Policy CLT1 refers to the requirement for residential and employment development to contribute to the infrastructure identified in Appendix CLT1 through Standard Charges.

However, whilst the general principle of securing planning obligations through the application of standard charges is broadly accepted, the list of infrastructure requirements set out in Appendix CLT1 is not supported by sufficient evidence base to identify its robustness and credibility. As such, Colonnade does not consider either policy CLT1 or Appendix CLT1 is justified in the context of PPS12.

It is also noted that, despite the clarification sought by Colonnade at the Core Strategy Preferred Options stage, the CSS fails to confirm what information should be contained within Health Impact Assessments, which are required by policy CLT4. Once again, Colonnade requests further clarification of what is involved in the assessment and the expected outputs, which will provide greater clarity and will allow the policy to be monitored.

h) Transport

Policy T8 confirms that the Council will apply minimum parking standards. As set out in the representations to the Preferred Options Core Strategy, the guidance in Planning Policy Guidance Note 13: Transport (PPG13) is clear regarding the imposition of parking standards.

Paragraphs 52-56 of PPG13 confirm that the Local Planning Authorities should apply maximum not minimum parking standards. In order to satisfy the legal requirements set out in PPS12, the policy must reflect PPG13 to promote sustainable transport choices and further provide incentives for developers to locate further residential land closer to local service centres by requiring maximum parking standards for residential developments.

i) Economic Development

As set out in the representations to the Preferred Options Core Strategy, the land at Three Ashes Farm provides an excellent opportunity to deliver employment growth in the short term and may be a suitable site for the 'Eco-Innovation Centre' that is being promoted by the Council. Its identification as a suitable location for strategic employment growth, or the provision of an Eco-Innovation Centre, would accord with the general principles of the policies contained within Chapter 11.

Core Strategy Submission Document

16251 Object

CHAPTER 4 Appendix H1

The identification of Purdeys Industrial Estate as fit for purpose (in paragraph 11.32 and the Council's 2008 Employment Land Study 2008) and therefore it should be maintained and if possible expanded, is welcomed and Colonnade considers that Three Ashes Farm could deliver this expansion, providing a natural extension to Purdeys Industrial Estate and being strategically located close to the Airport.

Three Ashes would address the negative impacts that the nearby residential area experiences from the existing Industrial Estate by providing a buffer between established uses and the residential area with less intensive employment activities. The highways analysis that has been carried out has suggested that it would not have an adverse impact on roads and congestion. Furthermore, there are very few opportunities for businesses to expand and Three Ashes could provide this opportunity.

j) Conclusions

Following the submission of representations to the Preferred Options Core Strategy, Colonnade is disappointed to note that the CSS fails to take account of the majority of the issues raised in their representations.

In addition, Colonnade considers the plan to be 'unsound' as the document consistently fails to meet the tests of soundness set out in the table following Paragraph 4.52 of PPS12 and respectfully requests that the Council notifies Icen, on behalf of Colonnade, of the future arrangements for the Examination of the Core Strategy. Furthermore, Colonnade wishes to take this opportunity to formally register a request to appear at all stages of the Examination in Public, including the pre-hearing meeting and any planned hearing sessions whereby issues raised in the context of this letter are to be discussed. Please confirm this request, and that the representations made to the Preferred Options Core Strategy will be taken into account alongside the current representations, by way of return to this letter.

Icen Projects, on behalf of Colonnade Land LLP trusts that the Council will find these representations to be constructive and helpful in taking forward the Core Strategy. Should you wish to discuss any aspect of these representations further, please do not hesitate to contact us.

Summary:

vi. Appendix H1

As set out in the representations to the Preferred Options Core Strategy, there is continuing concern that the list of improvements to infrastructure required in support of residential development as set out in Appendix H1 fails to provide the necessary justification for its inclusion. Whilst the preamble seeks to clarify why the infrastructure is sought, the inclusion of this list should be fully justified, otherwise it is of little value. Furthermore, it would be of benefit to provide further details of the existing community infrastructure provision and capacity within the evidence base.

The failure to provide the necessary justification for its inclusion means that the CSS will not be 'founded on a robust and credible evidence base' [test of soundness in the table following Paragraph 4.52 of PPS12].

Change to Plan

Appear at exam?	Yes	Soundness Tests	i
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Core Strategy Submission Document

O - 16287 - 12098 - Appendix H1 - i

16287 Object

CHAPTER 4 Appendix H1

Respondent: Mr David Dare [12098]

1, Woodstock Crescent
Hockley Essex
SS5 4XG
UK
01702 205813

Agent: N/A

Full Text: Highway & Traffic Implications

1. Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;

* (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

* EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

3. RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local

16287 Object

CHAPTER 4 Appendix H1

Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

Summary:

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:

* The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

* The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

Previous consultations ignored by RDC:

The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

16287 Object

CHAPTER 4 Appendix H1

Thus the proposals are not founded on a robust and credible evidence base and are unsound

7. RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

* The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

* the Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!

* The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Summary:

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

the Foundry Industrial Estate has never even been previously mentioned;

The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

9. PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

10. THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food

16287 Object

CHAPTER 4 Appendix H1

shopping expenditure.

2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's

existing strengths, rather than retail expansion"

4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moveover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Summary:

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

16305 Object

CHAPTER 4 Appendix H1

Respondent: Mr D Himsley [14206]

4 Brackendale Close
Hockley
Essex
SS5 5AP

Agent: N/A

Full Text: Please find the following objections: -

10 off Unsound Reasons.
1. Highway and Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

3. RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:
The Hockley Parish Plan (dated 2007). The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

7. RDC not consulted on proposals to relocate the Eldon Way and Foundry Industrial Estates

EW; CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" absolutely no consultation on concept of moving EW businesses entirely

FIE; has never even been previously mentioned in any plan version; CS states omission was due to typing error!

Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus proposals are not founded on a robust and credible evidence base and are unsound.

8. The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

Core Strategy Submission Document

16305 Object

CHAPTER 4 Appendix H1

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound

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Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which

does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise

residents how such changes will be made and the strategy is unsound.

10. The CS misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The CS states "The R&LS states Hockley has great potential and has a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) "does not lend itself to a food store capable of retaining a significant proportion of main food shopping expenditure.
- 2) "there is no immediate capacity for additional floor space."
- 3) "recommend that focus be maintained on developing Hockley's existing strengths."
- 4) " the Council may wish to consider reclassifying Hockley from a town center, to a district center".

Summary:

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

S - 16372 - 8267 - Appendix H1 - None

16372 Support

CHAPTER 4 Appendix H1

Respondent: Aber Ltd [8267]

Aber Ltd
C/o Agent

Agent: Colliers CRE (Mr S Chapman) [8266]

Colliers CRE
9 Marylebone Lane
London
W1U 1HL
020 7344 6533

Full Text: South East Ashingdon

Agree with the new infrastructure and services to accompany residential development on this site.

Summary: South East Ashingdon

Agree with the new infrastructure and services to accompany residential development on this site.

Change to Plan N/A

Appear at exam? No

Soundness Tests N/A

Core Strategy Submission Document

O - 16443 - 14218 - Appendix H1 - iii

16443 Object

CHAPTER 4 Appendix H1

Respondent: Barbara Havey [14218]

71 Main Road
Hockley
Essex
SS5 4RG

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.
â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound
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The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is

16443 Object

CHAPTER 4 Appendix H1

also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Summary:

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The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

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SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

Previous consultations ignored by RDC:

â€¢ The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

â€¢ The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

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Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates
â€¢ The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely
â€¢ the Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!
â€¢ The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Summary:

16443 Object

CHAPTER 4 Appendix H1

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates
â€¢ The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely
â€¢ the Foundry Industrial Estate has never even been previously mentioned;
â€¢ The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.
 - 2) (10.28) "There is no immediate capacity for additional floor space."
 - 3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion"
 - 4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".
- The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Summary:

Summary:

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

Core Strategy Submission Document

16443 Object

CHAPTER 4 Appendix H1

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Change to Plan

Appear at exam?	Not Specified	Soundness Tests	iii
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Core Strategy Submission Document

O - 16463 - 7507 - Appendix H1 - ii

16463 Object

CHAPTER 4 Appendix H1

Respondent: Mr S Welsh [7507]

Hanover Land Trust
35 Castle Road
Rayleigh
Essex
SS6 7QD

Agent: N/A

Full Text: We consider the DPD is potentially unsound depending on the final selection of specific sites or site in South West Hullbridge.

Please see attached statements 1, 2, 3 and 4 evidential statement.

The precise wording should correlate to the proposal of the attached statements, although the issue may be resolved by publication of the allocations development plan document.

Oral participation will depend on whether the proposed site is included in the allocation development plan document for specific sites for future development, if the proposed site is included oral participation will not be required or necessary.

Summary: We consider the DPD is potentially unsound depending on the final selection of specific sites or site in South West Hullbridge.

Please see attached statements 1, 2, 3 and 4 evidential statement.

Change to Plan The precise wording should correlate to the proposal of the attached statements, although the issue may be resolved by publication of the allocations development plan document.

Appear at exam? Yes

Soundness Tests ii

Core Strategy Submission Document

O - 16473 - 7342 - Appendix H1 - i

16473 Object

CHAPTER 4 Appendix H1

Respondent: Rawreth Parish Council (Mrs H Bloomfield) [7342] **Agent:** N/A

Rawreth Parish Council
103 Downhall Park
Way Rayleigh
Essex
SS6 9QZ
01268 631821

Full Text:

LDF - Preferred Options - Rayleigh conurbation.

On behalf of Rawreth Parish Council I confirm that this letter is a formal response of objection to the final draft of Rochford District Councils Core Strategy Preferred Options document.

Firstly, at no time has the Parish of Rawreth been included or mentioned in any "Tier" on page 33 of the document, the criteria for allocation of houses - within the Core Strategy. If it had been included it should have been in Tier 4 and this is, therefore, UNSOUND.

The Parish Council believes that to develop 550 houses in one place within area no: 144, land to the north of London Road and then to add a further 220 to the Rawreth Industrial Estate area will totally destroy the character and rural outlook of Rawreth and surrounding areas. It will destroy the residents' "strong sense of identity within their own settlement" and is, therefore, UNSOUND.

The huge development of 550 houses is totally unacceptable. The land north of London Road is good quality agricultural land which is protected by the Green Belt -GB1 - fulfils all purposes under PPG2 and should be retained as such. Once used for development this land can never be returned to agricultural use, and if you continue to erode into our Green Belt and farmland it will be lost forever.

The Parish Council believe a proportion of the houses required to be built in our area should compliment and enhance Rawreth, cause as little extra congestion to our already heavily overcrowded roads as possible and provide a pleasant environment for those people wishing to move to the area. This particular area is part of the "Gateway to Rochford" and is the "strategic buffer" between Rayleigh and Wickford. Reference is made in the Core Strategy document to "avoiding coalescence" of villages/towns, however a development of this size immediately erodes the buffer between Rayleigh, Rawreth and Wickford, starts coalescence, destroys the rural character of Rawreth and, therefore, is UNSOUND.

The Core Strategy Document details Rochford District Councils priorities and objectives and details how the role of the Core Strategy features in achieving these. In support of the Parish Councils observations and alternative proposals they comment as follows.

Page 5 "Fostering greater community cohesion"

Development of land between Rawreth Lane and north of London Road will not give any community cohesion at all, it will simply be an extension to the west of Rayleigh giving residents no real sense of belonging, they will live within the Parish of Rawreth, yet they will be considered as living in Rayleigh as has been proved with other developments along Rawreth Lane such as Laburnum Way.

Page 12 "Priority 5 Essex roads are safer less congested and everyone has access to essential services"

The roads and infrastructure in the Rawreth area are completely full to capacity. The A127, A1245, A129 London Road, Rawreth Lane and Watery Lane just cannot take any more traffic and the proposed development on land to the north of London Road will increase traffic to a completely unsustainable level. On numerous occasions this year incidents within and on the outskirts of the Parish have brought traffic to a standstill for hours along London Road, Rawreth Lane, Watery Lane/Beeches Road and the Hullbridge Road. It took some residents 1 1/4 hours to proceed along Rawreth Lane and into Hullbridge - a distance of 1 1/2 miles.

The proposed development at the western edge of Hullbridge, which is, in fact, largely in Rawreth would also greatly increase the traffic problems in the area. Rawreth Parish Council understand there would be a proposal to "widen/straighten" Watery Lane/Beeches Road, with a roundabout at the junction with the Hullbridge Road. This is an extremely dangerous junction even at the present time and would become increasingly so. There is also the question of where the traffic would go when it reaches Battlesbridge at the Western end, it cannot possibly cross the Bridge as this is "restricted" and in a Conservation Area, therefore, it would have to turn left and proceed to the A1245 - a very dangerous junction.

Beeches Road/Watery Lane is also shown in the document as a new cyclist route. Surely this is a conflict of interest, a road widening/straightening proposal coupled with a cycle route.

Page 33 "Tier Settlements"

Nowhere in the Core Strategy Document is Rawreth Parish actually mentioned, it features in the "all other settlements tier 4" and is referred to as "land north of London Road Rayleigh" or "West Rayleigh" yet, the housing allocation of 550 dwellings between 2015 and 2021 and the 220 planned for the Rawreth Industrial Estate is the largest that any area is taking. Rawreth Parish currently has 380 dwellings and an electorate of 812, yet the proposed housing figures are set to increase the overall number of dwellings in the Parish by 203%.

Pages 34 to 36 "The efficient use of land for housing" and "Extensions to residential envelopes and phasing"

The Core Strategy Document states that "the Council recognises the importance of making best use of brownfield land" and "whilst the Council acknowledge that the housing requirement stipulated in the East of England Plan is a minimum, it must also be mindful of the need to maintain Green Belt as far as possible" yet the proposed 550 houses on the land

16473 Object

CHAPTER 4 Appendix H1

north of London Road will all be built on Green Belt land of high agricultural value. The document states that "the Council will direct development to the most sustainable locations on the edge of settlements having regard to:"

"The potential to avoid areas of constraint (such as areas at risk of flooding, sites of ecological importance"

"The historical, agricultural and ecological value of land"

"The potential to create a defensible Green Belt Boundary and

"The avoidance of coalescence with neighbouring settlements"

Yet these key factors all seem to have been ignored when choosing the site to the north of London Road and, therefore, the proposal is UNSOUND. The Parish of Rawreth has a history of flooding, the land in Rawreth Lane will drain into the already overloaded brook system and the Services in the area would be unable to cope with this increase in housing - drains and sewers are already working to capacity. Heavy rain earlier in the year resulted in flooding in Watery Lane and the Rawreth Brook system has been very close to flooding twice already this year. During a meeting between the Parish Council and the Environment Agency we were advised that this situation will worsen with increased housing.

Page 42 "Gypsy and Traveller Accommodation"

This section details the need for an allocation of 15 pitches by 2011, it also states that they "will examine the potential of current unauthorised sites to meet this need" and that "sites will be allocated in the west of the District" The west of the District is in fact Rawreth, but yet again the Parish name has not been detailed. The Parish already has an unauthorised site which is the subject of an enforcement case and although well kept is on the brow of a hill on a main highway with restricted access which Essex County Council have already raised concerns about, this is not a site that should be considered as part of the requirement due to its location, but also, why is the allocation of all 15 pitches being detailed to one area?

Page 43 to 44 "Appendix 1"

Details of all the infrastructure to accompany residential development is listed, yet there are no detailed costs, have these been done? And are these achievable? Large numbers of housing in one area, as stated in the infrastructure requirements, will necessitate a new primary school. County figures suggest that there will be surplus places in Rayleigh schools even with new housing. Obviously these will be in the wrong parts of the town so increasing the risk that an existing school could close. It makes sense to spread the development in smaller sites around the town, avoiding closure and preventing unnecessary provision of a new school.

Page 57 "Strategies, Activities and Actions - The Green Belt"

The document states that "The Council will continue to support the principals of restricting development in the Green Belt, as set out in PPG2 and will preserve the character and openness of the Green Belt" it further states that "a small proportion of the District's Green Belt will have to have its designation reviewed to allow development" The entire development of 550 houses planned for land north of London Road is all on Green Belt land as is the land at Hullbridge, how does this equate to a "small proportion"?

The Councils own Policy GB1- Green Belt Protection states "The Council will allocate the minimum amount of Green Belt land necessary to meet the District's housing and employment needs" and that they will "direct development away from the Green Belt as far as is practicable and will prioritise the protection of the Green Belt land based on how well the land helps achieve the purposes of the Green Belt".

This area of land confirms all 5 purposes of the national PPG2 - Green Belt:-

It prevents the unrestricted sprawl of western Rayleigh

It provides a barrier to prevent the ultimate merging of Rayleigh, Rawreth and Wickford

It assists in safeguarding the countryside from encroachment

It preserves the setting and special character of historic towns

Assists in urban regeneration, by encouraging the recycling of derelict and other urban land

Rawreth Parish Council have observed that there are a number of sites that were put forward in the "Call for Sites" that are pre-used brownfield land in the Green Belt land, and as such would prove beneficial and in their opinion should have been considered for development. Their non-inclusion as "brownfield" sites makes the current proposals

UNSOUND:

Site No; 73 Hambro Nursery a site of approximately 3.93 hectares, coupled with the adjacent site Clovelly, would provide between 200 and 250 houses in an area of approximately 4.85 hectares this area would have good access directly from the A1245 and if expanded north westward to include land up to and around the Village Hall, approximately another 2.08 hectares could produce between 50 and 80 further houses. This area could be accessed either from the slip road (Chelmsford Road) to the south of the Nevendon Garage or from Church Road.

Both of these sites would remove the need for extra traffic along the A129 and Rawreth Lane which are both already operating well over maximum capacity. This development would require a footbridge for pedestrians, cyclists and horses over the A1245.

Rawreth Parish Council believe these proposals would be sensible infill of these areas and would be on "Brownfield" sites where current businesses are not particularly progressive and would not result in the loss of many jobs. Our figures are quite conservative and we believe that if these sites were chosen a much reduced number of houses would need to be built "North of London Road" on Green Belt land.

Phase 2 - With regard to the houses that are proposed for the Northeast corner of Rawreth/Hullbridge, the Parish Council are concerned that any development would cause considerable extra congestion to the immediate roads. We understand that the thoughts are to "straighten" and improve parts of Watery Lane and Beeches Road to provide access to and through Battlesbridge - a conservation area. Recent experience of deep flooding in Watery Lane with the road closed for several days on 3 occasions in the early part of 2009 proves that this proposal is completely unsustainable. The local drainage systems simply cannot take the amount of run-off experienced now and with further development this

Core Strategy Submission Document

16473 Object

CHAPTER 4 Appendix H1

would increase the problem.

If this development is to go ahead, the Parish Council believe that a relief road should be built, from the end of Watery Lane, skirting to the west of the Rayleigh Park Estate, crossing Rawreth Lane at a mini-roundabout and entering a vastly improved A129 at approximately Lower Barn Farm. This would take any necessary traffic in and out of the area efficiently.

The Parish Council further believe that the Michelins Farm site No: 49 would be an ideal site for the Rawreth Industrial Estate. This would adjoin proposed industrial sites within the Basildon District and would provide excellent road and transport links. Rawreth Parish Council also proposed that the land opposite Michelins Farm could be used to re-site the illegal Gypsy/Traveller site that is currently situated on the busy A1245. The land opposite Michelins Farm would not only be a much safer site for Gypsy/Traveller pitches, but the correct use of the land would also ensure the environmental improvement of the site as a whole.

All of the above proposals were submitted to Rochford District Council, but they were not taken into consideration in the final draft resulting in the predominant use of Green Belt land for development, bounded by already congested roads and, therefore, the proposals are UNSOUND.

Summary: Page 43 to 44 "Appendix 1"

Details of all the infrastructure to accompany residential development is listed, yet there are no detailed costs, have these been done? And are these achievable? Large numbers of housing in one area, as stated in the infrastructure requirements, will necessitate a new primary school. County figures suggest that there will be surplus places in Rayleigh schools even with new housing. Obviously these will be in the wrong parts of the town so increasing the risk that an existing school could close. It makes sense to spread the development in smaller sites around the town, avoiding closure and preventing unnecessary provision of a new school.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16480 - 8324 - Appendix H1 - i, ii

16480 Object

CHAPTER 4 Appendix H1

Respondent: Mr J Needs & Aston Unit Trust [8324]

C/o Sellwood Planning
Stoughton Cross House
Stoughton Cross
Wedmore
Somerset
BS28 4QP

Agent: Sellwood Planning (Mr R M Sellwood) [5054]

Sellwood Planning
Stoughton Cross House
Stoughton Cross
Wedmore
Somerset
BS28 4QP

Full Text:

The separate representations made by the Aston Unit Trust and Mr J Needs on Policies H1, H2 and H3 set out the case why the Core Strategy fails to provide a sound settlement strategy and distributes greenfield housing in a manner which will not deliver a more sustainable pattern of development and will not deliver the Core Strategy objectives. The remedy is to allocate less greenfield development to the villages such as Hullbridge, and more to Rayleigh which is the largest settlement in the District with the greatest range of facilities and services. The representations suggest combining Policies H2 and H3 and allocating further sites at Rayleigh including 200 dwellings to the east of the town. In order to be consistent, it is necessary to add 'East of Rayleigh' to Appendix H1 setting out new infrastructure and services which would be required to accompany the site.

Add to Appendix H1

"East of Rayleigh and South of the B1013

- enhancements to the B1013 (Policy T2)
- local highway capacity and infrastructure improvements
- public transport infrastructure improvements and service enhancements
- improved pedestrian / cycle links to Rayleigh Town Centre
- improved pedestrian / cycle links to the Upper Roach Valley
- sustainable drainage systems
- public open space
- play space."

It is considered that our participation at the oral part of the public examination would assist the Inspector for two main reasons

- Sellwood Planning has a detailed knowledge of the Rochford area, appeared at the last Local Plan Inquiry and was a participant at the RSS public examination. This direct knowledge of the local area and the statutory Development Plan may be of assistance to the Inspector

- Sellwood Planning has experience in promoting major schemes through Core Strategies (eg. 7,000 dwellings in Ashford, 5,750 dwellings in Dover, 2,500 dwellings in Horsham and 1,200 dwellings in Newmarket) and the emerging body of evidence of what constitutes a sound Core Strategy and what is unsound. Our experience indicates that, in a number of respects, the submitted Core Strategy is unsound in its present form.

Summary:

The separate representations made by the Aston Unit Trust and Mr J Needs on Policies H1, H2 and H3 set out the case why the Core Strategy fails to provide a sound settlement strategy and distributes greenfield housing in a manner which will not deliver a more sustainable pattern of development and will not deliver the Core Strategy objectives. The remedy is to allocate less greenfield development to the villages such as Hullbridge, and more to Rayleigh which is the largest settlement in the District with the greatest range of facilities and services. The representations suggest combining Policies H2 and H3 and allocating further sites at Rayleigh including 200 dwellings to the east of the town. In order to be consistent, it is necessary to add 'East of Rayleigh' to Appendix H1 setting out new infrastructure and services which would be required to accompany the site.

Change to Plan

Add to Appendix H1

"East of Rayleigh and South of the B1013

- enhancements to the B1013 (Policy T2)
- local highway capacity and infrastructure improvements
- public transport infrastructure improvements and service enhancements
- improved pedestrian / cycle links to Rayleigh Town Centre
- improved pedestrian / cycle links to the Upper Roach Valley
- sustainable drainage systems
- public open space
- play space."

Appear at exam? Yes

Soundness Tests i, ii

Core Strategy Submission Document

O - 16488 - 9646 - Appendix H1 - i

16488 Object

CHAPTER 4 Appendix H1

Respondent: Mrs Margaret Christian [9646]

41 Westminster Drive
Hockley
Essex
SS5 4XD
01702 204320

Agent: N/A

Full Text: Please find enclosed my objection to the Core Strategy Submission DPD. Please kindly acknowledge receipt of this objection and duly register it.

Objections to RDC's Core Strategy Submission DPD

Reason Unsound

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus service are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

3. RCD are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

16488 Object

CHAPTER 4 Appendix H1

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs not, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. Thus it is unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of address the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:

The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

7. RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

The Foundry Industrial Estates has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy acknowledges this omission was due to a typing error!

The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing HAAP consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy or Hockley Area Action Plan (HAAP) defines its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

9. PPS12, 4.6, states that Cores Strategies show be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which do not indicate how such applications will be handled and does not comply with

Core Strategy Submission Document

16488 Object

CHAPTER 4 Appendix H1

PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

10. The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.

2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion".

4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Core Strategy is inaccurate, misleading and unsound.

Summary:

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. Thus it is unclear if use of Standard Charges is financially viable.

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No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

16530 Object

CHAPTER 4 Appendix H1

Respondent: Ms H Rozga [13921]

56A Aldermans Hill
Hockley
Essex
SS5 4RW

Agent: N/A

Full Text:

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus service are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

3. RCD are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

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Summary:

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4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. Thus it is unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of address the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

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5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:

The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

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Thus the proposals are not founded on a robust and credible evidence base and are unsound.

7. RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates.

The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely.

The Foundry Industrial Estates has never even been previously mentioned in any plan version; A recent amendment to

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the Core Strategy acknowledges this omission was due to a typing error!

The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

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The Foundry Industrial Estate has never even been previously mentioned.

The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate.

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing HAAP consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy or Hockley Area Action Plan (HAAP) defines its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

9. PPS12, 4.6, states that Cores Strategies show be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which do not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

10. The Core Strategy misrepresent the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.

2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion".

4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6.

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Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) "the Council may wish to consider reclassifying Hockley from a town centre to a district centre.

Summary: PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

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O - 16548 - 13667 - Appendix H1 - i

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Respondent: G and S Cooke [13667]

56 Aldermans Hill
Hockley
Essex
SS5 4RW

Agent: N/A

Full Text:

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus service are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

Summary:

Proposals for moving employment to of town locations, at either end of the district, with no existing public transport inks, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

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The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in

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the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

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The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.

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2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion".

4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) "the Council may wish to consider reclassifying Hockley from a town centre to a district centre.

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Change to Plan

Appear at exam? Not Specified

Soundness Tests i

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O - 16581 - 14231 - Appendix H1 - i

16581 Object

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Respondent: Heather Wakefield [14231]

Not provided

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

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The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.
â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

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16581 Object

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Previous consultations ignored by RDC:

• The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

• The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

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RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

• The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

• the Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!

• The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Summary:

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16581 Object

CHAPTER 4 Appendix H1

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â€¢ The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.
 - 2) (10.28) "There is no immediate capacity for additional floor space."
 - 3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion"
 - 4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".
- The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Summary:

Summary:

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Change to Plan

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

Core Strategy Submission Document

O - 16581 - 14231 - Appendix H1 - i

16581 Object

CHAPTER 4 Appendix H1

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16599 - 14232 - Appendix H1 - i

16599 Object

CHAPTER 4 Appendix H1

Respondent: Roger Wakefield [14232]

Not provided

SS5 4UX

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighboring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.
â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

16599 Object

CHAPTER 4 Appendix H1

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PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

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SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

Previous consultations ignored by RDC:

• The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

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Core Strategy Submission Document

16599 Object

CHAPTER 4 Appendix H1

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Core Strategy Submission Document

O - 16599 - 14232 - Appendix H1 - i

16599 Object

CHAPTER 4 Appendix H1

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16659 - 8069 - Appendix H1 - i, iii

16659 Object

CHAPTER 4 Appendix H1

Respondent: A W Squier LTD and the Croll Group [8069]

A W Squier LTD and the Croll Group
Doggetts
Rochford

SS4 3RN

Agent: Andrew Martin Associates Ltd (Mr R Pomery) [7786]

Andrew Martin Associates Ltd
Croxtan's Mill
Little Waltham
Chelmsford
Essex

CM3 3PJ

01245 361611

Full Text:

Appendix H1 - New infrastructure and services to accompany residential development

Summary: The Respondent finds the document to be unsound in its present form, however were the amendments set out in these representations to be incorporated then it is considered that the document will be sound. Whilst it is accepted that it is helpful to identify the new infrastructure and services required to accompany residential development, there is concern that some of the requirements may be excessive given the extent of development proposed.

Full text: With regard to land at East Ashingdon, this site is identified as having a number of new infrastructure and service requirements. Our clients control this land and it is envisaged that the majority of the items identified would form an integral part of any proposals for this area. However we have the following concerns:

1. It is not clear from the evidence base that there is a solid need to expand the school by the 3 hectares referred to in Policy CLT3. Discussions with Essex County Council Education have not been conclusive. The Respondent's master plan illustrates a 3 hectare area of land that could be provided, however the size of this land could vary and should not be fixed until further evidence is provided.

2. Public open space, play space and youth facilities and community facilities are listed as requirements. Whilst it is envisaged that public open space and play space would be provided as part of the development, it is considered that the on site provision of youth facilities and community facilities would be excessive given the scale of the proposals and the other contributions required. Further, Appendix H1 identifies that youth facilities and community facilities are also proposed at South-East Ashingdon, just a short distance from East Ashingdon and therefore it would seem excessive to have youth and community provision on both sites. It should be noted that the site lies in close proximity to a secondary school, which already has sport and recreation facilities i.e. all weather pitch.

Whilst the principle of contributing to the infrastructure and services listed is supported, it is suggested that this should either be in the form of on site contributions or financial contributions towards off site facilities and services in accordance with Policy CLT1.

Proposed Amendment to Appendix H1: For this Appendix to be sound, the heading of the second column should be amended to read "Contributions required for new infrastructure and services to accompany residential development".

Masterplan/Facilities plan Council ref AE22

Summary:

Summary: The Respondent finds the document to be unsound in its present form, however were the amendments set out in these representations to be incorporated then it is considered that the document will be sound. Whilst it is accepted that it is helpful to identify the new infrastructure and services required to accompany residential development, there is concern that some of the requirements may be excessive given the extent of development proposed.

Masterplan/Facilities plan Council ref AE22

Change to Plan

Proposed Amendment to Appendix H1: For this Appendix to be sound, the heading of the second column should be amended to read "Contributions required for new infrastructure and services to accompany residential development".

Appear at exam? Yes

Soundness Tests i, iii

Core Strategy Submission Document

O - 16700 - 9072 - Appendix H1 - i

16700 Object

CHAPTER 4 Appendix H1

Respondent: Essex County Council (Mr Roy Lewis) [9072]

Agent: N/A

Essex County Council
ESH - Spatial Planning
Planning and Transport
County Hall
Chelmsford
CM1 4JU
01245-437578

Full Text: ROCHFORD CORE STRATEGY SUBMISSION DOCUMENT, SEPTEMBER 2009
RESPONSE OF ESSEX COUNTY COUNCIL

1. General Comment

Essex County Council welcomes and broadly supports the Core Strategy prepared by Rochford District Council. The Strategy contains policies and proposals that address the spatial characteristics, issues and opportunities facing the District whilst respecting the distinctive qualities of the different settlements and parts of the District.

The County Council fully supports the maintenance of a strong policy approach to protection of the Green Belt and of the quality of environmental assets in the District whilst making adequate housing and employment provision within the District. The Core Strategy presents an approach that emphasises a balance of opportunity through the District and recognition of emerging economic prospects in the District and neighbouring areas. The intended preparation of more detailed Action Area Plans for London Southend Airport and its environs and for each of the three town centres of Rayleigh, Rochford and Hockley will further enhance the approach of the Core Strategy. The emphasis on the three town centres is particularly welcomed as offering a stimulus to improvement in the services and facilities available locally within the District whilst also affording possibilities of increased community focus.

2. Housing Distribution and Locations

The East of England Plan requires Rochford to provide a minimum of 3,790 additional dwellings between 2006 and 2021. In addition, provision for a further 1,000 dwellings should be made between 2021 and 2025 to ensure delivery of housing for at least 15 years from adoption of the Core Strategy (expected in 2010). Of this total requirement the District Council has identified a capacity of 2,000 dwellings through a Strategic Housing Land Availability Assessment. This means that the Core Strategy has to identify locations for about 1,750 dwellings to be delivered before 2021 and a further 1,000 dwellings between 2021 and 2025.

Policy H1 (The efficient use of land for housing) is supported. However, prioritisation of the reuse of previously developed land within settlements for additional housing is unlikely to provide a sufficient source of provision due to the generally residential nature of existing settlements in the district and the absence of potentially large sites of previously developed land. The assessment of potential for additional housing provision within settlements already includes the proposed re-allocation to substantially residential use of 4 existing employment areas.

Within Policy H2 (Extensions to residential envelopes and phasing) and Policy H3 (Extension to residential envelopes post-2021) the District Council has adopted a balanced approach to the distribution of additional housing locations, which is based on identification of tiers of settlements defined by reference to their accessibility to jobs, services and facilities (some of which lie outside the District) and the need to protect the valued environments within the District. This approach is generally supported, although implementation and delivery of individual schemes should give further thought to securing sustainable functional relationships between proposed development locations and availability of jobs, services and facilities.

The proposed scale and phasing of development at each of the identified locations in Policy H2 and Policy H3 should be capable of being supported by County Council service groups, provided that adequate and timely funding is available. The County Council would wish to work with the District Council to ensure that future infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

3. Economic Development

The approach to Employment Growth (Policy ED1) is supported. Given the economic structure of Rochford District the support to be given to protection and enhancement of the role of small and medium sized businesses; enhancement of the District's commercial centres; and development of a skills training academy is particularly welcome. These measures will assist in building on the existing economic resource of the District.

Proposals for the comprehensive development of London Southend Airport and its environs (Policy ED2) are supported.

16700 Object

CHAPTER 4 Appendix H1

The further elaboration of proposals through an Area Action Plan will provide a firm foundation to realise the economic regeneration and growth opportunities presented by effective use of the Airport. The recognition of the potential environmental impact of the Airport and the commitment to work to mitigate any adverse impacts on the environment and local amenities is fully supported.

The location of the proposed Eco-Enterprise Centre to the North of London Southend Airport (Policy ED4) is supported. Creation of the Centre would assist reduction of the rate of business start-up failure in the district. Further the proposed location for the Centre would afford a clear offer to businesses within an area of varied business activity.

The continued protection and enhancement of existing employment land (Policy ED3) is supported, as is the identification of 4 existing employment sites for appropriate alternative, substantially residential, uses. Each of the 4 sites affords particular issues and opportunities whereby their redevelopment for other uses and relocation of existing occupiers would confer advantage for the immediately neighbouring areas and for the District as a whole.

4. Town Centres

The town centres of Rayleigh, Rochford and Hockley, and future plans for them, are closely linked to the economic development of the District but also present the opportunity to offer greater community focus within the District. The varied approach being taken to each of these town centres is supported (Policy RTC4, RTC5 and RTC6), notably the recognition of the role and purpose of the town centres beyond retail uses.

The contribution that the County Library service could make to plans for the town centres should not be overlooked. The 5 libraries in the District are substantial footfall draws in their localities and act as a 'community anchor store'. This has knock-on effects in encouraging use of neighbouring retail and service facilities. Further the Library service is currently looking at co-location opportunities for other services within the libraries which would enable them to act as a community focus.

5. Transport

The transport aspects of the Core Strategy are well balanced in identifying potential measures that would meet the needs of existing residents and businesses in the District as well as needs arising from future development. The approach reflects and makes good reference to the transportation aspirations of the County Council. The policy emphasis on close working between the District Council and the County Council to advance the transport aspirations is welcomed and fully supported.

In relation to parking standards (Policy T8 and Paragraph 10.30) the review undertaken by Essex County Council in conjunction with the Essex Planning Officers Association has now been completed. Revised parking standards have been agreed and signed off as County Supplementary Guidance, in accordance with PPS12, and is being applied by the County Council as Local Highways Authority.

6. Coastal Protection Belt

Policy ENV2 (Coastal Protection Belt) is not supported because in its current form it is not a suitable or effective replacement policy for Policy CC1 of the Replacement Structure Plan. Structure Plan Policy CC1 (The Undeveloped Coast - Coastal Protection Belt) currently remains a 'saved' policy of the Essex and Southend-on-Sea Replacement Structure Plan, April 2001 (following a direction of the Secretary of State, dated 27th September 2007, under paragraph 1(3) of Schedule 8 to the Planning and Compulsory Purchase Act 2004). The existing Policy CC1 reads, 'Within the Coastal Protection Belt defined in adopted local plans there shall be the most stringent restrictions on development within the rural and undeveloped coastline situated outside existing built-up areas, and any development which is exceptionally permitted within this Belt shall not adversely affect the open and rural character, historic features or wildlife.'

Core Strategy Policy ENV2 should be revised to include specific reference to,

- * Definition of the boundary of the Coastal Protection Belt in another Development Plan Document;
- * the application of the most stringent restrictions on development within the rural and undeveloped coastline;
- * any development exceptionally permitted not adversely affecting the open and rural character, historic features or wildlife.

7. Historic Environment

The importance of the historic environment in Rochford District is clearly identified within the Core Strategy document. Nevertheless, the policy guidance could be usefully enhanced to promote consideration and enhancement of the historic environment and use of the historic environment to shape place. This would be achieved by the following amendments to the Core Strategy,

- * Policy ENV1 (Protection and Enhancement of the Natural Landscape and Habitats and the Protection of Historical and Archaeological Sites) should be amended by deletion of the final sentence and its replacement with, The Council is committed to the protection, promotion and enhancement of the diverse historic landscape and extensive surviving archaeological deposits of the District.

16700 Object

CHAPTER 4 Appendix H1

* Paragraph 8.15 of the supporting text should be amended to better support the suggested amendment to Policy ENV1. The existing text of Paragraph 8.15 should be deleted in its entirety and replaced by,
The historic environment of Rochford District has developed through a history of human activity that spans over 450,000 years. Much of the resource lies hidden beneath the ground in the form of archaeological deposits. Other elements such as the historic landscape, the pattern of field, farms, woods and grazing marsh which characterise the District, are a highly visible record of millennia of agriculture, industry and commerce. Of particular significance are the coastal, island and estuarine areas where multi-period landscapes reflecting the exploitation of coastal and marshland resource survive. The District also includes the important historic medieval market towns of Rochford and Rayleigh.

* Page 16 (Sustainable Community Strategy Priority: Promoting a Greener District) should be amended to further support the approach to the Historic Environment. The fourth bullet of the Key Section/Policies of the Core Strategy should be amended to include the word 'historic', so that the first sentence of the bullet would read,
The Environment chapter seeks to protect and enhance the biodiversity, historic and natural environment of the District by protecting sites of local, national and international importance.

8. Community Infrastructure

The approach to Community Infrastructure is supported. The County Council would wish to work with the District Council to ensure that future community infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

In addition, it should be noted that,

* Some County Council services are not highly visible despite being regarded as highly desirable community services by local residents. The need to ensure adequate funding and contributions to enable these services to meet community expectations should be recognised and acknowledged in consideration of planning obligations and standard charges.

* The Adult Community Learning Centre at Rocheway, Rochford could be better located with regard to the wider Rochford/Castle Point area of service. Relocation of the Centre could provide opportunities both at the new location and for the current site.

* The Core Strategy should make specific reference to,

o Appendix H1, Location at South Canewdon: new Early Years and Childcare facilities;

o Policy CLT2, final sentence: insert after the words 'primary schools' the words 'and Early Years and Childcare facilities';

o Appendix CLT1, Other issues/comment: for Early years and childcare facilities add 'Land to be allocated within new residential areas, as appropriate'.

9. Implementation, Delivery and Monitoring

The inclusion in the Core Strategy of a section considering Implementation, Delivery and Monitoring is welcomed and supported. Nevertheless, the District Council, in moving towards implementation and delivery of the individual elements of the Core Strategy, should highlight those schemes and projects that are critical to achievement of other aspects of the Strategy.

Further, the monitoring proposal for Policy H6 (Lifetime Homes) and for Policy CP1 (Design) should be amended,

* Policy H6 (Lifetime Homes) - the identified monitoring tool is Core Indicator H6 Housing Quality Building for Life Assessments. The Building for Life Assessment methodology was devised to measure the overall design/layout quality of housing developments. It was not devised to measure compliance with Lifetime Homes, which is largely, but not exclusively, concerned with internal space standards and the provision of internal arrangements within dwellings to meet needs of all residents.

* Policy CP1 (Design) - the monitoring indicator proposed by the Core Strategy is not supported because it is unclear what the indicator would actually be measuring. The proposed indicator should be replaced by the Core Indicator, Housing Quality - Building for Life Assessments, as suggested by the County Council in its response to the Core Strategy Preferred Options, October 2008. A better approach would be to base evaluation and monitoring of Policy CP1 on the Commission for Architecture and the Built Environment's (CABE) 20 Building for Life principles, particularly as Government has endorsed these principles and is urging local authorities to use them to assess design quality. It is suggested that the monitoring arrangements for Preferred Option CP1 be deleted and replaced by the following text, 'The success of the implementation of this policy will be monitored by assessing schemes, or an appropriate sample of schemes, against the Commission for Architecture and the Built Environment's (CABE) Building for Life principles.'

10. Access to Housing

The Core Strategy notes the higher prevalence of older people in Rochford District and the need to support them. However, a more broadly based approach to access to housing should be adopted by Policies H4, H5 and H6. It should recognise the presence of other vulnerable adults in the community, for example, those with learning or mental health disability, and the range of possible forms of accommodation, including supported, sheltered and extra care accommodation. The high level of owner occupation in the District further emphasises the need for a broader approach. The emphasis on Lifetime Homes would not address the variety of future needs, whilst the potential exemptions to the

Core Strategy Submission Document

O - 16700 - 9072 - Appendix H1 - i

16700 Object

CHAPTER 4 Appendix H1

Summary: Lifetime Homes policy standard in Policy H6 are likely to act against demographic trends. The approach to Community Infrastructure is supported. The County Council would wish to work with the District Council to ensure that future community infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

In addition, it should be noted that,

* Some County Council services are not highly visible despite being regarded as highly desirable community services by local residents. The need to ensure adequate funding and contributions to enable these services to meet community expectations should be recognised and acknowledged in consideration of planning obligations and standard charges.

* The Adult Community Learning Centre at Rocheway, Rochford could be better located with regard to the wider Rochford/Castle Point area of service. Relocation of the Centre could provide opportunities both at the new location and for the current site.

The Core Strategy should make specific reference to, Appendix H1, Location at South Canewdon: new Early Years and Childcare facilities;

Change to Plan The Core Strategy should make specific reference to, Appendix H1, Location at South Canewdon: new Early Years and Childcare facilities;

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16823 - 9676 - Appendix H1 - i, ii, iii

16823 Object

CHAPTER 4 Appendix H1

Respondent: Bellway Homes [9676]

Bellway Homes
Bellway House
Bury Street
Ruislip
Middlesex
HA4 7SD
UK

Agent: Barton Willmore LLP (Mr E Hanson) [14266]

Barton Willmore LLP
7 Soho Square
London

W1D 3QB

020 7446 6888

Full Text:

See statement

Council ref AE18 and AE18a

Summary:

See statement

Council ref AE18 and AE18a

Change to Plan

See statement

Council ref AE18 and AE18a

Appear at exam? Yes

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 16911 - 14278 - Appendix H1 - iii

16911 Object

CHAPTER 4 Appendix H1

Respondent: L J Construction (Mr L Jose) [14278]

L J Construction
Unknown, represented by agent -

Mr M Carpenter
Director
Planware Ltd
The Granary
37 Walnut Tree Lane
Sudbury
Suffolk
CO10 1BD

Agent: Planware Ltd (Mr M Carpenter) [14280]

Planware Ltd
The Granary
37 Walnut Tree Lane
Sudbury
Suffolk

CO10 1BD

01787465800

Full Text: Policy Appendix H1 of the Core Strategy is not "sound". The appendix H1 is unjustified and this not sound.

Para 4.9 of PPS12 requires infrastructure needs and costs to be identified. This has not been completed or published. There is no evidence to support the infrastructure requirements, or who will provide it, or when.

The list of infrastructure projects is not justified in accordance with the PPS. The list of infrastructure required, whilst potentially accepted appears to be based on a development brief that we are not aware of and has not been published. The site allocation should be general at this stage in order to allow proper consultation of the alternatives. This has not previously be consulted on in the previous options documents.

Proposed Change

We request that the wording be changed from "North of London Road, Rayleigh" to refer to "West of Rayleigh", to allow further consideration of alternative sites.

We reserve the right to expand on these grounds in more detailed evidence to follow should the Inspector request.

Site location plan received, see Council ref AE30

Summary: Policy Appendix H1 of the Core Strategy is not "sound". The appendix H1 is unjustified and this not sound.

Para 4.9 of PPS12 requires infrastructure needs and costs to be identified. This has not been completed or published. There is no evidence to support the infrastructure requirements, or who will provide it, or when.

The list of infrastructure projects is not justified in accordance with the PPS. The list of infrastructure required, whilst potentially accepted appears to be based on a development brief that we are not aware of and has not been published. The site allocation should be general at this stage in order to allow proper consultation of the alternatives. This has not previously be consulted on in the previous options documents.

Site location plan received, see Council ref AE30

Change to Plan Proposed Change

We request that the wording be changed from "North of London Road, Rayleigh" to refer to "West of Rayleigh", to allow further consideration of alternative sites.

We reserve the right to expand on these grounds in more detailed evidence to follow should the Inspector request.

Appear at exam? No

Soundness Tests iii

Core Strategy Submission Document

S - 16927 - 10009 - Appendix H1 - None

16927 Support

CHAPTER 4 Appendix H1

Respondent: Barratt Eastern Counties [10009]

Barratt Eastern Counties
Barratt House
7 Springfield Lyons Approach
Springfield
Chelmsford
Essex
CM2 5EY

01245 232200

Agent: Kember Loudon Williams Ltd (Mr Martin Hull) [8466]

Kember Loudon Williams Ltd
Ridgers Barn
Bunny Lane
Eridge
Tunbridge Wells

TN3 9HA
Engalnd
01892 750018

Full Text: Local Development Framework

Representations on the Core Strategy
Submission Document, November 2009
On behalf of Barratts Eastern Counties

Introduction

The requirements of Core Strategies are enshrined in the 2004 Planning and Compensation Act, the Town & Country Planning (Local Development) England (Regulations) 2004 and the 2008 policy guidance in PPS12. The requirements of Coe Strategies are clear. And they are legal requirements. The Core Strategy must comply with the Local Development Scheme, Statement of Community Involvement and the Regulations. The Core Strategy must be subject to a sustainability appraisal, have regard to national guidance, conform generally with the Regional Spatial Strategy and have regard to any Sustainable Community Strategy. A Core strategy must be sound - justified, effective and consistent with national policy. The following representations therefore focus on these legal requirements.

HOUSING

Paragraph 4.6 - Evidence Base

To meet the soundness test Submission Core Strategies (SCS) must be justified, that is to say it must be founded on robust and credible evidence base and comprise the most appropriate strategy when considered against reasonable alternatives. The housing strategy in as far as it identifies a need for Green belt sites is sound, however, there are other elements which are unsound.

Paragraph 4.6 notes that the Strategic Housing Land Availability Assessment (SHLAA) has examined the supply of housing. It is presumed that the Table at paragraph 4.6 is the outcome of this examination. Whilst the SHLAA has some legitimacy in that it identifies various sites that are apparently available, we are concerned that because the SHLAA was only published in November 2009 it post dates the SCS. This implies that the SCS is driving the SHLAA exercise rather than the other way round. Whilst this may have no real practical effect on the outcome of the SCS and the identified need for Green Belt sites, the Inspector will be mindful of the advice in paragraphs 33 and 54 of PPS3 that SCS draw on the evidence in SHLAA. It may be that the SCS should explain how the evidence base has been used to justify the strategy.

PPS12 explains at paragraph 4.37 that Core Strategies are based on thorough evidence. Since the SHLAA has only recently been published it is considered that the SCS is unsound as it is not justifiable. This, together with other comments on the SCS, indicates that the process should be delayed to ensure that a more robust document is placed in front of the EiP Inspector.

Table at Paragraph 4.6 - Evidence base

From our review of the available evidence it would appear that the housing land supply is insufficient and that Green Belt release are required. From the wider strategy being promoted we note that some of the sites that the District Council consider to be 'appropriate' are likely to relate to existing employment areas. As set out elsewhere in our representations, we maintain severe reservations that the redevelopment of existing employment sites for alternative uses and particularly the Eldon Way Industrial Estate is unsustainable. We will make reference to the effectiveness of this strategy in relation to sustainability, whether it is justified in the context of National Policy and the deliverability of such a strategy elsewhere.

In particular, paragraph 11.32 of the SCS refers to existing employment land and sites within the UCS. It does not refer the SHLAA and as such it appears that an evidence base to support the re-use of employment land for residential is not reported in the SCS.

Having reviewed the 2008 Annual Monitoring Report, as we did when commenting on the 2008 Preferred Options Core Strategy, we maintain severe doubts as to the appropriateness of some of the previously developed sites identified as potential housing sites and their expected housing yield. Whilst we cannot at this stage ascertain whether the SHLAA

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CHAPTER 4 Appendix H1

sites referred to in this table correlate with the Annual Monitoring Report and indeed the 2007 Urban Capacity Study, it is our view that there will be some commonality and so the reliance on these sites is likely to be at odds with Government Policy. We shall elaborate on this objection in relation to the specific housing policy below.

We note that the last two rows in the Table at paragraph 4.6 set out figures with and without Green Belt releases. The text to this section of the Core Strategy should, for reasons of clarity, explain that Green belt review will be necessary in order to deliver the required housing.

Paragraph 4.9

The table on page 40, which sets out the settlement tiers, is supported. Rayleigh, Rochford/Ashingdon, Hockley/Hawkwell are clearly the largest settlements in the District and they benefit from good employment, housing, leisure, community and public transport provision. These settlements are the most sustainable ones with the greatest mix of uses. Consequently, it is sensible that the Core Strategy identifies these as top tier settlements and is able to target them with growth accordingly. This component of the strategy is justified by reference to sustainability data and is effective, since targeting development at these locations will ensure a more sustainable pattern of development.

Paragraph 4.14

We maintain that the strategy for redeveloping the Eldon Way Industrial Estate for housing and other alternative uses to employment is unsound. It is neither justified nor effective. The Industrial Land Availability Study 2006 sets out on page 7 strategic objectives. The 3rd objective seeks to Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive. Clearly the strategy as currently drafted envisages major changes to existing industrial estates, including alternative uses. This strategy is not consistent with other strategies and evidence based studies and so cannot be justified in the context of the tests set out in PPS12. It is also an ineffective strategy since the new employment locations that would free up the Eldon Way site for redevelopment relies on transport infrastructure that has no certainty of being delivered. Principally, the erosion of employment uses at Eldon Way could make the settlement of Hockley/Hawkwell less sustainable and thus conflict with the tiered approach on page 40, paragraph 4.9.

Policy H1

Prioritising the use of previously developed land ("pdl") is supported in principle. It is a justified strategy in the context of PPS3 and effective as sequential choices can be made by implementing the policy. However, the District Council is also promoting a strategy which seeks the redevelopment of existing employment locations to alternative uses and by consequence is identifying green field sites for new employment development elsewhere (Policy ED4 refers). This 'land swapping' is not considered consistent with PPS3, nor is it considered to be justified or effective in delivering the desired strategy. This is particularly the case as most of the existing employment sites are occupied and therefore unavailable for redevelopment. In addition, the new Greenfield sites are in an arguably less sustainable locations away from the top tier settlements identified on page 40 of the Submission Core Strategy. Clearly this element of the strategy is inconsistent with the wider strategy.

The Industrial Land Availability Study 2006 is included as an evidence base by the District Council. It includes an introductory section, which explains that the authority wishes to make Rochford the place of choice for new business. It includes several strategic objectives on page 7 including "Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive." It reviews existing employment areas and identifies vacant land, including land available from allocations. It does not include any assessment of new sites or potential opportunities for new sites that might have been expected to feed into the Core Strategy. The strategy for identifying Green Belt site employment allocation does not appear to be based on any evidence in this document and in that context cannot be justified. The strategy being promoted potentially conflicts with Government policy in PPG13, PPG2 and emerging PPS4.

The Employment Land Study 2008 is a much later document. It has a key recommendation on page ii "we recommend that Rochford District Council adopts strong policies to protect existing employment land." Furthermore under recommendations for existing sites on page iii-iv of that document it states "In our view, Hockley Trading Centre is a strategically well placed employment location. However, we recognise the ambitions of the Hockley Town Centre masterplan and that within this the Council should consider it to be allocated for other uses. However, we recommend that this reallocation happen only if provision is made within the masterplan for office use within Hockley Town Centre as part of a mixed use scheme." The view of the writers of this document is clear - the Eldon Way Industrial estate (Hockley Trading Centre) is a good employment site and that it is for other reasons that alternative uses are being considered and only then if office development is supported. This supports our representations that new future uses at the Eldon Way site should be employment dominated and that alternative uses should relate to the objectives of the Town Centre which is to enhance the shopping and leisure facilities. Residential is not an appropriate alternative.

This document recommends the use of land to the west of Rayleigh for employment and envisages Green belt release. However, the SCS does not explain through the evidence base why existing employment sites should be 'deallocated' and Green belt land unnecessarily used.

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In addition to these key issues we have some specific concerns. As a consequence we maintain an objection to the second paragraph of Policy H1. This policy states that the Council will seek the redevelopment of various industrial estates including Eldon Way. The Policy says that alternative uses will be sought (presumably alternative to the existing employment offer) and that new land will be allocated elsewhere. This policy statement, in relation to Eldon Way in particular, is unsound for a number of reasons:

The emerging Hockley Area Action Plan consulted upon in 2008 states that the Eldon Way Industrial Estate is strategically well placed. In a sense this statement underplays the true importance of this highly sustainable employment location and only major employment area in Hockley/Hawkwell. The employment area is adjacent to the railway station and located a short distance from the main bus routes that run along Spa Road. Some of the residential areas of the town are also within walking distance of this commercial area, thus providing a potential for sustainable travel by employees. The Eldon Way Industrial Estate is therefore right at the heart of the settlement of Hockley/Hawkwell and provides an opportunity to meet sustainable transport objectives by reducing the need to travel by car. Consequently, this employment area should be highlighted as a premier employment site in sustainability terms, both in the context of PPG13, PPG4 and PPS6. To encourage alternative uses as set out in Policy H1 implies the removal of the majority of employment based activity at Hockley/Hawkwell and this would be contrary to National policy, would not be the most appropriate strategy when considered against alternatives and is therefore unsound.

Whilst it is acknowledged that improvement to the Eldon Way Industrial Estate can and should take place, the extent to which the mix of employment uses should be altered in favour of alternative land uses requires careful consideration. It is our view that a mix of existing or indeed new employment land uses with some Town Centre type uses should dominate the Eldon Way site. A mix of employment types between offices, light industry and other high technology industries should be encouraged as this will provide many locational advantages to the firms that agglomerate together. The Council says that the existing uses on this site are harmful to amenity. However, the site has operated for many years without any significant issues and if renewal for B1 type uses are encouraged then the employment area can be maintained without harm to amenity. Renewal of the employment stock can help develop and improve trade, improve the sustainability of businesses as a whole and make for a more flexible labour market as skill levels are varied. A singularly different use altogether or a variety of uses which excludes employment could undermine the long term sustainability of the area and Town Centre. As such Policy H1 is not an effective strategy and should be amended to acknowledge the importance of Eldon Way and the need to renew the employment stock to ensure that the site maintains its important role as a employment site, albeit with some ancillary alternative use development where appropriate.

The 2008 Retail Study notes that Hockley Town Centre is not strong and there is trade leakage. Eldon Way Industrial Estate provides a customer base for existing town centre uses. Weekday spending within town centres is an important contributor to the viability of many retail and leisure businesses either through expenditure by employees during the lunchtime trade or expenditure by employers, on necessary goods and services. This relationship helps sustain the critical mass of a centre and provides a platform for new retail and leisure growth. It is important to have a balanced centre with a variety of uses. Policy H1, as currently drafted, implies the removal of employment related development and this is likely to harm the vitality and viability of Hockley Town Centre. The Council has presented no evidence to suggest that this is not the case. Importantly, the 2008 Retail Study explains that there is a need for additional retail and office space. In principle we would support additional office and other B1 type uses plus retail but employment uses should always dominate for the sustainability reasons given above. Retail and office development are likely to present a viable alternative to some of the more industrial type uses.

Consequently, we do not support the phrasing of the third paragraph of Policy H1 and maintain that the most appropriate strategy is to seek renewal of the employment stock with employment based uses and with some new retail development. Removal of employment land uses completely as currently implied-which was the approach adopted in the emerging Hockley Area Action Plan - is not a justifiable strategy.

One of the key tests of a Core Strategy is consistency between policies in the emerging Plan and this strikes at the heart of demonstrating an effective strategy. Policy H1 implies alternative uses to employment and the relocation of Eldon Way to a site identified under Policy ED4. However, Policy RTC6 sets out a suite of policy criteria for Hockley Town Centre which includes employment and commercial activities. In addition Policy ED3 seeks the protection of sustainable employment sites (Eldon Way) and notes that some reallocation of existing employment sites will include a proportion of employment. It notes that in the case of Eldon Way employment development will form a component. The policies appear at odds with one another. The third paragraph of Policy H1 should be deleted as the second paragraph is sufficient to set a strategic context for delivering new housing development. The employment policies and Hockley specific policies should be left to consider the type and quantum of land uses appropriate in the area. If the third paragraph of H1 is to be retained then it should tie in more with Policy RTC6 and in our view explain that employment uses should dominate any redevelopment proposals for the Eldon Way site and that retail and leisure uses should be a supporting proportion.

Implementation, Monitoring and Delivery - page 132 onwards

One of the key tests of soundness is that the Core Strategy should be effective - it should be able to deliver its strategy. The Implementation strategy set out at page 132 onwards of the Core Strategy does not explain how Policy H1, RTC6 and the strategy for redeveloping Eldon Way (Policy ED2 and ED3) will be delivered. The comment at Policy ED3 on

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page 161 identifies it as a potential risk and alludes to land assembly difficulties and the choices to be made by owner/occupiers. In order to deliver the strategy there should be a clear understanding as to whether the new land use values being promoted are sufficient to encourage relocation voluntarily. Secondly there is a need for more information to be gathered and presented to show that current occupiers and landowners are willing to relocate and the timescales likely for this. For example, do the building lease contracts enable early review or are there any break out clauses. There should be some commentary on whether the Council will engage in compulsory purchase orders to pursue their strategy should the 'encouragement' route fail. As currently drafted there is no clear path to deliver the strategy and the danger is that despite reallocation, the sites identified for redevelopment will not come forward in the plan period. In this regard, evidence to satisfy the test of soundness is not provided.

Policy H2 - General Locations

We support the strategy that new housing growth should be targeted at land South of Hawkwell. This area is suitably located to the urban area of Hockley/Hawkwell and to tie in with the settlement tiers on page 40 of the Submission Core Strategy the same terminology for settlement should be used. This ensures a consistency within the SCS. The choice of this location as a housing growth area is appropriate as it would not contribute to the coalescence of the urban area with Ashingdon (there is existing development between this identified housing area at Rectory Road and Ashingdon and moreover, Rectory Road can form a natural physical boundary for the new Green belt boundary. This area is also well located to the existing road network. Cherry Orchard Way has recently been improved and provides much better accessibility to the proposed housing growth area than any other location around Hockley/Hawkwell. The existing bus routes along Rectory Road also make this location sustainable and the additional housing proposed will help underpin the financial viability of bus routes in this area. Locally there are employment opportunities, including the small commercial estate off Main Road. The Eldon Way Industrial Estate adjacent to the Town Centre also provides the opportunity for employment locally. Extensive public open space, play pitches and built leisure facilities are located just to the north of this area and a community hall is located off Briar Close, nearby. The area to the south of Hockley/Hawkwell is close to local shops on the corner of Heycroft Road and Main Road and there are numerous footpath links between this area and the local community including links via Thorpe Road, Thorpe Close, Briar Close, Hawkwell Park and Park Gardens. The area therefore provides the opportunity to enhance existing links, including cycle links, and contribute towards community integration - more so than other sites on the south side of this settlement. The site is also in the control of one house builder and deliverable.

However, we find that the Policy is not fully consistent with national policy and furthermore needs to be reviewed in order to be justified and effective. We have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with this policy and feel that Green Belt review should be more explicit throughout the SCS. We note that it is only Policy H3 which indicates the need for Green Belt land review. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H2 and certainly Policy H3 and Policy GB1 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary.

Policy H2 - Phasing and Quantum

The 2008 Preferred Core Strategy document indicated that the area south of Hawkwell should deliver 330 dwellings over a phasing period to post 2021 (see Policy H2 and H3 of that document). The SCS reduces the quantum of housing in this area to 175 but expects delivery by 2015. At a broader level the Preferred Options Core Strategy of 2008, (Policy H2) required 1,450 dwellings to 2015 and a further 1,050 by 2021. In the SCS the figures are now 775 and 1,010 respectively.

Since the SHLAA post dates the publication of the SCS, we are uncertain as to the reason why such a significant reduction in quantum of housing and extensions to the residential envelope is considered necessary. Presumably it is the 'new' strategy to redevelop existing employment areas within the settlements that has led to this change. Our representations on this strategy and specifically the Eldon Way Industrial Estate are included elsewhere within our representations. Previously we have commented on the Table at paragraph 4.6 of the Submission Core Strategy and the lack of evidence to underpin that table. It seems odd that in the space of a year the expected requirement for Greenfield sites has effectively halved on the basis of a SHLAA exercise. The community is therefore not able to effectively

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comment on the housing land supply and at this stage the Submission Core Strategy is legally unsound.

That said, we are of the view that the quantum of housing envisaged south of Hockley/Hawkwell should be more than the 175 currently envisage. In coming to this view we have reviewed the Urban Capacity Study and the latest housing figures in the Annual Monitoring Report 2008. We conclude that the shortfall in housing land supply is such that 330 dwellings in this location is appropriate.

The recently published SHLAA is based upon the data obtained from the Urban Capacity Study 2007, a call for sites exercise and data from the Annual Monitoring Report 2008.

The 2007 Urban Capacity Study (UCS)

1. 2007 is widely recognised as being the peak level of house prices in the UK and it was acknowledged by Government and practitioners alike that 2007 house prices were at an unsustainable level. It is our view that utilising the 2007 UCS as an evidence base without reference to the market does not pick up the depressed demand that is likely to now exist. Recent corrections to the housing market now mean that housing land prices are at a much lower and arguably more affordable level than before. The implications are that some pdl may not be viable for housing development. Often brownfield sites have much higher development costs than Greenfield sites and so the yield from urban capacity will be much lower than anticipated in the 2007 study. One example is the employment allocation of the Adopted Local Plan located at 76-92 Main Road, Hawkwell. This site has been allocated for several years and has been available during the most recent rises in residential property prices during 2006-07. As a consequence the lack of progress on the site can only be described by its current occupancy and perhaps it comprises high value uses that do not encourage redevelopment. Despite this the site is identified as having high potential for alternative use and high potential demand. The SHLAA form notes that there is no information on legal constraints (e.g., tenancy agreements) As a consequence it is difficult to see how this could continue to be a potential site and as a consequence the allowance for green field releases should be increased.

2. There are considered to be other instances in the UCS and the recently published SHLAA where the assumptions and calculations would indicate that the 1301 urban capacity figure is over optimistic and the SHLAA assessment is limited. In the assessment of 'non-residential sites in appropriate locations' within the UCS assumptions are made as to the probability of sites coming forward for new housing. 68-72 West Street, Rochford is identified as a high probability site but we note that it has been subject to 7 refusals of planning permission/conservation consent. There is a significant gap between the urban capacity identified as being suitable by the Council and the capacity applied for by the owners. Given its alternate use value, it is debateable whether the two capacity figures can be reconciled. No 247 London Road is another example of a site allocated in the Local Plan but which hasn't come forward. This is now the subject of a proposal for a care home and if approved would further limit the scope for market/affordable housing capacity on the site. A striking example of how the urban capacity study has underestimated is also evidence by 2-4 Alderman's Hill, Hockley - described as a disused service station. There has been no residential development application on this site since 2004 and most recent applications have sought commercial use of the site. Rather than being evidence of housing land deliverability, this particular site evidences the need for commercial uses in the area. There are therefore deliverability doubts over these 'high probability' categories which amount to some 40 units.

3. In relation to the assessment in the UCS entitled 'intensification of existing residential uses' we note that the assessment is premised on an assessment of recent trends taking into account net completions between 2001-2006 and 2005-06. This is effectively an assessment of windfall trends and not an approach that PPS3 encourages. Importantly Table 3-12 in the urban capacity study seeks to project forward urban capacity from residential redevelopment - a period that benefited from high house prices and PPG3 guidance encouraging redevelopment. These two circumstances have markedly changed and so the assumptions and conclusions drawn would also have changed. Even taking into account the UCS discounting, the reliability of the 404 units from this source must be questioned and in our view the 1301 figure cannot be a sound basis for urban capacity and further Greenfield releases are necessary.

4. In the section of the UCS entitled 'subdivision of dwellings' and 'living above the shop' it is estimated that recent trends would result in 7 and 15 units. Our concerns with using trends as a basis for urban capacity are detailed above - PPS3 does not encourage this. Rather, local authorities are charged with surveying their areas, identifying which areas may yield urban capacity and how much and developing policies to achieve that. Government guidance does not encourage the estimation of windfalls in the way the UCS does.

5. Redevelopment of established employment land is a separate section within the UCS. At 1 above we identify the low probability of the Main Road residential allocation coming forward. This remaining section of the UCS considers 11 further employment sites which were first identified in the 2000 UCS. Three of these are considered to have a high probability of coming forward. We have looked at these three sites and can find no evidence that they are likely to come forward. In the 8 years between 2000 and 2008 the three identified high probability employment sites have not been developed and there is no reason to assume that the next 5-10 years will be any different. For example the Rawreth Industrial Estate is identified as being well used in the UCS and although it has some unneighbourly uses there is no indication that the site is available, suitable or deliverable for residential. Land between 39-69 Lower Lambricks, Rayleigh is identified as having a high probability of residential uses. Yet there is no

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evidence of any pre-application advice or planning applications for this area. Stambridge Mills, Mill Lane, Stambridge is a further example. This site is separated from the urban area, in a flood risk zone and protected in the 2006 Replacement Local Plan by Policy EB9 which promotes B1 uses. Against this background there is only two relevant planning applications affecting this area both date from the early 1990's and relate to a plant room and loading bay. There is no evidence that this is likely to come forward for residential purposes in the next 5-10 years.

6. In the UCS extant permissions are identified as 856 dwellings. It is important to note that this figure needs to be continually reassessed so that from the point of adoption of the Core Strategy a 5 and 10 year housing land supply is available. The SHLAA notes extant permissions for 2009-14 being 106. As noted below extant permissions do not necessarily translate into deliverable sites. There is therefore a contingency that needs to be built in. Further allocations on greenfield land need to be increased and as such the quantum of housing in the area south of Hockley/Hawkwell should be increased to 330 dwellings in order to begin to meet the shortfall identified.

The District Council's 5 year housing supply assessment

7. The District Council's Annual Monitoring Report ("AMR") 2008 purports to demonstrate a 5 year housing land supply. The preamble to Table 4.10 in the AMR 2008 explains that Rochford District Council ("RDC") has included units under construction, units with full permission, units with outline permission, units with a resolution to grant, units subject to preapplication discussion/Urban Capacity Assessment and land allocations in its trajectory. The reader is referred to Appendix B which breaks down the sites in more detail. The recently published SHLAA also includes a table showing a potential 1273 dwellings deliverable. However, it refers to "appropriate brownfield sites." Since these 'appropriate sites' are do not benefit from an application or a planning permission it is difficult to programme them into the housing delivery trajectory.

8. In the full planning permission category of the AMR 2008 where work has not yet started there can be no guarantee that all these sites will be delivered in the 5 years. This comment relates to the one above in relation to the recently published SHLAA. It is not uncommon for permissions to be obtained to provide a means for valuing a site where the owner has no immediate plans to sell the site or develop housing. Delivery may also be hampered by funding constraints, or site assembly problems (where sites are in an alternative use or relocation constraints). Appendix B of the AMR 2008 does not set out the intentions of the landowner or whether the sites are truly achievable in the 5 year period as per PPS3 requirements. The SHLAA purports to show developer intentions at Appendix C but the assessment by the local authority into the legitimacy of some of the claims is not presented. The evidence base is not as full as it should be to demonstrate the robustness of Table 4.6 of the SCS. It is also unclear the extent to which this table is based on either the UCS 2007, AMR 2008, SHLAA 2009 or a combination of all three. This should be set out clearly.

9. In addition, to the 'non delivery' of a proportion of new homes in the AMR 2008, there is concern at the timings of delivery in that data set, for example, 10 units in 2008-2009 relates to outline planning permissions and it is doubtful whether reserved matters can be turned round quick enough to begin delivering housing in this year period. There could well be examples in that set of data where the delivery of units in the first year of the 5 is unlikely, thus delivery is reduced for that period and pushed back and this process is then compounded throughout the data set up to and beyond year 5. Statistical evidence from the Department of Communities and Local Government ("CLG") reveals that building starts are 43% down on the quarter to March 2009 compared with March 2008. It is not clear whether the recently published SHLAA has taken this into account and unless it does the data in the Table at 4.6 of the SCS cannot be relied upon, particularly given the current recessionary circumstances. In relation to the Table at Paragraph 4.6 a refinement is therefore needed to take into account this effect on phasing.

10. This problem is compounded for other units relied upon where permission has been granted but no start on site has been made; this accounts for a considerable number of sites in 2009-10 period (100 dwellings) which is (year 2 of the 5 year period). A delay in these will require more Greenfield sites to be identified in order to meet the shortfall.

11. Finally we note that the East of England Plan expresses its land supply requirement as a minimum. This strategy is not reflected in the

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Submission version of the Core Strategy policy H2.

12. In summary since neither the UCS nor the Annual Monitoring Report form a SHLAA, reservations are maintained about the degree to which sufficient housing land has been identified.

Policy H3

In the Preferred Options Core Strategy 2008 more locations were identified for housing growth in the post 2021 phase. Whilst it is our view that land south of Hockley/Hawkwell should benefit from a greater number of dwellings than the 175 currently identified (330) in order to make the strategy effective. We are concerned at the significant change in strategy between the Preferred Option Core Strategy and the Submission version, which has significantly less housing growth on green field sites. This change in strategy is so significant that we would question whether it is appropriate in the context of soundness and the consultation processes that have taken place so far.

We also have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with other policies in the SCS and feel that Green Belt review should be more explicit throughout the SCS. As it currently stands there is a potential conflict with national policies and limited justification for the Green belt strategy. We note that in Policy H3, which indicates the need for Green Belt land review, the advice is limited and unclear. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H3 and Policy GB1/H2 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary. Not to do so is unsound for justification and effectiveness reasons.

Policy H4 - Affordable Housing

As currently drafted we feel that the policy is not concise enough and that the policy does not reflect current guidance. The phrase 'at least' would indicate that in most cases affordable housing above 35% will be sought. Our understanding is that the 35% figure is recommended in the SHMA and that to provide a policy framework which seeks to go beyond that figure would potentially be unworkable as many sites could not financially bare the burden of over a third of the net developable area not yielding a value. The policy should be redrafted so that "a target of 35% affordable housing shall be provided on all developments of 15 or more units..."

The last policy paragraph provides some scope to relax this policy, if there are clear site constraints that make on site provision impossible. The policy, though, is not particularly clear on what would constitute exceptional circumstances. For example, physical site constraints, which unusually raise development costs, would be one such reason and this should be specified. There may be other reasons including the nature of housing needs in the part of the District the site is located which justify affordable housing below the 35% target. Design reasons may also have a bearing on how provision is made and in what form, particularly if the site is in an historic area where design might override housing need argument. It is therefore recommended that the policy expand on the type of circumstances where affordable housing may be relaxed and the type of information that will be sought of applicant's who have a need to invoke this part of the policy.

Policy H5

In support of the policy, it is advantageous that no percentages requiring a specific mix are included. This flexibility will enable developers and the Council to respond directly to changing circumstances in the local housing market. In the past some authorities have set out a percentage for the type of housing they require only to find that after a few years of strict implementation there is an oversupply of property of that type and no flexibility in the policy to address the problem.

Policy ED2 - London Southend Airport

It is considered that to grow non aviation related employment at a location north of Southend Airport where sustainable access from the rest of Rochford District requires careful consideration. Most Airports are serviced by aviation related employment development and as such a location close to the airport is sensible and sustainable. However, for surface access reasons it would be inappropriate to encourage travel from Rochford's main settlements to what essentially

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would be a rural location for general employment uses. Whilst sustainable access would be improved by a railway station and better bus links, there is no evidence to suggest that a sustainable surface access strategy for non related employment development at the Airport can be achieved. Paragraph 11.22 explains the critical importance of a railway station to the delivery of the strategy yet the Transport Chapter and Implementation Chapter provide neither a policy nor an assessment of deliverability. It is also notable that the South Essex Rapid Transit Policy T4, as set out at paragraph 10.16, notes that Rochford is not proposed to be served but may be served in future phases. This uncertainty is no way to plan for a major employment land supply strategy in the District. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley/Hawkwell, Rochford and Rayleigh is unsound.

Policy ED3

We fully support the first sentence of the Policy and note the apparent contradiction with the statements in Policy H1 and elsewhere which seeks to develop on alternative uses at industrial estates such as Eldon Way.

This contradiction is evidence in the second paragraph of Policy ED3. In our representations on Policy H1 we have explained why it is not sound to diminish the employment stock at Eldon Way and the importance of maintaining a dominance of employment type uses at this estate. These arguments are not repeated here.

We note the sentiments of the third paragraph and in accordance with our representations elsewhere are of the view that this sentence should be revised to explain that Eldon Way will accommodate principally employment type uses. As noted elsewhere uses which are an alternative to employment would diminish this highly sustainable employment site and this is unsound when assessed against National Policy.

Policy ED4 - Future Employment Allocations

In part, the de-allocation strategy is not supported as it is considered unsound when set against sustainability criteria. In relation to the Eldon Way Industrial Estate it is considered critical to the ongoing sustainability of this settlement that employment uses are maintained at this location. It is close to the railway station, bus routes and local residential areas from which the opportunity exists for employees to walk or cycle to work. Its location adjacent to the Town Centre offers opportunity for some retail and leisure development to complement the centre and to maintain a supporting function. These sustainable benefits would not occur with the deallocation of Eldon Way or the significant erosion of its employment floorspace. Whilst redevelopment of the employment site to achieve new employment is supported, the dominant land use should continue to be employment use. As a consequence, the 18ha of land required for employment in this policy is considered to be excessive and the policy should be reviewed to explain that redevelopment of existing employment sites for primarily new employment development will be encouraged.

Policy T4

It is noted that the South Essex Rapid Transit policy, as elaborated upon at paragraph 10.16 notes that Rochford is not served but may be served in future phases. This uncertainty is contrary to the delivery principles of soundness and directly puts at issue the employment land supply strategy in the District which is founded on sustainable access to new sites. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley, Rochford and Rayleigh is unsound.

Appendix H1, CTL1 - Infrastructure

It is recognised that necessary infrastructure provision is an important part of creating a sustainable development and in that context appendix H1 is supported. The supporting text notes that the table at Appendix H1 is not exhaustive and in that context it is very important that the framework properly distinguishes between what should be provided as part of new development schemes and what shouldn't. It is therefore essential that the framework acknowledges the importance of Circular 05/05 and the tests which say that provision of infrastructure and/or contributions should be:

- * Relevant to planning
- * Necessary to make the proposed development acceptable in planning terms
- * Directly related to the proposed development
- * Fairly and reasonably related in scale and kind to the proposed development
- * Reasonable in all other respects

As is made clear (Paragraph B9 of Circular 5/05) contributions should not be used to make good existing deficiencies in infrastructure provision. Nor are they to be used to secure contributions to the achievement of wider planning objectives that are not necessary for consent to be granted. In that context the Core Strategy should set this out as its policy framework.

Policy GB1 - Green Belt

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The objectives of this policy are supported, although as noted in other representations the SCS is unsound as it does not meet the tests in relation to justification, compliance with national policy or effectiveness of strategy.

Policy GB1 mentions the objective to allocate the minimum amount of Green Belt land necessary. The policy should link to the requirements of PPG2 and RSS which are discussed in relation to the representations on Policy H2 and H3. The policy should set out a timeframe for the review and why Rochford requires a Green Belt review (what the exceptional circumstances are in this District that justify a review of local boundaries. The policy should be amended to set out a 2031 time frame and this may require the SCS to have an extended life span beyond 2021.

We would recommend the deletion of the word character since Green Belt designation is not related to landscape character as currently drafted. For clarity we would also recommend that the Policy or its supporting text explain that a Green Belt review will take place in support of an allocations document (paragraph 6.6) in order to identify an appropriate new boundary. This is particularly necessary given the commitment to a Green belt review in the adopted Local Development Scheme.

Policy CLT1 - Planning Obligations and Standard Charges

In view of the need to test fully the basis on which standard charges are based it is important that any document produced is in a development plan document that enables an examination in public. The policy should explain this in order that when the document is produced it accords with Policy and is based on sound evidence.

ENV9 - Code for Sustainable Homes

Object. The advice from the Department of Communities and Local Government is that the new requirement to have a rating against the Code does not make it mandatory to build a Code home or to have each new home assessed against the Code. It does however mean that all buyers of new homes be given clear information about the sustainability of the new home. A house builder can do this in one of two ways:

- they can choose to build a Code home, have that home assessed against the Code and provide the home buyer with a Code certificate stating the star rating the home has achieved
- or, they can choose to build to current building regulations standards, not to pay for an assessment and instead download a nil-rated certificate of non-assessment (also referred to as a nil-rating) to provide to the home buyer.

As such the Rochford policy requirement that coding 3 be achieved by 2010 and Code 6 by 2013 is out of step with Government advice. The policy wording should explain that it is just the coding that is a requirement of new homes and not necessarily that new homes should be constructed to achieve a standard.

The current Government objectives are for the code to be introduced over a reasonable period with development to be code 3 by 2010, code level 4 by 2013 and code level 5 by 2016. In this regard the policy, as drafted, seeks to achieve code 6 by 2013 and consequently compresses the code requirements into a shorter time scale with the costs associated expected to be subsumed within the housing market through higher prices. This is not a realistic strategy for the delivery of sustainable homes and we consider that the policy should be revised to extend the period of compliance but to also make it more flexible based on local circumstances.

Research undertaken on behalf of the Housing Corporation and English Partnerships, published in February 2007 'A cost review of the code for sustainable homes' reveals that code 6 is unlikely to be unattainable given existing technologies and that achieving code 5 could result in a 12% to 20% increase in costs that would have to be passed onto the consumer. Given the variability of the housing market with peaks and troughs, it is unlikely that the housing market would be able to subsume this level of price increase.

The code system policy as currently drafted does not have regard to site circumstances and so many of the requirements could be difficult to meet. For example, micro electricity generation on site may be difficult to achieve where local circumstances deter the capture of wind or solar power. If more expensive technologies are required to generate power than is the norm then costs will rise. There may be other competing reasons why designs cannot include certain sustainability measures if housing sites are in sensitive landscape and historic locations. Alternatively there may be significant development costs associated with site specific circumstances and so viability of the site's development becomes a valid consideration. By insisting on the code for sustainable homes other policy objectives such as affordable housing at particular rates and other contributions may need to be reconsidered. Consequently, we are of the view that this policy should be drafted in a manner which enables site specific circumstances to be taken into account. As noted above the Government explains that the code is a certification requirement and does not necessarily mean that buildings are constructed in accordance with a code level.

It is also important to note that it is not the purpose of planning legislation to duplicate other legislation. In this regard, the policy should accept that the Building Regulations will be the main vehicle for implementing this policy and that unless the coding requires external development then there will be no need to specify what is to be carried out in a planning application.

Core Strategy Submission Document

S - 16927 - 10009 - Appendix H1 - None

16927 Support

CHAPTER 4 Appendix H1

Summary: Appendix H1, CTL1 - Infrastructure

It is recognised that necessary infrastructure provision is an important part of creating a sustainable development and in that context appendix H1 is supported. The supporting text notes that the table at Appendix H1 is not exhaustive and in that context it is very important that the framework properly distinguishes between what should be provided as part of new development schemes and what shouldn't. It is therefore essential that the framework acknowledges the importance of Circular 05/05 and the tests which say that provision of infrastructure and/or contributions should be:

- * Relevant to planning
- * Necessary to make the proposed development acceptable in planning terms
- * Directly related to the proposed development
- * Fairly and reasonably related in scale and kind to the proposed development
- * Reasonable in all other respects

As is made clear (Paragraph B9 of Circular 5/05) contributions should not be used to make good existing deficiencies in infrastructure provision. Nor are they to be used to secure contributions to the achievement of wider planning objectives that are not necessary for consent to be granted. In that context the Core Strategy should set this out as its policy framework.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 15938 - 9032 - Appendix H2 - ii

15938 Object

CHAPTER 4 Appendix H2

Respondent: Essex Chambers of Commerce (Mr John Dallaway) **Agent:** N/A
[9032]

Essex Chambers of Commerce
2nd Floor,
Viscount House,
London Southend Airport, Southend-on-Sea.
Essex.
SS2 6YF
01702-560100

Full Text: The breakdown table of 2001-2021 housing trajectory by source anticipates 125 housing units to come from redevelopment of identified employment allocations in both 2010/11 and 2011/12. Do not believe that this is deliverable within the suggested timescale.

Summary: The breakdown table of 2001-2021 housing trajectory by source anticipates 125 housing units to come from redevelopment of identified employment allocations in both 2010/11 and 2011/12. Do not believe that this is deliverable within the suggested timescale.

Change to Plan The 2001-2021 housing trajectory will need to reassessed and adjusted accordingly.

Appear at exam? No

Soundness Tests ii

Core Strategy Submission Document

O - 16073 - 9599 - Appendix H2 - i, ii

16073 Object

CHAPTER 4 Appendix H2

Respondent: Mrs Fiona Jury [9599]

WGDP Ltd
Cross Keys House
22 Queen Street
Salisbury
SP1 3EY

Agent: N/A

Full Text: The housing trajectory includes provision for sites identified in the SHLAA to come forward in 2010, 2011, 2012 & 2014/15. Approximately 50% of dwellings to be delivered from this source, comprise existing employment sites that have been identified for redevelopment. On closer examination of these sites, which are the subject of separate representations to Policy ED3, they would not appear to be entirely deliverable. Their inclusion in the housing trajectory has not been founded on a robust or credible evidence base, and is therefore unjustified.

Summary: The housing trajectory includes provision for sites identified in the SHLAA to come forward in 2010, 2011, 2012 & 2014/15. Approximately 50% of dwellings to be delivered from this source, comprise existing employment sites that have been identified for redevelopment. On closer examination of these sites, which are the subject of separate representations to Policy ED3, they would not appear to be entirely deliverable. Their inclusion in the housing trajectory has not been founded on a robust or credible evidence base, and is therefore unjustified.

Change to Plan The proposed supply of housing land derived from the SHLAA 2009 is flawed by virtue of the inclusion of existing employment sites that are undeliverable during the time period proposed. On this basis, the DPD fails the test of soundness. In order to make the DPD sound, sites which are 'available' need to be included in the housing trajectory to replace this source; this is likely to require an earlier Green Belt release. Additional sites within the Green Belt in sustainable locations for housing need to be identified

Appear at exam? Yes

Soundness Tests i, ii

Core Strategy Submission Document

O - 16464 - 7507 - Appendix H2 - ii

16464 Object

CHAPTER 4 Appendix H2

Respondent: Mr S Welsh [7507]

Hanover Land Trust
35 Castle Road
Rayleigh
Essex
SS6 7QD

Agent: N/A

Full Text: We consider the DPD is potentially unsound depending on the final selection of specific sites or site in South West Hullbridge.

Please see attached statements 1, 2, 3 and 4 evidential statement.

The precise wording should correlate to the proposal of the attached statements, although the issue may be resolved by publication of the allocations development plan document.

Oral participation will depend on whether the proposed site is included in the allocation development plan document for specific sites for future development, if the proposed site is included oral participation will not be required or necessary.

Summary: We consider the DPD is potentially unsound depending on the final selection of specific sites or site in South West Hullbridge.

Please see attached statements 1, 2, 3 and 4 evidential statement.

Change to Plan The precise wording should correlate to the proposal of the attached statements, although the issue may be resolved by publication of the allocations development plan document.

Appear at exam? Yes

Soundness Tests ii

Core Strategy Submission Document

O - 16560 - 8324 - Appendix H2 - i, ii, iii

16560 Object

CHAPTER 4 Appendix H2

Respondent: Mr J Needs & Aston Unit Trust [8324]

C/o Sellwood Planning
Stoughton Cross House
Stoughton Cross
Wedmore
Somerset
BS28 4QP

Agent: Sellwood Planning (Mr R M Sellwood) [5054]

Sellwood Planning
Stoughton Cross House
Stoughton Cross
Wedmore
Somerset
BS28 4QP

Full Text:

The trajectory is unsound for the following reasons

- the submission version of the Core Strategy has been published in advance of the SHLAA
 - it does not set out a trajectory for at least fifteen years from the date of the adoption of the Core Strategy
 - it assumes that all extant permissions will be completed by 2010
 - it is unclear whether the trajectory assumes the full residential redevelopment of all the employment sites listed in Policy ED3.
- Policy ED3 notes that these employment areas can be redeveloped for "appropriate alternative uses", which "may include a proportion of employment uses". The permissive nature of this policy may mean that these sites are not redeveloped for residential uses. Indeed, in the current recession, the owners of some of these sites may prefer a continued and consistent income from an employment use to a residential land value which is depressed by the recession, the level of proposed S106 costs and affordable housing
- there is no evidence that the employment sites will start to produce dwelling completions in 2010. These employment sites generally have delivery constraints in terms of multiple leases, potential contamination and issues relating to the relocation of displaced employment occupiers. For these reasons, the trajectory is over optimistic in assuming that the first completions will occur in 2010 and applies a spurious level of precision in specifying annual completion rates thereafter
 - the SHLAA site summary is over optimistic in terms of its assessment of the availability of previously developed sites within the urban areas.

Taken together, these comments mean that the trajectory does not comply with national guidance and, as a consequence, it fails to be either effective, justified or consistent with national policy.

The trajectory needs to be recast

- extending its period to at least 2025
- inserting more realistic completion rates for extant permissions, the former employment sites and the number of appropriate sites identified in the SHLAA.

It is considered that our participation at the oral part of the public examination would assist the Inspector for two main reasons

- Sellwood Planning has a detailed knowledge of the Rochford area, appeared at the last Local Plan Inquiry and was a participant at the RSS public examination. This direct knowledge of the local area and the statutory Development Plan may be of assistance to the Inspector
- Sellwood Planning has experience in promoting major schemes through Core Strategies (eg. 7,000 dwellings in Ashford, 5,750 dwellings in Dover, 2,500 dwellings in Horsham and 1,200 dwellings in Newmarket) and the emerging body of evidence of what constitutes a sound Core Strategy and what is unsound. Our experience indicates that, in a number of respects, the submitted Core Strategy is unsound in its present form.

Summary:

The trajectory is unsound for the following reasons

- the submission version of the Core Strategy has been published in advance of the SHLAA
 - it does not set out a trajectory for at least fifteen years from the date of the adoption of the Core Strategy
 - it assumes that all extant permissions will be completed by 2010
 - it is unclear whether the trajectory assumes the full residential redevelopment of all the employment sites listed in Policy ED3.
- Policy ED3 notes that these employment areas can be redeveloped for "appropriate alternative uses", which "may include a proportion of employment uses". The permissive nature of this policy may mean that these sites are not redeveloped for residential uses. Indeed, in the current recession, the owners of some of these sites may prefer a continued and consistent income from an employment use to a residential land value which is depressed by the recession, the level of proposed S106 costs and affordable

Core Strategy Submission Document

O - 16560 - 8324 - Appendix H2 - i, ii, iii

16560 Object

CHAPTER 4 Appendix H2

housing

- there is no evidence that the employment sites will start to produce dwelling completions in 2010. These employment sites generally have delivery constraints in terms of multiple leases, potential contamination and issues relating to the relocation of displaced employment occupiers. For these reasons, the trajectory is over optimistic in assuming that the first completions will occur in 2010 and applies a spurious level of precision in specifying annual completion rates thereafter

- the SHLAA site summary is over optimistic in terms of its assessment of the availability of previously developed sites within the urban areas.

Taken together, these comments mean that the trajectory does not comply with national guidance and, as a consequence, it fails to be either effective, justified or consistent with national policy.

Change to Plan

The trajectory needs to be recast

- extending its period to at least 2025
- inserting more realistic completion rates for extant permissions, the former employment sites and the number of appropriate sites identified in the SHLAA.

Appear at exam? Yes

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 16822 - 9676 - Appendix H2 - i, ii, iii

16822 Object

CHAPTER 4 Appendix H2

Respondent: Bellway Homes [9676]

Bellway Homes
Bellway House
Bury Street
Ruislip
Middlesex
HA4 7SD
UK

Agent: Barton Willmore LLP (Mr E Hanson) [14266]

Barton Willmore LLP
7 Soho Square
London

W1D 3QB

020 7446 6888

Full Text:

See statement

Council ref AE18 and AE18a

Summary:

See statement

Council ref AE18 and AE18a

Change to Plan

See statement

Council ref AE18 and AE18a

Appear at exam? Yes

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 16836 - 9912 - Appendix H2 - i, ii

16836 Object

CHAPTER 4 Appendix H2

Respondent: M D Smith & Son [9912]

M D Smith & Son
Hambro Nurseries
Chelmsford Road
Battlesbridge
Wickford
SS11 8SY

Agent: Andrew Martin Associates Ltd (Mr David Maxwell)
[9911]

Andrew Martin Associates Ltd
Croxtan's Mill
Little Waltham
Chelmsford
Essex
CM3 3PJ
01245 361611

Full Text: We submit that Appendix H2 of the Core Strategy is unjustified. The housing trajectory is far too optimistic and overly reliant on 'fictitious figures' from the Annual Monitoring Report. We submit that the rate of housing delivery will fall considerably short of the annual estimates provided, particularly for the next five to ten years. The timescales required to deliver the proposed redevelopment of the four major employment sites are likely to be considerably greater than estimated in the Core Strategy.

Supporting document received Council ref AE23.

The table provided at appendix H2 of the Core Strategy should make it clear that the 'projected annual completions' are based on 'fictitious figures' drawn from the Annual Monitoring Report. Text should be introduced within the Core Strategy to make clear that the Council will adopt a flexible approach to ensure that housing requirements are achieved.

Summary: We submit that Appendix H2 of the Core Strategy is unjustified. The housing trajectory is far too optimistic and overly reliant on 'fictitious figures' from the Annual Monitoring Report. We submit that the rate of housing delivery will fall considerably short of the annual estimates provided, particularly for the next five to ten years. The timescales required to deliver the proposed redevelopment of the four major employment sites are likely to be considerably greater than estimated in the Core Strategy.

Supporting document received Council ref AE23.

Change to Plan The table provided at appendix H2 of the Core Strategy should make it clear that the 'projected annual completions' are based on 'fictitious figures' drawn from the Annual Monitoring Report. Text should be introduced within the Core Strategy to make clear that the Council will adopt a flexible approach to ensure that housing requirements are achieved.

Appear at exam? No **Soundness Tests** i, ii

Core Strategy Submission Document

O - 16182 - 9816 - Character of Place - i, ii, iii

16182 Object

CHAPTER 5 Character of Place

Respondent: Stuart Tennison [9816]

11 Ely Way
Rayleigh
Essex
SS6 9TR
England

Agent: N/A

Full Text: Proposed development in Rawreth area will have significant impact on the character of both Rayleigh and Rawreth. Loss of greenbelt will reduce the rural town character, and blur boundaries with neighbouring towns/villages. The added sprawl will also disconnect the residents from the heart of the town.

Summary: Proposed development in Rawreth area will have significant impact on the character of both Rayleigh and Rawreth. Loss of greenbelt will reduce the rural town character, and blur boundaries with neighbouring towns/villages. The added sprawl will also disconnect the residents from the heart of the town.

Change to Plan Review policy or greenbelt development

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16116 - 14160 - Introduction, 5.1 - i, iii

16116 Object

CHAPTER 5 Introduction, 5.1

Respondent: Cllr Chris Black [14160]

56 Love Lane
Rayleigh
Essex
SS67DX

Agent: N/A

Full Text: National policy PPS3 requires that new development should maintain and improve local character. However the proposals for 'Land north of London Road' would damage the character and identity of the parish. This is recognised by the "Sustainability Appraisal" which recognises "A significant negative effect on community and identity". As stated before, the proposals for this land are UNSOUND.

Summary: National policy PPS3 requires that new development should maintain and improve local character. However the proposals for 'Land north of London Road' would damage the character and identity of the parish. This is recognised by the "Sustainability Appraisal" which recognises "A significant negative effect on community and identity". As stated before, the proposals for this land are UNSOUND.

Change to Plan Other, smaller, brownfield sites could be used as an alternative to 'land North of London Road'

Appear at exam? Yes

Soundness Tests i, iii

Core Strategy Submission Document

S - 15976 - 13441 - Design, 5.4 - None

15976 Support

CHAPTER 5 Design, 5.4

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: It is unclear whether it is the adoption of modern materials and design, or the erosion of character that "must not be allowed"

Summary: It is unclear whether it is the adoption of modern materials and design, or the erosion of character that "must not be allowed"

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16723 - 7834 - Design, 5.4 - i

16723 Object

CHAPTER 5 Design, 5.4

Respondent: Ms G Yeadell [7834]

6 Southend Road
Hockley
Essex
SS5 4QQ
01702 205450

Agent: N/A

Full Text: Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1

Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2 you discarded N.E.Hockley as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley..along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

Response to C.S Preferred Options 2008 and HAAP 2009

June 2009 issue C S Submission issue says Eldon Way will be used for housing, whereas Sept.2009 issue says "alternative uses, including residential.." to be decided by HAAP (Issues consultation done, Pref.Options issue awaited, but judging from JAAP Pref.Options decision - namely biggest option chosen against overriding opposition, it will be housing).

Need to be logical and even-handed in proposals

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

Establish likely level of Standard Charges. Accept you cannot turn district into motorways with wholesale demolition.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

Para.10.5 "..highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which cannot be altered without much destruction.

Reply to CS Pref. Options 2008 & HAAP Issues/Options 2009

Policy T3, CLT1 Appendix CLT1 Public transport RDC admits this is in the private sector. In Hockley, operator has cut No7 service to 1 per hour from Ashingdon Schools, claiming it is unviable beyond. This is unlikely to change as Hockley is car dependant. No8 bus through Hawkwell is cut to 1 per hour to Rayleigh, for same reason as No7. Proposed planning agreements with developers can't run: eg, a community centre or classroom given by a developer remains once he has moved on - how can that apply for an on-going bus service?

Reply to Infrastructure Transport in CS Pref. Opts. 2008 and to HAAP Issues Opts. 2009.

Ch.11 Economic development

Policy ED3 Core Strategy preferred Options 2008 hinted at possible housing in Eldon Way site. June 2009 Submission version, without consultation, said Eldon Way would be housing (map included Foundry, not the text). September 2009 Submission said redevelopment would be in HAAP (which apart from the Issues/Options version, is unfinished. Judging from results of JAAP Preferred Options where biggest option is chosen, though most respondents were against it, site will be housing, without consultation.

16723 Object

CHAPTER 5 Design, 5.4

Para.1.25, Para.11.32 Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to accommodated employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

Reply to HAAP Issues Options 2009

Remove compulsory relocation

Policy ED4 Policy states Council will allocate 18ha of land to make up for de-allocations in ED3 - that proves point above.

Proposals for moving employment to out of town locations with no existing transport links are contrary to government policies PPG4, PPS1 and PPS4 and Core Strategy Policy T1.

Evidence Base is ignored by contravening Hockley Parish Plan 2007 and ignoring residents' views on HAAP Issues/Options. Next stage of HAAP Preferred Options is pre-empted and rendered irrelevant. Core Strategy plans to relocate Eldon Way Foundry estate to Greenfield site with no nearby bus or railway. RDC plans to upgrade the nearest road to dual carriageway, though the connecting B1013 (through Hockley) will stay single, said by ECC Highways statistics to be 72% capacity. Airport bosses and council cannot suggest there will be no traffic growth from JAAP and new industrial site.

Reply to Hockley Parish Plan 2007. HAAP Issues 2009

Move to new industrial site near airport contravenes PPS4:

- EC7.3C "out of centre sites, with preference given to sites...well served by choice of...transport and...close to centre and...high likelihood of forming links with centre". There is no current public transport and links with centres is unlikely".

- EC 7.5.1 "whether the site is or will be accessible and well served by choice of transport, public transport, walking and cycling, as well as by car...". Remote location, narrow busy B1013 makes the site unsuitable for access by cycle or on foot.

It also contravenes PPS1 (27vii)... "reduce need to travel, encourage accessible public transport provision to secure more sustainable patterns of transport...Planning should actively manage patterns of urban growth to make fullest use of public transport and focus development in existing centres, near to major public transport interchanges". Core Strategy undermines its own policy Transport and Highways policy T1 and is unsound.

Although shown on accompanying drawing in earlier versions, there was no prior textual mention of Foundry industrial estate (next to Eldon Way) for redevelopment until current CS 2009 Submission. This was stated to be a typing error, but does not inspire confidence in reliability of drafting.

Revise both 2009 Core Strategy and 2009 HAAP Issues/options

Chapter 12: Retail/Town centres

The Core Strategy misrepresents findings of the Retail and Leisure Study 2008.

Para.12.38 The Core Strategy states (para.12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace."

Whereas the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure".

2) (10.28) "There is no immediate capacity for additional floorspace".

3) (10.29) "we recommend focus be maintained on developing Hockley's existing strengths, rather than retail expansion"

4) 10.31 "the current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it has a very small catchment population. Accordingly, the council may wish to consider reclassifying Hockley from a town centre to a district centre".

Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

The Council will work with landowners and its partners to deliver the HAAP.

Remove threat of compulsory purchase orders.

16723 Object

CHAPTER 5 Design, 5.4

One doesn't perceive impartiality when the Planning Director replies to local HAAP survey with "The affluent people of Hockley are entitled to famous name shops".

Chapter 5: Character of Place and Local Lists

Para.5.4 "Rochford district has unique character..stems from traditional buildings..still dominate towns and villages".

Para.5.17 "Council believes many buildings..are of local distinctiveness..part of..cherished local scene".

This only applies to favoured places: Rochford, Rayleigh, greenbelt villages. Many Hockley conservable items have been systemically removed for supposedly lucrative development in face of widespread protect. This is for supposed need for housing. In fact heritage items have been replaced by dwellings most cannot afford, and/or are hard to sell due to unsuitability of massing and siting. Many other homes are jeopardised by this practice.

HAAP issues 2009. Core Strategy 2006, 2007,2008, SCI.2006

Fewer 'vested interests', more even handedness. No more pressing people out of businesses, homes for expediency.

A CPRE Fieldwork issue extolled Local Lists, citing refusal of 16 flats to replace character house, not on local list. Inspector said house, facade made a contribution to area character, even if English heritage decided it didn't warrant listing. Council worked to get the house grade listed and even made adjacent area conservation one.

Hockley had one such on a "significant site" faced with 13 flats. Ward Member omitted house from refusal proposal, so house could be demolished. RDC dropped Local List ahead of appeal: "Government frowned on such Lists" (Other LAs, unaware of supposed directive retained theirs. After demolition RDC restored Local Lists, saying Government now support them. When Inspector queried the complaint, the then policy officer said "just politics, lot of local interest, nothing of character in the area[!]. (A dozen such items had been removed). Some "distinctive" Hockley buildings are still condemned (in Greensward Lane.; others threatened (Spa Road). Whereas a modest hue and cry in Rayleigh will usually result in a building being saved.

Conclusion

Core Strategy Submission DPD is basically unsound in many respects

Incomplete information. Amongst others, it refers to Hockley AAP, the first stage of which is complete, but not other three. Rochford AAP first stage has been published in arrears of Core Strategy Submission. Rayleigh AAP is still awaited. Precise housing sites are absent, as Urban Capacity Study 2007 has been superseded by Strategic Housing Land Availability Assessment, not yet published. Traders, residents, are thus responding to Core Strategy Submission with incomplete information.

Lack of community involvement. Chapter 1, Introduction, para. 1.11 "Community involvement is an essential part of the plan making process".

In Statement of Community Involvement 2006 Rochford RDC "recognises need to enable people to have their voices heard".

Re Public Meetings: "Consideration will be had to timing and venue to ensure meeting is as accessible as possible".

Take Hockley Area Action Plan as an example of the opposite of all this:- Presentation of document was at Hullbridge, 7.30pm. It was also discussed with JAAP at Rochford Freight House (for traders only) at 7am, without publicity. Excuse made: HAAP on RDC website, which none will seek unless knowing it is there. Rochford District Matters newsheet had minute articles on p.3, half way through consultation period. Another excuse: a 2nd presentation by Hockley Residents Association with planning officer present: only because of complaints, and it is not the HRA's responsibility to RDC's job. Due to unavoidable haste of calling meeting, few knew and only 50 were present.

In Core Strategy Submission Hockley Parish Plan has been ignored. Proposals also ignore 95% rejection rate response to HAAP 2009, which included proposals for Eldon Way employment site.

Unfettered right of developers to carry on as if Core Strategy didn't exist. In PPS 12, Ch.4.6 states: "Core Strategies should be flexible and able to show how they handle contingencies". Several large planning applications have been submitted proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS 12.

Where are we? Finally, at Chapter 1, Introduction, para. 1.24: "the Core Strategy will have to be reviewed in the event of a new Local Area Agreement, post-2011, setting different priorities". So what purpose does all this work serve? So we have hardly finished this exercise, before it all starts again?

Summary:

Chapter 5: Character of Place and Local Lists

Para.5.4 "Rochford district has unique character..stems from traditional buildings..still dominate towns and villages".

Core Strategy Submission Document

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CHAPTER 5 Design, 5.4

Para.5.17 "Council believes many buildings..are of local distinctiveness..part of..cherished local scene".

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Change to Plan Fewer 'vested interests', more even handedness. No more pressing people out of businesses, homes for expediency.

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16764 - 14229 - Design, 5.4 - i, iii

16764 Object

CHAPTER 5 Design, 5.4

Respondent: Hockley Under Threat (J Abbey) [14229]

Hockley Under Threat
None provided

Agent: N/A

Full Text: Ch. 4 Housing; Ch.10 Transport, Highways; Ch.11 Economic Development; Ch.12 Retail/town centres; Ch.5 Character of place & Local Lists

Chapter 4: Housing

Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1, Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2

N.E.Hockley was discarded as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley...along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

Need to be logical and even-handed in proposals

June 2009 issue C S Submission issue says Eldon Way will be used for housing, whereas Sept.2009 issue says "alternative uses, including residential.." to be decided by HAAP (Issues consultation done, Pref.Options issue awaited, but judging from JAAP Pref.Options decision - namely biggest option chosen against overriding opposition, it will be housing).

Policy H1, T1 Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG14 & PPS1. it also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths",

The Core Strategy also contravenes its own policy T1 and is unsound.

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

Establish like motorways with wholesale demolition.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts.

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Para.10.5

Policy T3, CLT1 Appendix CLT1

T1 & T2 "...highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which

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CHAPTER 5 Design, 5.4

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Para.1.25 Para.11.32

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Remove compulsory relocation

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H1 & RTC6 Although shown on accompanying drawing in earlier versions, there was no prior textual mention of Foundry industrial estate (next to Eldon Way) for redevelopment until current CS 2009 Submission. In recent amendment to the CS this was stated to be due to a typing error!

Chapter 12: Retail/Town centres

The Core Strategy misrepresents findings of the Retail and Leisure Study 2008.

Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

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Core Strategy Submission Document

O - 16764 - 14229 - Design, 5.4 - i, iii

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Chapter 5: Character of Place and Local Lists

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Conclusion

Core Strategy Submission DPD is basically unsound in many respects:

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Where are we? Finally, at Chapter 1, Introduction, para. 1.24: "the Core Strategy will have to be reviewed in the event of a new Local Area Agreement, post-2011, setting different priorities". So what purpose does all this work serve? So we have hardly finished this exercise, before it all starts again?

Summary:

"Rochford district has unique character..stems from traditional buildings..still dominate towns and villages".
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This only appears to apply to certain places: Rochford, Rayleigh, greenbelt villages. Many Hockley conservable items have been systemically removed for supposedly lucrative development in face of widespread protect. This is for supposed need for housing. In fact heritage items have been replaced by dwellings most cannot afford, and/or are hard to sell due to unsuitability of massing and siting. Many other homes are jeopardised by this practice.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i, iii

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

Core Strategy Submission Document

O - 16252 - 9177 - Policy CP1 - Design - i

16252 Object

CHAPTER 5 Policy CP1 - Design

Respondent: Colonnade Land LLP [9177]

Colonnade Land LLP
Fifth Floor
17-19 Maddox Street
London
W15 2QH
020 7255 7490

Agent: Icen Projects Limited (David Churchill) [10057]

Icen Projects Limited
83 Victoria Street
London
SJ1H 0HW

Full Text: ROCHFORD DISTRICT COUNCIL - LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY SUBMISSION
SEPTEMBER 2009

Icen Projects Ltd (Icen) has been instructed by Colonnade Land LLP (Colonnade) to submit representations to the Rochford Local Development Framework Core Strategy Submission (CSS).

a) Overview

It is our conclusion that the CSS is not justified, effective or consistent with national policy, as required by Planning Policy Statement 12: Creating Strong Safe and Prosperous Communities through Local Spatial Planning (PPS12) and is therefore vulnerable to being found unsound by an Inspector through the Examination in Public.

b) Background and Summary

These representations follow those made by Icen on behalf of Colonnade to the Preferred Options Core Strategy, submitted via letter dated 17 December 2008. In this regard, we would request that the Council confirms that the representations made to the Preferred Options Core Strategy will be taken into account alongside the current representations, particularly as there are a number of cross references between the two sets of representations.

It is not considered necessary to reiterate the content of the previous representations, as they were made at the appropriate stage and will be considered by the Planning Inspectorate in due course, but it is inevitable that certain elements will require restating where it is not clear that they have been taken into account in the production of the CSS. For clarity, therefore, Colonnade feel that it is appropriate to clarify the 'in-principle' issues that were raised in the representations to the Preferred Options Core Strategy, recognising that these issues were raised in the context of a wider and more coherent justification made within the representations:

- â€¢ Further cross-referencing of the recommendations made within the evidence base is required;
- â€¢ Greater focus should be placed on promoting Rochford as the principal settlement within the District;
- â€¢ Coombes Farm is the most logical location for residential development abutting the urban area of Rochford and as such warrants recognition as a general location for residential development;
- â€¢ The allocation of Three Ashes Farm for employment generating uses will be pursued;
- â€¢ Recognition that it is not realistic to expect residential allocations to be met mainly on Brownfield sites, nor should the intensification of smaller sites in residential areas be pursued;
- â€¢ Many of the sites identified as suitable for residential development will not be viable and will not come forward for development within the timescales anticipated;
- â€¢ The failure to provide the necessary justification for the proposed infrastructure improvements sought in Appendix H1;
- â€¢ The inclusion of an affordable housing exception policy was sought; and
- â€¢ The need to identify sites capable of delivering employment growth in the short term.

Following assessment of the CSS presented by the Council for consultation prior to submission to the Secretary of State, Colonnade considers the Plan to be 'unsound' as the document consistently fails to meet the tests of soundness set out in the table following Paragraph 4.52 of PPS12. For clarity, PPS12 confirms that to be 'sound' a Core Strategy should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY and defines 'justified' as "founded on a robust and credible evidence base" and "the most appropriate strategy when considered against the reasonable alternatives" and 'effective' as "deliverable", "flexible" and "able to be monitored".

The rationale for the above is identified in the remainder of these representations, which are provided in the interests of ensuring the Council delivers a strong, robust and logical Core Strategy that guides the future development of the District in a justified and effective manner.

b) Colonnade

As the Council is aware from previous submissions to the Local Development Framework, Colonnade is a strategic land company with a particular interest in the future development of the District as a consequence of a number of sites that it controls, particularly around Rochford.

The Council will also be aware that Colonnade has recently submitted an outline planning application for the residential development of the land at Coombes Farm, Rochford to provide a sustainable urban extension comprising up to 326

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CHAPTER 5 Policy CP1 - Design

residential dwellings, with associated accesses and community uses. Whilst the planning application process is clearly separate from the Local Development Framework production process, Colonnade wishes to continue the promotion of the site as a suitable location for residential development.

Accordingly, these representations focus on the legal requirements and tests of soundness associated principally with the Housing and Employment chapters of the CSS, with reference where appropriate to the sites that are controlled by Colonnade, the outline planning application at Coombes Farm and other issues where relevant.

c) Housing

i. Date of Adoption

The CSS assumes an adoption date of 2010 and plans for the provision of housing to 2025.

Taking account of the potential delays to the adoption of the Plan, including the Examination process, it would be more appropriate for the CSS to provide sufficient flexibility to allow for delays in its adoption. Colonnade considers an adoption date of 2011 for the CSS is a more realistic target.

Taking account of the advice in Paragraph 4.13 of PPS12, which states that the time horizon for the Core Strategy should be "at least 15 years from the date of adoption" it would be appropriate for the CSS to plan for the provision of housing to 2026 at the earliest. As such, Colonnade does not consider the CSS to be 'flexible' in the context of the tests of soundness in the table following Paragraph 4.52 of PPS12.

ii. Housing Delivery

However, setting the above aside, the Housing Chapter identifies the minimum housing delivery target for the period 2001 to 2021 of 4,600 dwellings as set out in the East of England Plan, with the annual average requirement of 250 dwellings per annum to extend provision from 2021 to 2025. It also confirms that the residual target for the period 2006 to 2021 is 3,790 dwellings, taking account of the delivery of 810 dwellings in the period 2001 to 2006, and a further 618 dwellings have been completed between 2006 and 2008.

This leaves a residual housing provision target of a minimum of 3,172 dwellings in the period 2008 to 2021. Taking into account the required provision beyond 2021, the residual housing provision target in the period 2008 to 2025 is a minimum of 4,172 dwellings. The disparity between these figures and those provided within the CSS are explained by the rounding down of the annual average delivery requirement in the period 2006 to 2021 to 250 dwellings per annum, compared with the actual figure of 252.67.

The table at Paragraph 4.6 of the CSS identifies the source of housing provision that will meet the identified minimum requirements and includes figures for 'Extant Planning Permissions' and 'Existing allocations/other appropriate sites identified in Strategic Housing Land Availability Assessment'. These figures, along with the actual completions within the period are combined to produce the figure for the 'Total without Green Belt release' figure.

Setting aside the concern regarding under-provision associated with the rounding down of the annual average delivery requirement in the period 2006 to 2021, the CSS fails to identify the sites that will contribute to the 'Extant Planning Permissions' provision. The identification of the sites that will contribute to the 'Extant Planning Permissions' should be provided in the context of the findings of the Inspector in the appeal by Asprey Homes [APP/G5180/A/07/2043219/NWF] who determined that the reliance on a delivery rate of 100% is unsafe [IR287].

Furthermore, at the time of writing these representations, the Strategic Housing Land Availability Assessment 2009 has not been published. It is impossible therefore for a full assessment of the proposed housing provision to be undertaken to confirm whether the CSS is 'founded on a robust and credible evidence base' [test of soundness in the table following Paragraph 4.52 of PPS12].

iii. Redevelopment of Employment Sites

Paragraph 4.14 of the CSS refers to the identification of the four employment sites that are considered by the Council to be suitable for redevelopment to residential use. However, the failure to publish the Strategic Housing Land Availability Assessment 2009 either before or alongside the publication of the CSS means that the assumptions made by the Council as to the suitability, availability, viability and deliverability of the sites cannot be assessed.

It has been necessary, therefore, to review the assumptions made in the Rochford Urban Capacity Study 2007 (UCS) regarding the sites. Within the section of the UCS entitled 'Redevelopment of Established Employment Land' [pages 22 & 23] includes a list of those sites assessed, their indicative capacities and the probability of residential development coming forward at the sites within the plan period (identified elsewhere as 2001 - 2021). The list includes the four sites identified in the CSS of Eldon Way/Foundry Estate, Hockley; Rawreth Lane Industrial Estate, Rayleigh; Stambridge Mills; and Star Lane Industrial Estate, Great Wakering.

In total, the UCS identifies an indicative residential redevelopment capacity of 486 units on the four sites (118, 220, 60 and 88 respectively). Of these, it identifies the Rawreth Lane Industrial Estate and Stambridge Mills as having a 'high'

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probability of coming forward for development in the Plan period (2001 - 2021), which would deliver 280 residential dwellings using the Council's own figures. The Star Lane Industrial Estate (referred to in the UCS as the Star Lane Brickworks) is identified as having a 'medium' probability of coming forward for development in the Plan period, with capacity to deliver 88 residential dwellings. It is unclear, therefore, where the figure for 'Existing allocations/other appropriate sites identified in Strategic Housing Land Availability Assessment'.

Set against this is the identification of these four sites in the CSS as being capable of delivery for residential development within the Plan period, with 671 units delivered between 2006 and 2015 and a further 506 units between 2015 and 2021.

The UCS also states in the same section that:

"There are considerable areas of land in the district that are currently allocated for, and in use as, employment land. The redevelopment of such sites for residential use would reduce demand for residential development on greenfield sites, but would at the same time create a need for alternative sites to be found for employment. Such an approach, which would be likely to require the decontamination of existing employment land to make it fit for residential use, together with development of a greenfield site and implementation of additional infrastructure to serve the new employment area, may well be unsustainable." [our emphasis]

The UCS appears to confirm therefore, that not only would the redevelopment of the four sites listed in the CSS be unlikely within the Plan period, but also potentially unsustainable. In this regard, it is notable that the promoters of Stambridge Mills sought the Screening Opinion of the Council as to whether Environmental Impact Assessment of the planning application for the redevelopment of the site for residential use was required in 2007, but to date are yet to submit a planning application for the redevelopment of the site.

In light of this, Colonnade does not consider the CSS is 'the most appropriate strategy when considered against the reasonable alternatives' [test of soundness in the table following Paragraph 4.52 of PPS12], which include the provision of residential development in East Rochford.

iv. Strategic Housing Growth to the East of Rochford

Furthermore, whilst paragraph 2.62 of the CSS identifies concern relating to the identification of locations to the east of Rochford for development on the basis that 'vehicular movements would inevitably be directed through Rochford's historic core', the CSS later identifies Stambridge Mills as a suitable site for residential redevelopment.

In light of the evident conflicts between the evidence base provided in support of the CSS and the absence of other evidence, the CSS is not considered 'sound' in the context of the tests of soundness in the table following Paragraph 4.52 of PPS12.

v. Housing Trajectory

Paragraph 4.28 of the CSS confirms that policies H1, H2 and H3 of the CSS will deliver housing supply as illustrated in the Housing Trajectory at Appendix H2. This Housing Trajectory is transposed from the 2008 Annual Monitoring Report (AMR).

Whilst on the face of it, the Housing Trajectory appears to confirm that the Council can meet its requirement to identify a five year housing supply, many of the sites identified within the AMR do not conform to the guidance issued by CLG in August 2008, on the assessment of a five year land supply. The guidance identifies sites that can be included within the five year assessment of housing supply as:

"those that are allocated for housing in the Development Plan, sites that have planning permission (outline or full planning permission that has not been implemented) and specific, unallocated brownfield sites that have the potential to make a significant contribution to housing delivery during the 5 year period".

Table 4.10: Projected Net Completions of the AMR confirms that the five year housing land supply figure includes sites from 'other land allocated for residential purposes', which are based on land allocations outside existing settlements. However, it should be clarified that these land allocations are not currently allocated for housing development in an adopted Development Plan. As such, these unallocated greenfield sites that are yet to make significant progress through the planning system should be discounted and the five year housing land supply recalculated.

The table below has been prepared to confirm the extent of the shortfall should the sites from 'other land allocated for residential purposes' be removed from the calculation of the Rochford five year housing land supply, in accordance with the guidance issued by CLG:

Recalculated Five Year Housing Land Supply (2009 - 2014):

Year
1st April 2009 to 31st March 2010
Predicted Delivery (A)

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106 dwellings
Allocations on 'other land allocated for residential purposes' (B)
0
Residual delivery (A-B)
106 dwellings
Delivery Shortfall
0

Year
1st April 2010 to 31st March 2011
Predicted Delivery (A)
217 dwellings
Allocations on 'other land allocated for residential purposes' (B)
150
Residual delivery (A-B)
67 dwellings
Delivery Shortfall
150

Year
1st April 2011 to 31st March 2012
Predicted Delivery (A)
544 dwellings
Allocations on 'other land allocated for residential purposes' (B)
300
Residual delivery (A-B)
244 dwellings
Delivery Shortfall
300

Year
1st April 2012 to 31st March 2013
Predicted Delivery (A)
395 dwellings
Allocations on 'other land allocated for residential purposes' (B)
375
Residual delivery (A-B)
20 dwellings
Delivery Shortfall
375

Year
1st April 2013 to 31st March 2014
Predicted Delivery (A)
300 dwellings
Allocations on 'other land allocated for residential purposes' (B)
300
Residual delivery (A-B)
0 dwellings
Delivery Shortfall
300

TOTAL

Predicted Delivery (A)
1,562 dwellings

Allocations on 'other land allocated for residential purposes' (B)
1,125 dwellings

Residual delivery (A-B)
437 dwellings

Delivery Shortfall
1,125 dwellings

The above table confirms that the removal of the 'other land allocated for residential purposes' from the calculation of the Rochford five year housing land supply leaves the Council with a minimum net additional housing delivery of 437 dwellings, which equates to a supply of 1.7 years based on the adjusted annual delivery target of a minimum of 255 net

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additional dwellings per annum. As such, the Council is failing to meet its requirement to demonstrate a five year housing land supply in accordance with PPS3 and the supporting guidance provided by CLG. It is notable that the recent application by David Wilson Homes at Land between Main Road and Rectory Road and Clements Hall Way, Hawkwell identifies an even greater shortfall in the Council's five year housing land supply.

In addition to the above, the AMR does not include a commentary on how deliverability has been assessed against the requirements of paragraph 54 of PPS3.

Furthermore, the guidance from CLG confirms that the windfall sites cannot be relied upon in demonstrating a five year supply unless a Local Planning Authority can demonstrate genuine local circumstances exist to allow this exception. However, the second paragraph of the section entitled 'Housing Trajectory and Five Year Housing Supply' confirms that the estimated completions in the years 2008 to 2013 includes estimated yields through 'intensification' coming forward in future years. With reference to the definition of 'intensification' on page 13 of the AMR, it appears that the 'Housing Trajectory and Five Year Housing Supply' also includes provision for windfall sites. As such, the Council is required to demonstrate the 'genuine local circumstances exist to allow this exception'.

The pressures on delivery and need for additional sites are more acute when it is considered that an average delivery rate of 204 dwellings per annum was achieved during a strong period of housing market growth. In view of the current economic downturn, and significant problems faced within the housing market, the Council should seek to identify appropriate and deliverable sites to meet its regional housing target provision commitments. Suitable sites would include Coombes Farm, which has been positively promoted for development through the LDF process.

It may, therefore, be more appropriate for the Council not merely to allocate sufficient sites to meet the minimum targets set down by the East of England Plan, but to identify a reservoir of land capable of coming forward for development should the sites identified through the CSS and Allocations Development Plan Documents (DPD) fail to come forward for development within the anticipated timescales.

vi. Appendix H1

As set out in the representations to the Preferred Options Core Strategy, there is continuing concern that the list of improvements to infrastructure required in support of residential development as set out in Appendix H1 fails to provide the necessary justification for its inclusion. Whilst the preamble seeks to clarify why the infrastructure is sought, the inclusion of this list should be fully justified, otherwise it is of little value. Furthermore, it would be of benefit to provide further details of the existing community infrastructure provision and capacity within the evidence base.

The failure to provide the necessary justification for its inclusion means that the CSS will not be 'founded on a robust and credible evidence base' [test of soundness in the table following Paragraph 4.52 of PPS12].

d) Character of Place

As set out in the representations to the Preferred Options Core Strategy, Colonnade considers that, with respect to the requirement to produce and adhere to Development Briefs for large residential developments, as set out in Policy CP1, the Council should not seek to impose further demands on developers where existing regulations provide sufficient requirements regarding design. In this instance, Design and Access Statements provide sufficient design guidelines for developments and there is no additional information provided in the policy or supporting text that clearly sets out the justification for this requirement.

e) Green Belt

With reference to the comments regarding the redevelopment of employment sites under the 'Housing' section above and the requirement to allocate sufficient land to meet the minimum housing provision targets as required by the East of England Plan, Colonnade considers that the chapter on Green Belt, and policy GB1 in particular, fails to provide the necessary evidence base that will allow it to be monitored effectively.

It is inherent that the proposed redevelopment of previously developed employment sites for residential use in order to reduce the requirement to allocate previously undeveloped land for residential use will displace these employment uses. In turn, therefore, the separate allocation of previously undeveloped Green Belt to accommodate the compensatory employment provision is required. This is accepted in principle at paragraph 11.11 of the CSS.

Without providing clarification of the anticipated quantum of land required to accommodate the provision of housing and compensatory and new employment land, it is not possible to monitor the performance of policy GB1.

However, using the Council's figures in the table setting out the breakdown of the housing provision figures in Chapter 4 of the CSS (assuming that actual completions and extant permissions are all on previously developed land), setting aside the displacement of employment uses referred to above, approximately 42% of the required minimum housing provision target is capable of being accommodated on previously developed land (2,005 units from a total of 4,750). As such, the Council is required to provide at least 58% of the required minimum housing provision target on the Green Belt (2,745 units from a total of 4,750).

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If these figures are adjusted to take account of the displacement of employment uses (assuming the provision of an equal quantity of land is required to compensate for the employment land that is redeveloped), this figure changes to 17.5% on previously developed land and 82.5% on Green Belt (828 and 3,922 units from a total of 4,750 respectively). Even allowing for the achievement of higher densities of employment on new developments, the figures above are unlikely to change significantly.

Furthermore, the table in Chapter 4 also confirms that no previously developed land will be available for development beyond 2021, or 2015 if account is taken of the displacement of the employment uses.

In light of this, not only does Chapter 6 fail to provide the necessary evidence base that will allow it to be monitored effectively, it is also necessary to consider whether it presents the most appropriate strategy for addressing the required release of Green Belt land to accommodate the defined housing and employment delivery targets to 2025 and beyond as necessary. Colonnade considers a more robust approach that is flexible and capable of being monitored, would be to clearly identify those sites capable of delivery in the short term, which for the avoidance of doubt includes those sites being promoted by Colonnade, with a reservoir of alternative sites set aside for future growth.

As set out in the representations to the Preferred Options Core Strategy, Colonnade considers that the inclusion of an affordable housing exception policy within the CSS will aid the delivery of community housing within rural areas. However, the CSS does not contain such a policy, or adequately address the issue of community housing within rural areas and the CSS is not considered to provide sufficient flexibility to allow for the delivery of essential rural housing.

f) Environmental Issues

Colonnade has concerns regarding the justification for and effectiveness of a number of the policies contained within the Environmental Issues chapter, as follows:

â€¢ Policy ENV1: The Council fails to identify how it will "maintain, restore and enhance" the sites of nature conservation importance that are identified, or how the performance of this policy will be monitored;

â€¢ Policy ENV3: In the context of the advice at paragraph 4.32 of PPS12 regarding the reformulation of national policies, Colonnade does not consider that this policy is required; and

â€¢ Policy ENV9: As set out in the representations to the Preferred Options Core Strategy, Colonnade does not consider that the necessary evidence base has been provided to justify a policy that seeks to go above and beyond the policy targets for the Code for Sustainable Homes as set out by Central Government.

g) Community Infrastructure, Leisure and Tourism

Policy CLT1 refers to the requirement for residential and employment development to contribute to the infrastructure identified in Appendix CLT1 through Standard Charges.

However, whilst the general principle of securing planning obligations through the application of standard charges is broadly accepted, the list of infrastructure requirements set out in Appendix CLT1 is not supported by sufficient evidence base to identify its robustness and credibility. As such, Colonnade does not consider either policy CLT1 or Appendix CLT1 is justified in the context of PPS12.

It is also noted that, despite the clarification sought by Colonnade at the Core Strategy Preferred Options stage, the CSS fails to confirm what information should be contained within Health Impact Assessments, which are required by policy CLT4. Once again, Colonnade requests further clarification of what is involved in the assessment and the expected outputs, which will provide greater clarity and will allow the policy to be monitored.

h) Transport

Policy T8 confirms that the Council will apply minimum parking standards. As set out in the representations to the Preferred Options Core Strategy, the guidance in Planning Policy Guidance Note 13: Transport (PPG13) is clear regarding the imposition of parking standards.

Paragraphs 52-56 of PPG13 confirm that the Local Planning Authorities should apply maximum not minimum parking standards. In order to satisfy the legal requirements set out in PPS12, the policy must reflect PPG13 to promote sustainable transport choices and further provide incentives for developers to locate further residential land closer to local service centres by requiring maximum parking standards for residential developments.

i) Economic Development

As set out in the representations to the Preferred Options Core Strategy, the land at Three Ashes Farm provides an excellent opportunity to deliver employment growth in the short term and may be a suitable site for the 'Eco-Innovation Centre' that is being promoted by the Council. Its identification as a suitable location for strategic employment growth, or the provision of an Eco-Innovation Centre, would accord with the general principles of the policies contained within Chapter 11.

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The identification of Purdeys Industrial Estate as fit for purpose (in paragraph 11.32 and the Council's 2008 Employment Land Study 2008) and therefore it should be maintained and if possible expanded, is welcomed and Colonnade considers that Three Ashes Farm could deliver this expansion, providing a natural extension to Purdeys Industrial Estate and being strategically located close to the Airport.

Three Ashes would address the negative impacts that the nearby residential area experiences from the existing Industrial Estate by providing a buffer between established uses and the residential area with less intensive employment activities. The highways analysis that has been carried out has suggested that it would not have an adverse impact on roads and congestion. Furthermore, there are very few opportunities for businesses to expand and Three Ashes could provide this opportunity.

j) Conclusions

Following the submission of representations to the Preferred Options Core Strategy, Colonnade is disappointed to note that the CSS fails to take account of the majority of the issues raised in their representations.

In addition, Colonnade considers the plan to be 'unsound' as the document consistently fails to meet the tests of soundness set out in the table following Paragraph 4.52 of PPS12 and respectfully requests that the Council notifies Icen, on behalf of Colonnade, of the future arrangements for the Examination of the Core Strategy. Furthermore, Colonnade wishes to take this opportunity to formally register a request to appear at all stages of the Examination in Public, including the pre-hearing meeting and any planned hearing sessions whereby issues raised in the context of this letter are to be discussed. Please confirm this request, and that the representations made to the Preferred Options Core Strategy will be taken into account alongside the current representations, by way of return to this letter.

Icen Projects, on behalf of Colonnade Land LLP trusts that the Council will find these representations to be constructive and helpful in taking forward the Core Strategy. Should you wish to discuss any aspect of these representations further, please do not hesitate to contact us.

Summary:

d) Character of Place

As set out in the representations to the Preferred Options Core Strategy, Colonnade considers that, with respect to the requirement to produce and adhere to Development Briefs for large residential developments, as set out in Policy CP1, the Council should not seek to impose further demands on developers where existing regulations provide sufficient requirements regarding design. In this instance, Design and Access Statements provide sufficient design guidelines for developments and there is no additional information provided in the policy or supporting text that clearly sets out the justification for this requirement.

Change to Plan

Appear at exam? Yes

Soundness Tests i

Core Strategy Submission Document

S - 16373 - 8267 - Policy CP1 - Design - None

16373 Support

CHAPTER 5 Policy CP1 - Design

Respondent: Aber Ltd [8267]

Aber Ltd
C/o Agent

Agent: Colliers CRE (Mr S Chapman) [8266]

Colliers CRE
9 Marylebone Lane
London
W1U 1HL
020 7344 6533

Full Text: New developments should promote good, high quality design, which should have a good relationship with its surroundings.

Summary: New developments should promote good, high quality design, which should have a good relationship with its surroundings.

Change to Plan N/A

Appear at exam? No

Soundness Tests N/A

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S - 16840 - 7704 - Policy CP1 - Design - iii

16840 Support

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Respondent: English Heritage (Ms K Fletcher) [7704]

Agent: N/A

English Heritage
Brooklands
24 Brooklands Avenue
Cambridge
CB2 2BU

Full Text: ROCHFORD LOCAL DEVELOPMENT FRAMEWORK
CORE STRATEGY SUBMISSION DOCUMENT

Thank you for your letter dated 21 September 2009 consulting English Heritage on the above document. Our comments are set out below.

CHAPTER 4 HOUSING

Vision and objectives

While we note that character of place is addressed in chapter 5, it is important that this consideration is recognised as relevant within the Housing chapter. Paras 2.33, 2.69 and 2.73 also recognise the importance of character and sense of place in the built environment. We recommend that this consideration should be integrated into the vision and objectives for housing in order to improve the clarity of the plan, and its consistency with advice in PPS1.

Recommendation:

The following amendments are suggested:

- Vision in five years: add 'settlement character' after 'infrastructure'
- Vision by 2025: add 'and places' after 'communities' in bullet 1
- Objectives: In objective 2 amend to '...sustainable locations, enhancing sense of place and having regard to..'
- Para 4.19: Amend bullet 5 to read 'The historical, agricultural and ecological value of land, and settlement character'

CHAPTER 5 CHARACTER OF PLACE

We strongly support this section and policies CP1, CP2 and CP3. In the absence of policy coverage for listed buildings and scheduled monuments we recommend that para 5.9 should refer to PPGs 15 and 16, as well as draft PPS15.

CHAPTER 8 ENVIRONMENTAL ISSUES

We welcome the references the historic environment in the objectives and in policies ENV1 and ENV2.

Policy ENV6 Large Scale Renewable Energy Projects

We consider that this policy should refer to the historic interest of sites to reflect the advice in PPS22 more appropriately.

Recommendation: amend the first bullet in policy ENV6 to read '...it's ecological, historic or landscape value...'

CHAPTER 11 ECONOMIC DEVELOPMENT

Policy ED2 London Southend Airport

We understand that the grade I listed church in the vicinity of the runway will be protected in any proposals for expansion of the airport and the Core Strategy policy does not suggest otherwise. We will respond to the detail of proposals for the airport through responses to consultations on the Joint Area Action Plan and any planning applications.

In the interests of clarity, the above comments where we suggest changes to the Core Strategy should be recorded as objections to the soundness of the plan in terms of consistency with national guidance. However, we hope that it will be possible to agree amendments on these points prior to the public examination.

We would be happy to discuss any of these comments if you would find this useful.

Summary: CHAPTER 5 CHARACTER OF PLACE

We strongly support this section and policies CP1, CP2 and CP3.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16879 - 8329 - Policy CP1 - Design - None

16879 Support

CHAPTER 5 Policy CP1 - Design

Respondent: Swan Hill Homes Limited [8329]

Swan Hill Homes Limited
C/O Agent
Mr P Kneen
Charles Planning

Agent: Charles Planning Associates Ltd (Mr P Kneen) [5040]

Charles Planning Associates Ltd
1644-1645 Parkway
Solent Business Park
Whiteley
Fareham
Hampshire
PO15 7AH
01489 580853

Full Text:

1.0 Instruction and Introduction

1.1 Charles Planning Associates Limited (Chartered Town Planners) is Instructed by Swan Hill Homes Limited (Swan Hill) to prepare and submit representations on their behalf in respect of the Rochford District Local Development Framework: Core Strategy Submission (September 2009) Development Plan Document.

1.2 The comments refer to the relevant sections and policy designations in the Submission document, as appropriate.

1.3 The comments set out in this submission are intended to assist the District Council in taking forward its Local Development Framework. It is our intention to continue to be involved in the LDF preparation process and we look forward to the opportunity to comment further at the Examination to the Core Strategy.

1.4 If you have any queries regarding the content of this submission then please do not hesitate to contact:

Peter Kneen BSc (Hons) MSc MRTPI
Planner

2.0 Housing:

Policy H1 - The Efficient Use of Land for Housing

2.1 Swan Hill recognises the importance of seeking to concentrate new developments mainly in the existing urban areas, on previously developed land where possible, particularly in view of the Government seeking to ensure 60% of all such new developments are on previously development land (PDL).

2.2 However, given the character of the District, and the strategic housing requirement of the East of England Plan, Swan Hill supports the approach that the Council must also make provision for additional development on the edge of existing settlements on greenfield sites, particularly in the most sustainable locations. As such, Swan Hill supports that where feasible, the redevelopment of existing employment sites for residential/employment purposes can make a contribution towards the strategic housing requirement, provided that sufficient additional employment land is brought forward to ensure the stability of employment levels in the District, and to ensure employment growth meets the East of England Plan requirements.

2.3 Swan Hill considers that Policy H1 should include consideration that new extensions to existing settlements have regard to their potential impact on the wider characteristics and openness objectives of the Green Belt.

Policy H2 - Extensions to Residential Envelopes and Phasing

2.4 Swan Hill generally supports the approach taken by the Council in this policy. As set out above, Swan Hill consider the Council's acknowledgment that housing requirements should be met through the allocation of land on the edge of the existing settlements is the most suitable way forward to meeting the Council's strategic housing requirement and complies with the advice in PPS3.

2.5 The need for suitable greenfield urban extensions represents the best way forward for the Council to meet its strategic housing requirement, as set out in the East of England Plan. Swan Hill supports the recognition that the potential supply of alternative previously developed sites is limited, without detrimentally affecting the character of the District, and therefore the best way forward is the use of sustainable greenfield urban extensions to the existing settlements of the District.

2.6 However, Swan Hill consider that a fundamental consideration that the District Council should consider relates to the potential impact of the urban extensions on the Green Belt policy has been somewhat overlooked. The wider sustainability credentials of the settlements of the District should only be one of many key considerations for determining the level of expansion. In view of the proximity of Southend-on-Sea to all the main settlements of the District, and the influence this has on the likely location many people would travel for employment and leisure, sustainability of many of the settlements is not a key overarching factor, and greater weight should be placed on the potential impact on the openness of the Green Belt, as this cannot be remedied if development occurs in the wrong location.

2.7 As such, Swan Hill considers that determining the location of growth for the main settlements should be to identify

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those locations where the impact on the wider setting of the Green Belt can be minimised. Further justification for those general locations chosen should be identified in Policy H2. In this regard, Swan Hill has serious concerns regarding the removal of Land South West of Great Wakering as a viable option for the growth of the settlement. The development of this area of Great Wakering, in addition to the potential redevelopment of the Star Lane Industrial Estate could provide a more comprehensive development, whilst ensuring that the wider openness of the Green Belt is maintained. Land South West of Great Wakering is significantly better placed to limit the impact on the wider Green Belt than Land West of Great Wakering, and could contribute to the provision of an important amenity and wildlife site for the local community.

2.8 In addition, Swan Hill consider that the Council now has no reserve provision in the event that any of the existing employment sites set out in Policy H1 fail to come forward for development within the envisaged timescale. Further, Land West of Great Wakering has not been identified in the SHLAA as a deliverable site to help meet the strategic housing requirement, contrary to the requirement set out in PPS3.

2.9 As such, Swan Hill would support the provision of suitable sites which could be safeguarded for future development in the likelihood of a shortfall in supply.

Policy H3 - Extensions to Residential Envelopes Post 2021

2.10 As set out above, Swan Hill supports the overall approach the Council has taken towards the provision of sustainable urban extensions as a suitable means of meeting their strategic housing requirement. However, as set out for Policy H2 above, Swan Hill has serious concerns regarding the removal of several proposed sites set out in the October 2008 Preferred Options Core Strategy, without any guarantee of the ability to deliver those sites set out in Policy H1.

2.11 As also considered above, the inclusion of West of Great Wakering for 250 dwellings should not be included ahead of South West of Great Wakering, in view of the fact that the site is not identified in the SHLAA as available, suitable and achievable as required by PPS3, and thus is not supported by a robust and creditable evidence base for its inclusion as a strategic site for development.

2.12 Whilst Swan Hill acknowledge that alterations to Policy H1 has resulted in the removal of some locations for growth in Policy H3 (as set out in the Sustainability Appraisal), Swan Hill does not consider that the most appropriate locations have been chosen.

2.13 In addition to the matters raised above, the use of West of Great Wakering would also result in the loss of valuable agricultural land, which clearly in a Green Belt location, should be less suitable for development than other sites, such as South West of Great Wakering, which would have limited impact on the wider Green Belt policy, and not result in the loss of valuable agricultural land.

2.14 Finally, in respect of Policies H1, H2 and H3, all of the above comments are based on our interpretation of the Submission Version Core Strategy when compared to the October 2008 Version of the Core Strategy. Without the ability to undertake a detailed assessment of the Council's SHLAA, it is not possible to clarify the proposed Core Strategy position regarding the proposed direction of growth proposed for the settlements in the District. As such, Swan Hill reserves the right to make additional representations regarding the proposed Policies H1, H2 and H3 following the publication of the SHLAA in due course.

Policy H4 - Affordable Housing

2.15 In general terms, Swan Hill supports the approach taken by the Council towards the provision of affordable housing for new residential developments. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H5 - Dwelling Types

2.16 Swan Hill supports the policy provision of H5, and considers that the approach taken by the Council for this policy represents a suitably flexible alternative to stipulating percentages of dwelling mix, sought by some local authorities. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H6 - Lifetime Homes

2.17 In regard to this policy, Swan Hill objects to the Council's policy where all new dwellings should be provided to the Lifetime Homes Standard. Whilst it is acknowledged that the UK has an aging population, Swan Hill considers that seeking to provide Lifetime Homes on all sites is considered to be overly onerous for proposed developers, particularly when considering the requirement for all car parking spaces to be suitable for disabled users, which could result in more schemes becoming unviable. Therefore, the provision of a percentage of Lifetime Homes should be considered through negotiations with the Council at the planning application stage, and should be determined on a case-by-case basis.

3.0 Character of Place: Policy CP1 - Design

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3.1 The Town and Country Planning (General Development Procedure) Order 1995 (As Amended) makes the submission of a Design and Access Statement for most types of planning applications a Statutory requirement, and as such, the provision of a Design Brief represents a pre-requisite of all major planning applications.

3.2 Policy CP1 seeks to ensure the provision of good, high quality developments that reflect local characteristics and distinctiveness, this ideology is supported by Swan Hill.

4.0 The Green Belt:
Policy GB1 - Green Belt Protection

4.1 Following the amendments to the wording of the Policy since the October 2008 Preferred Options Core Strategy, Swan Hill is now generally supportive of Policy GB1 and its supporting text. However, as expressed above, it is important that where alterations to the Green Belt boundary occur as a result of the extension of the settlements to meet the strategic housing requirement, both the minimal amount of land is taken and where that land is taken for development, it represents the best available land which has a minimal impact of the wider openness characteristic of the Green Belt.

5.0 Environmental Issues:
Policy ENV3 - Flood Risk

5.1 Swan Hill generally supports the approach set out in Policy ENV3 regarding ensuring development accords with the sequential test of PPS25. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV4 - Sustainable Drainage Systems (SUDS)

5.2 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV4. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV8 - On-site Renewable and Low Carbon Energy Generation

5.3 Whilst Swan Hill recognises the importance of reducing carbon emissions, particularly in new housing developments, and the role this can play in reducing the nations overall Greenhouse emissions. As such Swan Hill is generally supportive of Policy ENV8. It is noted that Policy ENG1 of the East of England Plan sets out a threshold of developments comprising 10 or more dwellings. Swan Hill consider it important for the District Council to justify the reduction in the threshold level.

5.4 Further, no assessment of Policy ENV8 has been set out in the Sustainability Appraisal which justifies the change in threshold from that of Policy ENG1 of the RSS.

Policy ENV9 - Code for Sustainable Homes

5.5 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV9. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

6.0 Community Infrastructure, Leisure and Tourism:
Policy CLT1 - Planning Obligations and Standard Charges

6.1 Swan Hill generally supports the overall approach the Council has taken in Policy CLT1. It is considered Policy CLT1 sets out a degree of flexibility to ensure that all sites are considered on a site-by-site basis, assessing the individual merits of each planning application, in order to ensure the levels of contributions applicable meet the five tests of Circular 05/05. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policies CLT5 - Open Space;
CLT7 - Play Space;
CLT8 - Youth Facilities; and,
CLT10 - Playing Pitches

6.2 Swan Hill supports the need for new residential developments to incorporate a degree of new publicly accessible open space, children's play space, youth facilities and playing pitches, and as such, generally supports the policy approaches taken by the Council.

6.3 However, it is important that whilst the Council may seek to undertake an assessment of providing standard charges for new development, which, as set out in Policy CLT1, this should be based on thorough public consultation and consideration and sound justification. Swan Hill consider that within the provision of a standard charge, it is important that such provision allows for a degree of flexibility to ensure that each site is assessed individually and on its own merits. This is particularly important for those sites close to existing open spaces and facilities. As such, the levels of

16879 Support

CHAPTER 5 Policy CP1 - Design

open space and recreation facilities required in the 'standard charge' should be based on an up-to-date PPG17 Open Space assessment, which should be used to form a key consideration in the levels of provision likely to be required in the standard charge system proposed.

7.0 Transport: Policy T1 - Highways

7.1 Swan Hill supports the overall objectives set out in Policy T1 requiring developments to be located and designed to reduce the reliance on the private car and to meet the infrastructure needs generated by development or seek to help achieve these needs is acceptable in principle.

7.2 Swan Hill recognises the importance of providing sufficient infrastructure provision to meet the requirements of development, and that where developments have insufficient consideration of impact on existing infrastructure, they should be considered unacceptable and contrary to National policy guidance. However, Swan Hill considers it important to emphasise that the developer's role should not be seen as a means to meet existing shortfalls in provision.

Policy T3 - Public Transport

7.3 Swan Hill is generally supportive of the policy approach set out in T3, however, as set out in paragraph 7.2 above, it is important that the District Council do not consider that it is the developer's responsibility to resolve existing shortfalls in provision of public transport, and any contribution towards additional public transportation provision should only be to mitigate against the additional level of demand likely from the development proposed.

Policy T5 - Cycling and Walking

7.4 Swan Hill supports the general approach to this policy, as Swan Hill recognises the importance of promoting the use of alternatives to the private car. The policy provision acknowledges the need to ensure relevant contributions in the event of additional travel demands generated by individual developments, whilst also setting out additional aspirations for the cycle network in the District.

7.5 As such, Swan Hill considers this policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy T8 - Parking Standards

7.6 The Council has recently (January 2007) adopted SPD on the requirements for parking standards, and as such, Swan Hill generally supports the policy approach chosen by the Council. As set out in the SPD, whilst Swan Hill generally supports the approach taken by the District Council towards setting residential parking standards, in that the Council has recognised that in the suburban areas, even with some access to public transport, the majority of residents will rely on the use of private cars. However, Swan Hill has concerns over the failure of the District Council to comply with the provisions of PPG13: Transport (2001) which sets out that Local Planning Authorities should not set minimum standards for car parking. Whilst it is acknowledged that PPS3 sets out provision for the consideration of local circumstances, it is considered that the Council has not justified this deviation from PPG13's maximum standard.

7.7 Whilst it is acknowledged that such justification may become apparent through the work currently being undertaken by Essex County Council, until such time, the District Council should only seek to apply the maximum standards indicated in PPG13. However, Swan Hill recommends that the District Council make provisions in the wording of the Policy to allow for changes in the event that future policy on car parking standards need to reflect the County standard, following the completion of the County Council review.

8.0 Economic Development: Policies ED3 - Existing Employment Land ED4 - Future Employment Allocations

8.1 In respect of Policies ED3 and ED4, Swan Hill notes that they have changed considerably since the October 2008 Preferred Options document, in that they are site specific regarding the location of the proposed redevelopment of existing employment sites. These four sites are also identified in Policy H1 - Efficient Use of Land, and in general, Swan Hill supports the approach to the redevelopment of these sites (where feasible) based on the assessments of the sites set out in this version of the Core Strategy.

8.2 However, Swan Hill has concerns that these policies might not be considered suitably sound given that insufficient opportunity has been allocated for consultation on their redevelopment. Without the SHLAA being publically available prior to the consultation on this Core Strategy, an insufficient evidence base has been provided to corroborate that these sites are neither suitable or deliverable to meet the test of soundness requirements.

Summary: Policy CP1 - Design

3.1 The Town and Country Planning (General Development Procedure) Order 1995 (As Amended) makes the submission of a Design and Access Statement for most types of planning applications a Statutory requirement, and as

Core Strategy Submission Document

S - 16879 - 8329 - Policy CP1 - Design - None

16879 Support

CHAPTER 5 Policy CP1 - Design

such, the provision of a Design Brief represents a pre-requisite of all major planning applications.

3.2 Policy CP1 seeks to ensure the provision of good, high quality developments that reflect local characteristics and distinctiveness, this ideology is supported by Swan Hill.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16841 - 7704 - Policy CP2 - Conservation Areas - None

16841 Support

CHAPTER 5 Policy CP2 - Conservation Areas

Respondent: English Heritage (Ms K Fletcher) [7704]

Agent: N/A

English Heritage
Brooklands
24 Brooklands Avenue
Cambridge
CB2 2BU

Full Text: ROCHFORD LOCAL DEVELOPMENT FRAMEWORK
CORE STRATEGY SUBMISSION DOCUMENT

Thank you for your letter dated 21 September 2009 consulting English Heritage on the above document. Our comments are set out below.

CHAPTER 4 HOUSING

Vision and objectives

While we note that character of place is addressed in chapter 5, it is important that this consideration is recognised as relevant within the Housing chapter. Paras 2.33, 2.69 and 2.73 also recognise the importance of character and sense of place in the built environment. We recommend that this consideration should be integrated into the vision and objectives for housing in order to improve the clarity of the plan, and its consistency with advice in PPS1.

Recommendation:

The following amendments are suggested:

- Vision in five years: add 'settlement character' after 'infrastructure'
- Vision by 2025: add 'and places' after 'communities' in bullet 1
- Objectives: In objective 2 amend to '...sustainable locations, enhancing sense of place and having regard to..'
- Para 4.19: Amend bullet 5 to read 'The historical, agricultural and ecological value of land, and settlement character'

CHAPTER 5 CHARACTER OF PLACE

We strongly support this section and policies CP1, CP2 and CP3. In the absence of policy coverage for listed buildings and scheduled monuments we recommend that para 5.9 should refer to PPGs 15 and 16, as well as draft PPS15.

CHAPTER 8 ENVIRONMENTAL ISSUES

We welcome the references the historic environment in the objectives and in policies ENV1 and ENV2.

Policy ENV6 Large Scale Renewable Energy Projects

We consider that this policy should refer to the historic interest of sites to reflect the advice in PPS22 more appropriately.

Recommendation: amend the first bullet in policy ENV6 to read '...it's ecological, historic or landscape value...'

CHAPTER 11 ECONOMIC DEVELOPMENT

Policy ED2 London Southend Airport

We understand that the grade I listed church in the vicinity of the runway will be protected in any proposals for expansion of the airport and the Core Strategy policy does not suggest otherwise. We will respond to the detail of proposals for the airport through responses to consultations on the Joint Area Action Plan and any planning applications.

In the interests of clarity, the above comments where we suggest changes to the Core Strategy should be recorded as objections to the soundness of the plan in terms of consistency with national guidance. However, we hope that it will be possible to agree amendments on these points prior to the public examination.

We would be happy to discuss any of these comments if you would find this useful.

Summary: CHAPTER 5 CHARACTER OF PLACE

We strongly support this section and policies CP1, CP2 and CP3.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16724 - 7834 - Local Lists, 5.17 - i

16724 Object

CHAPTER 5 Local Lists, 5.17

Respondent: Ms G Yeadell [7834]

6 Southend Road
Hockley
Essex
SS5 4QQ
01702 205450

Agent: N/A

Full Text: Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1

Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2 you discarded N.E.Hockley as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley..along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

Response to C.S Preferred Options 2008 and HAAP 2009

June 2009 issue C S Submission issue says Eldon Way will be used for housing, whereas Sept.2009 issue says "alternative uses, including residential.." to be decided by HAAP (Issues consultation done, Pref.Options issue awaited, but judging from JAAP Pref.Options decision - namely biggest option chosen against overriding opposition, it will be housing).

Need to be logical and even-handed in proposals

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

Establish likely level of Standard Charges. Accept you cannot turn district into motorways with wholesale demolition.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

Para.10.5 "..highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which cannot be altered without much destruction.

Reply to CS Pref. Options 2008 & HAAP Issues/Options 2009

Policy T3, CLT1 Appendix CLT1 Public transport RDC admits this is in the private sector. In Hockley, operator has cut No7 service to 1 per hour from Ashingdon Schools, claiming it is unviable beyond. This is unlikely to change as Hockley is car dependant. No8 bus through Hawkwell is cut to 1 per hour to Rayleigh, for same reason as No7. Proposed planning agreements with developers can't run: eg, a community centre or classroom given by a developer remains once he has moved on - how can that apply for an on-going bus service?

Reply to Infrastructure Transport in CS Pref. Opts. 2008 and to HAAP Issues Opts. 2009.

Ch.11 Economic development

Policy ED3 Core Strategy preferred Options 2008 hinted at possible housing in Eldon Way site. June 2009 Submission version, without consultation, said Eldon Way would be housing (map included Foundry, not the text). September 2009 Submission said redevelopment would be in HAAP (which apart from the Issues/Options version, is unfinished. Judging from results of JAAP Preferred Options where biggest option is chosen, though most respondents were against it, site will be housing, without consultation.

16724 Object

CHAPTER 5 Local Lists, 5.17

Para.1.25, Para.11.32 Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to accommodated employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

Reply to HAAP Issues Options 2009

Remove compulsory relocation

Policy ED4 Policy states Council will allocate 18ha of land to make up for de-allocations in ED3 - that proves point above.

Proposals for moving employment to out of town locations with no existing transport links are contrary to government policies PPG4, PPS1 and PPS4 and Core Strategy Policy T1.

Evidence Base is ignored by contravening Hockley Parish Plan 2007 and ignoring residents' views on HAAP Issues/Options. Next stage of HAAP Preferred Options is pre-empted and rendered irrelevant. Core Strategy plans to relocate Eldon Way Foundry estate to Greenfield site with no nearby bus or railway. RDC plans to upgrade the nearest road to dual carriageway, though the connecting B1013 (through Hockley) will stay single, said by ECC Highways statistics to be 72% capacity. Airport bosses and council cannot suggest there will be no traffic growth from JAAP and new industrial site.

Reply to Hockley Parish Plan 2007. HAAP Issues 2009

Move to new industrial site near airport contravenes PPS4:

- EC7.3C "out of centre sites, with preference given to sites...well served by choice of...transport and...close to centre and...high likelihood of forming links with centre". There is no current public transport and links with centres is unlikely".

- EC 7.5.1 "whether the site is or will be accessible and well served by choice of transport, public transport, walking and cycling, as well as by car...". Remote location, narrow busy B1013 makes the site unsuitable for access by cycle or on foot.

It also contravenes PPS1 (27vii)... "reduce need to travel, encourage accessible public transport provision to secure more sustainable patterns of transport...Planning should actively manage patterns of urban growth to make fullest use of public transport and focus development in existing centres, near to major public transport interchanges". Core Strategy undermines its own policy Transport and Highways policy T1 and is unsound.

Although shown on accompanying drawing in earlier versions, there was no prior textual mention of Foundry industrial estate (next to Eldon Way) for redevelopment until current CS 2009 Submission. This was stated to be a typing error, but does not inspire confidence in reliability of drafting.

Revise both 2009 Core Strategy and 2009 HAAP Issues/options

Chapter 12: Retail/Town centres

The Core Strategy misrepresents findings of the Retail and Leisure Study 2008.

Para.12.38 The Core Strategy states (para.12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace."

Whereas the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure".

2) (10.28) "There is no immediate capacity for additional floorspace".

3) (10.29) "we recommend focus be maintained on developing Hockley's existing strengths, rather than retail expansion"

4) 10.31 "the current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it has a very small catchment population. Accordingly, the council may wish to consider reclassifying Hockley from a town centre to a district centre".

Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

The Council will work with landowners and its partners to deliver the HAAP.

Remove threat of compulsory purchase orders.

Core Strategy Submission Document

O - 16724 - 7834 - Local Lists, 5.17 - i

16724 Object

CHAPTER 5 Local Lists, 5.17

One doesn't perceive impartiality when the Planning Director replies to local HAAP survey with "The affluent people of Hockley are entitled to famous name shops".

Chapter 5: Character of Place and Local Lists

Para.5.4 "Rochford district has unique character..stems from traditional buildings..still dominate towns and villages".

Para.5.17 "Council believes many buildings..are of local distinctiveness..part of..cherished local scene".

This only applies to favoured places: Rochford, Rayleigh, greenbelt villages. Many Hockley conservable items have been systemically removed for supposedly lucrative development in face of widespread protect. This is for supposed need for housing. In fact heritage items have been replaced by dwellings most cannot afford, and/or are hard to sell due to unsuitability of massing and siting. Many other homes are jeopardised by this practice.

HAAP issues 2009. Core Strategy 2006, 2007,2008, SCI.2006

Fewer 'vested interests', more even handedness. No more pressing people out of businesses, homes for expediency.

A CPRE Fieldwork issue extolled Local Lists, citing refusal of 16 flats to replace character house, not on local list. Inspector said house, facade made a contribution to area character, even if English heritage decided it didn't warrant listing. Council worked to get the house grade listed and even made adjacent area conservation one.

Hockley had one such on a "significant site" faced with 13 flats. Ward Member omitted house from refusal proposal, so house could be demolished. RDC dropped Local List ahead of appeal: "Government frowned on such Lists" (Other LAs, unaware of supposed directive retained theirs. After demolition RDC restored Local Lists, saying Government now support them. When Inspector queried the complaint, the then policy officer said "just politics, lot of local interest, nothing of character in the area[!]. (A dozen such items had been removed). Some "distinctive" Hockley buildings are still condemned (in Greensward Lane., others threatened (Spa Road). Whereas a modest hue and cry in Rayleigh will usually result in a building being saved.

Conclusion

Core Strategy Submission DPD is basically unsound in many respects

Incomplete information. Amongst others, it refers to Hockley AAP, the first stage of which is complete, but not other three. Rochford AAP first stage has been published in arrears of Core Strategy Submission. Rayleigh AAP is still awaited. Precise housing sites are absent, as Urban Capacity Study 2007 has been superseded by Strategic Housing Land Availability Assessment, not yet published. Traders, residents, are thus responding to Core Strategy Submission with incomplete information.

Lack of community involvement. Chapter 1, Introduction, para. 1.11 "Community involvement is an essential part of the plan making process".

In Statement of Community Involvement 2006 Rochford RDC "recognises need to enable people to have their voices heard".

Re Public Meetings: "Consideration will be had to timing and venue to ensure meeting is as accessible as possible".

Take Hockley Area Action Plan as an example of the opposite of all this:- Presentation of document was at Hullbridge, 7.30pm. It was also discussed with JAAP at Rochford Freight House (for traders only) at 7am, without publicity. Excuse made: HAAP on RDC website, which none will seek unless knowing it is there. Rochford District Matters newsheet had minute articles on p.3, half way through consultation period. Another excuse: a 2nd presentation by Hockley Residents Association with planning officer present: only because of complaints, and it is not the HRA's responsibility to RDC's job. Due to unavoidable haste of calling meeting, few knew and only 50 were present.

In Core Strategy Submission Hockley Parish Plan has been ignored. Proposals also ignore 95% rejection rate response to HAAP 2009, which included proposals for Eldon Way employment site.

Unfettered right of developers to carry on as if Core Strategy didn't exist. In PPS 12, Ch.4.6 states: "Core Strategies should be flexible and able to show how they handle contingencies". Several large planning applications have been submitted proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS 12.

Where are we? Finally, at Chapter 1, Introduction, para. 1.24: "the Core Strategy will have to be reviewed in the event of a new Local Area Agreement, post-2011, setting different priorities". So what purpose does all this work serve? So we have hardly finished this exercise, before it all starts again?

Summary:

Chapter 5: Character of Place and Local Lists

Para.5.4 "Rochford district has unique character..stems from traditional buildings..still dominate towns and villages".

Core Strategy Submission Document

16724 Object

CHAPTER 5 Local Lists, 5.17

Para.5.17 "Council believes many buildings..are of local distinctiveness..part of..cherished local scene".

This only applies to favoured places: Rochford, Rayleigh, greenbelt villages. Many Hockley conservable items have been systemically removed for supposedly lucrative development in face of widespread protect. This is for supposed need for housing. In fact heritage items have been replaced by dwellings most cannot afford, and/or are hard to sell due to unsuitability of massing and siting. Many other homes are jeopardised by this practice.

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Change to Plan

Fewer 'vested interests', more even handedness. No more pressing people out of businesses, homes for expediency.

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16765 - 14229 - Local Lists, 5.17 - i, iii

16765 Object

CHAPTER 5 Local Lists, 5.17

Respondent: Hockley Under Threat (J Abbey) [14229]

Hockley Under Threat
None provided

Agent: N/A

Full Text:

Ch. 4 Housing; Ch.10 Transport, Highways; Ch.11 Economic Development; Ch.12 Retail/town centres; Ch.5 Character of place & Local Lists

Chapter 4: Housing

Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1, Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2

N.E.Hockley was discarded as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley...along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

Need to be logical and even-handed in proposals

June 2009 issue C S Submission issue says Eldon Way will be used for housing, whereas Sept.2009 issue says "alternative uses, including residential.." to be decided by HAAP (Issues consultation done, Pref.Options issue awaited, but judging from JAAP Pref.Options decision - namely biggest option chosen against overriding opposition, it will be housing).

Policy H1, T1 Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG14 & PPS1. it also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths",

The Core Strategy also contravenes its own policy T1 and is unsound.

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

Establish like motorways with wholesale demolition.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts.

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Para.10.5

Policy T3, CLT1 Appendix CLT1

T1 & T2 "...highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which

16765 Object

CHAPTER 5 Local Lists, 5.17

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Ch.11 Economic development

Policy ED3 Core Strategy preferred Options 2008 hinted at possible housing in Eldon Way site. June 2009 Submission version, without consultation, said Eldon Way would be housing (map included Foundry, not the text). September 2009 Submission said redevelopment would be in HAAP (which apart from the Issues/Options version, is unfinished. Judging from results of JAAP Preferred Options where biggest option is chosen, though most respondents were against it, site will be housing, without consultation.

Para.1.25 Para.11.32

Policy ED4 T1 & T2 Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to accommodated employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

Remove compulsory relocation

Policy states Council will allocate 18ha of land to make up for de-allocations in ED3 - that proves point above.

Proposals for moving employment to out of town locations with no existing transport links are contrary to government policies PPG4, PPS1 and PPS4 and Core Strategy Policy T1.

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Revise both 2009 Core Strategy and 2009 HAAP Issues/options

Move to new industrial site near airport contravenes PPS4:

EC7.3C "out of centre sites, with preference given to sites..well served by choice of..transport and..close to centre and..high likelihood of forming links with centre". There is no current public transport and links with centres is unlikely".

EC 7.5.1 "whether the site is or will be accessible and well served by choice of transport, public transport, walking and cycling, as well as by car..". Remote location, narrow busy B1013 makes the site unsuitable for access by cycle or on foot.

It also contravenes PPS1 (27vii).. "reduce need to travel, encourage accessible public transport provision to secure more sustainable patterns of transport..Planning should actively manage patterns of urban growth to make fullest use of public transport and focus development in existing centres, near to major public transport interchanges". Core Strategy undermines its own policy Transport and Highways policy T1 and is unsound.

H1 & RTC6 Although shown on accompanying drawing in earlier versions, there was no prior textual mention of Foundry industrial estate (next to Eldon Way) for redevelopment until current CS 2009 Submission. In recent amendment to the CS this was stated to be due to a typing error!

Chapter 12: Retail/Town centres

The Core Strategy misrepresents findings of the Retail and Leisure Study 2008.

Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

Para.12.38 H1 & RTC6 The Core Strategy states (para.12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace."

Whereas the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food

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O - 16765 - 14229 - Local Lists, 5.17 - i, iii

16765 Object

CHAPTER 5 Local Lists, 5.17

shopping expenditure".

2) (10.28) "There is no immediate capacity for additional floorspace".

3) (10.29) "we recommend focus be maintained on developing Hockley's existing strengths, rather than retail expansion"

4) 10.31 "the current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it has a very small catchment population. Accordingly, the council may wish to consider reclassifying Hockley from a town centre to a district centre".

Remove threat of compulsory purchase orders.

The Council will work with landowners and its partners to deliver the HAAP.

Chapter 5: Character of Place and Local Lists

Para.5.4 "Rochford district has unique character..stems from traditional buildings..still dominate towns and villages".

Para.5.17 "Council believes many buildings..are of local distinctiveness..part of..cherished local scene".

This only appears to apply to certain places: Rochford, Rayleigh, greenbelt villages. Many Hockley conservable items have been systemically removed for supposedly lucrative development in face of widespread protect. This is for supposed need for housing. In fact heritage items have been replaced by dwellings most cannot afford, and/or are hard to sell due to unsuitability of massing and siting. Many other homes are jeopardised by this practice.

Conclusion

Core Strategy Submission DPD is basically unsound in many respects:

Incomplete information. Amongst others, it refers to Hockley AAP, the first stage of which is complete, but not other three. Rochford AAP first stage has been published in arrears of Core Strategy Submission. Rayleigh AAP is still awaited. Precise housing sites are absent, as Urban Capacity Study 2007 has been superseded by Strategic Housing Land Availability Assessment, not yet published. Traders, residents, are thus responding to Core Strategy Submission with incomplete information.

Lack of community involvement. Chapter 1, Introduction, para. 1.11 "Community involvement is an essential part of the plan making process". In Statement of Community Involvement 2006 Rochford RDC "recognises need to enable people..to have their voices heard".

Re Public Meetings: "Consideration will be had to timing and venue to ensure meeting is as accessible as possible".

Hockley Area Action Plan as an example of the opposite of all this:- Presentation of document was at Hullbridge, 7.30 p.m. It was also discussed with JAAP at Rochford Freight House (for traders only) at 7 a.m., without publicity. Excuse made: HAAP on RDC website, which none will seek unless knowing it is there. Rochford District Matters newssheet had minute articles on p.3, half way through consultation period. Another excuse: a second presentation by Hockley Residents Association with planning officer present: only because of complaints, and it is not the HRA's responsibility to RDC's job. Due to unavoidable haste of calling meeting, few knew and only 50 were present.

In Core Strategy Submission Hockley Parish Plan has been ignored. Proposals also ignore 95% rejection rate response to HAAP 2009, which included proposals for Eldon Way employment site.

Unfettered right of developers to carry on as if Core Strategy didn't exist. In PPS 12, Ch.4.6 states: "Core Strategies should be flexible and able to show how they handle contingencies". Several large planning applications have been submitted proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS 12.

Where are we? Finally, at Chapter 1, Introduction, para. 1.24: "the Core Strategy will have to be reviewed in the event of a new Local Area Agreement, post-2011, setting different priorities". So what purpose does all this work serve? So we have hardly finished this exercise, before it all starts again?

Summary:

"Rochford district has unique character..stems from traditional buildings..still dominate towns and villages".
"Council believes many buildings..are of local distinctiveness..part of..cherished local scene".

This only appears to apply to certain places: Rochford, Rayleigh, greenbelt villages. Many Hockley conservable items have been systemically removed for supposedly lucrative development in face of widespread protect. This is for supposed need for housing. In fact heritage items have been replaced by dwellings most cannot afford, and/or are hard to sell due to unsuitability of massing and siting. Many other homes are jeopardised by this practice.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i, iii

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

Core Strategy Submission Document

S - 15977 - 13441 - Policy CP3 - Local List - None

15977 Support

CHAPTER 5 Policy CP3 - Local List

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: See also Para. 5.18. 'The Council will reintroduce a Local List for the District' is a statement of policy. Its supportive text should explain about the protection the SPD will give to local buildings with special architectural and historic value.

Summary: See also Para. 5.18. 'The Council will reintroduce a Local List for the District' is a statement of policy. Its supportive text should explain about the protection the SPD will give to local buildings with special architectural and historic value.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16842 - 7704 - Policy CP3 - Local List - None

16842 Support

CHAPTER 5 Policy CP3 - Local List

Respondent: English Heritage (Ms K Fletcher) [7704]

Agent: N/A

English Heritage
Brooklands
24 Brooklands Avenue
Cambridge
CB2 2BU

Full Text: ROCHFORD LOCAL DEVELOPMENT FRAMEWORK
CORE STRATEGY SUBMISSION DOCUMENT

Thank you for your letter dated 21 September 2009 consulting English Heritage on the above document. Our comments are set out below.

CHAPTER 4 HOUSING

Vision and objectives

While we note that character of place is addressed in chapter 5, it is important that this consideration is recognised as relevant within the Housing chapter. Paras 2.33, 2.69 and 2.73 also recognise the importance of character and sense of place in the built environment. We recommend that this consideration should be integrated into the vision and objectives for housing in order to improve the clarity of the plan, and its consistency with advice in PPS1.

Recommendation:

The following amendments are suggested:

- Vision in five years: add 'settlement character' after 'infrastructure'
- Vision by 2025: add 'and places' after 'communities' in bullet 1
- Objectives: In objective 2 amend to '...sustainable locations, enhancing sense of place and having regard to..'
- Para 4.19: Amend bullet 5 to read 'The historical, agricultural and ecological value of land, and settlement character'

CHAPTER 5 CHARACTER OF PLACE

We strongly support this section and policies CP1, CP2 and CP3. In the absence of policy coverage for listed buildings and scheduled monuments we recommend that para 5.9 should refer to PPGs 15 and 16, as well as draft PPS15.

CHAPTER 8 ENVIRONMENTAL ISSUES

We welcome the references the historic environment in the objectives and in policies ENV1 and ENV2.

Policy ENV6 Large Scale Renewable Energy Projects

We consider that this policy should refer to the historic interest of sites to reflect the advice in PPS22 more appropriately.

Recommendation: amend the first bullet in policy ENV6 to read '...it's ecological, historic or landscape value...'

CHAPTER 11 ECONOMIC DEVELOPMENT

Policy ED2 London Southend Airport

We understand that the grade I listed church in the vicinity of the runway will be protected in any proposals for expansion of the airport and the Core Strategy policy does not suggest otherwise. We will respond to the detail of proposals for the airport through responses to consultations on the Joint Area Action Plan and any planning applications.

In the interests of clarity, the above comments where we suggest changes to the Core Strategy should be recorded as objections to the soundness of the plan in terms of consistency with national guidance. However, we hope that it will be possible to agree amendments on these points prior to the public examination.

We would be happy to discuss any of these comments if you would find this useful.

Summary: CHAPTER 5 CHARACTER OF PLACE

We strongly support this section and policies CP1, CP2 and CP3.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 15736 - 7446 - Vision - iii

15736 Object

CHAPTER 6 Vision

Respondent: Steven Abbott Associates North Quarry Office (Mr A Skelton) [7446] **Agent:** N/A

Steven Abbott Associates North Quarry Office
North Quarry Business Park
Appley Bridge
Wigan
Lancashire
WN6 9DB
01257 251177

Full Text: The DPD does not fully recognise the policy in PPG2. The Vision should also allow for consideration of major developed sites to continue to be identified within the PPG2 Annex C policy framework. PPG2 recognises potential environmental/openness benefits of redevelopment of such sites and the Core Strategy vision for Green Belts should include similar recognition - if only by reference to policy in PPG2.

Summary: The DPD does not fully recognise the policy in PPG2. The Vision should also allow for consideration of major developed sites to continue to be identified within the PPG2 Annex C policy framework. PPG2 recognises potential environmental/openness benefits of redevelopment of such sites and the Core Strategy vision for Green Belts should include similar recognition - if only by reference to policy in PPG2.

Change to Plan An additional bullet point reflecting the policy in PPG2 relating to the identification of major developed sites in the Green Belt.

Appear at exam? Yes **Soundness Tests** iii

Core Strategy Submission Document

S - 16101 - 7336 - Introduction, 6.1 - None

16101 Support

CHAPTER 6 Introduction, 6.1

Respondent: Rayleigh Town Council (Mrs K Cumberland) [7336] **Agent:** N/A

Rayleigh Town Council
The Pavilion
King George V Playing Field
Bull Lane
Rayleigh
Essex
SS6 8JD

01268 741880

Full Text: Strongly support this

Summary: Strongly support this

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16090 - 7336 - Introduction, 6.3 - i

16090 Object

CHAPTER 6 Introduction, 6.3

Respondent: **Rayleigh Town Council (Mrs K Cumberland) [7336]** **Agent:** **N/A**

Rayleigh Town Council
The Pavilion
King George V Playing Field
Bull Lane
Rayleigh
Essex
SS6 8JD

01268 741880

Full Text:) P65 Para.6.3 The majority of the District's 12763 hectares of Green Belt is located in the east of the District. The preference for "north of London Rd" would see the release of a disproportionate amount of green belt land in the west of the District and therefore this statement is considered to be unsound.

Summary:) P65 Para.6.3 The majority of the District's 12763 hectares of Green Belt is located in the east of the District. The preference for "north of London Rd" would see the release of a disproportionate amount of green belt land in the west of the District and therefore this statement is considered to be unsound.

Change to Plan see comments aboved

Appear at exam? No **Soundness Tests** i

Core Strategy Submission Document

S - 16374 - 8267 - Introduction, 6.3 - None

16374 Support

CHAPTER 6 Introduction, 6.3

Respondent: Aber Ltd [8267]

Aber Ltd
C/o Agent

Agent: Colliers CRE (Mr S Chapman) [8266]

Colliers CRE
9 Marylebone Lane
London
W1U 1HL
020 7344 6533

Full Text: Agree that the minimum amount of Green Belt is allocated to meet the District's housing need, and that the extensions to the residential envelope are in sustainable locations, and prevent the coalescence of settlements.

In addition, some Green Belt land is less worthy of continued protection, as it does not necessary contribute as strongly to the reasons for maintaining it as Green Belt.

It is interesting to note that whilst the Council will continue a restrictive policy towards employment growth in the Green Belt; this appears to contradict Policy ED4 that advises that certain locations will be released to accommodate new employment sites to compensate for the loss of locations in the existing settlements.

Summary: Agree that the minimum amount of Green Belt is allocated to meet the District's housing need, and that the extensions to the residential envelope are in sustainable locations, and prevent the coalescence of settlements.

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It is interesting to note that whilst the Council will continue a restrictive policy towards employment growth in the Green Belt; this appears to contradict Policy ED4 that advises that certain locations will be released to accommodate new employment sites to compensate for the loss of locations in the existing settlements.

Change to Plan N/A

Appear at exam? Not Specified

Soundness Tests N/A

Core Strategy Submission Document

O - 15737 - 7446 - Protection of the Green Belt, 6.6 - iii

15737 Object

CHAPTER 6 Protection of the Green Belt, 6.6

Respondent: Steven Abbott Associates North Quarry Office (Mr A Skelton) [7446] **Agent:** N/A

Steven Abbott Associates North Quarry Office
North Quarry Business Park
Appley Bridge
Wigan
Lancashire
WN6 9DB
01257 251177

Full Text: Whilst stating continued support of restricting development as set out in PPG2 this paragraph does not accept or recognise what PPG2 Annex C indicates regarding major developed sites in the Green Belt.

Summary: Whilst stating continued support of restricting development as set out in PPG2 this paragraph does not accept or recognise what PPG2 Annex C indicates regarding major developed sites in the Green Belt.

Change to Plan Additional text relating to the policy context for major developed sites in the Green Belt set out in PPG2. The Core Strategy must indicate that such sites will be identified (as they have been previously) and provide a policy context consistent with national policy in PPG2.

Appear at exam? Yes **Soundness Tests** iii

Core Strategy Submission Document

S - 16375 - 8267 - Protection of the Green Belt, 6.6 - None

16375 Support

CHAPTER 6 Protection of the Green Belt, 6.6

Respondent: Aber Ltd [8267]

Aber Ltd
C/o Agent

Agent: Colliers CRE (Mr S Chapman) [8266]

Colliers CRE
9 Marylebone Lane
London
W1U 1HL
020 7344 6533

Full Text: Agree that the minimum amount of Green Belt is allocated to meet the District's housing need, and that the extensions to the residential envelope are in sustainable locations, and prevent the coalescence of settlements.

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Summary: Agree that the minimum amount of Green Belt is allocated to meet the District's housing need, and that the extensions to the residential envelope are in sustainable locations, and prevent the coalescence of settlements.

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It is interesting to note that whilst the Council will continue a restrictive policy towards employment growth in the Green Belt; this appears to contradict Policy ED4 that advises that certain locations will be released to accommodate new employment sites to compensate for the loss of locations in the existing settlements.

Change to Plan N/A

Appear at exam? No

Soundness Tests N/A

Core Strategy Submission Document

O - 16474 - 7342 - Protection of the Green Belt, 6.6 - i

16474 Object

CHAPTER 6 Protection of the Green Belt, 6.6

Respondent: Rawreth Parish Council (Mrs H Bloomfield) [7342] **Agent:** N/A

Rawreth Parish Council
103 Downhall Park
Way Rayleigh
Essex
SS6 9QZ
01268 631821

Full Text:

LDF - Preferred Options - Rayleigh conurbation.

On behalf of Rawreth Parish Council I confirm that this letter is a formal response of objection to the final draft of Rochford District Councils Core Strategy Preferred Options document.

Firstly, at no time has the Parish of Rawreth been included or mentioned in any "Tier" on page 33 of the document, the criteria for allocation of houses - within the Core Strategy. If it had been included it should have been in Tier 4 and this is, therefore, UNSOUND.

The Parish Council believes that to develop 550 houses in one place within area no: 144, land to the north of London Road and then to add a further 220 to the Rawreth Industrial Estate area will totally destroy the character and rural outlook of Rawreth and surrounding areas. It will destroy the residents' "strong sense of identity within their own settlement" and is, therefore, UNSOUND.

The huge development of 550 houses is totally unacceptable. The land north of London Road is good quality agricultural land which is protected by the Green Belt -GB1 - fulfils all purposes under PPG2 and should be retained as such. Once used for development this land can never be returned to agricultural use, and if you continue to erode into our Green Belt and farmland it will be lost forever.

The Parish Council believe a proportion of the houses required to be built in our area should compliment and enhance Rawreth, cause as little extra congestion to our already heavily overcrowded roads as possible and provide a pleasant environment for those people wishing to move to the area. This particular area is part of the "Gateway to Rochford" and is the "strategic buffer" between Rayleigh and Wickford. Reference is made in the Core Strategy document to "avoiding coalescence" of villages/towns, however a development of this size immediately erodes the buffer between Rayleigh, Rawreth and Wickford, starts coalescence, destroys the rural character of Rawreth and, therefore, is UNSOUND.

The Core Strategy Document details Rochford District Councils priorities and objectives and details how the role of the Core Strategy features in achieving these. In support of the Parish Councils observations and alternative proposals they comment as follows.

Page 5 "Fostering greater community cohesion"

Development of land between Rawreth Lane and north of London Road will not give any community cohesion at all, it will simply be an extension to the west of Rayleigh giving residents no real sense of belonging, they will live within the Parish of Rawreth, yet they will be considered as living in Rayleigh as has been proved with other developments along Rawreth Lane such as Laburnum Way.

Page 12 "Priority 5 Essex roads are safer less congested and everyone has access to essential services"

The roads and infrastructure in the Rawreth area are completely full to capacity. The A127, A1245, A129 London Road, Rawreth Lane and Watery Lane just cannot take any more traffic and the proposed development on land to the north of London Road will increase traffic to a completely unsustainable level. On numerous occasions this year incidents within and on the outskirts of the Parish have brought traffic to a standstill for hours along London Road, Rawreth Lane, Watery Lane/Beeches Road and the Hullbridge Road. It took some residents 1 ¼ hours to proceed along Rawreth Lane and into Hullbridge - a distance of 1 1/2 miles.

The proposed development at the western edge of Hullbridge, which is, in fact, largely in Rawreth would also greatly increase the traffic problems in the area. Rawreth Parish Council understand there would be a proposal to "widen/straighten" Watery Lane/Beeches Road, with a roundabout at the junction with the Hullbridge Road. This is an extremely dangerous junction even at the present time and would become increasingly so. There is also the question of where the traffic would go when it reaches Battlesbridge at the Western end, it cannot possibly cross the Bridge as this is "restricted" and in a Conservation Area, therefore, it would have to turn left and proceed to the A1245 - a very dangerous junction.

Beeches Road/Watery Lane is also shown in the document as a new cyclist route. Surely this is a conflict of interest, a road widening/straightening proposal coupled with a cycle route.

Page 33 "Tier Settlements"

Nowhere in the Core Strategy Document is Rawreth Parish actually mentioned, it features in the "all other settlements tier 4" and is referred to as "land north of London Road Rayleigh" or "West Rayleigh" yet, the housing allocation of 550 dwellings between 2015 and 2021 and the 220 planned for the Rawreth Industrial Estate is the largest that any area is taking. Rawreth Parish currently has 380 dwellings and an electorate of 812, yet the proposed housing figures are set to increase the overall number of dwellings in the Parish by 203%.

Pages 34 to 36 "The efficient use of land for housing" and "Extensions to residential envelopes and phasing"

The Core Strategy Document states that "the Council recognises the importance of making best use of brownfield land" and "whilst the Council acknowledge that the housing requirement stipulated in the East of England Plan is a minimum, it must also be mindful of the need to maintain Green Belt as far as possible" yet the proposed 550 houses on the land

16474 Object

CHAPTER 6 Protection of the Green Belt, 6.6

north of London Road will all be built on Green Belt land of high agricultural value. The document states that "the Council will direct development to the most sustainable locations on the edge of settlements having regard to:"

"The potential to avoid areas of constraint (such as areas at risk of flooding, sites of ecological importance"

"The historical, agricultural and ecological value of land"

"The potential to create a defensible Green Belt Boundary and

"The avoidance of coalescence with neighbouring settlements"

Yet these key factors all seem to have been ignored when choosing the site to the north of London Road and, therefore, the proposal is UNSOUND. The Parish of Rawreth has a history of flooding, the land in Rawreth Lane will drain into the already overloaded brook system and the Services in the area would be unable to cope with this increase in housing - drains and sewers are already working to capacity. Heavy rain earlier in the year resulted in flooding in Watery Lane and the Rawreth Brook system has been very close to flooding twice already this year. During a meeting between the Parish Council and the Environment Agency we were advised that this situation will worsen with increased housing.

Page 42 "Gypsy and Traveller Accommodation"

This section details the need for an allocation of 15 pitches by 2011, it also states that they "will examine the potential of current unauthorised sites to meet this need" and that "sites will be allocated in the west of the District" The west of the District is in fact Rawreth, but yet again the Parish name has not been detailed. The Parish already has an unauthorised site which is the subject of an enforcement case and although well kept is on the brow of a hill on a main highway with restricted access which Essex County Council have already raised concerns about, this is not a site that should be considered as part of the requirement due to its location, but also, why is the allocation of all 15 pitches being detailed to one area?

Page 43 to 44 "Appendix 1"

Details of all the infrastructure to accompany residential development is listed, yet there are no detailed costs, have these been done? And are these achievable? Large numbers of housing in one area, as stated in the infrastructure requirements, will necessitate a new primary school. County figures suggest that there will be surplus places in Rayleigh schools even with new housing. Obviously these will be in the wrong parts of the town so increasing the risk that an existing school could close. It makes sense to spread the development in smaller sites around the town, avoiding closure and preventing unnecessary provision of a new school.

Page 57 "Strategies, Activities and Actions - The Green Belt"

The document states that "The Council will continue to support the principals of restricting development in the Green Belt, as set out in PPG2 and will preserve the character and openness of the Green Belt" it further states that "a small proportion of the District's Green Belt will have to have its designation reviewed to allow development" The entire development of 550 houses planned for land north of London Road is all on Green Belt land as is the land at Hullbridge, how does this equate to a "small proportion"?

The Councils own Policy GB1- Green Belt Protection states "The Council will allocate the minimum amount of Green Belt land necessary to meet the District's housing and employment needs" and that they will "direct development away from the Green Belt as far as is practicable and will prioritise the protection of the Green Belt land based on how well the land helps achieve the purposes of the Green Belt".

This area of land confirms all 5 purposes of the national PPG2 - Green Belt:-

It prevents the unrestricted sprawl of western Rayleigh

It provides a barrier to prevent the ultimate merging of Rayleigh, Rawreth and Wickford

It assists in safeguarding the countryside from encroachment

It preserves the setting and special character of historic towns

Assists in urban regeneration, by encouraging the recycling of derelict and other urban land

Rawreth Parish Council have observed that there are a number of sites that were put forward in the "Call for Sites" that are pre-used brownfield land in the Green Belt land, and as such would prove beneficial and in their opinion should have been considered for development. Their non-inclusion as "brownfield" sites makes the current proposals

UNSOUND:

Site No; 73 Hambro Nursery a site of approximately 3.93 hectares, coupled with the adjacent site Clovelly, would provide between 200 and 250 houses in an area of approximately 4.85 hectares this area would have good access directly from the A1245 and if expanded north westward to include land up to and around the Village Hall, approximately another 2.08 hectares could produce between 50 and 80 further houses. This area could be accessed either from the slip road (Chelmsford Road) to the south of the Nevendon Garage or from Church Road.

Both of these sites would remove the need for extra traffic along the A129 and Rawreth Lane which are both already operating well over maximum capacity. This development would require a footbridge for pedestrians, cyclists and horses over the A1245.

Rawreth Parish Council believe these proposals would be sensible infill of these areas and would be on "Brownfield" sites where current businesses are not particularly progressive and would not result in the loss of many jobs. Our figures are quite conservative and we believe that if these sites were chosen a much reduced number of houses would need to be built "North of London Road" on Green Belt land.

Phase 2 - With regard to the houses that are proposed for the Northeast corner of Rawreth/Hullbridge, the Parish Council are concerned that any development would cause considerable extra congestion to the immediate roads. We understand that the thoughts are to "straighten" and improve parts of Watery Lane and Beeches Road to provide access to and through Battlesbridge - a conservation area. Recent experience of deep flooding in Watery Lane with the road closed for several days on 3 occasions in the early part of 2009 proves that this proposal is completely unsustainable. The local drainage systems simply cannot take the amount of run-off experienced now and with further development this

Core Strategy Submission Document

16474 Object

CHAPTER 6 Protection of the Green Belt, 6.6

would increase the problem.

If this development is to go ahead, the Parish Council believe that a relief road should be built, from the end of Watery Lane, skirting to the west of the Rayleigh Park Estate, crossing Rawreth Lane at a mini-roundabout and entering a vastly improved A129 at approximately Lower Barn Farm. This would take any necessary traffic in and out of the area efficiently.

The Parish Council further believe that the Michelins Farm site No: 49 would be an ideal site for the Rawreth Industrial Estate. This would adjoin proposed industrial sites within the Basildon District and would provide excellent road and transport links. Rawreth Parish Council also proposed that the land opposite Michelins Farm could be used to re-site the illegal Gypsy/Traveller site that is currently situated on the busy A1245. The land opposite Michelins Farm would not only be a much safer site for Gypsy/Traveller pitches, but the correct use of the land would also ensure the environmental improvement of the site as a whole.

All of the above proposals were submitted to Rochford District Council, but they were not taken into consideration in the final draft resulting in the predominant use of Green Belt land for development, bounded by already congested roads and, therefore, the proposals are UNSOUND.

Summary:

Page 57 "Strategies, Activities and Actions - The Green Belt"

The document states that "The Council will continue to support the principals of restricting development in the Green Belt, as set out in PPG2 and will preserve the character and openness of the Green Belt" it further states that "a small proportion of the District's Green Belt will have to have its designation reviewed to allow development" The entire development of 550 houses planned for land north of London Road is all on Green Belt land as is the land at Hullbridge, how does this equate to a "small proportion"?

The Councils own Policy GB1- Green Belt Protection states "The Council will allocate the minimum amount of Green Belt land necessary to meet the District's housing and employment needs" and that they will "direct development away from the Green Belt as far as is practicable and will prioritise the protection of the Green Belt land based on how well the land helps achieve the purposes of the Green Belt".

This area of land confirms all 5 purposes of the national PPG2 - Green Belt:-

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Assists in urban regeneration, by encouraging the recycling of derelict and other urban land

Rawreth Parish Council have observed that there are a number of sites that were put forward in the "Call for Sites" that are pre-used brownfield land in the Green Belt land, and as such would prove beneficial and in their opinion should have been considered for development. Their non-inclusion as "brownfield" sites makes the current proposals UNSOUND:

Change to Plan

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Both of these sites would remove the need for extra traffic along the A129 and Rawreth Lane which are both already operating well over maximum capacity. This development would require a footbridge for pedestrians, cyclists and horses over the A1245.

Rawreth Parish Council believe these proposals would be sensible infill of these areas and would be on "Brownfield" sites where current businesses are not particularly progressive and would not result in the loss of many jobs. Our figures are quite conservative and we believe that if these sites were chosen a much reduced number of houses would need to be built "North of London Road" on Green Belt land.

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 15738 - 7446 - Protection of the Green Belt, 6.7 - iii

15738 Object

CHAPTER 6 Protection of the Green Belt, 6.7

Respondent: Steven Abbott Associates North Quarry Office (Mr A Skelton) [7446] **Agent:** N/A

Steven Abbott Associates North Quarry Office
North Quarry Business Park
Appley Bridge
Wigan
Lancashire
WN6 9DB
01257 251177

Full Text: We generally agree and support this paragraph as it quite rightly recognises that not all Green Belt land is of a high quality and that it does include developed/brownfield land. There should be reference to major developed sites - how they will be identified and recognised and dealt with in policy terms.

Summary: We generally agree and support this paragraph as it quite rightly recognises that not all Green Belt land is of a high quality and that it does include developed/brownfield land. There should be reference to major developed sites - how they will be identified and recognised and dealt with in policy terms.

Change to Plan Additional text indicating how major developed sites in the Green Belt will be identified and dealt with in policy terms

Appear at exam? Yes **Soundness Tests** iii

Core Strategy Submission Document

S - 16376 - 8267 - Protection of the Green Belt, 6.7 - None

16376 Support

CHAPTER 6 Protection of the Green Belt, 6.7

Respondent: Aber Ltd [8267]

Aber Ltd
C/o Agent

Agent: Colliers CRE (Mr S Chapman) [8266]

Colliers CRE
9 Marylebone Lane
London
W1U 1HL
020 7344 6533

Full Text: Agree that the minimum amount of Green Belt is allocated to meet the District's housing need, and that the extensions to the residential envelope are in sustainable locations, and prevent the coalescence of settlements.

In addition, some Green Belt land is less worthy of continued protection, as it does not necessary contribute as strongly to the reasons for maintaining it as Green Belt.

It is interesting to note that whilst the Council will continue a restrictive policy towards employment growth in the Green Belt; this appears to contradict Policy ED4 that advises that certain locations will be released to accommodate new employment sites to compensate for the loss of locations in the existing settlements.

Summary: Agree that the minimum amount of Green Belt is allocated to meet the District's housing need, and that the extensions to the residential envelope are in sustainable locations, and prevent the coalescence of settlements.

In addition, some Green Belt land is less worthy of continued protection, as it does not necessary contribute as strongly to the reasons for maintaining it as Green Belt.

It is interesting to note that whilst the Council will continue a restrictive policy towards employment growth in the Green Belt; this appears to contradict Policy ED4 that advises that certain locations will be released to accommodate new employment sites to compensate for the loss of locations in the existing settlements.

Change to Plan N/A

Appear at exam? No **Soundness Tests** N/A

Core Strategy Submission Document

O - 16615 - 5219 - Protection of the Green Belt, 6.7 - i, ii

16615 Object

CHAPTER 6 Protection of the Green Belt, 6.7

Respondent: Fairview New Homes Ltd [5219]

Fairview New Homes Ltd
50 Lancaster Road
Enfield
Middlesex
EN2 0BY
020 83661271

Agent: Planning Potential (Miss G Brickwood) [7549]

Planning Potential
Palace House
3 Cathedral Street
London
SE1 9DE
0207 357 8000

Full Text: Representations on behalf of Fairview New Homes

1. We are instructed by our client, Fairview New Homes, to submit comments on the published Core Strategy Submission Document. For ease specific reference has been made in accordance with the paragraph and policy numbers as contained in the published document. We would like the opportunity to represent our Client at the forthcoming Examination of the Core Strategy DPD and would be grateful for confirmation that this is possible.

2. Fairview New Homes have an interest in a parcel of land to the South West of Rayleigh Town Centre, as indicated on the attached site location plan. This land was previously identified in the Core Strategy Preferred Options documents to provide an urban extension to the south west of Rayleigh. This option has now been withdrawn in the Core Strategy Submission document and it is on this basis these representations are provided to the Council.

3. The Submission Core Strategy has been considered against the requirements set out at Paragraph 4.36 of PPS12 requiring core strategies to be justifiable and effective in order to be found sound, as follows:

Justified:

- i. Founded on a robust and credible evidence base
- ii. The most appropriate strategy when considered against the reasonable alternatives

Effective:

- i. Deliverable - the Core Strategy should show how the vision, objectives and strategy for the area will be delivered and by whom, and when, including who is responsible for implementing different elements of the strategy and when
- ii. Flexible - a strategy is unlikely to be effective if it cannot deal with changing circumstances. Plans should show how they will handle contingencies.
- iii. Able to be monitored - monitoring is essential for an effective strategy and will provide the basis on which the contingency plans within the strategy would be triggered.

4. To summarise our comments, Fairview New Homes strongly object to the Core Strategy as is currently presented on the basis the document is currently unsound for a number of reasons:

â€¢ The lack of robust and credible evidence base

â€¢ Failure to clearly discount reasonable alternatives

â€¢ The effectiveness of the plan is also considered to be flawed and the Council's approach to deliverability and flexibility is questioned.

5. Fundamentally, we question the soundness of the Core Strategy due to the lack of available evidence to support the choices made by the Council. In particular, there is a strong reliance on the findings of the 2009 Strategic Housing Land Availability Assessment (SHLAA) although it is understood this document is not due to be published for consideration alongside the Core Strategy. We, therefore, reserve the right to submit additional comments to the Core Strategy consultation following the publication of the SHLAA.

6. The 2009 SHLAA is clearly listed at Paragraph 1.29 of the submission Core Strategy as one of the evidence base documents the Council have drawn upon when drafting the Core Strategy. The documents listed are all considered to have played an important role in informing the Core Strategy. PPS12 also recognises at Paragraph 4.37 the importance of demonstrating how choices made in the plan are backed up by factual evidence identified in evidence base documents.

7. As a starting point it is important to state it is Fairview New Homes greatest concern there is no background provided within the Core Strategy document, or indeed any of the available evidence base documents, identifying why the Local Planning Authority has chosen to remove some of the sites previously proposed for housing development. In addition, there is also no justification as to why the retained urban extension sites are more suitable than those removed from the draft plan.

8. The following provides specific comments in response to the relevant areas of the Core Strategy.

Housing

9. It is stated at Paragraphs 4.10-4.12 that the Council have adopted a balanced approach when locating new housing between higher tier settlements and lower tier settlements. Although there is no detail provided as to how the Council

16615 Object

CHAPTER 6 Protection of the Green Belt, 6.7

intend on implementing this balanced approach or how the strategic allocation of housing contributes to the balance required. Our Client cannot support this approach until further detail is understood as to the proportion of housing being allocated to each settlement tier.

10. The proposed distribution of housing development during the plan period does not appear to be proportionately allocated between the various settlement tiers. We would argue that development should be distributed proportionately in line with the size of the settlement in order to benefit for available services and facilities. Rayleigh recognised as having best access to services within the district at Paragraph 2.68 of the Core Strategy. On this basis it is considered the development should primarily be directed to Rayleigh with a proportionate level of housing to the remaining settlements in the District.

Policy H1 - The efficient use of land for housing

11. In general the use of residential extensions to meet the remaining housing requirement that cannot be delivered through the redevelopment of appropriate previously developed land is supported by Fairview New Homes.

12. It is understood there is a need to prioritise use of brownfield land in line with national policy requirements but this needs to be a carefully balanced and realistic approach in identifying appropriate urban extensions to accommodate the majority of the District's housing, as identified in the table at Paragraph 4.6 and later at Paragraph 4.15.

13. Policy H1 sets out that the Council will seek the redevelopment of Rawreth Lane Industrial Estate, Foundry Industrial Estate, Stambridge Mills and Star Lane Industrial Estate. Without sight of the 2009 SHLAA it is not possible to understand whether the Council's choice to release employment land for housing is appropriate and Fairview New Homes cannot, therefore, support this element of Policy H1. This objection is further amplified by the fact additional employment land is required but is yet to be identified.

Policy H2 - Extensions to residential envelopes and phasing

14. The Council's intention to provide a balanced strategy for housing provision is mentioned again at Paragraph 4.18. The comments made at Paragraphs 9 and 10 above are also relevant in this respect.

15. In comparing the Preferred Options Core Strategy Document and Submission Core Strategy Document there is a significant reduction in the number of housing units being provided in urban extensions pre 2015, from 1450 dwellings to 775. From discussions with the Local Planning Authority it is understood the Council are seeking to provide the District's housing requirements by increased development densities. From the evidence available in the Submission Core Strategy and summary of SHLAA sites a number of the sites identified as urban extensions have in fact been allocated a reduced number of dwellings, including the land to the north of London Road, Rayleigh. We would, therefore, consider the approach taken by the Local Planning Authority to provide the required level of housing is untenable and unjustified.

16. In discounting preferred options PPS12 makes clear at Paragraph 4.38 the requirement for Local Planning Authorities to consider and evaluate reasonable alternatives. As set out above, the choices the Council have pursued have not been substantiated and without the consideration of reasonable alternatives the Core Strategy cannot be considered justified and therefore unsound.

17. However, this is our opinion based only on discussions with the Local Planning Authority rather than a thorough evidence base and we will consider the evidence in detail when it become available and provide further comment.

18. Paragraph 4.19 of the draft Core Strategy details the Council's primary factors in determining the location of future urban extensions. It is presumed the Council have assessed each of the proposed urban extension sites against the following criteria and that this information is contained within the SHLAA, although we have not been provided with any evidence of this to assess. It can be demonstrated that the land identified on the attached site location plan meets all of the requirements set out below.

â€¢ The proximity and relationship to existing centres, facilities, services

â€¢ The availability of infrastructure and/or the potential for additional infrastructure to be provided for development in such areas

â€¢ The potential to reduce private car dependency

â€¢ The potential to avoid areas of constraint (such as areas at risk of flooding, sites of ecological importance, public safety zone etc)

â€¢ The historical, agricultural and ecological value of land

â€¢ The impact on highway network (including availability and impact on existing network, as well as potential for improvements to be delivered)

â€¢ The relationship of development locations to the District's area of employment growth

â€¢ The potential to create a defensible Green Belt boundary

â€¢ The avoidance of coalescence with neighbouring settlements

19. In summary, Fairview's land is sustainably located in particularly close proximity to Rayleigh Town Centre and train station. In addition, the location of the land provides a natural extension and rounding of settlement boundary. An extension to Rayleigh in this location offers no opportunity for coalescence with neighbouring settlements nor does it constitute urban sprawl.

16615 Object

CHAPTER 6 Protection of the Green Belt, 6.7

Policy H2 - Extensions to residential envelopes and phasing

20. Although it is stated a flexible approach to the timings of the release of land will be maintain no explanation is provided as to why some sites are considered suitable for development pre 2015 and others post 2015. Paragraph 4.22 elaborates further to state a number of factors have been considered when determining the phasing of strategic housing sites although this information is not clearly available to assess.

21. As stated above the principle of releasing certain areas of greenbelt land is considered the best approach to meeting the Council's housing provision requirements. However, Fairview New Homes object to the omission of the land to the South West of Rayleigh for housing development as previously identified in the Core Strategy Preferred Options document. The site identified on the attached site location plan has been assessed against the Council's criteria, as set out at Paragraph 18 above and each requirement can be met. Without any clear explanation as to why this site has been discounted and the only other strategic housing site identified in Rayleigh is located further away from Rayleigh Town Centre and the associated services and facilities including the train station, Fairview New Homes object to Policy H2.

22. As considered at the outset of these representations the draft Core Strategy cannot be considered robust, and therefore sound, without clear justification and evidence base.

Policy H3 - Extension to residential envelopes post-2021

23. Policy H3 is supported on the basis that the release of greenbelt land is required for housing and this is the most appropriate approach to meet the Council's housing requirements, as set out at Paragraph 21 above.

24. However, it is unclear why some of the sites previously identified for housing development pre 2015 up until 2021 in the Preferred Options Core Strategy document have now been allocated for development post 2021, such as South East Ashingdon. It is stated at Paragraph 4.24 of the Submission Core Strategy document those areas identified for post 2021 development may not be immediately deliverable. However, there is no information available to understand why these sites are now no longer considered suitable for pre 2015 development as they were in December 2008. As a result, Fairview New Homes consider Policy H3 to be unjustified and therefore unsound.

Affordable Housing

25. The acute need for additional affordable housing is recognised at Paragraph 4.30. It is unclear from the draft Core Strategy document exactly how much affordable housing is required in the District in the plan period.

26. However, taking the starting point as set out at Paragraph 4.30 that the Thames Gateway South Essex Strategic Housing Market Assessment requires 131 net additional affordable dwellings per year which constitutes 52% of the District's overall annual housing target. In order to achieve this target using the Council's proposed policy requirement that new housing developments are to provide 35% affordable housing, 375 new dwellings would need to be developed each year. This calculation does not account for those developments with fewer than 15 dwellings which have no requirement to provide affordable housing or developments which cannot viably afford to provide non-market housing.

27. An annual requirement of 250 dwellings is identified at Paragraph 4.2 of the Core Strategy which would leave a significant short fall of affordable housing and act to compound the current situation. The approach taken by the Council ultimately accepts there will always be a shortfall in affordable housing provision and does not seek to redress this. We do not, therefore, consider this to be a robust or justified approach to achieving affordable housing in the District.

28. It is, therefore, considered in order to meet the District's affordable housing requirement additional housing land should be identified in order to ensure a wholesale increase in housing provision to address the Council's shortfall in affordable housing and meet the targets set for the plan period. The most appropriate and effective method by which to secure affordable housing provision is through developing large sites that are viably able to offer affordable housing units.

29. During the consultation of the submission Core Strategy the Council's Housing Strategy (2009) was not available and we reserve the right to make further comment on this document following the publication of this evidence.

The Green Belt

30. It is fully accepted by the Council that the Green Belt boundary is currently too tightly drawn and the release of some Green Belt land is necessary to meet the District's development requirements. However, it needs to be demonstrated that the areas of Green Belt land to be lost are justified and located in the most appropriate area and that areas of release land do not undermine the principle of the Green Belt.

31. It is understood from Paragraph 6.7 of the Submission Core Strategy the Council will seek to examine the degree to which current Green Belt land is helping to achieve the purposes of the Green Belt when considering reallocating land. However, areas of Green Belt are proposed to be reallocated for urban extensions prior to this research being undertaken.

Core Strategy Submission Document

O - 16615 - 5219 - Protection of the Green Belt, 6.7 - i, ii

16615 Object

CHAPTER 6 Protection of the Green Belt, 6.7

32. Fairview New Homes fully support the justified retention of the areas of Green Belt where appropriate and the release of Green Belt land where needed. However, at present the proposed Housing policies and Green Belt policies are not coherent and the reallocation of certain areas of Green Belt is not based on a credible evidence base.

Environmental Issues

Policy ENV4 - Sustainable Drainage Systems (SUDS)

33. Fairview New Homes would like to support the flexibility contained within Policy ENV4 which recognises it is not always viably possible to incorporate SUDS in all developments.

Policy ENV8 - On Site Renewable and Low Carbon Energy Generation

34. We would also like to support Policy ENV8 on the same basis as Policy ENV4 in that it is important that the production of energy from renewable or low carbon sources is only required where it is viably possible so as not to resulting in developments not coming forward.

Transport

Policy T8 - Parking Standards

35. Fairview New Homes object to Policy T8 as it is currently contrary to National Policy requirements as set out in PPG13 which contains maximum parking standards. Indeed, this is recognised at Paragraph 10.27 of the Submission Core Strategy document. Enforcing minimum parking standards is not consistent with local or national sustainability aims and should not be an approach pursued by the Council.

Summary:

The Green Belt

30. It is fully accepted by the Council that the Green Belt boundary is currently too tightly drawn and the release of some Green Belt land is necessary to meet the District's development requirements. However, it needs to be demonstrated that the areas of Green Belt land to be lost are justified and located in the most appropriate area and that areas of release land do not undermine the principle of the Green Belt.

31. It is understood from Paragraph 6.7 of the Submission Core Strategy the Council will seek to examine the degree to which current Green Belt land is helping to achieve the purposes of the Green Belt when considering reallocating land. However, areas of Green Belt are proposed to be reallocated for urban extensions prior to this research being undertaken.

32. Fairview New Homes fully support the justified retention of the areas of Green Belt where appropriate and the release of Green Belt land where needed. However, at present the proposed Housing policies and Green Belt policies are not coherent and the reallocation of certain areas of Green Belt is not based on a credible evidence base.

Change to Plan

Appear at exam? Yes

Soundness Tests i, ii

Core Strategy Submission Document

S - 16107 - 14107 - Protection of the Green Belt, 6.9 - None

16107 Support

CHAPTER 6 Protection of the Green Belt, 6.9

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: Support, but express the following reservations:

The word "restrictive" should be removed and the Council should work more with landowners and the rural economy to support and promote more employment. This has been a growth area in recent years and could be better promoted to creating additional rural employment

Summary: Support, but express the following reservations:

The word "restrictive" should be removed and the Council should work more with landowners and the rural economy to support and promote more employment. This has been a growth area in recent years and could be better promoted to creating additional rural employment

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16377 - 8267 - Protection of the Green Belt, 6.9 - None

16377 Support

CHAPTER 6 Protection of the Green Belt, 6.9

Respondent: Aber Ltd [8267]

Aber Ltd
C/o Agent

Agent: Colliers CRE (Mr S Chapman) [8266]

Colliers CRE
9 Marylebone Lane
London
W1U 1HL
020 7344 6533

Full Text: Agree that the minimum amount of Green Belt is allocated to meet the District's housing need, and that the extensions to the residential envelope are in sustainable locations, and prevent the coalescence of settlements.

In addition, some Green Belt land is less worthy of continued protection, as it does not necessary contribute as strongly to the reasons for maintaining it as Green Belt.

It is interesting to note that whilst the Council will continue a restrictive policy towards employment growth in the Green Belt; this appears to contradict Policy ED4 that advises that certain locations will be released to accommodate new employment sites to compensate for the loss of locations in the existing settlements.

Summary: Agree that the minimum amount of Green Belt is allocated to meet the District's housing need, and that the extensions to the residential envelope are in sustainable locations, and prevent the coalescence of settlements.

In addition, some Green Belt land is less worthy of continued protection, as it does not necessary contribute as strongly to the reasons for maintaining it as Green Belt.

It is interesting to note that whilst the Council will continue a restrictive policy towards employment growth in the Green Belt; this appears to contradict Policy ED4 that advises that certain locations will be released to accommodate new employment sites to compensate for the loss of locations in the existing settlements.

Change to Plan N/A

Appear at exam? No **Soundness Tests** N/A

Core Strategy Submission Document

O - 15739 - 7446 - Policy GB1 - Green Belt Protection - iii

15739 Object

CHAPTER 6 Policy GB1 - Green Belt Protection

Respondent: Steven Abbott Associates North Quarry Office (Mr A Skelton) [7446] **Agent:** N/A

Steven Abbott Associates North Quarry Office
North Quarry Business Park
Appley Bridge
Wigan
Lancashire
WN6 9DB
01257 251177

Full Text: The policy needs to address that major developed sites will be identified and that the general policy in PPG2 will be applied to them

Summary: The policy needs to address that major developed sites will be identified and that the general policy in PPG2 will be applied to them

Change to Plan Additional text making reference to the identification of major developed sites in the Green Belt and how they will be dealt with in the light of PPG2 Annex C

Appear at exam? Yes **Soundness Tests** iii

Core Strategy Submission Document

O - 15855 - 14087 - Policy GB1 - Green Belt Protection - iii

15855 Object

CHAPTER 6 Policy GB1 - Green Belt Protection

Respondent: Mr Rowan Paterson [14087]

135 Downhall Park Way
Rayleigh
Essex
SS6 9TP
UK
07799647806

Agent: N/A

Full Text: I consider the DPD is unsound as the identity and character of rural Rawreth will be affected as it becomes simply an extension of Rayleigh and the additional traffic causes increased danger, pollution and damage to the fabric of the roads. Rawreth Lane cannot cope with the amount of traffic now at peak times, especially when it is being used to circumnavigate an accident elsewhere. We have already lost the Reid's Nursery site to housing and the Park School site to the development of ASDA and the new sports centre and further development cannot be sustained by the existing infrastructure.

Summary: I consider the DPD is unsound as the identity and character of rural Rawreth will be affected as it becomes simply an extension of Rayleigh and the additional traffic causes increased danger, pollution and damage to the fabric of the roads. Rawreth Lane cannot cope with the amount of traffic now at peak times, especially when it is being used to circumnavigate an accident elsewhere. We have already lost the Reid's Nursery site to housing and the Park School site to the development of ASDA and the new sports centre and further development cannot be sustained by the existing infrastructure.

Change to Plan I consider that the plan should be dropped.

Appear at exam? No **Soundness Tests** iii

Core Strategy Submission Document

O - 15935 - 14133 - Policy GB1 - Green Belt Protection - i, ii

15935 Object

CHAPTER 6 Policy GB1 - Green Belt Protection

Respondent: Mrs Angela Smith [14133]

Pear Tree Cottage
Church Road
Rawreth
WICKFORD
SS11 8SG
01268 733088

Agent: N/A

Full Text: Additional housing in Rawreth can be allocated on brown field sites within Rawreth. Extensive proposed housing on farmland should not be allowed. This is also totally out of scale with the village of Rawreth

Summary: Additional housing in Rawreth can be allocated on brown field sites within Rawreth. Extensive proposed housing on farmland should not be allowed. This is also totally out of scale with the village of Rawreth

Change to Plan Sites have been put forward within the centre of Rawreth on brown field sites. New housing should be on a scale that doesn't drastically alter the character of Rawreth. Sites within the village would not necessitate use of Rawreth Lane (already over used & congested) & are nearer Battlesbridge station. Small scale additional housing would be beneficial to Rawreth. A site where people can walk to the village hall and join in the social activities already existing should be considered.

Appear at exam? No

Soundness Tests i, ii

Core Strategy Submission Document

S - 15978 - 13441 - Policy GB1 - Green Belt Protection - None

15978 Support

CHAPTER 6 Policy GB1 - Green Belt Protection

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: There appears to be some overlap between both Green Belt policies. There may be an opportunity to combine both into one policy with clear explanatory text.

Summary: There appears to be some overlap between both Green Belt policies. There may be an opportunity to combine both into one policy with clear explanatory text.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16040 - 14107 - Policy GB1 - Green Belt Protection - None

16040 Support

CHAPTER 6 Policy GB1 - Green Belt Protection

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: The minimum amount of land should be allocated for development. Agree, rural diversification should be encouraged. The council should work more with landowners and the rural economy to promote and support more employment. This has been a growth area in recent years and could be better promoted contrary to the statement made on Page 66/para 6.9.
Only when every effort has been made to identify brown field sites for development should green belt land be released.

Summary: The minimum amount of land should be allocated for development. Agree, rural diversification should be encouraged. The council should work more with landowners and the rural economy to promote and support more employment. This has been a growth area in recent years and could be better promoted contrary to the statement made on Page 66/para 6.9.
Only when every effort has been made to identify brown field sites for development should green belt land be released.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16074 - 9599 - Policy GB1 - Green Belt Protection - iii

16074 Object

CHAPTER 6 Policy GB1 - Green Belt Protection

Respondent: Mrs Fiona Jury [9599]

WGDP Ltd
Cross Keys House
22 Queen Street
Salisbury
SP1 3EY

Agent: N/A

Full Text: The policy needs to be amended in order to provide guidance as to how existing brownfield sites within the Green Belt will be dealt with. There are opportunities for these types of sites in the District to be redeveloped for housing in sustainable locations, without encouraging the risk of coalescence of settlements.

Summary: The policy needs to be amended in order to provide guidance as to how existing brownfield sites within the Green Belt will be dealt with. There are opportunities for these types of sites in the District to be redeveloped for housing in sustainable locations, without encouraging the risk of coalescence of settlements.

Change to Plan The policy needs to be amended in line with PPG2 in order to provide policy guidance on the treatment of previously developed sites in the Green Belt in sustainable locations.

Appear at exam? Yes

Soundness Tests iii

Core Strategy Submission Document

O - 16138 - 10079 - Policy GB1 - Green Belt Protection - i

16138 Object

CHAPTER 6 Policy GB1 - Green Belt Protection

Respondent: Mrs E Graham [10079]
C/O Agent - Mr G Pyle

Agent: Mr G W Pyle [8549]
Wood Farm
Bulby
Near Bourne
Lincolnshire
PE10 0RU
08456 444 747

Full Text: A future release of a small area of green belt would not be harmful. The current policy is far too restrictive and precludes this from occurring regardless of potential possible future community benefits.
There is an area to the south of Rayleigh which no longer has a green belt function, where no coalescence would exist if development takes place plus several community benefits are possible such as school and permanent local resident access to a nearby public open space and woodland.

Summary: A future release of a small area of green belt would not be harmful. The current policy is far too restrictive and precludes this from occurring regardless of potential possible future community benefits.
There is an area to the south of Rayleigh which no longer has a green belt function, where no coalescence would exist if development takes place plus several community benefits are possible such as school and permanent local resident access to a nearby public open space and woodland.

Change to Plan The Council will allocate the minimum amount of green belt land necessary to meet the districts housing and employment needs. If necessary it will consider the release of small parcels of green belt where an exceptional community benefit is clearly demonstrated.

Appear at exam? Yes **Soundness Tests** i

Core Strategy Submission Document

O - 16153 - 9823 - Policy GB1 - Green Belt Protection - i

16153 Object

CHAPTER 6 Policy GB1 - Green Belt Protection

Respondent: mr alistir matthews [9823]

Agent: N/A

telfords farm
chelmsford road
battlesbridge
wickford
SS118TR
uk
01268732069

Full Text: Although the 5 purposes of the green belt are sound the interpretation by council is flawed in the case of land north of london road .This fulfills all the criteria but rochford council believe it should be developed before exploring alternatives put forward by landowners and Rawreth Parish Council .The land in question gives a wide vista and pleasing gateway to Rayleigh whilst being in the main highly productive . This may be the easy option but in the future food security will become a new global problem.You cannot grow food on concrete.

Summary: Although the 5 purposes of the green belt are sound the interpretation by council is flawed in the case of land north of london road .This fulfills all the criteria but rochford council believe it should be developed before exploring alternatives put forward by landowners and Rawreth Parish Council .The land in question gives a wide vista and pleasing gateway to Rayleigh whilst being in the main highly productive . This may be the easy option but in the future food security will become a new global problem.You cannot grow food on concrete.

Change to Plan There should be a set of new criteria when developing green belt ;In this order:
. Previously developed land adjoining settlement envelopes.
. Infilling within village boundaries.
. Plotland
. As a last resort Agricultural land starting with the lowest grade .

Appear at exam? No

Soundness Tests i

Core Strategy Submission Document

16171 Object

CHAPTER 6 Policy GB1 - Green Belt Protection

Respondent: The JTS Partnership on behalf of John Bishop
[14185]

The JTS Partnership on behalf of John Bishop
Number One, The Drive
Great Warley
Brentwood
Essex
CM13 3DJ
United Kingdom

Agent: Mr Sean Marten [9337]

The JTS Partnership LLP
Number One, The Drive
Great Warley
Brentwood
Essex
CM13 3DJ
United Kingdom
01277 224664

Full Text: Whilst the plan recognises that there is a need to protect the Green Belt in Rochford, it is also acknowledged that the Green Belt boundaries will need to be amended in order to provide the amount of housing required within the plan period. At this stage of the LDF of course, the re-definition of Green Belt boundaries is not undertaken; it is however important that the policy is drawn widely enough to permit a fair and open discussion of appropriate land releases at the next stage of the LDF.

We consider that policy GB1 provides sufficient scope for identifying land in Hockley for future development.

Summary: Observations and suggestions to policy GB1.

Change to Plan At this stage of the LDF of course, the re-definition of Green Belt boundaries is not undertaken; it is however important that the policy is drawn widely enough to permit a fair and open discussion of appropriate land releases at the next stage of the LDF.

Appear at exam? No **Soundness Tests** ii

Core Strategy Submission Document

S - 16202 - 9891 - Policy GB1 - Green Belt Protection - None

16202 Support

CHAPTER 6 Policy GB1 - Green Belt Protection

Respondent: Stolkin and Clements (Southend) LLP [9891]

Stolkin and Clements (Southend) LLP
Hawkley House
28 Chapel Street
Billericay
CM12 9LU

Agent: Firstplan (Ms K Matthews) [8501]

Firstplan
25 Floral Street
London
WC2E 9DS
020 7031 8210

Full Text: Policy GB1 is sound, in that the reallocation of green belt land to meet the District's housing and employment needs is justified because it is the most appropriate strategy when considered against reasonable alternatives.

Summary: Policy GB1 is sound, in that the reallocation of green belt land to meet the District's housing and employment needs is justified because it is the most appropriate strategy when considered against reasonable alternatives.

Additional evidence supplied, Council ref AE26

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16217 - 9935 - Policy GB1 - Green Belt Protection - i

16217 Object

CHAPTER 6 Policy GB1 - Green Belt Protection

Respondent: CPREssex (Mrs Valerie Stanton) [9935]

Agent: N/A

CPREssex
Hillcrest Farm
Lark Hil Road
Canewdon
SS4 3RZ
Essex

Full Text: This Policy is far too weak to protect the Green Belt within the Rochford District. There appears to have been no overall review of the Green Belt boundaries or any reasoning why specific areas have been chosen for development. Why are these areas less worthy of protection? Under GB1 Risk Mitigation (p140) it states that protection of the Green Belt will be 'regulated' through the 'development management process'. This is not the way to protect the Green Belt; a Policy that has been respected and successful in its functions (as set out in PPG2) for many years.

Summary: Policy GB1 is unsound as the principles of PPG2 have not been adhered to. An overall review of the Green Belt should have carried out and boundaries firmly drawn so they can be maintained.

CPREssex wishes to see the Policy wording revised to bring it into line with PPG2.

Change to Plan CPREssex wishes to see the Policy wording revised to bring it into line with PPG2.

Appear at exam? No

Soundness Tests i

Core Strategy Submission Document

S - 16219 - 9058 - Policy GB1 - Green Belt Protection - None

16219 Support

CHAPTER 6 Policy GB1 - Green Belt Protection

Respondent: C and S Associates [9058]

C and S Associates
Hawkley House
28 Chapel Street
Billericay
CM12 9LU

Agent: Firstplan (Ms K Matthews) [8501]

Firstplan
25 Floral Street
London
WC2E 9DS
020 7031 8210

Full Text: Draft Policy GB1 is sound, in that the reallocation of green belt land to meet the District's housing and employment needs is justified because it is the most appropriate strategy when considered against reasonable alternatives.

If you require any further information, please do not hesitate to contact me, and should you wish to discuss any aspect of the relevant issues, we will be pleased to assist.

Summary: Draft Policy GB1 is sound, in that the reallocation of green belt land to meet the District's housing and employment needs is justified because it is the most appropriate strategy when considered against reasonable alternatives.

If you require any further information, please do not hesitate to contact me, and should you wish to discuss any aspect of the relevant issues, we will be pleased to assist.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16221 - 8650 - Policy GB1 - Green Belt Protection - ii

16221 Object

CHAPTER 6 Policy GB1 - Green Belt Protection

Respondent: Countryside Properties (Southern) Ltd (Mr Steve Price) [8650] **Agent:** N/A

Countryside Properties (Southern) Ltd
Countryside House
The Drive
Brentwood
Essex
CM13 3AT
01277260000

Full Text: Unsound: (i) not effective; not flexible

Whilst we understand the desire to allocate the minimum amount of green belt land necessary to meet the council's needs, the council must allow for the possibility that identified brownfield sites may/will not come forward at the anticipated rate, or may not come forward at all, therefore that more green belt release is required than currently identified. Drawing green belt boundaries tightly around what are perceived to be the minimum developable areas required to provide for the housing numbers identified in policies H2 and H3 for example, may lead to the need to review those boundaries again in the future, possibly several times, if there was found to be inadequate land supply.

This would add further to the uncertainty regarding the permanence of the green belt or the extent of development at these sites, and would not be good long term strategic planning.

Whilst we understand that revised green belt boundaries (or development boundaries for the identified urban extensions) will be determined via the Site Allocation DPD, this principle of minimum green belt release must be balanced against the issue we raise here.

Furthermore, we can confirm that as far as we are concerned, development of 550 units or more units (see our other representations) at land North of London Road, Rayleigh, can be accommodated without any coalescence to neighbouring villages or towns. There is a substantial gap between this site and the nearest town, Wickford, to the west, and we are committed to providing a strategic gap between any development and Rawreth Village. There would be more significant issues of coalescence to other parts of Rayleigh if urban extensions were considered there e.g. affecting Hullbridge to the north, Hockley to the north east, Eastwood to the east/south east, and Thundersley etc to the south.

Summary: The wording of this policy to be revised (recommended wording)

We would suggest that there would be capacity on land north of London Road to accommodate further housing (other and above that identified in the Core Strategy) without causing coalescence to neighbouring settlements, and that an appropriate boundary be set to reflect this.

Change to Plan The wording of this policy to be revised to state something like "however, green belt boundaries will be defined to enable possible further housing provision to be made at identified urban extensions, to allow for the possibility that other (brownfield) housing sites fail to deliver as anticipated in the Core Strategy or that required levels of housing supply are not being met".

We would suggest that there would be capacity on land north of London Road to accommodate further housing (other and above that identified in the Core Strategy) without causing coalescence to neighbouring settlements, and that an appropriate boundary be set to reflect this.

Appear at exam? Yes **Soundness Tests** ii

Core Strategy Submission Document

O - 16230 - 9836 - Policy GB1 - Green Belt Protection - i, ii, iii

16230 Object

CHAPTER 6 Policy GB1 - Green Belt Protection

Respondent: mr Stephen Coombs [9836]

52 laburnum way
rayleigh
ss6 9gn
england
01268786860

Agent: N/A

Full Text: With regards to the proposed sites West of Rayleigh and Hullbridge,(which are actually in Rawreth) the plan is unsound and contrary to Policy GB1 and guidance under the East of England Plan in that these are almost entirely on greenbelt farmland when brownfield sites are available.

Summary: With regards to the proposed sites West of Rayleigh and Hullbridge,(which are actually in Rawreth) the plan is unsound and contrary to Policy GB1 and guidance under the East of England Plan in that these are almost entirely on greenbelt farmland when brownfield sites are available.

Change to Plan Revise plans to favour brownfield and previously developed land.

Appear at exam? No

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 16253 - 9177 - Policy GB1 - Green Belt Protection - i

16253 Object

CHAPTER 6 Policy GB1 - Green Belt Protection

Respondent: Colonnade Land LLP [9177]

Colonnade Land LLP
Fifth Floor
17-19 Maddox Street
London
W15 2QH
020 7255 7490

Agent: Icen Projects Limited (David Churchill) [10057]

Icen Projects Limited
83 Victoria Street
London
SJ1H 0HW

Full Text: ROCHFORD DISTRICT COUNCIL - LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY SUBMISSION
SEPTEMBER 2009

Icen Projects Ltd (Icen) has been instructed by Colonnade Land LLP (Colonnade) to submit representations to the Rochford Local Development Framework Core Strategy Submission (CSS).

a) Overview

It is our conclusion that the CSS is not justified, effective or consistent with national policy, as required by Planning Policy Statement 12: Creating Strong Safe and Prosperous Communities through Local Spatial Planning (PPS12) and is therefore vulnerable to being found unsound by an Inspector through the Examination in Public.

b) Background and Summary

These representations follow those made by Icen on behalf of Colonnade to the Preferred Options Core Strategy, submitted via letter dated 17 December 2008. In this regard, we would request that the Council confirms that the representations made to the Preferred Options Core Strategy will be taken into account alongside the current representations, particularly as there are a number of cross references between the two sets of representations.

It is not considered necessary to reiterate the content of the previous representations, as they were made at the appropriate stage and will be considered by the Planning Inspectorate in due course, but it is inevitable that certain elements will require restating where it is not clear that they have been taken into account in the production of the CSS. For clarity, therefore, Colonnade feel that it is appropriate to clarify the 'in-principle' issues that were raised in the representations to the Preferred Options Core Strategy, recognising that these issues were raised in the context of a wider and more coherent justification made within the representations:

- â€¢ Further cross-referencing of the recommendations made within the evidence base is required;
- â€¢ Greater focus should be placed on promoting Rochford as the principal settlement within the District;
- â€¢ Coombes Farm is the most logical location for residential development abutting the urban area of Rochford and as such warrants recognition as a general location for residential development;
- â€¢ The allocation of Three Ashes Farm for employment generating uses will be pursued;
- â€¢ Recognition that it is not realistic to expect residential allocations to be met mainly on Brownfield sites, nor should the intensification of smaller sites in residential areas be pursued;
- â€¢ Many of the sites identified as suitable for residential development will not be viable and will not come forward for development within the timescales anticipated;
- â€¢ The failure to provide the necessary justification for the proposed infrastructure improvements sought in Appendix H1;
- â€¢ The inclusion of an affordable housing exception policy was sought; and
- â€¢ The need to identify sites capable of delivering employment growth in the short term.

Following assessment of the CSS presented by the Council for consultation prior to submission to the Secretary of State, Colonnade considers the Plan to be 'unsound' as the document consistently fails to meet the tests of soundness set out in the table following Paragraph 4.52 of PPS12. For clarity, PPS12 confirms that to be 'sound' a Core Strategy should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY and defines 'justified' as "founded on a robust and credible evidence base" and "the most appropriate strategy when considered against the reasonable alternatives" and 'effective' as "deliverable", "flexible" and "able to be monitored".

The rationale for the above is identified in the remainder of these representations, which are provided in the interests of ensuring the Council delivers a strong, robust and logical Core Strategy that guides the future development of the District in a justified and effective manner.

b) Colonnade

As the Council is aware from previous submissions to the Local Development Framework, Colonnade is a strategic land company with a particular interest in the future development of the District as a consequence of a number of sites that it controls, particularly around Rochford.

The Council will also be aware that Colonnade has recently submitted an outline planning application for the residential development of the land at Coombes Farm, Rochford to provide a sustainable urban extension comprising up to 326

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CHAPTER 6 Policy GB1 - Green Belt Protection

residential dwellings, with associated accesses and community uses. Whilst the planning application process is clearly separate from the Local Development Framework production process, Colonnade wishes to continue the promotion of the site as a suitable location for residential development.

Accordingly, these representations focus on the legal requirements and tests of soundness associated principally with the Housing and Employment chapters of the CSS, with reference where appropriate to the sites that are controlled by Colonnade, the outline planning application at Coombes Farm and other issues where relevant.

c) Housing

i. Date of Adoption

The CSS assumes an adoption date of 2010 and plans for the provision of housing to 2025.

Taking account of the potential delays to the adoption of the Plan, including the Examination process, it would be more appropriate for the CSS to provide sufficient flexibility to allow for delays in its adoption. Colonnade considers an adoption date of 2011 for the CSS is a more realistic target.

Taking account of the advice in Paragraph 4.13 of PPS12, which states that the time horizon for the Core Strategy should be "at least 15 years from the date of adoption" it would be appropriate for the CSS to plan for the provision of housing to 2026 at the earliest. As such, Colonnade does not consider the CSS to be 'flexible' in the context of the tests of soundness in the table following Paragraph 4.52 of PPS12.

ii. Housing Delivery

However, setting the above aside, the Housing Chapter identifies the minimum housing delivery target for the period 2001 to 2021 of 4,600 dwellings as set out in the East of England Plan, with the annual average requirement of 250 dwellings per annum to extend provision from 2021 to 2025. It also confirms that the residual target for the period 2006 to 2021 is 3,790 dwellings, taking account of the delivery of 810 dwellings in the period 2001 to 2006, and a further 618 dwellings have been completed between 2006 and 2008.

This leaves a residual housing provision target of a minimum of 3,172 dwellings in the period 2008 to 2021. Taking into account the required provision beyond 2021, the residual housing provision target in the period 2008 to 2025 is a minimum of 4,172 dwellings. The disparity between these figures and those provided within the CSS are explained by the rounding down of the annual average delivery requirement in the period 2006 to 2021 to 250 dwellings per annum, compared with the actual figure of 252.67.

The table at Paragraph 4.6 of the CSS identifies the source of housing provision that will meet the identified minimum requirements and includes figures for 'Extant Planning Permissions' and 'Existing allocations/other appropriate sites identified in Strategic Housing Land Availability Assessment'. These figures, along with the actual completions within the period are combined to produce the figure for the 'Total without Green Belt release' figure.

Setting aside the concern regarding under-provision associated with the rounding down of the annual average delivery requirement in the period 2006 to 2021, the CSS fails to identify the sites that will contribute to the 'Extant Planning Permissions' provision. The identification of the sites that will contribute to the 'Extant Planning Permissions' should be provided in the context of the findings of the Inspector in the appeal by Asprey Homes [APP/G5180/A/07/2043219/NWF] who determined that the reliance on a delivery rate of 100% is unsafe [IR287].

Furthermore, at the time of writing these representations, the Strategic Housing Land Availability Assessment 2009 has not been published. It is impossible therefore for a full assessment of the proposed housing provision to be undertaken to confirm whether the CSS is 'founded on a robust and credible evidence base' [test of soundness in the table following Paragraph 4.52 of PPS12].

iii. Redevelopment of Employment Sites

Paragraph 4.14 of the CSS refers to the identification of the four employment sites that are considered by the Council to be suitable for redevelopment to residential use. However, the failure to publish the Strategic Housing Land Availability Assessment 2009 either before or alongside the publication of the CSS means that the assumptions made by the Council as to the suitability, availability, viability and deliverability of the sites cannot be assessed.

It has been necessary, therefore, to review the assumptions made in the Rochford Urban Capacity Study 2007 (UCS) regarding the sites. Within the section of the UCS entitled 'Redevelopment of Established Employment Land' [pages 22 & 23] includes a list of those sites assessed, their indicative capacities and the probability of residential development coming forward at the sites within the plan period (identified elsewhere as 2001 - 2021). The list includes the four sites identified in the CSS of Eldon Way/Foundry Estate, Hockley; Rawreth Lane Industrial Estate, Rayleigh; Stambridge Mills; and Star Lane Industrial Estate, Great Wakering.

In total, the UCS identifies an indicative residential redevelopment capacity of 486 units on the four sites (118, 220, 60 and 88 respectively). Of these, it identifies the Rawreth Lane Industrial Estate and Stambridge Mills as having a 'high'

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probability of coming forward for development in the Plan period (2001 - 2021), which would deliver 280 residential dwellings using the Council's own figures. The Star Lane Industrial Estate (referred to in the UCS as the Star Lane Brickworks) is identified as having a 'medium' probability of coming forward for development in the Plan period, with capacity to deliver 88 residential dwellings. It is unclear, therefore, where the figure for 'Existing allocations/other appropriate sites identified in Strategic Housing Land Availability Assessment'.

Set against this is the identification of these four sites in the CSS as being capable of delivery for residential development within the Plan period, with 671 units delivered between 2006 and 2015 and a further 506 units between 2015 and 2021.

The UCS also states in the same section that:

"There are considerable areas of land in the district that are currently allocated for, and in use as, employment land. The redevelopment of such sites for residential use would reduce demand for residential development on greenfield sites, but would at the same time create a need for alternative sites to be found for employment. Such an approach, which would be likely to require the decontamination of existing employment land to make it fit for residential use, together with development of a greenfield site and implementation of additional infrastructure to serve the new employment area, may well be unsustainable." [our emphasis]

The UCS appears to confirm therefore, that not only would the redevelopment of the four sites listed in the CSS be unlikely within the Plan period, but also potentially unsustainable. In this regard, it is notable that the promoters of Stambridge Mills sought the Screening Opinion of the Council as to whether Environmental Impact Assessment of the planning application for the redevelopment of the site for residential use was required in 2007, but to date are yet to submit a planning application for the redevelopment of the site.

In light of this, Colonnade does not consider the CSS is 'the most appropriate strategy when considered against the reasonable alternatives' [test of soundness in the table following Paragraph 4.52 of PPS12], which include the provision of residential development in East Rochford.

iv. Strategic Housing Growth to the East of Rochford

Furthermore, whilst paragraph 2.62 of the CSS identifies concern relating to the identification of locations to the east of Rochford for development on the basis that 'vehicular movements would inevitably be directed through Rochford's historic core', the CSS later identifies Stambridge Mills as a suitable site for residential redevelopment.

In light of the evident conflicts between the evidence base provided in support of the CSS and the absence of other evidence, the CSS is not considered 'sound' in the context of the tests of soundness in the table following Paragraph 4.52 of PPS12.

v. Housing Trajectory

Paragraph 4.28 of the CSS confirms that policies H1, H2 and H3 of the CSS will deliver housing supply as illustrated in the Housing Trajectory at Appendix H2. This Housing Trajectory is transposed from the 2008 Annual Monitoring Report (AMR).

Whilst on the face of it, the Housing Trajectory appears to confirm that the Council can meet its requirement to identify a five year housing supply, many of the sites identified within the AMR do not conform to the guidance issued by CLG in August 2008, on the assessment of a five year land supply. The guidance identifies sites that can be included within the five year assessment of housing supply as:

"those that are allocated for housing in the Development Plan, sites that have planning permission (outline or full planning permission that has not been implemented) and specific, unallocated brownfield sites that have the potential to make a significant contribution to housing delivery during the 5 year period".

Table 4.10: Projected Net Completions of the AMR confirms that the five year housing land supply figure includes sites from 'other land allocated for residential purposes', which are based on land allocations outside existing settlements. However, it should be clarified that these land allocations are not currently allocated for housing development in an adopted Development Plan. As such, these unallocated greenfield sites that are yet to make significant progress through the planning system should be discounted and the five year housing land supply recalculated.

The table below has been prepared to confirm the extent of the shortfall should the sites from 'other land allocated for residential purposes' be removed from the calculation of the Rochford five year housing land supply, in accordance with the guidance issued by CLG:

Recalculated Five Year Housing Land Supply (2009 - 2014):

Year
1st April 2009 to 31st March 2010
Predicted Delivery (A)

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106 dwellings
Allocations on 'other land allocated for residential purposes' (B)
0
Residual delivery (A-B)
106 dwellings
Delivery Shortfall
0

Year
1st April 2010 to 31st March 2011
Predicted Delivery (A)
217 dwellings
Allocations on 'other land allocated for residential purposes' (B)
150
Residual delivery (A-B)
67 dwellings
Delivery Shortfall
150

Year
1st April 2011 to 31st March 2012
Predicted Delivery (A)
544 dwellings
Allocations on 'other land allocated for residential purposes' (B)
300
Residual delivery (A-B)
244 dwellings
Delivery Shortfall
300

Year
1st April 2012 to 31st March 2013
Predicted Delivery (A)
395 dwellings
Allocations on 'other land allocated for residential purposes' (B)
375
Residual delivery (A-B)
20 dwellings
Delivery Shortfall
375

Year
1st April 2013 to 31st March 2014
Predicted Delivery (A)
300 dwellings
Allocations on 'other land allocated for residential purposes' (B)
300
Residual delivery (A-B)
0 dwellings
Delivery Shortfall
300

TOTAL

Predicted Delivery (A)
1,562 dwellings

Allocations on 'other land allocated for residential purposes' (B)
1,125 dwellings

Residual delivery (A-B)
437 dwellings

Delivery Shortfall
1,125 dwellings

The above table confirms that the removal of the 'other land allocated for residential purposes' from the calculation of the Rochford five year housing land supply leaves the Council with a minimum net additional housing delivery of 437 dwellings, which equates to a supply of 1.7 years based on the adjusted annual delivery target of a minimum of 255 net

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additional dwellings per annum. As such, the Council is failing to meet its requirement to demonstrate a five year housing land supply in accordance with PPS3 and the supporting guidance provided by CLG. It is notable that the recent application by David Wilson Homes at Land between Main Road and Rectory Road and Clements Hall Way, Hawkwell identifies an even greater shortfall in the Council's five year housing land supply.

In addition to the above, the AMR does not include a commentary on how deliverability has been assessed against the requirements of paragraph 54 of PPS3.

Furthermore, the guidance from CLG confirms that the windfall sites cannot be relied upon in demonstrating a five year supply unless a Local Planning Authority can demonstrate genuine local circumstances exist to allow this exception. However, the second paragraph of the section entitled 'Housing Trajectory and Five Year Housing Supply' confirms that the estimated completions in the years 2008 to 2013 includes estimated yields through 'intensification' coming forward in future years. With reference to the definition of 'intensification' on page 13 of the AMR, it appears that the 'Housing Trajectory and Five Year Housing Supply' also includes provision for windfall sites. As such, the Council is required to demonstrate the 'genuine local circumstances exist to allow this exception'.

The pressures on delivery and need for additional sites are more acute when it is considered that an average delivery rate of 204 dwellings per annum was achieved during a strong period of housing market growth. In view of the current economic downturn, and significant problems faced within the housing market, the Council should seek to identify appropriate and deliverable sites to meet its regional housing target provision commitments. Suitable sites would include Coombes Farm, which has been positively promoted for development through the LDF process.

It may, therefore, be more appropriate for the Council not merely to allocate sufficient sites to meet the minimum targets set down by the East of England Plan, but to identify a reservoir of land capable of coming forward for development should the sites identified through the CSS and Allocations Development Plan Documents (DPD) fail to come forward for development within the anticipated timescales.

vi. Appendix H1

As set out in the representations to the Preferred Options Core Strategy, there is continuing concern that the list of improvements to infrastructure required in support of residential development as set out in Appendix H1 fails to provide the necessary justification for its inclusion. Whilst the preamble seeks to clarify why the infrastructure is sought, the inclusion of this list should be fully justified, otherwise it is of little value. Furthermore, it would be of benefit to provide further details of the existing community infrastructure provision and capacity within the evidence base.

The failure to provide the necessary justification for its inclusion means that the CSS will not be 'founded on a robust and credible evidence base' [test of soundness in the table following Paragraph 4.52 of PPS12].

d) Character of Place

As set out in the representations to the Preferred Options Core Strategy, Colonnade considers that, with respect to the requirement to produce and adhere to Development Briefs for large residential developments, as set out in Policy CP1, the Council should not seek to impose further demands on developers where existing regulations provide sufficient requirements regarding design. In this instance, Design and Access Statements provide sufficient design guidelines for developments and there is no additional information provided in the policy or supporting text that clearly sets out the justification for this requirement.

e) Green Belt

With reference to the comments regarding the redevelopment of employment sites under the 'Housing' section above and the requirement to allocate sufficient land to meet the minimum housing provision targets as required by the East of England Plan, Colonnade considers that the chapter on Green Belt, and policy GB1 in particular, fails to provide the necessary evidence base that will allow it to be monitored effectively.

It is inherent that the proposed redevelopment of previously developed employment sites for residential use in order to reduce the requirement to allocate previously undeveloped land for residential use will displace these employment uses. In turn, therefore, the separate allocation of previously undeveloped Green Belt to accommodate the compensatory employment provision is required. This is accepted in principle at paragraph 11.11 of the CSS.

Without providing clarification of the anticipated quantum of land required to accommodate the provision of housing and compensatory and new employment land, it is not possible to monitor the performance of policy GB1.

However, using the Council's figures in the table setting out the breakdown of the housing provision figures in Chapter 4 of the CSS (assuming that actual completions and extant permissions are all on previously developed land), setting aside the displacement of employment uses referred to above, approximately 42% of the required minimum housing provision target is capable of being accommodated on previously developed land (2,005 units from a total of 4,750). As such, the Council is required to provide at least 58% of the required minimum housing provision target on the Green Belt (2,745 units from a total of 4,750).

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CHAPTER 6 Policy GB1 - Green Belt Protection

If these figures are adjusted to take account of the displacement of employment uses (assuming the provision of an equal quantity of land is required to compensate for the employment land that is redeveloped), this figure changes to 17.5% on previously developed land and 82.5% on Green Belt (828 and 3,922 units from a total of 4,750 respectively). Even allowing for the achievement of higher densities of employment on new developments, the figures above are unlikely to change significantly.

Furthermore, the table in Chapter 4 also confirms that no previously developed land will be available for development beyond 2021, or 2015 if account is taken of the displacement of the employment uses.

In light of this, not only does Chapter 6 fail to provide the necessary evidence base that will allow it to be monitored effectively, it is also necessary to consider whether it presents the most appropriate strategy for addressing the required release of Green Belt land to accommodate the defined housing and employment delivery targets to 2025 and beyond as necessary. Colonnade considers a more robust approach that is flexible and capable of being monitored, would be to clearly identify those sites capable of delivery in the short term, which for the avoidance of doubt includes those sites being promoted by Colonnade, with a reservoir of alternative sites set aside for future growth.

As set out in the representations to the Preferred Options Core Strategy, Colonnade considers that the inclusion of an affordable housing exception policy within the CSS will aid the delivery of community housing within rural areas. However, the CSS does not contain such a policy, or adequately address the issue of community housing within rural areas and the CSS is not considered to provide sufficient flexibility to allow for the delivery of essential rural housing.

f) Environmental Issues

Colonnade has concerns regarding the justification for and effectiveness of a number of the policies contained within the Environmental Issues chapter, as follows:

â€¢ Policy ENV1: The Council fails to identify how it will "maintain, restore and enhance" the sites of nature conservation importance that are identified, or how the performance of this policy will be monitored;

â€¢ Policy ENV3: In the context of the advice at paragraph 4.32 of PPS12 regarding the reformulation of national policies, Colonnade does not consider that this policy is required; and

â€¢ Policy ENV9: As set out in the representations to the Preferred Options Core Strategy, Colonnade does not consider that the necessary evidence base has been provided to justify a policy that seeks to go above and beyond the policy targets for the Code for Sustainable Homes as set out by Central Government.

g) Community Infrastructure, Leisure and Tourism

Policy CLT1 refers to the requirement for residential and employment development to contribute to the infrastructure identified in Appendix CLT1 through Standard Charges.

However, whilst the general principle of securing planning obligations through the application of standard charges is broadly accepted, the list of infrastructure requirements set out in Appendix CLT1 is not supported by sufficient evidence base to identify its robustness and credibility. As such, Colonnade does not consider either policy CLT1 or Appendix CLT1 is justified in the context of PPS12.

It is also noted that, despite the clarification sought by Colonnade at the Core Strategy Preferred Options stage, the CSS fails to confirm what information should be contained within Health Impact Assessments, which are required by policy CLT4. Once again, Colonnade requests further clarification of what is involved in the assessment and the expected outputs, which will provide greater clarity and will allow the policy to be monitored.

h) Transport

Policy T8 confirms that the Council will apply minimum parking standards. As set out in the representations to the Preferred Options Core Strategy, the guidance in Planning Policy Guidance Note 13: Transport (PPG13) is clear regarding the imposition of parking standards.

Paragraphs 52-56 of PPG13 confirm that the Local Planning Authorities should apply maximum not minimum parking standards. In order to satisfy the legal requirements set out in PPS12, the policy must reflect PPG13 to promote sustainable transport choices and further provide incentives for developers to locate further residential land closer to local service centres by requiring maximum parking standards for residential developments.

i) Economic Development

As set out in the representations to the Preferred Options Core Strategy, the land at Three Ashes Farm provides an excellent opportunity to deliver employment growth in the short term and may be a suitable site for the 'Eco-Innovation Centre' that is being promoted by the Council. Its identification as a suitable location for strategic employment growth, or the provision of an Eco-Innovation Centre, would accord with the general principles of the policies contained within Chapter 11.

16253 Object

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The identification of Purdeys Industrial Estate as fit for purpose (in paragraph 11.32 and the Council's 2008 Employment Land Study 2008) and therefore it should be maintained and if possible expanded, is welcomed and Colonnade considers that Three Ashes Farm could deliver this expansion, providing a natural extension to Purdeys Industrial Estate and being strategically located close to the Airport.

Three Ashes would address the negative impacts that the nearby residential area experiences from the existing Industrial Estate by providing a buffer between established uses and the residential area with less intensive employment activities. The highways analysis that has been carried out has suggested that it would not have an adverse impact on roads and congestion. Furthermore, there are very few opportunities for businesses to expand and Three Ashes could provide this opportunity.

j) Conclusions

Following the submission of representations to the Preferred Options Core Strategy, Colonnade is disappointed to note that the CSS fails to take account of the majority of the issues raised in their representations.

In addition, Colonnade considers the plan to be 'unsound' as the document consistently fails to meet the tests of soundness set out in the table following Paragraph 4.52 of PPS12 and respectfully requests that the Council notifies Icen, on behalf of Colonnade, of the future arrangements for the Examination of the Core Strategy. Furthermore, Colonnade wishes to take this opportunity to formally register a request to appear at all stages of the Examination in Public, including the pre-hearing meeting and any planned hearing sessions whereby issues raised in the context of this letter are to be discussed. Please confirm this request, and that the representations made to the Preferred Options Core Strategy will be taken into account alongside the current representations, by way of return to this letter.

Icen Projects, on behalf of Colonnade Land LLP trusts that the Council will find these representations to be constructive and helpful in taking forward the Core Strategy. Should you wish to discuss any aspect of these representations further, please do not hesitate to contact us.

Summary:

e) Green Belt

With reference to the comments regarding the redevelopment of employment sites under the 'Housing' section above and the requirement to allocate sufficient land to meet the minimum housing provision targets as required by the East of England Plan, Colonnade considers that the chapter on Green Belt, and policy GB1 in particular, fails to provide the necessary evidence base that will allow it to be monitored effectively.

It is inherent that the proposed redevelopment of previously developed employment sites for residential use in order to reduce the requirement to allocate previously undeveloped land for residential use will displace these employment uses. In turn, therefore, the separate allocation of previously undeveloped Green Belt to accommodate the compensatory employment provision is required. This is accepted in principle at paragraph 11.11 of the CSS.

Without providing clarification of the anticipated quantum of land required to accommodate the provision of housing and compensatory and new employment land, it is not possible to monitor the performance of policy GB1.

However, using the Council's figures in the table setting out the breakdown of the housing provision figures in Chapter 4 of the CSS (assuming that actual completions and extant permissions are all on previously developed land), setting aside the displacement of employment uses referred to above, approximately 42% of the required minimum housing provision target is capable of being accommodated on previously developed land (2,005 units from a total of 4,750). As such, the Council is required to provide at least 58% of the required minimum housing provision target on the Green Belt (2,745 units from a total of 4,750).

If these figures are adjusted to take account of the displacement of employment uses (assuming the provision of an equal quantity of land is required to compensate for the employment land that is redeveloped), this figure changes to 17.5% on previously developed land and 82.5% on Green Belt (828 and 3,922 units from a total of 4,750 respectively). Even allowing for the achievement of higher densities of employment on new developments, the figures above are unlikely to change significantly.

Furthermore, the table in Chapter 4 also confirms that no previously developed land will be available for development beyond 2021, or 2015 if account is taken of the displacement of the employment uses.

In light of this, not only does Chapter 6 fail to provide the necessary evidence base that will allow it to be monitored effectively, it is also necessary to consider whether it presents the most appropriate strategy for addressing the required release of Green Belt land to accommodate the defined housing and employment delivery targets to 2025 and beyond as necessary. Colonnade considers a more robust approach that is flexible and capable of being monitored, would be to clearly identify those sites capable of delivery in the short term, which for the avoidance of doubt includes those sites being promoted by Colonnade, with a reservoir of alternative sites set aside for future growth.

As set out in the representations to the Preferred Options Core Strategy, Colonnade considers that the inclusion of an affordable housing exception policy within the CSS will aid the delivery of community housing within rural areas. However, the CSS does not contain such a policy, or adequately address the issue of community housing within rural areas and the CSS is not considered to provide sufficient flexibility to allow for the delivery of essential rural housing.

Core Strategy Submission Document

O - 16253 - 9177 - Policy GB1 - Green Belt Protection - i

16253 Object

CHAPTER 6 Policy GB1 - Green Belt Protection

Change to Plan

Appear at exam? Yes Soundness Tests i

Core Strategy Submission Document

S - 16378 - 8267 - Policy GB1 - Green Belt Protection - None

16378 Support

CHAPTER 6 Policy GB1 - Green Belt Protection

Respondent: Aber Ltd [8267]

Aber Ltd
C/o Agent

Agent: Colliers CRE (Mr S Chapman) [8266]

Colliers CRE
9 Marylebone Lane
London
W1U 1HL
020 7344 6533

Full Text: The need to maintain buffers to prevent the coalescence of individual settlements is supported.

Summary: The need to maintain buffers to prevent the coalescence of individual settlements is supported.

Change to Plan N/A

Appear at exam? No **Soundness Tests** N/A

Core Strategy Submission Document

O - 16726 - 14244 - Policy GB1 - Green Belt Protection - i, ii

16726 Object

CHAPTER 6 Policy GB1 - Green Belt Protection

Respondent: Highways Agency (Mr C Shaw) [14244]

Highways Agency
2nd Floor
Woodlands
Manton Lane
Bedford
MK41 7LW
01234 796122

Agent: N/A

Full Text:

Thank you for inviting the Highways Agency (HA) to comment on the Rochford Core Strategy (CS) Submission Document and Rochford Area Action plan (AAP) prepared by Rochford District Council

As you are aware the HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's motorway and all-purpose trunk road network, collectively known as the Strategic Road Network (SRN), on behalf of the Secretary of State for Transport.

In spatial planning and development control terms, we have a duty to safeguard the operation of the motorway and trunk road network as set out in the Department for Transport Circular: 02/2007: Planning and the Strategic Road Network. <http://www.dft.gov.uk/pgr/regional/strategy/policy/circular207planningandstrategic>. The circular encourages the HA to work co-operatively with Local Planning Authorities within the framework of the Government's policies for planning, growth areas, regeneration, integrated transport and sustainability. We look to your Council's Local Development Framework to promote strategies, policies and land allocations which would support alternatives to the private car.

In the case of Rochford there are no trunk roads within the District although there are two strategic corridors namely the A13 and A127/A1159 which connect into the M25 motorway network at Junctions 30 and 29 respectively. Sections of these areas are currently heavily congested, particularly during peak periods, and operate under considerable levels of network stress. Therefore it is important to the HA that the impact of major development proposals in the Rochford area is considered within the context of future impact on the M25 and the A13 Trunk Road.

Please see below some general comments regarding the soundness of the CS and SSA from a transport perspective, referring to specific proposed submission policies as necessary. This response has been completed with reference to paragraph 4.52 of PPS12 (2008) PPS12, paragraph 4.52 - To be 'sound' a core strategy should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY.

CORE STRATEGY

Policy GB1 - Green Belt Protection

The HA acknowledges that only the minimum amount of Green Belt land will be allocated to meet the District's housing and employment needs as necessary. However, the HA is concerned that any proposed redevelopment of greenbelt sites could result in development in areas with limited access to sustainable transport modes therefore resulting in higher levels of car usage and subsequent impact on the SRN. Although the HA recognizes that new public transport hubs that would facilitate the use of non-car modes could be developed over time, this process is likely to require very substantial investment.

It is therefore important that an appropriate assessment of infrastructure requirements is performed for development sites on Green Belt land. Funding towards the necessary public transport infrastructure improvements must be sought and secured prior to occupation of any new development on greenbelt land. Furthermore, the occupation of such developments should be phased in line with necessary transport infrastructure. This will help the CS meet the PPS12 requirement that a sound DPD should be 'justified' and 'effective' and hence deliverable.

Policy T1 - Highways

Policy T1 highlights the need to reduce reliance on the private car but also observes that 'some impact on the highway network is inevitable'. In a District with such high levels of private car ownership and a limited public transport network, as stated in paragraph 10.2, it will be important to assess the potential impacts to the highway network and ensure that mitigation measures are proposed and implemented where necessary.

An emphasis should be placed on the provision and improvement of sustainable transport infrastructure, particularly where high trip-generating developments such as offices are proposed. In line with the DfT's Guidance on Transport Assessment (2007) - DfT GTA, paragraph 4.51 - 'The key issue is the need to ensure that development proposals strive to achieve nil detriment ('no worse off') to the strategic network, for the opening year and appropriate horizon year'. This emphasis will assist in mitigating potential increases in private vehicle trips and hence help ensure that there is a nil-detriment effect on the SRN.

Policy T3 - Public Transport

Core Strategy Submission Document

O - 16726 - 14244 - Policy GB1 - Green Belt Protection - i, ii

16726 Object

CHAPTER 6 Policy GB1 - Green Belt Protection

The recent Planning Inspectorate 'LDF - Learning from Experience' document (September 2009) suggests that a Core Strategy should identify a clear source of funding for infrastructure for at least the first 5 years of the plan - The Planning Inspectorate, LDF: Examining DPDs: Learning from experience, September 2009, Paragraph 22 - 'For at least the first 5 years of the plan it should be clear what infrastructure is required, who is going to fund and provide it and how it is to relate to the rate of development'.. Paragraph 10.15 of the CS highlights the importance of public transport links for new developments and implies that developers may be required to contribute towards public transport provision. However, it is noted that developer contributions cannot be expected to pay for all transport improvements and as such, in line with the recent Planning Inspectorate document outlined above additional sources of funding should be identified. It is recommended that alternative sources of funding for public transport improvements are clearly outlined within the CS to ensure that adequate infrastructure provision is made.

Policy T4 - South Essex Rapid Transit

As mentioned in our response to the Core Strategy Issues and options consultation the HA is supportive of this policy and the need to progress the route through South Essex. This has the potential to reduce the impact on the SRN (A13).

Policy T5 - Travel Plans

The HA welcomes the requirement for a travel plan for developments involving both destination and origin trips. However it is noted that no threshold for employment sites have been specified. Essex County Council requires the production of a workplace travel plan for developments with over 50 employees or where there will be a significant impact on the local road network. To avoid ambiguity for developers, the HA recommends that the Rochford District Core Strategy specifies a similar threshold within Policy T5. This will ensure the Core Strategy is in line with PPG13 paragraph 87 - PPG13 - 'Local authorities are expected to consider setting local targets for the adoption of travel plans by local businesses and other organizations..'

Policy ED2 - London Southend Airport

The HA previously responded to the London Southend and Environs Joint Area Action Plan Preferred Options Document (March 2009). As such, we have not repeated our comments here but instead refer you to our consultation response dated 31 March 2009.

Summary:

Policy GB1 - Green Belt Protection

The HA acknowledges that only the minimum amount of Green Belt land will be allocated to meet the District's housing and employment needs as necessary. However, the HA is concerned that any proposed redevelopment of greenbelt sites could result in development in areas with limited access to sustainable transport modes therefore resulting in higher levels of car usage and subsequent impact on the SRN. Although the HA recognizes that new public transport hubs that would facilitate the use of non-car modes could be developed over time, this process is likely to require very substantial investment.

It is therefore important that an appropriate assessment of infrastructure requirements is performed for development sites on Green Belt land. Funding towards the necessary public transport infrastructure improvements must be sought and secured prior to occupation of any new development on greenbelt land. Furthermore, the occupation of such developments should be phased in line with necessary transport infrastructure. This will help the CS meet the PPS12 requirement that a sound DPD should be 'justified' and 'effective' and hence deliverable.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i, ii

Core Strategy Submission Document

O - 16827 - 8075 - Policy GB1 - Green Belt Protection - i, ii

16827 Object

CHAPTER 6 Policy GB1 - Green Belt Protection

Respondent: Mr Dudley Ball [8075]

Westview
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Essex

SS5 4SS

Agent: Edward Gittins & Associates (Mr Edward Gittins) [8074]

Edward Gittins & Associates
The Mount
Huxtables Lane
Fordham Heath
Colchester
Essex

CO3 9TJ

01206 240321

Full Text:

See attached representations

Council ref AE20

Summary:

See attached representations

Council ref AE20

Change to Plan

See attached representations

Council ref AE20

Appear at exam? Yes

Soundness Tests i, ii

Core Strategy Submission Document

O - 16829 - 8076 - Policy GB1 - Green Belt Protection - i, ii

16829 Object

CHAPTER 6 Policy GB1 - Green Belt Protection

Respondent: Crowstone Properties Ltd. [8076]

Crowstone Properties Ltd.
c/o The Agent

CO3 9TJ

Agent: Edward Gittins & Associates (Mr Edward Gittins) [8074]

Edward Gittins & Associates
The Mount
Huxtables Lane
Fordham Heath
Colchester
Essex

CO3 9TJ

01206 240321

Full Text:

See attached representations

Council ref AE21

Summary:

See attached representations

Council ref AE21

Change to Plan

See attached representations

Council ref AE21

Appear at exam? Yes

Soundness Tests i, ii

Core Strategy Submission Document

S - 16880 - 8329 - Policy GB1 - Green Belt Protection - None

16880 Support

CHAPTER 6 Policy GB1 - Green Belt Protection

Respondent: Swan Hill Homes Limited [8329]

Swan Hill Homes Limited
C/O Agent
Mr P Kneen
Charles Planning

Agent: Charles Planning Associates Ltd (Mr P Kneen) [5040]

Charles Planning Associates Ltd
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Solent Business Park
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PO15 7AH
01489 580853

Full Text:

1.0 Instruction and Introduction

1.1 Charles Planning Associates Limited (Chartered Town Planners) is Instructed by Swan Hill Homes Limited (Swan Hill) to prepare and submit representations on their behalf in respect of the Rochford District Local Development Framework: Core Strategy Submission (September 2009) Development Plan Document.

1.2 The comments refer to the relevant sections and policy designations in the Submission document, as appropriate.

1.3 The comments set out in this submission are intended to assist the District Council in taking forward its Local Development Framework. It is our intention to continue to be involved in the LDF preparation process and we look forward to the opportunity to comment further at the Examination to the Core Strategy.

1.4 If you have any queries regarding the content of this submission then please do not hesitate to contact:

Peter Kneen BSc (Hons) MSc MRTPI
Planner

2.0 Housing:
Policy H1 - The Efficient Use of Land for Housing

2.1 Swan Hill recognises the importance of seeking to concentrate new developments mainly in the existing urban areas, on previously developed land where possible, particularly in view of the Government seeking to ensure 60% of all such new developments are on previously development land (PDL).

2.2 However, given the character of the District, and the strategic housing requirement of the East of England Plan, Swan Hill supports the approach that the Council must also make provision for additional development on the edge of existing settlements on greenfield sites, particularly in the most sustainable locations. As such, Swan Hill supports that where feasible, the redevelopment of existing employment sites for residential/employment purposes can make a contribution towards the strategic housing requirement, provided that sufficient additional employment land is brought forward to ensure the stability of employment levels in the District, and to ensure employment growth meets the East of England Plan requirements.

2.3 Swan Hill considers that Policy H1 should include consideration that new extensions to existing settlements have regard to their potential impact on the wider characteristics and openness objectives of the Green Belt.

Policy H2 - Extensions to Residential Envelopes and Phasing

2.4 Swan Hill generally supports the approach taken by the Council in this policy. As set out above, Swan Hill consider the Council's acknowledgment that housing requirements should be met through the allocation of land on the edge of the existing settlements is the most suitable way forward to meeting the Council's strategic housing requirement and complies with the advice in PPS3.

2.5 The need for suitable greenfield urban extensions represents the best way forward for the Council to meet its strategic housing requirement, as set out in the East of England Plan. Swan Hill supports the recognition that the potential supply of alternative previously developed sites is limited, without detrimentally affecting the character of the District, and therefore the best way forward is the use of sustainable greenfield urban extensions to the existing settlements of the District.

2.6 However, Swan Hill consider that a fundamental consideration that the District Council should consider relates to the potential impact of the urban extensions on the Green Belt policy has been somewhat overlooked. The wider sustainability credentials of the settlements of the District should only be one of many key considerations for determining the level of expansion. In view of the proximity of Southend-on-Sea to all the main settlements of the District, and the influence this has on the likely location many people would travel for employment and leisure, sustainability of many of the settlements is not a key overarching factor, and greater weight should be placed on the potential impact on the openness of the Green Belt, as this cannot be remedied if development occurs in the wrong location.

2.7 As such, Swan Hill considers that determining the location of growth for the main settlements should be to identify

Core Strategy Submission Document

S - 16880 - 8329 - Policy GB1 - Green Belt Protection - None

16880 Support

CHAPTER 6 Policy GB1 - Green Belt Protection

those locations where the impact on the wider setting of the Green Belt can be minimised. Further justification for those general locations chosen should be identified in Policy H2. In this regard, Swan Hill has serious concerns regarding the removal of Land South West of Great Wakering as a viable option for the growth of the settlement. The development of this area of Great Wakering, in addition to the potential redevelopment of the Star Lane Industrial Estate could provide a more comprehensive development, whilst ensuring that the wider openness of the Green Belt is maintained. Land South West of Great Wakering is significantly better placed to limit the impact on the wider Green Belt than Land West of Great Wakering, and could contribute to the provision of an important amenity and wildlife site for the local community.

2.8 In addition, Swan Hill consider that the Council now has no reserve provision in the event that any of the existing employment sites set out in Policy H1 fail to come forward for development within the envisaged timescale. Further, Land West of Great Wakering has not been identified in the SHLAA as a deliverable site to help meet the strategic housing requirement, contrary to the requirement set out in PPS3.

2.9 As such, Swan Hill would support the provision of suitable sites which could be safeguarded for future development in the likelihood of a shortfall in supply.

Policy H3 - Extensions to Residential Envelopes Post 2021

2.10 As set out above, Swan Hill supports the overall approach the Council has taken towards the provision of sustainable urban extensions as a suitable means of meeting their strategic housing requirement. However, as set out for Policy H2 above, Swan Hill has serious concerns regarding the removal of several proposed sites set out in the October 2008 Preferred Options Core Strategy, without any guarantee of the ability to deliver those sites set out in Policy H1.

2.11 As also considered above, the inclusion of West of Great Wakering for 250 dwellings should not be included ahead of South West of Great Wakering, in view of the fact that the site is not identified in the SHLAA as available, suitable and achievable as required by PPS3, and thus is not supported by a robust and creditable evidence base for its inclusion as a strategic site for development.

2.12 Whilst Swan Hill acknowledge that alterations to Policy H1 has resulted in the removal of some locations for growth in Policy H3 (as set out in the Sustainability Appraisal), Swan Hill does not consider that the most appropriate locations have been chosen.

2.13 In addition to the matters raised above, the use of West of Great Wakering would also result in the loss of valuable agricultural land, which clearly in a Green Belt location, should be less suitable for development than other sites, such as South West of Great Wakering, which would have limited impact on the wider Green Belt policy, and not result in the loss of valuable agricultural land.

2.14 Finally, in respect of Policies H1, H2 and H3, all of the above comments are based on our interpretation of the Submission Version Core Strategy when compared to the October 2008 Version of the Core Strategy. Without the ability to undertake a detailed assessment of the Council's SHLAA, it is not possible to clarify the proposed Core Strategy position regarding the proposed direction of growth proposed for the settlements in the District. As such, Swan Hill reserves the right to make additional representations regarding the proposed Policies H1, H2 and H3 following the publication of the SHLAA in due course.

Policy H4 - Affordable Housing

2.15 In general terms, Swan Hill supports the approach taken by the Council towards the provision of affordable housing for new residential developments. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H5 - Dwelling Types

2.16 Swan Hill supports the policy provision of H5, and considers that the approach taken by the Council for this policy represents a suitably flexible alternative to stipulating percentages of dwelling mix, sought by some local authorities. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H6 - Lifetime Homes

2.17 In regard to this policy, Swan Hill objects to the Council's policy where all new dwellings should be provided to the Lifetime Homes Standard. Whilst it is acknowledged that the UK has an aging population, Swan Hill considers that seeking to provide Lifetime Homes on all sites is considered to be overly onerous for proposed developers, particularly when considering the requirement for all car parking spaces to be suitable for disabled users, which could result in more schemes becoming unviable. Therefore, the provision of a percentage of Lifetime Homes should be considered through negotiations with the Council at the planning application stage, and should be determined on a case-by-case basis.

3.0 Character of Place: Policy CP1 - Design

Core Strategy Submission Document

S - 16880 - 8329 - Policy GB1 - Green Belt Protection - None

16880 Support

CHAPTER 6 Policy GB1 - Green Belt Protection

3.1 The Town and Country Planning (General Development Procedure) Order 1995 (As Amended) makes the submission of a Design and Access Statement for most types of planning applications a Statutory requirement, and as such, the provision of a Design Brief represents a pre-requisite of all major planning applications.

3.2 Policy CP1 seeks to ensure the provision of good, high quality developments that reflect local characteristics and distinctiveness, this ideology is supported by Swan Hill.

4.0 The Green Belt:
Policy GB1 - Green Belt Protection

4.1 Following the amendments to the wording of the Policy since the October 2008 Preferred Options Core Strategy, Swan Hill is now generally supportive of Policy GB1 and its supporting text. However, as expressed above, it is important that where alterations to the Green Belt boundary occur as a result of the extension of the settlements to meet the strategic housing requirement, both the minimal amount of land is taken and where that land is taken for development, it represents the best available land which has a minimal impact of the wider openness characteristic of the Green Belt.

5.0 Environmental Issues:
Policy ENV3 - Flood Risk

5.1 Swan Hill generally supports the approach set out in Policy ENV3 regarding ensuring development accords with the sequential test of PPS25. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV4 - Sustainable Drainage Systems (SUDS)

5.2 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV4. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV8 - On-site Renewable and Low Carbon Energy Generation

5.3 Whilst Swan Hill recognises the importance of reducing carbon emissions, particularly in new housing developments, and the role this can play in reducing the nations overall Greenhouse emissions. As such Swan Hill is generally supportive of Policy ENV8. It is noted that Policy ENG1 of the East of England Plan sets out a threshold of developments comprising 10 or more dwellings. Swan Hill consider it important for the District Council to justify the reduction in the threshold level.

5.4 Further, no assessment of Policy ENV8 has been set out in the Sustainability Appraisal which justifies the change in threshold from that of Policy ENG1 of the RSS.

Policy ENV9 - Code for Sustainable Homes

5.5 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV9. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

6.0 Community Infrastructure, Leisure and Tourism:
Policy CLT1 - Planning Obligations and Standard Charges

6.1 Swan Hill generally supports the overall approach the Council has taken in Policy CLT1. It is considered Policy CLT1 sets out a degree of flexibility to ensure that all sites are considered on a site-by-site basis, assessing the individual merits of each planning application, in order to ensure the levels of contributions applicable meet the five tests of Circular 05/05. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policies CLT5 - Open Space;
CLT7 - Play Space;
CLT8 - Youth Facilities; and,
CLT10 - Playing Pitches

6.2 Swan Hill supports the need for new residential developments to incorporate a degree of new publicly accessible open space, children's play space, youth facilities and playing pitches, and as such, generally supports the policy approaches taken by the Council.

6.3 However, it is important that whilst the Council may seek to undertake an assessment of providing standard charges for new development, which, as set out in Policy CLT1, this should be based on thorough public consultation and consideration and sound justification. Swan Hill consider that within the provision of a standard charge, it is important that such provision allows for a degree of flexibility to ensure that each site is assessed individually and on its own merits. This is particularly important for those sites close to existing open spaces and facilities. As such, the levels of

Core Strategy Submission Document

S - 16880 - 8329 - Policy GB1 - Green Belt Protection - None

16880 Support

CHAPTER 6 Policy GB1 - Green Belt Protection

open space and recreation facilities required in the 'standard charge' should be based on an up-to-date PPG17 Open Space assessment, which should be used to form a key consideration in the levels of provision likely to be required in the standard charge system proposed.

7.0 Transport: Policy T1 - Highways

7.1 Swan Hill supports the overall objectives set out in Policy T1 requiring developments to be located and designed to reduce the reliance on the private car and to meet the infrastructure needs generated by development or seek to help achieve these needs is acceptable in principle.

7.2 Swan Hill recognises the importance of providing sufficient infrastructure provision to meet the requirements of development, and that where developments have insufficient consideration of impact on existing infrastructure, they should be considered unacceptable and contrary to National policy guidance. However, Swan Hill considers it important to emphasise that the developer's role should not be seen as a means to meet existing shortfalls in provision.

Policy T3 - Public Transport

7.3 Swan Hill is generally supportive of the policy approach set out in T3, however, as set out in paragraph 7.2 above, it is important that the District Council do not consider that it is the developer's responsibility to resolve existing shortfalls in provision of public transport, and any contribution towards additional public transportation provision should only be to mitigate against the additional level of demand likely from the development proposed.

Policy T5 - Cycling and Walking

7.4 Swan Hill supports the general approach to this policy, as Swan Hill recognises the importance of promoting the use of alternatives to the private car. The policy provision acknowledges the need to ensure relevant contributions in the event of additional travel demands generated by individual developments, whilst also setting out additional aspirations for the cycle network in the District.

7.5 As such, Swan Hill considers this policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy T8 - Parking Standards

7.6 The Council has recently (January 2007) adopted SPD on the requirements for parking standards, and as such, Swan Hill generally supports the policy approach chosen by the Council. As set out in the SPD, whilst Swan Hill generally supports the approach taken by the District Council towards setting residential parking standards, in that the Council has recognised that in the suburban areas, even with some access to public transport, the majority of residents will rely on the use of private cars. However, Swan Hill has concerns over the failure of the District Council to comply with the provisions of PPG13: Transport (2001) which sets out that Local Planning Authorities should not set minimum standards for car parking. Whilst it is acknowledged that PPS3 sets out provision for the consideration of local circumstances, it is considered that the Council has not justified this deviation from PPG13's maximum standard.

7.7 Whilst it is acknowledged that such justification may become apparent through the work currently being undertaken by Essex County Council, until such time, the District Council should only seek to apply the maximum standards indicated in PPG13. However, Swan Hill recommends that the District Council make provisions in the wording of the Policy to allow for changes in the event that future policy on car parking standards need to reflect the County standard, following the completion of the County Council review.

8.0 Economic Development: Policies ED3 - Existing Employment Land ED4 - Future Employment Allocations

8.1 In respect of Policies ED3 and ED4, Swan Hill notes that they have changed considerably since the October 2008 Preferred Options document, in that they are site specific regarding the location of the proposed redevelopment of existing employment sites. These four sites are also identified in Policy H1 - Efficient Use of Land, and in general, Swan Hill supports the approach to the redevelopment of these sites (where feasible) based on the assessments of the sites set out in this version of the Core Strategy.

8.2 However, Swan Hill has concerns that these policies might not be considered suitably sound given that insufficient opportunity has been allocated for consultation on their redevelopment. Without the SHLAA being publically available prior to the consultation on this Core Strategy, an insufficient evidence base has been provided to corroborate that these sites are neither suitable or deliverable to meet the test of soundness requirements.

Summary: Policy GB1 - Green Belt Protection

4.1 Following the amendments to the wording of the Policy since the October 2008 Preferred Options Core Strategy, Swan Hill is now generally supportive of Policy GB1 and its supporting text. However, as expressed above, it is

Core Strategy Submission Document

S - 16880 - 8329 - Policy GB1 - Green Belt Protection - None

16880 Support

CHAPTER 6 Policy GB1 - Green Belt Protection

important that where alterations to the Green Belt boundary occur as a result of the extension of the settlements to meet the strategic housing requirement, both the minimal amount of land is taken and where that land is taken for development, it represents the best available land which has a minimal impact of the wider openness characteristic of the Green Belt.

Change to Plan N/A

Appear at exam? Not Specified

Soundness Tests N/A

Core Strategy Submission Document

S - 16928 - 10009 - Policy GB1 - Green Belt Protection - None

16928 Support

CHAPTER 6 Policy GB1 - Green Belt Protection

Respondent: Barratt Eastern Counties [10009]

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Agent: Kember Loudon Williams Ltd (Mr Martin Hull) [8466]

Kember Loudon Williams Ltd
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Full Text: Local Development Framework

Representations on the Core Strategy
Submission Document, November 2009
On behalf of Barratts Eastern Counties

Introduction

The requirements of Core Strategies are enshrined in the 2004 Planning and Compensation Act, the Town & Country Planning (Local Development) England (Regulations) 2004 and the 2008 policy guidance in PPS12. The requirements of Coe Strategies are clear. And they are legal requirements. The Core Strategy must comply with the Local Development Scheme, Statement of Community Involvement and the Regulations. The Core Strategy must be subject to a sustainability appraisal, have regard to national guidance, conform generally with the Regional Spatial Strategy and have regard to any Sustainable Community Strategy. A Core strategy must be sound - justified, effective and consistent with national policy. The following representations therefore focus on these legal requirements.

HOUSING

Paragraph 4.6 - Evidence Base

To meet the soundness test Submission Core Strategies (SCS) must be justified, that is to say it must be founded on robust and credible evidence base and comprise the most appropriate strategy when considered against reasonable alternatives. The housing strategy in as far as it identifies a need for Green belt sites is sound, however, there are other elements which are unsound.

Paragraph 4.6 notes that the Strategic Housing Land Availability Assessment (SHLAA) has examined the supply of housing. It is presumed that the Table at paragraph 4.6 is the outcome of this examination. Whilst the SHLAA has some legitimacy in that it identifies various sites that are apparently available, we are concerned that because the SHLAA was only published in November 2009 it post dates the SCS. This implies that the SCS is driving the SHLAA exercise rather than the other way round. Whilst this may have no real practical effect on the outcome of the SCS and the identified need for Green Belt sites, the Inspector will be mindful of the advice in paragraphs 33 and 54 of PPS3 that SCS draw on the evidence in SHLAA. It may be that the SCS should explain how the evidence base has been used to justify the strategy.

PPS12 explains at paragraph 4.37 that Core Strategies are based on thorough evidence. Since the SHLAA has only recently been published it is considered that the SCS is unsound as it is not justifiable. This, together with other comments on the SCS, indicates that the process should be delayed to ensure that a more robust document is placed in front of the EiP Inspector.

Table at Paragraph 4.6 - Evidence base

From our review of the available evidence it would appear that the housing land supply is insufficient and that Green Belt release are required. From the wider strategy being promoted we note that some of the sites that the District Council consider to be 'appropriate' are likely to relate to existing employment areas. As set out elsewhere in our representations, we maintain severe reservations that the redevelopment of existing employment sites for alternative uses and particularly the Eldon Way Industrial Estate is unsustainable. We will make reference to the effectiveness of this strategy in relation to sustainability, whether it is justified in the context of National Policy and the deliverability of such a strategy elsewhere.

In particular, paragraph 11.32 of the SCS refers to existing employment land and sites within the UCS. It does not refer the SHLAA and as such it appears that an evidence base to support the re-use of employment land for residential is not reported in the SCS.

Having reviewed the 2008 Annual Monitoring Report, as we did when commenting on the 2008 Preferred Options Core Strategy, we maintain severe doubts as to the appropriateness of some of the previously developed sites identified as potential housing sites and their expected housing yield. Whilst we cannot at this stage ascertain whether the SHLAA

Core Strategy Submission Document

S - 16928 - 10009 - Policy GB1 - Green Belt Protection - None

16928 Support

CHAPTER 6 Policy GB1 - Green Belt Protection

sites referred to in this table correlate with the Annual Monitoring Report and indeed the 2007 Urban Capacity Study, it is our view that there will be some commonality and so the reliance on these sites is likely to be at odds with Government Policy. We shall elaborate on this objection in relation to the specific housing policy below.

We note that the last two rows in the Table at paragraph 4.6 set out figures with and without Green Belt releases. The text to this section of the Core Strategy should, for reasons of clarity, explain that Green belt review will be necessary in order to deliver the required housing.

Paragraph 4.9

The table on page 40, which sets out the settlement tiers, is supported. Rayleigh, Rochford/Ashingdon, Hockley/Hawkwell are clearly the largest settlements in the District and they benefit from good employment, housing, leisure, community and public transport provision. These settlements are the most sustainable ones with the greatest mix of uses. Consequently, it is sensible that the Core Strategy identifies these as top tier settlements and is able to target them with growth accordingly. This component of the strategy is justified by reference to sustainability data and is effective, since targeting development at these locations will ensure a more sustainable pattern of development.

Paragraph 4.14

We maintain that the strategy for redeveloping the Eldon Way Industrial Estate for housing and other alternative uses to employment is unsound. It is neither justified nor effective. The Industrial Land Availability Study 2006 sets out on page 7 strategic objectives. The 3rd objective seeks to Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive. Clearly the strategy as currently drafted envisages major changes to existing industrial estates, including alternative uses. This strategy is not consistent with other strategies and evidence based studies and so cannot be justified in the context of the tests set out in PPS12. It is also an ineffective strategy since the new employment locations that would free up the Eldon Way site for redevelopment relies on transport infrastructure that has no certainty of being delivered. Principally, the erosion of employment uses at Eldon Way could make the settlement of Hockley/Hawkwell less sustainable and thus conflict with the tiered approach on page 40, paragraph 4.9.

Policy H1

Prioritising the use of previously developed land ("pdl") is supported in principle. It is a justified strategy in the context of PPS3 and effective as sequential choices can be made by implementing the policy. However, the District Council is also promoting a strategy which seeks the redevelopment of existing employment locations to alternative uses and by consequence is identifying green field sites for new employment development elsewhere (Policy ED4 refers). This 'land swapping' is not considered consistent with PPS3, nor is it considered to be justified or effective in delivering the desired strategy. This is particularly the case as most of the existing employment sites are occupied and therefore unavailable for redevelopment. In addition, the new Greenfield sites are in an arguably less sustainable locations away from the top tier settlements identified on page 40 of the Submission Core Strategy. Clearly this element of the strategy is inconsistent with the wider strategy.

The Industrial Land Availability Study 2006 is included as an evidence base by the District Council. It includes an introductory section, which explains that the authority wishes to make Rochford the place of choice for new business. It includes several strategic objectives on page 7 including "Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive." It reviews existing employment areas and identifies vacant land, including land available from allocations. It does not include any assessment of new sites or potential opportunities for new sites that might have been expected to feed into the Core Strategy. The strategy for identifying Green Belt site employment allocation does not appear to be based on any evidence in this document and in that context cannot be justified. The strategy being promoted potentially conflicts with Government policy in PPG13, PPG2 and emerging PPS4.

The Employment Land Study 2008 is a much later document. It has a key recommendation on page ii "we recommend that Rochford District Council adopts strong policies to protect existing employment land." Furthermore under recommendations for existing sites on page iii-iv of that document it states "In our view, Hockley Trading Centre is a strategically well placed employment location. However, we recognise the ambitions of the Hockley Town Centre masterplan and that within this the Council should consider it to be allocated for other uses. However, we recommend that this reallocation happen only if provision is made within the masterplan for office use within Hockley Town Centre as part of a mixed use scheme." The view of the writers of this document is clear - the Eldon Way Industrial estate (Hockley Trading Centre) is a good employment site and that it is for other reasons that alternative uses are being considered and only then if office development is supported. This supports our representations that new future uses at the Eldon Way site should be employment dominated and that alternative uses should relate to the objectives of the Town Centre which is to enhance the shopping and leisure facilities. Residential is not an appropriate alternative.

This document recommends the use of land to the west of Rayleigh for employment and envisages Green belt release. However, the SCS does not explain through the evidence base why existing employment sites should be 'deallocated' and Green belt land unnecessarily used.

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In addition to these key issues we have some specific concerns. As a consequence we maintain an objection to the second paragraph of Policy H1. This policy states that the Council will seek the redevelopment of various industrial estates including Eldon Way. The Policy says that alternative uses will be sought (presumably alternative to the existing employment offer) and that new land will be allocated elsewhere. This policy statement, in relation to Eldon Way in particular, is unsound for a number of reasons:

The emerging Hockley Area Action Plan consulted upon in 2008 states that the Eldon Way Industrial Estate is strategically well placed. In a sense this statement underplays the true importance of this highly sustainable employment location and only major employment area in Hockley/Hawkwell. The employment area is adjacent to the railway station and located a short distance from the main bus routes that run along Spa Road. Some of the residential areas of the town are also within walking distance of this commercial area, thus providing a potential for sustainable travel by employees. The Eldon Way Industrial Estate is therefore right at the heart of the settlement of Hockley/Hawkwell and provides an opportunity to meet sustainable transport objectives by reducing the need to travel by car. Consequently, this employment area should be highlighted as a premier employment site in sustainability terms, both in the context of PPG13, PPG4 and PPS6. To encourage alternative uses as set out in Policy H1 implies the removal of the majority of employment based activity at Hockley/Hawkwell and this would be contrary to National policy, would not be the most appropriate strategy when considered against alternatives and is therefore unsound.

Whilst it is acknowledged that improvement to the Eldon Way Industrial Estate can and should take place, the extent to which the mix of employment uses should be altered in favour of alternative land uses requires careful consideration. It is our view that a mix of existing or indeed new employment land uses with some Town Centre type uses should dominate the Eldon Way site. A mix of employment types between offices, light industry and other high technology industries should be encouraged as this will provide many locational advantages to the firms that agglomerate together. The Council says that the existing uses on this site are harmful to amenity. However, the site has operated for many years without any significant issues and if renewal for B1 type uses are encouraged then the employment area can be maintained without harm to amenity. Renewal of the employment stock can help develop and improve trade, improve the sustainability of businesses as a whole and make for a more flexible labour market as skill levels are varied. A singularly different use altogether or a variety of uses which excludes employment could undermine the long term sustainability of the area and Town Centre. As such Policy H1 is not an effective strategy and should be amended to acknowledge the importance of Eldon Way and the need to renew the employment stock to ensure that the site maintains its important role as a employment site, albeit with some ancillary alternative use development where appropriate.

The 2008 Retail Study notes that Hockley Town Centre is not strong and there is trade leakage. Eldon Way Industrial Estate provides a customer base for existing town centre uses. Weekday spending within town centres is an important contributor to the viability of many retail and leisure businesses either through expenditure by employees during the lunchtime trade or expenditure by employers, on necessary goods and services. This relationship helps sustain the critical mass of a centre and provides a platform for new retail and leisure growth. It is important to have a balanced centre with a variety of uses. Policy H1, as currently drafted, implies the removal of employment related development and this is likely to harm the vitality and viability of Hockley Town Centre. The Council has presented no evidence to suggest that this is not the case. Importantly, the 2008 Retail Study explains that there is a need for additional retail and office space. In principle we would support additional office and other B1 type uses plus retail but employment uses should always dominate for the sustainability reasons given above. Retail and office development are likely to present a viable alternative to some of the more industrial type uses.

Consequently, we do not support the phrasing of the third paragraph of Policy H1 and maintain that the most appropriate strategy is to seek renewal of the employment stock with employment based uses and with some new retail development. Removal of employment land uses completely as currently implied-which was the approach adopted in the emerging Hockley Area Action Plan - is not a justifiable strategy.

One of the key tests of a Core Strategy is consistency between policies in the emerging Plan and this strikes at the heart of demonstrating an effective strategy. Policy H1 implies alternative uses to employment and the relocation of Eldon Way to a site identified under Policy ED4. However, Policy RTC6 sets out a suite of policy criteria for Hockley Town Centre which includes employment and commercial activities. In addition Policy ED3 seeks the protection of sustainable employment sites (Eldon Way) and notes that some reallocation of existing employment sites will include a proportion of employment. It notes that in the case of Eldon Way employment development will form a component. The policies appear at odds with one another. The third paragraph of Policy H1 should be deleted as the second paragraph is sufficient to set a strategic context for delivering new housing development. The employment policies and Hockley specific policies should be left to consider the type and quantum of land uses appropriate in the area. If the third paragraph of H1 is to be retained then it should tie in more with Policy RTC6 and in our view explain that employment uses should dominate any redevelopment proposals for the Eldon Way site and that retail and leisure uses should be a supporting proportion.

Implementation, Monitoring and Delivery - page 132 onwards

One of the key tests of soundness is that the Core Strategy should be effective - it should be able to deliver its strategy. The Implementation strategy set out at page 132 onwards of the Core Strategy does not explain how Policy H1, RTC6 and the strategy for redeveloping Eldon Way (Policy ED2 and ED3) will be delivered. The comment at Policy ED3 on

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page 161 identifies it as a potential risk and alludes to land assembly difficulties and the choices to be made by owner/occupiers. In order to deliver the strategy there should be a clear understanding as to whether the new land use values being promoted are sufficient to encourage relocation voluntarily. Secondly there is a need for more information to be gathered and presented to show that current occupiers and landowners are willing to relocate and the timescales likely for this. For example, do the building lease contracts enable early review or are there any break out clauses. There should be some commentary on whether the Council will engage in compulsory purchase orders to pursue their strategy should the 'encouragement' route fail. As currently drafted there is no clear path to deliver the strategy and the danger is that despite reallocation, the sites identified for redevelopment will not come forward in the plan period. In this regard, evidence to satisfy the test of soundness is not provided.

Policy H2 - General Locations

We support the strategy that new housing growth should be targeted at land South of Hawkwell. This area is suitably located to the urban area of Hockley/Hawkwell and to tie in with the settlement tiers on page 40 of the Submission Core Strategy the same terminology for settlement should be used. This ensures a consistency within the SCS. The choice of this location as a housing growth area is appropriate as it would not contribute to the coalescence of the urban area with Ashingdon (there is existing development between this identified housing area at Rectory Road and Ashingdon and moreover, Rectory Road can form a natural physical boundary for the new Green belt boundary. This area is also well located to the existing road network. Cherry Orchard Way has recently been improved and provides much better accessibility to the proposed housing growth area than any other location around Hockley/Hawkwell. The existing bus routes along Rectory Road also make this location sustainable and the additional housing proposed will help underpin the financial viability of bus routes in this area. Locally there are employment opportunities, including the small commercial estate off Main Road. The Eldon Way Industrial Estate adjacent to the Town Centre also provides the opportunity for employment locally. Extensive public open space, play pitches and built leisure facilities are located just to the north of this area and a community hall is located off Briar Close, nearby. The area to the south of Hockley/Hawkwell is close to local shops on the corner of Heycroft Road and Main Road and there are numerous footpath links between this area and the local community including links via Thorpe Road, Thorpe Close, Briar Close, Hawkwell Park and Park Gardens. The area therefore provides the opportunity to enhance existing links, including cycle links, and contribute towards community integration - more so than other sites on the south side of this settlement. The site is also in the control of one house builder and deliverable.

However, we find that the Policy is not fully consistent with national policy and furthermore needs to be reviewed in order to be justified and effective. We have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with this policy and feel that Green Belt review should be more explicit throughout the SCS. We note that it is only Policy H3 which indicates the need for Green Belt land review. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H2 and certainly Policy H3 and Policy GB1 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary.

Policy H2 - Phasing and Quantum

The 2008 Preferred Core Strategy document indicated that the area south of Hawkwell should deliver 330 dwellings over a phasing period to post 2021 (see Policy H2 and H3 of that document). The SCS reduces the quantum of housing in this area to 175 but expects delivery by 2015. At a broader level the Preferred Options Core Strategy of 2008, (Policy H2) required 1,450 dwellings to 2015 and a further 1,050 by 2021. In the SCS the figures are now 775 and 1,010 respectively.

Since the SHLAA post dates the publication of the SCS, we are uncertain as to the reason why such a significant reduction in quantum of housing and extensions to the residential envelope is considered necessary. Presumably it is the 'new' strategy to redevelop existing employment areas within the settlements that has led to this change. Our representations on this strategy and specifically the Eldon Way Industrial Estate are included elsewhere within our representations. Previously we have commented on the Table at paragraph 4.6 of the Submission Core Strategy and the lack of evidence to underpin that table. It seems odd that in the space of a year the expected requirement for Greenfield sites has effectively halved on the basis of a SHLAA exercise. The community is therefore not able to effectively

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comment on the housing land supply and at this stage the Submission Core Strategy is legally unsound.

That said, we are of the view that the quantum of housing envisaged south of Hockley/Hawkwell should be more than the 175 currently envisage. In coming to this view we have reviewed the Urban Capacity Study and the latest housing figures in the Annual Monitoring Report 2008. We conclude that the shortfall in housing land supply is such that 330 dwellings in this location is appropriate.

The recently published SHLAA is based upon the data obtained from the Urban Capacity Study 2007, a call for sites exercise and data from the Annual Monitoring Report 2008.

The 2007 Urban Capacity Study (UCS)

1. 2007 is widely recognised as being the peak level of house prices in the UK and it was acknowledged by Government and practitioners alike that 2007 house prices were at an unsustainable level. It is our view that utilising the 2007 UCS as an evidence base without reference to the market does not pick up the depressed demand that is likely to now exist. Recent corrections to the housing market now mean that housing land prices are at a much lower and arguably more affordable level than before. The implications are that some pdl may not be viable for housing development. Often brownfield sites have much higher development costs than Greenfield sites and so the yield from urban capacity will be much lower than anticipated in the 2007 study. One example is the employment allocation of the Adopted Local Plan located at 76-92 Main Road, Hawkwell. This site has been allocated for several years and has been available during the most recent rises in residential property prices during 2006-07. As a consequence the lack of progress on the site can only be described by its current occupancy and perhaps it comprises high value uses that do not encourage redevelopment. Despite this the site is identified as having high potential for alternative use and high potential demand. The SHLAA form notes that there is no information on legal constraints (e.g., tenancy agreements) As a consequence it is difficult to see how this could continue to be a potential site and as a consequence the allowance for green field releases should be increased.

2. There are considered to be other instances in the UCS and the recently published SHLAA where the assumptions and calculations would indicate that the 1301 urban capacity figure is over optimistic and the SHLAA assessment is limited. In the assessment of 'non-residential sites in appropriate locations' within the UCS assumptions are made as to the probability of sites coming forward for new housing. 68-72 West Street, Rochford is identified as a high probability site but we note that it has been subject to 7 refusals of planning permission/conservation consent. There is a significant gap between the urban capacity identified as being suitable by the Council and the capacity applied for by the owners. Given its alternate use value, it is debateable whether the two capacity figures can be reconciled. No 247 London Road is another example of a site allocated in the Local Plan but which hasn't come forward. This is now the subject of a proposal for a care home and if approved would further limit the scope for market/affordable housing capacity on the site. A striking example of how the urban capacity study has underestimated is also evidence by 2-4 Alderman's Hill, Hockley - described as a disused service station. There has been no residential development application on this site since 2004 and most recent applications have sought commercial use of the site. Rather than being evidence of housing land deliverability, this particular site evidences the need for commercial uses in the area. There are therefore deliverability doubts over these 'high probability' categories which amount to some 40 units.

3. In relation to the assessment in the UCS entitled 'intensification of existing residential uses' we note that the assessment is premised on an assessment of recent trends taking into account net completions between 2001-2006 and 2005-06. This is effectively an assessment of windfall trends and not an approach that PPS3 encourages. Importantly Table 3-12 in the urban capacity study seeks to project forward urban capacity from residential redevelopment - a period that benefited from high house prices and PPG3 guidance encouraging redevelopment. These two circumstances have markedly changed and so the assumptions and conclusions drawn would also have changed. Even taking into account the UCS discounting, the reliability of the 404 units from this source must be questioned and in our view the 1301 figure cannot be a sound basis for urban capacity and further Greenfield releases are necessary.

4. In the section of the UCS entitled 'subdivision of dwellings' and 'living above the shop' it is estimated that recent trends would result in 7 and 15 units. Our concerns with using trends as a basis for urban capacity are detailed above - PPS3 does not encourage this. Rather, local authorities are charged with surveying their areas, identifying which areas may yield urban capacity and how much and developing policies to achieve that. Government guidance does not encourage the estimation of windfalls in the way the UCS does.

5. Redevelopment of established employment land is a separate section within the UCS. At 1 above we identify the low probability of the Main Road residential allocation coming forward. This remaining section of the UCS considers 11 further employment sites which were first identified in the 2000 UCS. Three of these are considered to have a high probability of coming forward. We have looked at these three sites and can find no evidence that they are likely to come forward. In the 8 years between 2000 and 2008 the three identified high probability employment sites have not been developed and there is no reason to assume that the next 5-10 years will be any different. For example the Rawreth Industrial Estate is identified as being well used in the UCS and although it has some unneighbourly uses there is no indication that the site is available, suitable or deliverable for residential. Land between 39-69 Lower Lambricks, Rayleigh is identified as having a high probability of residential uses. Yet there is no

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evidence of any pre-application advice or planning applications for this area. Stambridge Mills, Mill Lane, Stambridge is a further example. This site is separated from the urban area, in a flood risk zone and protected in the 2006 Replacement Local Plan by Policy EB9 which promotes B1 uses. Against this background there is only two relevant planning applications affecting this area both date from the early 1990's and relate to a plant room and loading bay. There is no evidence that this is likely to come forward for residential purposes in the next 5-10 years.

6. In the UCS extant permissions are identified as 856 dwellings. It is important to note that this figure needs to be continually reassessed so that from the point of adoption of the Core Strategy a 5 and 10 year housing land supply is available. The SHLAA notes extant permissions for 2009-14 being 106. As noted below extant permissions do not necessarily translate into deliverable sites. There is therefore a contingency that needs to be built in. Further allocations on greenfield land need to be increased and as such the quantum of housing in the area south of Hockley/Hawkwell should be increased to 330 dwellings in order to begin to meet the shortfall identified.

The District Council's 5 year housing supply assessment

7. The District Council's Annual Monitoring Report ("AMR") 2008 purports to demonstrate a 5 year housing land supply. The preamble to Table 4.10 in the AMR 2008 explains that Rochford District Council ("RDC") has included units under construction, units with full permission, units with outline permission, units with a resolution to grant, units subject to preapplication discussion/Urban Capacity Assessment and land allocations in its trajectory. The reader is referred to Appendix B which breaks down the sites in more detail. The recently published SHLAA also includes a table showing a potential 1273 dwellings deliverable. However, it refers to "appropriate brownfield sites." Since these 'appropriate sites' are do not benefit from an application or a planning permission it is difficult to programme them into the housing delivery trajectory.

8. In the full planning permission category of the AMR 2008 where work has not yet started there can be no guarantee that all these sites will be delivered in the 5 years. This comment relates to the one above in relation to the recently published SHLAA. It is not uncommon for permissions to be obtained to provide a means for valuing a site where the owner has no immediate plans to sell the site or develop housing. Delivery may also be hampered by funding constraints, or site assembly problems (where sites are in an alternative use or relocation constraints). Appendix B of the AMR 2008 does not set out the intentions of the landowner or whether the sites are truly achievable in the 5 year period as per PPS3 requirements. The SHLAA purports to show developer intentions at Appendix C but the assessment by the local authority into the legitimacy of some of the claims is not presented. The evidence base is not as full as it should be to demonstrate the robustness of Table 4.6 of the SCS. It is also unclear the extent to which this table is based on either the UCS 2007, AMR 2008, SHLAA 2009 or a combination of all three. This should be set out clearly.

9. In addition, to the 'non delivery' of a proportion of new homes in the AMR 2008, there is concern at the timings of delivery in that data set, for example, 10 units in 2008-2009 relates to outline planning permissions and it is doubtful whether reserved matters can be turned round quick enough to begin delivering housing in this year period. There could well be examples in that set of data where the delivery of units in the first year of the 5 is unlikely, thus delivery is reduced for that period and pushed back and this process is then compounded throughout the data set up to and beyond year 5. Statistical evidence from the Department of Communities and Local Government ("CLG") reveals that building starts are 43% down on the quarter to March 2009 compared with March 2008. It is not clear whether the recently published SHLAA has taken this into account and unless it does the data in the Table at 4.6 of the SCS cannot be relied upon, particularly given the current recessionary circumstances. In relation to the Table at Paragraph 4.6 a refinement is therefore needed to take into account this effect on phasing.

10. This problem is compounded for other units relied upon where permission has been granted but no start on site has been made; this accounts for a considerable number of sites in 2009-10 period (100 dwellings) which is (year 2 of the 5 year period). A delay in these will require more Greenfield sites to be identified in order to meet the shortfall.

11. Finally we note that the East of England Plan expresses its land supply requirement as a minimum. This strategy is not reflected in the

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Submission version of the Core Strategy policy H2.

12. In summary since neither the UCS nor the Annual Monitoring Report form a SHLAA, reservations are maintained about the degree to which sufficient housing land has been identified.

Policy H3

In the Preferred Options Core Strategy 2008 more locations were identified for housing growth in the post 2021 phase. Whilst it is our view that land south of Hockley/Hawkwell should benefit from a greater number of dwellings than the 175 currently identified (330) in order to make the strategy effective. We are concerned at the significant change in strategy between the Preferred Option Core Strategy and the Submission version, which has significantly less housing growth on green field sites. This change in strategy is so significant that we would question whether it is appropriate in the context of soundness and the consultation processes that have taken place so far.

We also have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with other policies in the SCS and feel that Green Belt review should be more explicit throughout the SCS. As it currently stands there is a potential conflict with national policies and limited justification for the Green belt strategy. We note that in Policy H3, which indicates the need for Green Belt land review, the advice is limited and unclear. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H3 and Policy GB1/H2 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary. Not to do so is unsound for justification and effectiveness reasons.

Policy H4 - Affordable Housing

As currently drafted we feel that the policy is not concise enough and that the policy does not reflect current guidance. The phrase 'at least' would indicate that in most cases affordable housing above 35% will be sought. Our understanding is that the 35% figure is recommended in the SHMA and that to provide a policy framework which seeks to go beyond that figure would potentially be unworkable as many sites could not financially bare the burden of over a third of the net developable area not yielding a value. The policy should be redrafted so that "a target of 35% affordable housing shall be provided on all developments of 15 or more units..."

The last policy paragraph provides some scope to relax this policy, if there are clear site constraints that make on site provision impossible. The policy, though, is not particularly clear on what would constitute exceptional circumstances. For example, physical site constraints, which unusually raise development costs, would be one such reason and this should be specified. There may be other reasons including the nature of housing needs in the part of the District the site is located which justify affordable housing below the 35% target. Design reasons may also have a bearing on how provision is made and in what form, particularly if the site is in an historic area where design might override housing need argument. It is therefore recommended that the policy expand on the type of circumstances where affordable housing may be relaxed and the type of information that will be sought of applicant's who have a need to invoke this part of the policy.

Policy H5

In support of the policy, it is advantageous that no percentages requiring a specific mix are included. This flexibility will enable developers and the Council to respond directly to changing circumstances in the local housing market. In the past some authorities have set out a percentage for the type of housing they require only to find that after a few years of strict implementation there is an oversupply of property of that type and no flexibility in the policy to address the problem.

Policy ED2 - London Southend Airport

It is considered that to grow non aviation related employment at a location north of Southend Airport where sustainable access from the rest of Rochford District requires careful consideration. Most Airports are serviced by aviation related employment development and as such a location close to the airport is sensible and sustainable. However, for surface access reasons it would be inappropriate to encourage travel from Rochford's main settlements to what essentially

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would be a rural location for general employment uses. Whilst sustainable access would be improved by a railway station and better bus links, there is no evidence to suggest that a sustainable surface access strategy for non related employment development at the Airport can be achieved. Paragraph 11.22 explains the critical importance of a railway station to the delivery of the strategy yet the Transport Chapter and Implementation Chapter provide neither a policy nor an assessment of deliverability. It is also notable that the South Essex Rapid Transit Policy T4, as set out at paragraph 10.16, notes that Rochford is not proposed to be served but may be served in future phases. This uncertainty is no way to plan for a major employment land supply strategy in the District. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley/Hawkwell, Rochford and Rayleigh is unsound.

Policy ED3

We fully support the first sentence of the Policy and note the apparent contradiction with the statements in Policy H1 and elsewhere which seeks to develop on alternative uses at industrial estates such as Eldon Way.

This contradiction is evidence in the second paragraph of Policy ED3. In our representations on Policy H1 we have explained why it is not sound to diminish the employment stock at Eldon Way and the importance of maintaining a dominance of employment type uses at this estate. These arguments are not repeated here.

We note the sentiments of the third paragraph and in accordance with our representations elsewhere are of the view that this sentence should be revised to explain that Eldon Way will accommodate principally employment type uses. As noted elsewhere uses which are an alternative to employment would diminish this highly sustainable employment site and this is unsound when assessed against National Policy.

Policy ED4 - Future Employment Allocations

In part, the de-allocation strategy is not supported as it is considered unsound when set against sustainability criteria. In relation to the Eldon Way Industrial Estate it is considered critical to the ongoing sustainability of this settlement that employment uses are maintained at this location. It is close to the railway station, bus routes and local residential areas from which the opportunity exists for employees to walk or cycle to work. Its location adjacent to the Town Centre offers opportunity for some retail and leisure development to complement the centre and to maintain a supporting function. These sustainable benefits would not occur with the deallocation of Eldon Way or the significant erosion of its employment floorspace. Whilst redevelopment of the employment site to achieve new employment is supported, the dominant land use should continue to be employment use. As a consequence, the 18ha of land required for employment in this policy is considered to be excessive and the policy should be reviewed to explain that redevelopment of existing employment sites for primarily new employment development will be encouraged.

Policy T4

It is noted that the South Essex Rapid Transit policy, as elaborated upon at paragraph 10.16 notes that Rochford is not served but may be served in future phases. This uncertainty is contrary to the delivery principles of soundness and directly puts at issue the employment land supply strategy in the District which is founded on sustainable access to new sites. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley, Rochford and Rayleigh is unsound.

Appendix H1, CTL1 - Infrastructure

It is recognised that necessary infrastructure provision is an important part of creating a sustainable development and in that context appendix H1 is supported. The supporting text notes that the table at Appendix H1 is not exhaustive and in that context it is very important that the framework properly distinguishes between what should be provided as part of new development schemes and what shouldn't. It is therefore essential that the framework acknowledges the importance of Circular 05/05 and the tests which say that provision of infrastructure and/or contributions should be:

- * Relevant to planning
- * Necessary to make the proposed development acceptable in planning terms
- * Directly related to the proposed development
- * Fairly and reasonably related in scale and kind to the proposed development
- * Reasonable in all other respects

As is made clear (Paragraph B9 of Circular 5/05) contributions should not be used to make good existing deficiencies in infrastructure provision. Nor are they to be used to secure contributions to the achievement of wider planning objectives that are not necessary for consent to be granted. In that context the Core Strategy should set this out as its policy framework.

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The objectives of this policy are supported, although as noted in other representations the SCS is unsound as it does not meet the tests in relation to justification, compliance with national policy or effectiveness of strategy.

Policy GB1 mentions the objective to allocate the minimum amount of Green Belt land necessary. The policy should link to the requirements of PPG2 and RSS which are discussed in relation to the representations on Policy H2 and H3. The policy should set out a timeframe for the review and why Rochford requires a Green Belt review (what the exceptional circumstances are in this District that justify a review of local boundaries. The policy should be amended to set out a 2031 time frame and this may require the SCS to have an extended life span beyond 2021.

We would recommend the deletion of the word character since Green Belt designation is not related to landscape character as currently drafted. For clarity we would also recommend that the Policy or its supporting text explain that a Green Belt review will take place in support of an allocations document (paragraph 6.6) in order to identify an appropriate new boundary. This is particularly necessary given the commitment to a Green belt review in the adopted Local Development Scheme.

Policy CLT1 - Planning Obligations and Standard Charges

In view of the need to test fully the basis on which standard charges are based it is important that any document produced is in a development plan document that enables an examination in public. The policy should explain this in order that when the document is produced it accords with Policy and is based on sound evidence.

ENV9 - Code for Sustainable Homes

Object. The advice from the Department of Communities and Local Government is that the new requirement to have a rating against the Code does not make it mandatory to build a Code home or to have each new home assessed against the Code. It does however mean that all buyers of new homes be given clear information about the sustainability of the new home. A house builder can do this in one of two ways:

- they can choose to build a Code home, have that home assessed against the Code and provide the home buyer with a Code certificate stating the star rating the home has achieved
- or, they can choose to build to current building regulations standards, not to pay for an assessment and instead download a nil-rated certificate of non-assessment (also referred to as a nil-rating) to provide to the home buyer.

As such the Rochford policy requirement that coding 3 be achieved by 2010 and Code 6 by 2013 is out of step with Government advice. The policy wording should explain that it is just the coding that is a requirement of new homes and not necessarily that new homes should be constructed to achieve a standard.

The current Government objectives are for the code to be introduced over a reasonable period with development to be code 3 by 2010, code level 4 by 2013 and code level 5 by 2016. In this regard the policy, as drafted, seeks to achieve code 6 by 2013 and consequently compresses the code requirements into a shorter time scale with the costs associated expected to be subsumed within the housing market through higher prices. This is not a realistic strategy for the delivery of sustainable homes and we consider that the policy should be revised to extend the period of compliance but to also make it more flexible based on local circumstances.

Research undertaken on behalf of the Housing Corporation and English Partnerships, published in February 2007 'A cost review of the code for sustainable homes' reveals that code 6 is unlikely to be unattainable given existing technologies and that achieving code 5 could result in a 12% to 20% increase in costs that would have to be passed onto the consumer. Given the variability of the housing market with peaks and troughs, it is unlikely that the housing market would be able to subsume this level of price increase.

The code system policy as currently drafted does not have regard to site circumstances and so many of the requirements could be difficult to meet. For example, micro electricity generation on site may be difficult to achieve where local circumstances deter the capture of wind or solar power. If more expensive technologies are required to generate power than is the norm then costs will rise. There may be other competing reasons why designs cannot include certain sustainability measures if housing sites are in sensitive landscape and historic locations. Alternatively there may be significant development costs associated with site specific circumstances and so viability of the site's development becomes a valid consideration. By insisting on the code for sustainable homes other policy objectives such as affordable housing at particular rates and other contributions may need to be reconsidered. Consequently, we are of the view that this policy should be drafted in a manner which enables site specific circumstances to be taken into account. As noted above the Government explains that the code is a certification requirement and does not necessarily mean that buildings are constructed in accordance with a code level.

It is also important to note that it is not the purpose of planning legislation to duplicate other legislation. In this regard, the policy should accept that the Building Regulations will be the main vehicle for implementing this policy and that unless the coding requires external development then there will be no need to specify what is to be carried out in a planning application.

Core Strategy Submission Document

S - 16928 - 10009 - Policy GB1 - Green Belt Protection - None

16928 Support

CHAPTER 6 Policy GB1 - Green Belt Protection

Summary: Policy GB1 - Green Belt

The objectives of this policy are supported, although as noted in other representations the SCS is unsound as it does not meet the tests in relation to justification, compliance with national policy or effectiveness of strategy.

Policy GB1 mentions the objective to allocate the minimum amount of Green Belt land necessary. The policy should link to the requirements of PPG2 and RSS which are discussed in relation to the representations on Policy H2 and H3. The policy should set out a timeframe for the review and why Rochford requires a Green Belt review (what the exceptional circumstances are in this District that justify a review of local boundaries. The policy should be amended to set out a 2031 time frame and this may require the SCS to have an extended life span beyond 2021.

We would recommend the deletion of the word character since Green Belt designation is not related to landscape character as currently drafted. For clarity we would also recommend that the Policy or its supporting text explain that a Green Belt review will take place in support of an allocations document (paragraph 6.6) in order to identify an appropriate new boundary. This is particularly necessary given the commitment to a Green belt review in the adopted Local Development Scheme.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 15884 - 5094 - Policy GB2 - Rural Diversification and Recreational Uses - None

15884 Object

CHAPTER 6 Policy GB2 - Rural Diversification and Recreational Uses

Respondent: Whirledge & Nott (Ms K Jennings) [5094]

Whirledge & Nott
The Black Barn
Lubards Lodge Farm
Hullbridge Road
Rayleigh
Essex
SS6 9QG

Agent: Whirledge & Nott (Ms K Jennings) [5094]

Whirledge & Nott
The Black Barn
Lubards Lodge Farm
Hullbridge Road
Rayleigh
Essex
SS6 9QG

Full Text: I consider that Policy GB2 is Unsound as it is inconsistent with national policy, namely Planning Policy Statement 7.

There is no statement within PPS7 that retail or residential developments are unacceptable forms of development in the countryside. Paragraph 17 of PPS7 states that "re-use for economic development purposes will usually be preferable, but residential conversions may be more appropriate in some locations and for some buildings" It is therefore inconsistent to prevent retail and residential development as acceptable forms of farm diversification. This restriction is over bearing and unnecessary in relation to re-use of buildings and rural diversification.

Summary: I consider that Policy GB2 is Unsound as it is inconsistent with national policy, namely Planning Policy Statement 7.

There is no statement within PPS7 that retail or residential developments are unacceptable forms of development in the countryside. Paragraph 17 of PPS7 states that "re-use for economic development purposes will usually be preferable, but residential conversions may be more appropriate in some locations and for some buildings" It is therefore inconsistent to prevent retail and residential development as acceptable forms of farm diversification. This restriction is over bearing and unnecessary in relation to re-use of buildings and rural diversification.

Change to Plan Revise the policy as follows,

Remove the words "small-scale" from first, second and third bullet points.
Delete "Retail (with the exception of farm shops) and residential development are not considered acceptable forms of rural development."

Appear at exam? No **Soundness Tests** None

Core Strategy Submission Document

S - 15979 - 13441 - Policy GB2 - Rural Diversification and Recreational Uses - None

15979 Support

CHAPTER 6 Policy GB2 - Rural Diversification and Recreational Uses

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: There appears to be some overlap between both Green Belt policies. There may be an opportunity to combine both into one policy with clear explanatory text.

Summary: There appears to be some overlap between both Green Belt policies. There may be an opportunity to combine both into one policy with clear explanatory text.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16041 - 14107 - Policy GB2 - Rural Diversification and Recreational Uses - None

16041 Support

CHAPTER 6 Policy GB2 - Rural Diversification and Recreational Uses

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: Relax "restrictive" concept with regard to diversification. Encourage re-use of empty unoccupied and redundant farm buildings. Actively encourage bed and breakfast and small scale hotels.

Summary: Relax "restrictive" concept with regard to diversification. Encourage re-use of empty unoccupied and redundant farm buildings. Actively encourage bed and breakfast and small scale hotels.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 15960 - 14146 - Policy URV1 - Upper Roach Valley - i, ii

15960 Object

CHAPTER 7 Policy URV1 - Upper Roach Valley

Respondent: Mr H Snell [14146]

Greensleeves
57 High Road
Hockley

SS5 4SZ

Agent: Capita Symonds (Mr David Spencer) [14145]

Capita Symonds
Elizabeth House
Walpole Loke
Dereham
Norfolk
NR19 1EE
England
01362656889

Full Text: The document as drafted is unsound as it appears to be neither justified or effective. There is insufficient detail in the document on the need for an additional policy to an area where a number of proposed Core Strategy policies apply and on this basis the policy deficit which would justify the need for Policy URV.1 is unclear. Additionally, it is unclear from the policy as to how the wider recreational and biodiversity objectives of the policy will be delivered, who will deliver them and when they will be delivered.

Summary: The document as drafted is unsound as it appears to be neither justified or effective. There is insufficient detail in the document on the need for an additional policy to an area where a number of proposed Core Strategy policies apply and on this basis the policy deficit which would justify the need for Policy URV.1 is unclear. Additionally, it is unclear from the policy as to how the wider recreational and biodiversity objectives of the policy will be delivered, who will deliver them and when they will be delivered.

Change to Plan Policy URV.1 should be deleted as it is neither justified or effective. If it is retained it should be amended to include a spatial commitment from the Council to review / delineate an area to which this policy applies. It should also be amended to identify which Development Plan Document will be the key delivery mechanism for this policy and this should be cross-referenced to the Monitoring and Implementation Framework (MIF). The implementation section of the MIF should comprehensively include landowners (upon whom delivery is critical) and further detail on the process and additional strategies the Council will use to justify CPO action.

Appear at exam? No

Soundness Tests i, ii

Core Strategy Submission Document

S - 16042 - 14107 - Policy URV1 - Upper Roach Valley - None

16042 Support

CHAPTER 7 Policy URV1 - Upper Roach Valley

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: This area should be preserved as the "Green Lung". The area surrounding the Cherry Orchard Park should be preserved as green belt. Access to the park remains a serious concern for residents of Rochford District. It seems incongruous that there is a plan to build 600 dwellings and a school in West Rochford being so close to the country park. How does this equate to the concept of the country park?

Summary: This area should be preserved as the "Green Lung". The area surrounding the Cherry Orchard Park should be preserved as green belt. Access to the park remains a serious concern for residents of Rochford District. It seems incongruous that there is a plan to build 600 dwellings and a school in West Rochford being so close to the country park. How does this equate to the concept of the country park?

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16850 - 9889 - Policy URV1 - Upper Roach Valley - None

16850 Support

CHAPTER 7 Policy URV1 - Upper Roach Valley

Respondent: Environment Agency (Miss Carrie Williams) [9889] **Agent:** N/A

Environment Agency
Iceni House
Cobham Road
Ipswich
Suffolk
IP3 9JD
United Kingdom
01473 706007

Full Text: Support

Summary: Support

Change to Plan N/A

Appear at exam? No **Soundness Tests** N/A

Core Strategy Submission Document

O - 15740 - 7446 - Wallasea Island, 7.9 - iii

15740 Object

CHAPTER 7 Wallasea Island, 7.9

Respondent: Steven Abbott Associates North Quarry Office (Mr A Skelton) [7446] **Agent:** N/A

Steven Abbott Associates North Quarry Office
North Quarry Business Park
Appley Bridge
Wigan
Lancashire
WN6 9DB
01257 251177

Full Text: Whilst the existence of Essex Marina is explicitly recognised there is no mention of Baltic Wharf and associated storage facilities (which lie alongside the Essex Marina). In physical and visual terms Baltic Wharf is more substantial and significant. Indeed the Wharf and storage facility was identified in the Richfird District Replacement Local Plan as major developed site in the Green Belt. That recognition and identification should be carried forward. The redevelopment potential of the wharf site (as per PPG2 Annex C) should be recognised.

Summary: Whilst the existence of Essex Marina is explicitly recognised there is no mention of Baltic Wharf and associated storage facilities (which lie alongside the Essex Marina). In physical and visual terms Baltic Wharf is more substantial and significant. Indeed the Wharf and storage facility was identified in the Richfird District Replacement Local Plan as major developed site in the Green Belt. That recognition and identification should be carried forward. The redevelopment potential of the wharf site (as per PPG2 Annex C) should be recognised.

Change to Plan Additional text recognising the existence of Baltic Wharf and associated areas as an existing substantial and major developed site.
Additional text (cross referenced to the Green Belt section regarding the application of national policy in PPG2 Annex C). The redevelopment framework for the site should be recognised in the context of future expansion of the marina based facilities but including a broad range of developments and land uses.

Appear at exam? No **Soundness Tests** iii

Core Strategy Submission Document

O - 15741 - 7446 - Policy URV2 - Wallasea Island - iii

15741 Object

CHAPTER 7 Policy URV2 - Wallasea Island

Respondent: Steven Abbott Associates North Quarry Office (Mr A Skelton) [7446] **Agent:** N/A

Steven Abbott Associates North Quarry Office
North Quarry Business Park
Appley Bridge
Wigan
Lancashire
WN6 9DB
01257 251177

Full Text: The policy implies that all of the Wallasea Island area is of prime value for bird and other nature conservation interests. We fully recognise for specific areas to be protected and improved to enhance biodiversity. However, it would be inappropriate for the policy not to also recognise and seek to balance other legitimate land uses and interests that are well established on Wallasea Island - e.g. Baltic Wharf etc.

Summary: The policy implies that all of the Wallasea Island area is of prime value for bird and other nature conservation interests. We fully recognise for specific areas to be protected and improved to enhance biodiversity. However, it would be inappropriate for the policy not to also recognise and seek to balance other legitimate land uses and interests that are well established on Wallasea Island - e.g. Baltic Wharf etc.

Change to Plan A more balanced policy incorporating wording which reflects other existing land uses and interests which must continue to be accommodated - as must any future changes or developments that would be consistent with other national planning policy e.g PPG2 Annex C relating to major developed sites in the Green Belt

Appear at exam? Yes **Soundness Tests** iii

Core Strategy Submission Document

S - 16043 - 14107 - Policy URV2 - Wallasea Island - None

16043 Support

CHAPTER 7 Policy URV2 - Wallasea Island

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: Road improvements and facilities needed. How will people access this facility? It appears there are no plans for road improvements. No facilities available until 2020. This is poorly thought out and needs urgent further consideration.

Summary: Road improvements and facilities needed. How will people access this facility? It appears there are no plans for road improvements. No facilities available until 2020. This is poorly thought out and needs urgent further consideration.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16851 - 9889 - Policy URV2 - Wallasea Island - None

16851 Support

CHAPTER 7 Policy URV2 - Wallasea Island

Respondent: Environment Agency (Miss Carrie Williams) [9889] **Agent:** N/A

Environment Agency
Iceni House
Cobham Road
Ipswich
Suffolk
IP3 9JD
United Kingdom
01473 706007

Full Text: Support

Summary: Support

Change to Plan N/A

Appear at exam? No **Soundness Tests** N/A

Core Strategy Submission Document

O - 15866 - 12083 - Environmental Issues - i, ii

15866 Object

CHAPTER 8 Environmental Issues

Respondent: Mr Paul Sealey [12083]

Agent: N/A

Kirrin,
Hockley Rise,
Hockley
SS5 4PT
United Kingdom
01702206888

Full Text: This seems to be a 'text book' set of issues driven by legislation and lobby groups. However, there is no consideration of the future of, for example, farming or market gardening. It seems distinctly possible that there will be a growing (pardon the pun) demand for local produce to combat the effects of climate change and long distant transport of food. How will the strategy deal with that?

Summary: This seems to be a 'text book' set of issues driven by legislation and lobby groups. However, there is no consideration of the future of, for example, farming or market gardening. It seems distinctly possible that there will be a growing (pardon the pun) demand for local produce to combat the effects of climate change and long distant transport of food. How will the strategy deal with that?

Change to Plan Step back from the text book and consider other things that are likely to happen during the life of the Strategy. Then decide how the strategy will provide solutions.

Appear at exam? No

Soundness Tests i, ii

Core Strategy Submission Document

O - 16031 - 14146 - Vision - i, ii, iii

16031 Object

CHAPTER 8 Vision

Respondent: Mr H Snell [14146]

Greensleeves
57 High Road
Hockley

SS5 4SZ

Agent: Capita Symonds (Mr David Spencer) [14145]

Capita Symonds
Elizabeth House
Walpole Loke
Dereham
Norfolk
NR19 1EE
England
01362656889

Full Text: The document does not refer to any preliminary Habitat Regulation Assessment (HRA) work and there is no acknowledgement of an HRA on the Council's website and or from speaking to the Council's Planning Policy team. In the absence of any initial HRA work and given the proximity of growth locations to the SPA and SAC sites in Rochford at this late stage of the document preparation, it is questionable that the strategy can be delivered. Can the proposed strategy (in particular policies H2 and H3) be delivered without an adverse affect on European Habitats?

Summary: The document does not refer to any preliminary Habitat Regulation Assessment (HRA) work and there is no acknowledgement of an HRA on the Council's website and or from speaking to the Council's Planning Policy team. In the absence of any initial HRA work and given the proximity of growth locations to the SPA and SAC sites in Rochford at this late stage of the document preparation, it is questionable that the strategy can be delivered. Can the proposed strategy (in particular policies H2 and H3) be delivered without an adverse affect on European Habitats?

Change to Plan The document should not be submitted without either an HRA or a statement from Natural England that an Assessment is not required in accordance with Regulations 85A and 85B of the associated European Habitats Directive. The absence of any information on HRA at this late stage of the document preparation makes it difficult to assess or comment on the deliverability or otherwise of this document, and ultimately its soundness. On this basis the document could be unsound without this necessary evidence, particularly given the emphasis on growth locations adjacent to the Crouch Estuary and Foulness SPAs and the Crouch Estuary SAC. A more precautionary approach would be to direct growth to those sustainable locations remote from the SPAs and SACs such as Hockley.

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16379 - 8267 - Vision - iii

16379 Object

CHAPTER 8 Vision

Respondent: Aber Ltd [8267]

Aber Ltd
C/o Agent

Agent: Colliers CRE (Mr S Chapman) [8266]

Colliers CRE
9 Marylebone Lane
London
W1U 1HL
020 7344 6533

Full Text: Vision

By 2017 - the fourth bullet point states that strategically located and planned developments are predominately situated within areas least at risk from flooding

PPS25 advises that the key aim of managing risk would seek to only permit development in areas of flood risk when there are no reasonable available sites in areas of lower flood risk.

The sequential test should be used to demonstrate that the land developed is the lowest possible risk and the exception test should only be used when it has been demonstrated that there are no available sites available on sites in lower risk areas.

The Core Strategy advises that there are available sites in lower risk areas, therefore, this proposal would be contrary to PPS25.

Amend text of the second sentence of fourth bullet:

â€œ '... These strategically located and planned developments are situated within areas least at risk from flooding.'

Summary: Vision

By 2017 - the fourth bullet point states that strategically located and planned developments are predominately situated within areas least at risk from flooding

PPS25 advises that the key aim of managing risk would seek to only permit development in areas of flood risk when there are no reasonable available sites in areas of lower flood risk.

The sequential test should be used to demonstrate that the land developed is the lowest possible risk and the exception test should only be used when it has been demonstrated that there are no available sites available on sites in lower risk areas.

The Core Strategy advises that there are available sites in lower risk areas, therefore, this proposal would be contrary to PPS25.

Change to Plan

Amend text of the second sentence of fourth bullet:

â€œ '... These strategically located and planned developments are situated within areas least at risk from flooding.'

Appear at exam? No

Soundness Tests iii

Core Strategy Submission Document

S - 15980 - 13441 - Objectives - None

15980 Support

CHAPTER 8 Objectives

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: An objective to 'improve' air quality might be more accurate. It is unclear what 'negative impact' is experienced or anticipated.

Summary: An objective to 'improve' air quality might be more accurate. It is unclear what 'negative impact' is experienced or anticipated.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16047 - 14107 - Objectives - None

16047 Support

CHAPTER 8 Objectives

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: With regard to Item 3, we have concerns that insufficient attention has been paid to the issue of flooding. More detail is required on flood mitigation measures.

Summary: With regard to Item 3, we have concerns that insufficient attention has been paid to the issue of flooding. More detail is required on flood mitigation measures.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 15981 - 13441 - Introduction, 8.3 - None

15981 Support

CHAPTER 8 Introduction, 8.3

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: The Council's recognition of the need to address climate change, and the role of planning, is welcome.

Summary: The Council's recognition of the need to address climate change, and the role of planning, is welcome.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 15952 - 10849 - Historical and Archaeological Sites, 8.15 - None

15952 Support

CHAPTER 8 Historical and Archaeological Sites, 8.15

Respondent: Canewdon Parish Council (Mrs Kelly Holland)
[10849]
Canewdon Parish Council
33 Rowan Way
Canewdon
Essex
SS4 3PD

Agent: N/A

Full Text: Please include Canewdon as there are many bronze age and roman sites in the parish.

Summary: Please include Canewdon as there are many bronze age and roman sites in the parish.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16117 - 14160 - Historical and Archaeological Sites, 8.15 - i

16117 Object

CHAPTER 8 Historical and Archaeological Sites, 8.15

Respondent: Cllr Chris Black [14160]

56 Love Lane
Rayleigh
Essex
SS67DX

Agent: N/A

Full Text: This section does not recognise the archaeological (especially early Saxon) heritage of West Rayleigh / Rawreth..

Summary: This section does not recognise the archaeological (especially early Saxon) heritage of West Rayleigh / Rawreth..

Change to Plan Other, smaller, brownfield sites could be used as an alternative to 'land North of London Road'

Appear at exam? Yes

Soundness Tests i

Core Strategy Submission Document

O - 16698 - 9072 - Historical and Archaeological Sites, 8.15 - i

16698 Object

CHAPTER 8 Historical and Archaeological Sites, 8.15

Respondent: Essex County Council (Mr Roy Lewis) [9072] **Agent:** N/A

Essex County Council
ESH - Spatial Planning
Planning and Transport
County Hall
Chelmsford
CM1 4JU
01245-437578

Full Text: ROCHFORD CORE STRATEGY SUBMISSION DOCUMENT, SEPTEMBER 2009
RESPONSE OF ESSEX COUNTY COUNCIL

1. General Comment

Essex County Council welcomes and broadly supports the Core Strategy prepared by Rochford District Council. The Strategy contains policies and proposals that address the spatial characteristics, issues and opportunities facing the District whilst respecting the distinctive qualities of the different settlements and parts of the District.

The County Council fully supports the maintenance of a strong policy approach to protection of the Green Belt and of the quality of environmental assets in the District whilst making adequate housing and employment provision within the District. The Core Strategy presents an approach that emphasises a balance of opportunity through the District and recognition of emerging economic prospects in the District and neighbouring areas. The intended preparation of more detailed Action Area Plans for London Southend Airport and its environs and for each of the three town centres of Rayleigh, Rochford and Hockley will further enhance the approach of the Core Strategy. The emphasis on the three town centres is particularly welcomed as offering a stimulus to improvement in the services and facilities available locally within the District whilst also affording possibilities of increased community focus.

2. Housing Distribution and Locations

The East of England Plan requires Rochford to provide a minimum of 3,790 additional dwellings between 2006 and 2021. In addition, provision for a further 1,000 dwellings should be made between 2021 and 2025 to ensure delivery of housing for at least 15 years from adoption of the Core Strategy (expected in 2010). Of this total requirement the District Council has identified a capacity of 2,000 dwellings through a Strategic Housing Land Availability Assessment. This means that the Core Strategy has to identify locations for about 1,750 dwellings to be delivered before 2021 and a further 1,000 dwellings between 2021 and 2025.

Policy H1 (The efficient use of land for housing) is supported. However, prioritisation of the reuse of previously developed land within settlements for additional housing is unlikely to provide a sufficient source of provision due to the generally residential nature of existing settlements in the district and the absence of potentially large sites of previously developed land. The assessment of potential for additional housing provision within settlements already includes the proposed re-allocation to substantially residential use of 4 existing employment areas.

Within Policy H2 (Extensions to residential envelopes and phasing) and Policy H3 (Extension to residential envelopes post-2021) the District Council has adopted a balanced approach to the distribution of additional housing locations, which is based on identification of tiers of settlements defined by reference to their accessibility to jobs, services and facilities (some of which lie outside the District) and the need to protect the valued environments within the District. This approach is generally supported, although implementation and delivery of individual schemes should give further thought to securing sustainable functional relationships between proposed development locations and availability of jobs, services and facilities.

The proposed scale and phasing of development at each of the identified locations in Policy H2 and Policy H3 should be capable of being supported by County Council service groups, provided that adequate and timely funding is available. The County Council would wish to work with the District Council to ensure that future infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

3. Economic Development

The approach to Employment Growth (Policy ED1) is supported. Given the economic structure of Rochford District the support to be given to protection and enhancement of the role of small and medium sized businesses; enhancement of the District's commercial centres; and development of a skills training academy is particularly welcome. These measures will assist in building on the existing economic resource of the District.

Proposals for the comprehensive development of London Southend Airport and its environs (Policy ED2) are supported.

Core Strategy Submission Document

16698 Object

CHAPTER 8 Historical and Archaeological Sites, 8.15

The further elaboration of proposals through an Area Action Plan will provide a firm foundation to realise the economic regeneration and growth opportunities presented by effective use of the Airport. The recognition of the potential environmental impact of the Airport and the commitment to work to mitigate any adverse impacts on the environment and local amenities is fully supported.

The location of the proposed Eco-Enterprise Centre to the North of London Southend Airport (Policy ED4) is supported. Creation of the Centre would assist reduction of the rate of business start-up failure in the district. Further the proposed location for the Centre would afford a clear offer to businesses within an area of varied business activity.

The continued protection and enhancement of existing employment land (Policy ED3) is supported, as is the identification of 4 existing employment sites for appropriate alternative, substantially residential, uses. Each of the 4 sites affords particular issues and opportunities whereby their redevelopment for other uses and relocation of existing occupiers would confer advantage for the immediately neighbouring areas and for the District as a whole.

4. Town Centres

The town centres of Rayleigh, Rochford and Hockley, and future plans for them, are closely linked to the economic development of the District but also present the opportunity to offer greater community focus within the District. The varied approach being taken to each of these town centres is supported (Policy RTC4, RTC5 and RTC6), notably the recognition of the role and purpose of the town centres beyond retail uses.

The contribution that the County Library service could make to plans for the town centres should not be overlooked. The 5 libraries in the District are substantial footfall draws in their localities and act as a 'community anchor store'. This has knock-on effects in encouraging use of neighbouring retail and service facilities. Further the Library service is currently looking at co-location opportunities for other services within the libraries which would enable them to act as a community focus.

5. Transport

The transport aspects of the Core Strategy are well balanced in identifying potential measures that would meet the needs of existing residents and businesses in the District as well as needs arising from future development. The approach reflects and makes good reference to the transportation aspirations of the County Council. The policy emphasis on close working between the District Council and the County Council to advance the transport aspirations is welcomed and fully supported.

In relation to parking standards (Policy T8 and Paragraph 10.30) the review undertaken by Essex County Council in conjunction with the Essex Planning Officers Association has now been completed. Revised parking standards have been agreed and signed off as County Supplementary Guidance, in accordance with PPS12, and is being applied by the County Council as Local Highways Authority.

6. Coastal Protection Belt

Policy ENV2 (Coastal Protection Belt) is not supported because in its current form it is not a suitable or effective replacement policy for Policy CC1 of the Replacement Structure Plan. Structure Plan Policy CC1 (The Undeveloped Coast - Coastal Protection Belt) currently remains a 'saved' policy of the Essex and Southend-on-Sea Replacement Structure Plan, April 2001 (following a direction of the Secretary of State, dated 27th September 2007, under paragraph 1(3) of Schedule 8 to the Planning and Compulsory Purchase Act 2004). The existing Policy CC1 reads, 'Within the Coastal Protection Belt defined in adopted local plans there shall be the most stringent restrictions on development within the rural and undeveloped coastline situated outside existing built-up areas, and any development which is exceptionally permitted within this Belt shall not adversely affect the open and rural character, historic features or wildlife.'

Core Strategy Policy ENV2 should be revised to include specific reference to,

- * Definition of the boundary of the Coastal Protection Belt in another Development Plan Document;
- * the application of the most stringent restrictions on development within the rural and undeveloped coastline;
- * any development exceptionally permitted not adversely affecting the open and rural character, historic features or wildlife.

7. Historic Environment

The importance of the historic environment in Rochford District is clearly identified within the Core Strategy document. Nevertheless, the policy guidance could be usefully enhanced to promote consideration and enhancement of the historic environment and use of the historic environment to shape place. This would be achieved by the following amendments to the Core Strategy,

- * Policy ENV1 (Protection and Enhancement of the Natural Landscape and Habitats and the Protection of Historical and Archaeological Sites) should be amended by deletion of the final sentence and its replacement with, The Council is committed to the protection, promotion and enhancement of the diverse historic landscape and extensive surviving archaeological deposits of the District.

16698 Object

CHAPTER 8 Historical and Archaeological Sites, 8.15

* Paragraph 8.15 of the supporting text should be amended to better support the suggested amendment to Policy ENV1. The existing text of Paragraph 8.15 should be deleted in its entirety and replaced by,
The historic environment of Rochford District has developed through a history of human activity that spans over 450,000 years. Much of the resource lies hidden beneath the ground in the form of archaeological deposits. Other elements such as the historic landscape, the pattern of field, farms, woods and grazing marsh which characterise the District, are a highly visible record of millennia of agriculture, industry and commerce. Of particular significance are the coastal, island and estuarine areas where multi-period landscapes reflecting the exploitation of coastal and marshland resource survive. The District also includes the important historic medieval market towns of Rochford and Rayleigh.

* Page 16 (Sustainable Community Strategy Priority: Promoting a Greener District) should be amended to further support the approach to the Historic Environment. The fourth bullet of the Key Section/Policies of the Core Strategy should be amended to include the word 'historic', so that the first sentence of the bullet would read,
The Environment chapter seeks to protect and enhance the biodiversity, historic and natural environment of the District by protecting sites of local, national and international importance.

8. Community Infrastructure

The approach to Community Infrastructure is supported. The County Council would wish to work with the District Council to ensure that future community infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

In addition, it should be noted that,

* Some County Council services are not highly visible despite being regarded as highly desirable community services by local residents. The need to ensure adequate funding and contributions to enable these services to meet community expectations should be recognised and acknowledged in consideration of planning obligations and standard charges.

* The Adult Community Learning Centre at Rocheway, Rochford could be better located with regard to the wider Rochford/Castle Point area of service. Relocation of the Centre could provide opportunities both at the new location and for the current site.

* The Core Strategy should make specific reference to,

o Appendix H1, Location at South Canewdon: new Early Years and Childcare facilities;

o Policy CLT2, final sentence: insert after the words 'primary schools' the words 'and Early Years and Childcare facilities';

o Appendix CLT1, Other issues/comment: for Early years and childcare facilities add 'Land to be allocated within new residential areas, as appropriate'.

9. Implementation, Delivery and Monitoring

The inclusion in the Core Strategy of a section considering Implementation, Delivery and Monitoring is welcomed and supported. Nevertheless, the District Council, in moving towards implementation and delivery of the individual elements of the Core Strategy, should highlight those schemes and projects that are critical to achievement of other aspects of the Strategy.

Further, the monitoring proposal for Policy H6 (Lifetime Homes) and for Policy CP1 (Design) should be amended,

* Policy H6 (Lifetime Homes) - the identified monitoring tool is Core Indicator H6 Housing Quality Building for Life Assessments. The Building for Life Assessment methodology was devised to measure the overall design/layout quality of housing developments. It was not devised to measure compliance with Lifetime Homes, which is largely, but not exclusively, concerned with internal space standards and the provision of internal arrangements within dwellings to meet needs of all residents.

* Policy CP1 (Design) - the monitoring indicator proposed by the Core Strategy is not supported because it is unclear what the indicator would actually be measuring. The proposed indicator should be replaced by the Core Indicator, Housing Quality - Building for Life Assessments, as suggested by the County Council in its response to the Core Strategy Preferred Options, October 2008. A better approach would be to base evaluation and monitoring of Policy CP1 on the Commission for Architecture and the Built Environment's (CABE) 20 Building for Life principles, particularly as Government has endorsed these principles and is urging local authorities to use them to assess design quality. It is suggested that the monitoring arrangements for Preferred Option CP1 be deleted and replaced by the following text, 'The success of the implementation of this policy will be monitored by assessing schemes, or an appropriate sample of schemes, against the Commission for Architecture and the Built Environment's (CABE) Building for Life principles.'

10. Access to Housing

The Core Strategy notes the higher prevalence of older people in Rochford District and the need to support them. However, a more broadly based approach to access to housing should be adopted by Policies H4, H5 and H6. It should recognise the presence of other vulnerable adults in the community, for example, those with learning or mental health disability, and the range of possible forms of accommodation, including supported, sheltered and extra care accommodation. The high level of owner occupation in the District further emphasises the need for a broader approach. The emphasis on Lifetime Homes would not address the variety of future needs, whilst the potential exemptions to the

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Summary:	<p>Lifetime Homes policy standard in Policy H6 are likely to act against demographic trends.</p> <p>The importance of the historic environment in Rochford District is clearly identified within the Core Strategy document. Nevertheless, the policy guidance could be usefully enhanced to promote consideration and enhancement of the historic environment and use of the historic environment to shape place. This would be achieved by the following amendments to the Core Strategy,</p>
Change to Plan	<p>Paragraph 8.15 of the supporting text should be amended to better support the suggested amendment to Policy ENV1. The existing text of Paragraph 8.15 should be deleted in its entirety and replaced by,</p> <p>The historic environment of Rochford District has developed through a history of human activity that spans over 450,000 years. Much of the resource lies hidden beneath the ground in the form of archaeological deposits. Other elements such as the historic landscape, the pattern of field, farms, woods and grazing marsh which characterise the District, are a highly visible record of millennia of agriculture, industry and commerce. Of particular significance are the coastal, island and estuarine areas where multi-period landscapes reflecting the exploitation of coastal and marshland resource survive. The District also includes the important historic medieval market towns of Rochford and Rayleigh.</p>
Appear at exam?	Not Specified
Soundness Tests	i

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Full Text: ROCHFORD DISTRICT COUNCIL - LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY SUBMISSION
SEPTEMBER 2009

Icen Projects Ltd (Icen) has been instructed by Colonnade Land LLP (Colonnade) to submit representations to the Rochford Local Development Framework Core Strategy Submission (CSS).

a) Overview

It is our conclusion that the CSS is not justified, effective or consistent with national policy, as required by Planning Policy Statement 12: Creating Strong Safe and Prosperous Communities through Local Spatial Planning (PPS12) and is therefore vulnerable to being found unsound by an Inspector through the Examination in Public.

b) Background and Summary

These representations follow those made by Icen on behalf of Colonnade to the Preferred Options Core Strategy, submitted via letter dated 17 December 2008. In this regard, we would request that the Council confirms that the representations made to the Preferred Options Core Strategy will be taken into account alongside the current representations, particularly as there are a number of cross references between the two sets of representations.

It is not considered necessary to reiterate the content of the previous representations, as they were made at the appropriate stage and will be considered by the Planning Inspectorate in due course, but it is inevitable that certain elements will require restating where it is not clear that they have been taken into account in the production of the CSS. For clarity, therefore, Colonnade feel that it is appropriate to clarify the 'in-principle' issues that were raised in the representations to the Preferred Options Core Strategy, recognising that these issues were raised in the context of a wider and more coherent justification made within the representations:

- â€¢ Further cross-referencing of the recommendations made within the evidence base is required;
- â€¢ Greater focus should be placed on promoting Rochford as the principal settlement within the District;
- â€¢ Coombes Farm is the most logical location for residential development abutting the urban area of Rochford and as such warrants recognition as a general location for residential development;
- â€¢ The allocation of Three Ashes Farm for employment generating uses will be pursued;
- â€¢ Recognition that it is not realistic to expect residential allocations to be met mainly on Brownfield sites, nor should the intensification of smaller sites in residential areas be pursued;
- â€¢ Many of the sites identified as suitable for residential development will not be viable and will not come forward for development within the timescales anticipated;
- â€¢ The failure to provide the necessary justification for the proposed infrastructure improvements sought in Appendix H1;
- â€¢ The inclusion of an affordable housing exception policy was sought; and
- â€¢ The need to identify sites capable of delivering employment growth in the short term.

Following assessment of the CSS presented by the Council for consultation prior to submission to the Secretary of State, Colonnade considers the Plan to be 'unsound' as the document consistently fails to meet the tests of soundness set out in the table following Paragraph 4.52 of PPS12. For clarity, PPS12 confirms that to be 'sound' a Core Strategy should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY and defines 'justified' as "founded on a robust and credible evidence base" and "the most appropriate strategy when considered against the reasonable alternatives" and 'effective' as "deliverable", "flexible" and "able to be monitored".

The rationale for the above is identified in the remainder of these representations, which are provided in the interests of ensuring the Council delivers a strong, robust and logical Core Strategy that guides the future development of the District in a justified and effective manner.

b) Colonnade

As the Council is aware from previous submissions to the Local Development Framework, Colonnade is a strategic land company with a particular interest in the future development of the District as a consequence of a number of sites that it controls, particularly around Rochford.

The Council will also be aware that Colonnade has recently submitted an outline planning application for the residential development of the land at Coombes Farm, Rochford to provide a sustainable urban extension comprising up to 326

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residential dwellings, with associated accesses and community uses. Whilst the planning application process is clearly separate from the Local Development Framework production process, Colonnade wishes to continue the promotion of the site as a suitable location for residential development.

Accordingly, these representations focus on the legal requirements and tests of soundness associated principally with the Housing and Employment chapters of the CSS, with reference where appropriate to the sites that are controlled by Colonnade, the outline planning application at Coombes Farm and other issues where relevant.

c) Housing

i. Date of Adoption

The CSS assumes an adoption date of 2010 and plans for the provision of housing to 2025.

Taking account of the potential delays to the adoption of the Plan, including the Examination process, it would be more appropriate for the CSS to provide sufficient flexibility to allow for delays in its adoption. Colonnade considers an adoption date of 2011 for the CSS is a more realistic target.

Taking account of the advice in Paragraph 4.13 of PPS12, which states that the time horizon for the Core Strategy should be "at least 15 years from the date of adoption" it would be appropriate for the CSS to plan for the provision of housing to 2026 at the earliest. As such, Colonnade does not consider the CSS to be 'flexible' in the context of the tests of soundness in the table following Paragraph 4.52 of PPS12.

ii. Housing Delivery

However, setting the above aside, the Housing Chapter identifies the minimum housing delivery target for the period 2001 to 2021 of 4,600 dwellings as set out in the East of England Plan, with the annual average requirement of 250 dwellings per annum to extend provision from 2021 to 2025. It also confirms that the residual target for the period 2006 to 2021 is 3,790 dwellings, taking account of the delivery of 810 dwellings in the period 2001 to 2006, and a further 618 dwellings have been completed between 2006 and 2008.

This leaves a residual housing provision target of a minimum of 3,172 dwellings in the period 2008 to 2021. Taking into account the required provision beyond 2021, the residual housing provision target in the period 2008 to 2025 is a minimum of 4,172 dwellings. The disparity between these figures and those provided within the CSS are explained by the rounding down of the annual average delivery requirement in the period 2006 to 2021 to 250 dwellings per annum, compared with the actual figure of 252.67.

The table at Paragraph 4.6 of the CSS identifies the source of housing provision that will meet the identified minimum requirements and includes figures for 'Extant Planning Permissions' and 'Existing allocations/other appropriate sites identified in Strategic Housing Land Availability Assessment'. These figures, along with the actual completions within the period are combined to produce the figure for the 'Total without Green Belt release' figure.

Setting aside the concern regarding under-provision associated with the rounding down of the annual average delivery requirement in the period 2006 to 2021, the CSS fails to identify the sites that will contribute to the 'Extant Planning Permissions' provision. The identification of the sites that will contribute to the 'Extant Planning Permissions' should be provided in the context of the findings of the Inspector in the appeal by Asprey Homes [APP/G5180/A/07/2043219/NWF] who determined that the reliance on a delivery rate of 100% is unsafe [IR287].

Furthermore, at the time of writing these representations, the Strategic Housing Land Availability Assessment 2009 has not been published. It is impossible therefore for a full assessment of the proposed housing provision to be undertaken to confirm whether the CSS is 'founded on a robust and credible evidence base' [test of soundness in the table following Paragraph 4.52 of PPS12].

iii. Redevelopment of Employment Sites

Paragraph 4.14 of the CSS refers to the identification of the four employment sites that are considered by the Council to be suitable for redevelopment to residential use. However, the failure to publish the Strategic Housing Land Availability Assessment 2009 either before or alongside the publication of the CSS means that the assumptions made by the Council as to the suitability, availability, viability and deliverability of the sites cannot be assessed.

It has been necessary, therefore, to review the assumptions made in the Rochford Urban Capacity Study 2007 (UCS) regarding the sites. Within the section of the UCS entitled 'Redevelopment of Established Employment Land' [pages 22 & 23] includes a list of those sites assessed, their indicative capacities and the probability of residential development coming forward at the sites within the plan period (identified elsewhere as 2001 - 2021). The list includes the four sites identified in the CSS of Eldon Way/Foundry Estate, Hockley; Rawreth Lane Industrial Estate, Rayleigh; Stambridge Mills; and Star Lane Industrial Estate, Great Wakering.

In total, the UCS identifies an indicative residential redevelopment capacity of 486 units on the four sites (118, 220, 60 and 88 respectively). Of these, it identifies the Rawreth Lane Industrial Estate and Stambridge Mills as having a 'high'

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probability of coming forward for development in the Plan period (2001 - 2021), which would deliver 280 residential dwellings using the Council's own figures. The Star Lane Industrial Estate (referred to in the UCS as the Star Lane Brickworks) is identified as having a 'medium' probability of coming forward for development in the Plan period, with capacity to deliver 88 residential dwellings. It is unclear, therefore, where the figure for 'Existing allocations/other appropriate sites identified in Strategic Housing Land Availability Assessment'.

Set against this is the identification of these four sites in the CSS as being capable of delivery for residential development within the Plan period, with 671 units delivered between 2006 and 2015 and a further 506 units between 2015 and 2021.

The UCS also states in the same section that:

"There are considerable areas of land in the district that are currently allocated for, and in use as, employment land. The redevelopment of such sites for residential use would reduce demand for residential development on greenfield sites, but would at the same time create a need for alternative sites to be found for employment. Such an approach, which would be likely to require the decontamination of existing employment land to make it fit for residential use, together with development of a greenfield site and implementation of additional infrastructure to serve the new employment area, may well be unsustainable." [our emphasis]

The UCS appears to confirm therefore, that not only would the redevelopment of the four sites listed in the CSS be unlikely within the Plan period, but also potentially unsustainable. In this regard, it is notable that the promoters of Stambridge Mills sought the Screening Opinion of the Council as to whether Environmental Impact Assessment of the planning application for the redevelopment of the site for residential use was required in 2007, but to date are yet to submit a planning application for the redevelopment of the site.

In light of this, Colonnade does not consider the CSS is 'the most appropriate strategy when considered against the reasonable alternatives' [test of soundness in the table following Paragraph 4.52 of PPS12], which include the provision of residential development in East Rochford.

iv. Strategic Housing Growth to the East of Rochford

Furthermore, whilst paragraph 2.62 of the CSS identifies concern relating to the identification of locations to the east of Rochford for development on the basis that 'vehicular movements would inevitably be directed through Rochford's historic core', the CSS later identifies Stambridge Mills as a suitable site for residential redevelopment.

In light of the evident conflicts between the evidence base provided in support of the CSS and the absence of other evidence, the CSS is not considered 'sound' in the context of the tests of soundness in the table following Paragraph 4.52 of PPS12.

v. Housing Trajectory

Paragraph 4.28 of the CSS confirms that policies H1, H2 and H3 of the CSS will deliver housing supply as illustrated in the Housing Trajectory at Appendix H2. This Housing Trajectory is transposed from the 2008 Annual Monitoring Report (AMR).

Whilst on the face of it, the Housing Trajectory appears to confirm that the Council can meet its requirement to identify a five year housing supply, many of the sites identified within the AMR do not conform to the guidance issued by CLG in August 2008, on the assessment of a five year land supply. The guidance identifies sites that can be included within the five year assessment of housing supply as:

"those that are allocated for housing in the Development Plan, sites that have planning permission (outline or full planning permission that has not been implemented) and specific, unallocated brownfield sites that have the potential to make a significant contribution to housing delivery during the 5 year period".

Table 4.10: Projected Net Completions of the AMR confirms that the five year housing land supply figure includes sites from 'other land allocated for residential purposes', which are based on land allocations outside existing settlements. However, it should be clarified that these land allocations are not currently allocated for housing development in an adopted Development Plan. As such, these unallocated greenfield sites that are yet to make significant progress through the planning system should be discounted and the five year housing land supply recalculated.

The table below has been prepared to confirm the extent of the shortfall should the sites from 'other land allocated for residential purposes' be removed from the calculation of the Rochford five year housing land supply, in accordance with the guidance issued by CLG:

Recalculated Five Year Housing Land Supply (2009 - 2014):

Year
1st April 2009 to 31st March 2010
Predicted Delivery (A)

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106 dwellings
Allocations on 'other land allocated for residential purposes' (B)
0
Residual delivery (A-B)
106 dwellings
Delivery Shortfall
0

Year
1st April 2010 to 31st March 2011
Predicted Delivery (A)
217 dwellings
Allocations on 'other land allocated for residential purposes' (B)
150
Residual delivery (A-B)
67 dwellings
Delivery Shortfall
150

Year
1st April 2011 to 31st March 2012
Predicted Delivery (A)
544 dwellings
Allocations on 'other land allocated for residential purposes' (B)
300
Residual delivery (A-B)
244 dwellings
Delivery Shortfall
300

Year
1st April 2012 to 31st March 2013
Predicted Delivery (A)
395 dwellings
Allocations on 'other land allocated for residential purposes' (B)
375
Residual delivery (A-B)
20 dwellings
Delivery Shortfall
375

Year
1st April 2013 to 31st March 2014
Predicted Delivery (A)
300 dwellings
Allocations on 'other land allocated for residential purposes' (B)
300
Residual delivery (A-B)
0 dwellings
Delivery Shortfall
300

TOTAL

Predicted Delivery (A)
1,562 dwellings

Allocations on 'other land allocated for residential purposes' (B)
1,125 dwellings

Residual delivery (A-B)
437 dwellings

Delivery Shortfall
1,125 dwellings

The above table confirms that the removal of the 'other land allocated for residential purposes' from the calculation of the Rochford five year housing land supply leaves the Council with a minimum net additional housing delivery of 437 dwellings, which equates to a supply of 1.7 years based on the adjusted annual delivery target of a minimum of 255 net

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additional dwellings per annum. As such, the Council is failing to meet its requirement to demonstrate a five year housing land supply in accordance with PPS3 and the supporting guidance provided by CLG. It is notable that the recent application by David Wilson Homes at Land between Main Road and Rectory Road and Clements Hall Way, Hawkwell identifies an even greater shortfall in the Council's five year housing land supply.

In addition to the above, the AMR does not include a commentary on how deliverability has been assessed against the requirements of paragraph 54 of PPS3.

Furthermore, the guidance from CLG confirms that the windfall sites cannot be relied upon in demonstrating a five year supply unless a Local Planning Authority can demonstrate genuine local circumstances exist to allow this exception. However, the second paragraph of the section entitled 'Housing Trajectory and Five Year Housing Supply' confirms that the estimated completions in the years 2008 to 2013 includes estimated yields through 'intensification' coming forward in future years. With reference to the definition of 'intensification' on page 13 of the AMR, it appears that the 'Housing Trajectory and Five Year Housing Supply' also includes provision for windfall sites. As such, the Council is required to demonstrate the 'genuine local circumstances exist to allow this exception'.

The pressures on delivery and need for additional sites are more acute when it is considered that an average delivery rate of 204 dwellings per annum was achieved during a strong period of housing market growth. In view of the current economic downturn, and significant problems faced within the housing market, the Council should seek to identify appropriate and deliverable sites to meet its regional housing target provision commitments. Suitable sites would include Coombes Farm, which has been positively promoted for development through the LDF process.

It may, therefore, be more appropriate for the Council not merely to allocate sufficient sites to meet the minimum targets set down by the East of England Plan, but to identify a reservoir of land capable of coming forward for development should the sites identified through the CSS and Allocations Development Plan Documents (DPD) fail to come forward for development within the anticipated timescales.

vi. Appendix H1

As set out in the representations to the Preferred Options Core Strategy, there is continuing concern that the list of improvements to infrastructure required in support of residential development as set out in Appendix H1 fails to provide the necessary justification for its inclusion. Whilst the preamble seeks to clarify why the infrastructure is sought, the inclusion of this list should be fully justified, otherwise it is of little value. Furthermore, it would be of benefit to provide further details of the existing community infrastructure provision and capacity within the evidence base.

The failure to provide the necessary justification for its inclusion means that the CSS will not be 'founded on a robust and credible evidence base' [test of soundness in the table following Paragraph 4.52 of PPS12].

d) Character of Place

As set out in the representations to the Preferred Options Core Strategy, Colonnade considers that, with respect to the requirement to produce and adhere to Development Briefs for large residential developments, as set out in Policy CP1, the Council should not seek to impose further demands on developers where existing regulations provide sufficient requirements regarding design. In this instance, Design and Access Statements provide sufficient design guidelines for developments and there is no additional information provided in the policy or supporting text that clearly sets out the justification for this requirement.

e) Green Belt

With reference to the comments regarding the redevelopment of employment sites under the 'Housing' section above and the requirement to allocate sufficient land to meet the minimum housing provision targets as required by the East of England Plan, Colonnade considers that the chapter on Green Belt, and policy GB1 in particular, fails to provide the necessary evidence base that will allow it to be monitored effectively.

It is inherent that the proposed redevelopment of previously developed employment sites for residential use in order to reduce the requirement to allocate previously undeveloped land for residential use will displace these employment uses. In turn, therefore, the separate allocation of previously undeveloped Green Belt to accommodate the compensatory employment provision is required. This is accepted in principle at paragraph 11.11 of the CSS.

Without providing clarification of the anticipated quantum of land required to accommodate the provision of housing and compensatory and new employment land, it is not possible to monitor the performance of policy GB1.

However, using the Council's figures in the table setting out the breakdown of the housing provision figures in Chapter 4 of the CSS (assuming that actual completions and extant permissions are all on previously developed land), setting aside the displacement of employment uses referred to above, approximately 42% of the required minimum housing provision target is capable of being accommodated on previously developed land (2,005 units from a total of 4,750). As such, the Council is required to provide at least 58% of the required minimum housing provision target on the Green Belt (2,745 units from a total of 4,750).

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If these figures are adjusted to take account of the displacement of employment uses (assuming the provision of an equal quantity of land is required to compensate for the employment land that is redeveloped), this figure changes to 17.5% on previously developed land and 82.5% on Green Belt (828 and 3,922 units from a total of 4,750 respectively). Even allowing for the achievement of higher densities of employment on new developments, the figures above are unlikely to change significantly.

Furthermore, the table in Chapter 4 also confirms that no previously developed land will be available for development beyond 2021, or 2015 if account is taken of the displacement of the employment uses.

In light of this, not only does Chapter 6 fail to provide the necessary evidence base that will allow it to be monitored effectively, it is also necessary to consider whether it presents the most appropriate strategy for addressing the required release of Green Belt land to accommodate the defined housing and employment delivery targets to 2025 and beyond as necessary. Colonnade considers a more robust approach that is flexible and capable of being monitored, would be to clearly identify those sites capable of delivery in the short term, which for the avoidance of doubt includes those sites being promoted by Colonnade, with a reservoir of alternative sites set aside for future growth.

As set out in the representations to the Preferred Options Core Strategy, Colonnade considers that the inclusion of an affordable housing exception policy within the CSS will aid the delivery of community housing within rural areas. However, the CSS does not contain such a policy, or adequately address the issue of community housing within rural areas and the CSS is not considered to provide sufficient flexibility to allow for the delivery of essential rural housing.

f) Environmental Issues

Colonnade has concerns regarding the justification for and effectiveness of a number of the policies contained within the Environmental Issues chapter, as follows:

â€¢ Policy ENV1: The Council fails to identify how it will "maintain, restore and enhance" the sites of nature conservation importance that are identified, or how the performance of this policy will be monitored;

â€¢ Policy ENV3: In the context of the advice at paragraph 4.32 of PPS12 regarding the reformulation of national policies, Colonnade does not consider that this policy is required; and

â€¢ Policy ENV9: As set out in the representations to the Preferred Options Core Strategy, Colonnade does not consider that the necessary evidence base has been provided to justify a policy that seeks to go above and beyond the policy targets for the Code for Sustainable Homes as set out by Central Government.

g) Community Infrastructure, Leisure and Tourism

Policy CLT1 refers to the requirement for residential and employment development to contribute to the infrastructure identified in Appendix CLT1 through Standard Charges.

However, whilst the general principle of securing planning obligations through the application of standard charges is broadly accepted, the list of infrastructure requirements set out in Appendix CLT1 is not supported by sufficient evidence base to identify its robustness and credibility. As such, Colonnade does not consider either policy CLT1 or Appendix CLT1 is justified in the context of PPS12.

It is also noted that, despite the clarification sought by Colonnade at the Core Strategy Preferred Options stage, the CSS fails to confirm what information should be contained within Health Impact Assessments, which are required by policy CLT4. Once again, Colonnade requests further clarification of what is involved in the assessment and the expected outputs, which will provide greater clarity and will allow the policy to be monitored.

h) Transport

Policy T8 confirms that the Council will apply minimum parking standards. As set out in the representations to the Preferred Options Core Strategy, the guidance in Planning Policy Guidance Note 13: Transport (PPG13) is clear regarding the imposition of parking standards.

Paragraphs 52-56 of PPG13 confirm that the Local Planning Authorities should apply maximum not minimum parking standards. In order to satisfy the legal requirements set out in PPS12, the policy must reflect PPG13 to promote sustainable transport choices and further provide incentives for developers to locate further residential land closer to local service centres by requiring maximum parking standards for residential developments.

i) Economic Development

As set out in the representations to the Preferred Options Core Strategy, the land at Three Ashes Farm provides an excellent opportunity to deliver employment growth in the short term and may be a suitable site for the 'Eco-Innovation Centre' that is being promoted by the Council. Its identification as a suitable location for strategic employment growth, or the provision of an Eco-Innovation Centre, would accord with the general principles of the policies contained within Chapter 11.

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16254 Object

CHAPTER 8 Policy ENV1 - Protection and Enhancement of the Natural Landscape and Habitats and the Protection of Historical and Archaeological Sites

The identification of Purdeys Industrial Estate as fit for purpose (in paragraph 11.32 and the Council's 2008 Employment Land Study 2008) and therefore it should be maintained and if possible expanded, is welcomed and Colonnade considers that Three Ashes Farm could deliver this expansion, providing a natural extension to Purdeys Industrial Estate and being strategically located close to the Airport.

Three Ashes would address the negative impacts that the nearby residential area experiences from the existing Industrial Estate by providing a buffer between established uses and the residential area with less intensive employment activities. The highways analysis that has been carried out has suggested that it would not have an adverse impact on roads and congestion. Furthermore, there are very few opportunities for businesses to expand and Three Ashes could provide this opportunity.

j) Conclusions

Following the submission of representations to the Preferred Options Core Strategy, Colonnade is disappointed to note that the CSS fails to take account of the majority of the issues raised in their representations.

In addition, Colonnade considers the plan to be 'unsound' as the document consistently fails to meet the tests of soundness set out in the table following Paragraph 4.52 of PPS12 and respectfully requests that the Council notifies Icen, on behalf of Colonnade, of the future arrangements for the Examination of the Core Strategy. Furthermore, Colonnade wishes to take this opportunity to formally register a request to appear at all stages of the Examination in Public, including the pre-hearing meeting and any planned hearing sessions whereby issues raised in the context of this letter are to be discussed. Please confirm this request, and that the representations made to the Preferred Options Core Strategy will be taken into account alongside the current representations, by way of return to this letter.

Icen Projects, on behalf of Colonnade Land LLP trusts that the Council will find these representations to be constructive and helpful in taking forward the Core Strategy. Should you wish to discuss any aspect of these representations further, please do not hesitate to contact us.

Summary: Policy ENV1: The Council fails to identify how it will "maintain, restore and enhance" the sites of nature conservation importance that are identified, or how the performance of this policy will be monitored;

Change to Plan

Appear at exam?	Yes	Soundness Tests	i
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Core Strategy Submission Document

S - 16380 - 8267 - Policy ENV1 - Protection and Enhancement of the Natural Landscape and Habitats and the Protection of Historical and Archaeological Sites - None

16380 Support

CHAPTER 8 Policy ENV1 - Protection and Enhancement of the Natural Landscape and Habitats and the Protection of Historical and Archaeological Sites

Respondent: Aber Ltd [8267]

Aber Ltd
C/o Agent

Agent: Colliers CRE (Mr S Chapman) [8266]

Colliers CRE
9 Marylebone Lane
London
W1U 1HL
020 7344 6533

Full Text: It is important that development is directed away from the sites of international, national and local nature conservations importance and support the implementation of the Crouch and Roach Management Plans.

Summary: It is important that development is directed away from the sites of international, national and local nature conservations importance and support the implementation of the Crouch and Roach Management Plans.

Change to Plan N/A

Appear at exam? No

Soundness Tests N/A

Core Strategy Submission Document

O - 16697 - 9072 - Policy ENV1 - Protection and Enhancement of the Natural Landscape and Habitats and the Protection of Historical and Archaeological Sites - i

16697 Object

CHAPTER 8 Policy ENV1 - Protection and Enhancement of the Natural Landscape and Habitats and the Protection of Historical and Archaeological Sites

Respondent: Essex County Council (Mr Roy Lewis) [9072] **Agent:** N/A

Essex County Council
ESH - Spatial Planning
Planning and Transport
County Hall
Chelmsford
CM1 4JU
01245-437578

Full Text: ROCHFORD CORE STRATEGY SUBMISSION DOCUMENT, SEPTEMBER 2009
RESPONSE OF ESSEX COUNTY COUNCIL

1. General Comment

Essex County Council welcomes and broadly supports the Core Strategy prepared by Rochford District Council. The Strategy contains policies and proposals that address the spatial characteristics, issues and opportunities facing the District whilst respecting the distinctive qualities of the different settlements and parts of the District.

The County Council fully supports the maintenance of a strong policy approach to protection of the Green Belt and of the quality of environmental assets in the District whilst making adequate housing and employment provision within the District. The Core Strategy presents an approach that emphasises a balance of opportunity through the District and recognition of emerging economic prospects in the District and neighbouring areas. The intended preparation of more detailed Action Area Plans for London Southend Airport and its environs and for each of the three town centres of Rayleigh, Rochford and Hockley will further enhance the approach of the Core Strategy. The emphasis on the three town centres is particularly welcomed as offering a stimulus to improvement in the services and facilities available locally within the District whilst also affording possibilities of increased community focus.

2. Housing Distribution and Locations

The East of England Plan requires Rochford to provide a minimum of 3,790 additional dwellings between 2006 and 2021. In addition, provision for a further 1,000 dwellings should be made between 2021 and 2025 to ensure delivery of housing for at least 15 years from adoption of the Core Strategy (expected in 2010). Of this total requirement the District Council has identified a capacity of 2,000 dwellings through a Strategic Housing Land Availability Assessment. This means that the Core Strategy has to identify locations for about 1,750 dwellings to be delivered before 2021 and a further 1,000 dwellings between 2021 and 2025.

Policy H1 (The efficient use of land for housing) is supported. However, prioritisation of the reuse of previously developed land within settlements for additional housing is unlikely to provide a sufficient source of provision due to the generally residential nature of existing settlements in the district and the absence of potentially large sites of previously developed land. The assessment of potential for additional housing provision within settlements already includes the proposed re-allocation to substantially residential use of 4 existing employment areas.

Within Policy H2 (Extensions to residential envelopes and phasing) and Policy H3 (Extension to residential envelopes post-2021) the District Council has adopted a balanced approach to the distribution of additional housing locations, which is based on identification of tiers of settlements defined by reference to their accessibility to jobs, services and facilities (some of which lie outside the District) and the need to protect the valued environments within the District. This approach is generally supported, although implementation and delivery of individual schemes should give further thought to securing sustainable functional relationships between proposed development locations and availability of jobs, services and facilities.

The proposed scale and phasing of development at each of the identified locations in Policy H2 and Policy H3 should be capable of being supported by County Council service groups, provided that adequate and timely funding is available. The County Council would wish to work with the District Council to ensure that future infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

3. Economic Development

The approach to Employment Growth (Policy ED1) is supported. Given the economic structure of Rochford District the support to be given to protection and enhancement of the role of small and medium sized businesses; enhancement of the District's commercial centres; and development of a skills training academy is particularly welcome. These measures will assist in building on the existing economic resource of the District.

Proposals for the comprehensive development of London Southend Airport and its environs (Policy ED2) are supported.

Core Strategy Submission Document

O - 16697 - 9072 - Policy ENV1 - Protection and Enhancement of the Natural Landscape and Habitats and the Protection of Historical and Archaeological Sites - i

16697 Object

CHAPTER 8 Policy ENV1 - Protection and Enhancement of the Natural Landscape and Habitats and the Protection of Historical and Archaeological Sites

The further elaboration of proposals through an Area Action Plan will provide a firm foundation to realise the economic regeneration and growth opportunities presented by effective use of the Airport. The recognition of the potential environmental impact of the Airport and the commitment to work to mitigate any adverse impacts on the environment and local amenities is fully supported.

The location of the proposed Eco-Enterprise Centre to the North of London Southend Airport (Policy ED4) is supported. Creation of the Centre would assist reduction of the rate of business start-up failure in the district. Further the proposed location for the Centre would afford a clear offer to businesses within an area of varied business activity.

The continued protection and enhancement of existing employment land (Policy ED3) is supported, as is the identification of 4 existing employment sites for appropriate alternative, substantially residential, uses. Each of the 4 sites affords particular issues and opportunities whereby their redevelopment for other uses and relocation of existing occupiers would confer advantage for the immediately neighbouring areas and for the District as a whole.

4. Town Centres

The town centres of Rayleigh, Rochford and Hockley, and future plans for them, are closely linked to the economic development of the District but also present the opportunity to offer greater community focus within the District. The varied approach being taken to each of these town centres is supported (Policy RTC4, RTC5 and RTC6), notably the recognition of the role and purpose of the town centres beyond retail uses.

The contribution that the County Library service could make to plans for the town centres should not be overlooked. The 5 libraries in the District are substantial footfall draws in their localities and act as a 'community anchor store'. This has knock-on effects in encouraging use of neighbouring retail and service facilities. Further the Library service is currently looking at co-location opportunities for other services within the libraries which would enable them to act as a community focus.

5. Transport

The transport aspects of the Core Strategy are well balanced in identifying potential measures that would meet the needs of existing residents and businesses in the District as well as needs arising from future development. The approach reflects and makes good reference to the transportation aspirations of the County Council. The policy emphasis on close working between the District Council and the County Council to advance the transport aspirations is welcomed and fully supported.

In relation to parking standards (Policy T8 and Paragraph 10.30) the review undertaken by Essex County Council in conjunction with the Essex Planning Officers Association has now been completed. Revised parking standards have been agreed and signed off as County Supplementary Guidance, in accordance with PPS12, and is being applied by the County Council as Local Highways Authority.

6. Coastal Protection Belt

Policy ENV2 (Coastal Protection Belt) is not supported because in its current form it is not a suitable or effective replacement policy for Policy CC1 of the Replacement Structure Plan. Structure Plan Policy CC1 (The Undeveloped Coast - Coastal Protection Belt) currently remains a 'saved' policy of the Essex and Southend-on-Sea Replacement Structure Plan, April 2001 (following a direction of the Secretary of State, dated 27th September 2007, under paragraph 1(3) of Schedule 8 to the Planning and Compulsory Purchase Act 2004). The existing Policy CC1 reads, 'Within the Coastal Protection Belt defined in adopted local plans there shall be the most stringent restrictions on development within the rural and undeveloped coastline situated outside existing built-up areas, and any development which is exceptionally permitted within this Belt shall not adversely affect the open and rural character, historic features or wildlife.'

Core Strategy Policy ENV2 should be revised to include specific reference to,

- * Definition of the boundary of the Coastal Protection Belt in another Development Plan Document;
- * the application of the most stringent restrictions on development within the rural and undeveloped coastline;
- * any development exceptionally permitted not adversely affecting the open and rural character, historic features or wildlife.

7. Historic Environment

The importance of the historic environment in Rochford District is clearly identified within the Core Strategy document. Nevertheless, the policy guidance could be usefully enhanced to promote consideration and enhancement of the historic environment and use of the historic environment to shape place. This would be achieved by the following amendments to the Core Strategy,

- * Policy ENV1 (Protection and Enhancement of the Natural Landscape and Habitats and the Protection of Historical and Archaeological Sites) should be amended by deletion of the final sentence and its replacement with, The Council is committed to the protection, promotion and enhancement of the diverse historic landscape and extensive surviving archaeological deposits of the District.

Core Strategy Submission Document

O - 16697 - 9072 - Policy ENV1 - Protection and Enhancement of the Natural Landscape and Habitats and the Protection of Historical and Archaeological Sites - i

16697 Object

CHAPTER 8 Policy ENV1 - Protection and Enhancement of the Natural Landscape and Habitats and the Protection of Historical and Archaeological Sites

* Paragraph 8.15 of the supporting text should be amended to better support the suggested amendment to Policy ENV1. The existing text of Paragraph 8.15 should be deleted in its entirety and replaced by,
The historic environment of Rochford District has developed through a history of human activity that spans over 450,000 years. Much of the resource lies hidden beneath the ground in the form of archaeological deposits. Other elements such as the historic landscape, the pattern of field, farms, woods and grazing marsh which characterise the District, are a highly visible record of millennia of agriculture, industry and commerce. Of particular significance are the coastal, island and estuarine areas where multi-period landscapes reflecting the exploitation of coastal and marshland resource survive. The District also includes the important historic medieval market towns of Rochford and Rayleigh.

* Page 16 (Sustainable Community Strategy Priority: Promoting a Greener District) should be amended to further support the approach to the Historic Environment. The fourth bullet of the Key Section/Policies of the Core Strategy should be amended to include the word 'historic', so that the first sentence of the bullet would read,
The Environment chapter seeks to protect and enhance the biodiversity, historic and natural environment of the District by protecting sites of local, national and international importance.

8. Community Infrastructure

The approach to Community Infrastructure is supported. The County Council would wish to work with the District Council to ensure that future community infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

In addition, it should be noted that,

* Some County Council services are not highly visible despite being regarded as highly desirable community services by local residents. The need to ensure adequate funding and contributions to enable these services to meet community expectations should be recognised and acknowledged in consideration of planning obligations and standard charges.

* The Adult Community Learning Centre at Rocheway, Rochford could be better located with regard to the wider Rochford/Castle Point area of service. Relocation of the Centre could provide opportunities both at the new location and for the current site.

* The Core Strategy should make specific reference to,

o Appendix H1, Location at South Canewdon: new Early Years and Childcare facilities;

o Policy CLT2, final sentence: insert after the words 'primary schools' the words 'and Early Years and Childcare facilities';

o Appendix CLT1, Other issues/comment: for Early years and childcare facilities add 'Land to be allocated within new residential areas, as appropriate'.

9. Implementation, Delivery and Monitoring

The inclusion in the Core Strategy of a section considering Implementation, Delivery and Monitoring is welcomed and supported. Nevertheless, the District Council, in moving towards implementation and delivery of the individual elements of the Core Strategy, should highlight those schemes and projects that are critical to achievement of other aspects of the Strategy.

Further, the monitoring proposal for Policy H6 (Lifetime Homes) and for Policy CP1 (Design) should be amended,

* Policy H6 (Lifetime Homes) - the identified monitoring tool is Core Indicator H6 Housing Quality Building for Life Assessments. The Building for Life Assessment methodology was devised to measure the overall design/layout quality of housing developments. It was not devised to measure compliance with Lifetime Homes, which is largely, but not exclusively, concerned with internal space standards and the provision of internal arrangements within dwellings to meet needs of all residents.

* Policy CP1 (Design) - the monitoring indicator proposed by the Core Strategy is not supported because it is unclear what the indicator would actually be measuring. The proposed indicator should be replaced by the Core Indicator, Housing Quality - Building for Life Assessments, as suggested by the County Council in its response to the Core Strategy Preferred Options, October 2008. A better approach would be to base evaluation and monitoring of Policy CP1 on the Commission for Architecture and the Built Environment's (CABE) 20 Building for Life principles, particularly as Government has endorsed these principles and is urging local authorities to use them to assess design quality. It is suggested that the monitoring arrangements for Preferred Option CP1 be deleted and replaced by the following text, 'The success of the implementation of this policy will be monitored by assessing schemes, or an appropriate sample of schemes, against the Commission for Architecture and the Built Environment's (CABE) Building for Life principles.'

10. Access to Housing

The Core Strategy notes the higher prevalence of older people in Rochford District and the need to support them. However, a more broadly based approach to access to housing should be adopted by Policies H4, H5 and H6. It should recognise the presence of other vulnerable adults in the community, for example, those with learning or mental health disability, and the range of possible forms of accommodation, including supported, sheltered and extra care accommodation. The high level of owner occupation in the District further emphasises the need for a broader approach. The emphasis on Lifetime Homes would not address the variety of future needs, whilst the potential exemptions to the

Core Strategy Submission Document

O - 16697 - 9072 - Policy ENV1 - Protection and Enhancement of the Natural Landscape and Habitats and the Protection of Historical and Archaeological Sites - i

16697 Object

CHAPTER 8 Policy ENV1 - Protection and Enhancement of the Natural Landscape and Habitats and the Protection of Historical and Archaeological Sites

Summary: Lifetime Homes policy standard in Policy H6 are likely to act against demographic trends. The importance of the historic environment in Rochford District is clearly identified within the Core Strategy document. Nevertheless, the policy guidance could be usefully enhanced to promote consideration and enhancement of the historic environment and use of the historic environment to shape place. This would be achieved by the following amendments to the Core Strategy,

Change to Plan Policy ENV1 (Protection and Enhancement of the Natural Landscape and Habitats and the Protection of Historical and Archaeological Sites) should be amended by deletion of the final sentence and its replacement with, The Council is committed to the protection, promotion and enhancement of the diverse historic landscape and extensive surviving archaeological deposits of the District.

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

S - 16843 - 7704 - Policy ENV1 - Protection and Enhancement of the Natural Landscape and Habitats and the Protection of Historical and Archaeological Sites - None

16843 Support

CHAPTER 8 Policy ENV1 - Protection and Enhancement of the Natural Landscape and Habitats and the Protection of Historical and Archaeological Sites

Respondent: English Heritage (Ms K Fletcher) [7704]

Agent: N/A

English Heritage
Brooklands
24 Brooklands Avenue
Cambridge
CB2 2BU

Full Text: ROCHFORD LOCAL DEVELOPMENT FRAMEWORK
CORE STRATEGY SUBMISSION DOCUMENT

Thank you for your letter dated 21 September 2009 consulting English Heritage on the above document. Our comments are set out below.

CHAPTER 4 HOUSING

Vision and objectives

While we note that character of place is addressed in chapter 5, it is important that this consideration is recognised as relevant within the Housing chapter. Paras 2.33, 2.69 and 2.73 also recognise the importance of character and sense of place in the built environment. We recommend that this consideration should be integrated into the vision and objectives for housing in order to improve the clarity of the plan, and its consistency with advice in PPS1.

Recommendation:

The following amendments are suggested:

- Vision in five years: add 'settlement character' after 'infrastructure'
- Vision by 2025: add 'and places' after 'communities' in bullet 1
- Objectives: In objective 2 amend to '...sustainable locations, enhancing sense of place and having regard to..'
- Para 4.19: Amend bullet 5 to read 'The historical, agricultural and ecological value of land, and settlement character'

CHAPTER 5 CHARACTER OF PLACE

We strongly support this section and policies CP1, CP2 and CP3. In the absence of policy coverage for listed buildings and scheduled monuments we recommend that para 5.9 should refer to PPGs 15 and 16, as well as draft PPS15.

CHAPTER 8 ENVIRONMENTAL ISSUES

We welcome the references the historic environment in the objectives and in policies ENV1 and ENV2.

Policy ENV6 Large Scale Renewable Energy Projects

We consider that this policy should refer to the historic interest of sites to reflect the advice in PPS22 more appropriately.

Recommendation: amend the first bullet in policy ENV6 to read '...it's ecological, historic or landscape value...'

CHAPTER 11 ECONOMIC DEVELOPMENT

Policy ED2 London Southend Airport

We understand that the grade I listed church in the vicinity of the runway will be protected in any proposals for expansion of the airport and the Core Strategy policy does not suggest otherwise. We will respond to the detail of proposals for the airport through responses to consultations on the Joint Area Action Plan and any planning applications.

In the interests of clarity, the above comments where we suggest changes to the Core Strategy should be recorded as objections to the soundness of the plan in terms of consistency with national guidance. However, we hope that it will be possible to agree amendments on these points prior to the public examination.

We would be happy to discuss any of these comments if you would find this useful.

Summary: CHAPTER 8 ENVIRONMENTAL ISSUES

We welcome the references the historic environment in the objectives and in policies ENV1 and ENV2.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 15982 - 13441 - Policy ENV2 - Coastal Protection Belt - None

15982 Support

CHAPTER 8 Policy ENV2 - Coastal Protection Belt

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: It is unclear how and to what extent the Council will "prevent the potential for coastal flooding; erosion by the sea; and unstable land (e.g. land slips)"

Summary: It is unclear how and to what extent the Council will "prevent the potential for coastal flooding; erosion by the sea; and unstable land (e.g. land slips)"

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16696 - 9072 - Policy ENV2 - Coastal Protection Belt - i, iii

16696 Object

CHAPTER 8 Policy ENV2 - Coastal Protection Belt

Respondent: Essex County Council (Mr Roy Lewis) [9072] **Agent:** N/A

Essex County Council
ESH - Spatial Planning
Planning and Transport
County Hall
Chelmsford
CM1 4JU
01245-437578

Full Text: ROCHFORD CORE STRATEGY SUBMISSION DOCUMENT, SEPTEMBER 2009
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Core Strategy Submission Document

16696 Object

CHAPTER 8 Policy ENV2 - Coastal Protection Belt

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Core Strategy Policy ENV2 should be revised to include specific reference to,

- * Definition of the boundary of the Coastal Protection Belt in another Development Plan Document;
- * the application of the most stringent restrictions on development within the rural and undeveloped coastline;
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16696 Object

CHAPTER 8 Policy ENV2 - Coastal Protection Belt

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The historic environment of Rochford District has developed through a history of human activity that spans over 450,000 years. Much of the resource lies hidden beneath the ground in the form of archaeological deposits. Other elements such as the historic landscape, the pattern of field, farms, woods and grazing marsh which characterise the District, are a highly visible record of millennia of agriculture, industry and commerce. Of particular significance are the coastal, island and estuarine areas where multi-period landscapes reflecting the exploitation of coastal and marshland resource survive. The District also includes the important historic medieval market towns of Rochford and Rayleigh.

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o Policy CLT2, final sentence: insert after the words 'primary schools' the words 'and Early Years and Childcare facilities';

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Further, the monitoring proposal for Policy H6 (Lifetime Homes) and for Policy CP1 (Design) should be amended,

* Policy H6 (Lifetime Homes) - the identified monitoring tool is Core Indicator H6 Housing Quality Building for Life Assessments. The Building for Life Assessment methodology was devised to measure the overall design/layout quality of housing developments. It was not devised to measure compliance with Lifetime Homes, which is largely, but not exclusively, concerned with internal space standards and the provision of internal arrangements within dwellings to meet needs of all residents.

* Policy CP1 (Design) - the monitoring indicator proposed by the Core Strategy is not supported because it is unclear what the indicator would actually be measuring. The proposed indicator should be replaced by the Core Indicator, Housing Quality - Building for Life Assessments, as suggested by the County Council in its response to the Core Strategy Preferred Options, October 2008. A better approach would be to base evaluation and monitoring of Policy CP1 on the Commission for Architecture and the Built Environment's (CABE) 20 Building for Life principles, particularly as Government has endorsed these principles and is urging local authorities to use them to assess design quality. It is suggested that the monitoring arrangements for Preferred Option CP1 be deleted and replaced by the following text, 'The success of the implementation of this policy will be monitored by assessing schemes, or an appropriate sample of schemes, against the Commission for Architecture and the Built Environment's (CABE) Building for Life principles.'

10. Access to Housing

The Core Strategy notes the higher prevalence of older people in Rochford District and the need to support them. However, a more broadly based approach to access to housing should be adopted by Policies H4, H5 and H6. It should recognise the presence of other vulnerable adults in the community, for example, those with learning or mental health disability, and the range of possible forms of accommodation, including supported, sheltered and extra care accommodation. The high level of owner occupation in the District further emphasises the need for a broader approach. The emphasis on Lifetime Homes would not address the variety of future needs, whilst the potential exemptions to the

Core Strategy Submission Document

O - 16696 - 9072 - Policy ENV2 - Coastal Protection Belt - i, iii

16696 Object

CHAPTER 8 Policy ENV2 - Coastal Protection Belt

Summary: Lifetime Homes policy standard in Policy H6 are likely to act against demographic trends.
Coastal Protection Belt

Policy ENV2 (Coastal Protection Belt) is not supported because in its current form it is not a suitable or effective replacement policy for Policy CC1 of the Replacement Structure Plan. Structure Plan Policy CC1 (The Undeveloped Coast - Coastal Protection Belt) currently remains a 'saved' policy of the Essex and Southend-on-Sea Replacement Structure Plan, April 2001 (following a direction of the Secretary of State, dated 27th September 2007, under paragraph 1(3) of Schedule 8 to the Planning and Compulsory Purchase Act 2004). The existing Policy CC1 reads, 'Within the Coastal Protection Belt defined in adopted local plans there shall be the most stringent restrictions on development within the rural and undeveloped coastline situated outside existing built-up areas, and any development which is exceptionally permitted within this Belt shall not adversely affect the open and rural character, historic features or wildlife.'

Change to Plan Core Strategy Policy ENV2 should be revised to include specific reference to,
* Definition of the boundary of the Coastal Protection Belt in another Development Plan Document;
* the application of the most stringent restrictions on development within the rural and undeveloped coastline;
* any development exceptionally permitted not adversely affecting the open and rural character, historic features or wildlife.

Appear at exam? Not Specified **Soundness Tests** i, iii

Core Strategy Submission Document

S - 16844 - 7704 - Policy ENV2 - Coastal Protection Belt - None

16844 Support

CHAPTER 8 Policy ENV2 - Coastal Protection Belt

Respondent: English Heritage (Ms K Fletcher) [7704]

Agent: N/A

English Heritage
Brooklands
24 Brooklands Avenue
Cambridge
CB2 2BU

Full Text: ROCHFORD LOCAL DEVELOPMENT FRAMEWORK
CORE STRATEGY SUBMISSION DOCUMENT

Thank you for your letter dated 21 September 2009 consulting English Heritage on the above document. Our comments are set out below.

CHAPTER 4 HOUSING

Vision and objectives

While we note that character of place is addressed in chapter 5, it is important that this consideration is recognised as relevant within the Housing chapter. Paras 2.33, 2.69 and 2.73 also recognise the importance of character and sense of place in the built environment. We recommend that this consideration should be integrated into the vision and objectives for housing in order to improve the clarity of the plan, and its consistency with advice in PPS1.

Recommendation:

The following amendments are suggested:

- Vision in five years: add 'settlement character' after 'infrastructure'
- Vision by 2025: add 'and places' after 'communities' in bullet 1
- Objectives: In objective 2 amend to '...sustainable locations, enhancing sense of place and having regard to..'
- Para 4.19: Amend bullet 5 to read 'The historical, agricultural and ecological value of land, and settlement character'

CHAPTER 5 CHARACTER OF PLACE

We strongly support this section and policies CP1, CP2 and CP3. In the absence of policy coverage for listed buildings and scheduled monuments we recommend that para 5.9 should refer to PPGs 15 and 16, as well as draft PPS15.

CHAPTER 8 ENVIRONMENTAL ISSUES

We welcome the references the historic environment in the objectives and in policies ENV1 and ENV2.

Policy ENV6 Large Scale Renewable Energy Projects

We consider that this policy should refer to the historic interest of sites to reflect the advice in PPS22 more appropriately.

Recommendation: amend the first bullet in policy ENV6 to read '...it's ecological, historic or landscape value...'

CHAPTER 11 ECONOMIC DEVELOPMENT

Policy ED2 London Southend Airport

We understand that the grade I listed church in the vicinity of the runway will be protected in any proposals for expansion of the airport and the Core Strategy policy does not suggest otherwise. We will respond to the detail of proposals for the airport through responses to consultations on the Joint Area Action Plan and any planning applications.

In the interests of clarity, the above comments where we suggest changes to the Core Strategy should be recorded as objections to the soundness of the plan in terms of consistency with national guidance. However, we hope that it will be possible to agree amendments on these points prior to the public examination.

We would be happy to discuss any of these comments if you would find this useful.

Summary: CHAPTER 8 ENVIRONMENTAL ISSUES

We welcome the references the historic environment in the objectives and in policies ENV1 and ENV2.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16852 - 9889 - Policy ENV2 - Coastal Protection Belt - None

16852 Support

CHAPTER 8 Policy ENV2 - Coastal Protection Belt

Respondent: Environment Agency (Miss Carrie Williams) [9889] **Agent:** N/A

Environment Agency
Iceni House
Cobham Road
Ipswich
Suffolk
IP3 9JD
United Kingdom
01473 706007

Full Text: Support

Summary: Support

Change to Plan N/A

Appear at exam? No **Soundness Tests** N/A

Core Strategy Submission Document

O - 16118 - 14160 - Flood Risk, 8.22 - i

16118 Object

CHAPTER 8 Flood Risk, 8.22

Respondent: Cllr Chris Black [14160]

56 Love Lane
Rayleigh
Essex
SS67DX

Agent: N/A

Full Text: This section does not sufficiently recognise the increased risk of flooding that would be created by new housing "north of London Road".

Summary: This section does not sufficiently recognise the increased risk of flooding that would be created by new housing "north of London Road".

Change to Plan Other, smaller, brownfield sites could be used as an alternative to 'land North of London Road'

Appear at exam? Yes

Soundness Tests i

Core Strategy Submission Document

O - 16381 - 8267 - Flood Risk, 8.22 - iii

16381 Object

CHAPTER 8 Flood Risk, 8.22

Respondent: Aber Ltd [8267]

Aber Ltd
C/o Agent

Agent: Colliers CRE (Mr S Chapman) [8266]

Colliers CRE
9 Marylebone Lane
London
W1U 1HL
020 7344 6533

Full Text:

Support the application of the sequential test, which seeks to direct development to areas at least risk of flooding. The application of PPS25 exceptions test will only be applied when the sequential test has shown that there are no available locations for necessary development other than within areas of at risk of flooding.

However, do not support the statement that the majority of development necessary within the District can be accommodated within Flood Zone 1 (areas least at risk of flooding), although there may be exceptions involving previously developed land.

PPS25 does not caveat that the exceptions test can be overridden by previously developed land; flood risk needs to be considered along with other planning issues. Taking into consideration the aim to manage risk, the use of a previous developed site in an area subject to flood risk would put property and people at greater risk; particularly, when it would replace a less vulnerable use (employment), with a more vulnerable use (residential).

Amend text of third sentence of fourth paragraph of 'Appraising Risk':

'... As such, it is envisaged that the majority of new development necessary within the District can be accommodated within Flood Zone 1 (areas of least risk of flooding).'

Summary:

Support the application of the sequential test, which seeks to direct development to areas at least risk of flooding. The application of PPS25 exceptions test will only be applied when the sequential test has shown that there are no available locations for necessary development other than within areas of at risk of flooding.

However, do not support the statement that the majority of development necessary within the District can be accommodated within Flood Zone 1 (areas least at risk of flooding), although there may be exceptions involving previously developed land.

PPS25 does not caveat that the exceptions test can be overridden by previously developed land; flood risk needs to be considered along with other planning issues. Taking into consideration the aim to manage risk, the use of a previous developed site in an area subject to flood risk would put property and people at greater risk; particularly, when it would replace a less vulnerable use (employment), with a more vulnerable use (residential).

Change to Plan

Amend text of third sentence of fourth paragraph of 'Appraising Risk':

'... As such, it is envisaged that the majority of new development necessary within the District can be accommodated within Flood Zone 1 (areas of least risk of flooding).'

Appear at exam? No

Soundness Tests iii

Core Strategy Submission Document

O - 16853 - 9889 - Flood Risk, 8.22 - i, iii

16853 Object

CHAPTER 8 Flood Risk, 8.22

Respondent: Environment Agency (Miss Carrie Williams) [9889] **Agent:** N/A

Environment Agency
Iceni House
Cobham Road
Ipswich
Suffolk
IP3 9JD
United Kingdom
01473 706007

Full Text: This paragraph makes mention of the Thames Gateway South Essex Strategic Flood Risk Assessment (SFRA) under the subheading "(1) Appraising risk". Please note that this SFRA was completed in 2006 prior to the publication of Planning Policy Statement 25. This SFRA therefore does not include up-to-date climate change scenarios that were introduced in PPS25. The newer climate change allowances can significantly increase the risk of flooding in areas and can present very different results from those published in the TGSE SFRA (2006). In addition, this SFRA did not cover the entire Rochford District.

In light of the above, this document cannot be relied upon for applying the Sequential test in accordance with PPS25 because the information contained within it is incomplete. The Environment Agency have made clear that an updated SFRA is required if development is being proposed within areas at risk of flooding. We have been involved in working with the council and some of the other South Essex Local Authorities in producing an updated SFRA however this has only reached scoping stage and we have had no guarantees that the project will be completed.

The Core Strategy cannot therefore be considered to be justified because it is not supported by a complete, accurate and up-to-date evidence base in the absence of a PPS25 compliant SFRA. In not being compliant with PPS25, this Core Strategy cannot be considered to be consistent with national flood risk policy as set out in PPS25.

In addition to the above, we do not believe that the Core Strategy is supported by sufficient evidence to justify the statement that there may be some exceptions to the provision of new development in Flood Zone 1 where previously developed land is available in higher risk flood zones. The general approach of giving priority to brownfield land is in line with PPS3, however the policy also recognises the need to take into account environmental constraints and risks, including flood risk, in setting out strategies for the planned location of new housing in order to achieve sustainable development objectives set out in Planning Policy Statement 1 and that some sites might not therefore be suitable for housing (see paragraphs 38 and 41). This ties in with the process of applying the PPS25 Sequential Test and Exception Test which places flood risk classification and the vulnerability of proposed developments as the primary concern, with the designation of land as brownfield as a secondary consideration when applying part b of the Exception Test. Given that the national target of 60% redevelopment of previously developed land (as required by PPS3) is deemed unrealistic in Rochford District (paragraph 4.15 of this Core Strategy) and that Policy H2 indicates that there will therefore be a need to release greenbelt land in order to accommodate required growth in nonconformity with Planning Policy Guidance note 2, there is no justification to support the assumption that developing the brownfield land in the high risk flood zone is the most appropriate course of action given the reasonable alternative of accommodating those housing figures in areas at lesser flood risk - either by releasing a minimal additional amount of greenbelt, or by slightly increasing density of development elsewhere.

The Core Strategy should acknowledge the inadequacy of the current Strategic Flood Risk Assessment and state their intention to update this vital study in order to comply with national policy and ensure that this DPD can be adequately justified.

The Council should also seek to provide clear and transparent justification of the LPAs decisions by carrying out a Sequential Test to support this Core Strategy document. At this stage in the development of the LDF, in the absence of an up-to-date SFRA, this would have to be based upon the Environment Agency's flood maps (future iterations for more detailed DPDS would require an up-to-date SFRA). Applying the PPS25 Sequential test will allow for all of the available alternatives to be properly assessed, including justification for the Council's decision to prioritise brownfield development in areas of flood risk when some greenbelt land in areas of lesser flood risk is already being released, or development densities could be increased in other areas.

Please note that should the Inspector deem it necessary for us to attend the Examination in Public, we would be happy to do so but our preferred method at this time would be written representations.

Summary: This paragraph makes mention of the Thames Gateway South Essex Strategic Flood Risk Assessment (SFRA) under the subheading "(1) Appraising risk". Please note that this SFRA was completed in 2006 prior to the publication of Planning Policy Statement 25. This SFRA therefore does not include up-to-date climate change scenarios that were introduced in PPS25. The newer climate change allowances can significantly increase the risk of flooding in areas and can present very different results from those published in the TGSE SFRA (2006). In addition, this SFRA did not cover the entire Rochford District.

In light of the above, this document cannot be relied upon for applying the Sequential test in accordance with PPS25

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

Core Strategy Submission Document

O - 16853 - 9889 - Flood Risk, 8.22 - i, iii

16853 Object

CHAPTER 8 Flood Risk, 8.22

because the information contained within it is incomplete. The Environment Agency have made clear that an updated SFRA is required if development is being proposed within areas at risk of flooding. We have been involved in working with the council and some of the other South Essex Local Authorities in producing an updated SFRA however this has only reached scoping stage and we have had no guarantees that the project will be completed.

The Core Strategy cannot therefore be considered to be justified because it is not supported by a complete, accurate and up-to-date evidence base in the absence of a PPS25 compliant SFRA. In not being compliant with PPS25, this Core Strategy cannot be considered to be consistent with national flood risk policy as set out in PPS25.

In addition to the above, we do not believe that the Core Strategy is supported by sufficient evidence to justify the statement that there may be some exceptions to the provision of new development in Flood Zone 1 where previously developed land is available in higher risk flood zones. The general approach of giving priority to brownfield land is in line with PPS3, however the policy also recognises the need to take into account environmental constraints and risks, including flood risk, in setting out strategies for the planned location of new housing in order to achieve sustainable development objectives set out in Planning Policy Statement 1 and that some sites might not therefore be suitable for housing (see paragraphs 38 and 41). This ties in with the process of applying the PPS25 Sequential Test and Exception Test which places flood risk classification and the vulnerability of proposed developments as the primary concern, with the designation of land as brownfield as a secondary consideration when applying part b of the Exception Test. Given that the national target of 60% redevelopment of previously developed land (as required by PPS3) is deemed unrealistic in Rochford District (paragraph 4.15 of this Core Strategy) and that Policy H2 indicates that there will therefore be a need to release greenbelt land in order to accommodate required growth in nonconformity with Planning Policy Guidance note 2, there is no justification to support the assumption that developing the brownfield land in the high risk flood zone is the most appropriate course of action given the reasonable alternative of accommodating those housing figures in areas at lesser flood risk - either by releasing a minimal additional amount of greenbelt, or by slightly increasing density of development elsewhere.

Please note that should the Inspector deem it necessary for us to attend the Examination in Public, we would be happy to do so but our preferred method at this time would be written representations.

Change to Plan

The Core Strategy should acknowledge the inadequacy of the current Strategic Flood Risk Assessment and state their intention to update this vital study in order to comply with national policy and ensure that this DPD can be adequately justified.

The Council should also seek to provide clear and transparent justification of the LPAs decisions by carrying out a Sequential Test to support this Core Strategy document. At this stage in the development of the LDF, in the absence of an up-to-date SFRA, this would have to be based upon the Environment Agency's flood maps (future iterations for more detailed DPDS would require an up-to-date SFRA). Applying the PPS25 Sequential test will allow for all of the available alternatives to be properly assessed, including justification for the Council's decision to prioritise brownfield development in areas of flood risk when some greenbelt land in areas of lesser flood risk is already being released, or development densities could be increased in other areas.

Appear at exam? No

Soundness Tests i, iii

Core Strategy Submission Document

S - 16048 - 14107 - Policy ENV3 - Flood Risk - None

16048 Support

CHAPTER 8 Policy ENV3 - Flood Risk

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: We have concerns that insufficient attention has been paid to the issue of flooding. More detail is required on flood mitigation measures.

Summary: We have concerns that insufficient attention has been paid to the issue of flooding. More detail is required on flood mitigation measures.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16076 - 9599 - Policy ENV3 - Flood Risk - None

16076 Support

CHAPTER 8 Policy ENV3 - Flood Risk

Respondent: Mrs Fiona Jury [9599]

WGDP Ltd
Cross Keys House
22 Queen Street
Salisbury
SP1 3EY

Agent: N/A

Full Text: We support the approach to the evaluation of previously-developed land in Flood Risk Zone 3, which should strictly follow the approach outlined in PPS25. However, if sites are unable to pass the exceptions test, then it will require a review of the Green Belt to accommodate new housing growth.

Summary: We support the approach to the evaluation of previously-developed land in Flood Risk Zone 3, which should strictly follow the approach outlined in PPS25. However, if sites are unable to pass the exceptions test, then it will require a review of the Green Belt to accommodate new housing growth.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16154 - 9823 - Policy ENV3 - Flood Risk - i

16154 Object

CHAPTER 8 Policy ENV3 - Flood Risk

Respondent: mr alistir matthews [9823]

Agent: N/A

telfords farm
chelmsford road
battlesbridge
wickford
SS118TR
uk
01268732069

Full Text: some areas of the land north of london road is within zone 3 all the area drains to the rawreth brook which affects existing residents increasing their risk of flooding .This appears unsound as it puts others in risk of flood and in danger that their houses become uninsurable .

Summary: some areas of the land north of london road is within zone 3 all the area drains to the rawreth brook which affects existing residents increasing their risk of flooding .This appears unsound as it puts others in risk of flood and in danger that their houses become uninsurable .

Change to Plan Rawreth parish councils proposals site drains away from the rawreth brook exiting into the river crouch a mile downstream of the lock gates in battlesbridge which can under some circumstances affect the drainage in rawreth brook.

Appear at exam? No

Soundness Tests i

Core Strategy Submission Document

O - 16255 - 9177 - Policy ENV3 - Flood Risk - i

16255 Object

CHAPTER 8 Policy ENV3 - Flood Risk

Respondent: Colonnade Land LLP [9177]

Colonnade Land LLP
Fifth Floor
17-19 Maddox Street
London
W15 2QH
020 7255 7490

Agent: Icen Projects Limited (David Churchill) [10057]

Icen Projects Limited
83 Victoria Street
London
SJ1H 0HW

Full Text: ROCHFORD DISTRICT COUNCIL - LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY SUBMISSION
SEPTEMBER 2009

Icen Projects Ltd (Icen) has been instructed by Colonnade Land LLP (Colonnade) to submit representations to the Rochford Local Development Framework Core Strategy Submission (CSS).

a) Overview

It is our conclusion that the CSS is not justified, effective or consistent with national policy, as required by Planning Policy Statement 12: Creating Strong Safe and Prosperous Communities through Local Spatial Planning (PPS12) and is therefore vulnerable to being found unsound by an Inspector through the Examination in Public.

b) Background and Summary

These representations follow those made by Icen on behalf of Colonnade to the Preferred Options Core Strategy, submitted via letter dated 17 December 2008. In this regard, we would request that the Council confirms that the representations made to the Preferred Options Core Strategy will be taken into account alongside the current representations, particularly as there are a number of cross references between the two sets of representations.

It is not considered necessary to reiterate the content of the previous representations, as they were made at the appropriate stage and will be considered by the Planning Inspectorate in due course, but it is inevitable that certain elements will require restating where it is not clear that they have been taken into account in the production of the CSS. For clarity, therefore, Colonnade feel that it is appropriate to clarify the 'in-principle' issues that were raised in the representations to the Preferred Options Core Strategy, recognising that these issues were raised in the context of a wider and more coherent justification made within the representations:

- â€¢ Further cross-referencing of the recommendations made within the evidence base is required;
- â€¢ Greater focus should be placed on promoting Rochford as the principal settlement within the District;
- â€¢ Coombes Farm is the most logical location for residential development abutting the urban area of Rochford and as such warrants recognition as a general location for residential development;
- â€¢ The allocation of Three Ashes Farm for employment generating uses will be pursued;
- â€¢ Recognition that it is not realistic to expect residential allocations to be met mainly on Brownfield sites, nor should the intensification of smaller sites in residential areas be pursued;
- â€¢ Many of the sites identified as suitable for residential development will not be viable and will not come forward for development within the timescales anticipated;
- â€¢ The failure to provide the necessary justification for the proposed infrastructure improvements sought in Appendix H1;
- â€¢ The inclusion of an affordable housing exception policy was sought; and
- â€¢ The need to identify sites capable of delivering employment growth in the short term.

Following assessment of the CSS presented by the Council for consultation prior to submission to the Secretary of State, Colonnade considers the Plan to be 'unsound' as the document consistently fails to meet the tests of soundness set out in the table following Paragraph 4.52 of PPS12. For clarity, PPS12 confirms that to be 'sound' a Core Strategy should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY and defines 'justified' as "founded on a robust and credible evidence base" and "the most appropriate strategy when considered against the reasonable alternatives" and 'effective' as "deliverable", "flexible" and "able to be monitored".

The rationale for the above is identified in the remainder of these representations, which are provided in the interests of ensuring the Council delivers a strong, robust and logical Core Strategy that guides the future development of the District in a justified and effective manner.

b) Colonnade

As the Council is aware from previous submissions to the Local Development Framework, Colonnade is a strategic land company with a particular interest in the future development of the District as a consequence of a number of sites that it controls, particularly around Rochford.

The Council will also be aware that Colonnade has recently submitted an outline planning application for the residential development of the land at Coombes Farm, Rochford to provide a sustainable urban extension comprising up to 326

16255 Object

CHAPTER 8 Policy ENV3 - Flood Risk

residential dwellings, with associated accesses and community uses. Whilst the planning application process is clearly separate from the Local Development Framework production process, Colonnade wishes to continue the promotion of the site as a suitable location for residential development.

Accordingly, these representations focus on the legal requirements and tests of soundness associated principally with the Housing and Employment chapters of the CSS, with reference where appropriate to the sites that are controlled by Colonnade, the outline planning application at Coombes Farm and other issues where relevant.

c) Housing

i. Date of Adoption

The CSS assumes an adoption date of 2010 and plans for the provision of housing to 2025.

Taking account of the potential delays to the adoption of the Plan, including the Examination process, it would be more appropriate for the CSS to provide sufficient flexibility to allow for delays in its adoption. Colonnade considers an adoption date of 2011 for the CSS is a more realistic target.

Taking account of the advice in Paragraph 4.13 of PPS12, which states that the time horizon for the Core Strategy should be "at least 15 years from the date of adoption" it would be appropriate for the CSS to plan for the provision of housing to 2026 at the earliest. As such, Colonnade does not consider the CSS to be 'flexible' in the context of the tests of soundness in the table following Paragraph 4.52 of PPS12.

ii. Housing Delivery

However, setting the above aside, the Housing Chapter identifies the minimum housing delivery target for the period 2001 to 2021 of 4,600 dwellings as set out in the East of England Plan, with the annual average requirement of 250 dwellings per annum to extend provision from 2021 to 2025. It also confirms that the residual target for the period 2006 to 2021 is 3,790 dwellings, taking account of the delivery of 810 dwellings in the period 2001 to 2006, and a further 618 dwellings have been completed between 2006 and 2008.

This leaves a residual housing provision target of a minimum of 3,172 dwellings in the period 2008 to 2021. Taking into account the required provision beyond 2021, the residual housing provision target in the period 2008 to 2025 is a minimum of 4,172 dwellings. The disparity between these figures and those provided within the CSS are explained by the rounding down of the annual average delivery requirement in the period 2006 to 2021 to 250 dwellings per annum, compared with the actual figure of 252.67.

The table at Paragraph 4.6 of the CSS identifies the source of housing provision that will meet the identified minimum requirements and includes figures for 'Extant Planning Permissions' and 'Existing allocations/other appropriate sites identified in Strategic Housing Land Availability Assessment'. These figures, along with the actual completions within the period are combined to produce the figure for the 'Total without Green Belt release' figure.

Setting aside the concern regarding under-provision associated with the rounding down of the annual average delivery requirement in the period 2006 to 2021, the CSS fails to identify the sites that will contribute to the 'Extant Planning Permissions' provision. The identification of the sites that will contribute to the 'Extant Planning Permissions' should be provided in the context of the findings of the Inspector in the appeal by Asprey Homes [APP/G5180/A/07/2043219/NWF] who determined that the reliance on a delivery rate of 100% is unsafe [IR287].

Furthermore, at the time of writing these representations, the Strategic Housing Land Availability Assessment 2009 has not been published. It is impossible therefore for a full assessment of the proposed housing provision to be undertaken to confirm whether the CSS is 'founded on a robust and credible evidence base' [test of soundness in the table following Paragraph 4.52 of PPS12].

iii. Redevelopment of Employment Sites

Paragraph 4.14 of the CSS refers to the identification of the four employment sites that are considered by the Council to be suitable for redevelopment to residential use. However, the failure to publish the Strategic Housing Land Availability Assessment 2009 either before or alongside the publication of the CSS means that the assumptions made by the Council as to the suitability, availability, viability and deliverability of the sites cannot be assessed.

It has been necessary, therefore, to review the assumptions made in the Rochford Urban Capacity Study 2007 (UCS) regarding the sites. Within the section of the UCS entitled 'Redevelopment of Established Employment Land' [pages 22 & 23] includes a list of those sites assessed, their indicative capacities and the probability of residential development coming forward at the sites within the plan period (identified elsewhere as 2001 - 2021). The list includes the four sites identified in the CSS of Eldon Way/Foundry Estate, Hockley; Rawreth Lane Industrial Estate, Rayleigh; Stambridge Mills; and Star Lane Industrial Estate, Great Wakering.

In total, the UCS identifies an indicative residential redevelopment capacity of 486 units on the four sites (118, 220, 60 and 88 respectively). Of these, it identifies the Rawreth Lane Industrial Estate and Stambridge Mills as having a 'high'

16255 Object

CHAPTER 8 Policy ENV3 - Flood Risk

probability of coming forward for development in the Plan period (2001 - 2021), which would deliver 280 residential dwellings using the Council's own figures. The Star Lane Industrial Estate (referred to in the UCS as the Star Lane Brickworks) is identified as having a 'medium' probability of coming forward for development in the Plan period, with capacity to deliver 88 residential dwellings. It is unclear, therefore, where the figure for 'Existing allocations/other appropriate sites identified in Strategic Housing Land Availability Assessment'.

Set against this is the identification of these four sites in the CSS as being capable of delivery for residential development within the Plan period, with 671 units delivered between 2006 and 2015 and a further 506 units between 2015 and 2021.

The UCS also states in the same section that:

"There are considerable areas of land in the district that are currently allocated for, and in use as, employment land. The redevelopment of such sites for residential use would reduce demand for residential development on greenfield sites, but would at the same time create a need for alternative sites to be found for employment. Such an approach, which would be likely to require the decontamination of existing employment land to make it fit for residential use, together with development of a greenfield site and implementation of additional infrastructure to serve the new employment area, may well be unsustainable." [our emphasis]

The UCS appears to confirm therefore, that not only would the redevelopment of the four sites listed in the CSS be unlikely within the Plan period, but also potentially unsustainable. In this regard, it is notable that the promoters of Stambridge Mills sought the Screening Opinion of the Council as to whether Environmental Impact Assessment of the planning application for the redevelopment of the site for residential use was required in 2007, but to date are yet to submit a planning application for the redevelopment of the site.

In light of this, Colonnade does not consider the CSS is 'the most appropriate strategy when considered against the reasonable alternatives' [test of soundness in the table following Paragraph 4.52 of PPS12], which include the provision of residential development in East Rochford.

iv. Strategic Housing Growth to the East of Rochford

Furthermore, whilst paragraph 2.62 of the CSS identifies concern relating to the identification of locations to the east of Rochford for development on the basis that 'vehicular movements would inevitably be directed through Rochford's historic core', the CSS later identifies Stambridge Mills as a suitable site for residential redevelopment.

In light of the evident conflicts between the evidence base provided in support of the CSS and the absence of other evidence, the CSS is not considered 'sound' in the context of the tests of soundness in the table following Paragraph 4.52 of PPS12.

v. Housing Trajectory

Paragraph 4.28 of the CSS confirms that policies H1, H2 and H3 of the CSS will deliver housing supply as illustrated in the Housing Trajectory at Appendix H2. This Housing Trajectory is transposed from the 2008 Annual Monitoring Report (AMR).

Whilst on the face of it, the Housing Trajectory appears to confirm that the Council can meet its requirement to identify a five year housing supply, many of the sites identified within the AMR do not conform to the guidance issued by CLG in August 2008, on the assessment of a five year land supply. The guidance identifies sites that can be included within the five year assessment of housing supply as:

"those that are allocated for housing in the Development Plan, sites that have planning permission (outline or full planning permission that has not been implemented) and specific, unallocated brownfield sites that have the potential to make a significant contribution to housing delivery during the 5 year period".

Table 4.10: Projected Net Completions of the AMR confirms that the five year housing land supply figure includes sites from 'other land allocated for residential purposes', which are based on land allocations outside existing settlements. However, it should be clarified that these land allocations are not currently allocated for housing development in an adopted Development Plan. As such, these unallocated greenfield sites that are yet to make significant progress through the planning system should be discounted and the five year housing land supply recalculated.

The table below has been prepared to confirm the extent of the shortfall should the sites from 'other land allocated for residential purposes' be removed from the calculation of the Rochford five year housing land supply, in accordance with the guidance issued by CLG:

Recalculated Five Year Housing Land Supply (2009 - 2014):

Year
1st April 2009 to 31st March 2010
Predicted Delivery (A)

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106 dwellings
Allocations on 'other land allocated for residential purposes' (B)
0
Residual delivery (A-B)
106 dwellings
Delivery Shortfall
0

Year
1st April 2010 to 31st March 2011
Predicted Delivery (A)
217 dwellings
Allocations on 'other land allocated for residential purposes' (B)
150
Residual delivery (A-B)
67 dwellings
Delivery Shortfall
150

Year
1st April 2011 to 31st March 2012
Predicted Delivery (A)
544 dwellings
Allocations on 'other land allocated for residential purposes' (B)
300
Residual delivery (A-B)
244 dwellings
Delivery Shortfall
300

Year
1st April 2012 to 31st March 2013
Predicted Delivery (A)
395 dwellings
Allocations on 'other land allocated for residential purposes' (B)
375
Residual delivery (A-B)
20 dwellings
Delivery Shortfall
375

Year
1st April 2013 to 31st March 2014
Predicted Delivery (A)
300 dwellings
Allocations on 'other land allocated for residential purposes' (B)
300
Residual delivery (A-B)
0 dwellings
Delivery Shortfall
300

TOTAL

Predicted Delivery (A)
1,562 dwellings

Allocations on 'other land allocated for residential purposes' (B)
1,125 dwellings

Residual delivery (A-B)
437 dwellings

Delivery Shortfall
1,125 dwellings

The above table confirms that the removal of the 'other land allocated for residential purposes' from the calculation of the Rochford five year housing land supply leaves the Council with a minimum net additional housing delivery of 437 dwellings, which equates to a supply of 1.7 years based on the adjusted annual delivery target of a minimum of 255 net

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additional dwellings per annum. As such, the Council is failing to meet its requirement to demonstrate a five year housing land supply in accordance with PPS3 and the supporting guidance provided by CLG. It is notable that the recent application by David Wilson Homes at Land between Main Road and Rectory Road and Clements Hall Way, Hawkwell identifies an even greater shortfall in the Council's five year housing land supply.

In addition to the above, the AMR does not include a commentary on how deliverability has been assessed against the requirements of paragraph 54 of PPS3.

Furthermore, the guidance from CLG confirms that the windfall sites cannot be relied upon in demonstrating a five year supply unless a Local Planning Authority can demonstrate genuine local circumstances exist to allow this exception. However, the second paragraph of the section entitled 'Housing Trajectory and Five Year Housing Supply' confirms that the estimated completions in the years 2008 to 2013 includes estimated yields through 'intensification' coming forward in future years. With reference to the definition of 'intensification' on page 13 of the AMR, it appears that the 'Housing Trajectory and Five Year Housing Supply' also includes provision for windfall sites. As such, the Council is required to demonstrate the 'genuine local circumstances exist to allow this exception'.

The pressures on delivery and need for additional sites are more acute when it is considered that an average delivery rate of 204 dwellings per annum was achieved during a strong period of housing market growth. In view of the current economic downturn, and significant problems faced within the housing market, the Council should seek to identify appropriate and deliverable sites to meet its regional housing target provision commitments. Suitable sites would include Coombes Farm, which has been positively promoted for development through the LDF process.

It may, therefore, be more appropriate for the Council not merely to allocate sufficient sites to meet the minimum targets set down by the East of England Plan, but to identify a reservoir of land capable of coming forward for development should the sites identified through the CSS and Allocations Development Plan Documents (DPD) fail to come forward for development within the anticipated timescales.

vi. Appendix H1

As set out in the representations to the Preferred Options Core Strategy, there is continuing concern that the list of improvements to infrastructure required in support of residential development as set out in Appendix H1 fails to provide the necessary justification for its inclusion. Whilst the preamble seeks to clarify why the infrastructure is sought, the inclusion of this list should be fully justified, otherwise it is of little value. Furthermore, it would be of benefit to provide further details of the existing community infrastructure provision and capacity within the evidence base.

The failure to provide the necessary justification for its inclusion means that the CSS will not be 'founded on a robust and credible evidence base' [test of soundness in the table following Paragraph 4.52 of PPS12].

d) Character of Place

As set out in the representations to the Preferred Options Core Strategy, Colonnade considers that, with respect to the requirement to produce and adhere to Development Briefs for large residential developments, as set out in Policy CP1, the Council should not seek to impose further demands on developers where existing regulations provide sufficient requirements regarding design. In this instance, Design and Access Statements provide sufficient design guidelines for developments and there is no additional information provided in the policy or supporting text that clearly sets out the justification for this requirement.

e) Green Belt

With reference to the comments regarding the redevelopment of employment sites under the 'Housing' section above and the requirement to allocate sufficient land to meet the minimum housing provision targets as required by the East of England Plan, Colonnade considers that the chapter on Green Belt, and policy GB1 in particular, fails to provide the necessary evidence base that will allow it to be monitored effectively.

It is inherent that the proposed redevelopment of previously developed employment sites for residential use in order to reduce the requirement to allocate previously undeveloped land for residential use will displace these employment uses. In turn, therefore, the separate allocation of previously undeveloped Green Belt to accommodate the compensatory employment provision is required. This is accepted in principle at paragraph 11.11 of the CSS.

Without providing clarification of the anticipated quantum of land required to accommodate the provision of housing and compensatory and new employment land, it is not possible to monitor the performance of policy GB1.

However, using the Council's figures in the table setting out the breakdown of the housing provision figures in Chapter 4 of the CSS (assuming that actual completions and extant permissions are all on previously developed land), setting aside the displacement of employment uses referred to above, approximately 42% of the required minimum housing provision target is capable of being accommodated on previously developed land (2,005 units from a total of 4,750). As such, the Council is required to provide at least 58% of the required minimum housing provision target on the Green Belt (2,745 units from a total of 4,750).

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CHAPTER 8 Policy ENV3 - Flood Risk

If these figures are adjusted to take account of the displacement of employment uses (assuming the provision of an equal quantity of land is required to compensate for the employment land that is redeveloped), this figure changes to 17.5% on previously developed land and 82.5% on Green Belt (828 and 3,922 units from a total of 4,750 respectively). Even allowing for the achievement of higher densities of employment on new developments, the figures above are unlikely to change significantly.

Furthermore, the table in Chapter 4 also confirms that no previously developed land will be available for development beyond 2021, or 2015 if account is taken of the displacement of the employment uses.

In light of this, not only does Chapter 6 fail to provide the necessary evidence base that will allow it to be monitored effectively, it is also necessary to consider whether it presents the most appropriate strategy for addressing the required release of Green Belt land to accommodate the defined housing and employment delivery targets to 2025 and beyond as necessary. Colonnade considers a more robust approach that is flexible and capable of being monitored, would be to clearly identify those sites capable of delivery in the short term, which for the avoidance of doubt includes those sites being promoted by Colonnade, with a reservoir of alternative sites set aside for future growth.

As set out in the representations to the Preferred Options Core Strategy, Colonnade considers that the inclusion of an affordable housing exception policy within the CSS will aid the delivery of community housing within rural areas. However, the CSS does not contain such a policy, or adequately address the issue of community housing within rural areas and the CSS is not considered to provide sufficient flexibility to allow for the delivery of essential rural housing.

f) Environmental Issues

Colonnade has concerns regarding the justification for and effectiveness of a number of the policies contained within the Environmental Issues chapter, as follows:

â€¢ Policy ENV1: The Council fails to identify how it will "maintain, restore and enhance" the sites of nature conservation importance that are identified, or how the performance of this policy will be monitored;

â€¢ Policy ENV3: In the context of the advice at paragraph 4.32 of PPS12 regarding the reformulation of national policies, Colonnade does not consider that this policy is required; and

â€¢ Policy ENV9: As set out in the representations to the Preferred Options Core Strategy, Colonnade does not consider that the necessary evidence base has been provided to justify a policy that seeks to go above and beyond the policy targets for the Code for Sustainable Homes as set out by Central Government.

g) Community Infrastructure, Leisure and Tourism

Policy CLT1 refers to the requirement for residential and employment development to contribute to the infrastructure identified in Appendix CLT1 through Standard Charges.

However, whilst the general principle of securing planning obligations through the application of standard charges is broadly accepted, the list of infrastructure requirements set out in Appendix CLT1 is not supported by sufficient evidence base to identify its robustness and credibility. As such, Colonnade does not consider either policy CLT1 or Appendix CLT1 is justified in the context of PPS12.

It is also noted that, despite the clarification sought by Colonnade at the Core Strategy Preferred Options stage, the CSS fails to confirm what information should be contained within Health Impact Assessments, which are required by policy CLT4. Once again, Colonnade requests further clarification of what is involved in the assessment and the expected outputs, which will provide greater clarity and will allow the policy to be monitored.

h) Transport

Policy T8 confirms that the Council will apply minimum parking standards. As set out in the representations to the Preferred Options Core Strategy, the guidance in Planning Policy Guidance Note 13: Transport (PPG13) is clear regarding the imposition of parking standards.

Paragraphs 52-56 of PPG13 confirm that the Local Planning Authorities should apply maximum not minimum parking standards. In order to satisfy the legal requirements set out in PPS12, the policy must reflect PPG13 to promote sustainable transport choices and further provide incentives for developers to locate further residential land closer to local service centres by requiring maximum parking standards for residential developments.

i) Economic Development

As set out in the representations to the Preferred Options Core Strategy, the land at Three Ashes Farm provides an excellent opportunity to deliver employment growth in the short term and may be a suitable site for the 'Eco-Innovation Centre' that is being promoted by the Council. Its identification as a suitable location for strategic employment growth, or the provision of an Eco-Innovation Centre, would accord with the general principles of the policies contained within Chapter 11.

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CHAPTER 8 Policy ENV3 - Flood Risk

The identification of Purdeys Industrial Estate as fit for purpose (in paragraph 11.32 and the Council's 2008 Employment Land Study 2008) and therefore it should be maintained and if possible expanded, is welcomed and Colonnade considers that Three Ashes Farm could deliver this expansion, providing a natural extension to Purdeys Industrial Estate and being strategically located close to the Airport.

Three Ashes would address the negative impacts that the nearby residential area experiences from the existing Industrial Estate by providing a buffer between established uses and the residential area with less intensive employment activities. The highways analysis that has been carried out has suggested that it would not have an adverse impact on roads and congestion. Furthermore, there are very few opportunities for businesses to expand and Three Ashes could provide this opportunity.

j) Conclusions

Following the submission of representations to the Preferred Options Core Strategy, Colonnade is disappointed to note that the CSS fails to take account of the majority of the issues raised in their representations.

In addition, Colonnade considers the plan to be 'unsound' as the document consistently fails to meet the tests of soundness set out in the table following Paragraph 4.52 of PPS12 and respectfully requests that the Council notifies Icen, on behalf of Colonnade, of the future arrangements for the Examination of the Core Strategy. Furthermore, Colonnade wishes to take this opportunity to formally register a request to appear at all stages of the Examination in Public, including the pre-hearing meeting and any planned hearing sessions whereby issues raised in the context of this letter are to be discussed. Please confirm this request, and that the representations made to the Preferred Options Core Strategy will be taken into account alongside the current representations, by way of return to this letter.

Icen Projects, on behalf of Colonnade Land LLP trusts that the Council will find these representations to be constructive and helpful in taking forward the Core Strategy. Should you wish to discuss any aspect of these representations further, please do not hesitate to contact us.

Summary: â€¢ Policy ENV3: In the context of the advice at paragraph 4.32 of PPS12 regarding the reformulation of national policies, Colonnade does not consider that this policy is required

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16382 - 8267 - Policy ENV3 - Flood Risk - iii

16382 Object

CHAPTER 8 Policy ENV3 - Flood Risk

Respondent: Aber Ltd [8267]

Aber Ltd
C/o Agent

Agent: Colliers CRE (Mr S Chapman) [8266]

Colliers CRE
9 Marylebone Lane
London
W1U 1HL
020 7344 6533

Full Text:

Support the principal of directing development to areas least at risk of flooding. The application of PPS25 exceptions test should only be applied when the sequential test has shown that there are no available locations for necessary development other than within areas at risk of flooding.

Do not support the statement that previously developed land within Flood Zone 3 should be considered ahead of greenfield land that has a lower flood risk. PPS25 does not caveat that the exceptions test can be overridden by previously developed land; flood risk needs to be considered along with other planning issues. Taking into consideration the aim to manage risk, the use of a previous developed site in an area subject to flood risk would put property and people at greater risk; particularly, when it would replace a less vulnerable use (employment), with a more vulnerable use (residential).

Amend text of first paragraph of policy to:

'We seek to direct development away from areas at risk of flooding by applying the sequential test and, where appropriate, the exceptions test, as per PPS25. It is envisaged that the majority of development can be accommodated in areas at least risk of flooding (Zone 1).'

Summary:

Support the principal of directing development to areas least at risk of flooding. The application of PPS25 exceptions test should only be applied when the sequential test has shown that there are no available locations for necessary development other than within areas at risk of flooding.

Do not support the statement that previously developed land within Flood Zone 3 should be considered ahead of greenfield land that has a lower flood risk. PPS25 does not caveat that the exceptions test can be overridden by previously developed land; flood risk needs to be considered along with other planning issues. Taking into consideration the aim to manage risk, the use of a previous developed site in an area subject to flood risk would put property and people at greater risk; particularly, when it would replace a less vulnerable use (employment), with a more vulnerable use (residential).

Change to Plan

Amend text of first paragraph of policy to:

'We seek to direct development away from areas at risk of flooding by applying the sequential test and, where appropriate, the exceptions test, as per PPS25. It is envisaged that the majority of development can be accommodated in areas at least risk of flooding (Zone 1).'

Appear at exam? No

Soundness Tests iii

Core Strategy Submission Document

O - 16854 - 9889 - Policy ENV3 - Flood Risk - i, iii

16854 Object

CHAPTER 8 Policy ENV3 - Flood Risk

Respondent: Environment Agency (Miss Carrie Williams) [9889] **Agent:** N/A

Environment Agency
Iceni House
Cobham Road
Ipswich
Suffolk
IP3 9JD
United Kingdom
01473 706007

Full Text:

The wording of this policy seems to suggest that any residential development proposed on brownfield land in areas of Flood Zone 3 will be permitted regardless of the outcomes of the Sequential Test. This Policy is therefore unsound because it is not consistent with national policy set out in PPS25.

We also consider this policy to be unjustified because it is not supported by sufficient evidence to justify the underlying assumption that protecting greenbelt land should take preference to avoiding high density development in areas within Flood Zone 3 which would pose risks to life and property. The general approach of giving priority to brownfield land is in line with national policy within PPS3, however PPS3 also recognises the need to take into account environmental constraints and risks, including flood risk, in setting out strategies for the planned location of new housing in order to achieve sustainable development objectives set out in Planning Policy Statement 1 and that some sites might not therefore be suitable for housing (see paragraphs 38 and 41). This ties in with the process of applying the PPS25 Sequential Test and Exception Test which places flood risk classification and the vulnerability of proposed developments as the primary concern, with the designation of land as brownfield as a secondary consideration when applying part b of the Exception Test. Given that the national target of 60% redevelopment of previously developed land (as required by PPS3) is deemed unrealistic in Rochford District (paragraph 4.15 of this Core Strategy) and that Policy H2 indicates that there will therefore be a need to release greenbelt land in order to accommodate required growth in nonconformity with Planning Policy Guidance note 2, there is no justification to support the assumption that developing the brownfield land in the high risk flood zone is the most appropriate course of action given the reasonable alternative of accommodating those housing figures in areas at lesser flood risk - either by releasing a minimal additional amount of greenbelt, or by slightly increasing density of development elsewhere.

We do support the inclusion of the Council's intention to capitalise on opportunities to make space for water wherever possible as this is in line with government objectives as set out in "Making Space for Water".

The Council will need to provide clear and transparent justification of their decisions by carrying out a Sequential Test to support this Core Strategy document. At this stage in the development of the LDF, in the absence of an up-to-date SFRA, this would have to be based upon the Environment Agency's flood maps (future iterations for more detailed DPDS would require an up-to-date SFRA). Applying the PPS25 Sequential test will allow for all of the available alternatives to be properly assessed, including justification for the Council's decision to prioritise brownfield development in areas of flood risk when some greenbelt land in areas of lesser flood risk is already being released, or development densities could be increased in other areas.

Should the above evidence be deemed to support the Council's preferences for previously-developed land over flood risk posed to life and property, the policy will however require rewording as follows:

"The Council will direct development away from areas at risk of flooding by applying the PPS25 Sequential Test. The vast majority of development will be accommodated within Flood Zone 1, however some previously-developed land within Flood Zone 3 will be considered for residential development where this will negate the need to release Green Belt land and evidence can be provided in support of the PPS25 Exception Test.

The Council will continue to work with the Environment Agency to manage flood risk in a sustainable manner through capitalising on opportunities to make space for water wherever possible and through the continued provision of flood defences where necessary."

An alternative approach would be to reword Policy ENV3 as follows:

"The Council will apply the sequential approach to new development in line with the requirements of PPS25. Where development can only be located within areas at risk of flooding, an overall reduction in flood risk will be sought with preference given to designs that manage flood risk in a sustainable manner.

The Council will continue to work with the Environment Agency to manage flood risk in a sustainable manner through capitalising on opportunities to make space for water wherever possible, and through the continued provision of flood defences where necessary."

Please note that should the Inspector deem it necessary for us to attend the Examination in Public, we would be happy to do so but our preferred method at this time would be written representations.

Core Strategy Submission Document

O - 16854 - 9889 - Policy ENV3 - Flood Risk - i, iii

16854 Object

CHAPTER 8 Policy ENV3 - Flood Risk

Summary:

The wording of this policy seems to suggest that any residential development proposed on brownfield land in areas of Flood Zone 3 will be permitted regardless of the outcomes of the Sequential Test. This Policy is therefore unsound because it is not consistent with national policy set out in PPS25. We also consider this policy to be unjustified because it is not supported by sufficient evidence to justify the underlying assumption that protecting greenbelt land should take preference to avoiding high density development in areas within Flood Zone 3 which would pose risks to life and property. The general approach of giving priority to brownfield land is in line with national policy within PPS3, however PPS3 also recognises the need to take into account environmental constraints and risks, including flood risk, in setting out strategies for the planned location of new housing in order to achieve sustainable development objectives set out in Planning Policy Statement 1 and that some sites might not therefore be suitable for housing (see paragraphs 38 and 41). This ties in with the process of applying the PPS25 Sequential Test and Exception Test which places flood risk classification and the vulnerability of proposed developments as the primary concern, with the designation of land as brownfield as a secondary consideration when applying part b of the Exception Test. Given that the national target of 60% redevelopment of previously developed land (as required by PPS3) is deemed unrealistic in Rochford District (paragraph 4.15 of this Core Strategy) and that Policy H2 indicates that there will therefore be a need to release greenbelt land in order to accommodate required growth in nonconformity with Planning Policy Guidance note 2, there is no justification to support the assumption that developing the brownfield land in the high risk flood zone is the most appropriate course of action given the reasonable alternative of accommodating those housing figures in areas at lesser flood risk - either by releasing a minimal additional amount of greenbelt, or by slightly increasing density of development elsewhere.

We do support the inclusion of the Council's intention to capitalise on opportunities to make space for water wherever possible as this is in line with government objectives as set out in "Making Space for Water".

Please note that should the Inspector deem it necessary for us to attend the Examination in Public, we would be happy to do so but our preferred method at this time would be written representations.

Change to Plan

The Council will need to provide clear and transparent justification of their decisions by carrying out a Sequential Test to support this Core Strategy document. At this stage in the development of the LDF, in the absence of an up-to-date SFRA, this would have to be based upon the Environment Agency's flood maps (future iterations for more detailed DPDS would require an up-to-date SFRA). Applying the PPS25 Sequential test will allow for all of the available alternatives to be properly assessed, including justification for the Council's decision to prioritise brownfield development in areas of flood risk when some greenbelt land in areas of lesser flood risk is already being released, or development densities could be increased in other areas.

Should the above evidence be deemed to support the Council's preferences for previously-developed land over flood risk posed to life and property, the policy will however require rewording as follows:

"The Council will direct development away from areas at risk of flooding by applying the PPS25 Sequential Test. The vast majority of development will be accommodated within Flood Zone 1, however some previously-developed land within Flood Zone 3 will be considered for residential development where this will negate the need to release Green Belt land and evidence can be provided in support of the PPS25 Exception Test.

The Council will continue to work with the Environment Agency to manage flood risk in a sustainable manner through capitalising on opportunities to make space for water wherever possible and through the continued provision of flood defences where necessary."

An alternative approach would be to reword Policy ENV3 as follows:

"The Council will apply the sequential approach to new development in line with the requirements of PPS25. Where development can only be located within areas at risk of flooding, an overall reduction in flood risk will be sought with preference given to designs that manage flood risk in a sustainable manner.

The Council will continue to work with the Environment Agency to manage flood risk in a sustainable manner through capitalising on opportunities to make space for water wherever possible, and through the continued provision of flood defences where necessary."

Appear at exam? No

Soundness Tests i, iii

Core Strategy Submission Document

S - 16881 - 8329 - Policy ENV3 - Flood Risk - None

16881 Support

CHAPTER 8 Policy ENV3 - Flood Risk

Respondent: Swan Hill Homes Limited [8329]

Swan Hill Homes Limited
C/O Agent
Mr P Kneen
Charles Planning

Agent: Charles Planning Associates Ltd (Mr P Kneen) [5040]

Charles Planning Associates Ltd
1644-1645 Parkway
Solent Business Park
Whiteley
Fareham
Hampshire
PO15 7AH
01489 580853

Full Text:

1.0 Instruction and Introduction

1.1 Charles Planning Associates Limited (Chartered Town Planners) is Instructed by Swan Hill Homes Limited (Swan Hill) to prepare and submit representations on their behalf in respect of the Rochford District Local Development Framework: Core Strategy Submission (September 2009) Development Plan Document.

1.2 The comments refer to the relevant sections and policy designations in the Submission document, as appropriate.

1.3 The comments set out in this submission are intended to assist the District Council in taking forward its Local Development Framework. It is our intention to continue to be involved in the LDF preparation process and we look forward to the opportunity to comment further at the Examination to the Core Strategy.

1.4 If you have any queries regarding the content of this submission then please do not hesitate to contact:

Peter Kneen BSc (Hons) MSc MRTPI
Planner

2.0 Housing:
Policy H1 - The Efficient Use of Land for Housing

2.1 Swan Hill recognises the importance of seeking to concentrate new developments mainly in the existing urban areas, on previously developed land where possible, particularly in view of the Government seeking to ensure 60% of all such new developments are on previously development land (PDL).

2.2 However, given the character of the District, and the strategic housing requirement of the East of England Plan, Swan Hill supports the approach that the Council must also make provision for additional development on the edge of existing settlements on greenfield sites, particularly in the most sustainable locations. As such, Swan Hill supports that where feasible, the redevelopment of existing employment sites for residential/employment purposes can make a contribution towards the strategic housing requirement, provided that sufficient additional employment land is brought forward to ensure the stability of employment levels in the District, and to ensure employment growth meets the East of England Plan requirements.

2.3 Swan Hill considers that Policy H1 should include consideration that new extensions to existing settlements have regard to their potential impact on the wider characteristics and openness objectives of the Green Belt.

Policy H2 - Extensions to Residential Envelopes and Phasing

2.4 Swan Hill generally supports the approach taken by the Council in this policy. As set out above, Swan Hill consider the Council's acknowledgment that housing requirements should be met through the allocation of land on the edge of the existing settlements is the most suitable way forward to meeting the Council's strategic housing requirement and complies with the advice in PPS3.

2.5 The need for suitable greenfield urban extensions represents the best way forward for the Council to meet its strategic housing requirement, as set out in the East of England Plan. Swan Hill supports the recognition that the potential supply of alternative previously developed sites is limited, without detrimentally affecting the character of the District, and therefore the best way forward is the use of sustainable greenfield urban extensions to the existing settlements of the District.

2.6 However, Swan Hill consider that a fundamental consideration that the District Council should consider relates to the potential impact of the urban extensions on the Green Belt policy has been somewhat overlooked. The wider sustainability credentials of the settlements of the District should only be one of many key considerations for determining the level of expansion. In view of the proximity of Southend-on-Sea to all the main settlements of the District, and the influence this has on the likely location many people would travel for employment and leisure, sustainability of many of the settlements is not a key overarching factor, and greater weight should be placed on the potential impact on the openness of the Green Belt, as this cannot be remedied if development occurs in the wrong location.

2.7 As such, Swan Hill considers that determining the location of growth for the main settlements should be to identify

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CHAPTER 8 Policy ENV3 - Flood Risk

those locations where the impact on the wider setting of the Green Belt can be minimised. Further justification for those general locations chosen should be identified in Policy H2. In this regard, Swan Hill has serious concerns regarding the removal of Land South West of Great Wakering as a viable option for the growth of the settlement. The development of this area of Great Wakering, in addition to the potential redevelopment of the Star Lane Industrial Estate could provide a more comprehensive development, whilst ensuring that the wider openness of the Green Belt is maintained. Land South West of Great Wakering is significantly better placed to limit the impact on the wider Green Belt than Land West of Great Wakering, and could contribute to the provision of an important amenity and wildlife site for the local community.

2.8 In addition, Swan Hill consider that the Council now has no reserve provision in the event that any of the existing employment sites set out in Policy H1 fail to come forward for development within the envisaged timescale. Further, Land West of Great Wakering has not been identified in the SHLAA as a deliverable site to help meet the strategic housing requirement, contrary to the requirement set out in PPS3.

2.9 As such, Swan Hill would support the provision of suitable sites which could be safeguarded for future development in the likelihood of a shortfall in supply.

Policy H3 - Extensions to Residential Envelopes Post 2021

2.10 As set out above, Swan Hill supports the overall approach the Council has taken towards the provision of sustainable urban extensions as a suitable means of meeting their strategic housing requirement. However, as set out for Policy H2 above, Swan Hill has serious concerns regarding the removal of several proposed sites set out in the October 2008 Preferred Options Core Strategy, without any guarantee of the ability to deliver those sites set out in Policy H1.

2.11 As also considered above, the inclusion of West of Great Wakering for 250 dwellings should not be included ahead of South West of Great Wakering, in view of the fact that the site is not identified in the SHLAA as available, suitable and achievable as required by PPS3, and thus is not supported by a robust and creditable evidence base for its inclusion as a strategic site for development.

2.12 Whilst Swan Hill acknowledge that alterations to Policy H1 has resulted in the removal of some locations for growth in Policy H3 (as set out in the Sustainability Appraisal), Swan Hill does not consider that the most appropriate locations have been chosen.

2.13 In addition to the matters raised above, the use of West of Great Wakering would also result in the loss of valuable agricultural land, which clearly in a Green Belt location, should be less suitable for development than other sites, such as South West of Great Wakering, which would have limited impact on the wider Green Belt policy, and not result in the loss of valuable agricultural land.

2.14 Finally, in respect of Policies H1, H2 and H3, all of the above comments are based on our interpretation of the Submission Version Core Strategy when compared to the October 2008 Version of the Core Strategy. Without the ability to undertake a detailed assessment of the Council's SHLAA, it is not possible to clarify the proposed Core Strategy position regarding the proposed direction of growth proposed for the settlements in the District. As such, Swan Hill reserves the right to make additional representations regarding the proposed Policies H1, H2 and H3 following the publication of the SHLAA in due course.

Policy H4 - Affordable Housing

2.15 In general terms, Swan Hill supports the approach taken by the Council towards the provision of affordable housing for new residential developments. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H5 - Dwelling Types

2.16 Swan Hill supports the policy provision of H5, and considers that the approach taken by the Council for this policy represents a suitably flexible alternative to stipulating percentages of dwelling mix, sought by some local authorities. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H6 - Lifetime Homes

2.17 In regard to this policy, Swan Hill objects to the Council's policy where all new dwellings should be provided to the Lifetime Homes Standard. Whilst it is acknowledged that the UK has an aging population, Swan Hill considers that seeking to provide Lifetime Homes on all sites is considered to be overly onerous for proposed developers, particularly when considering the requirement for all car parking spaces to be suitable for disabled users, which could result in more schemes becoming unviable. Therefore, the provision of a percentage of Lifetime Homes should be considered through negotiations with the Council at the planning application stage, and should be determined on a case-by-case basis.

3.0 Character of Place: Policy CP1 - Design

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CHAPTER 8 Policy ENV3 - Flood Risk

3.1 The Town and Country Planning (General Development Procedure) Order 1995 (As Amended) makes the submission of a Design and Access Statement for most types of planning applications a Statutory requirement, and as such, the provision of a Design Brief represents a pre-requisite of all major planning applications.

3.2 Policy CP1 seeks to ensure the provision of good, high quality developments that reflect local characteristics and distinctiveness, this ideology is supported by Swan Hill.

4.0 The Green Belt:
Policy GB1 - Green Belt Protection

4.1 Following the amendments to the wording of the Policy since the October 2008 Preferred Options Core Strategy, Swan Hill is now generally supportive of Policy GB1 and its supporting text. However, as expressed above, it is important that where alterations to the Green Belt boundary occur as a result of the extension of the settlements to meet the strategic housing requirement, both the minimal amount of land is taken and where that land is taken for development, it represents the best available land which has a minimal impact of the wider openness characteristic of the Green Belt.

5.0 Environmental Issues:
Policy ENV3 - Flood Risk

5.1 Swan Hill generally supports the approach set out in Policy ENV3 regarding ensuring development accords with the sequential test of PPS25. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV4 - Sustainable Drainage Systems (SUDS)

5.2 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV4. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV8 - On-site Renewable and Low Carbon Energy Generation

5.3 Whilst Swan Hill recognises the importance of reducing carbon emissions, particularly in new housing developments, and the role this can play in reducing the nations overall Greenhouse emissions. As such Swan Hill is generally supportive of Policy ENV8. It is noted that Policy ENG1 of the East of England Plan sets out a threshold of developments comprising 10 or more dwellings. Swan Hill consider it important for the District Council to justify the reduction in the threshold level.

5.4 Further, no assessment of Policy ENV8 has been set out in the Sustainability Appraisal which justifies the change in threshold from that of Policy ENG1 of the RSS.

Policy ENV9 - Code for Sustainable Homes

5.5 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV9. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

6.0 Community Infrastructure, Leisure and Tourism:
Policy CLT1 - Planning Obligations and Standard Charges

6.1 Swan Hill generally supports the overall approach the Council has taken in Policy CLT1. It is considered Policy CLT1 sets out a degree of flexibility to ensure that all sites are considered on a site-by-site basis, assessing the individual merits of each planning application, in order to ensure the levels of contributions applicable meet the five tests of Circular 05/05. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policies CLT5 - Open Space;
CLT7 - Play Space;
CLT8 - Youth Facilities; and,
CLT10 - Playing Pitches

6.2 Swan Hill supports the need for new residential developments to incorporate a degree of new publicly accessible open space, children's play space, youth facilities and playing pitches, and as such, generally supports the policy approaches taken by the Council.

6.3 However, it is important that whilst the Council may seek to undertake an assessment of providing standard charges for new development, which, as set out in Policy CLT1, this should be based on thorough public consultation and consideration and sound justification. Swan Hill consider that within the provision of a standard charge, it is important that such provision allows for a degree of flexibility to ensure that each site is assessed individually and on its own merits. This is particularly important for those sites close to existing open spaces and facilities. As such, the levels of

16881 Support

CHAPTER 8 Policy ENV3 - Flood Risk

open space and recreation facilities required in the 'standard charge' should be based on an up-to-date PPG17 Open Space assessment, which should be used to form a key consideration in the levels of provision likely to be required in the standard charge system proposed.

7.0 Transport: Policy T1 - Highways

7.1 Swan Hill supports the overall objectives set out in Policy T1 requiring developments to be located and designed to reduce the reliance on the private car and to meet the infrastructure needs generated by development or seek to help achieve these needs is acceptable in principle.

7.2 Swan Hill recognises the importance of providing sufficient infrastructure provision to meet the requirements of development, and that where developments have insufficient consideration of impact on existing infrastructure, they should be considered unacceptable and contrary to National policy guidance. However, Swan Hill considers it important to emphasise that the developer's role should not be seen as a means to meet existing shortfalls in provision.

Policy T3 - Public Transport

7.3 Swan Hill is generally supportive of the policy approach set out in T3, however, as set out in paragraph 7.2 above, it is important that the District Council do not consider that it is the developer's responsibility to resolve existing shortfalls in provision of public transport, and any contribution towards additional public transportation provision should only be to mitigate against the additional level of demand likely from the development proposed.

Policy T5 - Cycling and Walking

7.4 Swan Hill supports the general approach to this policy, as Swan Hill recognises the importance of promoting the use of alternatives to the private car. The policy provision acknowledges the need to ensure relevant contributions in the event of additional travel demands generated by individual developments, whilst also setting out additional aspirations for the cycle network in the District.

7.5 As such, Swan Hill considers this policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy T8 - Parking Standards

7.6 The Council has recently (January 2007) adopted SPD on the requirements for parking standards, and as such, Swan Hill generally supports the policy approach chosen by the Council. As set out in the SPD, whilst Swan Hill generally supports the approach taken by the District Council towards setting residential parking standards, in that the Council has recognised that in the suburban areas, even with some access to public transport, the majority of residents will rely on the use of private cars. However, Swan Hill has concerns over the failure of the District Council to comply with the provisions of PPG13: Transport (2001) which sets out that Local Planning Authorities should not set minimum standards for car parking. Whilst it is acknowledged that PPS3 sets out provision for the consideration of local circumstances, it is considered that the Council has not justified this deviation from PPG13's maximum standard.

7.7 Whilst it is acknowledged that such justification may become apparent through the work currently being undertaken by Essex County Council, until such time, the District Council should only seek to apply the maximum standards indicated in PPG13. However, Swan Hill recommends that the District Council make provisions in the wording of the Policy to allow for changes in the event that future policy on car parking standards need to reflect the County standard, following the completion of the County Council review.

8.0 Economic Development: Policies ED3 - Existing Employment Land ED4 - Future Employment Allocations

8.1 In respect of Policies ED3 and ED4, Swan Hill notes that they have changed considerably since the October 2008 Preferred Options document, in that they are site specific regarding the location of the proposed redevelopment of existing employment sites. These four sites are also identified in Policy H1 - Efficient Use of Land, and in general, Swan Hill supports the approach to the redevelopment of these sites (where feasible) based on the assessments of the sites set out in this version of the Core Strategy.

8.2 However, Swan Hill has concerns that these policies might not be considered suitably sound given that insufficient opportunity has been allocated for consultation on their redevelopment. Without the SHLAA being publically available prior to the consultation on this Core Strategy, an insufficient evidence base has been provided to corroborate that these sites are neither suitable or deliverable to meet the test of soundness requirements.

Summary:

Policy ENV3 - Flood Risk

5.1 Swan Hill generally supports the approach set out in Policy ENV3 regarding ensuring development accords with the sequential test of PPS25. The Policy accords with the advice of National Policy and is therefore considered sound by

Core Strategy Submission Document

S - 16881 - 8329 - Policy ENV3 - Flood Risk - None

16881 Support

CHAPTER 8 Policy ENV3 - Flood Risk

Swan Hill.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16091 - 7336 - Policy ENV4 - Sustainable Drainage System (SUDS) - i

16091 Object

CHAPTER 8 Policy ENV4 - Sustainable Drainage System (SUDS)

Respondent: Rayleigh Town Council (Mrs K Cumberland) [7336] **Agent:** N/A

Rayleigh Town Council
The Pavilion
King George V Playing Field
Bull Lane
Rayleigh
Essex
SS6 8JD

01268 741880

Full Text: Policy ENV4 For SUDS to be sustainable it is necessary for the Environment Agency and landowners to maintain ditches and watercourses in a satisfactory manner. This unfortunately is not the case at the moment. Without this there will undoubtedly be future flooding problems. This policy is considered to be unsound in its' present form and should be made far more robust in conjunction with ENV3

Summary: Policy ENV4 For SUDS to be sustainable it is necessary for the Environment Agency and landowners to maintain ditches and watercourses in a satisfactory manner. This unfortunately is not the case at the moment. Without this there will undoubtedly be future flooding problems. This policy is considered to be unsound in its' present form and should be made far more robust in conjunction with ENV3

Change to Plan see above comments

Appear at exam? No **Soundness Tests** i

Core Strategy Submission Document

O - 16112 - 7995 - Policy ENV4 - Sustainable Drainage System (SUDS) - i, iii

16112 Object

CHAPTER 8 Policy ENV4 - Sustainable Drainage System (SUDS)

Respondent: Mr Alan Stone [7995]

180 Rawreth Lane
Rayleigh
Essex
SS6 9RN
United Kingdom
01268 784031

Agent: N/A

Full Text:

View Comments (1) Policy ENV4 - Sustainable Drainage Systems (SUDS)
Quote from this section: "All residential development over 10 units will be required to incorporate runoff control via SUDS to ensure runoff and infiltration rates do not increase the likelihood of flooding".
I am not sure that this statement is accurate. Priory Chase estate (86 dwellings, school, sports centre and supermarket) and built over the last 3 years, adjoins Rawreth Lane has created a flood risk to houses in the Lane. Water is collected by a SUDS system but the Hydrabrace release system is of too high capacity. The site developers, with the approval of RDC officers, have carried out alterations to the main run-off ditch and twice this year it was within a couple of inches of overflowing. On the second occasion, RDC rapidly issued sand bags to adjacent dwellings and by doing this, by default, they were admitting it is a flood risk. The only reason the ditch did not flood over was that the rain ceased. Despite promises that the situation would be rectified, nothing has been done. Currently the local Member of Parliament is persecuting the situation.
RDC make these open ended statements in the document but in truth they do not reflect failure of actual systems they have approved in the recent past.
How do we ensure that future developments will meet the SUDS standards?

Summary:

Runoff control from the recent development at Priory Chase is very poor and the ditch the water flows through along Rawreth Lane has been close to flooding in the past year. On the second occasion, RDC rapidly issued sand bags to adjacent dwellings and by doing this, by default, they were admitting it is a flood risk.
RDC make these open ended statements in the document but in truth they do not reflect failure of actual systems they have approved in the recent past.
How do we ensure that future developments will meet the SUDS standards?

Change to Plan

Introduce strict monitoring to ensure SUDS systems are truly capable of dealing with runoff.

Appear at exam? No

Soundness Tests i, iii

Core Strategy Submission Document

O - 16119 - 7995 - Policy ENV4 - Sustainable Drainage System (SUDS) - i, ii, iii

16119 Object

CHAPTER 8 Policy ENV4 - Sustainable Drainage System (SUDS)

Respondent: Mr Alan Stone [7995]

180 Rawreth Lane
Rayleigh
Essex
SS6 9RN
United Kingdom
01268 784031

Agent: N/A

Full Text:

This submission should be read in connection with my comments in Representation ID 16112. The site, known in this document as 'North of London Road', slopes from its northern perimeter to the south. A basin is formed in the lower areas and is identified by the Environment Agency on their web-site as an area liable to flood. The basin opens out in a westerly direction and joins the Rawreth brook which takes runoff water to the river Crouch, which in turn, flows out to the sea. Rawreth brook, which is non tidal, passes through low lying ground in Church Road, west of Rawreth village. This is an area known to flood and water has entered adjacent dwellings on a number of occasions in the past. Most recently being within the last year. The erection of 1020 new dwellings on the site 'North of London Road' will create an enormous amount of additional water runoff, which will fall naturally towards the lower basin and then to Rawreth brook. Even with SUDS, I do not believe that the Rawreth brook will manage vast amounts of extra water. This will, without doubt, result in further and more frequent flooding of properties in Church Road.

Should the development of a major housing estate north of London Road be approved, there will be an inevitable risk of flooding on a far greater scale than exists now. Thorough flood risk assessments to eliminate the smallest possibility of flooding should be carried out and made public before any proposals to build are given approval

Summary:

1020 new dwellings on the site 'North of London Road' will create an enormous amount of additional water runoff, which will eventually fall naturally towards Rawreth Brook. Even with SUDS, Rawreth brook will not manage vast amounts of extra water resulting in more frequent flooding of properties in Church Road.

Change to Plan

In respect of the development North of London Road, a clause similar to the one below should be included. Thorough flood risk assessments to eliminate the smallest possibility of flooding should be carried out and made public before any proposals to build are given approval. If these requirements cannot be met, no housing development on this land will be given approval.

Appear at exam? No

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 16616 - 5219 - Policy ENV4 - Sustainable Drainage System (SUDS) - i, ii

16616 Object

CHAPTER 8 Policy ENV4 - Sustainable Drainage System (SUDS)

Respondent: Fairview New Homes Ltd [5219]

Fairview New Homes Ltd
50 Lancaster Road
Enfield
Middlesex
EN2 0BY
020 83661271

Agent: Planning Potential (Miss G Brickwood) [7549]

Planning Potential
Palace House
3 Cathedral Street
London
SE1 9DE
0207 357 8000

Full Text: Representations on behalf of Fairview New Homes

1. We are instructed by our client, Fairview New Homes, to submit comments on the published Core Strategy Submission Document. For ease specific reference has been made in accordance with the paragraph and policy numbers as contained in the published document. We would like the opportunity to represent our Client at the forthcoming Examination of the Core Strategy DPD and would be grateful for confirmation that this is possible.

2. Fairview New Homes have an interest in a parcel of land to the South West of Rayleigh Town Centre, as indicated on the attached site location plan. This land was previously identified in the Core Strategy Preferred Options documents to provide an urban extension to the south west of Rayleigh. This option has now been withdrawn in the Core Strategy Submission document and it is on this basis these representations are provided to the Council.

3. The Submission Core Strategy has been considered against the requirements set out at Paragraph 4.36 of PPS12 requiring core strategies to be justifiable and effective in order to be found sound, as follows:

Justified:

- i. Founded on a robust and credible evidence base
- ii. The most appropriate strategy when considered against the reasonable alternatives

Effective:

- i. Deliverable - the Core Strategy should show how the vision, objectives and strategy for the area will be delivered and by whom, and when, including who is responsible for implementing different elements of the strategy and when
- ii. Flexible - a strategy is unlikely to be effective if it cannot deal with changing circumstances. Plans should show how they will handle contingencies.
- iii. Able to be monitored - monitoring is essential for an effective strategy and will provide the basis on which the contingency plans within the strategy would be triggered.

4. To summarise our comments, Fairview New Homes strongly object to the Core Strategy as is currently presented on the basis the document is currently unsound for a number of reasons:

â€¢ The lack of robust and credible evidence base

â€¢ Failure to clearly discount reasonable alternatives

â€¢ The effectiveness of the plan is also considered to be flawed and the Council's approach to deliverability and flexibility is questioned.

5. Fundamentally, we question the soundness of the Core Strategy due to the lack of available evidence to support the choices made by the Council. In particular, there is a strong reliance on the findings of the 2009 Strategic Housing Land Availability Assessment (SHLAA) although it is understood this document is not due to be published for consideration alongside the Core Strategy. We, therefore, reserve the right to submit additional comments to the Core Strategy consultation following the publication of the SHLAA.

6. The 2009 SHLAA is clearly listed at Paragraph 1.29 of the submission Core Strategy as one of the evidence base documents the Council have drawn upon when drafting the Core Strategy. The documents listed are all considered to have played an important role in informing the Core Strategy. PPS12 also recognises at Paragraph 4.37 the importance of demonstrating how choices made in the plan are backed up by factual evidence identified in evidence base documents.

7. As a starting point it is important to state it is Fairview New Homes greatest concern there is no background provided within the Core Strategy document, or indeed any of the available evidence base documents, identifying why the Local Planning Authority has chosen to remove some of the sites previously proposed for housing development. In addition, there is also no justification as to why the retained urban extension sites are more suitable than those removed from the draft plan.

8. The following provides specific comments in response to the relevant areas of the Core Strategy.

Housing

9. It is stated at Paragraphs 4.10-4.12 that the Council have adopted a balanced approach when locating new housing between higher tier settlements and lower tier settlements. Although there is no detail provided as to how the Council

16616 Object

CHAPTER 8 Policy ENV4 - Sustainable Drainage System (SUDS)

intend on implementing this balanced approach or how the strategic allocation of housing contributes to the balance required. Our Client cannot support this approach until further detail is understood as to the proportion of housing being allocated to each settlement tier.

10. The proposed distribution of housing development during the plan period does not appear to be proportionately allocated between the various settlement tiers. We would argue that development should be distributed proportionately in line with the size of the settlement in order to benefit for available services and facilities. Rayleigh recognised as having best access to services within the district at Paragraph 2.68 of the Core Strategy. On this basis it is considered the development should primarily be directed to Rayleigh with a proportionate level of housing to the remaining settlements in the District.

Policy H1 - The efficient use of land for housing

11. In general the use of residential extensions to meet the remaining housing requirement that cannot be delivered through the redevelopment of appropriate previously developed land is supported by Fairview New Homes.

12. It is understood there is a need to prioritise use of brownfield land in line with national policy requirements but this needs to be a carefully balanced and realistic approach in identifying appropriate urban extensions to accommodate the majority of the District's housing, as identified in the table at Paragraph 4.6 and later at Paragraph 4.15.

13. Policy H1 sets out that the Council will seek the redevelopment of Rawreth Lane Industrial Estate, Foundry Industrial Estate, Stambridge Mills and Star Lane Industrial Estate. Without sight of the 2009 SHLAA it is not possible to understand whether the Council's choice to release employment land for housing is appropriate and Fairview New Homes cannot, therefore, support this element of Policy H1. This objection is further amplified by the fact additional employment land is required but is yet to be identified.

Policy H2 - Extensions to residential envelopes and phasing

14. The Council's intention to provide a balanced strategy for housing provision is mentioned again at Paragraph 4.18. The comments made at Paragraphs 9 and 10 above are also relevant in this respect.

15. In comparing the Preferred Options Core Strategy Document and Submission Core Strategy Document there is a significant reduction in the number of housing units being provided in urban extensions pre 2015, from 1450 dwellings to 775. From discussions with the Local Planning Authority it is understood the Council are seeking to provide the District's housing requirements by increased development densities. From the evidence available in the Submission Core Strategy and summary of SHLAA sites a number of the sites identified as urban extensions have in fact been allocated a reduced number of dwellings, including the land to the north of London Road, Rayleigh. We would, therefore, consider the approach taken by the Local Planning Authority to provide the required level of housing is untenable and unjustified.

16. In discounting preferred options PPS12 makes clear at Paragraph 4.38 the requirement for Local Planning Authorities to consider and evaluate reasonable alternatives. As set out above, the choices the Council have pursued have not been substantiated and without the consideration of reasonable alternatives the Core Strategy cannot be considered justified and therefore unsound.

17. However, this is our opinion based only on discussions with the Local Planning Authority rather than a thorough evidence base and we will consider the evidence in detail when it become available and provide further comment.

18. Paragraph 4.19 of the draft Core Strategy details the Council's primary factors in determining the location of future urban extensions. It is presumed the Council have assessed each of the proposed urban extension sites against the following criteria and that this information is contained within the SHLAA, although we have not been provided with any evidence of this to assess. It can be demonstrated that the land identified on the attached site location plan meets all of the requirements set out below.

â€¢ The proximity and relationship to existing centres, facilities, services

â€¢ The availability of infrastructure and/or the potential for additional infrastructure to be provided for development in such areas

â€¢ The potential to reduce private car dependency

â€¢ The potential to avoid areas of constraint (such as areas at risk of flooding, sites of ecological importance, public safety zone etc)

â€¢ The historical, agricultural and ecological value of land

â€¢ The impact on highway network (including availability and impact on existing network, as well as potential for improvements to be delivered)

â€¢ The relationship of development locations to the District's area of employment growth

â€¢ The potential to create a defensible Green Belt boundary

â€¢ The avoidance of coalescence with neighbouring settlements

19. In summary, Fairview's land is sustainably located in particularly close proximity to Rayleigh Town Centre and train station. In addition, the location of the land provides a natural extension and rounding of settlement boundary. An extension to Rayleigh in this location offers no opportunity for coalescence with neighbouring settlements nor does it constitute urban sprawl.

Core Strategy Submission Document

16616 Object

CHAPTER 8 Policy ENV4 - Sustainable Drainage System (SUDS)

Policy H2 - Extensions to residential envelopes and phasing

20. Although it is stated a flexible approach to the timings of the release of land will be maintain no explanation is provided as to why some sites are considered suitable for development pre 2015 and others post 2015. Paragraph 4.22 elaborates further to state a number of factors have been considered when determining the phasing of strategic housing sites although this information is not clearly available to assess.

21. As stated above the principle of releasing certain areas of greenbelt land is considered the best approach to meeting the Council's housing provision requirements. However, Fairview New Homes object to the omission of the land to the South West of Rayleigh for housing development as previously identified in the Core Strategy Preferred Options document. The site identified on the attached site location plan has been assessed against the Council's criteria, as set out at Paragraph 18 above and each requirement can be met. Without any clear explanation as to why this site has been discounted and the only other strategic housing site identified in Rayleigh is located further away from Rayleigh Town Centre and the associated services and facilities including the train station, Fairview New Homes object to Policy H2.

22. As considered at the outset of these representations the draft Core Strategy cannot be considered robust, and therefore sound, without clear justification and evidence base.

Policy H3 - Extension to residential envelopes post-2021

23. Policy H3 is supported on the basis that the release of greenbelt land is required for housing and this is the most appropriate approach to meet the Council's housing requirements, as set out at Paragraph 21 above.

24. However, it is unclear why some of the sites previously identified for housing development pre 2015 up until 2021 in the Preferred Options Core Strategy document have now been allocated for development post 2021, such as South East Ashingdon. It is stated at Paragraph 4.24 of the Submission Core Strategy document those areas identified for post 2021 development may not be immediately deliverable. However, there is no information available to understand why these sites are now no longer considered suitable for pre 2015 development as they were in December 2008. As a result, Fairview New Homes consider Policy H3 to be unjustified and therefore unsound.

Affordable Housing

25. The acute need for additional affordable housing is recognised at Paragraph 4.30. It is unclear from the draft Core Strategy document exactly how much affordable housing is required in the District in the plan period.

26. However, taking the starting point as set out at Paragraph 4.30 that the Thames Gateway South Essex Strategic Housing Market Assessment requires 131 net additional affordable dwellings per year which constitutes 52% of the District's overall annual housing target. In order to achieve this target using the Council's proposed policy requirement that new housing developments are to provide 35% affordable housing, 375 new dwellings would need to be developed each year. This calculation does not account for those developments with fewer than 15 dwellings which have no requirement to provide affordable housing or developments which cannot viably afford to provide non-market housing.

27. An annual requirement of 250 dwellings is identified at Paragraph 4.2 of the Core Strategy which would leave a significant short fall of affordable housing and act to compound the current situation. The approach taken by the Council ultimately accepts there will always be a shortfall in affordable housing provision and does not seek to redress this. We do not, therefore, consider this to be a robust or justified approach to achieving affordable housing in the District.

28. It is, therefore, considered in order to meet the District's affordable housing requirement additional housing land should be identified in order to ensure a wholesale increase in housing provision to address the Council's shortfall in affordable housing and meet the targets set for the plan period. The most appropriate and effective method by which to secure affordable housing provision is through developing large sites that are viably able to offer affordable housing units.

29. During the consultation of the submission Core Strategy the Council's Housing Strategy (2009) was not available and we reserve the right to make further comment on this document following the publication of this evidence.

The Green Belt

30. It is fully accepted by the Council that the Green Belt boundary is currently too tightly drawn and the release of some Green Belt land is necessary to meet the District's development requirements. However, it needs to be demonstrated that the areas of Green Belt land to be lost are justified and located in the most appropriate area and that areas of release land do not undermine the principle of the Green Belt.

31. It is understood from Paragraph 6.7 of the Submission Core Strategy the Council will seek to examine the degree to which current Green Belt land is helping to achieve the purposes of the Green Belt when considering reallocating land. However, areas of Green Belt are proposed to be reallocated for urban extensions prior to this research being undertaken.

Core Strategy Submission Document

O - 16616 - 5219 - Policy ENV4 - Sustainable Drainage System (SUDS) - i, ii

16616 Object

CHAPTER 8 Policy ENV4 - Sustainable Drainage System (SUDS)

32. Fairview New Homes fully support the justified retention of the areas of Green Belt where appropriate and the release of Green Belt land where needed. However, at present the proposed Housing policies and Green Belt policies are not coherent and the reallocation of certain areas of Green Belt is not based on a credible evidence base.

Environmental Issues

Policy ENV4 - Sustainable Drainage Systems (SUDS)

33. Fairview New Homes would like to support the flexibility contained within Policy ENV4 which recognises it is not always viably possible to incorporate SUDS in all developments.
Policy ENV8 - On Site Renewable and Low Carbon Energy Generation

34. We would also like to support Policy ENV8 on the same basis as Policy ENV4 in that it is important that the production of energy from renewable or low carbon sources is only required where it is viably possible so as not to resulting in developments not coming forward.

Transport

Policy T8 - Parking Standards

35. Fairview New Homes object to Policy T8 as it is currently contrary to National Policy requirements as set out in PPG13 which contains maximum parking standards. Indeed, this is recognised at Paragraph 10.27 of the Submission Core Strategy document. Enforcing minimum parking standards is not consistent with local or national sustainability aims and should not be an approach pursued by the Council.

Summary:

Environmental Issues

Policy ENV4 - Sustainable Drainage Systems (SUDS)

33. Fairview New Homes would like to support the flexibility contained within Policy ENV4 which recognises it is not always viably possible to incorporate SUDS in all developments.

Change to Plan

Appear at exam? Yes

Soundness Tests i, ii

Core Strategy Submission Document

16855 Object

CHAPTER 8 Policy ENV4 - Sustainable Drainage System (SUDS)

Respondent: Environment Agency (Miss Carrie Williams) [9889] **Agent:** N/A

Environment Agency
Iceni House
Cobham Road
Ipswich
Suffolk
IP3 9JD
United Kingdom
01473 706007

Full Text: Policy ENV4 is not consistent with the requirements of Approved Document H (2002) of the Building Regulations, 2000, as amended. This Approved Document H requires a drainage hierarchy to be considered for all development and priority is given to the discharge of surface water run-off using SuDS techniques.

This approach is supported by national Policy in PPS25 at paragraphs F6 and F8.

The policy must be reworded to require all developments to incorporate SuDS where possible.

Please note that should the Inspector deem it necessary for us to attend the Examination in Public, we would be happy to do so but our preferred method at this time would be written representations.

Summary: Policy ENV4 is not consistent with the requirements of Approved Document H (2002) of the Building Regulations, 2000, as amended. This Approved Document H requires a drainage hierarchy to be considered for all development and priority is given to the discharge of surface water run-off using SuDS techniques.

This approach is supported by national Policy in PPS25 at paragraphs F6 and F8.

Please note that should the Inspector deem it necessary for us to attend the Examination in Public, we would be happy to do so but our preferred method at this time would be written representations.

Change to Plan

The policy must be reworded to require all developments to incorporate SuDS where possible.

Appear at exam? No **Soundness Tests** iii

Core Strategy Submission Document

S - 16882 - 8329 - Policy ENV4 - Sustainable Drainage System (SUDS) - None

16882 Support

CHAPTER 8 Policy ENV4 - Sustainable Drainage System (SUDS)

Respondent: Swan Hill Homes Limited [8329]

Swan Hill Homes Limited
C/O Agent
Mr P Kneen
Charles Planning

Agent: Charles Planning Associates Ltd (Mr P Kneen) [5040]

Charles Planning Associates Ltd
1644-1645 Parkway
Solent Business Park
Whiteley
Fareham
Hampshire
PO15 7AH
01489 580853

Full Text:

1.0 Instruction and Introduction

1.1 Charles Planning Associates Limited (Chartered Town Planners) is Instructed by Swan Hill Homes Limited (Swan Hill) to prepare and submit representations on their behalf in respect of the Rochford District Local Development Framework: Core Strategy Submission (September 2009) Development Plan Document.

1.2 The comments refer to the relevant sections and policy designations in the Submission document, as appropriate.

1.3 The comments set out in this submission are intended to assist the District Council in taking forward its Local Development Framework. It is our intention to continue to be involved in the LDF preparation process and we look forward to the opportunity to comment further at the Examination to the Core Strategy.

1.4 If you have any queries regarding the content of this submission then please do not hesitate to contact:

Peter Kneen BSc (Hons) MSc MRTPI
Planner

2.0 Housing:
Policy H1 - The Efficient Use of Land for Housing

2.1 Swan Hill recognises the importance of seeking to concentrate new developments mainly in the existing urban areas, on previously developed land where possible, particularly in view of the Government seeking to ensure 60% of all such new developments are on previously development land (PDL).

2.2 However, given the character of the District, and the strategic housing requirement of the East of England Plan, Swan Hill supports the approach that the Council must also make provision for additional development on the edge of existing settlements on greenfield sites, particularly in the most sustainable locations. As such, Swan Hill supports that where feasible, the redevelopment of existing employment sites for residential/employment purposes can make a contribution towards the strategic housing requirement, provided that sufficient additional employment land is brought forward to ensure the stability of employment levels in the District, and to ensure employment growth meets the East of England Plan requirements.

2.3 Swan Hill considers that Policy H1 should include consideration that new extensions to existing settlements have regard to their potential impact on the wider characteristics and openness objectives of the Green Belt.

Policy H2 - Extensions to Residential Envelopes and Phasing

2.4 Swan Hill generally supports the approach taken by the Council in this policy. As set out above, Swan Hill consider the Council's acknowledgment that housing requirements should be met through the allocation of land on the edge of the existing settlements is the most suitable way forward to meeting the Council's strategic housing requirement and complies with the advice in PPS3.

2.5 The need for suitable greenfield urban extensions represents the best way forward for the Council to meet its strategic housing requirement, as set out in the East of England Plan. Swan Hill supports the recognition that the potential supply of alternative previously developed sites is limited, without detrimentally affecting the character of the District, and therefore the best way forward is the use of sustainable greenfield urban extensions to the existing settlements of the District.

2.6 However, Swan Hill consider that a fundamental consideration that the District Council should consider relates to the potential impact of the urban extensions on the Green Belt policy has been somewhat overlooked. The wider sustainability credentials of the settlements of the District should only be one of many key considerations for determining the level of expansion. In view of the proximity of Southend-on-Sea to all the main settlements of the District, and the influence this has on the likely location many people would travel for employment and leisure, sustainability of many of the settlements is not a key overarching factor, and greater weight should be placed on the potential impact on the openness of the Green Belt, as this cannot be remedied if development occurs in the wrong location.

2.7 As such, Swan Hill considers that determining the location of growth for the main settlements should be to identify

Core Strategy Submission Document

S - 16882 - 8329 - Policy ENV4 - Sustainable Drainage System (SUDS) - None

16882 Support

CHAPTER 8 Policy ENV4 - Sustainable Drainage System (SUDS)

those locations where the impact on the wider setting of the Green Belt can be minimised. Further justification for those general locations chosen should be identified in Policy H2. In this regard, Swan Hill has serious concerns regarding the removal of Land South West of Great Wakering as a viable option for the growth of the settlement. The development of this area of Great Wakering, in addition to the potential redevelopment of the Star Lane Industrial Estate could provide a more comprehensive development, whilst ensuring that the wider openness of the Green Belt is maintained. Land South West of Great Wakering is significantly better placed to limit the impact on the wider Green Belt than Land West of Great Wakering, and could contribute to the provision of an important amenity and wildlife site for the local community.

2.8 In addition, Swan Hill consider that the Council now has no reserve provision in the event that any of the existing employment sites set out in Policy H1 fail to come forward for development within the envisaged timescale. Further, Land West of Great Wakering has not been identified in the SHLAA as a deliverable site to help meet the strategic housing requirement, contrary to the requirement set out in PPS3.

2.9 As such, Swan Hill would support the provision of suitable sites which could be safeguarded for future development in the likelihood of a shortfall in supply.

Policy H3 - Extensions to Residential Envelopes Post 2021

2.10 As set out above, Swan Hill supports the overall approach the Council has taken towards the provision of sustainable urban extensions as a suitable means of meeting their strategic housing requirement. However, as set out for Policy H2 above, Swan Hill has serious concerns regarding the removal of several proposed sites set out in the October 2008 Preferred Options Core Strategy, without any guarantee of the ability to deliver those sites set out in Policy H1.

2.11 As also considered above, the inclusion of West of Great Wakering for 250 dwellings should not be included ahead of South West of Great Wakering, in view of the fact that the site is not identified in the SHLAA as available, suitable and achievable as required by PPS3, and thus is not supported by a robust and creditable evidence base for its inclusion as a strategic site for development.

2.12 Whilst Swan Hill acknowledge that alterations to Policy H1 has resulted in the removal of some locations for growth in Policy H3 (as set out in the Sustainability Appraisal), Swan Hill does not consider that the most appropriate locations have been chosen.

2.13 In addition to the matters raised above, the use of West of Great Wakering would also result in the loss of valuable agricultural land, which clearly in a Green Belt location, should be less suitable for development than other sites, such as South West of Great Wakering, which would have limited impact on the wider Green Belt policy, and not result in the loss of valuable agricultural land.

2.14 Finally, in respect of Policies H1, H2 and H3, all of the above comments are based on our interpretation of the Submission Version Core Strategy when compared to the October 2008 Version of the Core Strategy. Without the ability to undertake a detailed assessment of the Council's SHLAA, it is not possible to clarify the proposed Core Strategy position regarding the proposed direction of growth proposed for the settlements in the District. As such, Swan Hill reserves the right to make additional representations regarding the proposed Policies H1, H2 and H3 following the publication of the SHLAA in due course.

Policy H4 - Affordable Housing

2.15 In general terms, Swan Hill supports the approach taken by the Council towards the provision of affordable housing for new residential developments. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H5 - Dwelling Types

2.16 Swan Hill supports the policy provision of H5, and considers that the approach taken by the Council for this policy represents a suitably flexible alternative to stipulating percentages of dwelling mix, sought by some local authorities. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H6 - Lifetime Homes

2.17 In regard to this policy, Swan Hill objects to the Council's policy where all new dwellings should be provided to the Lifetime Homes Standard. Whilst it is acknowledged that the UK has an aging population, Swan Hill considers that seeking to provide Lifetime Homes on all sites is considered to be overly onerous for proposed developers, particularly when considering the requirement for all car parking spaces to be suitable for disabled users, which could result in more schemes becoming unviable. Therefore, the provision of a percentage of Lifetime Homes should be considered through negotiations with the Council at the planning application stage, and should be determined on a case-by-case basis.

3.0 Character of Place: Policy CP1 - Design

Core Strategy Submission Document

S - 16882 - 8329 - Policy ENV4 - Sustainable Drainage System (SUDS) - None

16882 Support

CHAPTER 8 Policy ENV4 - Sustainable Drainage System (SUDS)

3.1 The Town and Country Planning (General Development Procedure) Order 1995 (As Amended) makes the submission of a Design and Access Statement for most types of planning applications a Statutory requirement, and as such, the provision of a Design Brief represents a pre-requisite of all major planning applications.

3.2 Policy CP1 seeks to ensure the provision of good, high quality developments that reflect local characteristics and distinctiveness, this ideology is supported by Swan Hill.

4.0 The Green Belt:
Policy GB1 - Green Belt Protection

4.1 Following the amendments to the wording of the Policy since the October 2008 Preferred Options Core Strategy, Swan Hill is now generally supportive of Policy GB1 and its supporting text. However, as expressed above, it is important that where alterations to the Green Belt boundary occur as a result of the extension of the settlements to meet the strategic housing requirement, both the minimal amount of land is taken and where that land is taken for development, it represents the best available land which has a minimal impact of the wider openness characteristic of the Green Belt.

5.0 Environmental Issues:
Policy ENV3 - Flood Risk

5.1 Swan Hill generally supports the approach set out in Policy ENV3 regarding ensuring development accords with the sequential test of PPS25. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV4 - Sustainable Drainage Systems (SUDS)

5.2 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV4. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV8 - On-site Renewable and Low Carbon Energy Generation

5.3 Whilst Swan Hill recognises the importance of reducing carbon emissions, particularly in new housing developments, and the role this can play in reducing the nations overall Greenhouse emissions. As such Swan Hill is generally supportive of Policy ENV8. It is noted that Policy ENG1 of the East of England Plan sets out a threshold of developments comprising 10 or more dwellings. Swan Hill consider it important for the District Council to justify the reduction in the threshold level.

5.4 Further, no assessment of Policy ENV8 has been set out in the Sustainability Appraisal which justifies the change in threshold from that of Policy ENG1 of the RSS.

Policy ENV9 - Code for Sustainable Homes

5.5 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV9. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

6.0 Community Infrastructure, Leisure and Tourism:
Policy CLT1 - Planning Obligations and Standard Charges

6.1 Swan Hill generally supports the overall approach the Council has taken in Policy CLT1. It is considered Policy CLT1 sets out a degree of flexibility to ensure that all sites are considered on a site-by-site basis, assessing the individual merits of each planning application, in order to ensure the levels of contributions applicable meet the five tests of Circular 05/05. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policies CLT5 - Open Space;
CLT7 - Play Space;
CLT8 - Youth Facilities; and,
CLT10 - Playing Pitches

6.2 Swan Hill supports the need for new residential developments to incorporate a degree of new publicly accessible open space, children's play space, youth facilities and playing pitches, and as such, generally supports the policy approaches taken by the Council.

6.3 However, it is important that whilst the Council may seek to undertake an assessment of providing standard charges for new development, which, as set out in Policy CLT1, this should be based on thorough public consultation and consideration and sound justification. Swan Hill consider that within the provision of a standard charge, it is important that such provision allows for a degree of flexibility to ensure that each site is assessed individually and on its own merits. This is particularly important for those sites close to existing open spaces and facilities. As such, the levels of

Core Strategy Submission Document

S - 16882 - 8329 - Policy ENV4 - Sustainable Drainage System (SUDS) - None

16882 Support

CHAPTER 8 Policy ENV4 - Sustainable Drainage System (SUDS)

open space and recreation facilities required in the 'standard charge' should be based on an up-to-date PPG17 Open Space assessment, which should be used to form a key consideration in the levels of provision likely to be required in the standard charge system proposed.

7.0 Transport: Policy T1 - Highways

7.1 Swan Hill supports the overall objectives set out in Policy T1 requiring developments to be located and designed to reduce the reliance on the private car and to meet the infrastructure needs generated by development or seek to help achieve these needs is acceptable in principle.

7.2 Swan Hill recognises the importance of providing sufficient infrastructure provision to meet the requirements of development, and that where developments have insufficient consideration of impact on existing infrastructure, they should be considered unacceptable and contrary to National policy guidance. However, Swan Hill considers it important to emphasise that the developer's role should not be seen as a means to meet existing shortfalls in provision.

Policy T3 - Public Transport

7.3 Swan Hill is generally supportive of the policy approach set out in T3, however, as set out in paragraph 7.2 above, it is important that the District Council do not consider that it is the developer's responsibility to resolve existing shortfalls in provision of public transport, and any contribution towards additional public transportation provision should only be to mitigate against the additional level of demand likely from the development proposed.

Policy T5 - Cycling and Walking

7.4 Swan Hill supports the general approach to this policy, as Swan Hill recognises the importance of promoting the use of alternatives to the private car. The policy provision acknowledges the need to ensure relevant contributions in the event of additional travel demands generated by individual developments, whilst also setting out additional aspirations for the cycle network in the District.

7.5 As such, Swan Hill considers this policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy T8 - Parking Standards

7.6 The Council has recently (January 2007) adopted SPD on the requirements for parking standards, and as such, Swan Hill generally supports the policy approach chosen by the Council. As set out in the SPD, whilst Swan Hill generally supports the approach taken by the District Council towards setting residential parking standards, in that the Council has recognised that in the suburban areas, even with some access to public transport, the majority of residents will rely on the use of private cars. However, Swan Hill has concerns over the failure of the District Council to comply with the provisions of PPG13: Transport (2001) which sets out that Local Planning Authorities should not set minimum standards for car parking. Whilst it is acknowledged that PPS3 sets out provision for the consideration of local circumstances, it is considered that the Council has not justified this deviation from PPG13's maximum standard.

7.7 Whilst it is acknowledged that such justification may become apparent through the work currently being undertaken by Essex County Council, until such time, the District Council should only seek to apply the maximum standards indicated in PPG13. However, Swan Hill recommends that the District Council make provisions in the wording of the Policy to allow for changes in the event that future policy on car parking standards need to reflect the County standard, following the completion of the County Council review.

8.0 Economic Development: Policies ED3 - Existing Employment Land ED4 - Future Employment Allocations

8.1 In respect of Policies ED3 and ED4, Swan Hill notes that they have changed considerably since the October 2008 Preferred Options document, in that they are site specific regarding the location of the proposed redevelopment of existing employment sites. These four sites are also identified in Policy H1 - Efficient Use of Land, and in general, Swan Hill supports the approach to the redevelopment of these sites (where feasible) based on the assessments of the sites set out in this version of the Core Strategy.

8.2 However, Swan Hill has concerns that these policies might not be considered suitably sound given that insufficient opportunity has been allocated for consultation on their redevelopment. Without the SHLAA being publically available prior to the consultation on this Core Strategy, an insufficient evidence base has been provided to corroborate that these sites are neither suitable or deliverable to meet the test of soundness requirements.

Summary:

Policy ENV4 - Sustainable Drainage Systems (SUDS)

5.2 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV4. The Policy accords with the advice of National Policy and is therefore considered

Core Strategy Submission Document

16882 Support

CHAPTER 8 Policy ENV4 - Sustainable Drainage System (SUDS)

sound by Swan Hill.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

Core Strategy Submission Document

S - 15983 - 13441 - Air Quality Management Areas, 8.27 - None

15983 Support

CHAPTER 8 Air Quality Management Areas, 8.27

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: The Car Share Scheme's relevance to district-wide spatial planning is unclear

Summary: The Car Share Scheme's relevance to district-wide spatial planning is unclear

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 15984 - 13441 - Policy ENV5 - Air Quality - None

15984 Support

CHAPTER 8 Policy ENV5 - Air Quality

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: The policy may be unnecessarily restrictive. It assumes there is a cause and effect relationship between poor air quality and all residential development.

Summary: The policy may be unnecessarily restrictive. It assumes there is a cause and effect relationship between poor air quality and all residential development.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16122 - 7984 - Policy ENV5 - Air Quality - None

16122 Support

CHAPTER 8 Policy ENV5 - Air Quality

Respondent: Hockley Parish Plan Group (Mr T Gleadall) [7984] **Agent:** N/A

Hockley Parish Plan Group
2 Wood End
Hockley
Essex
SS5 4QL

01702 202892

Full Text: Hockley must remain pollution free in terms of air quality, noise lighting, and mobile phone masts. This is particularly important following Southend Airport's expansion planning application.

Summary: Hockley must remain pollution free in terms of air quality, noise lighting, and mobile phone masts. This is particularly important following Southend Airport's expansion planning application.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 15985 - 13441 - Renewable Energy, 8.32 - None

15985 Support

CHAPTER 8 Renewable Energy, 8.32

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: The Council's support for renewable energy is welcome, however the determination of "adverse visual impacts" is subjective. You might want to take a view on identifying a link to the infrastructure requirements identified in Appendix CLT1.

Summary: The Council's support for renewable energy is welcome, however the determination of "adverse visual impacts" is subjective. You might want to take a view on identifying a link to the infrastructure requirements identified in Appendix CLT1.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 15986 - 13441 - Renewable Energy, 8.33 - None

15986 Support

CHAPTER 8 Renewable Energy, 8.33

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: The Council's support for renewable energy is welcome.

Summary: The Council's support for renewable energy is welcome.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 15987 - 13441 - Renewable Energy, 8.35 - None

15987 Support

CHAPTER 8 Renewable Energy, 8.35

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: The Council's support for renewable energy is welcome.

Summary: The Council's support for renewable energy is welcome.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 15988 - 13441 - Policy ENV6 - Large Scale Renewable Energy Projects - None

15988 Support

CHAPTER 8 Policy ENV6 - Large Scale Renewable Energy Projects

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: The Council's support for renewable energy is welcome, however the determination of "adverse visual impacts" is subjective. You might want to take a view on identifying a link to the infrastructure requirements identified in Appendix CLT1.

Summary: The Council's support for renewable energy is welcome, however the determination of "adverse visual impacts" is subjective. You might want to take a view on identifying a link to the infrastructure requirements identified in Appendix CLT1.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16223 - 9935 - Policy ENV6 - Large Scale Renewable Energy Projects - i, iii

16223 Object

CHAPTER 8 Policy ENV6 - Large Scale Renewable Energy Projects

Respondent: CPREssex (Mrs Valerie Stanton) [9935]

Agent: N/A

CPREssex
Hillcrest Farm
Lark Hil Road
Canewdon
SS4 3RZ
Essex

Full Text: This policy on Large Scale Renewable Energy Projects seems too be rather weak. The impact of any such development can be considerable, not only in areas already well protected, but also on the landscape/countryside in general.

Summary: This policy on Large Scale Renewable Energy Projects seems too be rather weak. The impact of any such development can be considerable, not only in areas already well protected, but also on the landscape/countryside in general.

Change to Plan The Policy is unsound as it does not give sufficient proection to areas outside those with special protection.

CPREssex would like an extra bullet point to be added to read 'does not impact on the charactor of the lanscape or biodiversity'.

Appear at exam? No

Soundness Tests i, iii

Core Strategy Submission Document

O - 16224 - 8650 - Policy ENV6 - Large Scale Renewable Energy Projects - i, ii, iii

16224 Object

CHAPTER 8 Policy ENV6 - Large Scale Renewable Energy Projects

Respondent: Countryside Properties (Southern) Ltd (Mr Steve Price) [8650] **Agent:** N/A

Countryside Properties (Southern) Ltd
Countryside House
The Drive
Brentwood
Essex
CM13 3AT
01277260000

Full Text: Representations to Policies ENV 6, 7 and 8

Unsound: (i) not consistent with national policy (ii) not justified: not found on a robust evidence base, and (iii) not effective; not deliverable/flexible.

The requirements of these policies are generally, in principle, reasonable.

However we have several points of concern/issues.

1. Regarding the statement in paragraph 8.32 that "the use of biomass heating will not be supported...." A policy (or in this case a supporting statement to the policy) should not be prescriptive with regard to technologies. Technology and product innovation is advancing so quickly that this reference is not applicable with the majority of products on the market.

Furthermore, Building Regulations Parts F and L recently consulted on, and Part J now subject to consultation do not discriminate against such systems. According, flexibility in approaches should be upheld and specific quality metrics applied through Building Regulations and the CSH, and not planning policy. This will ensure that the most sustainable technologies are employed, by way of example 'Pyrolysis' would not be allowed, with the Core Strategy in its current form. There are no detrimental affects with regard to air quality when running such plant. Indeed, this plant runs on municipal waste, rubber tyres etc and biofuels.

Changes necessary to make the Core Strategy sound

The statement that "the use of biomass heating will not be supported...." should be deleted from paragraph 8.32. This section should accord with the flexible principles outlined in PPS1 and its supplement.

2. Given the current consultation of the Definition of Zero Carbon Homes, it is particularly difficult to comment on the proposals outlined. Indeed, CSH must also be revised to align with the regulatory definition of a zero carbon, as will the recent consultation documents for SAP, Part F and L of Building Regulations and the current Part J consultation.

We agree with principles of the Governments 'Energy Hierarchy' as far the energy efficiency measures are concerned, but we do not believe the incorporation of on-site renewable energy equipment to reduce predicted CO2 emissions by at least 10% above and beyond Building Regulations requirement, or indeed a district energy solution is most satisfactory manner to reduce emissions.

This view is substantiated by UK-GBC (in its 'Definition of Zero Carbon Report' May 2008), the First London Report 'Cutting the Capital's Carbon Footprint - Delivering Decentralised Energy' and much ongoing research. For example, we are currently working with the UK-GBC and the Zero Carbon Hub 'District Sustainable Infrastructure - Task Group' and will be reporting our findings to Ministers in late November 2009. Whilst, we cannot share the details of the draft reports, it can be stated that flexibility in the planning of developments must be maintained.

The principle of decreasing CO2 emissions by targeting reductions through energy efficiency measures is favoured by the CLG (as described in the December 2008 Zero Carbon consultation document).

Decreasing the operational carbon emissions of the site by reducing the heat demands of each dwelling has the benefit of reduced fuel bills for the occupiers. This will also improve the rating of the Energy Efficiency index on each Energy Performance Certificate (EPC), making these dwellings more appealing to potential residents, and attracting residents concerned with energy conservation.

Schemes which utilise CHP and renewable energy generated heat, such as biomass, whilst decreasing CO2 emissions by offsetting inefficient electricity production and burning 'green' fuel will actually increase the fuel bills for the residents.

Reducing the fundamental base heat demands is the only fail-safe way of keeping the heating costs down in the dwellings. This is imperative for the affordability of all dwellings, as it safeguards against fuel poverty in a volatile fuel market. Furthermore, renewable energy and CHP installations are cost intensive and they often diminish funds that could otherwise go towards fabric enhancement.

Core Strategy Submission Document

O - 16224 - 8650 - Policy ENV6 - Large Scale Renewable Energy Projects - i, ii, iii

16224 Object

CHAPTER 8 Policy ENV6 - Large Scale Renewable Energy Projects

CHP and renewables, whilst technically reducing CO2 emissions, do nothing to decrease the energy demands of a dwelling, and often actually conceal a less efficient building.

Furthermore the extensive below ground heating pipework network required on most sites is more prone to heat loss and leakage. The installation of private heating pipework within adoptable roads creates issues of responsibility which are still not fully resolved within the UK.

District heating maybe more suited to high/super density developments that have a balanced load profile (a mix of uses). Although, as proven by the UK-GBC, in its 'Definition of Zero Carbon Report' May 2008, some 80% of schemes would not be deliverable. Subsequently, CLG has consulting on the 1. Energy efficiency 2. Carbon compliance and; Allowable solutions approach - to date no definitive policy has been announced.

Whilst, it is not possible to guess the outcome of the many consultations, our (and our) peer group view (shared with CLG, DBERR and DEFRA, DECC and Treasury through meetings arranged by invitation) is that the allowable solutions (depending on the cost of carbon) with the Energy efficiency measures will form future policy and regulations.

District heating systems have inherent issues of accountability. This is fuelled by occupiers perceiving little control over their heating bills and the lack of choice (e.g. lock-in) for the supply of heat. Additionally, combined heat and power only becomes financially viable if the power can be utilised on site (private wire system) as current policy dictates that exporting to the grid is not economically viable.

Private wire systems lock users into one supplier and after a recent European court (Citiworks) case, the whole legality of private wire in the UK is now uncertain - this is subject to further DECC/CLG(?) consultation later this year. The proposed individual/local heating systems and individual utility supplies give occupants the freedom of choice.

With regard to Policy ENV 8, whilst we are pleased to see that measures will not be required if "not feasible or viable", but it is not clear that this statement has had regard to the overall costs of bringing sites to the market (including the costs of any necessary supporting infrastructure) and the need to avoid any adverse impact of development on the needs of the community etc. The definition of "feasibility" needs to be a broad one, and include technological viability as well as commercial drivers.

Summary:

These policies must be underpinned by viability testing. It should be stated that the level/extent of renewable energy or energy generation measures applicable to any development site will be assessed against an evidence-based understanding of local feasibility and viability and the potential for the delivery of sustainable technologies/measures on the particular site. When considering which measures are to be provided on a site, the cost implications of the infrastructure needs of that site will need to be considered in the round.

Change to Plan

It is strongly recommended that more detailed consideration is given to the requirements of Policies ENV6, ENV7 and ENV 8 before adopting such measures.

These policies must be underpinned by viability testing. It should be stated that the level/extent of renewable energy or energy generation measures applicable to any development site will be assessed against an evidence-based understanding of local feasibility and viability and the potential for the delivery of sustainable technologies/measures on the particular site. When considering which measures are to be provided on a site, the cost implications of the infrastructure needs of that site will need to be considered in the round.

Viability/feasibility work will be undertaken by the local authority to define appropriate targets and measures for each site, including strategic Greenfield sites.

It should be made clear that any requirements for sustainability/energy conservation and generation measures should be linked to the national policy applicable at the time (at the time of a planning application or any previous Design Brief or Master Plan, Concept Statement which sets the requirements for that particular site) and have regard to viability/feasibility work.

Appear at exam? Yes

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 16845 - 7704 - Policy ENV6 - Large Scale Renewable Energy Projects - iii

16845 Object

CHAPTER 8 Policy ENV6 - Large Scale Renewable Energy Projects

Respondent: English Heritage (Ms K Fletcher) [7704]

Agent: N/A

English Heritage
Brooklands
24 Brooklands Avenue
Cambridge
CB2 2BU

Full Text: ROCHFORD LOCAL DEVELOPMENT FRAMEWORK
CORE STRATEGY SUBMISSION DOCUMENT

Thank you for your letter dated 21 September 2009 consulting English Heritage on the above document. Our comments are set out below.

CHAPTER 4 HOUSING

Vision and objectives

While we note that character of place is addressed in chapter 5, it is important that this consideration is recognised as relevant within the Housing chapter. Paras 2.33, 2.69 and 2.73 also recognise the importance of character and sense of place in the built environment. We recommend that this consideration should be integrated into the vision and objectives for housing in order to improve the clarity of the plan, and its consistency with advice in PPS1.

Recommendation:

The following amendments are suggested:

- Vision in five years: add 'settlement character' after 'infrastructure'
- Vision by 2025: add 'and places' after 'communities' in bullet 1
- Objectives: In objective 2 amend to '...sustainable locations, enhancing sense of place and having regard to..'
- Para 4.19: Amend bullet 5 to read 'The historical, agricultural and ecological value of land, and settlement character'

CHAPTER 5 CHARACTER OF PLACE

We strongly support this section and policies CP1, CP2 and CP3. In the absence of policy coverage for listed buildings and scheduled monuments we recommend that para 5.9 should refer to PPGs 15 and 16, as well as draft PPS15.

CHAPTER 8 ENVIRONMENTAL ISSUES

We welcome the references the historic environment in the objectives and in policies ENV1 and ENV2.

Policy ENV6 Large Scale Renewable Energy Projects

We consider that this policy should refer to the historic interest of sites to reflect the advice in PPS22 more appropriately.

Recommendation: amend the first bullet in policy ENV6 to read '...it's ecological, historic or landscape value...'

CHAPTER 11 ECONOMIC DEVELOPMENT

Policy ED2 London Southend Airport

We understand that the grade I listed church in the vicinity of the runway will be protected in any proposals for expansion of the airport and the Core Strategy policy does not suggest otherwise. We will respond to the detail of proposals for the airport through responses to consultations on the Joint Area Action Plan and any planning applications.

In the interests of clarity, the above comments where we suggest changes to the Core Strategy should be recorded as objections to the soundness of the plan in terms of consistency with national guidance. However, we hope that it will be possible to agree amendments on these points prior to the public examination.

We would be happy to discuss any of these comments if you would find this useful.

Summary: Policy ENV6 Large Scale Renewable Energy Projects

We consider that this policy should refer to the historic interest of sites to reflect the advice in PPS22 more appropriately.

Change to Plan Recommendation: amend the first bullet in policy ENV6 to read '...it's ecological, historic or landscape value...'

Appear at exam? Not Specified **Soundness Tests** iii

Core Strategy Submission Document

S - 15989 - 13441 - Policy ENV7 - Small Scale Renewable Energy Projects - None

15989 Support

CHAPTER 8 Policy ENV7 - Small Scale Renewable Energy Projects

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: The Council's support for renewable energy is welcome.

Summary: The Council's support for renewable energy is welcome.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16225 - 8650 - Policy ENV7 - Small Scale Renewable Energy Projects - i, ii, iii

16225 Object

CHAPTER 8 Policy ENV7 - Small Scale Renewable Energy Projects

Respondent: Countryside Properties (Southern) Ltd (Mr Steve Price) [8650] **Agent:** N/A

Countryside Properties (Southern) Ltd
Countryside House
The Drive
Brentwood
Essex
CM13 3AT
01277260000

Full Text: Representations relate to policies ENV6, 7 and 8

Unsound: (i) not consistent with national policy (ii) not justified: not found on a robust evidence base, and (iii) not effective; not deliverable/flexible.

The requirements of these policies are generally, in principle, reasonable.

However we have several points of concern/issues.

1. Regarding the statement in paragraph 8.32 that "the use of biomass heating will not be supported...." A policy (or in this case a supporting statement to the policy) should not be prescriptive with regard to technologies. Technology and product innovation is advancing so quickly that this reference is not applicable with the majority of products on the market.

Furthermore, Building Regulations Parts F and L recently consulted on, and Part J now subject to consultation do not discriminate against such systems. According, flexibility in approaches should be upheld and specific quality metrics applied through Building Regulations and the CSH, and not planning policy. This will ensure that the most sustainable technologies are employed, by way of example 'Pyrolysis' would not be allowed, with the Core Strategy in its current form. There are no detrimental affects with regard to air quality when running such plant. Indeed, this plant runs on municipal waste, rubber tyres etc and biofuels.

Changes necessary to make the Core Strategy sound

The statement that "the use of biomass heating will not be supported...." should be deleted from paragraph 8.32. This section should accord with the flexible principles outlined in PPS1 and its supplement.

2. Given the current consultation of the Definition of Zero Carbon Homes, it is particularly difficult to comment on the proposals outlined. Indeed, CSH must also be revised to align with the regulatory definition of a zero carbon, as will the recent consultation documents for SAP, Part F and L of Building Regulations and the current Part J consultation.

We agree with principles of the Governments 'Energy Hierarchy' as far the energy efficiency measures are concerned, but we do not believe the incorporation of on-site renewable energy equipment to reduce predicted CO2 emissions by at least 10% above and beyond Building Regulations requirement, or indeed a district energy solution is most satisfactory manner to reduce emissions.

This view is substantiated by UK-GBC (in its 'Definition of Zero Carbon Report' May 2008), the First London Report 'Cutting the Capital's Carbon Footprint - Delivering Decentralised Energy' and much ongoing research. For example, we are currently working with the UK-GBC and the Zero Carbon Hub 'District Sustainable Infrastructure - Task Group' and will be reporting our findings to Ministers in late November 2009. Whilst, we cannot share the details of the draft reports, it can be stated that flexibility in the planning of developments must be maintained.

The principle of decreasing CO2 emissions by targeting reductions through energy efficiency measures is favoured by the CLG (as described in the December 2008 Zero Carbon consultation document).

Decreasing the operational carbon emissions of the site by reducing the heat demands of each dwelling has the benefit of reduced fuel bills for the occupiers. This will also improve the rating of the Energy Efficiency index on each Energy Performance Certificate (EPC), making these dwellings more appealing to potential residents, and attracting residents concerned with energy conservation.

Schemes which utilise CHP and renewable energy generated heat, such as biomass, whilst decreasing CO2 emissions by offsetting inefficient electricity production and burning 'green' fuel will actually increase the fuel bills for the residents.

Reducing the fundamental base heat demands is the only fail-safe way of keeping the heating costs down in the dwellings. This is imperative for the affordability of all dwellings, as it safeguards against fuel poverty in a volatile fuel market. Furthermore, renewable energy and CHP installations are cost intensive and they often diminish funds that could otherwise go towards fabric enhancement.

Core Strategy Submission Document

O - 16225 - 8650 - Policy ENV7 - Small Scale Renewable Energy Projects - i, ii, iii

16225 Object

CHAPTER 8 Policy ENV7 - Small Scale Renewable Energy Projects

CHP and renewables, whilst technically reducing CO2 emissions, do nothing to decrease the energy demands of a dwelling, and often actually conceal a less efficient building.

Furthermore the extensive below ground heating pipework network required on most sites is more prone to heat loss and leakage. The installation of private heating pipework within adoptable roads creates issues of responsibility which are still not fully resolved within the UK.

District heating maybe more suited to high/super density developments that have a balanced load profile (a mix of uses). Although, as proven by the UK-GBC, in its 'Definition of Zero Carbon Report' May 2008, some 80% of schemes would not be deliverable. Subsequently, CLG has consulting on the 1. Energy efficiency 2. Carbon compliance and; Allowable solutions approach - to date no definitive policy has been announced.

Whilst, it is not possible to guess the outcome of the many consultations, our (and our) peer group view (shared with CLG, DBERR and DEFRA, DECC and Treasury through meetings arranged by invitation) is that the allowable solutions (depending on the cost of carbon) with the Energy efficiency measures will form future policy and regulations.

District heating systems have inherent issues of accountability. This is fuelled by occupiers perceiving little control over their heating bills and the lack of choice (e.g. lock-in) for the supply of heat. Additionally, combined heat and power only becomes financially viable if the power can be utilised on site (private wire system) as current policy dictates that exporting to the grid is not economically viable.

Private wire systems lock users into one supplier and after a recent European court (Citiworks) case, the whole legality of private wire in the UK is now uncertain - this is subject to further DECC/CLG(?) consultation later this year. The proposed individual/local heating systems and individual utility supplies give occupants the freedom of choice.

With regard to Policy ENV 8, whilst we are pleased to see that measures will not be required if "not feasible or viable", but it is not clear that this statement has had regard to the overall costs of bringing sites to the market (including the costs of any necessary supporting infrastructure) and the need to avoid any adverse impact of development on the needs of the community etc. The definition of "feasibility" needs to be a broad one, and include technological viability as well as commercial drivers.

Summary:

These policies must be underpinned by viability testing. It should be stated that the level/extent of renewable energy or energy generation measures applicable to any development site will be assessed against an evidence-based understanding of local feasibility and viability and the potential for the delivery of sustainable technologies/measures on the particular site. When considering which measures are to be provided on a site, the cost implications of the infrastructure needs of that site will need to be considered in the round.

Change to Plan

The statement that "the use of biomass heating will not be supported...." should be deleted from paragraph 8.32. This section should accord with the flexible principles outlined in PPS1 and its supplement.

Other changes necessary to make the Core Strategy sound

It is strongly recommended that more detailed consideration is given to the requirements of Policies ENV6, ENV7 and ENV 8 before adopting such measures.

These policies must be underpinned by viability testing. It should be stated that the level/extent of renewable energy or energy generation measures applicable to any development site will be assessed against an evidence-based understanding of local feasibility and viability and the potential for the delivery of sustainable technologies/measures on the particular site. When considering which measures are to be provided on a site, the cost implications of the infrastructure needs of that site will need to be considered in the round.

Viability/feasibility work will be undertaken by the local authority to define appropriate targets and measures for each site, including strategic Greenfield sites.

It should be made clear that any requirements for sustainability/energy conservation and generation measures should be linked to the national policy applicable at the time (at the time of a planning application or any previous Design Brief or Master Plan, Concept Statement which sets the requirements for that particular site) and have regard to viability/feasibility work.

Appear at exam? Yes

Soundness Tests i, ii, iii

Core Strategy Submission Document

S - 16383 - 8267 - Policy ENV7 - Small Scale Renewable Energy Projects - None

16383 Support

CHAPTER 8 Policy ENV7 - Small Scale Renewable Energy Projects

Respondent: Aber Ltd [8267]

Aber Ltd
C/o Agent

Agent: Colliers CRE (Mr S Chapman) [8266]

Colliers CRE
9 Marylebone Lane
London
W1U 1HL
020 7344 6533

Full Text: Future developments should be designed to include (where appropriate) small scale renewable energy projects, as this will contribute to a more sustainable form of development.

Summary: Future developments should be designed to include (where appropriate) small scale renewable energy projects, as this will contribute to a more sustainable form of development.

Change to Plan N/A

Appear at exam? No

Soundness Tests N/A

Core Strategy Submission Document

S - 15990 - 13441 - Policy ENV8 - On-Site Renewable and Low Carbon Energy Generation - None

15990 Support

CHAPTER 8 Policy ENV8 - On-Site Renewable and Low Carbon Energy Generation

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: Definitions of feasibility and viability are unclear

Summary: Definitions of feasibility and viability are unclear

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16227 - 8650 - Policy ENV8 - On-Site Renewable and Low Carbon Energy Generation - i, ii, iii

16227 Object

CHAPTER 8 Policy ENV8 - On-Site Renewable and Low Carbon Energy Generation

Respondent: Countryside Properties (Southern) Ltd (Mr Steve Price) [8650] **Agent:** N/A

Countryside Properties (Southern) Ltd
Countryside House
The Drive
Brentwood
Essex
CM13 3AT
01277260000

Full Text: Representations relate to Policies ENV 6, 7 & 8

The requirements of these policies are generally, in principle, reasonable.

However we have several points of concern/issues.

1. Regarding the statement in paragraph 8.32 that "the use of biomass heating will not be supported..." A policy (or in this case a supporting statement to the policy) should not be prescriptive with regard to technologies. Technology and product innovation is advancing so quickly that this reference is not applicable with the majority of products on the market.

Furthermore, Building Regulations Parts F and L recently consulted on, and Part J now subject to consultation do not discriminate against such systems. According, flexibility in approaches should be upheld and specific quality metrics applied through Building Regulations and the CSH, and not planning policy. This will ensure that the most sustainable technologies are employed, by way of example 'Pyrolysis' would not be allowed, with the Core Strategy in its current form. There are no detrimental affects with regard to air quality when running such plant. Indeed, this plant runs on municipal waste, rubber tyres etc and biofuels.

Changes necessary to make the Core Strategy sound

The statement that "the use of biomass heating will not be supported..." should be deleted from paragraph 8.32. This section should accord with the flexible principles outlined in PPS1 and its supplement.

2. Given the current consultation of the Definition of Zero Carbon Homes, it is particularly difficult to comment on the proposals outlined. Indeed, CSH must also be revised to align with the regulatory definition of a zero carbon, as will the recent consultation documents for SAP, Part F and L of Building Regulations and the current Part J consultation.

We agree with principles of the Governments 'Energy Hierarchy' as far the energy efficiency measures are concerned, but we do not believe the incorporation of on-site renewable energy equipment to reduce predicted CO2 emissions by at least 10% above and beyond Building Regulations requirement, or indeed a district energy solution is most satisfactory manner to reduce emissions.

This view is substantiated by UK-GBC (in its 'Definition of Zero Carbon Report' May 2008), the First London Report 'Cutting the Capital's Carbon Footprint - Delivering Decentralised Energy' and much ongoing research. For example, we are currently working with the UK-GBC and the Zero Carbon Hub 'District Sustainable Infrastructure - Task Group' and will be reporting our findings to Ministers in late November 2009. Whilst, we cannot share the details of the draft reports, it can be stated that flexibility in the planning of developments must be maintained.

The principle of decreasing CO2 emissions by targeting reductions through energy efficiency measures is favoured by the CLG (as described in the December 2008 Zero Carbon consultation document).

Decreasing the operational carbon emissions of the site by reducing the heat demands of each dwelling has the benefit of reduced fuel bills for the occupiers. This will also improve the rating of the Energy Efficiency index on each Energy Performance Certificate (EPC), making these dwellings more appealing to potential residents, and attracting residents concerned with energy conservation.

Schemes which utilise CHP and renewable energy generated heat, such as biomass, whilst decreasing CO2 emissions by offsetting inefficient electricity production and burning 'green' fuel will actually increase the fuel bills for the residents.

Reducing the fundamental base heat demands is the only fail-safe way of keeping the heating costs down in the dwellings. This is imperative for the affordability of all dwellings, as it safeguards against fuel poverty in a volatile fuel market. Furthermore, renewable energy and CHP installations are cost intensive and they often diminish funds that could otherwise go towards fabric enhancement.

CHP and renewables, whilst technically reducing CO2 emissions, do nothing to decrease the energy demands of a dwelling, and often actually conceal a less efficient building.

Core Strategy Submission Document

O - 16227 - 8650 - Policy ENV8 - On-Site Renewable and Low Carbon Energy Generation - i, ii, iii

16227 Object

CHAPTER 8 Policy ENV8 - On-Site Renewable and Low Carbon Energy Generation

Furthermore the extensive below ground heating pipework network required on most sites is more prone to heat loss and leakage. The installation of private heating pipework within adoptable roads creates issues of responsibility which are still not fully resolved within the UK.

District heating maybe more suited to high/super density developments that have a balanced load profile (a mix of uses). Although, as proven by the UK-GBC, in its 'Definition of Zero Carbon Report' May 2008, some 80% of schemes would not be deliverable. Subsequently, CLG has consulting on the 1. Energy efficiency 2. Carbon compliance and; Allowable solutions approach - to date no definitive policy has been announced.

Whilst, it is not possible to guess the outcome of the many consultations, our (and our) peer group view (shared with CLG, DBERR and DEFRA, DECC and Treasury through meetings arranged by invitation) is that the allowable solutions (depending on the cost of carbon) with the Energy efficiency measures will form future policy and regulations.

District heating systems have inherent issues of accountability. This is fuelled by occupiers perceiving little control over their heating bills and the lack of choice (e.g. lock-in) for the supply of heat. Additionally, combined heat and power only becomes financially viable if the power can be utilised on site (private wire system) as current policy dictates that exporting to the grid is not economically viable.

Private wire systems lock users into one supplier and after a recent European court (Citiworks) case, the whole legality of private wire in the UK is now uncertain - this is subject to further DECC/CLG(?) consultation later this year. The proposed individual/local heating systems and individual utility supplies give occupants the freedom of choice.

With regard to Policy ENV 8, whilst we are pleased to see that measures will not be required if "not feasible or viable", but it is not clear that this statement has had regard to the overall costs of bringing sites to the market (including the costs of any necessary supporting infrastructure) and the need to avoid any adverse impact of development on the needs of the community etc. The definition of "feasibility" needs to be a broad one, and include technological viability as well as commercial drivers.

Summary:

These policies must be underpinned by viability testing. It should be stated that the level/extent of renewable energy or energy generation measures applicable to any development site will be assessed against an evidence-based understanding of local feasibility and viability and the potential for the delivery of sustainable technologies/measures on the particular site. When considering which measures are to be provided on a site, the cost implications of the infrastructure needs of that site will need to be considered in the round.

Change to Plan

Changes necessary to make the Core Strategy sound:

It is strongly recommended that more detailed consideration is given to the requirements of Policies ENV6, ENV7 and ENV 8 before adopting such measures.

These policies must be underpinned by viability testing. It should be stated that the level/extent of renewable energy or energy generation measures applicable to any development site will be assessed against an evidence-based understanding of local feasibility and viability and the potential for the delivery of sustainable technologies/measures on the particular site. When considering which measures are to be provided on a site, the cost implications of the infrastructure needs of that site will need to be considered in the round.

Viability/feasibility work will be undertaken by the local authority to define appropriate targets and measures for each site, including strategic Greenfield sites.

It should be made clear that any requirements for sustainability/energy conservation and generation measures should be linked to the national policy applicable at the time (at the time of a planning application or any previous Design Brief or Master Plan, Concept Statement which sets the requirements for that particular site) and have regard to viability/feasibility work.

The statement that "the use of biomass heating will not be supported...." should be deleted from paragraph 8.32. This section should accord with the flexible principles outlined in PPS1 and its supplement.

Appear at exam? Yes

Soundness Tests i, ii, iii

Core Strategy Submission Document

S - 16384 - 8267 - Policy ENV8 - On-Site Renewable and Low Carbon Energy Generation - None

16384 Support

CHAPTER 8 Policy ENV8 - On-Site Renewable and Low Carbon Energy Generation

Respondent: Aber Ltd [8267]

Aber Ltd
C/o Agent

Agent: Colliers CRE (Mr S Chapman) [8266]

Colliers CRE
9 Marylebone Lane
London
W1U 1HL
020 7344 6533

Full Text: Combined with the use of large and/or small scale renewable energy projects, this will assist in reducing carbon dioxide emissions from new residential developments.

Summary: Combined with the use of large and/or small scale renewable energy projects, this will assist in reducing carbon dioxide emissions from new residential developments.

Change to Plan N/A

Appear at exam? No

Soundness Tests N/A

Core Strategy Submission Document

O - 16617 - 5219 - Policy ENV8 - On-Site Renewable and Low Carbon Energy Generation - i, ii

16617 Object

CHAPTER 8 Policy ENV8 - On-Site Renewable and Low Carbon Energy Generation

Respondent: Fairview New Homes Ltd [5219]

Fairview New Homes Ltd
50 Lancaster Road
Enfield
Middlesex
EN2 0BY
020 83661271

Agent: Planning Potential (Miss G Brickwood) [7549]

Planning Potential
Palace House
3 Cathedral Street
London
SE1 9DE
0207 357 8000

Full Text: Representations on behalf of Fairview New Homes

1. We are instructed by our client, Fairview New Homes, to submit comments on the published Core Strategy Submission Document. For ease specific reference has been made in accordance with the paragraph and policy numbers as contained in the published document. We would like the opportunity to represent our Client at the forthcoming Examination of the Core Strategy DPD and would be grateful for confirmation that this is possible.

2. Fairview New Homes have an interest in a parcel of land to the South West of Rayleigh Town Centre, as indicated on the attached site location plan. This land was previously identified in the Core Strategy Preferred Options documents to provide an urban extension to the south west of Rayleigh. This option has now been withdrawn in the Core Strategy Submission document and it is on this basis these representations are provided to the Council.

3. The Submission Core Strategy has been considered against the requirements set out at Paragraph 4.36 of PPS12 requiring core strategies to be justifiable and effective in order to be found sound, as follows:

Justified:

- i. Founded on a robust and credible evidence base
- ii. The most appropriate strategy when considered against the reasonable alternatives

Effective:

- i. Deliverable - the Core Strategy should show how the vision, objectives and strategy for the area will be delivered and by whom, and when, including who is responsible for implementing different elements of the strategy and when
- ii. Flexible - a strategy is unlikely to be effective if it cannot deal with changing circumstances. Plans should show how they will handle contingencies.
- iii. Able to be monitored - monitoring is essential for an effective strategy and will provide the basis on which the contingency plans within the strategy would be triggered.

4. To summarise our comments, Fairview New Homes strongly object to the Core Strategy as is currently presented on the basis the document is currently unsound for a number of reasons:

â€¢ The lack of robust and credible evidence base

â€¢ Failure to clearly discount reasonable alternatives

â€¢ The effectiveness of the plan is also considered to be flawed and the Council's approach to deliverability and flexibility is questioned.

5. Fundamentally, we question the soundness of the Core Strategy due to the lack of available evidence to support the choices made by the Council. In particular, there is a strong reliance on the findings of the 2009 Strategic Housing Land Availability Assessment (SHLAA) although it is understood this document is not due to be published for consideration alongside the Core Strategy. We, therefore, reserve the right to submit additional comments to the Core Strategy consultation following the publication of the SHLAA.

6. The 2009 SHLAA is clearly listed at Paragraph 1.29 of the submission Core Strategy as one of the evidence base documents the Council have drawn upon when drafting the Core Strategy. The documents listed are all considered to have played an important role in informing the Core Strategy. PPS12 also recognises at Paragraph 4.37 the importance of demonstrating how choices made in the plan are backed up by factual evidence identified in evidence base documents.

7. As a starting point it is important to state it is Fairview New Homes greatest concern there is no background provided within the Core Strategy document, or indeed any of the available evidence base documents, identifying why the Local Planning Authority has chosen to remove some of the sites previously proposed for housing development. In addition, there is also no justification as to why the retained urban extension sites are more suitable than those removed from the draft plan.

8. The following provides specific comments in response to the relevant areas of the Core Strategy.

Housing

9. It is stated at Paragraphs 4.10-4.12 that the Council have adopted a balanced approach when locating new housing between higher tier settlements and lower tier settlements. Although there is no detail provided as to how the Council

Core Strategy Submission Document

16617 Object

CHAPTER 8 Policy ENV8 - On-Site Renewable and Low Carbon Energy Generation

intend on implementing this balanced approach or how the strategic allocation of housing contributes to the balance required. Our Client cannot support this approach until further detail is understood as to the proportion of housing being allocated to each settlement tier.

10. The proposed distribution of housing development during the plan period does not appear to be proportionately allocated between the various settlement tiers. We would argue that development should be distributed proportionately in line with the size of the settlement in order to benefit for available services and facilities. Rayleigh recognised as having best access to services within the district at Paragraph 2.68 of the Core Strategy. On this basis it is considered the development should primarily be directed to Rayleigh with a proportionate level of housing to the remaining settlements in the District.

Policy H1 - The efficient use of land for housing

11. In general the use of residential extensions to meet the remaining housing requirement that cannot be delivered through the redevelopment of appropriate previously developed land is supported by Fairview New Homes.

12. It is understood there is a need to prioritise use of brownfield land in line with national policy requirements but this needs to be a carefully balanced and realistic approach in identifying appropriate urban extensions to accommodate the majority of the District's housing, as identified in the table at Paragraph 4.6 and later at Paragraph 4.15.

13. Policy H1 sets out that the Council will seek the redevelopment of Rawreth Lane Industrial Estate, Foundry Industrial Estate, Stambridge Mills and Star Lane Industrial Estate. Without sight of the 2009 SHLAA it is not possible to understand whether the Council's choice to release employment land for housing is appropriate and Fairview New Homes cannot, therefore, support this element of Policy H1. This objection is further amplified by the fact additional employment land is required but is yet to be identified.

Policy H2 - Extensions to residential envelopes and phasing

14. The Council's intention to provide a balanced strategy for housing provision is mentioned again at Paragraph 4.18. The comments made at Paragraphs 9 and 10 above are also relevant in this respect.

15. In comparing the Preferred Options Core Strategy Document and Submission Core Strategy Document there is a significant reduction in the number of housing units being provided in urban extensions pre 2015, from 1450 dwellings to 775. From discussions with the Local Planning Authority it is understood the Council are seeking to provide the District's housing requirements by increased development densities. From the evidence available in the Submission Core Strategy and summary of SHLAA sites a number of the sites identified as urban extensions have in fact been allocated a reduced number of dwellings, including the land to the north of London Road, Rayleigh. We would, therefore, consider the approach taken by the Local Planning Authority to provide the required level of housing is untenable and unjustified.

16. In discounting preferred options PPS12 makes clear at Paragraph 4.38 the requirement for Local Planning Authorities to consider and evaluate reasonable alternatives. As set out above, the choices the Council have pursued have not been substantiated and without the consideration of reasonable alternatives the Core Strategy cannot be considered justified and therefore unsound.

17. However, this is our opinion based only on discussions with the Local Planning Authority rather than a thorough evidence base and we will consider the evidence in detail when it become available and provide further comment.

18. Paragraph 4.19 of the draft Core Strategy details the Council's primary factors in determining the location of future urban extensions. It is presumed the Council have assessed each of the proposed urban extension sites against the following criteria and that this information is contained within the SHLAA, although we have not been provided with any evidence of this to assess. It can be demonstrated that the land identified on the attached site location plan meets all of the requirements set out below.

â€¢ The proximity and relationship to existing centres, facilities, services

â€¢ The availability of infrastructure and/or the potential for additional infrastructure to be provided for development in such areas

â€¢ The potential to reduce private car dependency

â€¢ The potential to avoid areas of constraint (such as areas at risk of flooding, sites of ecological importance, public safety zone etc)

â€¢ The historical, agricultural and ecological value of land

â€¢ The impact on highway network (including availability and impact on existing network, as well as potential for improvements to be delivered)

â€¢ The relationship of development locations to the District's area of employment growth

â€¢ The potential to create a defensible Green Belt boundary

â€¢ The avoidance of coalescence with neighbouring settlements

19. In summary, Fairview's land is sustainably located in particularly close proximity to Rayleigh Town Centre and train station. In addition, the location of the land provides a natural extension and rounding of settlement boundary. An extension to Rayleigh in this location offers no opportunity for coalescence with neighbouring settlements nor does it constitute urban sprawl.

Core Strategy Submission Document

16617 Object

CHAPTER 8 Policy ENV8 - On-Site Renewable and Low Carbon Energy Generation

Policy H2 - Extensions to residential envelopes and phasing

20. Although it is stated a flexible approach to the timings of the release of land will be maintain no explanation is provided as to why some sites are considered suitable for development pre 2015 and others post 2015. Paragraph 4.22 elaborates further to state a number of factors have been considered when determining the phasing of strategic housing sites although this information is not clearly available to assess.

21. As stated above the principle of releasing certain areas of greenbelt land is considered the best approach to meeting the Council's housing provision requirements. However, Fairview New Homes object to the omission of the land to the South West of Rayleigh for housing development as previously identified in the Core Strategy Preferred Options document. The site identified on the attached site location plan has been assessed against the Council's criteria, as set out at Paragraph 18 above and each requirement can be met. Without any clear explanation as to why this site has been discounted and the only other strategic housing site identified in Rayleigh is located further away from Rayleigh Town Centre and the associated services and facilities including the train station, Fairview New Homes object to Policy H2.

22. As considered at the outset of these representations the draft Core Strategy cannot be considered robust, and therefore sound, without clear justification and evidence base.

Policy H3 - Extension to residential envelopes post-2021

23. Policy H3 is supported on the basis that the release of greenbelt land is required for housing and this is the most appropriate approach to meet the Council's housing requirements, as set out at Paragraph 21 above.

24. However, it is unclear why some of the sites previously identified for housing development pre 2015 up until 2021 in the Preferred Options Core Strategy document have now been allocated for development post 2021, such as South East Ashingdon. It is stated at Paragraph 4.24 of the Submission Core Strategy document those areas identified for post 2021 development may not be immediately deliverable. However, there is no information available to understand why these sites are now no longer considered suitable for pre 2015 development as they were in December 2008. As a result, Fairview New Homes consider Policy H3 to be unjustified and therefore unsound.

Affordable Housing

25. The acute need for additional affordable housing is recognised at Paragraph 4.30. It is unclear from the draft Core Strategy document exactly how much affordable housing is required in the District in the plan period.

26. However, taking the starting point as set out at Paragraph 4.30 that the Thames Gateway South Essex Strategic Housing Market Assessment requires 131 net additional affordable dwellings per year which constitutes 52% of the District's overall annual housing target. In order to achieve this target using the Council's proposed policy requirement that new housing developments are to provide 35% affordable housing, 375 new dwellings would need to be developed each year. This calculation does not account for those developments with fewer than 15 dwellings which have no requirement to provide affordable housing or developments which cannot viably afford to provide non-market housing.

27. An annual requirement of 250 dwellings is identified at Paragraph 4.2 of the Core Strategy which would leave a significant short fall of affordable housing and act to compound the current situation. The approach taken by the Council ultimately accepts there will always be a shortfall in affordable housing provision and does not seek to redress this. We do not, therefore, consider this to be a robust or justified approach to achieving affordable housing in the District.

28. It is, therefore, considered in order to meet the District's affordable housing requirement additional housing land should be identified in order to ensure a wholesale increase in housing provision to address the Council's shortfall in affordable housing and meet the targets set for the plan period. The most appropriate and effective method by which to secure affordable housing provision is through developing large sites that are viably able to offer affordable housing units.

29. During the consultation of the submission Core Strategy the Council's Housing Strategy (2009) was not available and we reserve the right to make further comment on this document following the publication of this evidence.

The Green Belt

30. It is fully accepted by the Council that the Green Belt boundary is currently too tightly drawn and the release of some Green Belt land is necessary to meet the District's development requirements. However, it needs to be demonstrated that the areas of Green Belt land to be lost are justified and located in the most appropriate area and that areas of release land do not undermine the principle of the Green Belt.

31. It is understood from Paragraph 6.7 of the Submission Core Strategy the Council will seek to examine the degree to which current Green Belt land is helping to achieve the purposes of the Green Belt when considering reallocating land. However, areas of Green Belt are proposed to be reallocated for urban extensions prior to this research being undertaken.

Core Strategy Submission Document

O - 16617 - 5219 - Policy ENV8 - On-Site Renewable and Low Carbon Energy Generation - i, ii

16617 Object

CHAPTER 8 Policy ENV8 - On-Site Renewable and Low Carbon Energy Generation

32. Fairview New Homes fully support the justified retention of the areas of Green Belt where appropriate and the release of Green Belt land where needed. However, at present the proposed Housing policies and Green Belt policies are not coherent and the reallocation of certain areas of Green Belt is not based on a credible evidence base.

Environmental Issues

Policy ENV4 - Sustainable Drainage Systems (SUDS)

33. Fairview New Homes would like to support the flexibility contained within Policy ENV4 which recognises it is not always viably possible to incorporate SUDS in all developments.
Policy ENV8 - On Site Renewable and Low Carbon Energy Generation

34. We would also like to support Policy ENV8 on the same basis as Policy ENV4 in that it is important that the production of energy from renewable or low carbon sources is only required where it is viably possible so as not to resulting in developments not coming forward.

Transport

Policy T8 - Parking Standards

35. Fairview New Homes object to Policy T8 as it is currently contrary to National Policy requirements as set out in PPG13 which contains maximum parking standards. Indeed, this is recognised at Paragraph 10.27 of the Submission Core Strategy document. Enforcing minimum parking standards is not consistent with local or national sustainability aims and should not be an approach pursued by the Council.

Summary: Policy ENV8 - On Site Renewable and Low Carbon Energy Generation

34. We would also like to support Policy ENV8 on the same basis as Policy ENV4 in that it is important that the production of energy from renewable or low carbon sources is only required where it is viably possible so as not to resulting in developments not coming forward.

Change to Plan

Appear at exam? Yes **Soundness Tests** i, ii

Core Strategy Submission Document

S - 16662 - 8069 - Policy ENV8 - On-Site Renewable and Low Carbon Energy Generation - None

16662 Support

CHAPTER 8 Policy ENV8 - On-Site Renewable and Low Carbon Energy Generation

Respondent: A W Squier LTD and the Croll Group [8069]

A W Squier LTD and the Croll Group
Doggetts
Rochford

SS4 3RN

Agent: Andrew Martin Associates Ltd (Mr R Pomery) [7786]

Andrew Martin Associates Ltd
Croxtan's Mill
Little Waltham
Chelmsford
Essex

CM3 3PJ

01245 361611

Full Text: The Respondents support policy ENV8 On-Site Renewable and Low Carbon Energy Generation. It is hoped that the Respondents' land in East Ashingdon, which is identified as a broad location for development in the CS will incorporate at least 10% of its energy from a renewable source.

Masterplan/Facilities plan Council ref AE22

Summary: The Respondents support policy ENV8 On-Site Renewable and Low Carbon Energy Generation. It is hoped that the Respondents' land in East Ashingdon, which is identified as a broad location for development in the CS will incorporate at least 10% of its energy from a renewable source.

Masterplan/Facilities plan Council ref AE22

Change to Plan N/A

Appear at exam? Not Specified

Soundness Tests N/A

Core Strategy Submission Document

S - 16883 - 8329 - Policy ENV8 - On-Site Renewable and Low Carbon Energy Generation - None

16883 Support

CHAPTER 8 Policy ENV8 - On-Site Renewable and Low Carbon Energy Generation

Respondent: Swan Hill Homes Limited [8329]

Swan Hill Homes Limited
C/O Agent
Mr P Kneen
Charles Planning

Agent: Charles Planning Associates Ltd (Mr P Kneen) [5040]

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PO15 7AH
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Full Text:

1.0 Instruction and Introduction

1.1 Charles Planning Associates Limited (Chartered Town Planners) is Instructed by Swan Hill Homes Limited (Swan Hill) to prepare and submit representations on their behalf in respect of the Rochford District Local Development Framework: Core Strategy Submission (September 2009) Development Plan Document.

1.2 The comments refer to the relevant sections and policy designations in the Submission document, as appropriate.

1.3 The comments set out in this submission are intended to assist the District Council in taking forward its Local Development Framework. It is our intention to continue to be involved in the LDF preparation process and we look forward to the opportunity to comment further at the Examination to the Core Strategy.

1.4 If you have any queries regarding the content of this submission then please do not hesitate to contact:

Peter Kneen BSc (Hons) MSc MRTPI
Planner

2.0 Housing:
Policy H1 - The Efficient Use of Land for Housing

2.1 Swan Hill recognises the importance of seeking to concentrate new developments mainly in the existing urban areas, on previously developed land where possible, particularly in view of the Government seeking to ensure 60% of all such new developments are on previously development land (PDL).

2.2 However, given the character of the District, and the strategic housing requirement of the East of England Plan, Swan Hill supports the approach that the Council must also make provision for additional development on the edge of existing settlements on greenfield sites, particularly in the most sustainable locations. As such, Swan Hill supports that where feasible, the redevelopment of existing employment sites for residential/employment purposes can make a contribution towards the strategic housing requirement, provided that sufficient additional employment land is brought forward to ensure the stability of employment levels in the District, and to ensure employment growth meets the East of England Plan requirements.

2.3 Swan Hill considers that Policy H1 should include consideration that new extensions to existing settlements have regard to their potential impact on the wider characteristics and openness objectives of the Green Belt.

Policy H2 - Extensions to Residential Envelopes and Phasing

2.4 Swan Hill generally supports the approach taken by the Council in this policy. As set out above, Swan Hill consider the Council's acknowledgment that housing requirements should be met through the allocation of land on the edge of the existing settlements is the most suitable way forward to meeting the Council's strategic housing requirement and complies with the advice in PPS3.

2.5 The need for suitable greenfield urban extensions represents the best way forward for the Council to meet its strategic housing requirement, as set out in the East of England Plan. Swan Hill supports the recognition that the potential supply of alternative previously developed sites is limited, without detrimentally affecting the character of the District, and therefore the best way forward is the use of sustainable greenfield urban extensions to the existing settlements of the District.

2.6 However, Swan Hill consider that a fundamental consideration that the District Council should consider relates to the potential impact of the urban extensions on the Green Belt policy has been somewhat overlooked. The wider sustainability credentials of the settlements of the District should only be one of many key considerations for determining the level of expansion. In view of the proximity of Southend-on-Sea to all the main settlements of the District, and the influence this has on the likely location many people would travel for employment and leisure, sustainability of many of the settlements is not a key overarching factor, and greater weight should be placed on the potential impact on the openness of the Green Belt, as this cannot be remedied if development occurs in the wrong location.

2.7 As such, Swan Hill considers that determining the location of growth for the main settlements should be to identify

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S - 16883 - 8329 - Policy ENV8 - On-Site Renewable and Low Carbon Energy Generation - None

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those locations where the impact on the wider setting of the Green Belt can be minimised. Further justification for those general locations chosen should be identified in Policy H2. In this regard, Swan Hill has serious concerns regarding the removal of Land South West of Great Wakering as a viable option for the growth of the settlement. The development of this area of Great Wakering, in addition to the potential redevelopment of the Star Lane Industrial Estate could provide a more comprehensive development, whilst ensuring that the wider openness of the Green Belt is maintained. Land South West of Great Wakering is significantly better placed to limit the impact on the wider Green Belt than Land West of Great Wakering, and could contribute to the provision of an important amenity and wildlife site for the local community.

2.8 In addition, Swan Hill consider that the Council now has no reserve provision in the event that any of the existing employment sites set out in Policy H1 fail to come forward for development within the envisaged timescale. Further, Land West of Great Wakering has not been identified in the SHLAA as a deliverable site to help meet the strategic housing requirement, contrary to the requirement set out in PPS3.

2.9 As such, Swan Hill would support the provision of suitable sites which could be safeguarded for future development in the likelihood of a shortfall in supply.

Policy H3 - Extensions to Residential Envelopes Post 2021

2.10 As set out above, Swan Hill supports the overall approach the Council has taken towards the provision of sustainable urban extensions as a suitable means of meeting their strategic housing requirement. However, as set out for Policy H2 above, Swan Hill has serious concerns regarding the removal of several proposed sites set out in the October 2008 Preferred Options Core Strategy, without any guarantee of the ability to deliver those sites set out in Policy H1.

2.11 As also considered above, the inclusion of West of Great Wakering for 250 dwellings should not be included ahead of South West of Great Wakering, in view of the fact that the site is not identified in the SHLAA as available, suitable and achievable as required by PPS3, and thus is not supported by a robust and creditable evidence base for its inclusion as a strategic site for development.

2.12 Whilst Swan Hill acknowledge that alterations to Policy H1 has resulted in the removal of some locations for growth in Policy H3 (as set out in the Sustainability Appraisal), Swan Hill does not consider that the most appropriate locations have been chosen.

2.13 In addition to the matters raised above, the use of West of Great Wakering would also result in the loss of valuable agricultural land, which clearly in a Green Belt location, should be less suitable for development than other sites, such as South West of Great Wakering, which would have limited impact on the wider Green Belt policy, and not result in the loss of valuable agricultural land.

2.14 Finally, in respect of Policies H1, H2 and H3, all of the above comments are based on our interpretation of the Submission Version Core Strategy when compared to the October 2008 Version of the Core Strategy. Without the ability to undertake a detailed assessment of the Council's SHLAA, it is not possible to clarify the proposed Core Strategy position regarding the proposed direction of growth proposed for the settlements in the District. As such, Swan Hill reserves the right to make additional representations regarding the proposed Policies H1, H2 and H3 following the publication of the SHLAA in due course.

Policy H4 - Affordable Housing

2.15 In general terms, Swan Hill supports the approach taken by the Council towards the provision of affordable housing for new residential developments. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H5 - Dwelling Types

2.16 Swan Hill supports the policy provision of H5, and considers that the approach taken by the Council for this policy represents a suitably flexible alternative to stipulating percentages of dwelling mix, sought by some local authorities. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H6 - Lifetime Homes

2.17 In regard to this policy, Swan Hill objects to the Council's policy where all new dwellings should be provided to the Lifetime Homes Standard. Whilst it is acknowledged that the UK has an aging population, Swan Hill considers that seeking to provide Lifetime Homes on all sites is considered to be overly onerous for proposed developers, particularly when considering the requirement for all car parking spaces to be suitable for disabled users, which could result in more schemes becoming unviable. Therefore, the provision of a percentage of Lifetime Homes should be considered through negotiations with the Council at the planning application stage, and should be determined on a case-by-case basis.

3.0 Character of Place: Policy CP1 - Design

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3.1 The Town and Country Planning (General Development Procedure) Order 1995 (As Amended) makes the submission of a Design and Access Statement for most types of planning applications a Statutory requirement, and as such, the provision of a Design Brief represents a pre-requisite of all major planning applications.

3.2 Policy CP1 seeks to ensure the provision of good, high quality developments that reflect local characteristics and distinctiveness, this ideology is supported by Swan Hill.

4.0 The Green Belt:
Policy GB1 - Green Belt Protection

4.1 Following the amendments to the wording of the Policy since the October 2008 Preferred Options Core Strategy, Swan Hill is now generally supportive of Policy GB1 and its supporting text. However, as expressed above, it is important that where alterations to the Green Belt boundary occur as a result of the extension of the settlements to meet the strategic housing requirement, both the minimal amount of land is taken and where that land is taken for development, it represents the best available land which has a minimal impact of the wider openness characteristic of the Green Belt.

5.0 Environmental Issues:
Policy ENV3 - Flood Risk

5.1 Swan Hill generally supports the approach set out in Policy ENV3 regarding ensuring development accords with the sequential test of PPS25. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV4 - Sustainable Drainage Systems (SUDS)

5.2 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV4. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV8 - On-site Renewable and Low Carbon Energy Generation

5.3 Whilst Swan Hill recognises the importance of reducing carbon emissions, particularly in new housing developments, and the role this can play in reducing the nations overall Greenhouse emissions. As such Swan Hill is generally supportive of Policy ENV8. It is noted that Policy ENG1 of the East of England Plan sets out a threshold of developments comprising 10 or more dwellings. Swan Hill consider it important for the District Council to justify the reduction in the threshold level.

5.4 Further, no assessment of Policy ENV8 has been set out in the Sustainability Appraisal which justifies the change in threshold from that of Policy ENG1 of the RSS.

Policy ENV9 - Code for Sustainable Homes

5.5 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV9. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

6.0 Community Infrastructure, Leisure and Tourism:
Policy CLT1 - Planning Obligations and Standard Charges

6.1 Swan Hill generally supports the overall approach the Council has taken in Policy CLT1. It is considered Policy CLT1 sets out a degree of flexibility to ensure that all sites are considered on a site-by-site basis, assessing the individual merits of each planning application, in order to ensure the levels of contributions applicable meet the five tests of Circular 05/05. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policies CLT5 - Open Space;
CLT7 - Play Space;
CLT8 - Youth Facilities; and,
CLT10 - Playing Pitches

6.2 Swan Hill supports the need for new residential developments to incorporate a degree of new publicly accessible open space, children's play space, youth facilities and playing pitches, and as such, generally supports the policy approaches taken by the Council.

6.3 However, it is important that whilst the Council may seek to undertake an assessment of providing standard charges for new development, which, as set out in Policy CLT1, this should be based on thorough public consultation and consideration and sound justification. Swan Hill consider that within the provision of a standard charge, it is important that such provision allows for a degree of flexibility to ensure that each site is assessed individually and on its own merits. This is particularly important for those sites close to existing open spaces and facilities. As such, the levels of

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open space and recreation facilities required in the 'standard charge' should be based on an up-to-date PPG17 Open Space assessment, which should be used to form a key consideration in the levels of provision likely to be required in the standard charge system proposed.

7.0 Transport: Policy T1 - Highways

7.1 Swan Hill supports the overall objectives set out in Policy T1 requiring developments to be located and designed to reduce the reliance on the private car and to meet the infrastructure needs generated by development or seek to help achieve these needs is acceptable in principle.

7.2 Swan Hill recognises the importance of providing sufficient infrastructure provision to meet the requirements of development, and that where developments have insufficient consideration of impact on existing infrastructure, they should be considered unacceptable and contrary to National policy guidance. However, Swan Hill considers it important to emphasise that the developer's role should not be seen as a means to meet existing shortfalls in provision.

Policy T3 - Public Transport

7.3 Swan Hill is generally supportive of the policy approach set out in T3, however, as set out in paragraph 7.2 above, it is important that the District Council do not consider that it is the developer's responsibility to resolve existing shortfalls in provision of public transport, and any contribution towards additional public transportation provision should only be to mitigate against the additional level of demand likely from the development proposed.

Policy T5 - Cycling and Walking

7.4 Swan Hill supports the general approach to this policy, as Swan Hill recognises the importance of promoting the use of alternatives to the private car. The policy provision acknowledges the need to ensure relevant contributions in the event of additional travel demands generated by individual developments, whilst also setting out additional aspirations for the cycle network in the District.

7.5 As such, Swan Hill considers this policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy T8 - Parking Standards

7.6 The Council has recently (January 2007) adopted SPD on the requirements for parking standards, and as such, Swan Hill generally supports the policy approach chosen by the Council. As set out in the SPD, whilst Swan Hill generally supports the approach taken by the District Council towards setting residential parking standards, in that the Council has recognised that in the suburban areas, even with some access to public transport, the majority of residents will rely on the use of private cars. However, Swan Hill has concerns over the failure of the District Council to comply with the provisions of PPG13: Transport (2001) which sets out that Local Planning Authorities should not set minimum standards for car parking. Whilst it is acknowledged that PPS3 sets out provision for the consideration of local circumstances, it is considered that the Council has not justified this deviation from PPG13's maximum standard.

7.7 Whilst it is acknowledged that such justification may become apparent through the work currently being undertaken by Essex County Council, until such time, the District Council should only seek to apply the maximum standards indicated in PPG13. However, Swan Hill recommends that the District Council make provisions in the wording of the Policy to allow for changes in the event that future policy on car parking standards need to reflect the County standard, following the completion of the County Council review.

8.0 Economic Development: Policies ED3 - Existing Employment Land ED4 - Future Employment Allocations

8.1 In respect of Policies ED3 and ED4, Swan Hill notes that they have changed considerably since the October 2008 Preferred Options document, in that they are site specific regarding the location of the proposed redevelopment of existing employment sites. These four sites are also identified in Policy H1 - Efficient Use of Land, and in general, Swan Hill supports the approach to the redevelopment of these sites (where feasible) based on the assessments of the sites set out in this version of the Core Strategy.

8.2 However, Swan Hill has concerns that these policies might not be considered suitably sound given that insufficient opportunity has been allocated for consultation on their redevelopment. Without the SHLAA being publically available prior to the consultation on this Core Strategy, an insufficient evidence base has been provided to corroborate that these sites are neither suitable or deliverable to meet the test of soundness requirements.

Summary: Policy ENV8 - On-site Renewable and Low Carbon Energy Generation

5.3 Whilst Swan Hill recognises the importance of reducing carbon emissions, particularly in new housing developments, and the role this can play in reducing the nations overall Greenhouse emissions. As such Swan Hill is

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S - 16883 - 8329 - Policy ENV8 - On-Site Renewable and Low Carbon Energy Generation - None

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generally supportive of Policy ENV8. It is noted that Policy ENG1 of the East of England Plan sets out sets out a threshold of developments comprising 10 or more dwellings. Swan Hill consider it important for the District Council to justify the reduction in the threshold level.

5.4 Further, no assessment of Policy ENV8 has been set out in the Sustainability Appraisal which justifies the change in threshold from that of Policy ENG1 of the RSS.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 15892 - 14113 - Policy ENV9 - Code for Sustainable Homes - None

15892 Support

CHAPTER 8 Policy ENV9 - Code for Sustainable Homes

Respondent: Sanctuary housing association (Miss Sarah Brind) **Agent:** N/A
[14113]

Sanctuary housing association
Collier House
Mead Lane
Hertford
SG13 7UZ
01992 513441

Full Text: We support the requirement to achieve Code 3 by 2010.

Summary: We support the requirement to achieve Code 3 by 2010.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16243 - 8650 - Policy ENV9 - Code for Sustainable Homes - i, ii, iii

16243 Object

CHAPTER 8 Policy ENV9 - Code for Sustainable Homes

Respondent: Countryside Properties (Southern) Ltd (Mr Steve Price) [8650] **Agent:** N/A

Countryside Properties (Southern) Ltd
Countryside House
The Drive
Brentwood
Essex
CM13 3AT
01277260000

Full Text: Representation relates to policies ENV 9 and 10

Careful consideration needs to be given to accelerating the Code for Sustainable Homes (CSH) and BREEAM standards in advance of adopted policy. CSH is not a mandatory requirement and only the energy criteria (i.e. 25%) will be become regulation through Building Regulations Part L from 2010 and further improvements at specified milestones thereafter.

In 'Building a Greener Future Policy' reference is made to building performance and local authorities would need to have regard to a number of considerations, including whether the proposed approach is consistent with securing the expected supply and pace of housing development shown in the housing trajectory required by Planning Policy Statement 3. Indeed, further consistent references are also referenced in PPS 1.

It goes on to state that national standards for reducing carbon emissions from homes should be set through building regulations, supported through the planning system. Indeed, given the level of ambition built into the national framework, CLG believe it would make it harder for industry to invest in supply chains with confidence or get the economies of scale to make new technologies cost effective. "It would also jeopardise our parallel commitment to increase the level of house building and deliver the affordable homes the country needs".

Given, these drivers it is considered that if levels for CSH and BREEAM are stipulated they are subject to review against national policy and importantly viability tests. Furthermore, the 'Core Strategy' would benefit from reflecting on the publication of the 'Definition of Zero Carbon Homes and Non-domestic Buildings' policy, and the soon to be published 2010 Code for Sustainable Homes consultation paper, and in addition the UK-GBC Consultation on a Code for Sustainable Buildings.

With regard to water conservation aspects, the setting of water standards through CSH is fraught with risks, for example the Approved Document G of the building regulations, 'Sanitation, Hot Water Safety and Water Efficiency' was published in May and was to take effect from October 2009; however this has now been put back to April 2010. The reason behind this is because under the Technical Standards Directive (98/34/EC), notification to the European Commission of the guidance contained in the draft Approved Document G was required.

Consequently on the 3rd September a "detailed opinion" was received from the Commission with a number of comments on the draft Approved Document. This resulted in a '3 month standstill' which prohibits introduction of the Approved Document before 2 December 2009. Accordingly, CLG have decided to delay its issue until 6 April 2010.

With regard to surface water run-off, category SUR1 of CSH is now subject to similar review by CLG Technical Advisory Group, because it has been found to be unreasonable in its intent and will result in significant technical problems and additional costs compared with current regulations.

Moreover, PPS 25 must be treated with caution as its interpretation is subject to variable outcomes at the sub-regionally level. For example, we support the principles of SuDs; however Highways Departments very often will not accept or adopt such measures

Summary: If levels for CSH and BREEAM are to be stipulated within the Core Strategy, wording must be inserted which states that levels/requirements are subject to review against national policy and, importantly, viability tests at the appropriate time.

Alternatively, no minimum target should be set within the Core strategy, but words be inserted which state that the minimum levels/requirements will be set for an individual developments when the detailed scale and nature of a development scheme is known or defined (e.g. within a Design Brief or Master Plan, Concept Statement or Planning Application for a site).

Change to Plan If levels for CSH and BREEAM are to be stipulated within the Core Strategy, wording must be inserted which states that levels/requirements are subject to review against national policy and, importantly, viability tests at the appropriate time.

Alternatively, no minimum target should be set, but words be inserted which state that the minimum levels/requirements will be set for an individual developments when the detailed scale and nature of a development scheme is known or defined (e.g. within a Design Brief or Master Plan, Concept Statement or Planning Application for a site) and will be set in accordance with national building regulations or other national policy at the time unless viability tests indicate that such levels/requirements would not be appropriate/would make a scheme unviable.

Core Strategy Submission Document

O - 16243 - 8650 - Policy ENV9 - Code for Sustainable Homes - i, ii, iii

16243 Object

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Appear at exam? Yes

Soundness Tests i, ii, iii

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

Core Strategy Submission Document

O - 16256 - 9177 - Policy ENV9 - Code for Sustainable Homes - i

16256 Object

CHAPTER 8 Policy ENV9 - Code for Sustainable Homes

Respondent: Colonnade Land LLP [9177]

Colonnade Land LLP
Fifth Floor
17-19 Maddox Street
London
W15 2QH
020 7255 7490

Agent: Icen Projects Limited (David Churchill) [10057]

Icen Projects Limited
83 Victoria Street
London
SJ1H 0HW

Full Text: ROCHFORD DISTRICT COUNCIL - LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY SUBMISSION
SEPTEMBER 2009

Icen Projects Ltd (Icen) has been instructed by Colonnade Land LLP (Colonnade) to submit representations to the Rochford Local Development Framework Core Strategy Submission (CSS).

a) Overview

It is our conclusion that the CSS is not justified, effective or consistent with national policy, as required by Planning Policy Statement 12: Creating Strong Safe and Prosperous Communities through Local Spatial Planning (PPS12) and is therefore vulnerable to being found unsound by an Inspector through the Examination in Public.

b) Background and Summary

These representations follow those made by Icen on behalf of Colonnade to the Preferred Options Core Strategy, submitted via letter dated 17 December 2008. In this regard, we would request that the Council confirms that the representations made to the Preferred Options Core Strategy will be taken into account alongside the current representations, particularly as there are a number of cross references between the two sets of representations.

It is not considered necessary to reiterate the content of the previous representations, as they were made at the appropriate stage and will be considered by the Planning Inspectorate in due course, but it is inevitable that certain elements will require restating where it is not clear that they have been taken into account in the production of the CSS. For clarity, therefore, Colonnade feel that it is appropriate to clarify the 'in-principle' issues that were raised in the representations to the Preferred Options Core Strategy, recognising that these issues were raised in the context of a wider and more coherent justification made within the representations:

- â€¢ Further cross-referencing of the recommendations made within the evidence base is required;
- â€¢ Greater focus should be placed on promoting Rochford as the principal settlement within the District;
- â€¢ Coombes Farm is the most logical location for residential development abutting the urban area of Rochford and as such warrants recognition as a general location for residential development;
- â€¢ The allocation of Three Ashes Farm for employment generating uses will be pursued;
- â€¢ Recognition that it is not realistic to expect residential allocations to be met mainly on Brownfield sites, nor should the intensification of smaller sites in residential areas be pursued;
- â€¢ Many of the sites identified as suitable for residential development will not be viable and will not come forward for development within the timescales anticipated;
- â€¢ The failure to provide the necessary justification for the proposed infrastructure improvements sought in Appendix H1;
- â€¢ The inclusion of an affordable housing exception policy was sought; and
- â€¢ The need to identify sites capable of delivering employment growth in the short term.

Following assessment of the CSS presented by the Council for consultation prior to submission to the Secretary of State, Colonnade considers the Plan to be 'unsound' as the document consistently fails to meet the tests of soundness set out in the table following Paragraph 4.52 of PPS12. For clarity, PPS12 confirms that to be 'sound' a Core Strategy should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY and defines 'justified' as "founded on a robust and credible evidence base" and "the most appropriate strategy when considered against the reasonable alternatives" and 'effective' as "deliverable", "flexible" and "able to be monitored".

The rationale for the above is identified in the remainder of these representations, which are provided in the interests of ensuring the Council delivers a strong, robust and logical Core Strategy that guides the future development of the District in a justified and effective manner.

b) Colonnade

As the Council is aware from previous submissions to the Local Development Framework, Colonnade is a strategic land company with a particular interest in the future development of the District as a consequence of a number of sites that it controls, particularly around Rochford.

The Council will also be aware that Colonnade has recently submitted an outline planning application for the residential development of the land at Coombes Farm, Rochford to provide a sustainable urban extension comprising up to 326

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residential dwellings, with associated accesses and community uses. Whilst the planning application process is clearly separate from the Local Development Framework production process, Colonnade wishes to continue the promotion of the site as a suitable location for residential development.

Accordingly, these representations focus on the legal requirements and tests of soundness associated principally with the Housing and Employment chapters of the CSS, with reference where appropriate to the sites that are controlled by Colonnade, the outline planning application at Coombes Farm and other issues where relevant.

c) Housing

i. Date of Adoption

The CSS assumes an adoption date of 2010 and plans for the provision of housing to 2025.

Taking account of the potential delays to the adoption of the Plan, including the Examination process, it would be more appropriate for the CSS to provide sufficient flexibility to allow for delays in its adoption. Colonnade considers an adoption date of 2011 for the CSS is a more realistic target.

Taking account of the advice in Paragraph 4.13 of PPS12, which states that the time horizon for the Core Strategy should be "at least 15 years from the date of adoption" it would be appropriate for the CSS to plan for the provision of housing to 2026 at the earliest. As such, Colonnade does not consider the CSS to be 'flexible' in the context of the tests of soundness in the table following Paragraph 4.52 of PPS12.

ii. Housing Delivery

However, setting the above aside, the Housing Chapter identifies the minimum housing delivery target for the period 2001 to 2021 of 4,600 dwellings as set out in the East of England Plan, with the annual average requirement of 250 dwellings per annum to extend provision from 2021 to 2025. It also confirms that the residual target for the period 2006 to 2021 is 3,790 dwellings, taking account of the delivery of 810 dwellings in the period 2001 to 2006, and a further 618 dwellings have been completed between 2006 and 2008.

This leaves a residual housing provision target of a minimum of 3,172 dwellings in the period 2008 to 2021. Taking into account the required provision beyond 2021, the residual housing provision target in the period 2008 to 2025 is a minimum of 4,172 dwellings. The disparity between these figures and those provided within the CSS are explained by the rounding down of the annual average delivery requirement in the period 2006 to 2021 to 250 dwellings per annum, compared with the actual figure of 252.67.

The table at Paragraph 4.6 of the CSS identifies the source of housing provision that will meet the identified minimum requirements and includes figures for 'Extant Planning Permissions' and 'Existing allocations/other appropriate sites identified in Strategic Housing Land Availability Assessment'. These figures, along with the actual completions within the period are combined to produce the figure for the 'Total without Green Belt release' figure.

Setting aside the concern regarding under-provision associated with the rounding down of the annual average delivery requirement in the period 2006 to 2021, the CSS fails to identify the sites that will contribute to the 'Extant Planning Permissions' provision. The identification of the sites that will contribute to the 'Extant Planning Permissions' should be provided in the context of the findings of the Inspector in the appeal by Asprey Homes [APP/G5180/A/07/2043219/NWF] who determined that the reliance on a delivery rate of 100% is unsafe [IR287].

Furthermore, at the time of writing these representations, the Strategic Housing Land Availability Assessment 2009 has not been published. It is impossible therefore for a full assessment of the proposed housing provision to be undertaken to confirm whether the CSS is 'founded on a robust and credible evidence base' [test of soundness in the table following Paragraph 4.52 of PPS12].

iii. Redevelopment of Employment Sites

Paragraph 4.14 of the CSS refers to the identification of the four employment sites that are considered by the Council to be suitable for redevelopment to residential use. However, the failure to publish the Strategic Housing Land Availability Assessment 2009 either before or alongside the publication of the CSS means that the assumptions made by the Council as to the suitability, availability, viability and deliverability of the sites cannot be assessed.

It has been necessary, therefore, to review the assumptions made in the Rochford Urban Capacity Study 2007 (UCS) regarding the sites. Within the section of the UCS entitled 'Redevelopment of Established Employment Land' [pages 22 & 23] includes a list of those sites assessed, their indicative capacities and the probability of residential development coming forward at the sites within the plan period (identified elsewhere as 2001 - 2021). The list includes the four sites identified in the CSS of Eldon Way/Foundry Estate, Hockley; Rawreth Lane Industrial Estate, Rayleigh; Stambridge Mills; and Star Lane Industrial Estate, Great Wakering.

In total, the UCS identifies an indicative residential redevelopment capacity of 486 units on the four sites (118, 220, 60 and 88 respectively). Of these, it identifies the Rawreth Lane Industrial Estate and Stambridge Mills as having a 'high'

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probability of coming forward for development in the Plan period (2001 - 2021), which would deliver 280 residential dwellings using the Council's own figures. The Star Lane Industrial Estate (referred to in the UCS as the Star Lane Brickworks) is identified as having a 'medium' probability of coming forward for development in the Plan period, with capacity to deliver 88 residential dwellings. It is unclear, therefore, where the figure for 'Existing allocations/other appropriate sites identified in Strategic Housing Land Availability Assessment'.

Set against this is the identification of these four sites in the CSS as being capable of delivery for residential development within the Plan period, with 671 units delivered between 2006 and 2015 and a further 506 units between 2015 and 2021.

The UCS also states in the same section that:

"There are considerable areas of land in the district that are currently allocated for, and in use as, employment land. The redevelopment of such sites for residential use would reduce demand for residential development on greenfield sites, but would at the same time create a need for alternative sites to be found for employment. Such an approach, which would be likely to require the decontamination of existing employment land to make it fit for residential use, together with development of a greenfield site and implementation of additional infrastructure to serve the new employment area, may well be unsustainable." [our emphasis]

The UCS appears to confirm therefore, that not only would the redevelopment of the four sites listed in the CSS be unlikely within the Plan period, but also potentially unsustainable. In this regard, it is notable that the promoters of Stambridge Mills sought the Screening Opinion of the Council as to whether Environmental Impact Assessment of the planning application for the redevelopment of the site for residential use was required in 2007, but to date are yet to submit a planning application for the redevelopment of the site.

In light of this, Colonnade does not consider the CSS is 'the most appropriate strategy when considered against the reasonable alternatives' [test of soundness in the table following Paragraph 4.52 of PPS12], which include the provision of residential development in East Rochford.

iv. Strategic Housing Growth to the East of Rochford

Furthermore, whilst paragraph 2.62 of the CSS identifies concern relating to the identification of locations to the east of Rochford for development on the basis that 'vehicular movements would inevitably be directed through Rochford's historic core', the CSS later identifies Stambridge Mills as a suitable site for residential redevelopment.

In light of the evident conflicts between the evidence base provided in support of the CSS and the absence of other evidence, the CSS is not considered 'sound' in the context of the tests of soundness in the table following Paragraph 4.52 of PPS12.

v. Housing Trajectory

Paragraph 4.28 of the CSS confirms that policies H1, H2 and H3 of the CSS will deliver housing supply as illustrated in the Housing Trajectory at Appendix H2. This Housing Trajectory is transposed from the 2008 Annual Monitoring Report (AMR).

Whilst on the face of it, the Housing Trajectory appears to confirm that the Council can meet its requirement to identify a five year housing supply, many of the sites identified within the AMR do not conform to the guidance issued by CLG in August 2008, on the assessment of a five year land supply. The guidance identifies sites that can be included within the five year assessment of housing supply as:

"those that are allocated for housing in the Development Plan, sites that have planning permission (outline or full planning permission that has not been implemented) and specific, unallocated brownfield sites that have the potential to make a significant contribution to housing delivery during the 5 year period".

Table 4.10: Projected Net Completions of the AMR confirms that the five year housing land supply figure includes sites from 'other land allocated for residential purposes', which are based on land allocations outside existing settlements. However, it should be clarified that these land allocations are not currently allocated for housing development in an adopted Development Plan. As such, these unallocated greenfield sites that are yet to make significant progress through the planning system should be discounted and the five year housing land supply recalculated.

The table below has been prepared to confirm the extent of the shortfall should the sites from 'other land allocated for residential purposes' be removed from the calculation of the Rochford five year housing land supply, in accordance with the guidance issued by CLG:

Recalculated Five Year Housing Land Supply (2009 - 2014):

Year
1st April 2009 to 31st March 2010
Predicted Delivery (A)

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106 dwellings
Allocations on 'other land allocated for residential purposes' (B)
0
Residual delivery (A-B)
106 dwellings
Delivery Shortfall
0

Year
1st April 2010 to 31st March 2011
Predicted Delivery (A)
217 dwellings
Allocations on 'other land allocated for residential purposes' (B)
150
Residual delivery (A-B)
67 dwellings
Delivery Shortfall
150

Year
1st April 2011 to 31st March 2012
Predicted Delivery (A)
544 dwellings
Allocations on 'other land allocated for residential purposes' (B)
300
Residual delivery (A-B)
244 dwellings
Delivery Shortfall
300

Year
1st April 2012 to 31st March 2013
Predicted Delivery (A)
395 dwellings
Allocations on 'other land allocated for residential purposes' (B)
375
Residual delivery (A-B)
20 dwellings
Delivery Shortfall
375

Year
1st April 2013 to 31st March 2014
Predicted Delivery (A)
300 dwellings
Allocations on 'other land allocated for residential purposes' (B)
300
Residual delivery (A-B)
0 dwellings
Delivery Shortfall
300

TOTAL

Predicted Delivery (A)
1,562 dwellings

Allocations on 'other land allocated for residential purposes' (B)
1,125 dwellings

Residual delivery (A-B)
437 dwellings

Delivery Shortfall
1,125 dwellings

The above table confirms that the removal of the 'other land allocated for residential purposes' from the calculation of the Rochford five year housing land supply leaves the Council with a minimum net additional housing delivery of 437 dwellings, which equates to a supply of 1.7 years based on the adjusted annual delivery target of a minimum of 255 net

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additional dwellings per annum. As such, the Council is failing to meet its requirement to demonstrate a five year housing land supply in accordance with PPS3 and the supporting guidance provided by CLG. It is notable that the recent application by David Wilson Homes at Land between Main Road and Rectory Road and Clements Hall Way, Hawkwell identifies an even greater shortfall in the Council's five year housing land supply.

In addition to the above, the AMR does not include a commentary on how deliverability has been assessed against the requirements of paragraph 54 of PPS3.

Furthermore, the guidance from CLG confirms that the windfall sites cannot be relied upon in demonstrating a five year supply unless a Local Planning Authority can demonstrate genuine local circumstances exist to allow this exception. However, the second paragraph of the section entitled 'Housing Trajectory and Five Year Housing Supply' confirms that the estimated completions in the years 2008 to 2013 includes estimated yields through 'intensification' coming forward in future years. With reference to the definition of 'intensification' on page 13 of the AMR, it appears that the 'Housing Trajectory and Five Year Housing Supply' also includes provision for windfall sites. As such, the Council is required to demonstrate the 'genuine local circumstances exist to allow this exception'.

The pressures on delivery and need for additional sites are more acute when it is considered that an average delivery rate of 204 dwellings per annum was achieved during a strong period of housing market growth. In view of the current economic downturn, and significant problems faced within the housing market, the Council should seek to identify appropriate and deliverable sites to meet its regional housing target provision commitments. Suitable sites would include Coombes Farm, which has been positively promoted for development through the LDF process.

It may, therefore, be more appropriate for the Council not merely to allocate sufficient sites to meet the minimum targets set down by the East of England Plan, but to identify a reservoir of land capable of coming forward for development should the sites identified through the CSS and Allocations Development Plan Documents (DPD) fail to come forward for development within the anticipated timescales.

vi. Appendix H1

As set out in the representations to the Preferred Options Core Strategy, there is continuing concern that the list of improvements to infrastructure required in support of residential development as set out in Appendix H1 fails to provide the necessary justification for its inclusion. Whilst the preamble seeks to clarify why the infrastructure is sought, the inclusion of this list should be fully justified, otherwise it is of little value. Furthermore, it would be of benefit to provide further details of the existing community infrastructure provision and capacity within the evidence base.

The failure to provide the necessary justification for its inclusion means that the CSS will not be 'founded on a robust and credible evidence base' [test of soundness in the table following Paragraph 4.52 of PPS12].

d) Character of Place

As set out in the representations to the Preferred Options Core Strategy, Colonnade considers that, with respect to the requirement to produce and adhere to Development Briefs for large residential developments, as set out in Policy CP1, the Council should not seek to impose further demands on developers where existing regulations provide sufficient requirements regarding design. In this instance, Design and Access Statements provide sufficient design guidelines for developments and there is no additional information provided in the policy or supporting text that clearly sets out the justification for this requirement.

e) Green Belt

With reference to the comments regarding the redevelopment of employment sites under the 'Housing' section above and the requirement to allocate sufficient land to meet the minimum housing provision targets as required by the East of England Plan, Colonnade considers that the chapter on Green Belt, and policy GB1 in particular, fails to provide the necessary evidence base that will allow it to be monitored effectively.

It is inherent that the proposed redevelopment of previously developed employment sites for residential use in order to reduce the requirement to allocate previously undeveloped land for residential use will displace these employment uses. In turn, therefore, the separate allocation of previously undeveloped Green Belt to accommodate the compensatory employment provision is required. This is accepted in principle at paragraph 11.11 of the CSS.

Without providing clarification of the anticipated quantum of land required to accommodate the provision of housing and compensatory and new employment land, it is not possible to monitor the performance of policy GB1.

However, using the Council's figures in the table setting out the breakdown of the housing provision figures in Chapter 4 of the CSS (assuming that actual completions and extant permissions are all on previously developed land), setting aside the displacement of employment uses referred to above, approximately 42% of the required minimum housing provision target is capable of being accommodated on previously developed land (2,005 units from a total of 4,750). As such, the Council is required to provide at least 58% of the required minimum housing provision target on the Green Belt (2,745 units from a total of 4,750).

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If these figures are adjusted to take account of the displacement of employment uses (assuming the provision of an equal quantity of land is required to compensate for the employment land that is redeveloped), this figure changes to 17.5% on previously developed land and 82.5% on Green Belt (828 and 3,922 units from a total of 4,750 respectively). Even allowing for the achievement of higher densities of employment on new developments, the figures above are unlikely to change significantly.

Furthermore, the table in Chapter 4 also confirms that no previously developed land will be available for development beyond 2021, or 2015 if account is taken of the displacement of the employment uses.

In light of this, not only does Chapter 6 fail to provide the necessary evidence base that will allow it to be monitored effectively, it is also necessary to consider whether it presents the most appropriate strategy for addressing the required release of Green Belt land to accommodate the defined housing and employment delivery targets to 2025 and beyond as necessary. Colonnade considers a more robust approach that is flexible and capable of being monitored, would be to clearly identify those sites capable of delivery in the short term, which for the avoidance of doubt includes those sites being promoted by Colonnade, with a reservoir of alternative sites set aside for future growth.

As set out in the representations to the Preferred Options Core Strategy, Colonnade considers that the inclusion of an affordable housing exception policy within the CSS will aid the delivery of community housing within rural areas. However, the CSS does not contain such a policy, or adequately address the issue of community housing within rural areas and the CSS is not considered to provide sufficient flexibility to allow for the delivery of essential rural housing.

f) Environmental Issues

Colonnade has concerns regarding the justification for and effectiveness of a number of the policies contained within the Environmental Issues chapter, as follows:

â€¢ Policy ENV1: The Council fails to identify how it will "maintain, restore and enhance" the sites of nature conservation importance that are identified, or how the performance of this policy will be monitored;

â€¢ Policy ENV3: In the context of the advice at paragraph 4.32 of PPS12 regarding the reformulation of national policies, Colonnade does not consider that this policy is required; and

â€¢ Policy ENV9: As set out in the representations to the Preferred Options Core Strategy, Colonnade does not consider that the necessary evidence base has been provided to justify a policy that seeks to go above and beyond the policy targets for the Code for Sustainable Homes as set out by Central Government.

g) Community Infrastructure, Leisure and Tourism

Policy CLT1 refers to the requirement for residential and employment development to contribute to the infrastructure identified in Appendix CLT1 through Standard Charges.

However, whilst the general principle of securing planning obligations through the application of standard charges is broadly accepted, the list of infrastructure requirements set out in Appendix CLT1 is not supported by sufficient evidence base to identify its robustness and credibility. As such, Colonnade does not consider either policy CLT1 or Appendix CLT1 is justified in the context of PPS12.

It is also noted that, despite the clarification sought by Colonnade at the Core Strategy Preferred Options stage, the CSS fails to confirm what information should be contained within Health Impact Assessments, which are required by policy CLT4. Once again, Colonnade requests further clarification of what is involved in the assessment and the expected outputs, which will provide greater clarity and will allow the policy to be monitored.

h) Transport

Policy T8 confirms that the Council will apply minimum parking standards. As set out in the representations to the Preferred Options Core Strategy, the guidance in Planning Policy Guidance Note 13: Transport (PPG13) is clear regarding the imposition of parking standards.

Paragraphs 52-56 of PPG13 confirm that the Local Planning Authorities should apply maximum not minimum parking standards. In order to satisfy the legal requirements set out in PPS12, the policy must reflect PPG13 to promote sustainable transport choices and further provide incentives for developers to locate further residential land closer to local service centres by requiring maximum parking standards for residential developments.

i) Economic Development

As set out in the representations to the Preferred Options Core Strategy, the land at Three Ashes Farm provides an excellent opportunity to deliver employment growth in the short term and may be a suitable site for the 'Eco-Innovation Centre' that is being promoted by the Council. Its identification as a suitable location for strategic employment growth, or the provision of an Eco-Innovation Centre, would accord with the general principles of the policies contained within Chapter 11.

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O - 16256 - 9177 - Policy ENV9 - Code for Sustainable Homes - i

16256 Object

CHAPTER 8 Policy ENV9 - Code for Sustainable Homes

The identification of Purdeys Industrial Estate as fit for purpose (in paragraph 11.32 and the Council's 2008 Employment Land Study 2008) and therefore it should be maintained and if possible expanded, is welcomed and Colonnade considers that Three Ashes Farm could deliver this expansion, providing a natural extension to Purdeys Industrial Estate and being strategically located close to the Airport.

Three Ashes would address the negative impacts that the nearby residential area experiences from the existing Industrial Estate by providing a buffer between established uses and the residential area with less intensive employment activities. The highways analysis that has been carried out has suggested that it would not have an adverse impact on roads and congestion. Furthermore, there are very few opportunities for businesses to expand and Three Ashes could provide this opportunity.

j) Conclusions

Following the submission of representations to the Preferred Options Core Strategy, Colonnade is disappointed to note that the CSS fails to take account of the majority of the issues raised in their representations.

In addition, Colonnade considers the plan to be 'unsound' as the document consistently fails to meet the tests of soundness set out in the table following Paragraph 4.52 of PPS12 and respectfully requests that the Council notifies Icen, on behalf of Colonnade, of the future arrangements for the Examination of the Core Strategy. Furthermore, Colonnade wishes to take this opportunity to formally register a request to appear at all stages of the Examination in Public, including the pre-hearing meeting and any planned hearing sessions whereby issues raised in the context of this letter are to be discussed. Please confirm this request, and that the representations made to the Preferred Options Core Strategy will be taken into account alongside the current representations, by way of return to this letter.

Icen Projects, on behalf of Colonnade Land LLP trusts that the Council will find these representations to be constructive and helpful in taking forward the Core Strategy. Should you wish to discuss any aspect of these representations further, please do not hesitate to contact us.

Summary:

Policy ENV9: As set out in the representations to the Preferred Options Core Strategy, Colonnade does not consider that the necessary evidence base has been provided to justify a policy that seeks to go above and beyond the policy targets for the Code for Sustainable Homes as set out by Central Government.

Change to Plan

Appear at exam? Yes Soundness Tests i

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O - 16819 - 9676 - Policy ENV9 - Code for Sustainable Homes - i, ii, iii

16819 Object

CHAPTER 8 Policy ENV9 - Code for Sustainable Homes

Respondent: Bellway Homes [9676]

Bellway Homes
Bellway House
Bury Street
Ruislip
Middlesex
HA4 7SD
UK

Agent: Barton Willmore LLP (Mr E Hanson) [14266]

Barton Willmore LLP
7 Soho Square
London

W1D 3QB

020 7446 6888

Full Text:

See statement

Council ref AE18 and AE18a

Summary:

See statement

Council ref AE18 and AE18a

Change to Plan

See statement

Council ref AE18 and AE18a

Appear at exam? Yes

Soundness Tests i, ii, iii

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S - 16856 - 9889 - Policy ENV9 - Code for Sustainable Homes - None

16856 Support

CHAPTER 8 Policy ENV9 - Code for Sustainable Homes

Respondent: Environment Agency (Miss Carrie Williams) [9889] **Agent:** N/A

Environment Agency
Iceni House
Cobham Road
Ipswich
Suffolk
IP3 9JD
United Kingdom
01473 706007

Full Text: We support the inclusion of this policy because it is in line with government objectives as set out in "Building a Greener Future: Towards Zero Carbon Development" and it will also go some way to address the issues of water efficiency highlighted in the "Essex Thames Gateway Water Cycle Study Scoping Study" (March 2009).

Summary: We support the inclusion of this policy because it is in line with government objectives as set out in "Building a Greener Future: Towards Zero Carbon Development" and it will also go some way to address the issues of water efficiency highlighted in the "Essex Thames Gateway Water Cycle Study Scoping Study" (March 2009).

Change to Plan N/A

Appear at exam? No **Soundness Tests** N/A

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S - 16884 - 8329 - Policy ENV9 - Code for Sustainable Homes - None

16884 Support

CHAPTER 8 Policy ENV9 - Code for Sustainable Homes

Respondent: Swan Hill Homes Limited [8329]

Swan Hill Homes Limited
C/O Agent
Mr P Kneen
Charles Planning

Agent: Charles Planning Associates Ltd (Mr P Kneen) [5040]

Charles Planning Associates Ltd
1644-1645 Parkway
Solent Business Park
Whiteley
Fareham
Hampshire
PO15 7AH
01489 580853

Full Text:

1.0 Instruction and Introduction

1.1 Charles Planning Associates Limited (Chartered Town Planners) is Instructed by Swan Hill Homes Limited (Swan Hill) to prepare and submit representations on their behalf in respect of the Rochford District Local Development Framework: Core Strategy Submission (September 2009) Development Plan Document.

1.2 The comments refer to the relevant sections and policy designations in the Submission document, as appropriate.

1.3 The comments set out in this submission are intended to assist the District Council in taking forward its Local Development Framework. It is our intention to continue to be involved in the LDF preparation process and we look forward to the opportunity to comment further at the Examination to the Core Strategy.

1.4 If you have any queries regarding the content of this submission then please do not hesitate to contact:

Peter Kneen BSc (Hons) MSc MRTPI
Planner

2.0 Housing:
Policy H1 - The Efficient Use of Land for Housing

2.1 Swan Hill recognises the importance of seeking to concentrate new developments mainly in the existing urban areas, on previously developed land where possible, particularly in view of the Government seeking to ensure 60% of all such new developments are on previously development land (PDL).

2.2 However, given the character of the District, and the strategic housing requirement of the East of England Plan, Swan Hill supports the approach that the Council must also make provision for additional development on the edge of existing settlements on greenfield sites, particularly in the most sustainable locations. As such, Swan Hill supports that where feasible, the redevelopment of existing employment sites for residential/employment purposes can make a contribution towards the strategic housing requirement, provided that sufficient additional employment land is brought forward to ensure the stability of employment levels in the District, and to ensure employment growth meets the East of England Plan requirements.

2.3 Swan Hill considers that Policy H1 should include consideration that new extensions to existing settlements have regard to their potential impact on the wider characteristics and openness objectives of the Green Belt.

Policy H2 - Extensions to Residential Envelopes and Phasing

2.4 Swan Hill generally supports the approach taken by the Council in this policy. As set out above, Swan Hill consider the Council's acknowledgment that housing requirements should be met through the allocation of land on the edge of the existing settlements is the most suitable way forward to meeting the Council's strategic housing requirement and complies with the advice in PPS3.

2.5 The need for suitable greenfield urban extensions represents the best way forward for the Council to meet its strategic housing requirement, as set out in the East of England Plan. Swan Hill supports the recognition that the potential supply of alternative previously developed sites is limited, without detrimentally affecting the character of the District, and therefore the best way forward is the use of sustainable greenfield urban extensions to the existing settlements of the District.

2.6 However, Swan Hill consider that a fundamental consideration that the District Council should consider relates to the potential impact of the urban extensions on the Green Belt policy has been somewhat overlooked. The wider sustainability credentials of the settlements of the District should only be one of many key considerations for determining the level of expansion. In view of the proximity of Southend-on-Sea to all the main settlements of the District, and the influence this has on the likely location many people would travel for employment and leisure, sustainability of many of the settlements is not a key overarching factor, and greater weight should be placed on the potential impact on the openness of the Green Belt, as this cannot be remedied if development occurs in the wrong location.

2.7 As such, Swan Hill considers that determining the location of growth for the main settlements should be to identify

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S - 16884 - 8329 - Policy ENV9 - Code for Sustainable Homes - None

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those locations where the impact on the wider setting of the Green Belt can be minimised. Further justification for those general locations chosen should be identified in Policy H2. In this regard, Swan Hill has serious concerns regarding the removal of Land South West of Great Wakering as a viable option for the growth of the settlement. The development of this area of Great Wakering, in addition to the potential redevelopment of the Star Lane Industrial Estate could provide a more comprehensive development, whilst ensuring that the wider openness of the Green Belt is maintained. Land South West of Great Wakering is significantly better placed to limit the impact on the wider Green Belt than Land West of Great Wakering, and could contribute to the provision of an important amenity and wildlife site for the local community.

2.8 In addition, Swan Hill consider that the Council now has no reserve provision in the event that any of the existing employment sites set out in Policy H1 fail to come forward for development within the envisaged timescale. Further, Land West of Great Wakering has not been identified in the SHLAA as a deliverable site to help meet the strategic housing requirement, contrary to the requirement set out in PPS3.

2.9 As such, Swan Hill would support the provision of suitable sites which could be safeguarded for future development in the likelihood of a shortfall in supply.

Policy H3 - Extensions to Residential Envelopes Post 2021

2.10 As set out above, Swan Hill supports the overall approach the Council has taken towards the provision of sustainable urban extensions as a suitable means of meeting their strategic housing requirement. However, as set out for Policy H2 above, Swan Hill has serious concerns regarding the removal of several proposed sites set out in the October 2008 Preferred Options Core Strategy, without any guarantee of the ability to deliver those sites set out in Policy H1.

2.11 As also considered above, the inclusion of West of Great Wakering for 250 dwellings should not be included ahead of South West of Great Wakering, in view of the fact that the site is not identified in the SHLAA as available, suitable and achievable as required by PPS3, and thus is not supported by a robust and creditable evidence base for its inclusion as a strategic site for development.

2.12 Whilst Swan Hill acknowledge that alterations to Policy H1 has resulted in the removal of some locations for growth in Policy H3 (as set out in the Sustainability Appraisal), Swan Hill does not consider that the most appropriate locations have been chosen.

2.13 In addition to the matters raised above, the use of West of Great Wakering would also result in the loss of valuable agricultural land, which clearly in a Green Belt location, should be less suitable for development than other sites, such as South West of Great Wakering, which would have limited impact on the wider Green Belt policy, and not result in the loss of valuable agricultural land.

2.14 Finally, in respect of Policies H1, H2 and H3, all of the above comments are based on our interpretation of the Submission Version Core Strategy when compared to the October 2008 Version of the Core Strategy. Without the ability to undertake a detailed assessment of the Council's SHLAA, it is not possible to clarify the proposed Core Strategy position regarding the proposed direction of growth proposed for the settlements in the District. As such, Swan Hill reserves the right to make additional representations regarding the proposed Policies H1, H2 and H3 following the publication of the SHLAA in due course.

Policy H4 - Affordable Housing

2.15 In general terms, Swan Hill supports the approach taken by the Council towards the provision of affordable housing for new residential developments. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H5 - Dwelling Types

2.16 Swan Hill supports the policy provision of H5, and considers that the approach taken by the Council for this policy represents a suitably flexible alternative to stipulating percentages of dwelling mix, sought by some local authorities. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H6 - Lifetime Homes

2.17 In regard to this policy, Swan Hill objects to the Council's policy where all new dwellings should be provided to the Lifetime Homes Standard. Whilst it is acknowledged that the UK has an aging population, Swan Hill considers that seeking to provide Lifetime Homes on all sites is considered to be overly onerous for proposed developers, particularly when considering the requirement for all car parking spaces to be suitable for disabled users, which could result in more schemes becoming unviable. Therefore, the provision of a percentage of Lifetime Homes should be considered through negotiations with the Council at the planning application stage, and should be determined on a case-by-case basis.

3.0 Character of Place: Policy CP1 - Design

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3.1 The Town and Country Planning (General Development Procedure) Order 1995 (As Amended) makes the submission of a Design and Access Statement for most types of planning applications a Statutory requirement, and as such, the provision of a Design Brief represents a pre-requisite of all major planning applications.

3.2 Policy CP1 seeks to ensure the provision of good, high quality developments that reflect local characteristics and distinctiveness, this ideology is supported by Swan Hill.

4.0 The Green Belt:
Policy GB1 - Green Belt Protection

4.1 Following the amendments to the wording of the Policy since the October 2008 Preferred Options Core Strategy, Swan Hill is now generally supportive of Policy GB1 and its supporting text. However, as expressed above, it is important that where alterations to the Green Belt boundary occur as a result of the extension of the settlements to meet the strategic housing requirement, both the minimal amount of land is taken and where that land is taken for development, it represents the best available land which has a minimal impact of the wider openness characteristic of the Green Belt.

5.0 Environmental Issues:
Policy ENV3 - Flood Risk

5.1 Swan Hill generally supports the approach set out in Policy ENV3 regarding ensuring development accords with the sequential test of PPS25. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV4 - Sustainable Drainage Systems (SUDS)

5.2 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV4. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV8 - On-site Renewable and Low Carbon Energy Generation

5.3 Whilst Swan Hill recognises the importance of reducing carbon emissions, particularly in new housing developments, and the role this can play in reducing the nations overall Greenhouse emissions. As such Swan Hill is generally supportive of Policy ENV8. It is noted that Policy ENG1 of the East of England Plan sets out a threshold of developments comprising 10 or more dwellings. Swan Hill consider it important for the District Council to justify the reduction in the threshold level.

5.4 Further, no assessment of Policy ENV8 has been set out in the Sustainability Appraisal which justifies the change in threshold from that of Policy ENG1 of the RSS.

Policy ENV9 - Code for Sustainable Homes

5.5 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV9. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

6.0 Community Infrastructure, Leisure and Tourism:
Policy CLT1 - Planning Obligations and Standard Charges

6.1 Swan Hill generally supports the overall approach the Council has taken in Policy CLT1. It is considered Policy CLT1 sets out a degree of flexibility to ensure that all sites are considered on a site-by-site basis, assessing the individual merits of each planning application, in order to ensure the levels of contributions applicable meet the five tests of Circular 05/05. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policies CLT5 - Open Space;
CLT7 - Play Space;
CLT8 - Youth Facilities; and,
CLT10 - Playing Pitches

6.2 Swan Hill supports the need for new residential developments to incorporate a degree of new publicly accessible open space, children's play space, youth facilities and playing pitches, and as such, generally supports the policy approaches taken by the Council.

6.3 However, it is important that whilst the Council may seek to undertake an assessment of providing standard charges for new development, which, as set out in Policy CLT1, this should be based on thorough public consultation and consideration and sound justification. Swan Hill consider that within the provision of a standard charge, it is important that such provision allows for a degree of flexibility to ensure that each site is assessed individually and on its own merits. This is particularly important for those sites close to existing open spaces and facilities. As such, the levels of

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open space and recreation facilities required in the 'standard charge' should be based on an up-to-date PPG17 Open Space assessment, which should be used to form a key consideration in the levels of provision likely to be required in the standard charge system proposed.

7.0 Transport: Policy T1 - Highways

7.1 Swan Hill supports the overall objectives set out in Policy T1 requiring developments to be located and designed to reduce the reliance on the private car and to meet the infrastructure needs generated by development or seek to help achieve these needs is acceptable in principle.

7.2 Swan Hill recognises the importance of providing sufficient infrastructure provision to meet the requirements of development, and that where developments have insufficient consideration of impact on existing infrastructure, they should be considered unacceptable and contrary to National policy guidance. However, Swan Hill considers it important to emphasise that the developer's role should not be seen as a means to meet existing shortfalls in provision.

Policy T3 - Public Transport

7.3 Swan Hill is generally supportive of the policy approach set out in T3, however, as set out in paragraph 7.2 above, it is important that the District Council do not consider that it is the developer's responsibility to resolve existing shortfalls in provision of public transport, and any contribution towards additional public transportation provision should only be to mitigate against the additional level of demand likely from the development proposed.

Policy T5 - Cycling and Walking

7.4 Swan Hill supports the general approach to this policy, as Swan Hill recognises the importance of promoting the use of alternatives to the private car. The policy provision acknowledges the need to ensure relevant contributions in the event of additional travel demands generated by individual developments, whilst also setting out additional aspirations for the cycle network in the District.

7.5 As such, Swan Hill considers this policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy T8 - Parking Standards

7.6 The Council has recently (January 2007) adopted SPD on the requirements for parking standards, and as such, Swan Hill generally supports the policy approach chosen by the Council. As set out in the SPD, whilst Swan Hill generally supports the approach taken by the District Council towards setting residential parking standards, in that the Council has recognised that in the suburban areas, even with some access to public transport, the majority of residents will rely on the use of private cars. However, Swan Hill has concerns over the failure of the District Council to comply with the provisions of PPG13: Transport (2001) which sets out that Local Planning Authorities should not set minimum standards for car parking. Whilst it is acknowledged that PPS3 sets out provision for the consideration of local circumstances, it is considered that the Council has not justified this deviation from PPG13's maximum standard.

7.7 Whilst it is acknowledged that such justification may become apparent through the work currently being undertaken by Essex County Council, until such time, the District Council should only seek to apply the maximum standards indicated in PPG13. However, Swan Hill recommends that the District Council make provisions in the wording of the Policy to allow for changes in the event that future policy on car parking standards need to reflect the County standard, following the completion of the County Council review.

8.0 Economic Development: Policies ED3 - Existing Employment Land ED4 - Future Employment Allocations

8.1 In respect of Policies ED3 and ED4, Swan Hill notes that they have changed considerably since the October 2008 Preferred Options document, in that they are site specific regarding the location of the proposed redevelopment of existing employment sites. These four sites are also identified in Policy H1 - Efficient Use of Land, and in general, Swan Hill supports the approach to the redevelopment of these sites (where feasible) based on the assessments of the sites set out in this version of the Core Strategy.

8.2 However, Swan Hill has concerns that these policies might not be considered suitably sound given that insufficient opportunity has been allocated for consultation on their redevelopment. Without the SHLAA being publically available prior to the consultation on this Core Strategy, an insufficient evidence base has been provided to corroborate that these sites are neither suitable or deliverable to meet the test of soundness requirements.

Summary: Policy ENV9 - Code for Sustainable Homes

5.5 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV9. The Policy accords with the advice of National Policy and is therefore considered

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S - 16884 - 8329 - Policy ENV9 - Code for Sustainable Homes - None

16884 Support

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sound by Swan Hill.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

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O - 16930 - 10009 - Policy ENV9 - Code for Sustainable Homes - iii

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Representations on the Core Strategy
Submission Document, November 2009
On behalf of Barratts Eastern Counties

Introduction

The requirements of Core Strategies are enshrined in the 2004 Planning and Compensation Act, the Town & Country Planning (Local Development) England (Regulations) 2004 and the 2008 policy guidance in PPS12. The requirements of Coe Strategies are clear. And they are legal requirements. The Core Strategy must comply with the Local Development Scheme, Statement of Community Involvement and the Regulations. The Core Strategy must be subject to a sustainability appraisal, have regard to national guidance, conform generally with the Regional Spatial Strategy and have regard to any Sustainable Community Strategy. A Core strategy must be sound - justified, effective and consistent with national policy. The following representations therefore focus on these legal requirements.

HOUSING

Paragraph 4.6 - Evidence Base

To meet the soundness test Submission Core Strategies (SCS) must be justified, that is to say it must be founded on robust and credible evidence base and comprise the most appropriate strategy when considered against reasonable alternatives. The housing strategy in as far as it identifies a need for Green belt sites is sound, however, there are other elements which are unsound.

Paragraph 4.6 notes that the Strategic Housing Land Availability Assessment (SHLAA) has examined the supply of housing. It is presumed that the Table at paragraph 4.6 is the outcome of this examination. Whilst the SHLAA has some legitimacy in that it identifies various sites that are apparently available, we are concerned that because the SHLAA was only published in November 2009 it post dates the SCS. This implies that the SCS is driving the SHLAA exercise rather than the other way round. Whilst this may have no real practical effect on the outcome of the SCS and the identified need for Green Belt sites, the Inspector will be mindful of the advice in paragraphs 33 and 54 of PPS3 that SCS draw on the evidence in SHLAA. It may be that the SCS should explain how the evidence base has been used to justify the strategy.

PPS12 explains at paragraph 4.37 that Core Strategies are based on thorough evidence. Since the SHLAA has only recently been published it is considered that the SCS is unsound as it is not justifiable. This, together with other comments on the SCS, indicates that the process should be delayed to ensure that a more robust document is placed in front of the EiP Inspector.

Table at Paragraph 4.6 - Evidence base

From our review of the available evidence it would appear that the housing land supply is insufficient and that Green Belt release are required. From the wider strategy being promoted we note that some of the sites that the District Council consider to be 'appropriate' are likely to relate to existing employment areas. As set out elsewhere in our representations, we maintain severe reservations that the redevelopment of existing employment sites for alternative uses and particularly the Eldon Way Industrial Estate is unsustainable. We will make reference to the effectiveness of this strategy in relation to sustainability, whether it is justified in the context of National Policy and the deliverability of such a strategy elsewhere.

In particular, paragraph 11.32 of the SCS refers to existing employment land and sites within the UCS. It does not refer the SHLAA and as such it appears that an evidence base to support the re-use of employment land for residential is not reported in the SCS.

Having reviewed the 2008 Annual Monitoring Report, as we did when commenting on the 2008 Preferred Options Core Strategy, we maintain severe doubts as to the appropriateness of some of the previously developed sites identified as potential housing sites and their expected housing yield. Whilst we cannot at this stage ascertain whether the SHLAA

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sites referred to in this table correlate with the Annual Monitoring Report and indeed the 2007 Urban Capacity Study, it is our view that there will be some commonality and so the reliance on these sites is likely to be at odds with Government Policy. We shall elaborate on this objection in relation to the specific housing policy below.

We note that the last two rows in the Table at paragraph 4.6 set out figures with and without Green Belt releases. The text to this section of the Core Strategy should, for reasons of clarity, explain that Green belt review will be necessary in order to deliver the required housing.

Paragraph 4.9

The table on page 40, which sets out the settlement tiers, is supported. Rayleigh, Rochford/Ashingdon, Hockley/Hawkwell are clearly the largest settlements in the District and they benefit from good employment, housing, leisure, community and public transport provision. These settlements are the most sustainable ones with the greatest mix of uses. Consequently, it is sensible that the Core Strategy identifies these as top tier settlements and is able to target them with growth accordingly. This component of the strategy is justified by reference to sustainability data and is effective, since targeting development at these locations will ensure a more sustainable pattern of development.

Paragraph 4.14

We maintain that the strategy for redeveloping the Eldon Way Industrial Estate for housing and other alternative uses to employment is unsound. It is neither justified nor effective. The Industrial Land Availability Study 2006 sets out on page 7 strategic objectives. The 3rd objective seeks to Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive. Clearly the strategy as currently drafted envisages major changes to existing industrial estates, including alternative uses. This strategy is not consistent with other strategies and evidence based studies and so cannot be justified in the context of the tests set out in PPS12. It is also an ineffective strategy since the new employment locations that would free up the Eldon Way site for redevelopment relies on transport infrastructure that has no certainty of being delivered. Principally, the erosion of employment uses at Eldon Way could make the settlement of Hockley/Hawkwell less sustainable and thus conflict with the tiered approach on page 40, paragraph 4.9.

Policy H1

Prioritising the use of previously developed land ("pdl") is supported in principle. It is a justified strategy in the context of PPS3 and effective as sequential choices can be made by implementing the policy. However, the District Council is also promoting a strategy which seeks the redevelopment of existing employment locations to alternative uses and by consequence is identifying green field sites for new employment development elsewhere (Policy ED4 refers). This 'land swapping' is not considered consistent with PPS3, nor is it considered to be justified or effective in delivering the desired strategy. This is particularly the case as most of the existing employment sites are occupied and therefore unavailable for redevelopment. In addition, the new Greenfield sites are in an arguably less sustainable locations away from the top tier settlements identified on page 40 of the Submission Core Strategy. Clearly this element of the strategy is inconsistent with the wider strategy.

The Industrial Land Availability Study 2006 is included as an evidence base by the District Council. It includes an introductory section, which explains that the authority wishes to make Rochford the place of choice for new business. It includes several strategic objectives on page 7 including "Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive." It reviews existing employment areas and identifies vacant land, including land available from allocations. It does not include any assessment of new sites or potential opportunities for new sites that might have been expected to feed into the Core Strategy. The strategy for identifying Green Belt site employment allocation does not appear to be based on any evidence in this document and in that context cannot be justified. The strategy being promoted potentially conflicts with Government policy in PPG13, PPG2 and emerging PPS4.

The Employment Land Study 2008 is a much later document. It has a key recommendation on page ii "we recommend that Rochford District Council adopts strong policies to protect existing employment land." Furthermore under recommendations for existing sites on page iii-iv of that document it states "In our view, Hockley Trading Centre is a strategically well placed employment location. However, we recognise the ambitions of the Hockley Town Centre masterplan and that within this the Council should consider it to be allocated for other uses. However, we recommend that this reallocation happen only if provision is made within the masterplan for office use within Hockley Town Centre as part of a mixed use scheme." The view of the writers of this document is clear - the Eldon Way Industrial estate (Hockley Trading Centre) is a good employment site and that it is for other reasons that alternative uses are being considered and only then if office development is supported. This supports our representations that new future uses at the Eldon Way site should be employment dominated and that alternative uses should relate to the objectives of the Town Centre which is to enhance the shopping and leisure facilities. Residential is not an appropriate alternative.

This document recommends the use of land to the west of Rayleigh for employment and envisages Green belt release. However, the SCS does not explain through the evidence base why existing employment sites should be 'deallocated' and Green belt land unnecessarily used.

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In addition to these key issues we have some specific concerns. As a consequence we maintain an objection to the second paragraph of Policy H1. This policy states that the Council will seek the redevelopment of various industrial estates including Eldon Way. The Policy says that alternative uses will be sought (presumably alternative to the existing employment offer) and that new land will be allocated elsewhere. This policy statement, in relation to Eldon Way in particular, is unsound for a number of reasons:

The emerging Hockley Area Action Plan consulted upon in 2008 states that the Eldon Way Industrial Estate is strategically well placed. In a sense this statement underplays the true importance of this highly sustainable employment location and only major employment area in Hockley/Hawkwell. The employment area is adjacent to the railway station and located a short distance from the main bus routes that run along Spa Road. Some of the residential areas of the town are also within walking distance of this commercial area, thus providing a potential for sustainable travel by employees. The Eldon Way Industrial Estate is therefore right at the heart of the settlement of Hockley/Hawkwell and provides an opportunity to meet sustainable transport objectives by reducing the need to travel by car. Consequently, this employment area should be highlighted as a premier employment site in sustainability terms, both in the context of PPG13, PPG4 and PPS6. To encourage alternative uses as set out in Policy H1 implies the removal of the majority of employment based activity at Hockley/Hawkwell and this would be contrary to National policy, would not be the most appropriate strategy when considered against alternatives and is therefore unsound.

Whilst it is acknowledged that improvement to the Eldon Way Industrial Estate can and should take place, the extent to which the mix of employment uses should be altered in favour of alternative land uses requires careful consideration. It is our view that a mix of existing or indeed new employment land uses with some Town Centre type uses should dominate the Eldon Way site. A mix of employment types between offices, light industry and other high technology industries should be encouraged as this will provide many locational advantages to the firms that agglomerate together. The Council says that the existing uses on this site are harmful to amenity. However, the site has operated for many years without any significant issues and if renewal for B1 type uses are encouraged then the employment area can be maintained without harm to amenity. Renewal of the employment stock can help develop and improve trade, improve the sustainability of businesses as a whole and make for a more flexible labour market as skill levels are varied. A singularly different use altogether or a variety of uses which excludes employment could undermine the long term sustainability of the area and Town Centre. As such Policy H1 is not an effective strategy and should be amended to acknowledge the importance of Eldon Way and the need to renew the employment stock to ensure that the site maintains its important role as a employment site, albeit with some ancillary alternative use development where appropriate.

The 2008 Retail Study notes that Hockley Town Centre is not strong and there is trade leakage. Eldon Way Industrial Estate provides a customer base for existing town centre uses. Weekday spending within town centres is an important contributor to the viability of many retail and leisure businesses either through expenditure by employees during the lunchtime trade or expenditure by employers, on necessary goods and services. This relationship helps sustain the critical mass of a centre and provides a platform for new retail and leisure growth. It is important to have a balanced centre with a variety of uses. Policy H1, as currently drafted, implies the removal of employment related development and this is likely to harm the vitality and viability of Hockley Town Centre. The Council has presented no evidence to suggest that this is not the case. Importantly, the 2008 Retail Study explains that there is a need for additional retail and office space. In principle we would support additional office and other B1 type uses plus retail but employment uses should always dominate for the sustainability reasons given above. Retail and office development are likely to present a viable alternative to some of the more industrial type uses.

Consequently, we do not support the phrasing of the third paragraph of Policy H1 and maintain that the most appropriate strategy is to seek renewal of the employment stock with employment based uses and with some new retail development. Removal of employment land uses completely as currently implied-which was the approach adopted in the emerging Hockley Area Action Plan - is not a justifiable strategy.

One of the key tests of a Core Strategy is consistency between policies in the emerging Plan and this strikes at the heart of demonstrating an effective strategy. Policy H1 implies alternative uses to employment and the relocation of Eldon Way to a site identified under Policy ED4. However, Policy RTC6 sets out a suite of policy criteria for Hockley Town Centre which includes employment and commercial activities. In addition Policy ED3 seeks the protection of sustainable employment sites (Eldon Way) and notes that some reallocation of existing employment sites will include a proportion of employment. It notes that in the case of Eldon Way employment development will form a component. The policies appear at odds with one another. The third paragraph of Policy H1 should be deleted as the second paragraph is sufficient to set a strategic context for delivering new housing development. The employment policies and Hockley specific policies should be left to consider the type and quantum of land uses appropriate in the area. If the third paragraph of H1 is to be retained then it should tie in more with Policy RTC6 and in our view explain that employment uses should dominate any redevelopment proposals for the Eldon Way site and that retail and leisure uses should be a supporting proportion.

Implementation, Monitoring and Delivery - page 132 onwards

One of the key tests of soundness is that the Core Strategy should be effective - it should be able to deliver its strategy. The Implementation strategy set out at page 132 onwards of the Core Strategy does not explain how Policy H1, RTC6 and the strategy for redeveloping Eldon Way (Policy ED2 and ED3) will be delivered. The comment at Policy ED3 on

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page 161 identifies it as a potential risk and alludes to land assembly difficulties and the choices to be made by owner/occupiers. In order to deliver the strategy there should be a clear understanding as to whether the new land use values being promoted are sufficient to encourage relocation voluntarily. Secondly there is a need for more information to be gathered and presented to show that current occupiers and landowners are willing to relocate and the timescales likely for this. For example, do the building lease contracts enable early review or are there any break out clauses. There should be some commentary on whether the Council will engage in compulsory purchase orders to pursue their strategy should the 'encouragement' route fail. As currently drafted there is no clear path to deliver the strategy and the danger is that despite reallocation, the sites identified for redevelopment will not come forward in the plan period. In this regard, evidence to satisfy the test of soundness is not provided.

Policy H2 - General Locations

We support the strategy that new housing growth should be targeted at land South of Hawkwell. This area is suitably located to the urban area of Hockley/Hawkwell and to tie in with the settlement tiers on page 40 of the Submission Core Strategy the same terminology for settlement should be used. This ensures a consistency within the SCS. The choice of this location as a housing growth area is appropriate as it would not contribute to the coalescence of the urban area with Ashingdon (there is existing development between this identified housing area at Rectory Road and Ashingdon and moreover, Rectory Road can form a natural physical boundary for the new Green belt boundary. This area is also well located to the existing road network. Cherry Orchard Way has recently been improved and provides much better accessibility to the proposed housing growth area than any other location around Hockley/Hawkwell. The existing bus routes along Rectory Road also make this location sustainable and the additional housing proposed will help underpin the financial viability of bus routes in this area. Locally there are employment opportunities, including the small commercial estate off Main Road. The Eldon Way Industrial Estate adjacent to the Town Centre also provides the opportunity for employment locally. Extensive public open space, play pitches and built leisure facilities are located just to the north of this area and a community hall is located off Briar Close, nearby. The area to the south of Hockley/Hawkwell is close to local shops on the corner of Heycroft Road and Main Road and there are numerous footpath links between this area and the local community including links via Thorpe Road, Thorpe Close, Briar Close, Hawkwell Park and Park Gardens. The area therefore provides the opportunity to enhance existing links, including cycle links, and contribute towards community integration - more so than other sites on the south side of this settlement. The site is also in the control of one house builder and deliverable.

However, we find that the Policy is not fully consistent with national policy and furthermore needs to be reviewed in order to be justified and effective. We have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with this policy and feel that Green Belt review should be more explicit throughout the SCS. We note that it is only Policy H3 which indicates the need for Green Belt land review. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H2 and certainly Policy H3 and Policy GB1 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary.

Policy H2 - Phasing and Quantum

The 2008 Preferred Core Strategy document indicated that the area south of Hawkwell should deliver 330 dwellings over a phasing period to post 2021 (see Policy H2 and H3 of that document). The SCS reduces the quantum of housing in this area to 175 but expects delivery by 2015. At a broader level the Preferred Options Core Strategy of 2008, (Policy H2) required 1,450 dwellings to 2015 and a further 1,050 by 2021. In the SCS the figures are now 775 and 1,010 respectively.

Since the SHLAA post dates the publication of the SCS, we are uncertain as to the reason why such a significant reduction in quantum of housing and extensions to the residential envelope is considered necessary. Presumably it is the 'new' strategy to redevelop existing employment areas within the settlements that has led to this change. Our representations on this strategy and specifically the Eldon Way Industrial Estate are included elsewhere within our representations. Previously we have commented on the Table at paragraph 4.6 of the Submission Core Strategy and the lack of evidence to underpin that table. It seems odd that in the space of a year the expected requirement for Greenfield sites has effectively halved on the basis of a SHLAA exercise. The community is therefore not able to effectively

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comment on the housing land supply and at this stage the Submission Core Strategy is legally unsound.

That said, we are of the view that the quantum of housing envisaged south of Hockley/Hawkwell should be more than the 175 currently envisage. In coming to this view we have reviewed the Urban Capacity Study and the latest housing figures in the Annual Monitoring Report 2008. We conclude that the shortfall in housing land supply is such that 330 dwellings in this location is appropriate.

The recently published SHLAA is based upon the data obtained from the Urban Capacity Study 2007, a call for sites exercise and data from the Annual Monitoring Report 2008.

The 2007 Urban Capacity Study (UCS)

1. 2007 is widely recognised as being the peak level of house prices in the UK and it was acknowledged by Government and practitioners alike that 2007 house prices were at an unsustainable level. It is our view that utilising the 2007 UCS as an evidence base without reference to the market does not pick up the depressed demand that is likely to now exist. Recent corrections to the housing market now mean that housing land prices are at a much lower and arguably more affordable level than before. The implications are that some pdl may not be viable for housing development. Often brownfield sites have much higher development costs than Greenfield sites and so the yield from urban capacity will be much lower than anticipated in the 2007 study. One example is the employment allocation of the Adopted Local Plan located at 76-92 Main Road, Hawkwell. This site has been allocated for several years and has been available during the most recent rises in residential property prices during 2006-07. As a consequence the lack of progress on the site can only be described by its current occupancy and perhaps it comprises high value uses that do not encourage redevelopment. Despite this the site is identified as having high potential for alternative use and high potential demand. The SHLAA form notes that there is no information on legal constraints (e.g., tenancy agreements) As a consequence it is difficult to see how this could continue to be a potential site and as a consequence the allowance for green field releases should be increased.

2. There are considered to be other instances in the UCS and the recently published SHLAA where the assumptions and calculations would indicate that the 1301 urban capacity figure is over optimistic and the SHLAA assessment is limited. In the assessment of 'non-residential sites in appropriate locations' within the UCS assumptions are made as to the probability of sites coming forward for new housing. 68-72 West Street, Rochford is identified as a high probability site but we note that it has been subject to 7 refusals of planning permission/conservation consent. There is a significant gap between the urban capacity identified as being suitable by the Council and the capacity applied for by the owners. Given its alternate use value, it is debateable whether the two capacity figures can be reconciled. No 247 London Road is another example of a site allocated in the Local Plan but which hasn't come forward. This is now the subject of a proposal for a care home and if approved would further limit the scope for market/affordable housing capacity on the site. A striking example of how the urban capacity study has underestimated is also evidence by 2-4 Alderman's Hill, Hockley - described as a disused service station. There has been no residential development application on this site since 2004 and most recent applications have sought commercial use of the site. Rather than being evidence of housing land deliverability, this particular site evidences the need for commercial uses in the area. There are therefore deliverability doubts over these 'high probability' categories which amount to some 40 units.

3. In relation to the assessment in the UCS entitled 'intensification of existing residential uses' we note that the assessment is premised on an assessment of recent trends taking into account net completions between 2001-2006 and 2005-06. This is effectively an assessment of windfall trends and not an approach that PPS3 encourages. Importantly Table 3-12 in the urban capacity study seeks to project forward urban capacity from residential redevelopment - a period that benefited from high house prices and PPG3 guidance encouraging redevelopment. These two circumstances have markedly changed and so the assumptions and conclusions drawn would also have changed. Even taking into account the UCS discounting, the reliability of the 404 units from this source must be questioned and in our view the 1301 figure cannot be a sound basis for urban capacity and further Greenfield releases are necessary.

4. In the section of the UCS entitled 'subdivision of dwellings' and 'living above the shop' it is estimated that recent trends would result in 7 and 15 units. Our concerns with using trends as a basis for urban capacity are detailed above - PPS3 does not encourage this. Rather, local authorities are charged with surveying their areas, identifying which areas may yield urban capacity and how much and developing policies to achieve that. Government guidance does not encourage the estimation of windfalls in the way the UCS does.

5. Redevelopment of established employment land is a separate section within the UCS. At 1 above we identify the low probability of the Main Road residential allocation coming forward. This remaining section of the UCS considers 11 further employment sites which were first identified in the 2000 UCS. Three of these are considered to have a high probability of coming forward. We have looked at these three sites and can find no evidence that they are likely to come forward. In the 8 years between 2000 and 2008 the three identified high probability employment sites have not been developed and there is no reason to assume that the next 5-10 years will be any different. For example the Rawreth Industrial Estate is identified as being well used in the UCS and although it has some unneighbourly uses there is no indication that the site is available, suitable or deliverable for residential. Land between 39-69 Lower Lambricks, Rayleigh is identified as having a high probability of residential uses. Yet there is no

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evidence of any pre-application advice or planning applications for this area. Stambridge Mills, Mill Lane, Stambridge is a further example. This site is separated from the urban area, in a flood risk zone and protected in the 2006 Replacement Local Plan by Policy EB9 which promotes B1 uses. Against this background there is only two relevant planning applications affecting this area both date from the early 1990's and relate to a plant room and loading bay. There is no evidence that this is likely to come forward for residential purposes in the next 5-10 years.

6. In the UCS extant permissions are identified as 856 dwellings. It is important to note that this figure needs to be continually reassessed so that from the point of adoption of the Core Strategy a 5 and 10 year housing land supply is available. The SHLAA notes extant permissions for 2009-14 being 106. As noted below extant permissions do not necessarily translate into deliverable sites. There is therefore a contingency that needs to be built in. Further allocations on greenfield land need to be increased and as such the quantum of housing in the area south of Hockley/Hawkwell should be increased to 330 dwellings in order to begin to meet the shortfall identified.

The District Council's 5 year housing supply assessment

7. The District Council's Annual Monitoring Report ("AMR") 2008 purports to demonstrate a 5 year housing land supply. The preamble to Table 4.10 in the AMR 2008 explains that Rochford District Council ("RDC") has included units under construction, units with full permission, units with outline permission, units with a resolution to grant, units subject to preapplication discussion/Urban Capacity Assessment and land allocations in its trajectory. The reader is referred to Appendix B which breaks down the sites in more detail. The recently published SHLAA also includes a table showing a potential 1273 dwellings deliverable. However, it refers to "appropriate brownfield sites." Since these 'appropriate sites' are do not benefit from an application or a planning permission it is difficult to programme them into the housing delivery trajectory.

8. In the full planning permission category of the AMR 2008 where work has not yet started there can be no guarantee that all these sites will be delivered in the 5 years. This comment relates to the one above in relation to the recently published SHLAA. It is not uncommon for permissions to be obtained to provide a means for valuing a site where the owner has no immediate plans to sell the site or develop housing. Delivery may also be hampered by funding constraints, or site assembly problems (where sites are in an alternative use or relocation constraints). Appendix B of the AMR 2008 does not set out the intentions of the landowner or whether the sites are truly achievable in the 5 year period as per PPS3 requirements. The SHLAA purports to show developer intentions at Appendix C but the assessment by the local authority into the legitimacy of some of the claims is not presented. The evidence base is not as full as it should be to demonstrate the robustness of Table 4.6 of the SCS. It is also unclear the extent to which this table is based on either the UCS 2007, AMR 2008, SHLAA 2009 or a combination of all three. This should be set out clearly.

9. In addition, to the 'non delivery' of a proportion of new homes in the AMR 2008, there is concern at the timings of delivery in that data set, for example, 10 units in 2008-2009 relates to outline planning permissions and it is doubtful whether reserved matters can be turned round quick enough to begin delivering housing in this year period. There could well be examples in that set of data where the delivery of units in the first year of the 5 is unlikely, thus delivery is reduced for that period and pushed back and this process is then compounded throughout the data set up to and beyond year 5. Statistical evidence from the Department of Communities and Local Government ("CLG") reveals that building starts are 43% down on the quarter to March 2009 compared with March 2008. It is not clear whether the recently published SHLAA has taken this into account and unless it does the data in the Table at 4.6 of the SCS cannot be relied upon, particularly given the current recessionary circumstances. In relation to the Table at Paragraph 4.6 a refinement is therefore needed to take into account this effect on phasing.

10. This problem is compounded for other units relied upon where permission has been granted but no start on site has been made; this accounts for a considerable number of sites in 2009-10 period (100 dwellings) which is (year 2 of the 5 year period). A delay in these will require more Greenfield sites to be identified in order to meet the shortfall.

11. Finally we note that the East of England Plan expresses its land supply requirement as a minimum. This strategy is not reflected in the

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Submission version of the Core Strategy policy H2.

12. In summary since neither the UCS nor the Annual Monitoring Report form a SHLAA, reservations are maintained about the degree to which sufficient housing land has been identified.

Policy H3

In the Preferred Options Core Strategy 2008 more locations were identified for housing growth in the post 2021 phase. Whilst it is our view that land south of Hockley/Hawkwell should benefit from a greater number of dwellings than the 175 currently identified (330) in order to make the strategy effective. We are concerned at the significant change in strategy between the Preferred Option Core Strategy and the Submission version, which has significantly less housing growth on green field sites. This change in strategy is so significant that we would question whether it is appropriate in the context of soundness and the consultation processes that have taken place so far.

We also have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with other policies in the SCS and feel that Green Belt review should be more explicit throughout the SCS. As it currently stands there is a potential conflict with national policies and limited justification for the Green belt strategy. We note that in Policy H3, which indicates the need for Green Belt land review, the advice is limited and unclear. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H3 and Policy GB1/H2 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary. Not to do so is unsound for justification and effectiveness reasons.

Policy H4 - Affordable Housing

As currently drafted we feel that the policy is not concise enough and that the policy does not reflect current guidance. The phrase 'at least' would indicate that in most cases affordable housing above 35% will be sought. Our understanding is that the 35% figure is recommended in the SHMA and that to provide a policy framework which seeks to go beyond that figure would potentially be unworkable as many sites could not financially bare the burden of over a third of the net developable area not yielding a value. The policy should be redrafted so that "a target of 35% affordable housing shall be provided on all developments of 15 or more units..."

The last policy paragraph provides some scope to relax this policy, if there are clear site constraints that make on site provision impossible. The policy, though, is not particularly clear on what would constitute exceptional circumstances. For example, physical site constraints, which unusually raise development costs, would be one such reason and this should be specified. There may be other reasons including the nature of housing needs in the part of the District the site is located which justify affordable housing below the 35% target. Design reasons may also have a bearing on how provision is made and in what form, particularly if the site is in an historic area where design might override housing need argument. It is therefore recommended that the policy expand on the type of circumstances where affordable housing may be relaxed and the type of information that will be sought of applicant's who have a need to invoke this part of the policy.

Policy H5

In support of the policy, it is advantageous that no percentages requiring a specific mix are included. This flexibility will enable developers and the Council to respond directly to changing circumstances in the local housing market. In the past some authorities have set out a percentage for the type of housing they require only to find that after a few years of strict implementation there is an oversupply of property of that type and no flexibility in the policy to address the problem.

Policy ED2 - London Southend Airport

It is considered that to grow non aviation related employment at a location north of Southend Airport where sustainable access from the rest of Rochford District requires careful consideration. Most Airports are serviced by aviation related employment development and as such a location close to the airport is sensible and sustainable. However, for surface access reasons it would be inappropriate to encourage travel from Rochford's main settlements to what essentially

Core Strategy Submission Document

16930 Object

CHAPTER 8 Policy ENV9 - Code for Sustainable Homes

would be a rural location for general employment uses. Whilst sustainable access would be improved by a railway station and better bus links, there is no evidence to suggest that a sustainable surface access strategy for non related employment development at the Airport can be achieved. Paragraph 11.22 explains the critical importance of a railway station to the delivery of the strategy yet the Transport Chapter and Implementation Chapter provide neither a policy nor an assessment of deliverability. It is also notable that the South Essex Rapid Transit Policy T4, as set out at paragraph 10.16, notes that Rochford is not proposed to be served but may be served in future phases. This uncertainty is no way to plan for a major employment land supply strategy in the District. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley/Hawkwell, Rochford and Rayleigh is unsound.

Policy ED3

We fully support the first sentence of the Policy and note the apparent contradiction with the statements in Policy H1 and elsewhere which seeks to develop on alternative uses at industrial estates such as Eldon Way.

This contradiction is evidence in the second paragraph of Policy ED3. In our representations on Policy H1 we have explained why it is not sound to diminish the employment stock at Eldon Way and the importance of maintaining a dominance of employment type uses at this estate. These arguments are not repeated here.

We note the sentiments of the third paragraph and in accordance with our representations elsewhere are of the view that this sentence should be revised to explain that Eldon Way will accommodate principally employment type uses. As noted elsewhere uses which are an alternative to employment would diminish this highly sustainable employment site and this is unsound when assessed against National Policy.

Policy ED4 - Future Employment Allocations

In part, the de-allocation strategy is not supported as it is considered unsound when set against sustainability criteria. In relation to the Eldon Way Industrial Estate it is considered critical to the ongoing sustainability of this settlement that employment uses are maintained at this location. It is close to the railway station, bus routes and local residential areas from which the opportunity exists for employees to walk or cycle to work. Its location adjacent to the Town Centre offers opportunity for some retail and leisure development to complement the centre and to maintain a supporting function. These sustainable benefits would not occur with the deallocation of Eldon Way or the significant erosion of its employment floorspace. Whilst redevelopment of the employment site to achieve new employment is supported, the dominant land use should continue to be employment use. As a consequence, the 18ha of land required for employment in this policy is considered to be excessive and the policy should be reviewed to explain that redevelopment of existing employment sites for primarily new employment development will be encouraged.

Policy T4

It is noted that the South Essex Rapid Transit policy, as elaborated upon at paragraph 10.16 notes that Rochford is not served but may be served in future phases. This uncertainty is contrary to the delivery principles of soundness and directly puts at issue the employment land supply strategy in the District which is founded on sustainable access to new sites. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley, Rochford and Rayleigh is unsound.

Appendix H1, CTL1 - Infrastructure

It is recognised that necessary infrastructure provision is an important part of creating a sustainable development and in that context appendix H1 is supported. The supporting text notes that the table at Appendix H1 is not exhaustive and in that context it is very important that the framework properly distinguishes between what should be provided as part of new development schemes and what shouldn't. It is therefore essential that the framework acknowledges the importance of Circular 05/05 and the tests which say that provision of infrastructure and/or contributions should be:

- * Relevant to planning
- * Necessary to make the proposed development acceptable in planning terms
- * Directly related to the proposed development
- * Fairly and reasonably related in scale and kind to the proposed development
- * Reasonable in all other respects

As is made clear (Paragraph B9 of Circular 5/05) contributions should not be used to make good existing deficiencies in infrastructure provision. Nor are they to be used to secure contributions to the achievement of wider planning objectives that are not necessary for consent to be granted. In that context the Core Strategy should set this out as its policy framework.

Policy GB1 - Green Belt

Core Strategy Submission Document

16930 Object

CHAPTER 8 Policy ENV9 - Code for Sustainable Homes

The objectives of this policy are supported, although as noted in other representations the SCS is unsound as it does not meet the tests in relation to justification, compliance with national policy or effectiveness of strategy.

Policy GB1 mentions the objective to allocate the minimum amount of Green Belt land necessary. The policy should link to the requirements of PPG2 and RSS which are discussed in relation to the representations on Policy H2 and H3. The policy should set out a timeframe for the review and why Rochford requires a Green Belt review (what the exceptional circumstances are in this District that justify a review of local boundaries. The policy should be amended to set out a 2031 time frame and this may require the SCS to have an extended life span beyond 2021.

We would recommend the deletion of the word character since Green Belt designation is not related to landscape character as currently drafted. For clarity we would also recommend that the Policy or its supporting text explain that a Green Belt review will take place in support of an allocations document (paragraph 6.6) in order to identify an appropriate new boundary. This is particularly necessary given the commitment to a Green belt review in the adopted Local Development Scheme.

Policy CLT1 - Planning Obligations and Standard Charges

In view of the need to test fully the basis on which standard charges are based it is important that any document produced is in a development plan document that enables an examination in public. The policy should explain this in order that when the document is produced it accords with Policy and is based on sound evidence.

ENV9 - Code for Sustainable Homes

Object. The advice from the Department of Communities and Local Government is that the new requirement to have a rating against the Code does not make it mandatory to build a Code home or to have each new home assessed against the Code. It does however mean that all buyers of new homes be given clear information about the sustainability of the new home. A house builder can do this in one of two ways:

- they can choose to build a Code home, have that home assessed against the Code and provide the home buyer with a Code certificate stating the star rating the home has achieved
- or, they can choose to build to current building regulations standards, not to pay for an assessment and instead download a nil-rated certificate of non-assessment (also referred to as a nil-rating) to provide to the home buyer.

As such the Rochford policy requirement that coding 3 be achieved by 2010 and Code 6 by 2013 is out of step with Government advice. The policy wording should explain that it is just the coding that is a requirement of new homes and not necessarily that new homes should be constructed to achieve a standard.

The current Government objectives are for the code to be introduced over a reasonable period with development to be code 3 by 2010, code level 4 by 2013 and code level 5 by 2016. In this regard the policy, as drafted, seeks to achieve code 6 by 2013 and consequently compresses the code requirements into a shorter time scale with the costs associated expected to be subsumed within the housing market through higher prices. This is not a realistic strategy for the delivery of sustainable homes and we consider that the policy should be revised to extend the period of compliance but to also make it more flexible based on local circumstances.

Research undertaken on behalf of the Housing Corporation and English Partnerships, published in February 2007 'A cost review of the code for sustainable homes' reveals that code 6 is unlikely to be unattainable given existing technologies and that achieving code 5 could result in a 12% to 20% increase in costs that would have to be passed onto the consumer. Given the variability of the housing market with peaks and troughs, it is unlikely that the housing market would be able to subsume this level of price increase.

The code system policy as currently drafted does not have regard to site circumstances and so many of the requirements could be difficult to meet. For example, micro electricity generation on site may be difficult to achieve where local circumstances deter the capture of wind or solar power. If more expensive technologies are required to generate power than is the norm then costs will rise. There may be other competing reasons why designs cannot include certain sustainability measures if housing sites are in sensitive landscape and historic locations. Alternatively there may be significant development costs associated with site specific circumstances and so viability of the site's development becomes a valid consideration. By insisting on the code for sustainable homes other policy objectives such as affordable housing at particular rates and other contributions may need to be reconsidered. Consequently, we are of the view that this policy should be drafted in a manner which enables site specific circumstances to be taken into account. As noted above the Government explains that the code is a certification requirement and does not necessarily mean that buildings are constructed in accordance with a code level.

It is also important to note that it is not the purpose of planning legislation to duplicate other legislation. In this regard, the policy should accept that the Building Regulations will be the main vehicle for implementing this policy and that unless the coding requires external development then there will be no need to specify what is to be carried out in a planning application.

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16930 Object

CHAPTER 8 Policy ENV9 - Code for Sustainable Homes

Summary: ENV9 - Code for Sustainable Homes

Object. The advice from the Department of Communities and Local Government is that the new requirement to have a rating against the Code does not make it mandatory to build a Code home or to have each new home assessed against the Code. It does however mean that all buyers of new homes be given clear information about the sustainability of the new home. A house builder can do this in one of two ways:

- they can chose to build a Code home, have that home assessed against the Code and provide the home buyer with a Code certificate stating the star rating the home has achieved
- or, they can chose to build to current building regulations standards, not to pay for an assessment and instead download a nil-rated certificate of non-assessment (also referred to as a nil-rating) to provide to the home buyer.

As such the Rochford policy requirement that coding 3 be achieved by 2010 and Code 6 by 2013 is out of step with Government advice. The policy wording should explain that it is just the coding that is a requirement of new homes and not necessarily that new homes should be constructed to achieve a standard.

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The code system policy as currently drafted does not have regard to site circumstances and so many of the requirements could be difficult to meet. For example, micro electricity generation on site may be difficult to achieve where local circumstances deter the capture of wind or solar power. If more expensive technologies are required to generate power than is the norm then costs will rise. There may be other competing reasons why designs cannot include certain sustainability measures if housing sites are in sensitive landscape and historic locations. Alternatively there may be significant development costs associated with site specific circumstances and so viability of the site's development becomes a valid consideration. By insisting on the code for sustainable homes other policy objectives such as affordable housing at particular rates and other contributions may need to be reconsidered. Consequently, we are of the view that this policy should be drafted in a manner which enables site specific circumstances to be taken into account. As noted above the Government explains that the code is a certification requirement and does not necessarily mean that buildings are constructed in accordance with a code level.

It is also important to note that it is not the purpose of planning legislation to duplicate other legislation. In this regard, the policy should accept that the Building Regulations will be the main vehicle for implementing this policy and that unless the coding requires external development then there will be no need to specify what is to be carried out in a planning application.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** iii

Core Strategy Submission Document

O - 16244 - 8650 - Policy ENV10 - BREEAM - i, ii, iii

16244 Object

CHAPTER 8 Policy ENV10 - BREEAM

Respondent: Countryside Properties (Southern) Ltd (Mr Steve Price) [8650] **Agent:** N/A

Countryside Properties (Southern) Ltd
Countryside House
The Drive
Brentwood
Essex
CM13 3AT
01277260000

Full Text: Careful consideration needs to be given to accelerating the Code for Sustainable Homes (CSH) and BREEAM standards in advance of adopted policy. CSH is not a mandatory requirement and only the energy criteria (i.e. 25%) will become regulation through Building Regulations Part L from 2010 and further improvements at specified milestones thereafter.

In 'Building a Greener Future Policy' reference is made to building performance and local authorities would need to have regard to a number of considerations, including whether the proposed approach is consistent with securing the expected supply and pace of housing development shown in the housing trajectory required by Planning Policy Statement 3. Indeed, further consistent references are also referenced in PPS 1.

It goes on to state that national standards for reducing carbon emissions from homes should be set through building regulations, supported through the planning system. Indeed, given the level of ambition built into the national framework, CLG believe it would make it harder for industry to invest in supply chains with confidence or get the economies of scale to make new technologies cost effective. "It would also jeopardise our parallel commitment to increase the level of house building and deliver the affordable homes the country needs".

Given, these drivers it is considered that if levels for CSH and BREEAM are stipulated they are subject to review against national policy and importantly viability tests. Furthermore, the 'Core Strategy' would benefit from reflecting on the publication of the 'Definition of Zero Carbon Homes and Non-domestic Buildings' policy, and the soon to be published 2010 Code for Sustainable Homes consultation paper, and in addition the UK-GBC Consultation on a Code for Sustainable Buildings.

With regard to water conservation aspects, the setting of water standards through CSH is fraught with risks, for example the Approved Document G of the building regulations, 'Sanitation, Hot Water Safety and Water Efficiency' was published in May and was to take effect from October 2009; however this has now been put back to April 2010. The reason behind this is because under the Technical Standards Directive (98/34/EC), notification to the European Commission of the guidance contained in the draft Approved Document G was required.

Consequently on the 3rd September a "detailed opinion" was received from the Commission with a number of comments on the draft Approved Document. This resulted in a '3 month standstill' which prohibits introduction of the Approved Document before 2 December 2009. Accordingly, CLG have decided to delay its issue until 6 April 2010.

With regard to surface water run-off, category SUR1 of CSH is now subject to similar review by CLG Technical Advisory Group, because it has been found to be unreasonable in its intent and will result in significant technical problems and additional costs compared with current regulations.

Moreover, PPS 25 must be treated with caution as its interpretation is subject to variable outcomes at the sub-regionally level. For example, we support the principles of SuDs; however Highways Departments very often will not accept or adopt such measures.

Summary:

If levels for CSH and BREEAM are to be stipulated within the Core Strategy, wording must be inserted which states that levels/requirements are subject to review against national policy and, importantly, viability tests at the appropriate time.

Alternatively, no minimum target should be set within the Core Strategy, but words be inserted which state that the minimum levels/requirements will be set for an individual developments when the detailed scale and nature of a development scheme is known or defined (e.g. within a Design Brief or Master Plan, Concept Statement or Planning Application for a site).

Change to Plan

If levels for CSH and BREEAM are to be stipulated within the Core Strategy, wording must be inserted which states that levels/requirements are subject to review against national policy and, importantly, viability tests at the appropriate time.

Alternatively, no minimum target should be set, but words be inserted which state that the minimum levels/requirements will be set for an individual developments when the detailed scale and nature of a development scheme is known or defined (e.g. within a Design Brief or Master Plan, Concept Statement or Planning Application for a site) and will be set in accordance with national building regulations or other national policy at the time unless viability tests indicate that such levels/requirements would not be appropriate/would make a scheme unviable.

Core Strategy Submission Document

O - 16244 - 8650 - Policy ENV10 - BREEAM - i, ii, iii

16244 Object

CHAPTER 8 Policy ENV10 - BREEAM

Appear at exam? Yes

Soundness Tests i, ii, iii

Core Strategy Submission Document

S - 16857 - 9889 - Policy ENV10 - BREEAM - None

16857 Support

CHAPTER 8 Policy ENV10 - BREEAM

Respondent: Environment Agency (Miss Carrie Williams) [9889] **Agent:** N/A

Environment Agency
Iceni House
Cobham Road
Ipswich
Suffolk
IP3 9JD
United Kingdom
01473 706007

Full Text: We support the inclusion of this policy because it will also go some way to address the issues of water efficiency highlighted in the "Essex Thames Gateway Water Cycle Study Scoping Study" (March 2009).

Summary: We support the inclusion of this policy because it will also go some way to address the issues of water efficiency highlighted in the "Essex Thames Gateway Water Cycle Study Scoping Study" (March 2009).

Change to Plan N/A

Appear at exam? No **Soundness Tests** N/A

Core Strategy Submission Document

S - 15953 - 10849 - Community Infrastructure, Leisure and Tourism - None

15953 Support

CHAPTER 9 Community Infrastructure, Leisure and Tourism

Respondent: Canewdon Parish Council (Mrs Kelly Holland) **Agent:** N/A
[10849]

Canewdon Parish Council
33 Rowan Way
Canewdon
Essex
SS4 3PD

Full Text: Canewdon Parish Council are concerned regarding the infrastructure - roads, lack of public transport, water, sewerage, school places at the village school.

Transport to secondary schools needs to be considered & need to question the policy regarding catchment areas for students in the village who are transferring to secondary education.

Summary: Canewdon Parish Council are concerned regarding the infrastructure - roads, lack of public transport, water, sewerage, school places at the village school.

Transport to secondary schools needs to be considered & need to question the policy regarding catchment areas for students in the village who are transferring to secondary education.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16340 - 9052 - Introduction, 9.1 - i

16340 Object

CHAPTER 9 Introduction, 9.1

Respondent: mr Robert Alps [9052]

33, Hawkwell Chase,
Hockley,
Essex.
SS5 4NH
England
01702 205204

Agent: N/A

Full Text: Objection to Rochford Core Strategy, 175 houses in Hawkwell

Dear sirs, We wish to make plain our objections to the above strategy. The proposal is completely unsound. The infrastructure is not in place to meet the additional traffic that will have to use an already over loaded road. ie the B1013 .We cannot see an economical solution to this problem other than a new main road built, North of the village starting at the A130 running through to Thorpe Bay .Obviously this would cost millions of pounds and therefore could never happen. To keep loading an overcrowded main road running from Rayleigh to Rochford,with Hawkwell stuck in the in middle is madness.Not to mention the effect it would have on Rectory Road and Thorpe Road.Surely,as planners you can see this . Also, the schools and the Doctors facilities are not good enough already. Furthermore,I have lived in the Hockley/Hawkwell area for 45 years and do not want it turned into a town rather than the village that it is struggling to remain now.We cannot afford to lose these green belt areas and the wildlife.. Please lodge my objections

Summary:

The infrastructure is not in place to meet the additional traffic that will have to use an already over loaded road. ie the B1013 .We cannot see an economical solution to this problem other than a new main road built, North of the village starting at the A130 running through to Thorpe Bay .Obviously this would cost millions of pounds and therefore could never happen. To keep loading an overcrowded main road running from Rayleigh to Rochford,with Hawkwell stuck in the in middle is madness.Not to mention the effect it would have on Rectory Road and Thorpe Road.Surely,as planners you can see this . Also, the schools and the Doctors facilities are not good enough already. Furthermore,I have lived in the Hockley/Hawkwell area for 45 years and do not want it turned into a town rather than the village that it is struggling to remain now.We cannot afford to lose these green belt areas and the wildlife

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 15924 - 9936 - Policy CLT1 - Planning Obligations and Standard Charges - i, iii

15924 Object

CHAPTER 9 Policy CLT1 - Planning Obligations and Standard Charges

Respondent: Mr David Grew [9936]

PO Box 2091
Hockley
Essex
SS5 4WR
UK
07740201389

Agent: Mr David Grew [9936]

PO Box 2091
Hockley
Essex
SS5 4WR
UK
07740201389

Full Text: Taking into account the affordable housing provision, it is difficult to see how it would be viable for developers to also fund substantial infrastructure improvement. In addition, the piecemeal nature of the location of proposed sites for housing will lead to very limited improvements in infrastructure until all sites have been developed. The longevity of this process could lead to enlarged communities and no improvement in infrastructure.

Summary: Taking into account the affordable housing provision, it is difficult to see how it would be viable for developers to also fund substantial infrastructure improvement. In addition, the piecemeal nature of the location of proposed sites for housing will lead to very limited improvements in infrastructure until all sites have been developed. The longevity of this process could lead to enlarged communities and no improvement in infrastructure.

Change to Plan Housing should be sited in sustainable locations where any contributions could be used far more efficiently and effectively.

Appear at exam? No

Soundness Tests i, iii

Core Strategy Submission Document

S - 15991 - 13441 - Policy CLT1 - Planning Obligations and Standard Charges - None

15991 Support

CHAPTER 9 Policy CLT1 - Planning Obligations and Standard Charges

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: Brevity would assist clarity. Explanatory text need not be a component of the policy itself.

Summary: Brevity would assist clarity. Explanatory text need not be a component of the policy itself.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16049 - 14107 - Policy CLT1 - Planning Obligations and Standard Charges - None

16049 Support

CHAPTER 9 Policy CLT1 - Planning Obligations and Standard Charges

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: We have concerns that Section 106 Agreements do not materialise. In line with council policies, these need to be more transparent.

Summary: We have concerns that Section 106 Agreements do not materialise. In line with council policies, these need to be more transparent.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16093 - 7336 - Policy CLT1 - Planning Obligations and Standard Charges - i

16093 Object

CHAPTER 9 Policy CLT1 - Planning Obligations and Standard Charges

Respondent: Rayleigh Town Council (Mrs K Cumberland) [7336] **Agent:** N/A

Rayleigh Town Council
The Pavilion
King George V Playing Field
Bull Lane
Rayleigh
Essex
SS6 8JD

01268 741880

Full Text: Policy CLT1 It has been estimated that approximately £1billion will be needed to make up the shortfall in infrastructure. It is unrealistic to expect this to be made up by "standard charges" (as much as £300,000 per dwelling across the total number of dwellings proposed). On this basis this policy is unsound unless it includes a requirement that these plans are unsustainable without considerable Government funding.

Summary: Policy CLT1 It has been estimated that approximately £1billion will be needed to make up the shortfall in infrastructure. It is unrealistic to expect this to be made up by "standard charges" (as much as £300,000 per dwelling across the total number of dwellings proposed). On this basis this policy is unsound unless it includes a requirement that these plans are unsustainable without considerable Government funding.

Change to Plan see above

Appear at exam? No **Soundness Tests** i

Core Strategy Submission Document

S - 16233 - 8650 - Policy CLT1 - Planning Obligations and Standard Charges - None

16233 Support

CHAPTER 9 Policy CLT1 - Planning Obligations and Standard Charges

Respondent: Countryside Properties (Southern) Ltd (Mr Steve Price) [8650] **Agent:** N/A

Countryside Properties (Southern) Ltd
Countryside House
The Drive
Brentwood
Essex
CM13 3AT
01277260000

Full Text: Circular 5/05 and the emerging/published DCLG guidance on the use of CIL, makes it clear that new developments/contributions from new development can not be used to resolve existing deficiencies, only, proportionally, those deficiencies made worse by the impact of new development. This should be made clear in the supporting text for this Policy.

Summary: Circular 5/05 and the emerging/published DCLG guidance on the use of CIL, makes it clear that new developments/contributions from new development can not be used to resolve existing deficiencies, only, proportionally, those deficiencies made worse by the impact of new development. This should be made clear in the supporting text for this Policy.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

16257 Object

CHAPTER 9 Policy CLT1 - Planning Obligations and Standard Charges

Respondent: Colonnade Land LLP [9177]

Colonnade Land LLP
Fifth Floor
17-19 Maddox Street
London
W15 2QH
020 7255 7490

Agent: Icen Projects Limited (David Churchill) [10057]

Icen Projects Limited
83 Victoria Street
London
SJ1H 0HW

Full Text: ROCHFORD DISTRICT COUNCIL - LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY SUBMISSION
SEPTEMBER 2009

Icen Projects Ltd (Icen) has been instructed by Colonnade Land LLP (Colonnade) to submit representations to the Rochford Local Development Framework Core Strategy Submission (CSS).

a) Overview

It is our conclusion that the CSS is not justified, effective or consistent with national policy, as required by Planning Policy Statement 12: Creating Strong Safe and Prosperous Communities through Local Spatial Planning (PPS12) and is therefore vulnerable to being found unsound by an Inspector through the Examination in Public.

b) Background and Summary

These representations follow those made by Icen on behalf of Colonnade to the Preferred Options Core Strategy, submitted via letter dated 17 December 2008. In this regard, we would request that the Council confirms that the representations made to the Preferred Options Core Strategy will be taken into account alongside the current representations, particularly as there are a number of cross references between the two sets of representations.

It is not considered necessary to reiterate the content of the previous representations, as they were made at the appropriate stage and will be considered by the Planning Inspectorate in due course, but it is inevitable that certain elements will require restating where it is not clear that they have been taken into account in the production of the CSS. For clarity, therefore, Colonnade feel that it is appropriate to clarify the 'in-principle' issues that were raised in the representations to the Preferred Options Core Strategy, recognising that these issues were raised in the context of a wider and more coherent justification made within the representations:

- â€¢ Further cross-referencing of the recommendations made within the evidence base is required;
- â€¢ Greater focus should be placed on promoting Rochford as the principal settlement within the District;
- â€¢ Coombes Farm is the most logical location for residential development abutting the urban area of Rochford and as such warrants recognition as a general location for residential development;
- â€¢ The allocation of Three Ashes Farm for employment generating uses will be pursued;
- â€¢ Recognition that it is not realistic to expect residential allocations to be met mainly on Brownfield sites, nor should the intensification of smaller sites in residential areas be pursued;
- â€¢ Many of the sites identified as suitable for residential development will not be viable and will not come forward for development within the timescales anticipated;
- â€¢ The failure to provide the necessary justification for the proposed infrastructure improvements sought in Appendix H1;
- â€¢ The inclusion of an affordable housing exception policy was sought; and
- â€¢ The need to identify sites capable of delivering employment growth in the short term.

Following assessment of the CSS presented by the Council for consultation prior to submission to the Secretary of State, Colonnade considers the Plan to be 'unsound' as the document consistently fails to meet the tests of soundness set out in the table following Paragraph 4.52 of PPS12. For clarity, PPS12 confirms that to be 'sound' a Core Strategy should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY and defines 'justified' as "founded on a robust and credible evidence base" and "the most appropriate strategy when considered against the reasonable alternatives" and 'effective' as "deliverable", "flexible" and "able to be monitored".

The rationale for the above is identified in the remainder of these representations, which are provided in the interests of ensuring the Council delivers a strong, robust and logical Core Strategy that guides the future development of the District in a justified and effective manner.

b) Colonnade

As the Council is aware from previous submissions to the Local Development Framework, Colonnade is a strategic land company with a particular interest in the future development of the District as a consequence of a number of sites that it controls, particularly around Rochford.

The Council will also be aware that Colonnade has recently submitted an outline planning application for the residential development of the land at Coombes Farm, Rochford to provide a sustainable urban extension comprising up to 326

Core Strategy Submission Document

16257 Object

CHAPTER 9 Policy CLT1 - Planning Obligations and Standard Charges

residential dwellings, with associated accesses and community uses. Whilst the planning application process is clearly separate from the Local Development Framework production process, Colonnade wishes to continue the promotion of the site as a suitable location for residential development.

Accordingly, these representations focus on the legal requirements and tests of soundness associated principally with the Housing and Employment chapters of the CSS, with reference where appropriate to the sites that are controlled by Colonnade, the outline planning application at Coombes Farm and other issues where relevant.

c) Housing

i. Date of Adoption

The CSS assumes an adoption date of 2010 and plans for the provision of housing to 2025.

Taking account of the potential delays to the adoption of the Plan, including the Examination process, it would be more appropriate for the CSS to provide sufficient flexibility to allow for delays in its adoption. Colonnade considers an adoption date of 2011 for the CSS is a more realistic target.

Taking account of the advice in Paragraph 4.13 of PPS12, which states that the time horizon for the Core Strategy should be "at least 15 years from the date of adoption" it would be appropriate for the CSS to plan for the provision of housing to 2026 at the earliest. As such, Colonnade does not consider the CSS to be 'flexible' in the context of the tests of soundness in the table following Paragraph 4.52 of PPS12.

ii. Housing Delivery

However, setting the above aside, the Housing Chapter identifies the minimum housing delivery target for the period 2001 to 2021 of 4,600 dwellings as set out in the East of England Plan, with the annual average requirement of 250 dwellings per annum to extend provision from 2021 to 2025. It also confirms that the residual target for the period 2006 to 2021 is 3,790 dwellings, taking account of the delivery of 810 dwellings in the period 2001 to 2006, and a further 618 dwellings have been completed between 2006 and 2008.

This leaves a residual housing provision target of a minimum of 3,172 dwellings in the period 2008 to 2021. Taking into account the required provision beyond 2021, the residual housing provision target in the period 2008 to 2025 is a minimum of 4,172 dwellings. The disparity between these figures and those provided within the CSS are explained by the rounding down of the annual average delivery requirement in the period 2006 to 2021 to 250 dwellings per annum, compared with the actual figure of 252.67.

The table at Paragraph 4.6 of the CSS identifies the source of housing provision that will meet the identified minimum requirements and includes figures for 'Extant Planning Permissions' and 'Existing allocations/other appropriate sites identified in Strategic Housing Land Availability Assessment'. These figures, along with the actual completions within the period are combined to produce the figure for the 'Total without Green Belt release' figure.

Setting aside the concern regarding under-provision associated with the rounding down of the annual average delivery requirement in the period 2006 to 2021, the CSS fails to identify the sites that will contribute to the 'Extant Planning Permissions' provision. The identification of the sites that will contribute to the 'Extant Planning Permissions' should be provided in the context of the findings of the Inspector in the appeal by Asprey Homes [APP/G5180/A/07/2043219/NWF] who determined that the reliance on a delivery rate of 100% is unsafe [IR287].

Furthermore, at the time of writing these representations, the Strategic Housing Land Availability Assessment 2009 has not been published. It is impossible therefore for a full assessment of the proposed housing provision to be undertaken to confirm whether the CSS is 'founded on a robust and credible evidence base' [test of soundness in the table following Paragraph 4.52 of PPS12].

iii. Redevelopment of Employment Sites

Paragraph 4.14 of the CSS refers to the identification of the four employment sites that are considered by the Council to be suitable for redevelopment to residential use. However, the failure to publish the Strategic Housing Land Availability Assessment 2009 either before or alongside the publication of the CSS means that the assumptions made by the Council as to the suitability, availability, viability and deliverability of the sites cannot be assessed.

It has been necessary, therefore, to review the assumptions made in the Rochford Urban Capacity Study 2007 (UCS) regarding the sites. Within the section of the UCS entitled 'Redevelopment of Established Employment Land' [pages 22 & 23] includes a list of those sites assessed, their indicative capacities and the probability of residential development coming forward at the sites within the plan period (identified elsewhere as 2001 - 2021). The list includes the four sites identified in the CSS of Eldon Way/Foundry Estate, Hockley; Rawreth Lane Industrial Estate, Rayleigh; Stambridge Mills; and Star Lane Industrial Estate, Great Wakering.

In total, the UCS identifies an indicative residential redevelopment capacity of 486 units on the four sites (118, 220, 60 and 88 respectively). Of these, it identifies the Rawreth Lane Industrial Estate and Stambridge Mills as having a 'high'

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probability of coming forward for development in the Plan period (2001 - 2021), which would deliver 280 residential dwellings using the Council's own figures. The Star Lane Industrial Estate (referred to in the UCS as the Star Lane Brickworks) is identified as having a 'medium' probability of coming forward for development in the Plan period, with capacity to deliver 88 residential dwellings. It is unclear, therefore, where the figure for 'Existing allocations/other appropriate sites identified in Strategic Housing Land Availability Assessment'.

Set against this is the identification of these four sites in the CSS as being capable of delivery for residential development within the Plan period, with 671 units delivered between 2006 and 2015 and a further 506 units between 2015 and 2021.

The UCS also states in the same section that:

"There are considerable areas of land in the district that are currently allocated for, and in use as, employment land. The redevelopment of such sites for residential use would reduce demand for residential development on greenfield sites, but would at the same time create a need for alternative sites to be found for employment. Such an approach, which would be likely to require the decontamination of existing employment land to make it fit for residential use, together with development of a greenfield site and implementation of additional infrastructure to serve the new employment area, may well be unsustainable." [our emphasis]

The UCS appears to confirm therefore, that not only would the redevelopment of the four sites listed in the CSS be unlikely within the Plan period, but also potentially unsustainable. In this regard, it is notable that the promoters of Stambridge Mills sought the Screening Opinion of the Council as to whether Environmental Impact Assessment of the planning application for the redevelopment of the site for residential use was required in 2007, but to date are yet to submit a planning application for the redevelopment of the site.

In light of this, Colonnade does not consider the CSS is 'the most appropriate strategy when considered against the reasonable alternatives' [test of soundness in the table following Paragraph 4.52 of PPS12], which include the provision of residential development in East Rochford.

iv. Strategic Housing Growth to the East of Rochford

Furthermore, whilst paragraph 2.62 of the CSS identifies concern relating to the identification of locations to the east of Rochford for development on the basis that 'vehicular movements would inevitably be directed through Rochford's historic core', the CSS later identifies Stambridge Mills as a suitable site for residential redevelopment.

In light of the evident conflicts between the evidence base provided in support of the CSS and the absence of other evidence, the CSS is not considered 'sound' in the context of the tests of soundness in the table following Paragraph 4.52 of PPS12.

v. Housing Trajectory

Paragraph 4.28 of the CSS confirms that policies H1, H2 and H3 of the CSS will deliver housing supply as illustrated in the Housing Trajectory at Appendix H2. This Housing Trajectory is transposed from the 2008 Annual Monitoring Report (AMR).

Whilst on the face of it, the Housing Trajectory appears to confirm that the Council can meet its requirement to identify a five year housing supply, many of the sites identified within the AMR do not conform to the guidance issued by CLG in August 2008, on the assessment of a five year land supply. The guidance identifies sites that can be included within the five year assessment of housing supply as:

"those that are allocated for housing in the Development Plan, sites that have planning permission (outline or full planning permission that has not been implemented) and specific, unallocated brownfield sites that have the potential to make a significant contribution to housing delivery during the 5 year period".

Table 4.10: Projected Net Completions of the AMR confirms that the five year housing land supply figure includes sites from 'other land allocated for residential purposes', which are based on land allocations outside existing settlements. However, it should be clarified that these land allocations are not currently allocated for housing development in an adopted Development Plan. As such, these unallocated greenfield sites that are yet to make significant progress through the planning system should be discounted and the five year housing land supply recalculated.

The table below has been prepared to confirm the extent of the shortfall should the sites from 'other land allocated for residential purposes' be removed from the calculation of the Rochford five year housing land supply, in accordance with the guidance issued by CLG:

Recalculated Five Year Housing Land Supply (2009 - 2014):

Year
1st April 2009 to 31st March 2010
Predicted Delivery (A)

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106 dwellings
Allocations on 'other land allocated for residential purposes' (B)
0
Residual delivery (A-B)
106 dwellings
Delivery Shortfall
0

Year
1st April 2010 to 31st March 2011
Predicted Delivery (A)
217 dwellings
Allocations on 'other land allocated for residential purposes' (B)
150
Residual delivery (A-B)
67 dwellings
Delivery Shortfall
150

Year
1st April 2011 to 31st March 2012
Predicted Delivery (A)
544 dwellings
Allocations on 'other land allocated for residential purposes' (B)
300
Residual delivery (A-B)
244 dwellings
Delivery Shortfall
300

Year
1st April 2012 to 31st March 2013
Predicted Delivery (A)
395 dwellings
Allocations on 'other land allocated for residential purposes' (B)
375
Residual delivery (A-B)
20 dwellings
Delivery Shortfall
375

Year
1st April 2013 to 31st March 2014
Predicted Delivery (A)
300 dwellings
Allocations on 'other land allocated for residential purposes' (B)
300
Residual delivery (A-B)
0 dwellings
Delivery Shortfall
300

TOTAL

Predicted Delivery (A)
1,562 dwellings

Allocations on 'other land allocated for residential purposes' (B)
1,125 dwellings

Residual delivery (A-B)
437 dwellings

Delivery Shortfall
1,125 dwellings

The above table confirms that the removal of the 'other land allocated for residential purposes' from the calculation of the Rochford five year housing land supply leaves the Council with a minimum net additional housing delivery of 437 dwellings, which equates to a supply of 1.7 years based on the adjusted annual delivery target of a minimum of 255 net

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additional dwellings per annum. As such, the Council is failing to meet its requirement to demonstrate a five year housing land supply in accordance with PPS3 and the supporting guidance provided by CLG. It is notable that the recent application by David Wilson Homes at Land between Main Road and Rectory Road and Clements Hall Way, Hawkwell identifies an even greater shortfall in the Council's five year housing land supply.

In addition to the above, the AMR does not include a commentary on how deliverability has been assessed against the requirements of paragraph 54 of PPS3.

Furthermore, the guidance from CLG confirms that the windfall sites cannot be relied upon in demonstrating a five year supply unless a Local Planning Authority can demonstrate genuine local circumstances exist to allow this exception. However, the second paragraph of the section entitled 'Housing Trajectory and Five Year Housing Supply' confirms that the estimated completions in the years 2008 to 2013 includes estimated yields through 'intensification' coming forward in future years. With reference to the definition of 'intensification' on page 13 of the AMR, it appears that the 'Housing Trajectory and Five Year Housing Supply' also includes provision for windfall sites. As such, the Council is required to demonstrate the 'genuine local circumstances exist to allow this exception'.

The pressures on delivery and need for additional sites are more acute when it is considered that an average delivery rate of 204 dwellings per annum was achieved during a strong period of housing market growth. In view of the current economic downturn, and significant problems faced within the housing market, the Council should seek to identify appropriate and deliverable sites to meet its regional housing target provision commitments. Suitable sites would include Coombes Farm, which has been positively promoted for development through the LDF process.

It may, therefore, be more appropriate for the Council not merely to allocate sufficient sites to meet the minimum targets set down by the East of England Plan, but to identify a reservoir of land capable of coming forward for development should the sites identified through the CSS and Allocations Development Plan Documents (DPD) fail to come forward for development within the anticipated timescales.

vi. Appendix H1

As set out in the representations to the Preferred Options Core Strategy, there is continuing concern that the list of improvements to infrastructure required in support of residential development as set out in Appendix H1 fails to provide the necessary justification for its inclusion. Whilst the preamble seeks to clarify why the infrastructure is sought, the inclusion of this list should be fully justified, otherwise it is of little value. Furthermore, it would be of benefit to provide further details of the existing community infrastructure provision and capacity within the evidence base.

The failure to provide the necessary justification for its inclusion means that the CSS will not be 'founded on a robust and credible evidence base' [test of soundness in the table following Paragraph 4.52 of PPS12].

d) Character of Place

As set out in the representations to the Preferred Options Core Strategy, Colonnade considers that, with respect to the requirement to produce and adhere to Development Briefs for large residential developments, as set out in Policy CP1, the Council should not seek to impose further demands on developers where existing regulations provide sufficient requirements regarding design. In this instance, Design and Access Statements provide sufficient design guidelines for developments and there is no additional information provided in the policy or supporting text that clearly sets out the justification for this requirement.

e) Green Belt

With reference to the comments regarding the redevelopment of employment sites under the 'Housing' section above and the requirement to allocate sufficient land to meet the minimum housing provision targets as required by the East of England Plan, Colonnade considers that the chapter on Green Belt, and policy GB1 in particular, fails to provide the necessary evidence base that will allow it to be monitored effectively.

It is inherent that the proposed redevelopment of previously developed employment sites for residential use in order to reduce the requirement to allocate previously undeveloped land for residential use will displace these employment uses. In turn, therefore, the separate allocation of previously undeveloped Green Belt to accommodate the compensatory employment provision is required. This is accepted in principle at paragraph 11.11 of the CSS.

Without providing clarification of the anticipated quantum of land required to accommodate the provision of housing and compensatory and new employment land, it is not possible to monitor the performance of policy GB1.

However, using the Council's figures in the table setting out the breakdown of the housing provision figures in Chapter 4 of the CSS (assuming that actual completions and extant permissions are all on previously developed land), setting aside the displacement of employment uses referred to above, approximately 42% of the required minimum housing provision target is capable of being accommodated on previously developed land (2,005 units from a total of 4,750). As such, the Council is required to provide at least 58% of the required minimum housing provision target on the Green Belt (2,745 units from a total of 4,750).

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If these figures are adjusted to take account of the displacement of employment uses (assuming the provision of an equal quantity of land is required to compensate for the employment land that is redeveloped), this figure changes to 17.5% on previously developed land and 82.5% on Green Belt (828 and 3,922 units from a total of 4,750 respectively). Even allowing for the achievement of higher densities of employment on new developments, the figures above are unlikely to change significantly.

Furthermore, the table in Chapter 4 also confirms that no previously developed land will be available for development beyond 2021, or 2015 if account is taken of the displacement of the employment uses.

In light of this, not only does Chapter 6 fail to provide the necessary evidence base that will allow it to be monitored effectively, it is also necessary to consider whether it presents the most appropriate strategy for addressing the required release of Green Belt land to accommodate the defined housing and employment delivery targets to 2025 and beyond as necessary. Colonnade considers a more robust approach that is flexible and capable of being monitored, would be to clearly identify those sites capable of delivery in the short term, which for the avoidance of doubt includes those sites being promoted by Colonnade, with a reservoir of alternative sites set aside for future growth.

As set out in the representations to the Preferred Options Core Strategy, Colonnade considers that the inclusion of an affordable housing exception policy within the CSS will aid the delivery of community housing within rural areas. However, the CSS does not contain such a policy, or adequately address the issue of community housing within rural areas and the CSS is not considered to provide sufficient flexibility to allow for the delivery of essential rural housing.

f) Environmental Issues

Colonnade has concerns regarding the justification for and effectiveness of a number of the policies contained within the Environmental Issues chapter, as follows:

â€¢ Policy ENV1: The Council fails to identify how it will "maintain, restore and enhance" the sites of nature conservation importance that are identified, or how the performance of this policy will be monitored;

â€¢ Policy ENV3: In the context of the advice at paragraph 4.32 of PPS12 regarding the reformulation of national policies, Colonnade does not consider that this policy is required; and

â€¢ Policy ENV9: As set out in the representations to the Preferred Options Core Strategy, Colonnade does not consider that the necessary evidence base has been provided to justify a policy that seeks to go above and beyond the policy targets for the Code for Sustainable Homes as set out by Central Government.

g) Community Infrastructure, Leisure and Tourism

Policy CLT1 refers to the requirement for residential and employment development to contribute to the infrastructure identified in Appendix CLT1 through Standard Charges.

However, whilst the general principle of securing planning obligations through the application of standard charges is broadly accepted, the list of infrastructure requirements set out in Appendix CLT1 is not supported by sufficient evidence base to identify its robustness and credibility. As such, Colonnade does not consider either policy CLT1 or Appendix CLT1 is justified in the context of PPS12.

It is also noted that, despite the clarification sought by Colonnade at the Core Strategy Preferred Options stage, the CSS fails to confirm what information should be contained within Health Impact Assessments, which are required by policy CLT4. Once again, Colonnade requests further clarification of what is involved in the assessment and the expected outputs, which will provide greater clarity and will allow the policy to be monitored.

h) Transport

Policy T8 confirms that the Council will apply minimum parking standards. As set out in the representations to the Preferred Options Core Strategy, the guidance in Planning Policy Guidance Note 13: Transport (PPG13) is clear regarding the imposition of parking standards.

Paragraphs 52-56 of PPG13 confirm that the Local Planning Authorities should apply maximum not minimum parking standards. In order to satisfy the legal requirements set out in PPS12, the policy must reflect PPG13 to promote sustainable transport choices and further provide incentives for developers to locate further residential land closer to local service centres by requiring maximum parking standards for residential developments.

i) Economic Development

As set out in the representations to the Preferred Options Core Strategy, the land at Three Ashes Farm provides an excellent opportunity to deliver employment growth in the short term and may be a suitable site for the 'Eco-Innovation Centre' that is being promoted by the Council. Its identification as a suitable location for strategic employment growth, or the provision of an Eco-Innovation Centre, would accord with the general principles of the policies contained within Chapter 11.

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The identification of Purdeys Industrial Estate as fit for purpose (in paragraph 11.32 and the Council's 2008 Employment Land Study 2008) and therefore it should be maintained and if possible expanded, is welcomed and Colonnade considers that Three Ashes Farm could deliver this expansion, providing a natural extension to Purdeys Industrial Estate and being strategically located close to the Airport.

Three Ashes would address the negative impacts that the nearby residential area experiences from the existing Industrial Estate by providing a buffer between established uses and the residential area with less intensive employment activities. The highways analysis that has been carried out has suggested that it would not have an adverse impact on roads and congestion. Furthermore, there are very few opportunities for businesses to expand and Three Ashes could provide this opportunity.

j) Conclusions

Following the submission of representations to the Preferred Options Core Strategy, Colonnade is disappointed to note that the CSS fails to take account of the majority of the issues raised in their representations.

In addition, Colonnade considers the plan to be 'unsound' as the document consistently fails to meet the tests of soundness set out in the table following Paragraph 4.52 of PPS12 and respectfully requests that the Council notifies Icen, on behalf of Colonnade, of the future arrangements for the Examination of the Core Strategy. Furthermore, Colonnade wishes to take this opportunity to formally register a request to appear at all stages of the Examination in Public, including the pre-hearing meeting and any planned hearing sessions whereby issues raised in the context of this letter are to be discussed. Please confirm this request, and that the representations made to the Preferred Options Core Strategy will be taken into account alongside the current representations, by way of return to this letter.

Icen Projects, on behalf of Colonnade Land LLP trusts that the Council will find these representations to be constructive and helpful in taking forward the Core Strategy. Should you wish to discuss any aspect of these representations further, please do not hesitate to contact us.

Summary:

Policy CLT1 refers to the requirement for residential and employment development to contribute to the infrastructure identified in Appendix CLT1 through Standard Charges.

However, whilst the general principle of securing planning obligations through the application of standard charges is broadly accepted, the list of infrastructure requirements set out in Appendix CLT1 is not supported by sufficient evidence base to identify its robustness and credibility. As such, Colonnade does not consider either policy CLT1 or Appendix CLT1 is justified in the context of PPS12.

It is also noted that, despite the clarification sought by Colonnade at the Core Strategy Preferred Options stage, the CSS fails to confirm what information should be contained within Health Impact Assessments, which are required by policy CLT4. Once again, Colonnade requests further clarification of what is involved in the assessment and the expected outputs, which will provide greater clarity and will allow the policy to be monitored.

Change to Plan

Appear at exam? Yes

Soundness Tests i, iii

Core Strategy Submission Document

S - 16385 - 8267 - Policy CLT1 - Planning Obligations and Standard Charges - None

16385 Support

CHAPTER 9 Policy CLT1 - Planning Obligations and Standard Charges

Respondent: Aber Ltd [8267]

Aber Ltd
C/o Agent

Agent: Colliers CRE (Mr S Chapman) [8266]

Colliers CRE
9 Marylebone Lane
London
W1U 1HL
020 7344 6533

Full Text:

The use of planning obligations and standard charges for financial contributions towards the required off-site and strategic infrastructure is supported. The prompt and efficient use of financial contributions should be required.

Summary:

The use of planning obligations and standard charges for financial contributions towards the required off-site and strategic infrastructure is supported. The prompt and efficient use of financial contributions should be required.

Change to Plan N/A

Appear at exam? No

Soundness Tests N/A

Core Strategy Submission Document

O - 16562 - 8324 - Policy CLT1 - Planning Obligations and Standard Charges - i, ii, iii

16562 Object

CHAPTER 9 Policy CLT1 - Planning Obligations and Standard Charges

Respondent: Mr J Needs & Aston Unit Trust [8324]

C/o Sellwood Planning
Stoughton Cross House
Stoughton Cross
Wedmore
Somerset
BS28 4QP

Agent: Sellwood Planning (Mr R M Sellwood) [5054]

Sellwood Planning
Stoughton Cross House
Stoughton Cross
Wedmore
Somerset
BS28 4QP

Full Text:

The policy is unsound in that
- the first paragraph does not make it clear that the contributions will be directly related to the infrastructure needs arising from that development. As currently phrased, the policy is more open ended and not in accordance with Circular 05 / 00
- the third paragraph should state whether the "Document" will be a DPD or an SPD.

Amend Policy CLT1 as follows

- paragraph 1 "where a development gives rise to a need for additional or enhanced infrastructure, the Council will require the developer to enter into legal agreements to secure planning obligations ..." (rest of policy unchanged)
- paragraph 3 - Specify whether the "Document" is a DPD or an SPD.

It is considered that our participation at the oral part of the public examination would assist the Inspector for two main reasons

- Sellwood Planning has a detailed knowledge of the Rochford area, appeared at the last Local Plan Inquiry and was a participant at the RSS public examination. This direct knowledge of the local area and the statutory Development Plan may be of assistance to the Inspector
- Sellwood Planning has experience in promoting major schemes through Core Strategies (eg. 7,000 dwellings in Ashford, 5,750 dwellings in Dover, 2,500 dwellings in Horsham and 1,200 dwellings in Newmarket) and the emerging body of evidence of what constitutes a sound Core Strategy and what is unsound. Our experience indicates that, in a number of respects, the submitted Core Strategy is unsound in its present form.

Summary:

The policy is unsound in that
- the first paragraph does not make it clear that the contributions will be directly related to the infrastructure needs arising from that development. As currently phrased, the policy is more open ended and not in accordance with Circular 05 / 00
- the third paragraph should state whether the "Document" will be a DPD or an SPD.

Change to Plan

Amend Policy CLT1 as follows

- paragraph 1 "where a development gives rise to a need for additional or enhanced infrastructure, the Council will require the developer to enter into legal agreements to secure planning obligations ..." (rest of policy unchanged)
- paragraph 3 - Specify whether the "Document" is a DPD or an SPD.

Appear at exam? Yes

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 16716 - 7834 - Policy CLT1 - Planning Obligations and Standard Charges - i

16716 Object

CHAPTER 9 Policy CLT1 - Planning Obligations and Standard Charges

Respondent: Ms G Yeadell [7834]

6 Southend Road
Hockley
Essex
SS5 4QQ
01702 205450

Agent: N/A

Full Text: Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1

Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2 you discarded N.E.Hockley as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley..along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

Response to C.S Preferred Options 2008 and HAAP 2009

June 2009 issue C S Submission issue says Eldon Way will be used for housing, whereas Sept.2009 issue says "alternative uses, including residential.." to be decided by HAAP (Issues consultation done, Pref.Options issue awaited, but judging from JAAP Pref.Options decision - namely biggest option chosen against overriding opposition, it will be housing).

Need to be logical and even-handed in proposals

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

Establish likely level of Standard Charges. Accept you cannot turn district into motorways with wholesale demolition.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

Para.10.5 "..highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which cannot be altered without much destruction.

Reply to CS Pref. Options 2008 & HAAP Issues/Options 2009

Policy T3, CLT1 Appendix CLT1 Public transport RDC admits this is in the private sector. In Hockley, operator has cut No7 service to 1 per hour from Ashingdon Schools, claiming it is unviable beyond. This is unlikely to change as Hockley is car dependant. No8 bus through Hawkwell is cut to 1 per hour to Rayleigh, for same reason as No7. Proposed planning agreements with developers can't run: eg, a community centre or classroom given by a developer remains once he has moved on - how can that apply for an on-going bus service?

Reply to Infrastructure Transport in CS Pref. Opts. 2008 and to HAAP Issues Opts. 2009.

Ch.11 Economic development

Policy ED3 Core Strategy preferred Options 2008 hinted at possible housing in Eldon Way site. June 2009 Submission version, without consultation, said Eldon Way would be housing (map included Foundry, not the text). September 2009 Submission said redevelopment would be in HAAP (which apart from the Issues/Options version, is unfinished. Judging from results of JAAP Preferred Options where biggest option is chosen, though most respondents were against it, site will be housing, without consultation.

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CHAPTER 9 Policy CLT1 - Planning Obligations and Standard Charges

Para.1.25, Para.11.32 Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to accommodated employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

Reply to HAAP Issues Options 2009

Remove compulsory relocation

Policy ED4 Policy states Council will allocate 18ha of land to make up for de-allocations in ED3 - that proves point above.

Proposals for moving employment to out of town locations with no existing transport links are contrary to government policies PPG4, PPS1 and PPS4 and Core Strategy Policy T1.

Evidence Base is ignored by contravening Hockley Parish Plan 2007 and ignoring residents' views on HAAP Issues/Options. Next stage of HAAP Preferred Options is pre-empted and rendered irrelevant. Core Strategy plans to relocate Eldon Way Foundry estate to Greenfield site with no nearby bus or railway. RDC plans to upgrade the nearest road to dual carriageway, though the connecting B1013 (through Hockley) will stay single, said by ECC Highways statistics to be 72% capacity. Airport bosses and council cannot suggest there will be no traffic growth from JAAP and new industrial site.

Reply to Hockley Parish Plan 2007. HAAP Issues 2009

Move to new industrial site near airport contravenes PPS4:

- EC7.3C "out of centre sites, with preference given to sites...well served by choice of...transport and...close to centre and...high likelihood of forming links with centre". There is no current public transport and links with centres is unlikely".

- EC 7.5.1 "whether the site is or will be accessible and well served by choice of transport, public transport, walking and cycling, as well as by car...". Remote location, narrow busy B1013 makes the site unsuitable for access by cycle or on foot.

It also contravenes PPS1 (27vii)... "reduce need to travel, encourage accessible public transport provision to secure more sustainable patterns of transport...Planning should actively manage patterns of urban growth to make fullest use of public transport and focus development in existing centres, near to major public transport interchanges". Core Strategy undermines its own policy Transport and Highways policy T1 and is unsound.

Although shown on accompanying drawing in earlier versions, there was no prior textual mention of Foundry industrial estate (next to Eldon Way) for redevelopment until current CS 2009 Submission. This was stated to be a typing error, but does not inspire confidence in reliability of drafting.

Revise both 2009 Core Strategy and 2009 HAAP Issues/options

Chapter 12: Retail/Town centres

The Core Strategy misrepresents findings of the Retail and Leisure Study 2008.

Para.12.38 The Core Strategy states (para.12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace."

Whereas the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure".

2) (10.28) "There is no immediate capacity for additional floorspace".

3) (10.29) "we recommend focus be maintained on developing Hockley's existing strengths, rather than retail expansion"

4) 10.31 "the current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it has a very small catchment population. Accordingly, the council may wish to consider reclassifying Hockley from a town centre to a district centre".

Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

The Council will work with landowners and its partners to deliver the HAAP.

Remove threat of compulsory purchase orders.

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O - 16716 - 7834 - Policy CLT1 - Planning Obligations and Standard Charges - i

16716 Object

CHAPTER 9 Policy CLT1 - Planning Obligations and Standard Charges

One doesn't perceive impartiality when the Planning Director replies to local HAAP survey with "The affluent people of Hockley are entitled to famous name shops".

Chapter 5: Character of Place and Local Lists

Para.5.4 "Rochford district has unique character..stems from traditional buildings..still dominate towns and villages".

Para.5.17 "Council believes many buildings..are of local distinctiveness..part of..cherished local scene".

This only applies to favoured places: Rochford, Rayleigh, greenbelt villages. Many Hockley conservable items have been systemically removed for supposedly lucrative development in face of widespread protect. This is for supposed need for housing. In fact heritage items have been replaced by dwellings most cannot afford, and/or are hard to sell due to unsuitability of massing and siting. Many other homes are jeopardised by this practice.

HAAP issues 2009. Core Strategy 2006, 2007,2008, SCI.2006

Fewer 'vested interests', more even handedness. No more pressing people out of businesses, homes for expediency.

A CPRE Fieldwork issue extolled Local Lists, citing refusal of 16 flats to replace character house, not on local list. Inspector said house, facade made a contribution to area character, even if English heritage decided it didn't warrant listing. Council worked to get the house grade listed and even made adjacent area conservation one.

Hockley had one such on a "significant site" faced with 13 flats. Ward Member omitted house from refusal proposal, so house could be demolished. RDC dropped Local List ahead of appeal: "Government frowned on such Lists" (Other LAs, unaware of supposed directive retained theirs. After demolition RDC restored Local Lists, saying Government now support them. When Inspector queried the complaint, the then policy officer said "just politics, lot of local interest, nothing of character in the area[!]. (A dozen such items had been removed). Some "distinctive" Hockley buildings are still condemned (in Greensward Lane., others threatened (Spa Road). Whereas a modest hue and cry in Rayleigh will usually result in a building being saved.

Conclusion

Core Strategy Submission DPD is basically unsound in many respects

Incomplete information. Amongst others, it refers to Hockley AAP, the first stage of which is complete, but not other three. Rochford AAP first stage has been published in arrears of Core Strategy Submission. Rayleigh AAP is still awaited. Precise housing sites are absent, as Urban Capacity Study 2007 has been superseded by Strategic Housing Land Availability Assessment, not yet published. Traders, residents, are thus responding to Core Strategy Submission with incomplete information.

Lack of community involvement. Chapter 1, Introduction, para. 1.11 "Community involvement is an essential part of the plan making process".

In Statement of Community Involvement 2006 Rochford RDC "recognises need to enable people to have their voices heard".

Re Public Meetings: "Consideration will be had to timing and venue to ensure meeting is as accessible as possible".

Take Hockley Area Action Plan as an example of the opposite of all this:- Presentation of document was at Hullbridge, 7.30pm. It was also discussed with JAAP at Rochford Freight House (for traders only) at 7am, without publicity. Excuse made: HAAP on RDC website, which none will seek unless knowing it is there. Rochford District Matters newsheet had minute articles on p.3, half way through consultation period. Another excuse: a 2nd presentation by Hockley Residents Association with planning officer present: only because of complaints, and it is not the HRA's responsibility to RDC's job. Due to unavoidable haste of calling meeting, few knew and only 50 were present.

In Core Strategy Submission Hockley Parish Plan has been ignored. Proposals also ignore 95% rejection rate response to HAAP 2009, which included proposals for Eldon Way employment site.

Unfettered right of developers to carry on as if Core Strategy didn't exist. In PPS 12, Ch.4.6 states: "Core Strategies should be flexible and able to show how they handle contingencies". Several large planning applications have been submitted proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS 12.

Where are we? Finally, at Chapter 1, Introduction, para. 1.24: "the Core Strategy will have to be reviewed in the event of a new Local Area Agreement, post-2011, setting different priorities". So what purpose does all this work serve? So we have hardly finished this exercise, before it all starts again?

Summary:

Policy T3, CLT1 Appendix CLT1 Public transport RDC admits this is in the private sector. In Hockley, operator has cut No7 service to 1 per hour from Ashingdon Schools, claiming it is unviable beyond. This is unlikely to change as Hockley is car dependant. No8 bus through Hawkwell is cut to 1 per hour to Rayleigh, for same reason as No7. Proposed

Core Strategy Submission Document

O - 16716 - 7834 - Policy CLT1 - Planning Obligations and Standard Charges - i

16716 Object

CHAPTER 9 Policy CLT1 - Planning Obligations and Standard Charges

planning agreements with developers can't run: eg, a community centre or classroom given by a developer remains once he has moved on - how can that apply for an on-going bus service?

Change to Plan

Appear at exam? Not Specified Soundness Tests i

Core Strategy Submission Document

O - 16749 - 14229 - Policy CLT1 - Planning Obligations and Standard Charges - i, iii

16749 Object

CHAPTER 9 Policy CLT1 - Planning Obligations and Standard Charges

Respondent: Hockley Under Threat (J Abbey) [14229]

Agent: N/A

Hockley Under Threat
None provided

Full Text:

Ch. 4 Housing; Ch.10 Transport, Highways; Ch.11 Economic Development; Ch.12 Retail/town centres; Ch.5 Character of place & Local Lists

Chapter 4: Housing

Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1, Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2

N.E.Hockley was discarded as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley...along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

Need to be logical and even-handed in proposals

June 2009 issue C S Submission issue says Eldon Way will be used for housing, whereas Sept.2009 issue says "alternative uses, including residential.." to be decided by HAAP (Issues consultation done, Pref.Options issue awaited, but judging from JAAP Pref.Options decision - namely biggest option chosen against overriding opposition, it will be housing).

Policy H1, T1 Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG14 & PPS1. it also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths",

The Core Strategy also contravenes its own policy T1 and is unsound.

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

Establish like motorways with wholesale demolition.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts.

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Para.10.5

Policy T3, CLT1 Appendix CLT1

T1 & T2 "...highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which

Core Strategy Submission Document

16749 Object

CHAPTER 9 Policy CLT1 - Planning Obligations and Standard Charges

cannot be altered without much destruction.

Public transport RDC admits this is in the private sector. In Hockley, operator has cut No 7 service to one per hour from Ashingdon Schools, claiming it is unviable beyond. This is unlikely to change as Hockley is car dependant. No 8 bus through Hawkwell is cut to one per hour to Rayleigh, for same reason as No 7. Proposed planning agreements with developers can't run: e.g., a community centre or classroom given by a developer remains once he has moved on - how can that apply for an on-going bus service?

Ch.11 Economic development

Policy ED3 Core Strategy preferred Options 2008 hinted at possible housing in Eldon Way site. June 2009 Submission version, without consultation, said Eldon Way would be housing (map included Foundry, not the text). September 2009 Submission said redevelopment would be in HAAP (which apart from the Issues/Options version, is unfinished. Judging from results of JAAP Preferred Options where biggest option is chosen, though most respondents were against it, site will be housing, without consultation.

Para.1.25 Para.11.32

Policy ED4 T1 & T2 Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to accommodated employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

Remove compulsory relocation

Policy states Council will allocate 18ha of land to make up for de-allocations in ED3 - that proves point above.

Proposals for moving employment to out of town locations with no existing transport links are contrary to government policies PPG4, PPS1 and PPS4 and Core Strategy Policy T1.

Evidence Base is ignored by contravening Hockley Parish Plan 2007 and ignoring residents' views on HAAP Issues/Options. Next stage of HAAP Preferred Options is pre-empted and rendered irrelevant.

Core Strategy plans to relocate Eldon Way Foundry estate to Greenfield site with no nearby bus or railway. RDC plans to upgrade the nearest road to dual carriageway, though the connecting B1013 (through Hockley) will stay single, said by ECC Highways statistics to be 72% capacity. Airport bosses and council cannot suggest there will be no traffic growth from JAAP and new industrial site.

Revise both 2009 Core Strategy and 2009 HAAP Issues/options

Move to new industrial site near airport contravenes PPS4:

EC7.3C "out of centre sites, with preference given to sites..well served by choice of..transport and..close to centre and..high likelihood of forming links with centre". There is no current public transport and links with centres is unlikely".

EC 7.5.1 "whether the site is or will be accessible and well served by choice of transport, public transport, walking and cycling, as well as by car..". Remote location, narrow busy B1013 makes the site unsuitable for access by cycle or on foot.

It also contravenes PPS1 (27vii).. "reduce need to travel, encourage accessible public transport provision to secure more sustainable patterns of transport..Planning should actively manage patterns of urban growth to make fullest use of public transport and focus development in existing centres, near to major public transport interchanges". Core Strategy undermines its own policy Transport and Highways policy T1 and is unsound.

H1 & RTC6 Although shown on accompanying drawing in earlier versions, there was no prior textual mention of Foundry industrial estate (next to Eldon Way) for redevelopment until current CS 2009 Submission. In recent amendment to the CS this was stated to be due to a typing error!

Chapter 12: Retail/Town centres

The Core Strategy misrepresents findings of the Retail and Leisure Study 2008.

Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

Para.12.38 H1 & RTC6 The Core Strategy states (para.12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace."

Whereas the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food

Core Strategy Submission Document

16749 Object

CHAPTER 9 Policy CLT1 - Planning Obligations and Standard Charges

shopping expenditure".

2) (10.28) "There is no immediate capacity for additional floorspace".

3) (10.29) "we recommend focus be maintained on developing Hockley's existing strengths, rather than retail expansion"

4) 10.31 "the current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it has a very small catchment population. Accordingly, the council may wish to consider reclassifying Hockley from a town centre to a district centre".

Remove threat of compulsory purchase orders.

The Council will work with landowners and its partners to deliver the HAAP.

Chapter 5: Character of Place and Local Lists

Para.5.4 "Rochford district has unique character..stems from traditional buildings..still dominate towns and villages".

Para.5.17 "Council believes many buildings..are of local distinctiveness..part of..cherished local scene".

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Summary:

Policy T3 CLT1 Appendix CLT1 T1 & T2

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Change to Plan

Appear at exam? Not Specified

Soundness Tests i, iii

Core Strategy Submission Document

O - 16820 - 9676 - Policy CLT1 - Planning Obligations and Standard Charges - i, ii, iii

16820 Object

CHAPTER 9 Policy CLT1 - Planning Obligations and Standard Charges

Respondent: Bellway Homes [9676]

Bellway Homes
Bellway House
Bury Street
Ruislip
Middlesex
HA4 7SD
UK

Agent: Barton Willmore LLP (Mr E Hanson) [14266]

Barton Willmore LLP
7 Soho Square
London

W1D 3QB

020 7446 6888

Full Text:

See statement

Council ref AE18 and AE18a

Summary:

See statement

Council ref AE18 and AE18a

Change to Plan

See statement

Council ref AE18 and AE18a

Appear at exam? Yes

Soundness Tests i, ii, iii

Core Strategy Submission Document

S - 16858 - 9889 - Policy CLT1 - Planning Obligations and Standard Charges - None

16858 Support

CHAPTER 9 Policy CLT1 - Planning Obligations and Standard Charges

Respondent: Environment Agency (Miss Carrie Williams) [9889] **Agent:** N/A

Environment Agency
Iceni House
Cobham Road
Ipswich
Suffolk
IP3 9JD
United Kingdom
01473 706007

Full Text: We support the inclusion of this policy because Appendix CLT1 includes Sustainable Drainage Systems and flood protection measures.

Summary: We support the inclusion of this policy because Appendix CLT1 includes Sustainable Drainage Systems and flood protection measures.

Change to Plan N/A

Appear at exam? No **Soundness Tests** N/A

Core Strategy Submission Document

S - 16885 - 8329 - Policy CLT1 - Planning Obligations and Standard Charges - None

16885 Support

CHAPTER 9 Policy CLT1 - Planning Obligations and Standard Charges

Respondent: Swan Hill Homes Limited [8329]

Swan Hill Homes Limited
C/O Agent
Mr P Kneen
Charles Planning

Agent: Charles Planning Associates Ltd (Mr P Kneen) [5040]

Charles Planning Associates Ltd
1644-1645 Parkway
Solent Business Park
Whiteley
Fareham
Hampshire
PO15 7AH
01489 580853

Full Text:

1.0 Instruction and Introduction

1.1 Charles Planning Associates Limited (Chartered Town Planners) is Instructed by Swan Hill Homes Limited (Swan Hill) to prepare and submit representations on their behalf in respect of the Rochford District Local Development Framework: Core Strategy Submission (September 2009) Development Plan Document.

1.2 The comments refer to the relevant sections and policy designations in the Submission document, as appropriate.

1.3 The comments set out in this submission are intended to assist the District Council in taking forward its Local Development Framework. It is our intention to continue to be involved in the LDF preparation process and we look forward to the opportunity to comment further at the Examination to the Core Strategy.

1.4 If you have any queries regarding the content of this submission then please do not hesitate to contact:

Peter Kneen BSc (Hons) MSc MRTPI
Planner

2.0 Housing:

Policy H1 - The Efficient Use of Land for Housing

2.1 Swan Hill recognises the importance of seeking to concentrate new developments mainly in the existing urban areas, on previously developed land where possible, particularly in view of the Government seeking to ensure 60% of all such new developments are on previously development land (PDL).

2.2 However, given the character of the District, and the strategic housing requirement of the East of England Plan, Swan Hill supports the approach that the Council must also make provision for additional development on the edge of existing settlements on greenfield sites, particularly in the most sustainable locations. As such, Swan Hill supports that where feasible, the redevelopment of existing employment sites for residential/employment purposes can make a contribution towards the strategic housing requirement, provided that sufficient additional employment land is brought forward to ensure the stability of employment levels in the District, and to ensure employment growth meets the East of England Plan requirements.

2.3 Swan Hill considers that Policy H1 should include consideration that new extensions to existing settlements have regard to their potential impact on the wider characteristics and openness objectives of the Green Belt.

Policy H2 - Extensions to Residential Envelopes and Phasing

2.4 Swan Hill generally supports the approach taken by the Council in this policy. As set out above, Swan Hill consider the Council's acknowledgment that housing requirements should be met through the allocation of land on the edge of the existing settlements is the most suitable way forward to meeting the Council's strategic housing requirement and complies with the advice in PPS3.

2.5 The need for suitable greenfield urban extensions represents the best way forward for the Council to meet its strategic housing requirement, as set out in the East of England Plan. Swan Hill supports the recognition that the potential supply of alternative previously developed sites is limited, without detrimentally affecting the character of the District, and therefore the best way forward is the use of sustainable greenfield urban extensions to the existing settlements of the District.

2.6 However, Swan Hill consider that a fundamental consideration that the District Council should consider relates to the potential impact of the urban extensions on the Green Belt policy has been somewhat overlooked. The wider sustainability credentials of the settlements of the District should only be one of many key considerations for determining the level of expansion. In view of the proximity of Southend-on-Sea to all the main settlements of the District, and the influence this has on the likely location many people would travel for employment and leisure, sustainability of many of the settlements is not a key overarching factor, and greater weight should be placed on the potential impact on the openness of the Green Belt, as this cannot be remedied if development occurs in the wrong location.

2.7 As such, Swan Hill considers that determining the location of growth for the main settlements should be to identify

Core Strategy Submission Document

S - 16885 - 8329 - Policy CLT1 - Planning Obligations and Standard Charges - None

16885 Support

CHAPTER 9 Policy CLT1 - Planning Obligations and Standard Charges

those locations where the impact on the wider setting of the Green Belt can be minimised. Further justification for those general locations chosen should be identified in Policy H2. In this regard, Swan Hill has serious concerns regarding the removal of Land South West of Great Wakering as a viable option for the growth of the settlement. The development of this area of Great Wakering, in addition to the potential redevelopment of the Star Lane Industrial Estate could provide a more comprehensive development, whilst ensuring that the wider openness of the Green Belt is maintained. Land South West of Great Wakering is significantly better placed to limit the impact on the wider Green Belt than Land West of Great Wakering, and could contribute to the provision of an important amenity and wildlife site for the local community.

2.8 In addition, Swan Hill consider that the Council now has no reserve provision in the event that any of the existing employment sites set out in Policy H1 fail to come forward for development within the envisaged timescale. Further, Land West of Great Wakering has not been identified in the SHLAA as a deliverable site to help meet the strategic housing requirement, contrary to the requirement set out in PPS3.

2.9 As such, Swan Hill would support the provision of suitable sites which could be safeguarded for future development in the likelihood of a shortfall in supply.

Policy H3 - Extensions to Residential Envelopes Post 2021

2.10 As set out above, Swan Hill supports the overall approach the Council has taken towards the provision of sustainable urban extensions as a suitable means of meeting their strategic housing requirement. However, as set out for Policy H2 above, Swan Hill has serious concerns regarding the removal of several proposed sites set out in the October 2008 Preferred Options Core Strategy, without any guarantee of the ability to deliver those sites set out in Policy H1.

2.11 As also considered above, the inclusion of West of Great Wakering for 250 dwellings should not be included ahead of South West of Great Wakering, in view of the fact that the site is not identified in the SHLAA as available, suitable and achievable as required by PPS3, and thus is not supported by a robust and creditable evidence base for its inclusion as a strategic site for development.

2.12 Whilst Swan Hill acknowledge that alterations to Policy H1 has resulted in the removal of some locations for growth in Policy H3 (as set out in the Sustainability Appraisal), Swan Hill does not consider that the most appropriate locations have been chosen.

2.13 In addition to the matters raised above, the use of West of Great Wakering would also result in the loss of valuable agricultural land, which clearly in a Green Belt location, should be less suitable for development than other sites, such as South West of Great Wakering, which would have limited impact on the wider Green Belt policy, and not result in the loss of valuable agricultural land.

2.14 Finally, in respect of Policies H1, H2 and H3, all of the above comments are based on our interpretation of the Submission Version Core Strategy when compared to the October 2008 Version of the Core Strategy. Without the ability to undertake a detailed assessment of the Council's SHLAA, it is not possible to clarify the proposed Core Strategy position regarding the proposed direction of growth proposed for the settlements in the District. As such, Swan Hill reserves the right to make additional representations regarding the proposed Policies H1, H2 and H3 following the publication of the SHLAA in due course.

Policy H4 - Affordable Housing

2.15 In general terms, Swan Hill supports the approach taken by the Council towards the provision of affordable housing for new residential developments. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H5 - Dwelling Types

2.16 Swan Hill supports the policy provision of H5, and considers that the approach taken by the Council for this policy represents a suitably flexible alternative to stipulating percentages of dwelling mix, sought by some local authorities. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H6 - Lifetime Homes

2.17 In regard to this policy, Swan Hill objects to the Council's policy where all new dwellings should be provided to the Lifetime Homes Standard. Whilst it is acknowledged that the UK has an aging population, Swan Hill considers that seeking to provide Lifetime Homes on all sites is considered to be overly onerous for proposed developers, particularly when considering the requirement for all car parking spaces to be suitable for disabled users, which could result in more schemes becoming unviable. Therefore, the provision of a percentage of Lifetime Homes should be considered through negotiations with the Council at the planning application stage, and should be determined on a case-by-case basis.

3.0 Character of Place: Policy CP1 - Design

Core Strategy Submission Document

S - 16885 - 8329 - Policy CLT1 - Planning Obligations and Standard Charges - None

16885 Support

CHAPTER 9 Policy CLT1 - Planning Obligations and Standard Charges

3.1 The Town and Country Planning (General Development Procedure) Order 1995 (As Amended) makes the submission of a Design and Access Statement for most types of planning applications a Statutory requirement, and as such, the provision of a Design Brief represents a pre-requisite of all major planning applications.

3.2 Policy CP1 seeks to ensure the provision of good, high quality developments that reflect local characteristics and distinctiveness, this ideology is supported by Swan Hill.

4.0 The Green Belt:
Policy GB1 - Green Belt Protection

4.1 Following the amendments to the wording of the Policy since the October 2008 Preferred Options Core Strategy, Swan Hill is now generally supportive of Policy GB1 and its supporting text. However, as expressed above, it is important that where alterations to the Green Belt boundary occur as a result of the extension of the settlements to meet the strategic housing requirement, both the minimal amount of land is taken and where that land is taken for development, it represents the best available land which has a minimal impact of the wider openness characteristic of the Green Belt.

5.0 Environmental Issues:
Policy ENV3 - Flood Risk

5.1 Swan Hill generally supports the approach set out in Policy ENV3 regarding ensuring development accords with the sequential test of PPS25. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV4 - Sustainable Drainage Systems (SUDS)

5.2 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV4. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV8 - On-site Renewable and Low Carbon Energy Generation

5.3 Whilst Swan Hill recognises the importance of reducing carbon emissions, particularly in new housing developments, and the role this can play in reducing the nations overall Greenhouse emissions. As such Swan Hill is generally supportive of Policy ENV8. It is noted that Policy ENG1 of the East of England Plan sets out a threshold of developments comprising 10 or more dwellings. Swan Hill consider it important for the District Council to justify the reduction in the threshold level.

5.4 Further, no assessment of Policy ENV8 has been set out in the Sustainability Appraisal which justifies the change in threshold from that of Policy ENG1 of the RSS.

Policy ENV9 - Code for Sustainable Homes

5.5 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV9. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

6.0 Community Infrastructure, Leisure and Tourism:
Policy CLT1 - Planning Obligations and Standard Charges

6.1 Swan Hill generally supports the overall approach the Council has taken in Policy CLT1. It is considered Policy CLT1 sets out a degree of flexibility to ensure that all sites are considered on a site-by-site basis, assessing the individual merits of each planning application, in order to ensure the levels of contributions applicable meet the five tests of Circular 05/05. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policies CLT5 - Open Space;
CLT7 - Play Space;
CLT8 - Youth Facilities; and,
CLT10 - Playing Pitches

6.2 Swan Hill supports the need for new residential developments to incorporate a degree of new publicly accessible open space, children's play space, youth facilities and playing pitches, and as such, generally supports the policy approaches taken by the Council.

6.3 However, it is important that whilst the Council may seek to undertake an assessment of providing standard charges for new development, which, as set out in Policy CLT1, this should be based on thorough public consultation and consideration and sound justification. Swan Hill consider that within the provision of a standard charge, it is important that such provision allows for a degree of flexibility to ensure that each site is assessed individually and on its own merits. This is particularly important for those sites close to existing open spaces and facilities. As such, the levels of

Core Strategy Submission Document

S - 16885 - 8329 - Policy CLT1 - Planning Obligations and Standard Charges - None

16885 Support

CHAPTER 9 Policy CLT1 - Planning Obligations and Standard Charges

open space and recreation facilities required in the 'standard charge' should be based on an up-to-date PPG17 Open Space assessment, which should be used to form a key consideration in the levels of provision likely to be required in the standard charge system proposed.

7.0 Transport: Policy T1 - Highways

7.1 Swan Hill supports the overall objectives set out in Policy T1 requiring developments to be located and designed to reduce the reliance on the private car and to meet the infrastructure needs generated by development or seek to help achieve these needs is acceptable in principle.

7.2 Swan Hill recognises the importance of providing sufficient infrastructure provision to meet the requirements of development, and that where developments have insufficient consideration of impact on existing infrastructure, they should be considered unacceptable and contrary to National policy guidance. However, Swan Hill considers it important to emphasise that the developer's role should not be seen as a means to meet existing shortfalls in provision.

Policy T3 - Public Transport

7.3 Swan Hill is generally supportive of the policy approach set out in T3, however, as set out in paragraph 7.2 above, it is important that the District Council do not consider that it is the developer's responsibility to resolve existing shortfalls in provision of public transport, and any contribution towards additional public transportation provision should only be to mitigate against the additional level of demand likely from the development proposed.

Policy T5 - Cycling and Walking

7.4 Swan Hill supports the general approach to this policy, as Swan Hill recognises the importance of promoting the use of alternatives to the private car. The policy provision acknowledges the need to ensure relevant contributions in the event of additional travel demands generated by individual developments, whilst also setting out additional aspirations for the cycle network in the District.

7.5 As such, Swan Hill considers this policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy T8 - Parking Standards

7.6 The Council has recently (January 2007) adopted SPD on the requirements for parking standards, and as such, Swan Hill generally supports the policy approach chosen by the Council. As set out in the SPD, whilst Swan Hill generally supports the approach taken by the District Council towards setting residential parking standards, in that the Council has recognised that in the suburban areas, even with some access to public transport, the majority of residents will rely on the use of private cars. However, Swan Hill has concerns over the failure of the District Council to comply with the provisions of PPG13: Transport (2001) which sets out that Local Planning Authorities should not set minimum standards for car parking. Whilst it is acknowledged that PPS3 sets out provision for the consideration of local circumstances, it is considered that the Council has not justified this deviation from PPG13's maximum standard.

7.7 Whilst it is acknowledged that such justification may become apparent through the work currently being undertaken by Essex County Council, until such time, the District Council should only seek to apply the maximum standards indicated in PPG13. However, Swan Hill recommends that the District Council make provisions in the wording of the Policy to allow for changes in the event that future policy on car parking standards need to reflect the County standard, following the completion of the County Council review.

8.0 Economic Development: Policies ED3 - Existing Employment Land ED4 - Future Employment Allocations

8.1 In respect of Policies ED3 and ED4, Swan Hill notes that they have changed considerably since the October 2008 Preferred Options document, in that they are site specific regarding the location of the proposed redevelopment of existing employment sites. These four sites are also identified in Policy H1 - Efficient Use of Land, and in general, Swan Hill supports the approach to the redevelopment of these sites (where feasible) based on the assessments of the sites set out in this version of the Core Strategy.

8.2 However, Swan Hill has concerns that these policies might not be considered suitably sound given that insufficient opportunity has been allocated for consultation on their redevelopment. Without the SHLAA being publically available prior to the consultation on this Core Strategy, an insufficient evidence base has been provided to corroborate that these sites are neither suitable or deliverable to meet the test of soundness requirements.

Summary: Policy CLT1 - Planning Obligations and Standard Charges

6.1 Swan Hill generally supports the overall approach the Council has taken in Policy CLT1. It is considered Policy CLT1 sets out a degree of flexibility to ensure that all sites are considered on a site-by-site basis, assessing the

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S - 16885 - 8329 - Policy CLT1 - Planning Obligations and Standard Charges - None

16885 Support

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individual merits of each planning application, in order to ensure the levels of contributions applicable meet the five tests of Circular 05/05. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

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S - 16929 - 10009 - Policy CLT1 - Planning Obligations and Standard Charges - None

16929 Support

CHAPTER 9 Policy CLT1 - Planning Obligations and Standard Charges

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Full Text: Local Development Framework

Representations on the Core Strategy
Submission Document, November 2009
On behalf of Barratts Eastern Counties

Introduction

The requirements of Core Strategies are enshrined in the 2004 Planning and Compensation Act, the Town & Country Planning (Local Development) England (Regulations) 2004 and the 2008 policy guidance in PPS12. The requirements of Coe Strategies are clear. And they are legal requirements. The Core Strategy must comply with the Local Development Scheme, Statement of Community Involvement and the Regulations. The Core Strategy must be subject to a sustainability appraisal, have regard to national guidance, conform generally with the Regional Spatial Strategy and have regard to any Sustainable Community Strategy. A Core strategy must be sound - justified, effective and consistent with national policy. The following representations therefore focus on these legal requirements.

HOUSING

Paragraph 4.6 - Evidence Base

To meet the soundness test Submission Core Strategies (SCS) must be justified, that is to say it must be founded on robust and credible evidence base and comprise the most appropriate strategy when considered against reasonable alternatives. The housing strategy in as far as it identifies a need for Green belt sites is sound, however, there are other elements which are unsound.

Paragraph 4.6 notes that the Strategic Housing Land Availability Assessment (SHLAA) has examined the supply of housing. It is presumed that the Table at paragraph 4.6 is the outcome of this examination. Whilst the SHLAA has some legitimacy in that it identifies various sites that are apparently available, we are concerned that because the SHLAA was only published in November 2009 it post dates the SCS. This implies that the SCS is driving the SHLAA exercise rather than the other way round. Whilst this may have no real practical effect on the outcome of the SCS and the identified need for Green Belt sites, the Inspector will be mindful of the advice in paragraphs 33 and 54 of PPS3 that SCS draw on the evidence in SHLAA. It may be that the SCS should explain how the evidence base has been used to justify the strategy.

PPS12 explains at paragraph 4.37 that Core Strategies are based on thorough evidence. Since the SHLAA has only recently been published it is considered that the SCS is unsound as it is not justifiable. This, together with other comments on the SCS, indicates that the process should be delayed to ensure that a more robust document is placed in front of the EiP Inspector.

Table at Paragraph 4.6 - Evidence base

From our review of the available evidence it would appear that the housing land supply is insufficient and that Green Belt release are required. From the wider strategy being promoted we note that some of the sites that the District Council consider to be 'appropriate' are likely to relate to existing employment areas. As set out elsewhere in our representations, we maintain severe reservations that the redevelopment of existing employment sites for alternative uses and particularly the Eldon Way Industrial Estate is unsustainable. We will make reference to the effectiveness of this strategy in relation to sustainability, whether it is justified in the context of National Policy and the deliverability of such a strategy elsewhere.

In particular, paragraph 11.32 of the SCS refers to existing employment land and sites within the UCS. It does not refer the SHLAA and as such it appears that an evidence base to support the re-use of employment land for residential is not reported in the SCS.

Having reviewed the 2008 Annual Monitoring Report, as we did when commenting on the 2008 Preferred Options Core Strategy, we maintain severe doubts as to the appropriateness of some of the previously developed sites identified as potential housing sites and their expected housing yield. Whilst we cannot at this stage ascertain whether the SHLAA

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sites referred to in this table correlate with the Annual Monitoring Report and indeed the 2007 Urban Capacity Study, it is our view that there will be some commonality and so the reliance on these sites is likely to be at odds with Government Policy. We shall elaborate on this objection in relation to the specific housing policy below.

We note that the last two rows in the Table at paragraph 4.6 set out figures with and without Green Belt releases. The text to this section of the Core Strategy should, for reasons of clarity, explain that Green belt review will be necessary in order to deliver the required housing.

Paragraph 4.9

The table on page 40, which sets out the settlement tiers, is supported. Rayleigh, Rochford/Ashingdon, Hockley/Hawkwell are clearly the largest settlements in the District and they benefit from good employment, housing, leisure, community and public transport provision. These settlements are the most sustainable ones with the greatest mix of uses. Consequently, it is sensible that the Core Strategy identifies these as top tier settlements and is able to target them with growth accordingly. This component of the strategy is justified by reference to sustainability data and is effective, since targeting development at these locations will ensure a more sustainable pattern of development.

Paragraph 4.14

We maintain that the strategy for redeveloping the Eldon Way Industrial Estate for housing and other alternative uses to employment is unsound. It is neither justified nor effective. The Industrial Land Availability Study 2006 sets out on page 7 strategic objectives. The 3rd objective seeks to Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive. Clearly the strategy as currently drafted envisages major changes to existing industrial estates, including alternative uses. This strategy is not consistent with other strategies and evidence based studies and so cannot be justified in the context of the tests set out in PPS12. It is also an ineffective strategy since the new employment locations that would free up the Eldon Way site for redevelopment relies on transport infrastructure that has no certainty of being delivered. Principally, the erosion of employment uses at Eldon Way could make the settlement of Hockley/Hawkwell less sustainable and thus conflict with the tiered approach on page 40, paragraph 4.9.

Policy H1

Prioritising the use of previously developed land ("pdl") is supported in principle. It is a justified strategy in the context of PPS3 and effective as sequential choices can be made by implementing the policy. However, the District Council is also promoting a strategy which seeks the redevelopment of existing employment locations to alternative uses and by consequence is identifying green field sites for new employment development elsewhere (Policy ED4 refers). This 'land swapping' is not considered consistent with PPS3, nor is it considered to be justified or effective in delivering the desired strategy. This is particularly the case as most of the existing employment sites are occupied and therefore unavailable for redevelopment. In addition, the new Greenfield sites are in an arguably less sustainable locations away from the top tier settlements identified on page 40 of the Submission Core Strategy. Clearly this element of the strategy is inconsistent with the wider strategy.

The Industrial Land Availability Study 2006 is included as an evidence base by the District Council. It includes an introductory section, which explains that the authority wishes to make Rochford the place of choice for new business. It includes several strategic objectives on page 7 including "Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive." It reviews existing employment areas and identifies vacant land, including land available from allocations. It does not include any assessment of new sites or potential opportunities for new sites that might have been expected to feed into the Core Strategy. The strategy for identifying Green Belt site employment allocation does not appear to be based on any evidence in this document and in that context cannot be justified. The strategy being promoted potentially conflicts with Government policy in PPG13, PPG2 and emerging PPS4.

The Employment Land Study 2008 is a much later document. It has a key recommendation on page ii "we recommend that Rochford District Council adopts strong policies to protect existing employment land." Furthermore under recommendations for existing sites on page iii-iv of that document it states "In our view, Hockley Trading Centre is a strategically well placed employment location. However, we recognise the ambitions of the Hockley Town Centre masterplan and that within this the Council should consider it to be allocated for other uses. However, we recommend that this reallocation happen only if provision is made within the masterplan for office use within Hockley Town Centre as part of a mixed use scheme." The view of the writers of this document is clear - the Eldon Way Industrial estate (Hockley Trading Centre) is a good employment site and that it is for other reasons that alternative uses are being considered and only then if office development is supported. This supports our representations that new future uses at the Eldon Way site should be employment dominated and that alternative uses should relate to the objectives of the Town Centre which is to enhance the shopping and leisure facilities. Residential is not an appropriate alternative.

This document recommends the use of land to the west of Rayleigh for employment and envisages Green belt release. However, the SCS does not explain through the evidence base why existing employment sites should be 'deallocated' and Green belt land unnecessarily used.

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In addition to these key issues we have some specific concerns. As a consequence we maintain an objection to the second paragraph of Policy H1. This policy states that the Council will seek the redevelopment of various industrial estates including Eldon Way. The Policy says that alternative uses will be sought (presumably alternative to the existing employment offer) and that new land will be allocated elsewhere. This policy statement, in relation to Eldon Way in particular, is unsound for a number of reasons:

The emerging Hockley Area Action Plan consulted upon in 2008 states that the Eldon Way Industrial Estate is strategically well placed. In a sense this statement underplays the true importance of this highly sustainable employment location and only major employment area in Hockley/Hawkwell. The employment area is adjacent to the railway station and located a short distance from the main bus routes that run along Spa Road. Some of the residential areas of the town are also within walking distance of this commercial area, thus providing a potential for sustainable travel by employees. The Eldon Way Industrial Estate is therefore right at the heart of the settlement of Hockley/Hawkwell and provides an opportunity to meet sustainable transport objectives by reducing the need to travel by car. Consequently, this employment area should be highlighted as a premier employment site in sustainability terms, both in the context of PPG13, PPG4 and PPS6. To encourage alternative uses as set out in Policy H1 implies the removal of the majority of employment based activity at Hockley/Hawkwell and this would be contrary to National policy, would not be the most appropriate strategy when considered against alternatives and is therefore unsound.

Whilst it is acknowledged that improvement to the Eldon Way Industrial Estate can and should take place, the extent to which the mix of employment uses should be altered in favour of alternative land uses requires careful consideration. It is our view that a mix of existing or indeed new employment land uses with some Town Centre type uses should dominate the Eldon Way site. A mix of employment types between offices, light industry and other high technology industries should be encouraged as this will provide many locational advantages to the firms that agglomerate together. The Council says that the existing uses on this site are harmful to amenity. However, the site has operated for many years without any significant issues and if renewal for B1 type uses are encouraged then the employment area can be maintained without harm to amenity. Renewal of the employment stock can help develop and improve trade, improve the sustainability of businesses as a whole and make for a more flexible labour market as skill levels are varied. A singularly different use altogether or a variety of uses which excludes employment could undermine the long term sustainability of the area and Town Centre. As such Policy H1 is not an effective strategy and should be amended to acknowledge the importance of Eldon Way and the need to renew the employment stock to ensure that the site maintains its important role as a employment site, albeit with some ancillary alternative use development where appropriate.

The 2008 Retail Study notes that Hockley Town Centre is not strong and there is trade leakage. Eldon Way Industrial Estate provides a customer base for existing town centre uses. Weekday spending within town centres is an important contributor to the viability of many retail and leisure businesses either through expenditure by employees during the lunchtime trade or expenditure by employers, on necessary goods and services. This relationship helps sustain the critical mass of a centre and provides a platform for new retail and leisure growth. It is important to have a balanced centre with a variety of uses. Policy H1, as currently drafted, implies the removal of employment related development and this is likely to harm the vitality and viability of Hockley Town Centre. The Council has presented no evidence to suggest that this is not the case. Importantly, the 2008 Retail Study explains that there is a need for additional retail and office space. In principle we would support additional office and other B1 type uses plus retail but employment uses should always dominate for the sustainability reasons given above. Retail and office development are likely to present a viable alternative to some of the more industrial type uses.

Consequently, we do not support the phrasing of the third paragraph of Policy H1 and maintain that the most appropriate strategy is to seek renewal of the employment stock with employment based uses and with some new retail development. Removal of employment land uses completely as currently implied-which was the approach adopted in the emerging Hockley Area Action Plan - is not a justifiable strategy.

One of the key tests of a Core Strategy is consistency between policies in the emerging Plan and this strikes at the heart of demonstrating an effective strategy. Policy H1 implies alternative uses to employment and the relocation of Eldon Way to a site identified under Policy ED4. However, Policy RTC6 sets out a suite of policy criteria for Hockley Town Centre which includes employment and commercial activities. In addition Policy ED3 seeks the protection of sustainable employment sites (Eldon Way) and notes that some reallocation of existing employment sites will include a proportion of employment. It notes that in the case of Eldon Way employment development will form a component. The policies appear at odds with one another. The third paragraph of Policy H1 should be deleted as the second paragraph is sufficient to set a strategic context for delivering new housing development. The employment policies and Hockley specific policies should be left to consider the type and quantum of land uses appropriate in the area. If the third paragraph of H1 is to be retained then it should tie in more with Policy RTC6 and in our view explain that employment uses should dominate any redevelopment proposals for the Eldon Way site and that retail and leisure uses should be a supporting proportion.

Implementation, Monitoring and Delivery - page 132 onwards

One of the key tests of soundness is that the Core Strategy should be effective - it should be able to deliver its strategy. The Implementation strategy set out at page 132 onwards of the Core Strategy does not explain how Policy H1, RTC6 and the strategy for redeveloping Eldon Way (Policy ED2 and ED3) will be delivered. The comment at Policy ED3 on

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page 161 identifies it as a potential risk and alludes to land assembly difficulties and the choices to be made by owner/occupiers. In order to deliver the strategy there should be a clear understanding as to whether the new land use values being promoted are sufficient to encourage relocation voluntarily. Secondly there is a need for more information to be gathered and presented to show that current occupiers and landowners are willing to relocate and the timescales likely for this. For example, do the building lease contracts enable early review or are there any break out clauses. There should be some commentary on whether the Council will engage in compulsory purchase orders to pursue their strategy should the 'encouragement' route fail. As currently drafted there is no clear path to deliver the strategy and the danger is that despite reallocation, the sites identified for redevelopment will not come forward in the plan period. In this regard, evidence to satisfy the test of soundness is not provided.

Policy H2 - General Locations

We support the strategy that new housing growth should be targeted at land South of Hawkwell. This area is suitably located to the urban area of Hockley/Hawkwell and to tie in with the settlement tiers on page 40 of the Submission Core Strategy the same terminology for settlement should be used. This ensures a consistency within the SCS. The choice of this location as a housing growth area is appropriate as it would not contribute to the coalescence of the urban area with Ashingdon (there is existing development between this identified housing area at Rectory Road and Ashingdon and moreover, Rectory Road can form a natural physical boundary for the new Green belt boundary. This area is also well located to the existing road network. Cherry Orchard Way has recently been improved and provides much better accessibility to the proposed housing growth area than any other location around Hockley/Hawkwell. The existing bus routes along Rectory Road also make this location sustainable and the additional housing proposed will help underpin the financial viability of bus routes in this area. Locally there are employment opportunities, including the small commercial estate off Main Road. The Eldon Way Industrial Estate adjacent to the Town Centre also provides the opportunity for employment locally. Extensive public open space, play pitches and built leisure facilities are located just to the north of this area and a community hall is located off Briar Close, nearby. The area to the south of Hockley/Hawkwell is close to local shops on the corner of Heycroft Road and Main Road and there are numerous footpath links between this area and the local community including links via Thorpe Road, Thorpe Close, Briar Close, Hawkwell Park and Park Gardens. The area therefore provides the opportunity to enhance existing links, including cycle links, and contribute towards community integration - more so than other sites on the south side of this settlement. The site is also in the control of one house builder and deliverable.

However, we find that the Policy is not fully consistent with national policy and furthermore needs to be reviewed in order to be justified and effective. We have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with this policy and feel that Green Belt review should be more explicit throughout the SCS. We note that it is only Policy H3 which indicates the need for Green Belt land review. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H2 and certainly Policy H3 and Policy GB1 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary.

Policy H2 - Phasing and Quantum

The 2008 Preferred Core Strategy document indicated that the area south of Hawkwell should deliver 330 dwellings over a phasing period to post 2021 (see Policy H2 and H3 of that document). The SCS reduces the quantum of housing in this area to 175 but expects delivery by 2015. At a broader level the Preferred Options Core Strategy of 2008, (Policy H2) required 1,450 dwellings to 2015 and a further 1,050 by 2021. In the SCS the figures are now 775 and 1,010 respectively.

Since the SHLAA post dates the publication of the SCS, we are uncertain as to the reason why such a significant reduction in quantum of housing and extensions to the residential envelope is considered necessary. Presumably it is the 'new' strategy to redevelop existing employment areas within the settlements that has led to this change. Our representations on this strategy and specifically the Eldon Way Industrial Estate are included elsewhere within our representations. Previously we have commented on the Table at paragraph 4.6 of the Submission Core Strategy and the lack of evidence to underpin that table. It seems odd that in the space of a year the expected requirement for Greenfield sites has effectively halved on the basis of a SHLAA exercise. The community is therefore not able to effectively

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comment on the housing land supply and at this stage the Submission Core Strategy is legally unsound.

That said, we are of the view that the quantum of housing envisaged south of Hockley/Hawkwell should be more than the 175 currently envisage. In coming to this view we have reviewed the Urban Capacity Study and the latest housing figures in the Annual Monitoring Report 2008. We conclude that the shortfall in housing land supply is such that 330 dwellings in this location is appropriate.

The recently published SHLAA is based upon the data obtained from the Urban Capacity Study 2007, a call for sites exercise and data from the Annual Monitoring Report 2008.

The 2007 Urban Capacity Study (UCS)

1. 2007 is widely recognised as being the peak level of house prices in the UK and it was acknowledged by Government and practitioners alike that 2007 house prices were at an unsustainable level. It is our view that utilising the 2007 UCS as an evidence base without reference to the market does not pick up the depressed demand that is likely to now exist. Recent corrections to the housing market now mean that housing land prices are at a much lower and arguably more affordable level than before. The implications are that some pdl may not be viable for housing development. Often brownfield sites have much higher development costs than Greenfield sites and so the yield from urban capacity will be much lower than anticipated in the 2007 study. One example is the employment allocation of the Adopted Local Plan located at 76-92 Main Road, Hawkwell. This site has been allocated for several years and has been available during the most recent rises in residential property prices during 2006-07. As a consequence the lack of progress on the site can only be described by its current occupancy and perhaps it comprises high value uses that do not encourage redevelopment. Despite this the site is identified as having high potential for alternative use and high potential demand. The SHLAA form notes that there is no information on legal constraints (e.g., tenancy agreements) As a consequence it is difficult to see how this could continue to be a potential site and as a consequence the allowance for green field releases should be increased.

2. There are considered to be other instances in the UCS and the recently published SHLAA where the assumptions and calculations would indicate that the 1301 urban capacity figure is over optimistic and the SHLAA assessment is limited. In the assessment of 'non-residential sites in appropriate locations' within the UCS assumptions are made as to the probability of sites coming forward for new housing. 68-72 West Street, Rochford is identified as a high probability site but we note that it has been subject to 7 refusals of planning permission/conservation consent. There is a significant gap between the urban capacity identified as being suitable by the Council and the capacity applied for by the owners. Given its alternate use value, it is debateable whether the two capacity figures can be reconciled. No 247 London Road is another example of a site allocated in the Local Plan but which hasn't come forward. This is now the subject of a proposal for a care home and if approved would further limit the scope for market/affordable housing capacity on the site. A striking example of how the urban capacity study has underestimated is also evidence by 2-4 Alderman's Hill, Hockley - described as a disused service station. There has been no residential development application on this site since 2004 and most recent applications have sought commercial use of the site. Rather than being evidence of housing land deliverability, this particular site evidences the need for commercial uses in the area. There are therefore deliverability doubts over these 'high probability' categories which amount to some 40 units.

3. In relation to the assessment in the UCS entitled 'intensification of existing residential uses' we note that the assessment is premised on an assessment of recent trends taking into account net completions between 2001-2006 and 2005-06. This is effectively an assessment of windfall trends and not an approach that PPS3 encourages. Importantly Table 3-12 in the urban capacity study seeks to project forward urban capacity from residential redevelopment - a period that benefited from high house prices and PPG3 guidance encouraging redevelopment. These two circumstances have markedly changed and so the assumptions and conclusions drawn would also have changed. Even taking into account the UCS discounting, the reliability of the 404 units from this source must be questioned and in our view the 1301 figure cannot be a sound basis for urban capacity and further Greenfield releases are necessary.

4. In the section of the UCS entitled 'subdivision of dwellings' and 'living above the shop' it is estimated that recent trends would result in 7 and 15 units. Our concerns with using trends as a basis for urban capacity are detailed above - PPS3 does not encourage this. Rather, local authorities are charged with surveying their areas, identifying which areas may yield urban capacity and how much and developing policies to achieve that. Government guidance does not encourage the estimation of windfalls in the way the UCS does.

5. Redevelopment of established employment land is a separate section within the UCS. At 1 above we identify the low probability of the Main Road residential allocation coming forward. This remaining section of the UCS considers 11 further employment sites which were first identified in the 2000 UCS. Three of these are considered to have a high probability of coming forward. We have looked at these three sites and can find no evidence that they are likely to come forward. In the 8 years between 2000 and 2008 the three identified high probability employment sites have not been developed and there is no reason to assume that the next 5-10 years will be any different. For example the Rawreth Industrial Estate is identified as being well used in the UCS and although it has some unneighbourly uses there is no indication that the site is available, suitable or deliverable for residential. Land between 39-69 Lower Lambricks, Rayleigh is identified as having a high probability of residential uses. Yet there is no

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evidence of any pre-application advice or planning applications for this area. Stambridge Mills, Mill Lane, Stambridge is a further example. This site is separated from the urban area, in a flood risk zone and protected in the 2006 Replacement Local Plan by Policy EB9 which promotes B1 uses. Against this background there is only two relevant planning applications affecting this area both date from the early 1990's and relate to a plant room and loading bay. There is no evidence that this is likely to come forward for residential purposes in the next 5-10 years.

6. In the UCS extant permissions are identified as 856 dwellings. It is important to note that this figure needs to be continually reassessed so that from the point of adoption of the Core Strategy a 5 and 10 year housing land supply is available. The SHLAA notes extant permissions for 2009-14 being 106. As noted below extant permissions do not necessarily translate into deliverable sites. There is therefore a contingency that needs to be built in. Further allocations on greenfield land need to be increased and as such the quantum of housing in the area south of Hockley/Hawkwell should be increased to 330 dwellings in order to begin to meet the shortfall identified.

The District Council's 5 year housing supply assessment

7. The District Council's Annual Monitoring Report ("AMR") 2008 purports to demonstrate a 5 year housing land supply. The preamble to Table 4.10 in the AMR 2008 explains that Rochford District Council ("RDC") has included units under construction, units with full permission, units with outline permission, units with a resolution to grant, units subject to preapplication discussion/Urban Capacity Assessment and land allocations in its trajectory. The reader is referred to Appendix B which breaks down the sites in more detail. The recently published SHLAA also includes a table showing a potential 1273 dwellings deliverable. However, it refers to "appropriate brownfield sites." Since these 'appropriate sites' are do not benefit from an application or a planning permission it is difficult to programme them into the housing delivery trajectory.

8. In the full planning permission category of the AMR 2008 where work has not yet started there can be no guarantee that all these sites will be delivered in the 5 years. This comment relates to the one above in relation to the recently published SHLAA. It is not uncommon for permissions to be obtained to provide a means for valuing a site where the owner has no immediate plans to sell the site or develop housing. Delivery may also be hampered by funding constraints, or site assembly problems (where sites are in an alternative use or relocation constraints). Appendix B of the AMR 2008 does not set out the intentions of the landowner or whether the sites are truly achievable in the 5 year period as per PPS3 requirements. The SHLAA purports to show developer intentions at Appendix C but the assessment by the local authority into the legitimacy of some of the claims is not presented. The evidence base is not as full as it should be to demonstrate the robustness of Table 4.6 of the SCS. It is also unclear the extent to which this table is based on either the UCS 2007, AMR 2008, SHLAA 2009 or a combination of all three. This should be set out clearly.

9. In addition, to the 'non delivery' of a proportion of new homes in the AMR 2008, there is concern at the timings of delivery in that data set, for example, 10 units in 2008-2009 relates to outline planning permissions and it is doubtful whether reserved matters can be turned round quick enough to begin delivering housing in this year period. There could well be examples in that set of data where the delivery of units in the first year of the 5 is unlikely, thus delivery is reduced for that period and pushed back and this process is then compounded throughout the data set up to and beyond year 5. Statistical evidence from the Department of Communities and Local Government ("CLG") reveals that building starts are 43% down on the quarter to March 2009 compared with March 2008. It is not clear whether the recently published SHLAA has taken this into account and unless it does the data in the Table at 4.6 of the SCS cannot be relied upon, particularly given the current recessionary circumstances. In relation to the Table at Paragraph 4.6 a refinement is therefore needed to take into account this effect on phasing.

10. This problem is compounded for other units relied upon where permission has been granted but no start on site has been made; this accounts for a considerable number of sites in 2009-10 period (100 dwellings) which is (year 2 of the 5 year period). A delay in these will require more Greenfield sites to be identified in order to meet the shortfall.

11. Finally we note that the East of England Plan expresses its land supply requirement as a minimum. This strategy is not reflected in the

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Submission version of the Core Strategy policy H2.

12. In summary since neither the UCS nor the Annual Monitoring Report form a SHLAA, reservations are maintained about the degree to which sufficient housing land has been identified.

Policy H3

In the Preferred Options Core Strategy 2008 more locations were identified for housing growth in the post 2021 phase. Whilst it is our view that land south of Hockley/Hawkwell should benefit from a greater number of dwellings than the 175 currently identified (330) in order to make the strategy effective. We are concerned at the significant change in strategy between the Preferred Option Core Strategy and the Submission version, which has significantly less housing growth on green field sites. This change in strategy is so significant that we would question whether it is appropriate in the context of soundness and the consultation processes that have taken place so far.

We also have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with other policies in the SCS and feel that Green Belt review should be more explicit throughout the SCS. As it currently stands there is a potential conflict with national policies and limited justification for the Green belt strategy. We note that in Policy H3, which indicates the need for Green Belt land review, the advice is limited and unclear. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H3 and Policy GB1/H2 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary. Not to do so is unsound for justification and effectiveness reasons.

Policy H4 - Affordable Housing

As currently drafted we feel that the policy is not concise enough and that the policy does not reflect current guidance. The phrase 'at least' would indicate that in most cases affordable housing above 35% will be sought. Our understanding is that the 35% figure is recommended in the SHMA and that to provide a policy framework which seeks to go beyond that figure would potentially be unworkable as many sites could not financially bare the burden of over a third of the net developable area not yielding a value. The policy should be redrafted so that "a target of 35% affordable housing shall be provided on all developments of 15 or more units..."

The last policy paragraph provides some scope to relax this policy, if there are clear site constraints that make on site provision impossible. The policy, though, is not particularly clear on what would constitute exceptional circumstances. For example, physical site constraints, which unusually raise development costs, would be one such reason and this should be specified. There may be other reasons including the nature of housing needs in the part of the District the site is located which justify affordable housing below the 35% target. Design reasons may also have a bearing on how provision is made and in what form, particularly if the site is in an historic area where design might override housing need argument. It is therefore recommended that the policy expand on the type of circumstances where affordable housing may be relaxed and the type of information that will be sought of applicant's who have a need to invoke this part of the policy.

Policy H5

In support of the policy, it is advantageous that no percentages requiring a specific mix are included. This flexibility will enable developers and the Council to respond directly to changing circumstances in the local housing market. In the past some authorities have set out a percentage for the type of housing they require only to find that after a few years of strict implementation there is an oversupply of property of that type and no flexibility in the policy to address the problem.

Policy ED2 - London Southend Airport

It is considered that to grow non aviation related employment at a location north of Southend Airport where sustainable access from the rest of Rochford District requires careful consideration. Most Airports are serviced by aviation related employment development and as such a location close to the airport is sensible and sustainable. However, for surface access reasons it would be inappropriate to encourage travel from Rochford's main settlements to what essentially

Core Strategy Submission Document

S - 16929 - 10009 - Policy CLT1 - Planning Obligations and Standard Charges - None

16929 Support

CHAPTER 9 Policy CLT1 - Planning Obligations and Standard Charges

would be a rural location for general employment uses. Whilst sustainable access would be improved by a railway station and better bus links, there is no evidence to suggest that a sustainable surface access strategy for non related employment development at the Airport can be achieved. Paragraph 11.22 explains the critical importance of a railway station to the delivery of the strategy yet the Transport Chapter and Implementation Chapter provide neither a policy nor an assessment of deliverability. It is also notable that the South Essex Rapid Transit Policy T4, as set out at paragraph 10.16, notes that Rochford is not proposed to be served but may be served in future phases. This uncertainty is no way to plan for a major employment land supply strategy in the District. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley/Hawkwell, Rochford and Rayleigh is unsound.

Policy ED3

We fully support the first sentence of the Policy and note the apparent contradiction with the statements in Policy H1 and elsewhere which seeks to develop on alternative uses at industrial estates such as Eldon Way.

This contradiction is evidence in the second paragraph of Policy ED3. In our representations on Policy H1 we have explained why it is not sound to diminish the employment stock at Eldon Way and the importance of maintaining a dominance of employment type uses at this estate. These arguments are not repeated here.

We note the sentiments of the third paragraph and in accordance with our representations elsewhere are of the view that this sentence should be revised to explain that Eldon Way will accommodate principally employment type uses. As noted elsewhere uses which are an alternative to employment would diminish this highly sustainable employment site and this is unsound when assessed against National Policy.

Policy ED4 - Future Employment Allocations

In part, the de-allocation strategy is not supported as it is considered unsound when set against sustainability criteria. In relation to the Eldon Way Industrial Estate it is considered critical to the ongoing sustainability of this settlement that employment uses are maintained at this location. It is close to the railway station, bus routes and local residential areas from which the opportunity exists for employees to walk or cycle to work. Its location adjacent to the Town Centre offers opportunity for some retail and leisure development to complement the centre and to maintain a supporting function. These sustainable benefits would not occur with the deallocation of Eldon Way or the significant erosion of its employment floorspace. Whilst redevelopment of the employment site to achieve new employment is supported, the dominant land use should continue to be employment use. As a consequence, the 18ha of land required for employment in this policy is considered to be excessive and the policy should be reviewed to explain that redevelopment of existing employment sites for primarily new employment development will be encouraged.

Policy T4

It is noted that the South Essex Rapid Transit policy, as elaborated upon at paragraph 10.16 notes that Rochford is not served but may be served in future phases. This uncertainty is contrary to the delivery principles of soundness and directly puts at issue the employment land supply strategy in the District which is founded on sustainable access to new sites. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley, Rochford and Rayleigh is unsound.

Appendix H1, CTL1 - Infrastructure

It is recognised that necessary infrastructure provision is an important part of creating a sustainable development and in that context appendix H1 is supported. The supporting text notes that the table at Appendix H1 is not exhaustive and in that context it is very important that the framework properly distinguishes between what should be provided as part of new development schemes and what shouldn't. It is therefore essential that the framework acknowledges the importance of Circular 05/05 and the tests which say that provision of infrastructure and/or contributions should be:

- * Relevant to planning
- * Necessary to make the proposed development acceptable in planning terms
- * Directly related to the proposed development
- * Fairly and reasonably related in scale and kind to the proposed development
- * Reasonable in all other respects

As is made clear (Paragraph B9 of Circular 5/05) contributions should not be used to make good existing deficiencies in infrastructure provision. Nor are they to be used to secure contributions to the achievement of wider planning objectives that are not necessary for consent to be granted. In that context the Core Strategy should set this out as its policy framework.

Policy GB1 - Green Belt

Core Strategy Submission Document

S - 16929 - 10009 - Policy CLT1 - Planning Obligations and Standard Charges - None

16929 Support

CHAPTER 9 Policy CLT1 - Planning Obligations and Standard Charges

The objectives of this policy are supported, although as noted in other representations the SCS is unsound as it does not meet the tests in relation to justification, compliance with national policy or effectiveness of strategy.

Policy GB1 mentions the objective to allocate the minimum amount of Green Belt land necessary. The policy should link to the requirements of PPG2 and RSS which are discussed in relation to the representations on Policy H2 and H3. The policy should set out a timeframe for the review and why Rochford requires a Green Belt review (what the exceptional circumstances are in this District that justify a review of local boundaries. The policy should be amended to set out a 2031 time frame and this may require the SCS to have an extended life span beyond 2021.

We would recommend the deletion of the word character since Green Belt designation is not related to landscape character as currently drafted. For clarity we would also recommend that the Policy or its supporting text explain that a Green Belt review will take place in support of an allocations document (paragraph 6.6) in order to identify an appropriate new boundary. This is particularly necessary given the commitment to a Green belt review in the adopted Local Development Scheme.

Policy CLT1 - Planning Obligations and Standard Charges

In view of the need to test fully the basis on which standard charges are based it is important that any document produced is in a development plan document that enables an examination in public. The policy should explain this in order that when the document is produced it accords with Policy and is based on sound evidence.

ENV9 - Code for Sustainable Homes

Object. The advice from the Department of Communities and Local Government is that the new requirement to have a rating against the Code does not make it mandatory to build a Code home or to have each new home assessed against the Code. It does however mean that all buyers of new homes be given clear information about the sustainability of the new home. A house builder can do this in one of two ways:

- they can choose to build a Code home, have that home assessed against the Code and provide the home buyer with a Code certificate stating the star rating the home has achieved
- or, they can choose to build to current building regulations standards, not to pay for an assessment and instead download a nil-rated certificate of non-assessment (also referred to as a nil-rating) to provide to the home buyer.

As such the Rochford policy requirement that coding 3 be achieved by 2010 and Code 6 by 2013 is out of step with Government advice. The policy wording should explain that it is just the coding that is a requirement of new homes and not necessarily that new homes should be constructed to achieve a standard.

The current Government objectives are for the code to be introduced over a reasonable period with development to be code 3 by 2010, code level 4 by 2013 and code level 5 by 2016. In this regard the policy, as drafted, seeks to achieve code 6 by 2013 and consequently compresses the code requirements into a shorter time scale with the costs associated expected to be subsumed within the housing market through higher prices. This is not a realistic strategy for the delivery of sustainable homes and we consider that the policy should be revised to extend the period of compliance but to also make it more flexible based on local circumstances.

Research undertaken on behalf of the Housing Corporation and English Partnerships, published in February 2007 'A cost review of the code for sustainable homes' reveals that code 6 is unlikely to be unattainable given existing technologies and that achieving code 5 could result in a 12% to 20% increase in costs that would have to be passed onto the consumer. Given the variability of the housing market with peaks and troughs, it is unlikely that the housing market would be able to subsume this level of price increase.

The code system policy as currently drafted does not have regard to site circumstances and so many of the requirements could be difficult to meet. For example, micro electricity generation on site may be difficult to achieve where local circumstances deter the capture of wind or solar power. If more expensive technologies are required to generate power than is the norm then costs will rise. There may be other competing reasons why designs cannot include certain sustainability measures if housing sites are in sensitive landscape and historic locations. Alternatively there may be significant development costs associated with site specific circumstances and so viability of the site's development becomes a valid consideration. By insisting on the code for sustainable homes other policy objectives such as affordable housing at particular rates and other contributions may need to be reconsidered. Consequently, we are of the view that this policy should be drafted in a manner which enables site specific circumstances to be taken into account. As noted above the Government explains that the code is a certification requirement and does not necessarily mean that buildings are constructed in accordance with a code level.

It is also important to note that it is not the purpose of planning legislation to duplicate other legislation. In this regard, the policy should accept that the Building Regulations will be the main vehicle for implementing this policy and that unless the coding requires external development then there will be no need to specify what is to be carried out in a planning application.

Core Strategy Submission Document

S - 16929 - 10009 - Policy CLT1 - Planning Obligations and Standard Charges - None

16929 Support

CHAPTER 9 Policy CLT1 - Planning Obligations and Standard Charges

Summary: Policy CLT1 - Planning Obligations and Standard Charges

In view of the need to test fully the basis on which standard charges are based it is important that any document produced is in a development plan document that enables an examination in public. The policy should explain this in order that when the document is produced it accords with Policy and is based on sound evidence.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16245 - 8065 - Education, 9.9 - i, ii, iii

16245 Object

CHAPTER 9 Education, 9.9

Respondent: Bull Lane Development Group (Mrs Pamela Watson Jones) [8065] **Agent:** N/A

Bull Lane Development Group
68 Windermere Ave
Hullbridge
Essex
SS5 6JT
U K
01702 232376

Full Text: By building in the proposed London Road Rayleigh, a new school will have to be built - at a cost, this is unnecessary when there is adequate education facilities elsewhere.

Summary: By building in the proposed London Road Rayleigh, a new school will have to be built - at a cost, this is unnecessary when there is adequate education facilities elsewhere.

Change to Plan Change the preferred site, as shown by the previous application Land at Bull Lane, Rayleigh allows children to attend ALL local schools without the high development costs other sites will bring.

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

S - 15939 - 9032 - Education, 9.12 - None

15939 Support

CHAPTER 9 Education, 9.12

Respondent: Essex Chambers of Commerce (Mr John Dallaway) **Agent:** N/A
[9032]

Essex Chambers of Commerce
2nd Floor,
Viscount House,
London Southend Airport, Southend-on-Sea.
Essex.
SS2 6YF
01702-560100

Full Text: The production of travel plans for schools is regarded as essential as this should help to relieve traffic congestion for the movement of goods and services during the morning peak travel time. Research by the British Chambers of Commerce has consistently shown that the "school run" is the main cause of traffic congestion with the resultant extra costs to business.

Summary: The production of travel plans for schools is regarded as essential as this should help to relieve traffic congestion for the movement of goods and services during the morning peak travel time. Research by the British Chambers of Commerce has consistently shown that the "school run" is the main cause of traffic congestion with the resultant extra costs to business.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 15954 - 10849 - Policy CLT2 - Primary Education, Early Years and Childcare Facilities - None

15954 Support

CHAPTER 9 Policy CLT2 - Primary Education, Early Years and Childcare Facilities

Respondent: Canewdon Parish Council (Mrs Kelly Holland) **Agent:** N/A
[10849]
Canewdon Parish Council
33 Rowan Way
Canewdon
Essex
SS4 3PD

Full Text: Concerns regarding the capacity of the current primary school on the village.

Summary: Concerns regarding the capacity of the current primary school on the village.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16051 - 14107 - Policy CLT2 - Primary Education, Early Years and Childcare Facilities - None

16051 Support

CHAPTER 9 Policy CLT2 - Primary Education, Early Years and Childcare Facilities

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: Disagree with primary school allocation in West Rochford - also see our comments under URV1. Parking facilities for cars and public transport have in the past been badly thought out. We must ensure better provision in future.

Summary: Disagree with primary school allocation in West Rochford - also see our comments under URV1. Parking facilities for cars and public transport have in the past been badly thought out. We must ensure better provision in future.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16123 - 7984 - Policy CLT2 - Primary Education, Early Years and Childcare Facilities - i

16123 Object

CHAPTER 9 Policy CLT2 - Primary Education, Early Years and Childcare Facilities

Respondent: Hockley Parish Plan Group (Mr T Gleadall) [7984] **Agent:** N/A

Hockley Parish Plan Group
2 Wood End
Hockley
Essex
SS5 4QL
01702 202892

Full Text: HPPG believes that there is not enough availability of school places with the proposed redevelopments of Eldon Way for residential purposes

Summary: HPPG believes that there is not enough availability of school places with the proposed redevelopments of Eldon Way for residential purposes

Change to Plan Eldon Way redevelopment for housing was not included in the 2008 version

Appear at exam? No **Soundness Tests** i

Core Strategy Submission Document

O - 16155 - 9823 - Policy CLT2 - Primary Education, Early Years and Childcare Facilities - i

16155 Object

CHAPTER 9 Policy CLT2 - Primary Education, Early Years and Childcare Facilities

Respondent: mr alistir matthews [9823]

Agent: N/A

telfords farm
chelmsford road
battlesbridge
wickford
SS118TR
uk
01268732069

Full Text: There has recently been a relocation of a primary school onto the park site with provision for expansion .Essex County Council predict a surplus of primary school provision in Rayleigh even after the predicted population increase .This suggests that provision will be in the wrong place and that an existing school in the east may well be closed. This is a waste of resources better to relocate some of the housing in the east .

Summary: There has recently been a relocation of a primary school onto the park site with provision for expansion .Essex County Council predict a surplus of primary school provision in Rayleigh even after the predicted population increase .This suggests that provision will be in the wrong place and that an existing school in the east may well be closed. This is a waste of resources better to relocate some of the housing in the east .

Change to Plan Proper consultation with County Education Authority is necessary .Wherever possible development should be spread through the town and Rawreth village itself to reduce the necessity to develop the high grade agricultural land.

Appear at exam? No

Soundness Tests i

Core Strategy Submission Document

S - 16234 - 8650 - Policy CLT2 - Primary Education, Early Years and Childcare Facilities - None

16234 Support

CHAPTER 9 Policy CLT2 - Primary Education, Early Years and Childcare Facilities

Respondent: Countryside Properties (Southern) Ltd (Mr Steve Price) [8650] **Agent:** N/A

Countryside Properties (Southern) Ltd
Countryside House
The Drive
Brentwood
Essex
CM13 3AT
01277260000

Full Text: Whilst we do not object to the allocation of a 1.1 ha site on land to the west of Rayleigh for a Primary school, it must be made clear that the level of contribution we make towards such a facility should be reasonably related to the impact of any development of the land. Circular 5/05 and the emerging/published DCLG guidance on the use of CIL, makes it clear that new developments/contributions from new development can not be used to resolve existing deficiencies (only, proportionally, those deficiencies made worse by new development).

Summary: Whilst we do not object to the allocation of a 1.1 ha site on land to the west of Rayleigh for a Primary school, it must be made clear that the level of contribution we make towards such a facility should be reasonably related to the impact of any development of the land. Circular 5/05 and the emerging/published DCLG guidance on the use of CIL, makes it clear that new developments/contributions from new development can not be used to resolve existing deficiencies (only, proportionally, those deficiencies made worse by new development).

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16701 - 9072 - Policy CLT2 - Primary Education, Early Years and Childcare Facilities - i

16701 Object

CHAPTER 9 Policy CLT2 - Primary Education, Early Years and Childcare Facilities

Respondent: Essex County Council (Mr Roy Lewis) [9072] **Agent:** N/A

Essex County Council
ESH - Spatial Planning
Planning and Transport
County Hall
Chelmsford
CM1 4JU
01245-437578

Full Text: ROCHFORD CORE STRATEGY SUBMISSION DOCUMENT, SEPTEMBER 2009
RESPONSE OF ESSEX COUNTY COUNCIL

1. General Comment

Essex County Council welcomes and broadly supports the Core Strategy prepared by Rochford District Council. The Strategy contains policies and proposals that address the spatial characteristics, issues and opportunities facing the District whilst respecting the distinctive qualities of the different settlements and parts of the District.

The County Council fully supports the maintenance of a strong policy approach to protection of the Green Belt and of the quality of environmental assets in the District whilst making adequate housing and employment provision within the District. The Core Strategy presents an approach that emphasises a balance of opportunity through the District and recognition of emerging economic prospects in the District and neighbouring areas. The intended preparation of more detailed Action Area Plans for London Southend Airport and its environs and for each of the three town centres of Rayleigh, Rochford and Hockley will further enhance the approach of the Core Strategy. The emphasis on the three town centres is particularly welcomed as offering a stimulus to improvement in the services and facilities available locally within the District whilst also affording possibilities of increased community focus.

2. Housing Distribution and Locations

The East of England Plan requires Rochford to provide a minimum of 3,790 additional dwellings between 2006 and 2021. In addition, provision for a further 1,000 dwellings should be made between 2021 and 2025 to ensure delivery of housing for at least 15 years from adoption of the Core Strategy (expected in 2010). Of this total requirement the District Council has identified a capacity of 2,000 dwellings through a Strategic Housing Land Availability Assessment. This means that the Core Strategy has to identify locations for about 1,750 dwellings to be delivered before 2021 and a further 1,000 dwellings between 2021 and 2025.

Policy H1 (The efficient use of land for housing) is supported. However, prioritisation of the reuse of previously developed land within settlements for additional housing is unlikely to provide a sufficient source of provision due to the generally residential nature of existing settlements in the district and the absence of potentially large sites of previously developed land. The assessment of potential for additional housing provision within settlements already includes the proposed re-allocation to substantially residential use of 4 existing employment areas.

Within Policy H2 (Extensions to residential envelopes and phasing) and Policy H3 (Extension to residential envelopes post-2021) the District Council has adopted a balanced approach to the distribution of additional housing locations, which is based on identification of tiers of settlements defined by reference to their accessibility to jobs, services and facilities (some of which lie outside the District) and the need to protect the valued environments within the District. This approach is generally supported, although implementation and delivery of individual schemes should give further thought to securing sustainable functional relationships between proposed development locations and availability of jobs, services and facilities.

The proposed scale and phasing of development at each of the identified locations in Policy H2 and Policy H3 should be capable of being supported by County Council service groups, provided that adequate and timely funding is available. The County Council would wish to work with the District Council to ensure that future infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

3. Economic Development

The approach to Employment Growth (Policy ED1) is supported. Given the economic structure of Rochford District the support to be given to protection and enhancement of the role of small and medium sized businesses; enhancement of the District's commercial centres; and development of a skills training academy is particularly welcome. These measures will assist in building on the existing economic resource of the District.

Proposals for the comprehensive development of London Southend Airport and its environs (Policy ED2) are supported.

Core Strategy Submission Document

16701 Object

CHAPTER 9 Policy CLT2 - Primary Education, Early Years and Childcare Facilities

The further elaboration of proposals through an Area Action Plan will provide a firm foundation to realise the economic regeneration and growth opportunities presented by effective use of the Airport. The recognition of the potential environmental impact of the Airport and the commitment to work to mitigate any adverse impacts on the environment and local amenities is fully supported.

The location of the proposed Eco-Enterprise Centre to the North of London Southend Airport (Policy ED4) is supported. Creation of the Centre would assist reduction of the rate of business start-up failure in the district. Further the proposed location for the Centre would afford a clear offer to businesses within an area of varied business activity.

The continued protection and enhancement of existing employment land (Policy ED3) is supported, as is the identification of 4 existing employment sites for appropriate alternative, substantially residential, uses. Each of the 4 sites affords particular issues and opportunities whereby their redevelopment for other uses and relocation of existing occupiers would confer advantage for the immediately neighbouring areas and for the District as a whole.

4. Town Centres

The town centres of Rayleigh, Rochford and Hockley, and future plans for them, are closely linked to the economic development of the District but also present the opportunity to offer greater community focus within the District. The varied approach being taken to each of these town centres is supported (Policy RTC4, RTC5 and RTC6), notably the recognition of the role and purpose of the town centres beyond retail uses.

The contribution that the County Library service could make to plans for the town centres should not be overlooked. The 5 libraries in the District are substantial footfall draws in their localities and act as a 'community anchor store'. This has knock-on effects in encouraging use of neighbouring retail and service facilities. Further the Library service is currently looking at co-location opportunities for other services within the libraries which would enable them to act as a community focus.

5. Transport

The transport aspects of the Core Strategy are well balanced in identifying potential measures that would meet the needs of existing residents and businesses in the District as well as needs arising from future development. The approach reflects and makes good reference to the transportation aspirations of the County Council. The policy emphasis on close working between the District Council and the County Council to advance the transport aspirations is welcomed and fully supported.

In relation to parking standards (Policy T8 and Paragraph 10.30) the review undertaken by Essex County Council in conjunction with the Essex Planning Officers Association has now been completed. Revised parking standards have been agreed and signed off as County Supplementary Guidance, in accordance with PPS12, and is being applied by the County Council as Local Highways Authority.

6. Coastal Protection Belt

Policy ENV2 (Coastal Protection Belt) is not supported because in its current form it is not a suitable or effective replacement policy for Policy CC1 of the Replacement Structure Plan. Structure Plan Policy CC1 (The Undeveloped Coast - Coastal Protection Belt) currently remains a 'saved' policy of the Essex and Southend-on-Sea Replacement Structure Plan, April 2001 (following a direction of the Secretary of State, dated 27th September 2007, under paragraph 1(3) of Schedule 8 to the Planning and Compulsory Purchase Act 2004). The existing Policy CC1 reads, 'Within the Coastal Protection Belt defined in adopted local plans there shall be the most stringent restrictions on development within the rural and undeveloped coastline situated outside existing built-up areas, and any development which is exceptionally permitted within this Belt shall not adversely affect the open and rural character, historic features or wildlife.'

Core Strategy Policy ENV2 should be revised to include specific reference to,

- * Definition of the boundary of the Coastal Protection Belt in another Development Plan Document;
- * the application of the most stringent restrictions on development within the rural and undeveloped coastline;
- * any development exceptionally permitted not adversely affecting the open and rural character, historic features or wildlife.

7. Historic Environment

The importance of the historic environment in Rochford District is clearly identified within the Core Strategy document. Nevertheless, the policy guidance could be usefully enhanced to promote consideration and enhancement of the historic environment and use of the historic environment to shape place. This would be achieved by the following amendments to the Core Strategy,

- * Policy ENV1 (Protection and Enhancement of the Natural Landscape and Habitats and the Protection of Historical and Archaeological Sites) should be amended by deletion of the final sentence and its replacement with, The Council is committed to the protection, promotion and enhancement of the diverse historic landscape and extensive surviving archaeological deposits of the District.

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16701 Object

CHAPTER 9 Policy CLT2 - Primary Education, Early Years and Childcare Facilities

* Paragraph 8.15 of the supporting text should be amended to better support the suggested amendment to Policy ENV1. The existing text of Paragraph 8.15 should be deleted in its entirety and replaced by,
The historic environment of Rochford District has developed through a history of human activity that spans over 450,000 years. Much of the resource lies hidden beneath the ground in the form of archaeological deposits. Other elements such as the historic landscape, the pattern of field, farms, woods and grazing marsh which characterise the District, are a highly visible record of millennia of agriculture, industry and commerce. Of particular significance are the coastal, island and estuarine areas where multi-period landscapes reflecting the exploitation of coastal and marshland resource survive. The District also includes the important historic medieval market towns of Rochford and Rayleigh.

* Page 16 (Sustainable Community Strategy Priority: Promoting a Greener District) should be amended to further support the approach to the Historic Environment. The fourth bullet of the Key Section/Policies of the Core Strategy should be amended to include the word 'historic', so that the first sentence of the bullet would read,
The Environment chapter seeks to protect and enhance the biodiversity, historic and natural environment of the District by protecting sites of local, national and international importance.

8. Community Infrastructure

The approach to Community Infrastructure is supported. The County Council would wish to work with the District Council to ensure that future community infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

In addition, it should be noted that,

* Some County Council services are not highly visible despite being regarded as highly desirable community services by local residents. The need to ensure adequate funding and contributions to enable these services to meet community expectations should be recognised and acknowledged in consideration of planning obligations and standard charges.

* The Adult Community Learning Centre at Rocheway, Rochford could be better located with regard to the wider Rochford/Castle Point area of service. Relocation of the Centre could provide opportunities both at the new location and for the current site.

* The Core Strategy should make specific reference to,

o Appendix H1, Location at South Canewdon: new Early Years and Childcare facilities;

o Policy CLT2, final sentence: insert after the words 'primary schools' the words 'and Early Years and Childcare facilities';

o Appendix CLT1, Other issues/comment: for Early years and childcare facilities add 'Land to be allocated within new residential areas, as appropriate'.

9. Implementation, Delivery and Monitoring

The inclusion in the Core Strategy of a section considering Implementation, Delivery and Monitoring is welcomed and supported. Nevertheless, the District Council, in moving towards implementation and delivery of the individual elements of the Core Strategy, should highlight those schemes and projects that are critical to achievement of other aspects of the Strategy.

Further, the monitoring proposal for Policy H6 (Lifetime Homes) and for Policy CP1 (Design) should be amended,

* Policy H6 (Lifetime Homes) - the identified monitoring tool is Core Indicator H6 Housing Quality Building for Life Assessments. The Building for Life Assessment methodology was devised to measure the overall design/layout quality of housing developments. It was not devised to measure compliance with Lifetime Homes, which is largely, but not exclusively, concerned with internal space standards and the provision of internal arrangements within dwellings to meet needs of all residents.

* Policy CP1 (Design) - the monitoring indicator proposed by the Core Strategy is not supported because it is unclear what the indicator would actually be measuring. The proposed indicator should be replaced by the Core Indicator, Housing Quality - Building for Life Assessments, as suggested by the County Council in its response to the Core Strategy Preferred Options, October 2008. A better approach would be to base evaluation and monitoring of Policy CP1 on the Commission for Architecture and the Built Environment's (CABE) 20 Building for Life principles, particularly as Government has endorsed these principles and is urging local authorities to use them to assess design quality. It is suggested that the monitoring arrangements for Preferred Option CP1 be deleted and replaced by the following text, 'The success of the implementation of this policy will be monitored by assessing schemes, or an appropriate sample of schemes, against the Commission for Architecture and the Built Environment's (CABE) Building for Life principles.'

10. Access to Housing

The Core Strategy notes the higher prevalence of older people in Rochford District and the need to support them. However, a more broadly based approach to access to housing should be adopted by Policies H4, H5 and H6. It should recognise the presence of other vulnerable adults in the community, for example, those with learning or mental health disability, and the range of possible forms of accommodation, including supported, sheltered and extra care accommodation. The high level of owner occupation in the District further emphasises the need for a broader approach. The emphasis on Lifetime Homes would not address the variety of future needs, whilst the potential exemptions to the

Core Strategy Submission Document

O - 16701 - 9072 - Policy CLT2 - Primary Education, Early Years and Childcare Facilities - i

16701 Object

CHAPTER 9 Policy CLT2 - Primary Education, Early Years and Childcare Facilities

Summary: Lifetime Homes policy standard in Policy H6 are likely to act against demographic trends. The approach to Community Infrastructure is supported. The County Council would wish to work with the District Council to ensure that future community infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

In addition, it should be noted that,

* Some County Council services are not highly visible despite being regarded as highly desirable community services by local residents. The need to ensure adequate funding and contributions to enable these services to meet community expectations should be recognised and acknowledged in consideration of planning obligations and standard charges.

* The Adult Community Learning Centre at Rocheway, Rochford could be better located with regard to the wider Rochford/Castle Point area of service. Relocation of the Centre could provide opportunities both at the new location and for the current site.

The Core Strategy should make specific reference to, Policy CLT2, final sentence: insert after the words 'primary schools' the words 'and Early Years and Childcare facilities;

Change to Plan The Core Strategy should make specific reference to,

Policy CLT2, final sentence: insert after the words 'primary schools' the words 'and Early Years and Childcare facilities;

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16818 - 9676 - Policy CLT2 - Primary Education, Early Years and Childcare Facilities - i, ii, iii

16818 Object

CHAPTER 9 Policy CLT2 - Primary Education, Early Years and Childcare Facilities

Respondent: Bellway Homes [9676]

Bellway Homes
Bellway House
Bury Street
Ruislip
Middlesex
HA4 7SD
UK

Agent: Barton Willmore LLP (Mr E Hanson) [14266]

Barton Willmore LLP
7 Soho Square
London

W1D 3QB

020 7446 6888

Full Text:

See statement

Council ref AE18 and AE18a

Summary:

See statement

Council ref AE18 and AE18a

Change to Plan

See statement

Council ref AE18 and AE18a

Appear at exam? Yes

Soundness Tests i, ii, iii

Core Strategy Submission Document

S - 15955 - 10849 - Policy CLT3 - Secondary Education - None

15955 Support

CHAPTER 9 Policy CLT3 - Secondary Education

Respondent: Canewdon Parish Council (Mrs Kelly Holland) **Agent:** N/A
[10849]

Canewdon Parish Council
33 Rowan Way
Canewdon
Essex
SS4 3PD

Full Text: Will extra transport be provided to the secondary schools?

Question the policy regarding the catchment areas for students in the village who are transferring to secondary education.

Summary: Will extra transport be provided to the secondary schools?

Question the policy regarding the catchment areas for students in the village who are transferring to secondary education.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16052 - 14107 - Policy CLT3 - Secondary Education - None

16052 Support

CHAPTER 9 Policy CLT3 - Secondary Education

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: Parking facilities for cars and public transport have in the past been badly thought out. We must ensure better provision in future.

Summary: Parking facilities for cars and public transport have in the past been badly thought out. We must ensure better provision in future.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16124 - 7984 - Policy CLT3 - Secondary Education - i

16124 Object

CHAPTER 9 Policy CLT3 - Secondary Education

Respondent: Hockley Parish Plan Group (Mr T Gleadall) [7984] **Agent:** N/A

Hockley Parish Plan Group
2 Wood End
Hockley
Essex
SS5 4QL
01702 202892

Full Text: HPPG believes that there are not adequate school places with redevelopment of Eldon Way for housing

Summary: HPPG believes that there are not adequate school places with redevelopment of Eldon Way for housing

Change to Plan Eldon Way development was not included in October 2008 version

Appear at exam? No **Soundness Tests** i

Core Strategy Submission Document

S - 16386 - 8267 - Policy CLT3 - Secondary Education - None

16386 Support

CHAPTER 9 Policy CLT3 - Secondary Education

Respondent: Aber Ltd [8267]

Aber Ltd
C/o Agent

Agent: Colliers CRE (Mr S Chapman) [8266]

Colliers CRE
9 Marylebone Lane
London
W1U 1HL
020 7344 6533

Full Text: In order to facilitate the addition residential units proposed for Ashingdon, it is important that King Edmund School can be expanded in order to accommodate the additional children generated by the new housing.

Summary: In order to facilitate the addition residential units proposed for Ashingdon, it is important that King Edmund School can be expanded in order to accommodate the additional children generated by the new housing.

Change to Plan N/A

Appear at exam? No

Soundness Tests N/A

Core Strategy Submission Document

O - 16660 - 8069 - Policy CLT3 - Secondary Education - i, ii, iii

16660 Object

CHAPTER 9 Policy CLT3 - Secondary Education

Respondent: A W Squier LTD and the Croll Group [8069]

A W Squier LTD and the Croll Group
Doggetts
Rochford

SS4 3RN

Agent: Andrew Martin Associates Ltd (Mr R Pomery) [7786]

Andrew Martin Associates Ltd
Croxtan's Mill
Little Waltham
Chelmsford
Essex

CM3 3PJ

01245 361611

Full Text:

Policy CLT3 - Secondary Education

Summary: The Respondent finds the document to be unsound in its present form, however were the amendments set out in these representations to be incorporated then it is considered that the document will be sound. No objection is raised to the principle of extending the size of the King Edmund School grounds, subject to the provision of robust evidence as to the need and scale of the extension.

Full Text: The respondent owns the majority of the available land surrounding the school and is thus in the best position to facilitate the expansion. However, it is not clear how the land will be acquired, or whether it will form part of a much wider, mixed use allocation in the Allocations DPD. The CS refers to the Essex Schools Organisation Plan, which identifies a need to increase secondary school places in line with housing growth. It is accepted that housing growth and school places are inextricably linked and that the King Edmund School is at capacity and will require extension in the future. What is not clear from the evidence base is where the identified need for 3 hectares has come from. Reference is made to the Essex Schools Organisation Plan; however, this document does not look beyond 2013 and does not consider the residential allocations presently proposed in this CS.

The respondent has substantial interests in the land identified in the broad locations set out in H2 and H3. It is considered that the school expansion should be part and parcel of the development that comes through in the Ashingdon allocations. An indicative masterplan is attached to these representations, which illustrates a growth option combining urban extensions with the enhancement of King Edmund School.

Amendment to Policy CLT3:

Reference to the need for 3 hectares should only be included if this area can be properly demonstrated.

Masterplan/Facilities plan Council ref AE22

Summary:

Summary: The Respondent finds the document to be unsound in its present form, however were the amendments set out in these representations to be incorporated then it is considered that the document will be sound. No objection is raised to the principle of extending the size of the King Edmund School grounds, subject to the provision of robust evidence as to the need and scale of the extension.

Masterplan/Facilities plan Council ref AE22

Change to Plan

Amendment to Policy CLT3:

Reference to the need for 3 hectares should only be included if this area can be properly demonstrated.

Appear at exam? Yes

Soundness Tests i, ii, iii

Core Strategy Submission Document

S - 16053 - 14107 - Healthcare - None

16053 Support

CHAPTER 9 Healthcare

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: We support this policy. However, a proper assessment should be carried out by an appropriate professional body (other than PCT) to ensure that ACTUAL needs are met.

Summary: We support this policy. However, a proper assessment should be carried out by an appropriate professional body (other than PCT) to ensure that ACTUAL needs are met.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16125 - 7984 - Healthcare - i

16125 Object

CHAPTER 9 Healthcare

Respondent: Hockley Parish Plan Group (Mr T Gleadall) [7984] **Agent:** N/A

Hockley Parish Plan Group
2 Wood End
Hockley
Essex
SS5 4QL
01702 202892

Full Text: HPPG believes that there are not enough doctors and dentists available if Eldon Way is redeveloped for housing. The patient to doctor and dentist ratios in Hockley are probably the worst in South East Essex

Summary: HPPG believes that there are not enough doctors and dentists available if Eldon Way is redeveloped for housing. The patient to doctor and dentist ratios in Hockley are probably the worst in South East Essex

Change to Plan Eldon Way redevelopment for housing was not included in ctober 2008 version

Appear at exam? No **Soundness Tests** i

Core Strategy Submission Document

S - 16169 - 14107 - Policy CLT4 - Healthcare - None

16169 Support

CHAPTER 9 Policy CLT4 - Healthcare

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: We support this policy. However, a proper assessment should be carried out by an appropriate professional body (other than PCT) to ensure that ACTUAL needs are met.

Summary: We support this policy. However, a proper assessment should be carried out by an appropriate professional body (other than PCT) to ensure that ACTUAL needs are met.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16831 - 10063 - Policy CLT4 - Healthcare - i

16831 Object

CHAPTER 9 Policy CLT4 - Healthcare

Respondent: Sainsbury's Supermarkets Ltd [10063]
Sainsbury's Supermarkets Ltd
Unknown - represented by Indigo Planning

Agent: Indigo Planning (Mr S McGrath) [14267]
Indigo Planning
Swan Court
Worple Road
London
SW19 4JS
020 8606 9400

Full Text: ROCHFORD DISTRICT COUNCIL LOCAL DEVELOPMENT FRAMEWORK: CORE STRATEGY SUBMISSION CONSULTATION DOCUMENT

We write on behalf of our client, Sainsbury's Supermarkets Ltd, in respect of the recently published Rochford Core Strategy Submission consultation document. Sainsbury's does not currently have any stores in Rochford but are interested in pursuing future opportunities to develop their retail offer in the area. As such, they are keen to be involved in the Local Development Framework process.

Our representations to earlier consultation stages of the Core Strategy supported the Council's housing strategy. Whilst we re-iterate this support, we consider that the Core Strategy does not sufficiently provide for future retail requirements across the District to support this housing strategy. The Council should adopt a flexible approach to identifying floorspace capacity, particularly in light of the findings of the Retail Study that Rochford suffers from significant expenditure leakage.

This flexible approach to floorspace capacity would allow for improved competition and an improvement to the quality of goods and services provision in the District. It is important for the Council to acknowledge the important contribution retail development makes in achieving and maintaining vital and viable communities and, thus, the Core Strategy and other Local Development Framework documents should allow for appropriate additions to the retail offer in the District.

In relation to the specific policies of the document, we object to Policy CLT4, and the requirement for new non-residential development of over 1,000 square meters to be accompanied by a Health Impact Assessment. This policy is too restrictive on certain developments, such as retail, which will clearly not have an adverse impact on local health facilities. The Council should be encouraging development in the District and not imposing additional requirements on developer's who are aiming to deliver important local facilities.

Sainsbury's wish to continue to work with the Council to improve Rochford's convenience retail offer and we always welcome the opportunity of meeting with officers to discuss Sainsbury's aspirations in the District.

Summary: In relation to the specific policies of the document, we object to Policy CLT4, and the requirement for new non-residential development of over 1,000 square meters to be accompanied by a Health Impact Assessment. This policy is too restrictive on certain developments, such as retail, which will clearly not have an adverse impact on local health facilities. The Council should be encouraging development in the District and not imposing additional requirements on developer's who are aiming to deliver important local facilities.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 15774 - 10779 - Policy CLT5 - Open Space - i, iii

15774 Object

CHAPTER 9 Policy CLT5 - Open Space

Respondent: Sport England (East Region) (Mr Roy Warren)
[10779]
Sport England (East Region)
Crescent House
19 The Crescent
Bedford
MK40 2QP
UK
0207 273 1831

Agent: N/A

Full Text: Not sound because no up-to-date evidence base on open space needs - does not meet justified or accoring with national policy criteria for following reasons:
- evidence base does not include an audit/assessment of open space, sport and recreation needs as required by PPG17 (paragrapsh 1-5)
- existing playing pitch assessment (2002) is out-of-date and would not be able to fully consider existing/future outdoor sports needs
- without needs assessment to support this policy it will be difficult to strategically plan for new open space in the core strategy, justifying protection of existing open or require new development to make provision

Summary: Not sound because no up-to-date evidence base on open space needs - does not meet justified or accoring with national policy criteria for following reasons:
- evidence base does not include an audit/assessment of open space, sport and recreation needs as required by PPG17 (paragrapsh 1-5)
- existing playing pitch assessment (2002) is out-of-date and would not be able to fully consider existing/future outdoor sports needs
- without needs assessment to support this policy it will be difficult to strategically plan for new open space in the core strategy, justifying protection of existing open or require new development to make provision

Change to Plan An assessment of open space, sport and recreation needs should be undertaken which accords with guidance in PPG17 in order to ensure this policy is underpinned by a robust evidence base in order to justify its requirements. Further advice can be provided upon request.

Appear at exam? No **Soundness Tests** i, iii

Core Strategy Submission Document

O - 15776 - 10779 - Policy CLT5 - Open Space - ii, iii

15776 Object

CHAPTER 9 Policy CLT5 - Open Space

Respondent: Sport England (East Region) (Mr Roy Warren) **Agent:** N/A
[10779]

Sport England (East Region)
Crescent House
19 The Crescent
Bedford
MK40 2QP
UK
0207 273 1831

Full Text: Would not be sound in terms of meeting the effective and national policy accordance criteria for following reasons:
- no criteria for assessing proposals affecting open space as certain types of development on open space may be acceptable e.g. ancillary facilities, sports facilities - PPG17 paragraphs 10-18 provide guidance but this is not reflected in policy
- ambiguous as the word 'usually' open to misinterpretation - criteria should be used to set out exceptions where open space will not be protected and no guidance for assessing proposals for new open space as reference only made to open space being promoted

Summary: Would not be sound in terms of meeting the effective and national policy accordance criteria for following reasons:
- no criteria for assessing proposals affecting open space as certain types of development on open space may be acceptable e.g. ancillary facilities, sports facilities - PPG17 paragraphs 10-18 provide guidance but this is not reflected in policy
- ambiguous as the word 'usually' open to misinterpretation - criteria should be used to set out exceptions where open space will not be protected and no guidance for assessing proposals for new open space as reference only made to open space being promoted

Change to Plan Policy or supporting text to provide criteria for assessing proposals for new open space or for proposals affecting open space using PPG17 guidance in order to ensure effectiveness when used for development control and to ensure consistency with government policy.

Appear at exam? No **Soundness Tests** ii, iii

Core Strategy Submission Document

S - 15992 - 13441 - Policy CLT5 - Open Space - None

15992 Support

CHAPTER 9 Policy CLT5 - Open Space

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: It is unclear whether public conveniences and public art should be provided in the same place

Summary: It is unclear whether public conveniences and public art should be provided in the same place

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16095 - 7336 - Policy CLT5 - Open Space - i

16095 Object

CHAPTER 9 Policy CLT5 - Open Space

Respondent: Rayleigh Town Council (Mrs K Cumberland) [7336] **Agent:** N/A

Rayleigh Town Council
The Pavilion
King George V Playing Field
Bull Lane
Rayleigh
Essex
SS6 8JD

01268 741880

Full Text: Policy CLT5 The second paragraph needs to be more specific and robust in particular forming a barrier between any possible new development and the A1245 road preventing any further westward sprawl and coalescence of Rayleigh and Rawreth. (see (4) above)

Summary: Policy CLT5 The second paragraph needs to be more specific and robust in particular forming a barrier between any possible new development and the A1245 road preventing any further westward sprawl and coalescence of Rayleigh and Rawreth. (see (4) above)

Change to Plan see above comments

Appear at exam? No **Soundness Tests** i

Core Strategy Submission Document

S - 16181 - 5322 - Policy CLT5 - Open Space - None

16181 Support

CHAPTER 9 Policy CLT5 - Open Space

Respondent: Pond Chase Nurseries Ltd [5322]

Pond Chase Nurseries Ltd
Folly Lane
Hockley
Essex
SS5 4SR

Agent: Boyer Planning Ltd (Mr R Ricks) [8313]

Boyer Planning Ltd
49 North Hill
Colchester
Essex
CO1 1PY
01206 769018

Full Text: We support this policy for provision of public open space and to safeguard existing open spaces.

The development proposals for Pond Chase Nursery site will provide new areas of public open space and also areas where nature conservation will have a priority and public access would be limited.

With regard to the built up nature of the urban areas, the retention of existing areas of open space remains of significant importance for existing and future residents. Residential development should not only ensure that it does not remove existing open spaces, but makes provision compatible with the scale of development proposed.

Summary: We support this policy for provision of public open space and to safeguard existing open spaces.

The development proposals for Pond Chase Nursery site will provide new areas of public open space and also areas where nature conservation will have a priority and public access would be limited.

With regard to the built up nature of the urban areas, the retention of existing areas of open space remains of significant importance for existing and future residents. Residential development should not only ensure that it does not remove existing open spaces, but makes provision compatible with the scale of development proposed.

Change to Plan N/A

Appear at exam? Not Specified

Soundness Tests N/A

Core Strategy Submission Document

S - 16235 - 8650 - Policy CLT5 - Open Space - None

16235 Support

CHAPTER 9 Policy CLT5 - Open Space

Respondent: Countryside Properties (Southern) Ltd (Mr Steve Price) [8650] **Agent:** N/A

Countryside Properties (Southern) Ltd
Countryside House
The Drive
Brentwood
Essex
CM13 3AT
01277260000

Full Text: Whilst we do not object to the requirement of public open space on land to the west of Rayleigh, it must be made clear that the level of provision we make, or extent of financial contribution towards its provision and maintenance, be reasonably related to the impact of the development of the land. Circular 5/05 and the emerging/published DCLG guidance on the use of CIL, makes it clear that new developments/contributions from new development can not be used to resolve existing deficiencies (only, proportionally, those deficiencies made worse by new development).

The policy should state that the extent of public open space to the west of Rayleigh should be determined via a master plan or development brief for the site.

Summary: Whilst we do not object to the requirement of public open space on land to the west of Rayleigh, it must be made clear that the level of provision we make, or extent of financial contribution towards its provision and maintenance, be reasonably related to the impact of the development of the land

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16886 - 8329 - Policy CLT5 - Open Space - None

16886 Support

CHAPTER 9 Policy CLT5 - Open Space

Respondent: Swan Hill Homes Limited [8329]

Swan Hill Homes Limited
C/O Agent
Mr P Kneen
Charles Planning

Agent: Charles Planning Associates Ltd (Mr P Kneen) [5040]

Charles Planning Associates Ltd
1644-1645 Parkway
Solent Business Park
Whiteley
Fareham
Hampshire
PO15 7AH
01489 580853

Full Text:

1.0 Instruction and Introduction

1.1 Charles Planning Associates Limited (Chartered Town Planners) is Instructed by Swan Hill Homes Limited (Swan Hill) to prepare and submit representations on their behalf in respect of the Rochford District Local Development Framework: Core Strategy Submission (September 2009) Development Plan Document.

1.2 The comments refer to the relevant sections and policy designations in the Submission document, as appropriate.

1.3 The comments set out in this submission are intended to assist the District Council in taking forward its Local Development Framework. It is our intention to continue to be involved in the LDF preparation process and we look forward to the opportunity to comment further at the Examination to the Core Strategy.

1.4 If you have any queries regarding the content of this submission then please do not hesitate to contact:

Peter Kneen BSc (Hons) MSc MRTPI
Planner

2.0 Housing:

Policy H1 - The Efficient Use of Land for Housing

2.1 Swan Hill recognises the importance of seeking to concentrate new developments mainly in the existing urban areas, on previously developed land where possible, particularly in view of the Government seeking to ensure 60% of all such new developments are on previously development land (PDL).

2.2 However, given the character of the District, and the strategic housing requirement of the East of England Plan, Swan Hill supports the approach that the Council must also make provision for additional development on the edge of existing settlements on greenfield sites, particularly in the most sustainable locations. As such, Swan Hill supports that where feasible, the redevelopment of existing employment sites for residential/employment purposes can make a contribution towards the strategic housing requirement, provided that sufficient additional employment land is brought forward to ensure the stability of employment levels in the District, and to ensure employment growth meets the East of England Plan requirements.

2.3 Swan Hill considers that Policy H1 should include consideration that new extensions to existing settlements have regard to their potential impact on the wider characteristics and openness objectives of the Green Belt.

Policy H2 - Extensions to Residential Envelopes and Phasing

2.4 Swan Hill generally supports the approach taken by the Council in this policy. As set out above, Swan Hill consider the Council's acknowledgment that housing requirements should be met through the allocation of land on the edge of the existing settlements is the most suitable way forward to meeting the Council's strategic housing requirement and complies with the advice in PPS3.

2.5 The need for suitable greenfield urban extensions represents the best way forward for the Council to meet its strategic housing requirement, as set out in the East of England Plan. Swan Hill supports the recognition that the potential supply of alternative previously developed sites is limited, without detrimentally affecting the character of the District, and therefore the best way forward is the use of sustainable greenfield urban extensions to the existing settlements of the District.

2.6 However, Swan Hill consider that a fundamental consideration that the District Council should consider relates to the potential impact of the urban extensions on the Green Belt policy has been somewhat overlooked. The wider sustainability credentials of the settlements of the District should only be one of many key considerations for determining the level of expansion. In view of the proximity of Southend-on-Sea to all the main settlements of the District, and the influence this has on the likely location many people would travel for employment and leisure, sustainability of many of the settlements is not a key overarching factor, and greater weight should be placed on the potential impact on the openness of the Green Belt, as this cannot be remedied if development occurs in the wrong location.

2.7 As such, Swan Hill considers that determining the location of growth for the main settlements should be to identify

16886 Support

CHAPTER 9 Policy CLT5 - Open Space

those locations where the impact on the wider setting of the Green Belt can be minimised. Further justification for those general locations chosen should be identified in Policy H2. In this regard, Swan Hill has serious concerns regarding the removal of Land South West of Great Wakering as a viable option for the growth of the settlement. The development of this area of Great Wakering, in addition to the potential redevelopment of the Star Lane Industrial Estate could provide a more comprehensive development, whilst ensuring that the wider openness of the Green Belt is maintained. Land South West of Great Wakering is significantly better placed to limit the impact on the wider Green Belt than Land West of Great Wakering, and could contribute to the provision of an important amenity and wildlife site for the local community.

2.8 In addition, Swan Hill consider that the Council now has no reserve provision in the event that any of the existing employment sites set out in Policy H1 fail to come forward for development within the envisaged timescale. Further, Land West of Great Wakering has not been identified in the SHLAA as a deliverable site to help meet the strategic housing requirement, contrary to the requirement set out in PPS3.

2.9 As such, Swan Hill would support the provision of suitable sites which could be safeguarded for future development in the likelihood of a shortfall in supply.

Policy H3 - Extensions to Residential Envelopes Post 2021

2.10 As set out above, Swan Hill supports the overall approach the Council has taken towards the provision of sustainable urban extensions as a suitable means of meeting their strategic housing requirement. However, as set out for Policy H2 above, Swan Hill has serious concerns regarding the removal of several proposed sites set out in the October 2008 Preferred Options Core Strategy, without any guarantee of the ability to deliver those sites set out in Policy H1.

2.11 As also considered above, the inclusion of West of Great Wakering for 250 dwellings should not be included ahead of South West of Great Wakering, in view of the fact that the site is not identified in the SHLAA as available, suitable and achievable as required by PPS3, and thus is not supported by a robust and creditable evidence base for its inclusion as a strategic site for development.

2.12 Whilst Swan Hill acknowledge that alterations to Policy H1 has resulted in the removal of some locations for growth in Policy H3 (as set out in the Sustainability Appraisal), Swan Hill does not consider that the most appropriate locations have been chosen.

2.13 In addition to the matters raised above, the use of West of Great Wakering would also result in the loss of valuable agricultural land, which clearly in a Green Belt location, should be less suitable for development than other sites, such as South West of Great Wakering, which would have limited impact on the wider Green Belt policy, and not result in the loss of valuable agricultural land.

2.14 Finally, in respect of Policies H1, H2 and H3, all of the above comments are based on our interpretation of the Submission Version Core Strategy when compared to the October 2008 Version of the Core Strategy. Without the ability to undertake a detailed assessment of the Council's SHLAA, it is not possible to clarify the proposed Core Strategy position regarding the proposed direction of growth proposed for the settlements in the District. As such, Swan Hill reserves the right to make additional representations regarding the proposed Policies H1, H2 and H3 following the publication of the SHLAA in due course.

Policy H4 - Affordable Housing

2.15 In general terms, Swan Hill supports the approach taken by the Council towards the provision of affordable housing for new residential developments. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H5 - Dwelling Types

2.16 Swan Hill supports the policy provision of H5, and considers that the approach taken by the Council for this policy represents a suitably flexible alternative to stipulating percentages of dwelling mix, sought by some local authorities. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H6 - Lifetime Homes

2.17 In regard to this policy, Swan Hill objects to the Council's policy where all new dwellings should be provided to the Lifetime Homes Standard. Whilst it is acknowledged that the UK has an aging population, Swan Hill considers that seeking to provide Lifetime Homes on all sites is considered to be overly onerous for proposed developers, particularly when considering the requirement for all car parking spaces to be suitable for disabled users, which could result in more schemes becoming unviable. Therefore, the provision of a percentage of Lifetime Homes should be considered through negotiations with the Council at the planning application stage, and should be determined on a case-by-case basis.

3.0 Character of Place: Policy CP1 - Design

16886 Support

CHAPTER 9 Policy CLT5 - Open Space

3.1 The Town and Country Planning (General Development Procedure) Order 1995 (As Amended) makes the submission of a Design and Access Statement for most types of planning applications a Statutory requirement, and as such, the provision of a Design Brief represents a pre-requisite of all major planning applications.

3.2 Policy CP1 seeks to ensure the provision of good, high quality developments that reflect local characteristics and distinctiveness, this ideology is supported by Swan Hill.

4.0 The Green Belt:
Policy GB1 - Green Belt Protection

4.1 Following the amendments to the wording of the Policy since the October 2008 Preferred Options Core Strategy, Swan Hill is now generally supportive of Policy GB1 and its supporting text. However, as expressed above, it is important that where alterations to the Green Belt boundary occur as a result of the extension of the settlements to meet the strategic housing requirement, both the minimal amount of land is taken and where that land is taken for development, it represents the best available land which has a minimal impact of the wider openness characteristic of the Green Belt.

5.0 Environmental Issues:
Policy ENV3 - Flood Risk

5.1 Swan Hill generally supports the approach set out in Policy ENV3 regarding ensuring development accords with the sequential test of PPS25. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV4 - Sustainable Drainage Systems (SUDS)

5.2 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV4. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV8 - On-site Renewable and Low Carbon Energy Generation

5.3 Whilst Swan Hill recognises the importance of reducing carbon emissions, particularly in new housing developments, and the role this can play in reducing the nations overall Greenhouse emissions. As such Swan Hill is generally supportive of Policy ENV8. It is noted that Policy ENG1 of the East of England Plan sets out a threshold of developments comprising 10 or more dwellings. Swan Hill consider it important for the District Council to justify the reduction in the threshold level.

5.4 Further, no assessment of Policy ENV8 has been set out in the Sustainability Appraisal which justifies the change in threshold from that of Policy ENG1 of the RSS.

Policy ENV9 - Code for Sustainable Homes

5.5 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV9. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

6.0 Community Infrastructure, Leisure and Tourism:
Policy CLT1 - Planning Obligations and Standard Charges

6.1 Swan Hill generally supports the overall approach the Council has taken in Policy CLT1. It is considered Policy CLT1 sets out a degree of flexibility to ensure that all sites are considered on a site-by-site basis, assessing the individual merits of each planning application, in order to ensure the levels of contributions applicable meet the five tests of Circular 05/05. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policies CLT5 - Open Space;
CLT7 - Play Space;
CLT8 - Youth Facilities; and,
CLT10 - Playing Pitches

6.2 Swan Hill supports the need for new residential developments to incorporate a degree of new publicly accessible open space, children's play space, youth facilities and playing pitches, and as such, generally supports the policy approaches taken by the Council.

6.3 However, it is important that whilst the Council may seek to undertake an assessment of providing standard charges for new development, which, as set out in Policy CLT1, this should be based on thorough public consultation and consideration and sound justification. Swan Hill consider that within the provision of a standard charge, it is important that such provision allows for a degree of flexibility to ensure that each site is assessed individually and on its own merits. This is particularly important for those sites close to existing open spaces and facilities. As such, the levels of

16886 Support

CHAPTER 9 Policy CLT5 - Open Space

open space and recreation facilities required in the 'standard charge' should be based on an up-to-date PPG17 Open Space assessment, which should be used to form a key consideration in the levels of provision likely to be required in the standard charge system proposed.

7.0 Transport: Policy T1 - Highways

7.1 Swan Hill supports the overall objectives set out in Policy T1 requiring developments to be located and designed to reduce the reliance on the private car and to meet the infrastructure needs generated by development or seek to help achieve these needs is acceptable in principle.

7.2 Swan Hill recognises the importance of providing sufficient infrastructure provision to meet the requirements of development, and that where developments have insufficient consideration of impact on existing infrastructure, they should be considered unacceptable and contrary to National policy guidance. However, Swan Hill considers it important to emphasise that the developer's role should not be seen as a means to meet existing shortfalls in provision.

Policy T3 - Public Transport

7.3 Swan Hill is generally supportive of the policy approach set out in T3, however, as set out in paragraph 7.2 above, it is important that the District Council do not consider that it is the developer's responsibility to resolve existing shortfalls in provision of public transport, and any contribution towards additional public transportation provision should only be to mitigate against the additional level of demand likely from the development proposed.

Policy T5 - Cycling and Walking

7.4 Swan Hill supports the general approach to this policy, as Swan Hill recognises the importance of promoting the use of alternatives to the private car. The policy provision acknowledges the need to ensure relevant contributions in the event of additional travel demands generated by individual developments, whilst also setting out additional aspirations for the cycle network in the District.

7.5 As such, Swan Hill considers this policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy T8 - Parking Standards

7.6 The Council has recently (January 2007) adopted SPD on the requirements for parking standards, and as such, Swan Hill generally supports the policy approach chosen by the Council. As set out in the SPD, whilst Swan Hill generally supports the approach taken by the District Council towards setting residential parking standards, in that the Council has recognised that in the suburban areas, even with some access to public transport, the majority of residents will rely on the use of private cars. However, Swan Hill has concerns over the failure of the District Council to comply with the provisions of PPG13: Transport (2001) which sets out that Local Planning Authorities should not set minimum standards for car parking. Whilst it is acknowledged that PPS3 sets out provision for the consideration of local circumstances, it is considered that the Council has not justified this deviation from PPG13's maximum standard.

7.7 Whilst it is acknowledged that such justification may become apparent through the work currently being undertaken by Essex County Council, until such time, the District Council should only seek to apply the maximum standards indicated in PPG13. However, Swan Hill recommends that the District Council make provisions in the wording of the Policy to allow for changes in the event that future policy on car parking standards need to reflect the County standard, following the completion of the County Council review.

8.0 Economic Development: Policies ED3 - Existing Employment Land ED4 - Future Employment Allocations

8.1 In respect of Policies ED3 and ED4, Swan Hill notes that they have changed considerably since the October 2008 Preferred Options document, in that they are site specific regarding the location of the proposed redevelopment of existing employment sites. These four sites are also identified in Policy H1 - Efficient Use of Land, and in general, Swan Hill supports the approach to the redevelopment of these sites (where feasible) based on the assessments of the sites set out in this version of the Core Strategy.

8.2 However, Swan Hill has concerns that these policies might not be considered suitably sound given that insufficient opportunity has been allocated for consultation on their redevelopment. Without the SHLAA being publically available prior to the consultation on this Core Strategy, an insufficient evidence base has been provided to corroborate that these sites are neither suitable or deliverable to meet the test of soundness requirements.

Summary:

Policies CLT5 - Open Space;
CLT7 - Play Space;
CLT8 - Youth Facilities; and,
CLT10 - Playing Pitches

Core Strategy Submission Document

S - 16886 - 8329 - Policy CLT5 - Open Space - None

16886 Support

CHAPTER 9 Policy CLT5 - Open Space

6.2 Swan Hill supports the need for new residential developments to incorporate a degree of new publicly accessible open space, children's play space, youth facilities and playing pitches, and as such, generally supports the policy approaches taken by the Council.

6.3 However, it is important that whilst the Council may seek to undertake an assessment of providing standard charges for new development, which, as set out in Policy CLT1, this should be based on thorough public consultation and consideration and sound justification. Swan Hill consider that within the provision of a standard charge, it is important that such provision allows for a degree of flexibility to ensure that each site is assessed individually and on its own merits. This is particularly important for those sites close to existing open spaces and facilities. As such, the levels of open space and recreation facilities required in the 'standard charge' should be based on an up-to-date PPG17 Open Space assessment, which should be used to form a key consideration in the levels of provision likely to be required in the standard charge system proposed.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16105 - 7336 - Policy CLT6 - Community Facilities - None

16105 Support

CHAPTER 9 Policy CLT6 - Community Facilities

Respondent: Rayleigh Town Council (Mrs K Cumberland) [7336] **Agent:** N/A

Rayleigh Town Council
The Pavilion
King George V Playing Field
Bull Lane
Rayleigh
Essex
SS6 8JD

01268 741880

Full Text: Strongly support this

Summary: Strongly support this

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16236 - 8650 - Policy CLT6 - Community Facilities - None

16236 Support

CHAPTER 9 Policy CLT6 - Community Facilities

Respondent: Countryside Properties (Southern) Ltd (Mr Steve Price) [8650] **Agent:** N/A

Countryside Properties (Southern) Ltd
Countryside House
The Drive
Brentwood
Essex
CM13 3AT
01277260000

Full Text: If a need for community facilities is identified for the land we promote, it must be made clear that the scale and nature of the facility or level of contribution we make towards such a facility should be reasonably related to the impact of any development of the land. Circular 5/05 and the emerging/published DCLG guidance on the use of CIL, makes it clear that new developments/contributions from new development can not be used to resolve existing deficiencies (only, proportionally, those deficiencies made worse by new development).

Summary: If a need for community facilities is identified for the land we promote, it must be made clear that the scale and nature of the facility or level of contribution we make towards such a facility should be reasonably related to the impact of any development of the land. Circular 5/05 and the emerging/published DCLG guidance on the use of CIL, makes it clear that new developments/contributions from new development can not be used to resolve existing deficiencies (only, proportionally, those deficiencies made worse by new development).

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16564 - 7428 - Policy CLT6 - Community Facilities - i, ii

16564 Object

CHAPTER 9 Policy CLT6 - Community Facilities

Respondent: The Theatres Trust (Ms R Freeman) [7428]

The Theatres Trust
22 Charing Cross Road
London
WC2H 0QL
020 7836 8591

Agent: N/A

Full Text: Core Strategy Submission

Thank you for your email of 21 September consulting The Theatres Trust on the Core Strategy Submission.

The Theatres Trust is the national advisory public body for theatres and a statutory consultee on planning applications affecting land on which there is a theatre. This applies to all theatre buildings, old and new, in current use, in other uses, or disused. Established by The Theatres Trust Act 1976 'to promote the better protection of theatres', our main objective is to safeguard theatre use, or the potential for such use but we also provide expert advice on design, conservation, property and planning matters to theatre operators, local authorities and official bodies.

Due to the specific nature of the Trust's remit we are concerned with the protection and promotion of theatres and therefore anticipate policies relating to cultural facilities.

Tests of Soundness

We do not find this document to be sound as it does not reflect your Cultural Strategy which is listed as a District Strategy on page 23, nor do we believe it will be effective.

Reasons

The Core Strategy does not address the issues raised in the Cultural Strategy:

Cultural Strategy page 5 - We have already mentioned that culture affects us all on a daily basis, so it is essential that we do not leave future developments to chance. By creating this strategy and continuing the evaluation and development of the action plans, we can ensure that all gaps in provision, opportunities, demands and aspirations, priorities and partners, are identified and acted upon.

Cultural Strategy page 12 - Lack of cultural facilities in the district was also highlighted, including no specific museum or live music and performance focused space, as well as a frustration regarding the lack of cohesive communication about all opportunities in the district.

Policy CLT9 Leisure Facilities only deals with sport and recreation, according to the accompanying text. Policy CLT6 Community Facilities does not include a description of what facilities are included in the policy and there is no Glossary for the document. It is therefore unclear where the issue of the lack of cultural facilities is attended to in the document. The most likely location for cultural facilities would be Rayleigh Town Centre but its Policy RTC4 only states that an Area Action Plan will provide a range of evening uses. The deferring of development implementations to subsequent planning documents places the reliance on these other documents to make the important decisions. The Core Strategy will set the scene for more detailed guidance but should be able to stand on its own.

The document lacks a clear spatial focus and there are few specifics as to the scale of development, the range and mix of uses, how they relate to each other and the infrastructure necessary to achieve this.

Core Strategy Submission Document

16564 Object

CHAPTER 9 Policy CLT6 - Community Facilities

The policies seem to be a set of generalities lacking any real analysis of the area and the key challenges facing the District. The wording of policies needs to be robust and clear because of the way they determine whether or not, and how development can take place.

Summary: The Core Strategy does not address the issues raised in the Cultural Strategy:

Cultural Strategy page 5 - We have already mentioned that culture effects us all on a daily basis, so it is essential that we do not leave future developments to chance. By creating this strategy and continuing the evaluation and development of the action plans, we can ensure that all gaps in provision, opportunities, demands and aspirations, priorities and partners, are identified and acted upon.

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The policies seem to be a set of generalities lacking any real analysis of the area and the key challenges facing the District. The wording of policies needs to be robust and clear because of the way they determine whether or not, and how development can take place.

Change to Plan

Appear at exam?	Not Specified	Soundness Tests	i, ii
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Core Strategy Submission Document

S - 16887 - 8329 - Policy CLT7 - Play Space - None

16887 Support

CHAPTER 9 Policy CLT7 - Play Space

Respondent: Swan Hill Homes Limited [8329]

Swan Hill Homes Limited
C/O Agent
Mr P Kneen
Charles Planning

Agent: Charles Planning Associates Ltd (Mr P Kneen) [5040]

Charles Planning Associates Ltd
1644-1645 Parkway
Solent Business Park
Whiteley
Fareham
Hampshire
PO15 7AH
01489 580853

Full Text:

1.0 Instruction and Introduction

1.1 Charles Planning Associates Limited (Chartered Town Planners) is Instructed by Swan Hill Homes Limited (Swan Hill) to prepare and submit representations on their behalf in respect of the Rochford District Local Development Framework: Core Strategy Submission (September 2009) Development Plan Document.

1.2 The comments refer to the relevant sections and policy designations in the Submission document, as appropriate.

1.3 The comments set out in this submission are intended to assist the District Council in taking forward its Local Development Framework. It is our intention to continue to be involved in the LDF preparation process and we look forward to the opportunity to comment further at the Examination to the Core Strategy.

1.4 If you have any queries regarding the content of this submission then please do not hesitate to contact:

Peter Kneen BSc (Hons) MSc MRTPI
Planner

2.0 Housing:
Policy H1 - The Efficient Use of Land for Housing

2.1 Swan Hill recognises the importance of seeking to concentrate new developments mainly in the existing urban areas, on previously developed land where possible, particularly in view of the Government seeking to ensure 60% of all such new developments are on previously development land (PDL).

2.2 However, given the character of the District, and the strategic housing requirement of the East of England Plan, Swan Hill supports the approach that the Council must also make provision for additional development on the edge of existing settlements on greenfield sites, particularly in the most sustainable locations. As such, Swan Hill supports that where feasible, the redevelopment of existing employment sites for residential/employment purposes can make a contribution towards the strategic housing requirement, provided that sufficient additional employment land is brought forward to ensure the stability of employment levels in the District, and to ensure employment growth meets the East of England Plan requirements.

2.3 Swan Hill considers that Policy H1 should include consideration that new extensions to existing settlements have regard to their potential impact on the wider characteristics and openness objectives of the Green Belt.

Policy H2 - Extensions to Residential Envelopes and Phasing

2.4 Swan Hill generally supports the approach taken by the Council in this policy. As set out above, Swan Hill consider the Council's acknowledgment that housing requirements should be met through the allocation of land on the edge of the existing settlements is the most suitable way forward to meeting the Council's strategic housing requirement and complies with the advice in PPS3.

2.5 The need for suitable greenfield urban extensions represents the best way forward for the Council to meet its strategic housing requirement, as set out in the East of England Plan. Swan Hill supports the recognition that the potential supply of alternative previously developed sites is limited, without detrimentally affecting the character of the District, and therefore the best way forward is the use of sustainable greenfield urban extensions to the existing settlements of the District.

2.6 However, Swan Hill consider that a fundamental consideration that the District Council should consider relates to the potential impact of the urban extensions on the Green Belt policy has been somewhat overlooked. The wider sustainability credentials of the settlements of the District should only be one of many key considerations for determining the level of expansion. In view of the proximity of Southend-on-Sea to all the main settlements of the District, and the influence this has on the likely location many people would travel for employment and leisure, sustainability of many of the settlements is not a key overarching factor, and greater weight should be placed on the potential impact on the openness of the Green Belt, as this cannot be remedied if development occurs in the wrong location.

2.7 As such, Swan Hill considers that determining the location of growth for the main settlements should be to identify

16887 Support

CHAPTER 9 Policy CLT7 - Play Space

those locations where the impact on the wider setting of the Green Belt can be minimised. Further justification for those general locations chosen should be identified in Policy H2. In this regard, Swan Hill has serious concerns regarding the removal of Land South West of Great Wakering as a viable option for the growth of the settlement. The development of this area of Great Wakering, in addition to the potential redevelopment of the Star Lane Industrial Estate could provide a more comprehensive development, whilst ensuring that the wider openness of the Green Belt is maintained. Land South West of Great Wakering is significantly better placed to limit the impact on the wider Green Belt than Land West of Great Wakering, and could contribute to the provision of an important amenity and wildlife site for the local community.

2.8 In addition, Swan Hill consider that the Council now has no reserve provision in the event that any of the existing employment sites set out in Policy H1 fail to come forward for development within the envisaged timescale. Further, Land West of Great Wakering has not been identified in the SHLAA as a deliverable site to help meet the strategic housing requirement, contrary to the requirement set out in PPS3.

2.9 As such, Swan Hill would support the provision of suitable sites which could be safeguarded for future development in the likelihood of a shortfall in supply.

Policy H3 - Extensions to Residential Envelopes Post 2021

2.10 As set out above, Swan Hill supports the overall approach the Council has taken towards the provision of sustainable urban extensions as a suitable means of meeting their strategic housing requirement. However, as set out for Policy H2 above, Swan Hill has serious concerns regarding the removal of several proposed sites set out in the October 2008 Preferred Options Core Strategy, without any guarantee of the ability to deliver those sites set out in Policy H1.

2.11 As also considered above, the inclusion of West of Great Wakering for 250 dwellings should not be included ahead of South West of Great Wakering, in view of the fact that the site is not identified in the SHLAA as available, suitable and achievable as required by PPS3, and thus is not supported by a robust and creditable evidence base for its inclusion as a strategic site for development.

2.12 Whilst Swan Hill acknowledge that alterations to Policy H1 has resulted in the removal of some locations for growth in Policy H3 (as set out in the Sustainability Appraisal), Swan Hill does not consider that the most appropriate locations have been chosen.

2.13 In addition to the matters raised above, the use of West of Great Wakering would also result in the loss of valuable agricultural land, which clearly in a Green Belt location, should be less suitable for development than other sites, such as South West of Great Wakering, which would have limited impact on the wider Green Belt policy, and not result in the loss of valuable agricultural land.

2.14 Finally, in respect of Policies H1, H2 and H3, all of the above comments are based on our interpretation of the Submission Version Core Strategy when compared to the October 2008 Version of the Core Strategy. Without the ability to undertake a detailed assessment of the Council's SHLAA, it is not possible to clarify the proposed Core Strategy position regarding the proposed direction of growth proposed for the settlements in the District. As such, Swan Hill reserves the right to make additional representations regarding the proposed Policies H1, H2 and H3 following the publication of the SHLAA in due course.

Policy H4 - Affordable Housing

2.15 In general terms, Swan Hill supports the approach taken by the Council towards the provision of affordable housing for new residential developments. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H5 - Dwelling Types

2.16 Swan Hill supports the policy provision of H5, and considers that the approach taken by the Council for this policy represents a suitably flexible alternative to stipulating percentages of dwelling mix, sought by some local authorities. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H6 - Lifetime Homes

2.17 In regard to this policy, Swan Hill objects to the Council's policy where all new dwellings should be provided to the Lifetime Homes Standard. Whilst it is acknowledged that the UK has an aging population, Swan Hill considers that seeking to provide Lifetime Homes on all sites is considered to be overly onerous for proposed developers, particularly when considering the requirement for all car parking spaces to be suitable for disabled users, which could result in more schemes becoming unviable. Therefore, the provision of a percentage of Lifetime Homes should be considered through negotiations with the Council at the planning application stage, and should be determined on a case-by-case basis.

3.0 Character of Place: Policy CP1 - Design

16887 Support

CHAPTER 9 Policy CLT7 - Play Space

3.1 The Town and Country Planning (General Development Procedure) Order 1995 (As Amended) makes the submission of a Design and Access Statement for most types of planning applications a Statutory requirement, and as such, the provision of a Design Brief represents a pre-requisite of all major planning applications.

3.2 Policy CP1 seeks to ensure the provision of good, high quality developments that reflect local characteristics and distinctiveness, this ideology is supported by Swan Hill.

4.0 The Green Belt:
Policy GB1 - Green Belt Protection

4.1 Following the amendments to the wording of the Policy since the October 2008 Preferred Options Core Strategy, Swan Hill is now generally supportive of Policy GB1 and its supporting text. However, as expressed above, it is important that where alterations to the Green Belt boundary occur as a result of the extension of the settlements to meet the strategic housing requirement, both the minimal amount of land is taken and where that land is taken for development, it represents the best available land which has a minimal impact of the wider openness characteristic of the Green Belt.

5.0 Environmental Issues:
Policy ENV3 - Flood Risk

5.1 Swan Hill generally supports the approach set out in Policy ENV3 regarding ensuring development accords with the sequential test of PPS25. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV4 - Sustainable Drainage Systems (SUDS)

5.2 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV4. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV8 - On-site Renewable and Low Carbon Energy Generation

5.3 Whilst Swan Hill recognises the importance of reducing carbon emissions, particularly in new housing developments, and the role this can play in reducing the nations overall Greenhouse emissions. As such Swan Hill is generally supportive of Policy ENV8. It is noted that Policy ENG1 of the East of England Plan sets out a threshold of developments comprising 10 or more dwellings. Swan Hill consider it important for the District Council to justify the reduction in the threshold level.

5.4 Further, no assessment of Policy ENV8 has been set out in the Sustainability Appraisal which justifies the change in threshold from that of Policy ENG1 of the RSS.

Policy ENV9 - Code for Sustainable Homes

5.5 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV9. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

6.0 Community Infrastructure, Leisure and Tourism:
Policy CLT1 - Planning Obligations and Standard Charges

6.1 Swan Hill generally supports the overall approach the Council has taken in Policy CLT1. It is considered Policy CLT1 sets out a degree of flexibility to ensure that all sites are considered on a site-by-site basis, assessing the individual merits of each planning application, in order to ensure the levels of contributions applicable meet the five tests of Circular 05/05. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policies CLT5 - Open Space;
CLT7 - Play Space;
CLT8 - Youth Facilities; and,
CLT10 - Playing Pitches

6.2 Swan Hill supports the need for new residential developments to incorporate a degree of new publicly accessible open space, children's play space, youth facilities and playing pitches, and as such, generally supports the policy approaches taken by the Council.

6.3 However, it is important that whilst the Council may seek to undertake an assessment of providing standard charges for new development, which, as set out in Policy CLT1, this should be based on thorough public consultation and consideration and sound justification. Swan Hill consider that within the provision of a standard charge, it is important that such provision allows for a degree of flexibility to ensure that each site is assessed individually and on its own merits. This is particularly important for those sites close to existing open spaces and facilities. As such, the levels of

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CHAPTER 9 Policy CLT7 - Play Space

open space and recreation facilities required in the 'standard charge' should be based on an up-to-date PPG17 Open Space assessment, which should be used to form a key consideration in the levels of provision likely to be required in the standard charge system proposed.

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7.1 Swan Hill supports the overall objectives set out in Policy T1 requiring developments to be located and designed to reduce the reliance on the private car and to meet the infrastructure needs generated by development or seek to help achieve these needs is acceptable in principle.

7.2 Swan Hill recognises the importance of providing sufficient infrastructure provision to meet the requirements of development, and that where developments have insufficient consideration of impact on existing infrastructure, they should be considered unacceptable and contrary to National policy guidance. However, Swan Hill considers it important to emphasise that the developer's role should not be seen as a means to meet existing shortfalls in provision.

Policy T3 - Public Transport

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7.5 As such, Swan Hill considers this policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

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7.7 Whilst it is acknowledged that such justification may become apparent through the work currently being undertaken by Essex County Council, until such time, the District Council should only seek to apply the maximum standards indicated in PPG13. However, Swan Hill recommends that the District Council make provisions in the wording of the Policy to allow for changes in the event that future policy on car parking standards need to reflect the County standard, following the completion of the County Council review.

8.0 Economic Development: Policies ED3 - Existing Employment Land ED4 - Future Employment Allocations

8.1 In respect of Policies ED3 and ED4, Swan Hill notes that they have changed considerably since the October 2008 Preferred Options document, in that they are site specific regarding the location of the proposed redevelopment of existing employment sites. These four sites are also identified in Policy H1 - Efficient Use of Land, and in general, Swan Hill supports the approach to the redevelopment of these sites (where feasible) based on the assessments of the sites set out in this version of the Core Strategy.

8.2 However, Swan Hill has concerns that these policies might not be considered suitably sound given that insufficient opportunity has been allocated for consultation on their redevelopment. Without the SHLAA being publically available prior to the consultation on this Core Strategy, an insufficient evidence base has been provided to corroborate that these sites are neither suitable or deliverable to meet the test of soundness requirements.

Summary:

Policies CLT5 - Open Space;
CLT7 - Play Space;
CLT8 - Youth Facilities; and,
CLT10 - Playing Pitches

Core Strategy Submission Document

S - 16887 - 8329 - Policy CLT7 - Play Space - None

16887 Support

CHAPTER 9 Policy CLT7 - Play Space

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Change to Plan N/A

Appear at exam? Not Specified

Soundness Tests N/A

Core Strategy Submission Document

S - 16054 - 14107 - Youth Facilities - None

16054 Support

CHAPTER 9 Youth Facilities

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: This is a good policy. We need to ensure that proper consultation is carried out with young people; not by those who think they know what young people want. Once projects are identified, they must be acted upon quickly with prompt implementation. Trends are apt to change before new facilities are introduced.

Summary: This is a good policy. We need to ensure that proper consultation is carried out with young people; not by those who think they know what young people want. Once projects are identified, they must be acted upon quickly with prompt implementation. Trends are apt to change before new facilities are introduced.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16172 - 14107 - Policy CLT8 - Youth Facilities - None

16172 Support

CHAPTER 9 Policy CLT8 - Youth Facilities

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: This is a good policy. We need to ensure that proper consultation is carried out with young people; not by those who think they know what young people want. Once projects are identified, they must be acted upon quickly with prompt implementation. Trends are apt to change before new facilities are introduced.

Summary: This is a good policy. We need to ensure that proper consultation is carried out with young people; not by those who think they know what young people want. Once projects are identified, they must be acted upon quickly with prompt implementation. Trends are apt to change before new facilities are introduced.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16888 - 8329 - Policy CLT8 - Youth Facilities - None

16888 Support

CHAPTER 9 Policy CLT8 - Youth Facilities

Respondent: Swan Hill Homes Limited [8329]

Swan Hill Homes Limited
C/O Agent
Mr P Kneen
Charles Planning

Agent: Charles Planning Associates Ltd (Mr P Kneen) [5040]

Charles Planning Associates Ltd
1644-1645 Parkway
Solent Business Park
Whiteley
Fareham
Hampshire
PO15 7AH
01489 580853

Full Text:

1.0 Instruction and Introduction

1.1 Charles Planning Associates Limited (Chartered Town Planners) is Instructed by Swan Hill Homes Limited (Swan Hill) to prepare and submit representations on their behalf in respect of the Rochford District Local Development Framework: Core Strategy Submission (September 2009) Development Plan Document.

1.2 The comments refer to the relevant sections and policy designations in the Submission document, as appropriate.

1.3 The comments set out in this submission are intended to assist the District Council in taking forward its Local Development Framework. It is our intention to continue to be involved in the LDF preparation process and we look forward to the opportunity to comment further at the Examination to the Core Strategy.

1.4 If you have any queries regarding the content of this submission then please do not hesitate to contact:

Peter Kneen BSc (Hons) MSc MRTPI
Planner

2.0 Housing:
Policy H1 - The Efficient Use of Land for Housing

2.1 Swan Hill recognises the importance of seeking to concentrate new developments mainly in the existing urban areas, on previously developed land where possible, particularly in view of the Government seeking to ensure 60% of all such new developments are on previously development land (PDL).

2.2 However, given the character of the District, and the strategic housing requirement of the East of England Plan, Swan Hill supports the approach that the Council must also make provision for additional development on the edge of existing settlements on greenfield sites, particularly in the most sustainable locations. As such, Swan Hill supports that where feasible, the redevelopment of existing employment sites for residential/employment purposes can make a contribution towards the strategic housing requirement, provided that sufficient additional employment land is brought forward to ensure the stability of employment levels in the District, and to ensure employment growth meets the East of England Plan requirements.

2.3 Swan Hill considers that Policy H1 should include consideration that new extensions to existing settlements have regard to their potential impact on the wider characteristics and openness objectives of the Green Belt.

Policy H2 - Extensions to Residential Envelopes and Phasing

2.4 Swan Hill generally supports the approach taken by the Council in this policy. As set out above, Swan Hill consider the Council's acknowledgment that housing requirements should be met through the allocation of land on the edge of the existing settlements is the most suitable way forward to meeting the Council's strategic housing requirement and complies with the advice in PPS3.

2.5 The need for suitable greenfield urban extensions represents the best way forward for the Council to meet its strategic housing requirement, as set out in the East of England Plan. Swan Hill supports the recognition that the potential supply of alternative previously developed sites is limited, without detrimentally affecting the character of the District, and therefore the best way forward is the use of sustainable greenfield urban extensions to the existing settlements of the District.

2.6 However, Swan Hill consider that a fundamental consideration that the District Council should consider relates to the potential impact of the urban extensions on the Green Belt policy has been somewhat overlooked. The wider sustainability credentials of the settlements of the District should only be one of many key considerations for determining the level of expansion. In view of the proximity of Southend-on-Sea to all the main settlements of the District, and the influence this has on the likely location many people would travel for employment and leisure, sustainability of many of the settlements is not a key overarching factor, and greater weight should be placed on the potential impact on the openness of the Green Belt, as this cannot be remedied if development occurs in the wrong location.

2.7 As such, Swan Hill considers that determining the location of growth for the main settlements should be to identify

16888 Support

CHAPTER 9 Policy CLT8 - Youth Facilities

those locations where the impact on the wider setting of the Green Belt can be minimised. Further justification for those general locations chosen should be identified in Policy H2. In this regard, Swan Hill has serious concerns regarding the removal of Land South West of Great Wakering as a viable option for the growth of the settlement. The development of this area of Great Wakering, in addition to the potential redevelopment of the Star Lane Industrial Estate could provide a more comprehensive development, whilst ensuring that the wider openness of the Green Belt is maintained. Land South West of Great Wakering is significantly better placed to limit the impact on the wider Green Belt than Land West of Great Wakering, and could contribute to the provision of an important amenity and wildlife site for the local community.

2.8 In addition, Swan Hill consider that the Council now has no reserve provision in the event that any of the existing employment sites set out in Policy H1 fail to come forward for development within the envisaged timescale. Further, Land West of Great Wakering has not been identified in the SHLAA as a deliverable site to help meet the strategic housing requirement, contrary to the requirement set out in PPS3.

2.9 As such, Swan Hill would support the provision of suitable sites which could be safeguarded for future development in the likelihood of a shortfall in supply.

Policy H3 - Extensions to Residential Envelopes Post 2021

2.10 As set out above, Swan Hill supports the overall approach the Council has taken towards the provision of sustainable urban extensions as a suitable means of meeting their strategic housing requirement. However, as set out for Policy H2 above, Swan Hill has serious concerns regarding the removal of several proposed sites set out in the October 2008 Preferred Options Core Strategy, without any guarantee of the ability to deliver those sites set out in Policy H1.

2.11 As also considered above, the inclusion of West of Great Wakering for 250 dwellings should not be included ahead of South West of Great Wakering, in view of the fact that the site is not identified in the SHLAA as available, suitable and achievable as required by PPS3, and thus is not supported by a robust and creditable evidence base for its inclusion as a strategic site for development.

2.12 Whilst Swan Hill acknowledge that alterations to Policy H1 has resulted in the removal of some locations for growth in Policy H3 (as set out in the Sustainability Appraisal), Swan Hill does not consider that the most appropriate locations have been chosen.

2.13 In addition to the matters raised above, the use of West of Great Wakering would also result in the loss of valuable agricultural land, which clearly in a Green Belt location, should be less suitable for development than other sites, such as South West of Great Wakering, which would have limited impact on the wider Green Belt policy, and not result in the loss of valuable agricultural land.

2.14 Finally, in respect of Policies H1, H2 and H3, all of the above comments are based on our interpretation of the Submission Version Core Strategy when compared to the October 2008 Version of the Core Strategy. Without the ability to undertake a detailed assessment of the Council's SHLAA, it is not possible to clarify the proposed Core Strategy position regarding the proposed direction of growth proposed for the settlements in the District. As such, Swan Hill reserves the right to make additional representations regarding the proposed Policies H1, H2 and H3 following the publication of the SHLAA in due course.

Policy H4 - Affordable Housing

2.15 In general terms, Swan Hill supports the approach taken by the Council towards the provision of affordable housing for new residential developments. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H5 - Dwelling Types

2.16 Swan Hill supports the policy provision of H5, and considers that the approach taken by the Council for this policy represents a suitably flexible alternative to stipulating percentages of dwelling mix, sought by some local authorities. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H6 - Lifetime Homes

2.17 In regard to this policy, Swan Hill objects to the Council's policy where all new dwellings should be provided to the Lifetime Homes Standard. Whilst it is acknowledged that the UK has an aging population, Swan Hill considers that seeking to provide Lifetime Homes on all sites is considered to be overly onerous for proposed developers, particularly when considering the requirement for all car parking spaces to be suitable for disabled users, which could result in more schemes becoming unviable. Therefore, the provision of a percentage of Lifetime Homes should be considered through negotiations with the Council at the planning application stage, and should be determined on a case-by-case basis.

3.0 Character of Place: Policy CP1 - Design

16888 Support

CHAPTER 9 Policy CLT8 - Youth Facilities

3.1 The Town and Country Planning (General Development Procedure) Order 1995 (As Amended) makes the submission of a Design and Access Statement for most types of planning applications a Statutory requirement, and as such, the provision of a Design Brief represents a pre-requisite of all major planning applications.

3.2 Policy CP1 seeks to ensure the provision of good, high quality developments that reflect local characteristics and distinctiveness, this ideology is supported by Swan Hill.

4.0 The Green Belt:
Policy GB1 - Green Belt Protection

4.1 Following the amendments to the wording of the Policy since the October 2008 Preferred Options Core Strategy, Swan Hill is now generally supportive of Policy GB1 and its supporting text. However, as expressed above, it is important that where alterations to the Green Belt boundary occur as a result of the extension of the settlements to meet the strategic housing requirement, both the minimal amount of land is taken and where that land is taken for development, it represents the best available land which has a minimal impact of the wider openness characteristic of the Green Belt.

5.0 Environmental Issues:
Policy ENV3 - Flood Risk

5.1 Swan Hill generally supports the approach set out in Policy ENV3 regarding ensuring development accords with the sequential test of PPS25. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV4 - Sustainable Drainage Systems (SUDS)

5.2 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV4. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV8 - On-site Renewable and Low Carbon Energy Generation

5.3 Whilst Swan Hill recognises the importance of reducing carbon emissions, particularly in new housing developments, and the role this can play in reducing the nations overall Greenhouse emissions. As such Swan Hill is generally supportive of Policy ENV8. It is noted that Policy ENG1 of the East of England Plan sets out a threshold of developments comprising 10 or more dwellings. Swan Hill consider it important for the District Council to justify the reduction in the threshold level.

5.4 Further, no assessment of Policy ENV8 has been set out in the Sustainability Appraisal which justifies the change in threshold from that of Policy ENG1 of the RSS.

Policy ENV9 - Code for Sustainable Homes

5.5 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV9. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

6.0 Community Infrastructure, Leisure and Tourism:
Policy CLT1 - Planning Obligations and Standard Charges

6.1 Swan Hill generally supports the overall approach the Council has taken in Policy CLT1. It is considered Policy CLT1 sets out a degree of flexibility to ensure that all sites are considered on a site-by-site basis, assessing the individual merits of each planning application, in order to ensure the levels of contributions applicable meet the five tests of Circular 05/05. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policies CLT5 - Open Space;
CLT7 - Play Space;
CLT8 - Youth Facilities; and,
CLT10 - Playing Pitches

6.2 Swan Hill supports the need for new residential developments to incorporate a degree of new publicly accessible open space, children's play space, youth facilities and playing pitches, and as such, generally supports the policy approaches taken by the Council.

6.3 However, it is important that whilst the Council may seek to undertake an assessment of providing standard charges for new development, which, as set out in Policy CLT1, this should be based on thorough public consultation and consideration and sound justification. Swan Hill consider that within the provision of a standard charge, it is important that such provision allows for a degree of flexibility to ensure that each site is assessed individually and on its own merits. This is particularly important for those sites close to existing open spaces and facilities. As such, the levels of

16888 Support

CHAPTER 9 Policy CLT8 - Youth Facilities

open space and recreation facilities required in the 'standard charge' should be based on an up-to-date PPG17 Open Space assessment, which should be used to form a key consideration in the levels of provision likely to be required in the standard charge system proposed.

7.0 Transport: Policy T1 - Highways

7.1 Swan Hill supports the overall objectives set out in Policy T1 requiring developments to be located and designed to reduce the reliance on the private car and to meet the infrastructure needs generated by development or seek to help achieve these needs is acceptable in principle.

7.2 Swan Hill recognises the importance of providing sufficient infrastructure provision to meet the requirements of development, and that where developments have insufficient consideration of impact on existing infrastructure, they should be considered unacceptable and contrary to National policy guidance. However, Swan Hill considers it important to emphasise that the developer's role should not be seen as a means to meet existing shortfalls in provision.

Policy T3 - Public Transport

7.3 Swan Hill is generally supportive of the policy approach set out in T3, however, as set out in paragraph 7.2 above, it is important that the District Council do not consider that it is the developer's responsibility to resolve existing shortfalls in provision of public transport, and any contribution towards additional public transportation provision should only be to mitigate against the additional level of demand likely from the development proposed.

Policy T5 - Cycling and Walking

7.4 Swan Hill supports the general approach to this policy, as Swan Hill recognises the importance of promoting the use of alternatives to the private car. The policy provision acknowledges the need to ensure relevant contributions in the event of additional travel demands generated by individual developments, whilst also setting out additional aspirations for the cycle network in the District.

7.5 As such, Swan Hill considers this policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy T8 - Parking Standards

7.6 The Council has recently (January 2007) adopted SPD on the requirements for parking standards, and as such, Swan Hill generally supports the policy approach chosen by the Council. As set out in the SPD, whilst Swan Hill generally supports the approach taken by the District Council towards setting residential parking standards, in that the Council has recognised that in the suburban areas, even with some access to public transport, the majority of residents will rely on the use of private cars. However, Swan Hill has concerns over the failure of the District Council to comply with the provisions of PPG13: Transport (2001) which sets out that Local Planning Authorities should not set minimum standards for car parking. Whilst it is acknowledged that PPS3 sets out provision for the consideration of local circumstances, it is considered that the Council has not justified this deviation from PPG13's maximum standard.

7.7 Whilst it is acknowledged that such justification may become apparent through the work currently being undertaken by Essex County Council, until such time, the District Council should only seek to apply the maximum standards indicated in PPG13. However, Swan Hill recommends that the District Council make provisions in the wording of the Policy to allow for changes in the event that future policy on car parking standards need to reflect the County standard, following the completion of the County Council review.

8.0 Economic Development: Policies ED3 - Existing Employment Land ED4 - Future Employment Allocations

8.1 In respect of Policies ED3 and ED4, Swan Hill notes that they have changed considerably since the October 2008 Preferred Options document, in that they are site specific regarding the location of the proposed redevelopment of existing employment sites. These four sites are also identified in Policy H1 - Efficient Use of Land, and in general, Swan Hill supports the approach to the redevelopment of these sites (where feasible) based on the assessments of the sites set out in this version of the Core Strategy.

8.2 However, Swan Hill has concerns that these policies might not be considered suitably sound given that insufficient opportunity has been allocated for consultation on their redevelopment. Without the SHLAA being publically available prior to the consultation on this Core Strategy, an insufficient evidence base has been provided to corroborate that these sites are neither suitable or deliverable to meet the test of soundness requirements.

Summary:

Policies CLT5 - Open Space;
CLT7 - Play Space;
CLT8 - Youth Facilities; and,
CLT10 - Playing Pitches

Core Strategy Submission Document

S - 16888 - 8329 - Policy CLT8 - Youth Facilities - None

16888 Support

CHAPTER 9 Policy CLT8 - Youth Facilities

6.2 Swan Hill supports the need for new residential developments to incorporate a degree of new publicly accessible open space, children's play space, youth facilities and playing pitches, and as such, generally supports the policy approaches taken by the Council.

6.3 However, it is important that whilst the Council may seek to undertake an assessment of providing standard charges for new development, which, as set out in Policy CLT1, this should be based on thorough public consultation and consideration and sound justification. Swan Hill consider that within the provision of a standard charge, it is important that such provision allows for a degree of flexibility to ensure that each site is assessed individually and on its own merits. This is particularly important for those sites close to existing open spaces and facilities. As such, the levels of open space and recreation facilities required in the 'standard charge' should be based on an up-to-date PPG17 Open Space assessment, which should be used to form a key consideration in the levels of provision likely to be required in the standard charge system proposed.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16055 - 14107 - Leisure Facilities - None

16055 Support

CHAPTER 9 Leisure Facilities

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: National Playing Field status should be sought where possible for playing pitches and recreation grounds

Summary: National Playing Field status should be sought where possible for playing pitches and recreation grounds

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 15777 - 10779 - Policy CLT9 - Leisure Facilities - i, iii

15777 Object

CHAPTER 9 Policy CLT9 - Leisure Facilities

Respondent: Sport England (East Region) (Mr Roy Warren) **Agent:** N/A
[10779]

Sport England (East Region)
Crescent House
19 The Crescent
Bedford
MK40 2QP
UK
0207 273 1831

Full Text: Policy is not considered to meet justified or national policy consistency criteria for following reasons:
Lack of robust evidence base to underpin policy. The Rochford Retail and Leisure Study is not considered to accord with guidance in PPG17 with respect to leisure/sports facilities as lack of detailed quantitative audits/assessments of all facilities in district as advocated in PPG17 guidance and assessment dependent on general household survey results rather than local consultation and use of strategic sports/leisure planning tools. Without such evidence base, difficult to justify protection of existing facilities, provision of new facilities and developer contributions.

Summary: Policy is not considered to meet justified or national policy consistency criteria for following reasons:
Lack of robust evidence base to underpin policy. The Rochford Retail and Leisure Study is not considered to accord with guidance in PPG17 with respect to leisure/sports facilities as lack of detailed quantitative audits/assessments of all facilities in district as advocated in PPG17 guidance and assessment dependent on general household survey results rather than local consultation and use of strategic sports/leisure planning tools. Without such evidence base, difficult to justify protection of existing facilities, provision of new facilities and developer contributions.

Change to Plan Revised assessment of sports/leisure needs to be undertaken which fully accords with PPG17 guidance and incorporates adequate consultation with stakeholders and use of established assessment tools. Sport England can provide further advice.

Appear at exam? No **Soundness Tests** i, iii

Core Strategy Submission Document

O - 15778 - 10779 - Policy CLT9 - Leisure Facilities - ii, iii

15778 Object

CHAPTER 9 Policy CLT9 - Leisure Facilities

Respondent: Sport England (East Region) (Mr Roy Warren) **Agent:** N/A
[10779]

Sport England (East Region)
Crescent House
19 The Crescent
Bedford
MK40 2QP
UK
0207 273 1831

Full Text: While the content of this policy is partially supported, there is a concern that no guidance is provided on the criteria for assessing proposals involving new leisure facilities or development affecting existing facilities. Therefore not considered to accord with the soundness criteria relating to effectiveness as difficult to use in development control. Also guidance in PPG17 sets out the considerations for assessing new leisure facilities and proposals affecting existing facilities.

Summary: While the content of this policy is partially supported, there is a concern that no guidance is provided on the criteria for assessing proposals involving new leisure facilities or development affecting existing facilities. Therefore not considered to accord with the soundness criteria relating to effectiveness as difficult to use in development control. Also guidance in PPG17 sets out the considerations for assessing new leisure facilities and proposals affecting existing facilities.

Change to Plan The policy or supporting text to incorporate guidance for assessing proposals involving new leisure facilities or proposals affecting existing facilities in order to ensure that the policy is effective when used for development control.

Appear at exam? No **Soundness Tests** ii, iii

Core Strategy Submission Document

O - 16097 - 7336 - Policy CLT9 - Leisure Facilities - i

16097 Object

CHAPTER 9 Policy CLT9 - Leisure Facilities

Respondent: Rayleigh Town Council (Mrs K Cumberland) [7336] **Agent:** N/A

Rayleigh Town Council
The Pavilion
King George V Playing Field
Bull Lane
Rayleigh
Essex
SS6 8JD

01268 741880

Full Text: Policy CLT9 The second paragraph should be made more specific, in particular seeking the provision of a swimming pool at the Rayleigh Leisure Centre by means of developer contributions.

Summary: Policy CLT9 The second paragraph should be made more specific, in particular seeking the provision of a swimming pool at the Rayleigh Leisure Centre by means of developer contributions.

Change to Plan see above

Appear at exam? No **Soundness Tests** i

Core Strategy Submission Document

S - 16167 - 14107 - Policy CLT9 - Leisure Facilities - None

16167 Support

CHAPTER 9 Policy CLT9 - Leisure Facilities

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: National Playing Field status should be sought where possible for playing pitches and recreation grounds

Summary: National Playing Field status should be sought where possible for playing pitches and recreation grounds

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16563 - 7428 - Policy CLT9 - Leisure Facilities - i, ii

16563 Object

CHAPTER 9 Policy CLT9 - Leisure Facilities

Respondent: The Theatres Trust (Ms R Freeman) [7428]

The Theatres Trust
22 Charing Cross Road
London
WC2H 0QL
020 7836 8591

Agent: N/A

Full Text: Core Strategy Submission

Thank you for your email of 21 September consulting The Theatres Trust on the Core Strategy Submission.

The Theatres Trust is the national advisory public body for theatres and a statutory consultee on planning applications affecting land on which there is a theatre. This applies to all theatre buildings, old and new, in current use, in other uses, or disused. Established by The Theatres Trust Act 1976 'to promote the better protection of theatres', our main objective is to safeguard theatre use, or the potential for such use but we also provide expert advice on design, conservation, property and planning matters to theatre operators, local authorities and official bodies.

Due to the specific nature of the Trust's remit we are concerned with the protection and promotion of theatres and therefore anticipate policies relating to cultural facilities.

Tests of Soundness

We do not find this document to be sound as it does not reflect your Cultural Strategy which is listed as a District Strategy on page 23, nor do we believe it will be effective.

Reasons

The Core Strategy does not address the issues raised in the Cultural Strategy:

Cultural Strategy page 5 - We have already mentioned that culture effects us all on a daily basis, so it is essential that we do not leave future developments to chance. By creating this strategy and continuing the evaluation and development of the action plans, we can ensure that all gaps in provision, opportunities, demands and aspirations, priorities and partners, are identified and acted upon.

Cultural Strategy page 12 - Lack of cultural facilities in the district was also highlighted, including no specific museum or live music and performance focused space, as well as a frustration regarding the lack of cohesive communication about all opportunities in the district.

Policy CLT9 Leisure Facilities only deals with sport and recreation, according to the accompanying text. Policy CLT6 Community Facilities does not include a description of what facilities are included in the policy and there is not Glossary for the document. It is therefore unclear where the issue of the lack of cultural facilities is attended to in the document. The most likely location for cultural facilities would be Rayleigh Town Centre but its Policy RTC4 only states that an Area Action Plan will provide a range of evening uses. The deferring of development implementations to subsequent planning documents places the reliance on these other documents to make the important decisions. The Core Strategy will set the scene for more detailed guidance but should be able to stand on its own.

The document lacks a clear spatial focus and there are few specifics as to the scale of development, the range and mix of uses, how they relate to each other and the infrastructure necessary to achieve this.

Core Strategy Submission Document

16563 Object

CHAPTER 9 Policy CLT9 - Leisure Facilities

The policies seem to be a set of generalities lacking any real analysis of the area and the key challenges facing the District. The wording of policies needs to be robust and clear because of the way they determine whether or not, and how development can take place.

Summary: The Core Strategy does not address the issues raised in the Cultural Strategy:

Cultural Strategy page 5 - We have already mentioned that culture effects us all on a daily basis, so it is essential that we do not leave future developments to chance. By creating this strategy and continuing the evaluation and development of the action plans, we can ensure that all gaps in provision, opportunities, demands and aspirations, priorities and partners, are identified and acted upon.

Cultural Strategy page 12 - Lack of cultural facilities in the district was also highlighted, including no specific museum or live music and performance focused space, as well as a frustration regarding the lack of cohesive communication about all opportunities in the district.

Policy CLT9 Leisure Facilities only deals with sport and recreation, according to the accompanying text. Policy CLT6 Community Facilities does not include a description of what facilities are included in the policy and there is not Glossary for the document. It is therefore unclear where the issue of the lack of cultural facilities is attended to in the document. The most likely location for cultural facilities would be Rayleigh Town Centre but its Policy RTC4 only states that an Area Action Plan will provide a range of evening uses. The deferring of development implementations to subsequent planning documents places the reliance on these other documents to make the important decisions. The Core Strategy will set the scene for more detailed guidance but should be able to stand on its own.

The document lacks a clear spatial focus and there are few specifics as to the scale of development, the range and mix of uses, how they relate to each other and the infrastructure necessary to achieve this.

The policies seem to be a set of generalities lacking any real analysis of the area and the key challenges facing the District. The wording of policies needs to be robust and clear because of the way they determine whether or not, and how development can take place.

Change to Plan

Appear at exam?	Not Specified	Soundness Tests	i, ii
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Core Strategy Submission Document

S - 15994 - 13441 - Playing Pitches, 9.47 - None

15994 Support

CHAPTER 9 Playing Pitches, 9.47

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: It would aid clarity to explain that the Council expects to adopt its Playing Pitches SPD in January 2010

Summary: It would aid clarity to explain that the Council expects to adopt its Playing Pitches SPD in January 2010

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 15779 - 10779 - Policy CLT10 - Playing Pitches - iii

15779 Object

CHAPTER 9 Policy CLT10 - Playing Pitches

Respondent: Sport England (East Region) (Mr Roy Warren) **Agent:** N/A
[10779]

Sport England (East Region)
Crescent House
19 The Crescent
Bedford
MK40 2QP
UK
0207 273 1831

Full Text: Does not accord with soundness criteria relating to accordance with national policy as criteria for playing pitch provision in Green Belt does not accord with PPG2. Paragraph 1.6 of PPG2 advises that providing opportunities for outdoor sport is one of the objectives of use of land in the Green Belt. Consequently, no requirement to demonstrate a need for additional playing pitches as it is not inappropriate development in Green Belt.

Summary: Does not accord with soundness criteria relating to accordance with national policy as criteria for playing pitch provision in Green Belt does not accord with PPG2. Paragraph 1.6 of PPG2 advises that providing opportunities for outdoor sport is one of the objectives of use of land in the Green Belt. Consequently, no requirement to demonstrate a need for additional playing pitches as it is not inappropriate development in Green Belt.

Change to Plan Omit the requirement for a need for additional playing pitches to be demonstrated as thus does not accord with Government policy.

Appear at exam? No **Soundness Tests** iii

Core Strategy Submission Document

O - 15780 - 10779 - Policy CLT10 - Playing Pitches - iii

15780 Object

CHAPTER 9 Policy CLT10 - Playing Pitches

Respondent: Sport England (East Region) (Mr Roy Warren)
[10779]
Sport England (East Region)
Crescent House
19 The Crescent
Bedford
MK40 2QP
UK
0207 273 1831

Agent: N/A

Full Text: Does not meet effective or accordance with national policy soundness criteria . This is because reference is made to it being acceptable for playing fields to be developed if it can be demonstrated that the site is not viable for use as playing pitch. However this is ambiguous as unclear what is meant by viable for use and does not accord with PPG17 (para 15) on development affecting playing fields which does not include any criteria relating to viability. This has potential to misinterpreted by developers e.g. any former playing field could be claimed to be unviable.

Summary: Does not meet effective or accordance with national policy soundness criteria . This is because reference is made to it being acceptable for playing fields to be developed if it can be demonstrated that the site is not viable for use as playing pitch. However this is ambiguous as unclear what is meant by viable for use and does not accord with PPG17 (para 15) on development affecting playing fields which does not include any criteria relating to viability. This has potential to misinterpreted by developers e.g. any former playing field could be claimed to be unviable.

Change to Plan Delete reference to the loss of existing playing pitches being resisted unless it can be clearly demonstrated that the site is not viable for use as a playing pitch. Suggest that this is replaced with unless an assessment of playing pitche needs has been undertaken which has clearly shown the playing pitch to be surplus to requirements because this would accord with PPG17 and Sport England playing fields policy and may have been what was intended.

Appear at exam? No **Soundness Tests** iii

Core Strategy Submission Document

S - 16056 - 14107 - Policy CLT10 - Playing Pitches - None

16056 Support

CHAPTER 9 Policy CLT10 - Playing Pitches

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: National Playing Field status should be sought where possible for playing pitches and recreation grounds

Summary: National Playing Field status should be sought where possible for playing pitches and recreation grounds

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16889 - 8329 - Policy CLT10 - Playing Pitches - None

16889 Support

CHAPTER 9 Policy CLT10 - Playing Pitches

Respondent: Swan Hill Homes Limited [8329]

Swan Hill Homes Limited
C/O Agent
Mr P Kneen
Charles Planning

Agent: Charles Planning Associates Ltd (Mr P Kneen) [5040]

Charles Planning Associates Ltd
1644-1645 Parkway
Solent Business Park
Whiteley
Fareham
Hampshire
PO15 7AH
01489 580853

Full Text:

1.0 Instruction and Introduction

1.1 Charles Planning Associates Limited (Chartered Town Planners) is Instructed by Swan Hill Homes Limited (Swan Hill) to prepare and submit representations on their behalf in respect of the Rochford District Local Development Framework: Core Strategy Submission (September 2009) Development Plan Document.

1.2 The comments refer to the relevant sections and policy designations in the Submission document, as appropriate.

1.3 The comments set out in this submission are intended to assist the District Council in taking forward its Local Development Framework. It is our intention to continue to be involved in the LDF preparation process and we look forward to the opportunity to comment further at the Examination to the Core Strategy.

1.4 If you have any queries regarding the content of this submission then please do not hesitate to contact:

Peter Kneen BSc (Hons) MSc MRTPI
Planner

2.0 Housing:
Policy H1 - The Efficient Use of Land for Housing

2.1 Swan Hill recognises the importance of seeking to concentrate new developments mainly in the existing urban areas, on previously developed land where possible, particularly in view of the Government seeking to ensure 60% of all such new developments are on previously development land (PDL).

2.2 However, given the character of the District, and the strategic housing requirement of the East of England Plan, Swan Hill supports the approach that the Council must also make provision for additional development on the edge of existing settlements on greenfield sites, particularly in the most sustainable locations. As such, Swan Hill supports that where feasible, the redevelopment of existing employment sites for residential/employment purposes can make a contribution towards the strategic housing requirement, provided that sufficient additional employment land is brought forward to ensure the stability of employment levels in the District, and to ensure employment growth meets the East of England Plan requirements.

2.3 Swan Hill considers that Policy H1 should include consideration that new extensions to existing settlements have regard to their potential impact on the wider characteristics and openness objectives of the Green Belt.

Policy H2 - Extensions to Residential Envelopes and Phasing

2.4 Swan Hill generally supports the approach taken by the Council in this policy. As set out above, Swan Hill consider the Council's acknowledgment that housing requirements should be met through the allocation of land on the edge of the existing settlements is the most suitable way forward to meeting the Council's strategic housing requirement and complies with the advice in PPS3.

2.5 The need for suitable greenfield urban extensions represents the best way forward for the Council to meet its strategic housing requirement, as set out in the East of England Plan. Swan Hill supports the recognition that the potential supply of alternative previously developed sites is limited, without detrimentally affecting the character of the District, and therefore the best way forward is the use of sustainable greenfield urban extensions to the existing settlements of the District.

2.6 However, Swan Hill consider that a fundamental consideration that the District Council should consider relates to the potential impact of the urban extensions on the Green Belt policy has been somewhat overlooked. The wider sustainability credentials of the settlements of the District should only be one of many key considerations for determining the level of expansion. In view of the proximity of Southend-on-Sea to all the main settlements of the District, and the influence this has on the likely location many people would travel for employment and leisure, sustainability of many of the settlements is not a key overarching factor, and greater weight should be placed on the potential impact on the openness of the Green Belt, as this cannot be remedied if development occurs in the wrong location.

2.7 As such, Swan Hill considers that determining the location of growth for the main settlements should be to identify

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S - 16889 - 8329 - Policy CLT10 - Playing Pitches - None

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CHAPTER 9 Policy CLT10 - Playing Pitches

those locations where the impact on the wider setting of the Green Belt can be minimised. Further justification for those general locations chosen should be identified in Policy H2. In this regard, Swan Hill has serious concerns regarding the removal of Land South West of Great Wakering as a viable option for the growth of the settlement. The development of this area of Great Wakering, in addition to the potential redevelopment of the Star Lane Industrial Estate could provide a more comprehensive development, whilst ensuring that the wider openness of the Green Belt is maintained. Land South West of Great Wakering is significantly better placed to limit the impact on the wider Green Belt than Land West of Great Wakering, and could contribute to the provision of an important amenity and wildlife site for the local community.

2.8 In addition, Swan Hill consider that the Council now has no reserve provision in the event that any of the existing employment sites set out in Policy H1 fail to come forward for development within the envisaged timescale. Further, Land West of Great Wakering has not been identified in the SHLAA as a deliverable site to help meet the strategic housing requirement, contrary to the requirement set out in PPS3.

2.9 As such, Swan Hill would support the provision of suitable sites which could be safeguarded for future development in the likelihood of a shortfall in supply.

Policy H3 - Extensions to Residential Envelopes Post 2021

2.10 As set out above, Swan Hill supports the overall approach the Council has taken towards the provision of sustainable urban extensions as a suitable means of meeting their strategic housing requirement. However, as set out for Policy H2 above, Swan Hill has serious concerns regarding the removal of several proposed sites set out in the October 2008 Preferred Options Core Strategy, without any guarantee of the ability to deliver those sites set out in Policy H1.

2.11 As also considered above, the inclusion of West of Great Wakering for 250 dwellings should not be included ahead of South West of Great Wakering, in view of the fact that the site is not identified in the SHLAA as available, suitable and achievable as required by PPS3, and thus is not supported by a robust and creditable evidence base for its inclusion as a strategic site for development.

2.12 Whilst Swan Hill acknowledge that alterations to Policy H1 has resulted in the removal of some locations for growth in Policy H3 (as set out in the Sustainability Appraisal), Swan Hill does not consider that the most appropriate locations have been chosen.

2.13 In addition to the matters raised above, the use of West of Great Wakering would also result in the loss of valuable agricultural land, which clearly in a Green Belt location, should be less suitable for development than other sites, such as South West of Great Wakering, which would have limited impact on the wider Green Belt policy, and not result in the loss of valuable agricultural land.

2.14 Finally, in respect of Policies H1, H2 and H3, all of the above comments are based on our interpretation of the Submission Version Core Strategy when compared to the October 2008 Version of the Core Strategy. Without the ability to undertake a detailed assessment of the Council's SHLAA, it is not possible to clarify the proposed Core Strategy position regarding the proposed direction of growth proposed for the settlements in the District. As such, Swan Hill reserves the right to make additional representations regarding the proposed Policies H1, H2 and H3 following the publication of the SHLAA in due course.

Policy H4 - Affordable Housing

2.15 In general terms, Swan Hill supports the approach taken by the Council towards the provision of affordable housing for new residential developments. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H5 - Dwelling Types

2.16 Swan Hill supports the policy provision of H5, and considers that the approach taken by the Council for this policy represents a suitably flexible alternative to stipulating percentages of dwelling mix, sought by some local authorities. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H6 - Lifetime Homes

2.17 In regard to this policy, Swan Hill objects to the Council's policy where all new dwellings should be provided to the Lifetime Homes Standard. Whilst it is acknowledged that the UK has an aging population, Swan Hill considers that seeking to provide Lifetime Homes on all sites is considered to be overly onerous for proposed developers, particularly when considering the requirement for all car parking spaces to be suitable for disabled users, which could result in more schemes becoming unviable. Therefore, the provision of a percentage of Lifetime Homes should be considered through negotiations with the Council at the planning application stage, and should be determined on a case-by-case basis.

3.0 Character of Place: Policy CP1 - Design

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S - 16889 - 8329 - Policy CLT10 - Playing Pitches - None

16889 Support

CHAPTER 9 Policy CLT10 - Playing Pitches

3.1 The Town and Country Planning (General Development Procedure) Order 1995 (As Amended) makes the submission of a Design and Access Statement for most types of planning applications a Statutory requirement, and as such, the provision of a Design Brief represents a pre-requisite of all major planning applications.

3.2 Policy CP1 seeks to ensure the provision of good, high quality developments that reflect local characteristics and distinctiveness, this ideology is supported by Swan Hill.

4.0 The Green Belt:
Policy GB1 - Green Belt Protection

4.1 Following the amendments to the wording of the Policy since the October 2008 Preferred Options Core Strategy, Swan Hill is now generally supportive of Policy GB1 and its supporting text. However, as expressed above, it is important that where alterations to the Green Belt boundary occur as a result of the extension of the settlements to meet the strategic housing requirement, both the minimal amount of land is taken and where that land is taken for development, it represents the best available land which has a minimal impact of the wider openness characteristic of the Green Belt.

5.0 Environmental Issues:
Policy ENV3 - Flood Risk

5.1 Swan Hill generally supports the approach set out in Policy ENV3 regarding ensuring development accords with the sequential test of PPS25. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV4 - Sustainable Drainage Systems (SUDS)

5.2 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV4. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV8 - On-site Renewable and Low Carbon Energy Generation

5.3 Whilst Swan Hill recognises the importance of reducing carbon emissions, particularly in new housing developments, and the role this can play in reducing the nations overall Greenhouse emissions. As such Swan Hill is generally supportive of Policy ENV8. It is noted that Policy ENG1 of the East of England Plan sets out a threshold of developments comprising 10 or more dwellings. Swan Hill consider it important for the District Council to justify the reduction in the threshold level.

5.4 Further, no assessment of Policy ENV8 has been set out in the Sustainability Appraisal which justifies the change in threshold from that of Policy ENG1 of the RSS.

Policy ENV9 - Code for Sustainable Homes

5.5 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV9. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

6.0 Community Infrastructure, Leisure and Tourism:
Policy CLT1 - Planning Obligations and Standard Charges

6.1 Swan Hill generally supports the overall approach the Council has taken in Policy CLT1. It is considered Policy CLT1 sets out a degree of flexibility to ensure that all sites are considered on a site-by-site basis, assessing the individual merits of each planning application, in order to ensure the levels of contributions applicable meet the five tests of Circular 05/05. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policies CLT5 - Open Space;
CLT7 - Play Space;
CLT8 - Youth Facilities; and,
CLT10 - Playing Pitches

6.2 Swan Hill supports the need for new residential developments to incorporate a degree of new publicly accessible open space, children's play space, youth facilities and playing pitches, and as such, generally supports the policy approaches taken by the Council.

6.3 However, it is important that whilst the Council may seek to undertake an assessment of providing standard charges for new development, which, as set out in Policy CLT1, this should be based on thorough public consultation and consideration and sound justification. Swan Hill consider that within the provision of a standard charge, it is important that such provision allows for a degree of flexibility to ensure that each site is assessed individually and on its own merits. This is particularly important for those sites close to existing open spaces and facilities. As such, the levels of

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CHAPTER 9 Policy CLT10 - Playing Pitches

open space and recreation facilities required in the 'standard charge' should be based on an up-to-date PPG17 Open Space assessment, which should be used to form a key consideration in the levels of provision likely to be required in the standard charge system proposed.

7.0 Transport: Policy T1 - Highways

7.1 Swan Hill supports the overall objectives set out in Policy T1 requiring developments to be located and designed to reduce the reliance on the private car and to meet the infrastructure needs generated by development or seek to help achieve these needs is acceptable in principle.

7.2 Swan Hill recognises the importance of providing sufficient infrastructure provision to meet the requirements of development, and that where developments have insufficient consideration of impact on existing infrastructure, they should be considered unacceptable and contrary to National policy guidance. However, Swan Hill considers it important to emphasise that the developer's role should not be seen as a means to meet existing shortfalls in provision.

Policy T3 - Public Transport

7.3 Swan Hill is generally supportive of the policy approach set out in T3, however, as set out in paragraph 7.2 above, it is important that the District Council do not consider that it is the developer's responsibility to resolve existing shortfalls in provision of public transport, and any contribution towards additional public transportation provision should only be to mitigate against the additional level of demand likely from the development proposed.

Policy T5 - Cycling and Walking

7.4 Swan Hill supports the general approach to this policy, as Swan Hill recognises the importance of promoting the use of alternatives to the private car. The policy provision acknowledges the need to ensure relevant contributions in the event of additional travel demands generated by individual developments, whilst also setting out additional aspirations for the cycle network in the District.

7.5 As such, Swan Hill considers this policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy T8 - Parking Standards

7.6 The Council has recently (January 2007) adopted SPD on the requirements for parking standards, and as such, Swan Hill generally supports the policy approach chosen by the Council. As set out in the SPD, whilst Swan Hill generally supports the approach taken by the District Council towards setting residential parking standards, in that the Council has recognised that in the suburban areas, even with some access to public transport, the majority of residents will rely on the use of private cars. However, Swan Hill has concerns over the failure of the District Council to comply with the provisions of PPG13: Transport (2001) which sets out that Local Planning Authorities should not set minimum standards for car parking. Whilst it is acknowledged that PPS3 sets out provision for the consideration of local circumstances, it is considered that the Council has not justified this deviation from PPG13's maximum standard.

7.7 Whilst it is acknowledged that such justification may become apparent through the work currently being undertaken by Essex County Council, until such time, the District Council should only seek to apply the maximum standards indicated in PPG13. However, Swan Hill recommends that the District Council make provisions in the wording of the Policy to allow for changes in the event that future policy on car parking standards need to reflect the County standard, following the completion of the County Council review.

8.0 Economic Development: Policies ED3 - Existing Employment Land ED4 - Future Employment Allocations

8.1 In respect of Policies ED3 and ED4, Swan Hill notes that they have changed considerably since the October 2008 Preferred Options document, in that they are site specific regarding the location of the proposed redevelopment of existing employment sites. These four sites are also identified in Policy H1 - Efficient Use of Land, and in general, Swan Hill supports the approach to the redevelopment of these sites (where feasible) based on the assessments of the sites set out in this version of the Core Strategy.

8.2 However, Swan Hill has concerns that these policies might not be considered suitably sound given that insufficient opportunity has been allocated for consultation on their redevelopment. Without the SHLAA being publically available prior to the consultation on this Core Strategy, an insufficient evidence base has been provided to corroborate that these sites are neither suitable or deliverable to meet the test of soundness requirements.

Summary:

Policies CLT5 - Open Space;
CLT7 - Play Space;
CLT8 - Youth Facilities; and,
CLT10 - Playing Pitches

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S - 16889 - 8329 - Policy CLT10 - Playing Pitches - None

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CHAPTER 9 Policy CLT10 - Playing Pitches

6.2 Swan Hill supports the need for new residential developments to incorporate a degree of new publicly accessible open space, children's play space, youth facilities and playing pitches, and as such, generally supports the policy approaches taken by the Council.

6.3 However, it is important that whilst the Council may seek to undertake an assessment of providing standard charges for new development, which, as set out in Policy CLT1, this should be based on thorough public consultation and consideration and sound justification. Swan Hill consider that within the provision of a standard charge, it is important that such provision allows for a degree of flexibility to ensure that each site is assessed individually and on its own merits. This is particularly important for those sites close to existing open spaces and facilities. As such, the levels of open space and recreation facilities required in the 'standard charge' should be based on an up-to-date PPG17 Open Space assessment, which should be used to form a key consideration in the levels of provision likely to be required in the standard charge system proposed.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

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S - 16057 - 14107 - Policy CLT11 - Tourism - None

16057 Support

CHAPTER 9 Policy CLT11 - Tourism

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: We support this policy. We need to see more bed and breakfast and hotels in the area. Tourists will not visit if there is nowhere to stay. We would like to see a realistic approach to this item rather than an idealistic one

Summary: We support this policy. We need to see more bed and breakfast and hotels in the area. Tourists will not visit if there is nowhere to stay. We would like to see a realistic approach to this item rather than an idealistic one

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 15781 - 10779 - Appendix CLT1 - iii

15781 Object

CHAPTER 9 Appendix CLT1

Respondent: Sport England (East Region) (Mr Roy Warren) **Agent:** N/A
[10779]

Sport England (East Region)
Crescent House
19 The Crescent
Bedford
MK40 2QP
UK
0207 273 1831

Full Text: Not sound in terms of national policy consistency as standard charges for open space and leisure facilities only sought from residential developments. However, employment, tourism etc development also generates open space/leisure needs and PPG17 requires the needs of those working in and visiting areas to be included in assessments and planning permissions do not only apply to housing. This could result in new non-residential developments not making any provision for additional needs that they generate. Also standard charges towards open space should be expected from residential developments as not appropriate to always provide on-site e.g. playing pitches.

Summary: Not sound in terms of national policy consistency as standard charges for open space and leisure facilities only sought from residential developments. However, employment, tourism etc development also generates open space/leisure needs and PPG17 requires the needs of those working in and visiting areas to be included in assessments and planning permissions do not only apply to housing. This could result in new non-residential developments not making any provision for additional needs that they generate. Also standard charges towards open space should be expected from residential developments as not appropriate to always provide on-site e.g. playing pitches.

Change to Plan Change appendix CLT1 to allow the principle of standard charges being sought from employment developments and principle of residential developments paying standard charges towards open space. An SPD can then set out detail of what types of development charges will be sought from and what types of open space/leisure provision should be made for. Other authorities have taken this approach.

Appear at exam? No **Soundness Tests** iii

Core Strategy Submission Document

S - 15993 - 13441 - Appendix CLT1 - None

15993 Support

CHAPTER 9 Appendix CLT1

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: The Core Strategy identifies infrastructure that may form the basis of applying standard charges or negotiating planning obligations with developers.

Summary: The Core Strategy identifies infrastructure that may form the basis of applying standard charges or negotiating planning obligations with developers.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16702 - 9072 - Appendix CLT1 - i

16702 Object

CHAPTER 9 Appendix CLT1

Respondent: Essex County Council (Mr Roy Lewis) [9072] **Agent:** N/A

Essex County Council
ESH - Spatial Planning
Planning and Transport
County Hall
Chelmsford
CM1 4JU
01245-437578

Full Text: ROCHFORD CORE STRATEGY SUBMISSION DOCUMENT, SEPTEMBER 2009
RESPONSE OF ESSEX COUNTY COUNCIL

1. General Comment

Essex County Council welcomes and broadly supports the Core Strategy prepared by Rochford District Council. The Strategy contains policies and proposals that address the spatial characteristics, issues and opportunities facing the District whilst respecting the distinctive qualities of the different settlements and parts of the District.

The County Council fully supports the maintenance of a strong policy approach to protection of the Green Belt and of the quality of environmental assets in the District whilst making adequate housing and employment provision within the District. The Core Strategy presents an approach that emphasises a balance of opportunity through the District and recognition of emerging economic prospects in the District and neighbouring areas. The intended preparation of more detailed Action Area Plans for London Southend Airport and its environs and for each of the three town centres of Rayleigh, Rochford and Hockley will further enhance the approach of the Core Strategy. The emphasis on the three town centres is particularly welcomed as offering a stimulus to improvement in the services and facilities available locally within the District whilst also affording possibilities of increased community focus.

2. Housing Distribution and Locations

The East of England Plan requires Rochford to provide a minimum of 3,790 additional dwellings between 2006 and 2021. In addition, provision for a further 1,000 dwellings should be made between 2021 and 2025 to ensure delivery of housing for at least 15 years from adoption of the Core Strategy (expected in 2010). Of this total requirement the District Council has identified a capacity of 2,000 dwellings through a Strategic Housing Land Availability Assessment. This means that the Core Strategy has to identify locations for about 1,750 dwellings to be delivered before 2021 and a further 1,000 dwellings between 2021 and 2025.

Policy H1 (The efficient use of land for housing) is supported. However, prioritisation of the reuse of previously developed land within settlements for additional housing is unlikely to provide a sufficient source of provision due to the generally residential nature of existing settlements in the district and the absence of potentially large sites of previously developed land. The assessment of potential for additional housing provision within settlements already includes the proposed re-allocation to substantially residential use of 4 existing employment areas.

Within Policy H2 (Extensions to residential envelopes and phasing) and Policy H3 (Extension to residential envelopes post-2021) the District Council has adopted a balanced approach to the distribution of additional housing locations, which is based on identification of tiers of settlements defined by reference to their accessibility to jobs, services and facilities (some of which lie outside the District) and the need to protect the valued environments within the District. This approach is generally supported, although implementation and delivery of individual schemes should give further thought to securing sustainable functional relationships between proposed development locations and availability of jobs, services and facilities.

The proposed scale and phasing of development at each of the identified locations in Policy H2 and Policy H3 should be capable of being supported by County Council service groups, provided that adequate and timely funding is available. The County Council would wish to work with the District Council to ensure that future infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

3. Economic Development

The approach to Employment Growth (Policy ED1) is supported. Given the economic structure of Rochford District the support to be given to protection and enhancement of the role of small and medium sized businesses; enhancement of the District's commercial centres; and development of a skills training academy is particularly welcome. These measures will assist in building on the existing economic resource of the District.

Proposals for the comprehensive development of London Southend Airport and its environs (Policy ED2) are supported.

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CHAPTER 9 Appendix CLT1

The further elaboration of proposals through an Area Action Plan will provide a firm foundation to realise the economic regeneration and growth opportunities presented by effective use of the Airport. The recognition of the potential environmental impact of the Airport and the commitment to work to mitigate any adverse impacts on the environment and local amenities is fully supported.

The location of the proposed Eco-Enterprise Centre to the North of London Southend Airport (Policy ED4) is supported. Creation of the Centre would assist reduction of the rate of business start-up failure in the district. Further the proposed location for the Centre would afford a clear offer to businesses within an area of varied business activity.

The continued protection and enhancement of existing employment land (Policy ED3) is supported, as is the identification of 4 existing employment sites for appropriate alternative, substantially residential, uses. Each of the 4 sites affords particular issues and opportunities whereby their redevelopment for other uses and relocation of existing occupiers would confer advantage for the immediately neighbouring areas and for the District as a whole.

4. Town Centres

The town centres of Rayleigh, Rochford and Hockley, and future plans for them, are closely linked to the economic development of the District but also present the opportunity to offer greater community focus within the District. The varied approach being taken to each of these town centres is supported (Policy RTC4, RTC5 and RTC6), notably the recognition of the role and purpose of the town centres beyond retail uses.

The contribution that the County Library service could make to plans for the town centres should not be overlooked. The 5 libraries in the District are substantial footfall draws in their localities and act as a 'community anchor store'. This has knock-on effects in encouraging use of neighbouring retail and service facilities. Further the Library service is currently looking at co-location opportunities for other services within the libraries which would enable them to act as a community focus.

5. Transport

The transport aspects of the Core Strategy are well balanced in identifying potential measures that would meet the needs of existing residents and businesses in the District as well as needs arising from future development. The approach reflects and makes good reference to the transportation aspirations of the County Council. The policy emphasis on close working between the District Council and the County Council to advance the transport aspirations is welcomed and fully supported.

In relation to parking standards (Policy T8 and Paragraph 10.30) the review undertaken by Essex County Council in conjunction with the Essex Planning Officers Association has now been completed. Revised parking standards have been agreed and signed off as County Supplementary Guidance, in accordance with PPS12, and is being applied by the County Council as Local Highways Authority.

6. Coastal Protection Belt

Policy ENV2 (Coastal Protection Belt) is not supported because in its current form it is not a suitable or effective replacement policy for Policy CC1 of the Replacement Structure Plan. Structure Plan Policy CC1 (The Undeveloped Coast - Coastal Protection Belt) currently remains a 'saved' policy of the Essex and Southend-on-Sea Replacement Structure Plan, April 2001 (following a direction of the Secretary of State, dated 27th September 2007, under paragraph 1(3) of Schedule 8 to the Planning and Compulsory Purchase Act 2004). The existing Policy CC1 reads, 'Within the Coastal Protection Belt defined in adopted local plans there shall be the most stringent restrictions on development within the rural and undeveloped coastline situated outside existing built-up areas, and any development which is exceptionally permitted within this Belt shall not adversely affect the open and rural character, historic features or wildlife.'

Core Strategy Policy ENV2 should be revised to include specific reference to,

- * Definition of the boundary of the Coastal Protection Belt in another Development Plan Document;
- * the application of the most stringent restrictions on development within the rural and undeveloped coastline;
- * any development exceptionally permitted not adversely affecting the open and rural character, historic features or wildlife.

7. Historic Environment

The importance of the historic environment in Rochford District is clearly identified within the Core Strategy document. Nevertheless, the policy guidance could be usefully enhanced to promote consideration and enhancement of the historic environment and use of the historic environment to shape place. This would be achieved by the following amendments to the Core Strategy,

- * Policy ENV1 (Protection and Enhancement of the Natural Landscape and Habitats and the Protection of Historical and Archaeological Sites) should be amended by deletion of the final sentence and its replacement with, 'The Council is committed to the protection, promotion and enhancement of the diverse historic landscape and extensive surviving archaeological deposits of the District.'

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* Paragraph 8.15 of the supporting text should be amended to better support the suggested amendment to Policy ENV1. The existing text of Paragraph 8.15 should be deleted in its entirety and replaced by,
The historic environment of Rochford District has developed through a history of human activity that spans over 450,000 years. Much of the resource lies hidden beneath the ground in the form of archaeological deposits. Other elements such as the historic landscape, the pattern of field, farms, woods and grazing marsh which characterise the District, are a highly visible record of millennia of agriculture, industry and commerce. Of particular significance are the coastal, island and estuarine areas where multi-period landscapes reflecting the exploitation of coastal and marshland resource survive. The District also includes the important historic medieval market towns of Rochford and Rayleigh.

* Page 16 (Sustainable Community Strategy Priority: Promoting a Greener District) should be amended to further support the approach to the Historic Environment. The fourth bullet of the Key Section/Policies of the Core Strategy should be amended to include the word 'historic', so that the first sentence of the bullet would read,
The Environment chapter seeks to protect and enhance the biodiversity, historic and natural environment of the District by protecting sites of local, national and international importance.

8. Community Infrastructure

The approach to Community Infrastructure is supported. The County Council would wish to work with the District Council to ensure that future community infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

In addition, it should be noted that,

* Some County Council services are not highly visible despite being regarded as highly desirable community services by local residents. The need to ensure adequate funding and contributions to enable these services to meet community expectations should be recognised and acknowledged in consideration of planning obligations and standard charges.

* The Adult Community Learning Centre at Rocheway, Rochford could be better located with regard to the wider Rochford/Castle Point area of service. Relocation of the Centre could provide opportunities both at the new location and for the current site.

* The Core Strategy should make specific reference to,

o Appendix H1, Location at South Canewdon: new Early Years and Childcare facilities;

o Policy CLT2, final sentence: insert after the words 'primary schools' the words 'and Early Years and Childcare facilities';

o Appendix CLT1, Other issues/comment: for Early years and childcare facilities add 'Land to be allocated within new residential areas, as appropriate'.

9. Implementation, Delivery and Monitoring

The inclusion in the Core Strategy of a section considering Implementation, Delivery and Monitoring is welcomed and supported. Nevertheless, the District Council, in moving towards implementation and delivery of the individual elements of the Core Strategy, should highlight those schemes and projects that are critical to achievement of other aspects of the Strategy.

Further, the monitoring proposal for Policy H6 (Lifetime Homes) and for Policy CP1 (Design) should be amended,

* Policy H6 (Lifetime Homes) - the identified monitoring tool is Core Indicator H6 Housing Quality Building for Life Assessments. The Building for Life Assessment methodology was devised to measure the overall design/layout quality of housing developments. It was not devised to measure compliance with Lifetime Homes, which is largely, but not exclusively, concerned with internal space standards and the provision of internal arrangements within dwellings to meet needs of all residents.

* Policy CP1 (Design) - the monitoring indicator proposed by the Core Strategy is not supported because it is unclear what the indicator would actually be measuring. The proposed indicator should be replaced by the Core Indicator, Housing Quality - Building for Life Assessments, as suggested by the County Council in its response to the Core Strategy Preferred Options, October 2008. A better approach would be to base evaluation and monitoring of Policy CP1 on the Commission for Architecture and the Built Environment's (CABE) 20 Building for Life principles, particularly as Government has endorsed these principles and is urging local authorities to use them to assess design quality. It is suggested that the monitoring arrangements for Preferred Option CP1 be deleted and replaced by the following text, 'The success of the implementation of this policy will be monitored by assessing schemes, or an appropriate sample of schemes, against the Commission for Architecture and the Built Environment's (CABE) Building for Life principles.'

10. Access to Housing

The Core Strategy notes the higher prevalence of older people in Rochford District and the need to support them. However, a more broadly based approach to access to housing should be adopted by Policies H4, H5 and H6. It should recognise the presence of other vulnerable adults in the community, for example, those with learning or mental health disability, and the range of possible forms of accommodation, including supported, sheltered and extra care accommodation. The high level of owner occupation in the District further emphasises the need for a broader approach. The emphasis on Lifetime Homes would not address the variety of future needs, whilst the potential exemptions to the

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O - 16702 - 9072 - Appendix CLT1 - i

16702 Object

CHAPTER 9 Appendix CLT1

Summary: Lifetime Homes policy standard in Policy H6 are likely to act against demographic trends. The approach to Community Infrastructure is supported. The County Council would wish to work with the District Council to ensure that future community infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

In addition, it should be noted that,

* Some County Council services are not highly visible despite being regarded as highly desirable community services by local residents. The need to ensure adequate funding and contributions to enable these services to meet community expectations should be recognised and acknowledged in consideration of planning obligations and standard charges.

* The Adult Community Learning Centre at Rocheway, Rochford could be better located with regard to the wider Rochford/Castle Point area of service. Relocation of the Centre could provide opportunities both at the new location and for the current site.

The Core Strategy should make specific reference to,

Appendix CLT1, Other issues/comment: for Early years and childcare facilities add 'Land to be allocated within new residential areas, as appropriate'.

Change to Plan The Core Strategy should make specific reference to,

Appendix CLT1, Other issues/comment: for Early years and childcare facilities add 'Land to be allocated within new residential areas, as appropriate'.

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16717 - 7834 - Appendix CLT1 - i

16717 Object

CHAPTER 9 Appendix CLT1

Respondent: Ms G Yeadell [7834]

6 Southend Road
Hockley
Essex
SS5 4QQ
01702 205450

Agent: N/A

Full Text: Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1

Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2 you discarded N.E.Hockley as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley..along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

Response to C.S Preferred Options 2008 and HAAP 2009

June 2009 issue C S Submission issue says Eldon Way will be used for housing, whereas Sept.2009 issue says "alternative uses, including residential.." to be decided by HAAP (Issues consultation done, Pref.Options issue awaited, but judging from JAAP Pref.Options decision - namely biggest option chosen against overriding opposition, it will be housing).

Need to be logical and even-handed in proposals

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

Establish likely level of Standard Charges. Accept you cannot turn district into motorways with wholesale demolition.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

Para.10.5 "..highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which cannot be altered without much destruction.

Reply to CS Pref. Options 2008 & HAAP Issues/Options 2009

Policy T3, CLT1 Appendix CLT1 Public transport RDC admits this is in the private sector. In Hockley, operator has cut No7 service to 1 per hour from Ashingdon Schools, claiming it is unviable beyond. This is unlikely to change as Hockley is car dependant. No8 bus through Hawkwell is cut to 1 per hour to Rayleigh, for same reason as No7. Proposed planning agreements with developers can't run: eg, a community centre or classroom given by a developer remains once he has moved on - how can that apply for an on-going bus service?

Reply to Infrastructure Transport in CS Pref. Opts. 2008 and to HAAP Issues Opts. 2009.

Ch.11 Economic development

Policy ED3 Core Strategy preferred Options 2008 hinted at possible housing in Eldon Way site. June 2009 Submission version, without consultation, said Eldon Way would be housing (map included Foundry, not the text). September 2009 Submission said redevelopment would be in HAAP (which apart from the Issues/Options version, is unfinished. Judging from results of JAAP Preferred Options where biggest option is chosen, though most respondents were against it, site will be housing, without consultation.

16717 Object

CHAPTER 9 Appendix CLT1

Para.1.25, Para.11.32 Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to accommodated employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

Reply to HAAP Issues Options 2009

Remove compulsory relocation

Policy ED4 Policy states Council will allocate 18ha of land to make up for de-allocations in ED3 - that proves point above.

Proposals for moving employment to out of town locations with no existing transport links are contrary to government policies PPG4, PPS1 and PPS4 and Core Strategy Policy T1.

Evidence Base is ignored by contravening Hockley Parish Plan 2007 and ignoring residents' views on HAAP Issues/Options. Next stage of HAAP Preferred Options is pre-empted and rendered irrelevant. Core Strategy plans to relocate Eldon Way Foundry estate to Greenfield site with no nearby bus or railway. RDC plans to upgrade the nearest road to dual carriageway, though the connecting B1013 (through Hockley) will stay single, said by ECC Highways statistics to be 72% capacity. Airport bosses and council cannot suggest there will be no traffic growth from JAAP and new industrial site.

Reply to Hockley Parish Plan 2007. HAAP Issues 2009

Move to new industrial site near airport contravenes PPS4:

- EC7.3C "out of centre sites, with preference given to sites...well served by choice of...transport and...close to centre and...high likelihood of forming links with centre". There is no current public transport and links with centres is unlikely".

- EC 7.5.1 "whether the site is or will be accessible and well served by choice of transport, public transport, walking and cycling, as well as by car...". Remote location, narrow busy B1013 makes the site unsuitable for access by cycle or on foot.

It also contravenes PPS1 (27vii)... "reduce need to travel, encourage accessible public transport provision to secure more sustainable patterns of transport...Planning should actively manage patterns of urban growth to make fullest use of public transport and focus development in existing centres, near to major public transport interchanges". Core Strategy undermines its own policy Transport and Highways policy T1 and is unsound.

Although shown on accompanying drawing in earlier versions, there was no prior textual mention of Foundry industrial estate (next to Eldon Way) for redevelopment until current CS 2009 Submission. This was stated to be a typing error, but does not inspire confidence in reliability of drafting.

Revise both 2009 Core Strategy and 2009 HAAP Issues/options

Chapter 12: Retail/Town centres

The Core Strategy misrepresents findings of the Retail and Leisure Study 2008.

Para.12.38 The Core Strategy states (para.12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace."

Whereas the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure".

2) (10.28) "There is no immediate capacity for additional floorspace".

3) (10.29) "we recommend focus be maintained on developing Hockley's existing strengths, rather than retail expansion"

4) 10.31 "the current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it has a very small catchment population. Accordingly, the council may wish to consider reclassifying Hockley from a town centre to a district centre".

Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

The Council will work with landowners and its partners to deliver the HAAP.

Remove threat of compulsory purchase orders.

16717 Object

CHAPTER 9 Appendix CLT1

One doesn't perceive impartiality when the Planning Director replies to local HAAP survey with "The affluent people of Hockley are entitled to famous name shops".

Chapter 5: Character of Place and Local Lists

Para.5.4 "Rochford district has unique character..stems from traditional buildings..still dominate towns and villages".

Para.5.17 "Council believes many buildings..are of local distinctiveness..part of..cherished local scene".

This only applies to favoured places: Rochford, Rayleigh, greenbelt villages. Many Hockley conservable items have been systemically removed for supposedly lucrative development in face of widespread protect. This is for supposed need for housing. In fact heritage items have been replaced by dwellings most cannot afford, and/or are hard to sell due to unsuitability of massing and siting. Many other homes are jeopardised by this practice.

HAAP issues 2009. Core Strategy 2006, 2007,2008, SCI.2006

Fewer 'vested interests', more even handedness. No more pressing people out of businesses, homes for expediency.

A CPRE Fieldwork issue extolled Local Lists, citing refusal of 16 flats to replace character house, not on local list. Inspector said house, facade made a contribution to area character, even if English heritage decided it didn't warrant listing. Council worked to get the house grade listed and even made adjacent area conservation one.

Hockley had one such on a "significant site" faced with 13 flats. Ward Member omitted house from refusal proposal, so house could be demolished. RDC dropped Local List ahead of appeal: "Government frowned on such Lists" (Other LAs, unaware of supposed directive retained theirs. After demolition RDC restored Local Lists, saying Government now support them. When Inspector queried the complaint, the then policy officer said "just politics, lot of local interest, nothing of character in the area[!]. (A dozen such items had been removed). Some "distinctive" Hockley buildings are still condemned (in Greensward Lane.; others threatened (Spa Road). Whereas a modest hue and cry in Rayleigh will usually result in a building being saved.

Conclusion

Core Strategy Submission DPD is basically unsound in many respects

Incomplete information. Amongst others, it refers to Hockley AAP, the first stage of which is complete, but not other three. Rochford AAP first stage has been published in arrears of Core Strategy Submission. Rayleigh AAP is still awaited. Precise housing sites are absent, as Urban Capacity Study 2007 has been superseded by Strategic Housing Land Availability Assessment, not yet published. Traders, residents, are thus responding to Core Strategy Submission with incomplete information.

Lack of community involvement. Chapter 1, Introduction, para. 1.11 "Community involvement is an essential part of the plan making process".

In Statement of Community Involvement 2006 Rochford RDC "recognises need to enable people to have their voices heard".

Re Public Meetings: "Consideration will be had to timing and venue to ensure meeting is as accessible as possible".

Take Hockley Area Action Plan as an example of the opposite of all this:- Presentation of document was at Hullbridge, 7.30pm. It was also discussed with JAAP at Rochford Freight House (for traders only) at 7am, without publicity. Excuse made: HAAP on RDC website, which none will seek unless knowing it is there. Rochford District Matters newsheet had minute articles on p.3, half way through consultation period. Another excuse: a 2nd presentation by Hockley Residents Association with planning officer present: only because of complaints, and it is not the HRA's responsibility to RDC's job. Due to unavoidable haste of calling meeting, few knew and only 50 were present.

In Core Strategy Submission Hockley Parish Plan has been ignored. Proposals also ignore 95% rejection rate response to HAAP 2009, which included proposals for Eldon Way employment site.

Unfettered right of developers to carry on as if Core Strategy didn't exist. In PPS 12, Ch.4.6 states: "Core Strategies should be flexible and able to show how they handle contingencies". Several large planning applications have been submitted proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS 12.

Where are we? Finally, at Chapter 1, Introduction, para. 1.24: "the Core Strategy will have to be reviewed in the event of a new Local Area Agreement, post-2011, setting different priorities". So what purpose does all this work serve? So we have hardly finished this exercise, before it all starts again?

Summary:

Policy T3, CLT1 Appendix CLT1 Public transport RDC admits this is in the private sector. In Hockley, operator has cut No7 service to 1 per hour from Ashingdon Schools, claiming it is unviable beyond. This is unlikely to change as Hockley

Core Strategy Submission Document

16717 Object

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is car dependant. No8 bus through Hawkwell is cut to 1 per hour to Rayleigh, for same reason as No7. Proposed planning agreements with developers can't run: eg, a community centre or classroom given by a developer remains once he has moved on - how can that apply for an on-going bus service?

Change to Plan

Appear at exam?	Not Specified	Soundness Tests	i
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Core Strategy Submission Document

O - 16748 - 14229 - Appendix CLT1 - i, iii

16748 Object

CHAPTER 9 Appendix CLT1

Respondent: Hockley Under Threat (J Abbey) [14229]

Hockley Under Threat
None provided

Agent: N/A

Full Text:

Ch. 4 Housing; Ch.10 Transport, Highways; Ch.11 Economic Development; Ch.12 Retail/town centres; Ch.5 Character of place & Local Lists

Chapter 4: Housing

Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1, Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2

N.E.Hockley was discarded as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley...along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

Need to be logical and even-handed in proposals

June 2009 issue C S Submission issue says Eldon Way will be used for housing, whereas Sept.2009 issue says "alternative uses, including residential.." to be decided by HAAP (Issues consultation done, Pref.Options issue awaited, but judging from JAAP Pref.Options decision - namely biggest option chosen against overriding opposition, it will be housing).

Policy H1, T1 Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG14 & PPS1. it also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths",

The Core Strategy also contravenes its own policy T1 and is unsound.

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

Establish like motorways with wholesale demolition.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts.

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Para.10.5

Policy T3, CLT1 Appendix CLT1

T1 & T2 "...highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which

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O - 16748 - 14229 - Appendix CLT1 - i, iii

16748 Object

CHAPTER 9 Appendix CLT1

cannot be altered without much destruction.

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Para.1.25 Para.11.32

Policy ED4 T1 & T2 Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to accommodated employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

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Revise both 2009 Core Strategy and 2009 HAAP Issues/options

Move to new industrial site near airport contravenes PPS4:

EC7.3C "out of centre sites, with preference given to sites..well served by choice of..transport and..close to centre and..high likelihood of forming links with centre". There is no current public transport and links with centres is unlikely".

EC 7.5.1 "whether the site is or will be accessible and well served by choice of transport, public transport, walking and cycling, as well as by car..". Remote location, narrow busy B1013 makes the site unsuitable for access by cycle or on foot.

It also contravenes PPS1 (27vii).. "reduce need to travel, encourage accessible public transport provision to secure more sustainable patterns of transport..Planning should actively manage patterns of urban growth to make fullest use of public transport and focus development in existing centres, near to major public transport interchanges". Core Strategy undermines its own policy Transport and Highways policy T1 and is unsound.

H1 & RTC6 Although shown on accompanying drawing in earlier versions, there was no prior textual mention of Foundry industrial estate (next to Eldon Way) for redevelopment until current CS 2009 Submission. In recent amendment to the CS this was stated to be due to a typing error!

Chapter 12: Retail/Town centres

The Core Strategy misrepresents findings of the Retail and Leisure Study 2008.

Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

Para.12.38 H1 & RTC6 The Core Strategy states (para.12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace."

Whereas the R&LS actually states:

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Core Strategy Submission Document

16748 Object

CHAPTER 9 Appendix CLT1

shopping expenditure".

2) (10.28) "There is no immediate capacity for additional floorspace".

3) (10.29) "we recommend focus be maintained on developing Hockley's existing strengths, rather than retail expansion"

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Remove threat of compulsory purchase orders.

The Council will work with landowners and its partners to deliver the HAAP.

Chapter 5: Character of Place and Local Lists

Para.5.4 "Rochford district has unique character..stems from traditional buildings..still dominate towns and villages".

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Conclusion

Core Strategy Submission DPD is basically unsound in many respects:

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In Core Strategy Submission Hockley Parish Plan has been ignored. Proposals also ignore 95% rejection rate response to HAAP 2009, which included proposals for Eldon Way employment site.

Unfettered right of developers to carry on as if Core Strategy didn't exist. In PPS 12, Ch.4.6 states: "Core Strategies should be flexible and able to show how they handle contingencies". Several large planning applications have been submitted proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS 12.

Where are we? Finally, at Chapter 1, Introduction, para. 1.24: "the Core Strategy will have to be reviewed in the event of a new Local Area Agreement, post-2011, setting different priorities". So what purpose does all this work serve? So we have hardly finished this exercise, before it all starts again?

Summary:

Policy T3 CLT1 Appendix CLT1 T1 & T2

Public transport RDC admits this is in the private sector. In Hockley, operator has cut No 7 service to one per hour from Ashingdon Schools, claiming it is unviable beyond. This is unlikely to change as Hockley is car dependant. No 8 bus through Hawkwell is cut to one per hour to Rayleigh, for same reason as No 7. Proposed planning agreements with developers can't run: e.g., a community centre or classroom given by a developer remains once he has moved on - how can that apply for an on-going bus service?

Change to Plan

Appear at exam? Not Specified

Soundness Tests i, iii

Core Strategy Submission Document

O - 16436 - 14218 - Transport - iii

16436 Object

CHAPTER 10 Transport

Respondent: Barbara Havey [14218]

71 Main Road
Hockley
Essex
SS5 4RG

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.
â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound
RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is

16436 Object

CHAPTER 10 Transport

also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

Summary:

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

Previous consultations ignored by RDC:

â€¢ The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

â€¢ The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

Previous consultations ignored by RDC:

The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

â€¢ The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

â€¢ the Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!

â€¢ The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Summary:

16436 Object

CHAPTER 10 Transport

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates
â€¢ The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely
â€¢ the Foundry Industrial Estate has never even been previously mentioned;
â€¢ The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.
 - 2) (10.28) "There is no immediate capacity for additional floor space."
 - 3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion"
 - 4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".
- The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Summary:

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and

Core Strategy Submission Document

O - 16436 - 14218 - Transport - iii

16436 Object

CHAPTER 10 Transport

providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

Change to Plan

Appear at exam?	Not Specified	Soundness Tests	iii
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Core Strategy Submission Document

O - 16483 - 9646 - Transport - i

16483 Object

CHAPTER 10 Transport

Respondent: Mrs Margaret Christian [9646]

41 Westminster Drive
Hockley
Essex
SS5 4XD
01702 204320

Agent: N/A

Full Text: Please find enclosed my objection to the Core Strategy Submission DPD. Please kindly acknowledge receipt of this objection and duly register it.

Objections to RDC's Core Strategy Submission DPD

Reason Unsound

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus service are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

3. RCD are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

16483 Object

CHAPTER 10 Transport

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs not, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. Thus it is unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of address the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:

The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

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The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

The Foundry Industrial Estates has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy acknowledges this omission was due to a typing error!

The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing HAAP consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy or Hockley Area Action Plan (HAAP) defines its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

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9. PPS12, 4.6, states that Cores Strategies show be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which do not indicate how such applications will be handled and does not comply with

Core Strategy Submission Document

O - 16483 - 9646 - Transport - i

16483 Object

CHAPTER 10 Transport

PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

10. The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

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The Core Strategy is inaccurate, misleading and unsound.

Summary:

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16489 - 9646 - Transport - i

16489 Object

CHAPTER 10 Transport

Respondent: Mrs Margaret Christian [9646]

41 Westminster Drive
Hockley
Essex
SS5 4XD
01702 204320

Agent: N/A

Full Text: Please find enclosed my objection to the Core Strategy Submission DPD. Please kindly acknowledge receipt of this objection and duly register it.

Objections to RDC's Core Strategy Submission DPD

Reason Unsound

1. Highway & Traffic Implications

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The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

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16489 Object

CHAPTER 10 Transport

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

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8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing HAAP consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

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Core Strategy Submission Document

16489 Object

CHAPTER 10 Transport

PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

10. The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

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The Core Strategy is inaccurate, misleading and unsound.

Summary:

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16523 - 13921 - Transport - i

16523 Object

CHAPTER 10 Transport

Respondent: Ms H Rozga [13921]

56A Aldermans Hill
Hockley
Essex
SS5 4RW

Agent: N/A

Full Text:

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus service are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

3. RCD are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

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The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

16523 Object

CHAPTER 10 Transport

Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts.

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. Thus it is unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of address the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

Summary:

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:

The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

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The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

7. RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates.

The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely.

The Foundry Industrial Estates has never even been previously mentioned in any plan version; A recent amendment to

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the Core Strategy acknowledges this omission was due to a typing error!

The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

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Summary:

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The Foundry Industrial Estate has never even been previously mentioned.

The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate.

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing HAAP consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy or Hockley Area Action Plan (HAAP) defines its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

9. PPS12, 4.6, states that Cores Strategies show be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which do not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

10. The Core Strategy misrepresent the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.

2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion".

4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6.

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Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) "the Council may wish to consider reclassifying Hockley from a town centre to a district centre.

Summary:

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus service are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

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Respondent: G and S Cooke [13667]

56 Aldermans Hill
Hockley
Essex
SS5 4RW

Agent: N/A

Full Text:

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

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Summary:

Proposals for moving employment to of town locations, at either end of the district, with no existing public transport inks, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

3. RCD are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in

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the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

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Summary

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Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.

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2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion".

4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Core Strategy is inaccurate, misleading and unsound.

Summary:

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Summary: Proposals for moving employment to of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

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O - 16574 - 14231 - Transport - i

16574 Object

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Respondent: Heather Wakefield [14231]

Not provided

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

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The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.
â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

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Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

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The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

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Summary:

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No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

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SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

Previous consultations ignored by RDC:

â€¢ The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

â€¢ The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

Previous consultations ignored by RDC:

The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

â€¢ The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

â€¢ the Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!

â€¢ The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Summary:

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â€¢ the Foundry Industrial Estate has never even been previously mentioned;
â€¢ The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.
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- The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

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Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

Change to Plan

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

Core Strategy Submission Document

O - 16574 - 14231 - Transport - i

16574 Object

CHAPTER 10 Transport

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16592 - 14232 - Transport - i

16592 Object

CHAPTER 10 Transport

Respondent: Roger Wakefield [14232]

Not provided

SS5 4UX

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighboring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

16592 Object

CHAPTER 10 Transport

Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modeling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

Summary:

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

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SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

Previous consultations ignored by RDC:

• The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

• The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

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RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

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Core Strategy Submission Document

O - 16592 - 14232 - Transport - i

16592 Object

CHAPTER 10 Transport

â€¢ the Foundry Industrial Estate has never even been previously mentioned;
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Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

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- The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

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Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

Change to Plan

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

Core Strategy Submission Document

O - 16592 - 14232 - Transport - i

16592 Object

CHAPTER 10 Transport

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

S - 15940 - 9032 - Vision - None

15940 Support

CHAPTER 10 Vision

Respondent: Essex Chambers of Commerce (Mr John Dallaway) **Agent:** N/A
[9032]

Essex Chambers of Commerce
2nd Floor,
Viscount House,
London Southend Airport, Southend-on-Sea.
Essex.
SS2 6YF
01702-560100

Full Text: Essex Chambers of Commerce strongly supports the vision for transport and the development of a Transport Strategy SPD which must be subject to meaningful consultation with stakeholders. It is vitally important for the efficient movement of goods and services that significant improvements to the existing highway infrastructure will be required during the plan period. The existing levels of congestion are considered to be unacceptable, so further provision is essential to cope with the traffic generation to be created by more housing and employment. Consideration must also be given to a better east-west route linking east Rochford to the A130/A127.

Summary: Essex Chambers of Commerce strongly supports the vision for transport and the development of a Transport Strategy SPD which must be subject to meaningful consultation with stakeholders. It is vitally important for the efficient movement of goods and services that significant improvements to the existing highway infrastructure will be required during the plan period. The existing levels of congestion are considered to be unacceptable, so further provision is essential to cope with the traffic generation to be created by more housing and employment. Consideration must also be given to a better east-west route linking east Rochford to the A130/A127.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16192 - 8119 - Vision - None

16192 Support

CHAPTER 10 Vision

Respondent: Baltic Distribution Limited (Mr Robert Croshaw) **Agent:** N/A
[8119]

Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
Essex
SS4 2HA
England
01702 258551

Full Text: BY 2017 - POINT 3

The Wharf welcomes your support in securing this, however, would it be possible to achieve this vision within 5 years?

Summary: BY 2017 - POINT 3

The Wharf welcomes your support in securing this, however, would it be possible to achieve this vision within 5 years?

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 15833 - 4951 - Introduction - i, ii, iii

15833 Object

CHAPTER 10 Introduction

Respondent: Hockley Residents Association (Mr B Guyett) [4951] **Agent:** N/A

Hockley Residents Association
2 Tonbridge Road
Hockley
Essex
SS5 5HL

Full Text: Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
i. (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.
i. EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary: Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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Change to Plan Revise economic policy policy to comply with guidelines

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

16280 Object

CHAPTER 10 Introduction

Respondent: Mr David Dare [12098]

1, Woodstock Crescent
Hockley Essex
SS5 4XG
UK
01702 205813

Agent: N/A

Full Text: Highway & Traffic Implications

1. Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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The site selected for the new industrial estate also contravenes PPS4 which states;

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2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

3. RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

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16280 Object

CHAPTER 10 Introduction

Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

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It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

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RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

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5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:

* The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

* The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

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16280 Object

CHAPTER 10 Introduction

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7. RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

* The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

* the Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!

* The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

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8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

9. PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

10. THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food

Core Strategy Submission Document

16280 Object

CHAPTER 10 Introduction

shopping expenditure.

2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's

existing strengths, rather than retail expansion"

4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moveover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace".

Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

16298 Object

CHAPTER 10 Introduction

Respondent: Mr D Himsley [14206]

4 Brackendale Close
Hockley
Essex
SS5 5AP

Agent: N/A

Full Text: Please find the following objections: -

10 off Unsound Reasons.
1. Highway and Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

3. RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:
The Hockley Parish Plan (dated 2007). The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

7. RDC not consulted on proposals to relocate the Eldon Way and Foundry Industrial Estates

EW; CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" absolutely no consultation on concept of moving EW businesses entirely

FIE; has never even been previously mentioned in any plan version; CS states omission was due to typing error!

Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus proposals are not founded on a robust and credible evidence base and are unsound.

8. The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

Core Strategy Submission Document

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CHAPTER 10 Introduction

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound

9. PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies"

Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which

does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise

residents how such changes will be made and the strategy is unsound.

10. The CS misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The CS states "The R&LS states Hockley has great potential and has a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) "does not lend itself to a food store capable of retaining a significant proportion of main food shopping expenditure.
- 2) "there is no immediate capacity for additional floor space."
- 3) "recommend that focus be maintained on developing Hockley's existing strengths."
- 4) " the Council may wish to consider reclassifying Hockley from a town center, to a district center".

Summary:

1. Highway and Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16714 - 7834 - Introduction, 10.5 - i

16714 Object

CHAPTER 10 Introduction, 10.5

Respondent: Ms G Yeadell [7834]

6 Southend Road
Hockley
Essex
SS5 4QQ
01702 205450

Agent: N/A

Full Text: Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1

Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2 you discarded N.E.Hockley as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley..along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

Response to C.S Preferred Options 2008 and HAAP 2009

June 2009 issue C S Submission issue says Eldon Way will be used for housing, whereas Sept.2009 issue says "alternative uses, including residential.." to be decided by HAAP (Issues consultation done, Pref.Options issue awaited, but judging from JAAP Pref.Options decision - namely biggest option chosen against overriding opposition, it will be housing).

Need to be logical and even-handed in proposals

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

Establish likely level of Standard Charges. Accept you cannot turn district into motorways with wholesale demolition.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

Para.10.5 "..highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which cannot be altered without much destruction.

Reply to CS Pref. Options 2008 & HAAP Issues/Options 2009

Policy T3, CLT1 Appendix CLT1 Public transport RDC admits this is in the private sector. In Hockley, operator has cut No7 service to 1 per hour from Ashingdon Schools, claiming it is unviable beyond. This is unlikely to change as Hockley is car dependant. No8 bus through Hawkwell is cut to 1 per hour to Rayleigh, for same reason as No7. Proposed planning agreements with developers can't run: eg, a community centre or classroom given by a developer remains once he has moved on - how can that apply for an on-going bus service?

Reply to Infrastructure Transport in CS Pref. Opts. 2008 and to HAAP Issues Opts. 2009.

Ch.11 Economic development

Policy ED3 Core Strategy preferred Options 2008 hinted at possible housing in Eldon Way site. June 2009 Submission version, without consultation, said Eldon Way would be housing (map included Foundry, not the text). September 2009 Submission said redevelopment would be in HAAP (which apart from the Issues/Options version, is unfinished. Judging from results of JAAP Preferred Options where biggest option is chosen, though most respondents were against it, site will be housing, without consultation.

Core Strategy Submission Document

O - 16714 - 7834 - Introduction, 10.5 - i

16714 Object

CHAPTER 10 Introduction, 10.5

Para.1.25, Para.11.32 Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to accommodated employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

Reply to HAAP Issues Options 2009

Remove compulsory relocation

Policy ED4 Policy states Council will allocate 18ha of land to make up for de-allocations in ED3 - that proves point above.

Proposals for moving employment to out of town locations with no existing transport links are contrary to government policies PPG4, PPS1 and PPS4 and Core Strategy Policy T1.

Evidence Base is ignored by contravening Hockley Parish Plan 2007 and ignoring residents' views on HAAP Issues/Options. Next stage of HAAP Preferred Options is pre-empted and rendered irrelevant. Core Strategy plans to relocate Eldon Way Foundry estate to Greenfield site with no nearby bus or railway. RDC plans to upgrade the nearest road to dual carriageway, though the connecting B1013 (through Hockley) will stay single, said by ECC Highways statistics to be 72% capacity. Airport bosses and council cannot suggest there will be no traffic growth from JAAP and new industrial site.

Reply to Hockley Parish Plan 2007. HAAP Issues 2009

Move to new industrial site near airport contravenes PPS4:

- EC7.3C "out of centre sites, with preference given to sites...well served by choice of...transport and...close to centre and...high likelihood of forming links with centre". There is no current public transport and links with centres is unlikely".

- EC 7.5.1 "whether the site is or will be accessible and well served by choice of transport, public transport, walking and cycling, as well as by car...". Remote location, narrow busy B1013 makes the site unsuitable for access by cycle or on foot.

It also contravenes PPS1 (27vii)... "reduce need to travel, encourage accessible public transport provision to secure more sustainable patterns of transport...Planning should actively manage patterns of urban growth to make fullest use of public transport and focus development in existing centres, near to major public transport interchanges". Core Strategy undermines its own policy Transport and Highways policy T1 and is unsound.

Although shown on accompanying drawing in earlier versions, there was no prior textual mention of Foundry industrial estate (next to Eldon Way) for redevelopment until current CS 2009 Submission. This was stated to be a typing error, but does not inspire confidence in reliability of drafting.

Revise both 2009 Core Strategy and 2009 HAAP Issues/options

Chapter 12: Retail/Town centres

The Core Strategy misrepresents findings of the Retail and Leisure Study 2008.

Para.12.38 The Core Strategy states (para.12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace."

Whereas the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure".

2) (10.28) "There is no immediate capacity for additional floorspace".

3) (10.29) "we recommend focus be maintained on developing Hockley's existing strengths, rather than retail expansion"

4) 10.31 "the current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it has a very small catchment population. Accordingly, the council may wish to consider reclassifying Hockley from a town centre to a district centre".

Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

The Council will work with landowners and its partners to deliver the HAAP.

Remove threat of compulsory purchase orders.

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16714 Object

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One doesn't perceive impartiality when the Planning Director replies to local HAAP survey with "The affluent people of Hockley are entitled to famous name shops".

Chapter 5: Character of Place and Local Lists

Para.5.4 "Rochford district has unique character..stems from traditional buildings..still dominate towns and villages".

Para.5.17 "Council believes many buildings..are of local distinctiveness..part of..cherished local scene".

This only applies to favoured places: Rochford, Rayleigh, greenbelt villages. Many Hockley conservable items have been systemically removed for supposedly lucrative development in face of widespread protect. This is for supposed need for housing. In fact heritage items have been replaced by dwellings most cannot afford, and/or are hard to sell due to unsuitability of massing and siting. Many other homes are jeopardised by this practice.

HAAP issues 2009. Core Strategy 2006, 2007,2008, SCI.2006

Fewer 'vested interests', more even handedness. No more pressing people out of businesses, homes for expediency.

A CPRE Fieldwork issue extolled Local Lists, citing refusal of 16 flats to replace character house, not on local list. Inspector said house, façade made a contribution to area character, even if English heritage decided it didn't warrant listing. Council worked to get the house grade listed and even made adjacent area conservation one.

Hockley had one such on a "significant site" faced with 13 flats. Ward Member omitted house from refusal proposal, so house could be demolished. RDC dropped Local List ahead of appeal: "Government frowned on such Lists" (Other LAs, unaware of supposed directive retained theirs. After demolition RDC restored Local Lists, saying Government now support them. When Inspector queried the complaint, the then policy officer said "just politics, lot of local interest, nothing of character in the area[!]. (A dozen such items had been removed). Some "distinctive" Hockley buildings are still condemned (in Greensward Lane.; others threatened (Spa Road). Whereas a modest hue and cry in Rayleigh will usually result in a building being saved.

Conclusion

Core Strategy Submission DPD is basically unsound in many respects

Incomplete information. Amongst others, it refers to Hockley AAP, the first stage of which is complete, but not other three. Rochford AAP first stage has been published in arrears of Core Strategy Submission. Rayleigh AAP is still awaited. Precise housing sites are absent, as Urban Capacity Study 2007 has been superseded by Strategic Housing Land Availability Assessment, not yet published. Traders, residents, are thus responding to Core Strategy Submission with incomplete information.

Lack of community involvement. Chapter 1, Introduction, para. 1.11 "Community involvement is an essential part of the plan making process".

In Statement of Community Involvement 2006 Rochford RDC "recognises need to enable people to have their voices heard".

Re Public Meetings: "Consideration will be had to timing and venue to ensure meeting is as accessible as possible".

Take Hockley Area Action Plan as an example of the opposite of all this:- Presentation of document was at Hullbridge, 7.30pm. It was also discussed with JAAP at Rochford Freight House (for traders only) at 7am, without publicity. Excuse made: HAAP on RDC website, which none will seek unless knowing it is there. Rochford District Matters newsheet had minute articles on p.3, half way through consultation period. Another excuse: a 2nd presentation by Hockley Residents Association with planning officer present: only because of complaints, and it is not the HRA's responsibility to RDC's job. Due to unavoidable haste of calling meeting, few knew and only 50 were present.

In Core Strategy Submission Hockley Parish Plan has been ignored. Proposals also ignore 95% rejection rate response to HAAP 2009, which included proposals for Eldon Way employment site.

Unfettered right of developers to carry on as if Core Strategy didn't exist. In PPS 12, Ch.4.6 states: "Core Strategies should be flexible and able to show how they handle contingencies". Several large planning applications have been submitted proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS 12.

Where are we? Finally, at Chapter 1, Introduction, para. 1.24: "the Core Strategy will have to be reviewed in the event of a new Local Area Agreement, post-2011, setting different priorities". So what purpose does all this work serve? So we have hardly finished this exercise, before it all starts again?

Summary:

Para.10.5 "..highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road

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16714 Object

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Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which cannot be altered without much destruction.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16746 - 14229 - Introduction, 10.5 - i

16746 Object

CHAPTER 10 Introduction, 10.5

Respondent: Hockley Under Threat (J Abbey) [14229]

Hockley Under Threat
None provided

Agent: N/A

Full Text: Ch. 4 Housing; Ch.10 Transport, Highways; Ch.11 Economic Development; Ch.12 Retail/town centres; Ch.5 Character of place & Local Lists

Chapter 4: Housing

Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1, Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2

N.E.Hockley was discarded as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley...along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

Need to be logical and even-handed in proposals

June 2009 issue C S Submission issue says Eldon Way will be used for housing, whereas Sept.2009 issue says "alternative uses, including residential.." to be decided by HAAP (Issues consultation done, Pref.Options issue awaited, but judging from JAAP Pref.Options decision - namely biggest option chosen against overriding opposition, it will be housing).

Policy H1, T1 Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG14 & PPS1. it also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths",

The Core Strategy also contravenes its own policy T1 and is unsound.

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

Establish like motorways with wholesale demolition.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts.

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Para.10.5

Policy T3, CLT1 Appendix CLT1

T1 & T2 "...highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which

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cannot be altered without much destruction.

Public transport RDC admits this is in the private sector. In Hockley, operator has cut No 7 service to one per hour from Ashingdon Schools, claiming it is unviable beyond. This is unlikely to change as Hockley is car dependant. No 8 bus through Hawkwell is cut to one per hour to Rayleigh, for same reason as No 7. Proposed planning agreements with developers can't run: e.g., a community centre or classroom given by a developer remains once he has moved on - how can that apply for an on-going bus service?

Ch.11 Economic development

Policy ED3 Core Strategy preferred Options 2008 hinted at possible housing in Eldon Way site. June 2009 Submission version, without consultation, said Eldon Way would be housing (map included Foundry, not the text). September 2009 Submission said redevelopment would be in HAAP (which apart from the Issues/Options version, is unfinished. Judging from results of JAAP Preferred Options where biggest option is chosen, though most respondents were against it, site will be housing, without consultation.

Para.1.25 Para.11.32

Policy ED4 T1 & T2 Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to accommodated employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

Remove compulsory relocation

Policy states Council will allocate 18ha of land to make up for de-allocations in ED3 - that proves point above.

Proposals for moving employment to out of town locations with no existing transport links are contrary to government policies PPG4, PPS1 and PPS4 and Core Strategy Policy T1.

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Revise both 2009 Core Strategy and 2009 HAAP Issues/options

Move to new industrial site near airport contravenes PPS4:

EC7.3C "out of centre sites, with preference given to sites..well served by choice of..transport and..close to centre and..high likelihood of forming links with centre". There is no current public transport and links with centres is unlikely".

EC 7.5.1 "whether the site is or will be accessible and well served by choice of transport, public transport, walking and cycling, as well as by car..". Remote location, narrow busy B1013 makes the site unsuitable for access by cycle or on foot.

It also contravenes PPS1 (27vii).. "reduce need to travel, encourage accessible public transport provision to secure more sustainable patterns of transport..Planning should actively manage patterns of urban growth to make fullest use of public transport and focus development in existing centres, near to major public transport interchanges". Core Strategy undermines its own policy Transport and Highways policy T1 and is unsound.

H1 & RTC6 Although shown on accompanying drawing in earlier versions, there was no prior textual mention of Foundry industrial estate (next to Eldon Way) for redevelopment until current CS 2009 Submission. In recent amendment to the CS this was stated to be due to a typing error!

Chapter 12: Retail/Town centres

The Core Strategy misrepresents findings of the Retail and Leisure Study 2008.

Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

Para.12.38 H1 & RTC6 The Core Strategy states (para.12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace."

Whereas the R&LS actually states:

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Remove threat of compulsory purchase orders.

The Council will work with landowners and its partners to deliver the HAAP.

Chapter 5: Character of Place and Local Lists

Para.5.4 "Rochford district has unique character..stems from traditional buildings..still dominate towns and villages".

Para.5.17 "Council believes many buildings..are of local distinctiveness..part of..cherished local scene".

This only appears to apply to certain places: Rochford, Rayleigh, greenbelt villages. Many Hockley conservable items have been systemically removed for supposedly lucrative development in face of widespread protect. This is for supposed need for housing. In fact heritage items have been replaced by dwellings most cannot afford, and/or are hard to sell due to unsuitability of massing and siting. Many other homes are jeopardised by this practice.

Conclusion

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Hockley Area Action Plan as an example of the opposite of all this:- Presentation of document was at Hullbridge, 7.30 p.m. It was also discussed with JAAP at Rochford Freight House (for traders only) at 7 a.m., without publicity. Excuse made: HAAP on RDC website, which none will seek unless knowing it is there. Rochford District Matters newssheet had minute articles on p.3, half way through consultation period. Another excuse: a second presentation by Hockley Residents Association with planning officer present: only because of complaints, and it is not the HRA's responsibility to RDC's job. Due to unavoidable haste of calling meeting, few knew and only 50 were present.

In Core Strategy Submission Hockley Parish Plan has been ignored. Proposals also ignore 95% rejection rate response to HAAP 2009, which included proposals for Eldon Way employment site.

Unfettered right of developers to carry on as if Core Strategy didn't exist. In PPS 12, Ch.4.6 states: "Core Strategies should be flexible and able to show how they handle contingencies". Several large planning applications have been submitted proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS 12.

Where are we? Finally, at Chapter 1, Introduction, para. 1.24: "the Core Strategy will have to be reviewed in the event of a new Local Area Agreement, post-2011, setting different priorities". So what purpose does all this work serve? So we have hardly finished this exercise, before it all starts again?

Summary:

Para 10.5 "..highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which cannot be altered without much destruction.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

S - 15995 - 13441 - Introduction, 10.7 - None

15995 Support

CHAPTER 10 Introduction, 10.7

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: The aspiration to reduce car dependency is welcome

Summary: The aspiration to reduce car dependency is welcome

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 15934 - 7995 - Highways, 10.9 - i, ii, iii

15934 Object

CHAPTER 10 Highways, 10.9

Respondent: Mr Alan Stone [7995]

180 Rawreth Lane
Rayleigh
Essex
SS6 9RN
United Kingdom
01268 784031

Agent: N/A

Full Text:

Policy T1 - Highways states "Developments will be required to be located and designed in such a way as to reduce reliance on the private car. However, some impact on the highway network is inevitable and the Council will work with developers and the Highway Authority to ensure that appropriate improvements are carried out. The Council will work with the Highways Authority to deliver online improvements to the east to west road network".

Policy T1 - Highways (extracts) Policy states:

1, "Developments will be required to be located and designed in such a way as to reduce reliance on the private car, However, some impact on the highway network is inevitable and the Council will work with developers and the Highway Authority to ensure that appropriate improvements are carried out".

This is an UNSOUND Statement. Development of Rawreth will not reduce the reliance on the private car because it is too remote from principal towns and schools. Public transport is poor and infrequent. Bus companies keep saying it is not commercially viable.

2, "The Council will work with the Highways Authority to deliver online improvements to the east to west road network". Rawreth Lane forms part of the East to West road network but has no mention in T2 - Highway Improvements. This road already suffers severe congestion at commuter and school run periods. Regular grid lock happens now and will only get worse if a massive development, linked to Rawreth Lane, is approved.

This is also UNSOUND as Rawreth Lane is not identified as part of the East to West road network

Summary:

Development in Rawreth will not reduce the reliance on cars, because it is too remote from principal towns and schools. Not mentioned in T2, Rawreth Lane forms part of the East to West network. Presumably this means no delivery of online improvements. *** I disagree with these summaries, please read the full submission.

Change to Plan

Include Rawreth Lane when considering any improvements to the East to West road network. Do not ignore the fact that such development will cause additional pressure on an already inadequate road.

Appear at exam? No

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 16100 - 7995 - Highways, 10.9 - i, ii

16100 Object

CHAPTER 10 Highways, 10.9

Respondent: Mr Alan Stone [7995]

180 Rawreth Lane
Rayleigh
Essex
SS6 9RN
United Kingdom
01268 784031

Agent: N/A

Full Text: Quote from above: "In addition, the Council believe that existing connections between the west, where the population is focused, and the more rural east which nevertheless contains a number of local employment uses, is inadequate. The Council will work with Essex County Council to seek necessary improvements to east-west highways in order to help sustain employment uses in the east of the District".
Yet more evidence that the extra dwellings in the west will affect existing connections with the east. Again I state that far less dwellings should be proposed for Rawreth.

Summary: Quote from above: "In addition, the Council believe that existing connections between the west, where the population is focused, and the more rural east which nevertheless contains a number of local employment uses, is inadequate. The Council will work with Essex County Council to seek necessary improvements to east-west highways in order to help sustain employment uses in the east of the District".
Yet more evidence that the extra dwellings in the west will affect existing connections with the east. Again I state that far less dwellings should be proposed for Rawreth.

Change to Plan Reduce the number of proposed dwellings in the west so as to reduce commuting on the "inadequate existing connections"

Appear at exam? No

Soundness Tests i, ii

Core Strategy Submission Document

S - 16194 - 8119 - Highways, 10.12 - None

16194 Support

CHAPTER 10 Highways, 10.12

Respondent: Baltic Distribution Limited (Mr Robert Croshaw) **Agent:** N/A
[8119]

Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
Essex
SS4 2HA
England
01702 258551

Full Text: We support this policy and note that you make special reference to the Rayleigh Weir junction, where the present roundabout structure over the A127 is unable to cope with dispersing the large volume of traffic efficiently at peak periods which, particularly in the evening, result in considerable tailbacks from Rayleigh Weir, along the A127 towards Basildon, creating congestion on the roundabout under the A127 where the A130 feeds in.

Summary: We support this policy and note that you make special reference to the Rayleigh Weir junction, where the present roundabout structure over the A127 is unable to cope with dispersing the large volume of traffic efficiently at peak periods which, particularly in the evening, result in considerable tailbacks from Rayleigh Weir, along the A127 towards Basildon, creating congestion on the roundabout under the A127 where the A130 feeds in.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 15943 - 9032 - Highways, 10.13 - None

15943 Support

CHAPTER 10 Highways, 10.13

Respondent: Essex Chambers of Commerce (Mr John Dallaway) **Agent:** N/A
[9032]

Essex Chambers of Commerce
2nd Floor,
Viscount House,
London Southend Airport, Southend-on-Sea.
Essex.
SS2 6YF
01702-560100

Full Text: Essex Chambers of Commerce supports the development of a Transport Strategy in partnership with Essex County Council and would expect there to be meaningful consultation with all stakeholders as part of the development and implementation process.

Summary: Essex Chambers of Commerce supports the development of a Transport Strategy in partnership with Essex County Council and would expect there to be meaningful consultation with all stakeholders as part of the development and implementation process.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 15835 - 4951 - Policy T1 - Highways - i, ii, iii

15835 Object

CHAPTER 10 Policy T1 - Highways

Respondent: Hockley Residents Association (Mr B Guyett) [4951] **Agent:** N/A

Hockley Residents Association
2 Tonbridge Road
Hockley
Essex
SS5 5HL

Full Text: The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

Summary: The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

Change to Plan Review policy of scattering houses across the district

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 15837 - 4951 - Policy T1 - Highways - i, ii, iii

15837 Object

CHAPTER 10 Policy T1 - Highways

Respondent: Hockley Residents Association (Mr B Guyett) [4951] **Agent:** N/A

Hockley Residents Association
2 Tonbridge Road
Hockley
Essex
SS5 5HL

Full Text: RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Summary: RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Change to Plan Review policy of scattering houses and industry across the district

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 15898 - 11793 - Policy T1 - Highways - i, ii

15898 Object

CHAPTER 10 Policy T1 - Highways

Respondent: Mr Brian Guyett [11793]

2 Tonbridge Road,
Hockley
SS55HL
United Kingdom
07736211248

Agent: N/A

Full Text: Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary: Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

Change to Plan Revise approach

Appear at exam? No

Soundness Tests i, ii

Core Strategy Submission Document

O - 15900 - 11793 - Policy T1 - Highways - i, ii, iii

15900 Object

CHAPTER 10 Policy T1 - Highways

Respondent: Mr Brian Guyett [11793]

2 Tonbridge Road,
Hockley
SS55HL
United Kingdom
07736211248

Agent: N/A

Full Text: The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

Summary: The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

Change to Plan Revise approach

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 15902 - 11793 - Policy T1 - Highways - i, ii, iii

15902 Object

CHAPTER 10 Policy T1 - Highways

Respondent: Mr Brian Guyett [11793]

2 Tonbridge Road,
Hockley
SS55HL
United Kingdom
07736211248

Agent: N/A

Full Text: RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound

Summary: RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound

Change to Plan Revise approach

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

S - 15922 - 9936 - Policy T1 - Highways - i, iii

15922 Support

CHAPTER 10 Policy T1 - Highways

Respondent: Mr David Grew [9936]

PO Box 2091
Hockley
Essex
SS5 4WR
UK
07740201389

Agent: Mr David Grew [9936]

PO Box 2091
Hockley
Essex
SS5 4WR
UK
07740201389

Full Text: I fully support the wording of this policy but would like to comment that the housing policies in the Core Strategy are in direct conflict with it as they propose to locate dwellings where there are very poor public transport links. As a result, this will mean reliance on the private car.

Summary: I fully support the wording of this policy but would like to comment that the housing policies in the Core Strategy are in direct conflict with it as they propose to locate dwellings where there are very poor public transport links. As a result, this will mean reliance on the private car.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 15941 - 9032 - Policy T1 - Highways - None

15941 Support

CHAPTER 10 Policy T1 - Highways

Respondent: Essex Chambers of Commerce (Mr John Dallaway) **Agent:** N/A
[9032]

Essex Chambers of Commerce
2nd Floor,
Viscount House,
London Southend Airport, Southend-on-Sea.
Essex.
SS2 6YF
01702-560100

Full Text: Support Policy T1 but would expect consideration to be given to enhancing the highway network at a strategic level ie new east-west route linking east Rochford to A130/A127, as well as delivering online improvements to east-west network.

Summary: Support Policy T1 but would expect consideration to be given to enhancing the highway network at a strategic level ie new east-west route linking east Rochford to A130/A127, as well as delivering online improvements to east-west network.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 15996 - 13441 - Policy T1 - Highways - None

15996 Support

CHAPTER 10 Policy T1 - Highways

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: It is unclear what is meant by "online improvements"

Summary: It is unclear what is meant by "online improvements"

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16013 - 10324 - Policy T1 - Highways - i, ii

16013 Object

CHAPTER 10 Policy T1 - Highways

Respondent: Mrs Jennifer Abbey [10324]

3 Claybrick Avenue
Hockley
Essex
SS5 4PS
UK
07768 542634

Agent: N/A

Full Text: Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary: Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

Change to Plan Revise approach

Appear at exam? No **Soundness Tests** i, ii

Core Strategy Submission Document

O - 16014 - 10324 - Policy T1 - Highways - i, ii, iii

16014 Object

CHAPTER 10 Policy T1 - Highways

Respondent: Mrs Jennifer Abbey [10324]

3 Claybrick Avenue
Hockley
Essex
SS5 4PS
UK
07768 542634

Agent: N/A

Full Text: RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):
"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.
The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Summary: RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Change to Plan Revise approach

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

S - 16058 - 14107 - Policy T1 - Highways - None

16058 Support

CHAPTER 10 Policy T1 - Highways

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: Are the hopes outlined here realistic? It is a lost cause to try to cut down the use of the private car. Section 106 Agreements would appear unlikely to cover the cost of adequate improvements. If this is not carried out, we will have serious problems with the increase in development planned.

Summary: Are the hopes outlined here realistic? It is a lost cause to try to cut down the use of the private car. Section 106 Agreements would appear unlikely to cover the cost of adequate improvements. If this is not carried out, we will have serious problems with the increase in development planned.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16075 - 7995 - Policy T1 - Highways - i, ii, iii

16075 Object

CHAPTER 10 Policy T1 - Highways

Respondent: Mr Alan Stone [7995]

180 Rawreth Lane
Rayleigh
Essex
SS6 9RN
United Kingdom
01268 784031

Agent: N/A

Full Text:

I quote from this section. "A considerable impact on the highway network is inevitable". So if this is the case, are RDC failing to address the problem by merely stating "we will work with developers and the Highway Authority to ensure that the requisite improvements are carried out"?

Pro-active plans are essential and RDC are failing drastically in this, as they cannot envisage a solution. What is meant by their stated objective "To deliver online improvements on the east to west road networks in partnership with the Highways Authority, Essex County Council ?

To me this is an unsound and meaningless statement. Rochford District residents have continually raised the question of how the east to west road networks can be improved and we are always told that they cannot due to the nature and topography of the area.

End of page 1. See page 2

Summary:

RDC and ECC Highways should be instructed to provide details of a structured and achievable plan to overcome the fact that "A considerable impact on the highway network is inevitable". Highways infrastructure, and in particular the East-West road network, should be in place before any further building is allowed.

Change to Plan

RDC and ECC Highways should be instructed to provide details of a structured and achievable plan to overcome the fact that "A considerable impact on the highway network is inevitable". Highways infrastructure should be in place before any further building is allowed.

Appear at exam? No

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 16078 - 7995 - Policy T1 - Highways - i, ii

16078 Object

CHAPTER 10 Policy T1 - Highways

Respondent: Mr Alan Stone [7995]

180 Rawreth Lane
Rayleigh
Essex
SS6 9RN
United Kingdom
01268 784031

Agent: N/A

Full Text:

Page 2. Please link to page 1.

In the not to distant future the potentially massive development London Southend Airport will have a dramatic impact on the existing road networks. This will not only result in an increase of passenger and freight traffic on our overcrowded roads, there will also have to be capacity for the 7000 personnel entering new jobs that will be created.

Can anything be so unsound as this! To enter such a period of expansion in people, and ultimately road traffic, without a structured and achievable plan is absolutely ludicrous.

Linked to the subject of 7000 new jobs at the airport, I raise again the proposal for 1020 new dwellings in Rawreth. It has been suggested by RDC that many of the new employees will need new accommodation and to achieve low levels of car use it would be sensible to provide dwellings in close proximity to the workplace thus enabling employees to walk or cycle to work.

This being the case, the proposed 'North of London Road' Rawreth site is eight miles from the airport and I would suggest that in general the car would be the method of commuting. Here again commuters would have to use the inadequate west to east routes.

Surely workforce dwellings should be within about two miles radius of the workplace to reduce traffic capacity and currently there are a number of areas to the north and north east of the airport to accommodate this. It may mean that some farmland and plotlands in the areas of Rochford and Ashingdon would have to be used but these are better suited to minimise traffic problems and could spare the need to erode the natural green belt between Rayleigh and the A130 trunk road at Rawreth.

Summary:

7000 new jobs at Southend Airport and more than 50% of the houses in the west of the district. Probably little walking or cycling to work. Poor public transport and an inadequate east/west route. Workers houses should be within a 2 mile radius of airport, to north or north east.

Change to Plan

Reduce the road traffic on the East/West route by locating more houses to the north or north east of the airport, Rochford west or Ashingdon, and reduce the amount in Rawreth.

Appear at exam? No

Soundness Tests i, ii

Core Strategy Submission Document

S - 16102 - 7336 - Policy T1 - Highways - None

16102 Support

CHAPTER 10 Policy T1 - Highways

Respondent: Rayleigh Town Council (Mrs K Cumberland) [7336] **Agent:** N/A

Rayleigh Town Council
The Pavilion
King George V Playing Field
Bull Lane
Rayleigh
Essex
SS6 8JD

01268 741880

Full Text: Policy T1 whilst generally supporting this it is felt that safeguards need to be built in to this policy to ensure that \$106 finance is actually used for the infrastructure improvements for which it is intended, particularly in the light of recent revelations of the loss of such monies.

Summary: Policy T1 whilst generally supporting this it is felt that safeguards need to be built in to this policy to ensure that \$106 finance is actually used for the infrastructure improvements for which it is intended, particularly in the light of recent revelations of the loss of such monies.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16126 - 7984 - Policy T1 - Highways - i

16126 Object

CHAPTER 10 Policy T1 - Highways

Respondent: Hockley Parish Plan Group (Mr T Gleadall) [7984] **Agent:** N/A

Hockley Parish Plan Group
2 Wood End
Hockley
Essex
SS5 4QL
01702 202892

Full Text: HPPG believes the plan is unsustainable in and around Hockley due to insufficient highway networks to support additional population numbers and traffic volumes with the majority of additional housing planned east of Hockley. Roads into Hockley are already highly congested at peak times. The Hockley Parish Plan published October 2007 states that Hockley roads cannot support additional vehicles without expensive improvements such as a bypass. A Resident Survey October 2009 concludes that traffic flow through Hockley will be at gridlock, especially, at the Spa roundabout, following Core Strategy housing proposals, Airport expansion proposals and Eldon Way redevelopment proposals

Summary: HPPG believes the plan is unsustainable in and around Hockley due to insufficient highway networks to support additional population numbers and traffic volumes with the majority of additional housing planned east of Hockley. Roads into Hockley are already highly congested at peak times. The Hockley Parish Plan published October 2007 states that Hockley roads cannot support additional vehicles without expensive improvements such as a bypass. A Resident Survey October 2009 concludes that traffic flow through Hockley will be at gridlock, especially, at the Spa roundabout, following Core Strategy housing proposals, Airport expansion proposals and Eldon Way redevelopment proposals

Change to Plan Infrastructure proposals related to highways are not enough to support the additional traffic, especially now that Eldon Way redevelopment is included in the Core Strategy with a reported 150-200 additional dwellings.

Appear at exam? No **Soundness Tests** i

Core Strategy Submission Document

O - 16128 - 10324 - Policy T1 - Highways - i, ii, iii

16128 Object

CHAPTER 10 Policy T1 - Highways

Respondent: Mrs Jennifer Abbey [10324]

3 Claybrick Avenue
Hockley
Essex
SS5 4PS
UK
07768 542634

Agent: N/A

Full Text: The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

Summary: The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

Change to Plan Revise approach

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

S - 16193 - 8119 - Policy T1 - Highways - None

16193 Support

CHAPTER 10 Policy T1 - Highways

Respondent: **Baltic Distribution Limited (Mr Robert Croshaw)** **Agent:** **N/A**
[8119]
Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
Essex
SS4 2HA
England
01702 258551

Full Text: With regard to para 2, we support this policy and look forward to its delivery in assisting us to ensure continuity of rural employment and imports/exports flowing through the Port facility

Summary: With regard to para 2, we support this policy and look forward to its delivery in assisting us to ensure continuity of rural employment and imports/exports flowing through the Port facility

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16282 - 12098 - Policy T1 - Highways - i

16282 Object

CHAPTER 10 Policy T1 - Highways

Respondent: Mr David Dare [12098]

1, Woodstock Crescent
Hockley Essex
SS5 4XG
UK
01702 205813

Agent: N/A

Full Text: Highway & Traffic Implications

1. Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;

* (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

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It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

3. RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local

16282 Object

CHAPTER 10 Policy T1 - Highways

Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

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4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

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6. Previous consultations ignored by RDC:

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* The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

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16282 Object

CHAPTER 10 Policy T1 - Highways

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7. RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

* The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

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8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

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The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

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Core Strategy Submission Document

16282 Object

CHAPTER 10 Policy T1 - Highways

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The Core Strategy is inaccurate, misleading and unsound.

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Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16283 - 12098 - Policy T1 - Highways - i

16283 Object

CHAPTER 10 Policy T1 - Highways

Respondent: Mr David Dare [12098]

1, Woodstock Crescent
Hockley Essex
SS5 4XG
UK
01702 205813

Agent: N/A

Full Text: Highway & Traffic Implications

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16283 Object

CHAPTER 10 Policy T1 - Highways

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16283 Object

CHAPTER 10 Policy T1 - Highways

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Core Strategy Submission Document

16283 Object

CHAPTER 10 Policy T1 - Highways

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Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16285 - 12098 - Policy T1 - Highways - i

16285 Object

CHAPTER 10 Policy T1 - Highways

Respondent: Mr David Dare [12098]

1, Woodstock Crescent
Hockley Essex
SS5 4XG
UK
01702 205813

Agent: N/A

Full Text: Highway & Traffic Implications

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16285 Object

CHAPTER 10 Policy T1 - Highways

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Summary:

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:

* The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

* The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

Previous consultations ignored by RDC:

The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

16285 Object

CHAPTER 10 Policy T1 - Highways

Thus the proposals are not founded on a robust and credible evidence base and are unsound

7. RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

* The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

* the Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!

* The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Summary:

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

the Foundry Industrial Estate has never even been previously mentioned;

The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

9. PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

10. THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food

Core Strategy Submission Document

16285 Object

CHAPTER 10 Policy T1 - Highways

shopping expenditure.

2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's

existing strengths, rather than retail expansion"

4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16300 - 14206 - Policy T1 - Highways - i

16300 Object

CHAPTER 10 Policy T1 - Highways

Respondent: Mr D Himsley [14206]

4 Brackendale Close
Hockley
Essex
SS5 5AP

Agent: N/A

Full Text: Please find the following objections: -

10 off Unsound Reasons.
1. Highway and Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

3. RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:
The Hockley Parish Plan (dated 2007). The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

7. RDC not consulted on proposals to relocate the Eldon Way and Foundry Industrial Estates

EW; CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" absolutely no consultation on concept of moving EW businesses entirely

FIE; has never even been previously mentioned in any plan version; CS states omission was due to typing error!

Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus proposals are not founded on a robust and credible evidence base and are unsound.

8. The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

Core Strategy Submission Document

16300 Object

CHAPTER 10 Policy T1 - Highways

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound

9. PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies"

Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which

does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise

residents how such changes will be made and the strategy is unsound.

10. The CS misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The CS states "The R&LS states Hockley has great potential and has a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) "does not lend itself to a food store capable of retaining a significant proportion of main food shopping expenditure.
- 2) "there is no immediate capacity for additional floor space."
- 3) "recommend that focus be maintained on developing Hockley's existing strengths."
- 4) " the Council may wish to consider reclassifying Hockley from a town center, to a district center".

Summary:

1. Highway and Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16301 - 14206 - Policy T1 - Highways - i

16301 Object

CHAPTER 10 Policy T1 - Highways

Respondent: Mr D Himsley [14206]

4 Brackendale Close
Hockley
Essex
SS5 5AP

Agent: N/A

Full Text: Please find the following objections: -

10 off Unsound Reasons.
1. Highway and Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

3. RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:
The Hockley Parish Plan (dated 2007). The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

7. RDC not consulted on proposals to relocate the Eldon Way and Foundry Industrial Estates

EW; CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" absolutely no consultation on concept of moving EW businesses entirely

FIE; has never even been previously mentioned in any plan version; CS states omission was due to typing error!

Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus proposals are not founded on a robust and credible evidence base and are unsound.

8. The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

Core Strategy Submission Document

16301 Object

CHAPTER 10 Policy T1 - Highways

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound

9. PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies"

Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which

does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise

residents how such changes will be made and the strategy is unsound.

10. The CS misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The CS states "The R&LS states Hockley has great potential and has a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) "does not lend itself to a food store capable of retaining a significant proportion of main food shopping expenditure.
- 2) "there is no immediate capacity for additional floor space."
- 3) "recommend that focus be maintained on developing Hockley's existing strengths."
- 4) " the Council may wish to consider reclassifying Hockley from a town center, to a district center".

Summary:

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16303 - 14206 - Policy T1 - Highways - i

16303 Object

CHAPTER 10 Policy T1 - Highways

Respondent: Mr D Himsley [14206]

4 Brackendale Close
Hockley
Essex
SS5 5AP

Agent: N/A

Full Text: Please find the following objections: -

10 off Unsound Reasons.
1. Highway and Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

3. RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:

The Hockley Parish Plan (dated 2007). The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

7. RDC not consulted on proposals to relocate the Eldon Way and Foundry Industrial Estates

EW; CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" absolutely no consultation on concept of moving EW businesses entirely

FIE; has never even been previously mentioned in any plan version; CS states omission was due to typing error!

Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus proposals are not founded on a robust and credible evidence base and are unsound.

8. The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

Core Strategy Submission Document

16303 Object

CHAPTER 10 Policy T1 - Highways

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound

9. PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies"

Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which

does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise

residents how such changes will be made and the strategy is unsound.

10. The CS misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The CS states "The R&LS states Hockley has great potential and has a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) "does not lend itself to a food store capable of retaining a significant proportion of main food shopping expenditure.

2) "there is no immediate capacity for additional floor space."

3) "recommend that focus be maintained on developing Hockley's existing strengths."

4) " the Council may wish to consider reclassifying Hockley from a town center, to a district center".

Summary:

3. RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

S - 16387 - 8267 - Policy T1 - Highways - None

16387 Support

CHAPTER 10 Policy T1 - Highways

Respondent: Aber Ltd [8267]

Aber Ltd
C/o Agent

Agent: Colliers CRE (Mr S Chapman) [8266]

Colliers CRE
9 Marylebone Lane
London
W1U 1HL
020 7344 6533

Full Text: Developments located in sustainable locations will assist in reducing the need to travel by private vehicles.

Summary: Developments located in sustainable locations will assist in reducing the need to travel by private vehicles.

Change to Plan N/A

Appear at exam? No **Soundness Tests** N/A

Core Strategy Submission Document

O - 16438 - 14218 - Policy T1 - Highways - iii

16438 Object

CHAPTER 10 Policy T1 - Highways

Respondent: Barbara Havey [14218]

71 Main Road
Hockley
Essex
SS5 4RG

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.
â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound
RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is

16438 Object

CHAPTER 10 Policy T1 - Highways

also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

Summary:

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

Previous consultations ignored by RDC:

â€¢ The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

â€¢ The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

Previous consultations ignored by RDC:

The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates
â€¢ The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely
â€¢ the Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!
â€¢ The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Summary:

Core Strategy Submission Document

16438 Object

CHAPTER 10 Policy T1 - Highways

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates
â€¢ The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely
â€¢ the Foundry Industrial Estate has never even been previously mentioned;
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Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

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The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

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Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and

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CHAPTER 10 Policy T1 - Highways

providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

Change to Plan

Appear at exam?	Not Specified	Soundness Tests	iii
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Core Strategy Submission Document

O - 16439 - 14218 - Policy T1 - Highways - i

16439 Object

CHAPTER 10 Policy T1 - Highways

Respondent: Barbara Havey [14218]

71 Main Road
Hockley
Essex
SS5 4RG

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.
â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

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The Core Strategy also contravenes its own policy T1 and is unsound.

The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound
RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is

16439 Object

CHAPTER 10 Policy T1 - Highways

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PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

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Core Strategy Submission Document

O - 16439 - 14218 - Policy T1 - Highways - i

16439 Object

CHAPTER 10 Policy T1 - Highways

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Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16441 - 14218 - Policy T1 - Highways - i

16441 Object

CHAPTER 10 Policy T1 - Highways

Respondent: Barbara Havey [14218]

71 Main Road
Hockley
Essex
SS5 4RG

Agent: N/A

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Core Strategy Submission Document

O - 16441 - 14218 - Policy T1 - Highways - i

16441 Object

CHAPTER 10 Policy T1 - Highways

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16441 Object

CHAPTER 10 Policy T1 - Highways

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Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16485 - 9646 - Policy T1 - Highways - i

16485 Object

CHAPTER 10 Policy T1 - Highways

Respondent: Mrs Margaret Christian [9646]

41 Westminster Drive
Hockley
Essex
SS5 4XD
01702 204320

Agent: N/A

Full Text: Please find enclosed my objection to the Core Strategy Submission DPD. Please kindly acknowledge receipt of this objection and duly register it.

Objections to RDC's Core Strategy Submission DPD

Reason Unsound

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The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

16485 Object

CHAPTER 10 Policy T1 - Highways

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The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. Thus it is unclear if use of Standard Charges is financially viable.

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Core Strategy Submission Document

16485 Object

CHAPTER 10 Policy T1 - Highways

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The Core Strategy also contravenes its own policy T1 and is unsound.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16486 - 9646 - Policy T1 - Highways - i

16486 Object

CHAPTER 10 Policy T1 - Highways

Respondent: Mrs Margaret Christian [9646]

41 Westminster Drive
Hockley
Essex
SS5 4XD
01702 204320

Agent: N/A

Full Text: Please find enclosed my objection to the Core Strategy Submission DPD. Please kindly acknowledge receipt of this objection and duly register it.

Objections to RDC's Core Strategy Submission DPD

Reason Unsound

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16486 Object

CHAPTER 10 Policy T1 - Highways

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Core Strategy Submission Document

16486 Object

CHAPTER 10 Policy T1 - Highways

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Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16525 - 13921 - Policy T1 - Highways - i

16525 Object

CHAPTER 10 Policy T1 - Highways

Respondent: Ms H Rozga [13921]

56A Aldermans Hill
Hockley
Essex
SS5 4RW

Agent: N/A

Full Text:

1. Highway & Traffic Implications

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16525 Object

CHAPTER 10 Policy T1 - Highways

Summary:

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CHAPTER 10 Policy T1 - Highways

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Summary

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There are also inconsistencies between the Core Strategy & HAAP.

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9. PPS12, 4.6, states that Cores Strategies show be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which do not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

10. The Core Strategy misrepresent the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.

2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion".

4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6.

Core Strategy Submission Document

16525 Object

CHAPTER 10 Policy T1 - Highways

Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) "the Council may wish to consider reclassifying Hockley from a town centre to a district centre.

Summary:

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus service are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16526 - 13921 - Policy T1 - Highways - i

16526 Object

CHAPTER 10 Policy T1 - Highways

Respondent: Ms H Rozga [13921]

56A Aldermans Hill
Hockley
Essex
SS5 4RW

Agent: N/A

Full Text:

1. Highway & Traffic Implications

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The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

3. RCD are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

16526 Object

CHAPTER 10 Policy T1 - Highways

Summary:

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4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. Thus it is unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of address the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

Summary:

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

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The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

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The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

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7. RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates.

The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely.

The Foundry Industrial Estates has never even been previously mentioned in any plan version; A recent amendment to

16526 Object

CHAPTER 10 Policy T1 - Highways

the Core Strategy acknowledges this omission was due to a typing error!

The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Summary:

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The Foundry Industrial Estate has never even been previously mentioned.

The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate.

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing HAAP consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy or Hockley Area Action Plan (HAAP) defines its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

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Core Strategy Submission Document

16526 Object

CHAPTER 10 Policy T1 - Highways

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Summary:

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16528 - 13921 - Policy T1 - Highways - i

16528 Object

CHAPTER 10 Policy T1 - Highways

Respondent: Ms H Rozga [13921]

56A Aldermans Hill
Hockley
Essex
SS5 4RW

Agent: N/A

Full Text:

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

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It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

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16528 Object

CHAPTER 10 Policy T1 - Highways

Summary:

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16528 Object

CHAPTER 10 Policy T1 - Highways

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Summary

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Core Strategy Submission Document

16528 Object

CHAPTER 10 Policy T1 - Highways

Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) "the Council may wish to consider reclassifying Hockley from a town centre to a district centre.

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Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16543 - 13667 - Policy T1 - Highways - i

16543 Object

CHAPTER 10 Policy T1 - Highways

Respondent: G and S Cooke [13667]

56 Aldermans Hill
Hockley
Essex
SS5 4RW

Agent: N/A

Full Text:

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus service are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

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The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

Summary:

Proposals for moving employment to of town locations, at either end of the district, with no existing public transport inks, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

3. RCD are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in

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the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts.

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4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs not, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. Thus it is unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of address the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

Summary:

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

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5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:

The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

Previous consultations ignored by RDC:

The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

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7. RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates.

The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely.

The Foundry Industrial Estates has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy acknowledges this omission was due to a typing error!

The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

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Summary:

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates.

The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing FW businesses entirely.

The Foundry Industrial Estate has never even been previously mentioned.

The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate.

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing HAAP consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy or Hockley Area Action Plan (HAAP) defines its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

9. PPS12, 4.6, states that Cores Strategies show be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which do not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

10. The Core Strategy misrepresent the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.

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2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion".

4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) "the Council may wish to consider reclassifying Hockley from a town centre to a district centre.

Summary: Proposals for moving employment to of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

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Respondent: G and S Cooke [13667]

56 Aldermans Hill
Hockley
Essex
SS5 4RW

Agent: N/A

Full Text:

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus service are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

Summary:

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The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

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3. RCD are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in

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the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

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Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of address the railway bridge bottleneck will be significant but is not mentioned.

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Neither the Core Strategy or Hockley Area Action Plan (HAAP) defines its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary

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There are also inconsistencies between the Core Strategy & HAAP.

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The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.

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2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion".

4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) "the Council may wish to consider reclassifying Hockley from a town centre to a district centre.

Summary:

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

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O - 16546 - 13667 - Policy T1 - Highways - i

16546 Object

CHAPTER 10 Policy T1 - Highways

Respondent: G and S Cooke [13667]

56 Aldermans Hill
Hockley
Essex
SS5 4RW

Agent: N/A

Full Text:

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus service are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

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It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

Summary:

Proposals for moving employment to of town locations, at either end of the district, with no existing public transport inks, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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the Core Strategy can be delivered."

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CHAPTER 10 Policy T1 - Highways

7. RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates.

The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely.

The Foundry Industrial Estates has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy acknowledges this omission was due to a typing error!

The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

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RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates.

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8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing HAAP consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy or Hockley Area Action Plan (HAAP) defines its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

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9. PPS12, 4.6, states that Cores Strategies show be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which do not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

10. The Core Strategy misrepresent the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.

Core Strategy Submission Document

O - 16546 - 13667 - Policy T1 - Highways - i

16546 Object

CHAPTER 10 Policy T1 - Highways

2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion".

4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

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Summary:

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Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts.

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16576 - 14231 - Policy T1 - Highways - i

16576 Object

CHAPTER 10 Policy T1 - Highways

Respondent: Heather Wakefield [14231]

Not provided

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighboring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.
â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Core Strategy Submission Document

16576 Object

CHAPTER 10 Policy T1 - Highways

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PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

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SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

Previous consultations ignored by RDC:

• The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

• The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

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Core Strategy Submission Document

O - 16576 - 14231 - Policy T1 - Highways - i

16576 Object

CHAPTER 10 Policy T1 - Highways

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Change to Plan

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

Core Strategy Submission Document

O - 16576 - 14231 - Policy T1 - Highways - i

16576 Object

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Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16577 - 14231 - Policy T1 - Highways - i

16577 Object

CHAPTER 10 Policy T1 - Highways

Respondent: Heather Wakefield [14231]

Not provided

Agent: N/A

Full Text:

Highway & Traffic Implications

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Core Strategy Submission Document

O - 16577 - 14231 - Policy T1 - Highways - i

16577 Object

CHAPTER 10 Policy T1 - Highways

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Core Strategy Submission Document

O - 16577 - 14231 - Policy T1 - Highways - i

16577 Object

CHAPTER 10 Policy T1 - Highways

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Core Strategy Submission Document

O - 16577 - 14231 - Policy T1 - Highways - i

16577 Object

CHAPTER 10 Policy T1 - Highways

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16579 - 14231 - Policy T1 - Highways - i

16579 Object

CHAPTER 10 Policy T1 - Highways

Respondent: Heather Wakefield [14231]

Not provided

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighboring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.
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It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

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RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

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The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Core Strategy Submission Document

O - 16579 - 14231 - Policy T1 - Highways - i

16579 Object

CHAPTER 10 Policy T1 - Highways

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PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

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Previous consultations ignored by RDC:

• The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

• The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

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RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

• The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

• the Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!

• The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

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Core Strategy Submission Document

O - 16579 - 14231 - Policy T1 - Highways - i

16579 Object

CHAPTER 10 Policy T1 - Highways

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Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

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PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.
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Core Strategy Submission Document

O - 16579 - 14231 - Policy T1 - Highways - i

16579 Object

CHAPTER 10 Policy T1 - Highways

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16594 - 14232 - Policy T1 - Highways - i

16594 Object

CHAPTER 10 Policy T1 - Highways

Respondent: Roger Wakefield [14232]

Not provided

SS5 4UX

Agent: N/A

Full Text:

Highway & Traffic Implications

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O - 16594 - 14232 - Policy T1 - Highways - i

16594 Object

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Core Strategy Submission Document

16594 Object

CHAPTER 10 Policy T1 - Highways

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Change to Plan

Core Strategy Submission Document

O - 16594 - 14232 - Policy T1 - Highways - i

16594 Object

CHAPTER 10 Policy T1 - Highways

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16595 - 14232 - Policy T1 - Highways - i

16595 Object

CHAPTER 10 Policy T1 - Highways

Respondent: Roger Wakefield [14232]

Not provided

SS5 4UX

Agent: N/A

Full Text:

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Core Strategy Submission Document

O - 16595 - 14232 - Policy T1 - Highways - i

16595 Object

CHAPTER 10 Policy T1 - Highways

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The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

Summary:

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

Previous consultations ignored by RDC:

• The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

• The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

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• The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

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Core Strategy Submission Document

16595 Object

CHAPTER 10 Policy T1 - Highways

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Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

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PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.
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- The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Summary:

The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

Change to Plan

Core Strategy Submission Document

O - 16595 - 14232 - Policy T1 - Highways - i

16595 Object

CHAPTER 10 Policy T1 - Highways

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16597 - 14232 - Policy T1 - Highways - i

16597 Object

CHAPTER 10 Policy T1 - Highways

Respondent: Roger Wakefield [14232]

Not provided

SS5 4UX

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighboring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

16597 Object

CHAPTER 10 Policy T1 - Highways

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PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

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Core Strategy Submission Document

16597 Object

CHAPTER 10 Policy T1 - Highways

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Core Strategy Submission Document

O - 16597 - 14232 - Policy T1 - Highways - i

16597 Object

CHAPTER 10 Policy T1 - Highways

Change to Plan

Appear at exam? Not Specified Soundness Tests i

Core Strategy Submission Document

O - 16712 - 7834 - Policy T1 - Highways - i

16712 Object

CHAPTER 10 Policy T1 - Highways

Respondent: Ms G Yeadell [7834]

6 Southend Road
Hockley
Essex
SS5 4QQ
01702 205450

Agent: N/A

Full Text: Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1

Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2 you discarded N.E.Hockley as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley..along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

Response to C.S Preferred Options 2008 and HAAP 2009

June 2009 issue C S Submission issue says Eldon Way will be used for housing, whereas Sept.2009 issue says "alternative uses, including residential.." to be decided by HAAP (Issues consultation done, Pref.Options issue awaited, but judging from JAAP Pref.Options decision - namely biggest option chosen against overriding opposition, it will be housing).

Need to be logical and even-handed in proposals

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

Establish likely level of Standard Charges. Accept you cannot turn district into motorways with wholesale demolition.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

Para.10.5 "..highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which cannot be altered without much destruction.

Reply to CS Pref. Options 2008 & HAAP Issues/Options 2009

Policy T3, CLT1 Appendix CLT1 Public transport RDC admits this is in the private sector. In Hockley, operator has cut No7 service to 1 per hour from Ashingdon Schools, claiming it is unviable beyond. This is unlikely to change as Hockley is car dependant. No8 bus through Hawkwell is cut to 1 per hour to Rayleigh, for same reason as No7. Proposed planning agreements with developers can't run: eg, a community centre or classroom given by a developer remains once he has moved on - how can that apply for an on-going bus service?

Reply to Infrastructure Transport in CS Pref. Opts. 2008 and to HAAP Issues Opts. 2009.

Ch.11 Economic development

Policy ED3 Core Strategy preferred Options 2008 hinted at possible housing in Eldon Way site. June 2009 Submission version, without consultation, said Eldon Way would be housing (map included Foundry, not the text). September 2009 Submission said redevelopment would be in HAAP (which apart from the Issues/Options version, is unfinished. Judging from results of JAAP Preferred Options where biggest option is chosen, though most respondents were against it, site will be housing, without consultation.

Core Strategy Submission Document

O - 16712 - 7834 - Policy T1 - Highways - i

16712 Object

CHAPTER 10 Policy T1 - Highways

Para.1.25, Para.11.32 Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to accommodate employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

Reply to HAAP Issues Options 2009

Remove compulsory relocation

Policy ED4 Policy states Council will allocate 18ha of land to make up for de-allocations in ED3 - that proves point above.

Proposals for moving employment to out of town locations with no existing transport links are contrary to government policies PPG4, PPS1 and PPS4 and Core Strategy Policy T1.

Evidence Base is ignored by contravening Hockley Parish Plan 2007 and ignoring residents' views on HAAP Issues/Options. Next stage of HAAP Preferred Options is pre-empted and rendered irrelevant. Core Strategy plans to relocate Eldon Way Foundry estate to Greenfield site with no nearby bus or railway. RDC plans to upgrade the nearest road to dual carriageway, though the connecting B1013 (through Hockley) will stay single, said by ECC Highways statistics to be 72% capacity. Airport bosses and council cannot suggest there will be no traffic growth from JAAP and new industrial site.

Reply to Hockley Parish Plan 2007. HAAP Issues 2009

Move to new industrial site near airport contravenes PPS4:

- EC7.3C "out of centre sites, with preference given to sites...well served by choice of...transport and...close to centre and...high likelihood of forming links with centre". There is no current public transport and links with centres is unlikely".

- EC 7.5.1 "whether the site is or will be accessible and well served by choice of transport, public transport, walking and cycling, as well as by car...". Remote location, narrow busy B1013 makes the site unsuitable for access by cycle or on foot.

It also contravenes PPS1 (27vii)... "reduce need to travel, encourage accessible public transport provision to secure more sustainable patterns of transport...Planning should actively manage patterns of urban growth to make fullest use of public transport and focus development in existing centres, near to major public transport interchanges". Core Strategy undermines its own policy Transport and Highways policy T1 and is unsound.

Although shown on accompanying drawing in earlier versions, there was no prior textual mention of Foundry industrial estate (next to Eldon Way) for redevelopment until current CS 2009 Submission. This was stated to be a typing error, but does not inspire confidence in reliability of drafting.

Revise both 2009 Core Strategy and 2009 HAAP Issues/options

Chapter 12: Retail/Town centres

The Core Strategy misrepresents findings of the Retail and Leisure Study 2008.

Para.12.38 The Core Strategy states (para.12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace."

Whereas the R&LS actually states:

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Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

The Council will work with landowners and its partners to deliver the HAAP.

Remove threat of compulsory purchase orders.

Core Strategy Submission Document

O - 16712 - 7834 - Policy T1 - Highways - i

16712 Object

CHAPTER 10 Policy T1 - Highways

One doesn't perceive impartiality when the Planning Director replies to local HAAP survey with "The affluent people of Hockley are entitled to famous name shops".

Chapter 5: Character of Place and Local Lists

Para.5.4 "Rochford district has unique character..stems from traditional buildings..still dominate towns and villages".

Para.5.17 "Council believes many buildings..are of local distinctiveness..part of..cherished local scene".

This only applies to favoured places: Rochford, Rayleigh, greenbelt villages. Many Hockley conservable items have been systemically removed for supposedly lucrative development in face of widespread protect. This is for supposed need for housing. In fact heritage items have been replaced by dwellings most cannot afford, and/or are hard to sell due to unsuitability of massing and siting. Many other homes are jeopardised by this practice.

HAAP issues 2009. Core Strategy 2006, 2007,2008, SCI.2006

Fewer 'vested interests', more even handedness. No more pressing people out of businesses, homes for expediency.

A CPRE Fieldwork issue extolled Local Lists, citing refusal of 16 flats to replace character house, not on local list. Inspector said house, facade made a contribution to area character, even if English heritage decided it didn't warrant listing. Council worked to get the house grade listed and even made adjacent area conservation one.

Hockley had one such on a "significant site" faced with 13 flats. Ward Member omitted house from refusal proposal, so house could be demolished. RDC dropped Local List ahead of appeal: "Government frowned on such Lists" (Other LAs, unaware of supposed directive retained theirs. After demolition RDC restored Local Lists, saying Government now support them. When Inspector queried the complaint, the then policy officer said "just politics, lot of local interest, nothing of character in the area[!]. (A dozen such items had been removed). Some "distinctive" Hockley buildings are still condemned (in Greensward Lane.; others threatened (Spa Road). Whereas a modest hue and cry in Rayleigh will usually result in a building being saved.

Conclusion

Core Strategy Submission DPD is basically unsound in many respects

Incomplete information. Amongst others, it refers to Hockley AAP, the first stage of which is complete, but not other three. Rochford AAP first stage has been published in arrears of Core Strategy Submission. Rayleigh AAP is still awaited. Precise housing sites are absent, as Urban Capacity Study 2007 has been superseded by Strategic Housing Land Availability Assessment, not yet published. Traders, residents, are thus responding to Core Strategy Submission with incomplete information.

Lack of community involvement. Chapter 1, Introduction, para. 1.11 "Community involvement is an essential part of the plan making process".

In Statement of Community Involvement 2006 Rochford RDC "recognises need to enable people to have their voices heard".

Re Public Meetings: "Consideration will be had to timing and venue to ensure meeting is as accessible as possible".

Take Hockley Area Action Plan as an example of the opposite of all this:- Presentation of document was at Hullbridge, 7.30pm. It was also discussed with JAAP at Rochford Freight House (for traders only) at 7am, without publicity. Excuse made: HAAP on RDC website, which none will seek unless knowing it is there. Rochford District Matters newsheet had minute articles on p.3, half way through consultation period. Another excuse: a 2nd presentation by Hockley Residents Association with planning officer present: only because of complaints, and it is not the HRA's responsibility to RDC's job. Due to unavoidable haste of calling meeting, few knew and only 50 were present.

In Core Strategy Submission Hockley Parish Plan has been ignored. Proposals also ignore 95% rejection rate response to HAAP 2009, which included proposals for Eldon Way employment site.

Unfettered right of developers to carry on as if Core Strategy didn't exist. In PPS 12, Ch.4.6 states: "Core Strategies should be flexible and able to show how they handle contingencies". Several large planning applications have been submitted proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS 12.

Where are we? Finally, at Chapter 1, Introduction, para. 1.24: "the Core Strategy will have to be reviewed in the event of a new Local Area Agreement, post-2011, setting different priorities". So what purpose does all this work serve? So we have hardly finished this exercise, before it all starts again?

Summary:

Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and

Core Strategy Submission Document

O - 16712 - 7834 - Policy T1 - Highways - i

16712 Object

CHAPTER 10 Policy T1 - Highways

contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

Change to Plan

Establish likely level of Standard Charges. Accept you cannot turn district into motorways with wholesale demolition.

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16727 - 14244 - Policy T1 - Highways - i, ii

16727 Object

CHAPTER 10 Policy T1 - Highways

Respondent: Highways Agency (Mr C Shaw) [14244]

Highways Agency
2nd Floor
Woodlands
Manton Lane
Bedford
MK41 7LW
01234 796122

Agent: N/A

Full Text:

Thank you for inviting the Highways Agency (HA) to comment on the Rochford Core Strategy (CS) Submission Document and Rochford Area Action plan (AAP) prepared by Rochford District Council

As you are aware the HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's motorway and all-purpose trunk road network, collectively known as the Strategic Road Network (SRN), on behalf of the Secretary of State for Transport.

In spatial planning and development control terms, we have a duty to safeguard the operation of the motorway and trunk road network as set out in the Department for Transport Circular: 02/2007: Planning and the Strategic Road Network. <http://www.dft.gov.uk/pgr/regional/strategy/policy/circular207planningandstrategic>. The circular encourages the HA to work co-operatively with Local Planning Authorities within the framework of the Government's policies for planning, growth areas, regeneration, integrated transport and sustainability. We look to your Council's Local Development Framework to promote strategies, policies and land allocations which would support alternatives to the private car.

In the case of Rochford there are no trunk roads within the District although there are two strategic corridors namely the A13 and A127/A1159 which connect into the M25 motorway network at Junctions 30 and 29 respectively. Sections of these areas are currently heavily congested, particularly during peak periods, and operate under considerable levels of network stress. Therefore it is important to the HA that the impact of major development proposals in the Rochford area is considered within the context of future impact on the M25 and the A13 Trunk Road.

Please see below some general comments regarding the soundness of the CS and SSA from a transport perspective, referring to specific proposed submission policies as necessary. This response has been completed with reference to paragraph 4.52 of PPS12 (2008) PPS12, paragraph 4.52 - To be 'sound' a core strategy should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY.

CORE STRATEGY

Policy GB1 - Green Belt Protection

The HA acknowledges that only the minimum amount of Green Belt land will be allocated to meet the District's housing and employment needs as necessary. However, the HA is concerned that any proposed redevelopment of greenbelt sites could result in development in areas with limited access to sustainable transport modes therefore resulting in higher levels of car usage and subsequent impact on the SRN. Although the HA recognizes that new public transport hubs that would facilitate the use of non-car modes could be developed over time, this process is likely to require very substantial investment.

It is therefore important that an appropriate assessment of infrastructure requirements is performed for development sites on Green Belt land. Funding towards the necessary public transport infrastructure improvements must be sought and secured prior to occupation of any new development on greenbelt land. Furthermore, the occupation of such developments should be phased in line with necessary transport infrastructure. This will help the CS meet the PPS12 requirement that a sound DPD should be 'justified' and 'effective' and hence deliverable.

Policy T1 - Highways

Policy T1 highlights the need to reduce reliance on the private car but also observes that 'some impact on the highway network is inevitable'. In a District with such high levels of private car ownership and a limited public transport network, as stated in paragraph 10.2, it will be important to assess the potential impacts to the highway network and ensure that mitigation measures are proposed and implemented where necessary.

An emphasis should be placed on the provision and improvement of sustainable transport infrastructure, particularly where high trip-generating developments such as offices are proposed. In line with the DfT's Guidance on Transport Assessment (2007) - DfT GTA, paragraph 4.51 - 'The key issue is the need to ensure that development proposals strive to achieve nil detriment ('no worse off') to the strategic network, for the opening year and appropriate horizon year'. This emphasis will assist in mitigating potential increases in private vehicle trips and hence help ensure that there is a nil-detriment effect on the SRN.

Policy T3 - Public Transport

Core Strategy Submission Document

O - 16727 - 14244 - Policy T1 - Highways - i, ii

16727 Object

CHAPTER 10 Policy T1 - Highways

The recent Planning Inspectorate 'LDF - Learning from Experience' document (September 2009) suggests that a Core Strategy should identify a clear source of funding for infrastructure for at least the first 5 years of the plan - The Planning Inspectorate, LDF: Examining DPDs: Learning from experience, September 2009, Paragraph 22 - 'For at least the first 5 years of the plan it should be clear what infrastructure is required, who is going to fund and provide it and how it is to relate to the rate of development'.. Paragraph 10.15 of the CS highlights the importance of public transport links for new developments and implies that developers may be required to contribute towards public transport provision. However, it is noted that developer contributions cannot be expected to pay for all transport improvements and as such, in line with the recent Planning Inspectorate document outlined above additional sources of funding should be identified. It is recommended that alternative sources of funding for public transport improvements are clearly outlined within the CS to ensure that adequate infrastructure provision is made.

Policy T4 - South Essex Rapid Transit

As mentioned in our response to the Core Strategy Issues and options consultation the HA is supportive of this policy and the need to progress the route through South Essex. This has the potential to reduce the impact on the SRN (A13).

Policy T5 - Travel Plans

The HA welcomes the requirement for a travel plan for developments involving both destination and origin trips. However it is noted that no threshold for employment sites have been specified. Essex County Council requires the production of a workplace travel plan for developments with over 50 employees or where there will be a significant impact on the local road network. To avoid ambiguity for developers, the HA recommends that the Rochford District Core Strategy specifies a similar threshold within Policy T5. This will ensure the Core Strategy is in line with PPG13 paragraph 87 - PPG13 - 'Local authorities are expected to consider setting local targets for the adoption of travel plans by local businesses and other organizations..'

Policy ED2 - London Southend Airport

The HA previously responded to the London Southend and Environs Joint Area Action Plan Preferred Options Document (March 2009). As such, we have not repeated our comments here but instead refer you to our consultation response dated 31 March 2009.

Summary:

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Policy T1 highlights the need to reduce reliance on the private car but also observes that 'some impact on the highway network is inevitable'. In a District with such high levels of private car ownership and a limited public transport network, as stated in paragraph 10.2, it will be important to assess the potential impacts to the highway network and ensure that mitigation measures are proposed and implemented where necessary.

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Change to Plan

Appear at exam? Not Specified

Soundness Tests i, ii

Core Strategy Submission Document

O - 16744 - 14229 - Policy T1 - Highways - i, iii

16744 Object

CHAPTER 10 Policy T1 - Highways

Respondent: Hockley Under Threat (J Abbey) [14229]

Hockley Under Threat
None provided

Agent: N/A

Full Text:

Ch. 4 Housing; Ch.10 Transport, Highways; Ch.11 Economic Development; Ch.12 Retail/town centres; Ch.5 Character of place & Local Lists

Chapter 4: Housing

Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1, Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2

N.E.Hockley was discarded as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley...along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

Need to be logical and even-handed in proposals

June 2009 issue C S Submission issue says Eldon Way will be used for housing, whereas Sept.2009 issue says "alternative uses, including residential.." to be decided by HAAP (Issues consultation done, Pref.Options issue awaited, but judging from JAAP Pref.Options decision - namely biggest option chosen against overriding opposition, it will be housing).

Policy H1, T1 Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG14 & PPS1. it also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths",

The Core Strategy also contravenes its own policy T1 and is unsound.

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

Establish like motorways with wholesale demolition.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts.

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Para.10.5

Policy T3, CLT1 Appendix CLT1

T1 & T2 "...highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which

16744 Object

CHAPTER 10 Policy T1 - Highways

cannot be altered without much destruction.

Public transport RDC admits this is in the private sector. In Hockley, operator has cut No 7 service to one per hour from Ashingdon Schools, claiming it is unviable beyond. This is unlikely to change as Hockley is car dependant. No 8 bus through Hawkwell is cut to one per hour to Rayleigh, for same reason as No 7. Proposed planning agreements with developers can't run: e.g., a community centre or classroom given by a developer remains once he has moved on - how can that apply for an on-going bus service?

Ch.11 Economic development

Policy ED3 Core Strategy preferred Options 2008 hinted at possible housing in Eldon Way site. June 2009 Submission version, without consultation, said Eldon Way would be housing (map included Foundry, not the text). September 2009 Submission said redevelopment would be in HAAP (which apart from the Issues/Options version, is unfinished. Judging from results of JAAP Preferred Options where biggest option is chosen, though most respondents were against it, site will be housing, without consultation.

Para.1.25 Para.11.32

Policy ED4 T1 & T2 Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to accommodated employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

Remove compulsory relocation

Policy states Council will allocate 18ha of land to make up for de-allocations in ED3 - that proves point above.

Proposals for moving employment to out of town locations with no existing transport links are contrary to government policies PPG4, PPS1 and PPS4 and Core Strategy Policy T1.

Evidence Base is ignored by contravening Hockley Parish Plan 2007 and ignoring residents' views on HAAP Issues/Options. Next stage of HAAP Preferred Options is pre-empted and rendered irrelevant.

Core Strategy plans to relocate Eldon Way Foundry estate to Greenfield site with no nearby bus or railway. RDC plans to upgrade the nearest road to dual carriageway, though the connecting B1013 (through Hockley) will stay single, said by ECC Highways statistics to be 72% capacity. Airport bosses and council cannot suggest there will be no traffic growth from JAAP and new industrial site.

Revise both 2009 Core Strategy and 2009 HAAP Issues/options

Move to new industrial site near airport contravenes PPS4:

EC7.3C "out of centre sites, with preference given to sites..well served by choice of..transport and..close to centre and..high likelihood of forming links with centre". There is no current public transport and links with centres is unlikely".

EC 7.5.1 "whether the site is or will be accessible and well served by choice of transport, public transport, walking and cycling, as well as by car..". Remote location, narrow busy B1013 makes the site unsuitable for access by cycle or on foot.

It also contravenes PPS1 (27vii).. "reduce need to travel, encourage accessible public transport provision to secure more sustainable patterns of transport..Planning should actively manage patterns of urban growth to make fullest use of public transport and focus development in existing centres, near to major public transport interchanges". Core Strategy undermines its own policy Transport and Highways policy T1 and is unsound.

H1 & RTC6 Although shown on accompanying drawing in earlier versions, there was no prior textual mention of Foundry industrial estate (next to Eldon Way) for redevelopment until current CS 2009 Submission. In recent amendment to the CS this was stated to be due to a typing error!

Chapter 12: Retail/Town centres

The Core Strategy misrepresents findings of the Retail and Leisure Study 2008.

Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

Para.12.38 H1 & RTC6 The Core Strategy states (para.12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace."

Whereas the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food

Core Strategy Submission Document

O - 16744 - 14229 - Policy T1 - Highways - i, iii

16744 Object

CHAPTER 10 Policy T1 - Highways

shopping expenditure".

2) (10.28) "There is no immediate capacity for additional floorspace".

3) (10.29) "we recommend focus be maintained on developing Hockley's existing strengths, rather than retail expansion"

4) 10.31 "the current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it has a very small catchment population. Accordingly, the council may wish to consider reclassifying Hockley from a town centre to a district centre".

Remove threat of compulsory purchase orders.

The Council will work with landowners and its partners to deliver the HAAP.

Chapter 5: Character of Place and Local Lists

Para.5.4 "Rochford district has unique character..stems from traditional buildings..still dominate towns and villages".

Para.5.17 "Council believes many buildings..are of local distinctiveness..part of..cherished local scene".

This only appears to apply to certain places: Rochford, Rayleigh, greenbelt villages. Many Hockley conservable items have been systemically removed for supposedly lucrative development in face of widespread protect. This is for supposed need for housing. In fact heritage items have been replaced by dwellings most cannot afford, and/or are hard to sell due to unsuitability of massing and siting. Many other homes are jeopardised by this practice.

Conclusion

Core Strategy Submission DPD is basically unsound in many respects:

Incomplete information. Amongst others, it refers to Hockley AAP, the first stage of which is complete, but not other three. Rochford AAP first stage has been published in arrears of Core Strategy Submission. Rayleigh AAP is still awaited. Precise housing sites are absent, as Urban Capacity Study 2007 has been superseded by Strategic Housing Land Availability Assessment, not yet published. Traders, residents, are thus responding to Core Strategy Submission with incomplete information.

Lack of community involvement. Chapter 1, Introduction, para. 1.11 "Community involvement is an essential part of the plan making process". In Statement of Community Involvement 2006 Rochford RDC "recognises need to enable people..to have their voices heard".

Re Public Meetings: "Consideration will be had to timing and venue to ensure meeting is as accessible as possible".

Hockley Area Action Plan as an example of the opposite of all this:- Presentation of document was at Hullbridge, 7.30 p.m. It was also discussed with JAAP at Rochford Freight House (for traders only) at 7 a.m., without publicity. Excuse made: HAAP on RDC website, which none will seek unless knowing it is there. Rochford District Matters newssheet had minute articles on p.3, half way through consultation period. Another excuse: a second presentation by Hockley Residents Association with planning officer present: only because of complaints, and it is not the HRA's responsibility to RDC's job. Due to unavoidable haste of calling meeting, few knew and only 50 were present.

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Summary:

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

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Core Strategy Submission Document

O - 16744 - 14229 - Policy T1 - Highways - i, iii

16744 Object

CHAPTER 10 Policy T1 - Highways

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Change to Plan Establish like motorways with wholesale demolition.

Appear at exam? Not Specified **Soundness Tests** i, iii

Core Strategy Submission Document

O - 16750 - 14229 - Policy T1 - Highways - i, iii

16750 Object

CHAPTER 10 Policy T1 - Highways

Respondent: Hockley Under Threat (J Abbey) [14229]

Hockley Under Threat
None provided

Agent: N/A

Full Text:

Ch. 4 Housing; Ch.10 Transport, Highways; Ch.11 Economic Development; Ch.12 Retail/town centres; Ch.5 Character of place & Local Lists

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Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

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Core Strategy Submission Document

O - 16750 - 14229 - Policy T1 - Highways - i, iii

16750 Object

CHAPTER 10 Policy T1 - Highways

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Summary:

Policy T3 CLT1 Appendix CLT1 T1 & T2

Public transport RDC admits this is in the private sector. In Hockley, operator has cut No 7 service to one per hour from Ashingdon Schools, claiming it is unviable beyond. This is unlikely to change as Hockley is car dependant. No 8 bus through Hawkwell is cut to one per hour to Rayleigh, for same reason as No 7. Proposed planning agreements with developers can't run: e.g., a community centre or classroom given by a developer remains once he has moved on - how can that apply for an on-going bus service?

Change to Plan

Appear at exam? Not Specified

Soundness Tests i, iii

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

Core Strategy Submission Document

O - 16756 - 14229 - Policy T1 - Highways - i, iii

16756 Object

CHAPTER 10 Policy T1 - Highways

Respondent: Hockley Under Threat (J Abbey) [14229]

Hockley Under Threat
None provided

Agent: N/A

Full Text:

Ch. 4 Housing; Ch.10 Transport, Highways; Ch.11 Economic Development; Ch.12 Retail/town centres; Ch.5 Character of place & Local Lists

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Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

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Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

Establish like motorways with wholesale demolition.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

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It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Para.10.5

Policy T3, CLT1 Appendix CLT1

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These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which

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O - 16756 - 14229 - Policy T1 - Highways - i, iii

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CHAPTER 10 Policy T1 - Highways

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Core Strategy Submission Document

O - 16756 - 14229 - Policy T1 - Highways - i, iii

16756 Object

CHAPTER 10 Policy T1 - Highways

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Core Strategy Submission Document

O - 16758 - 14229 - Policy T1 - Highways - i, iii

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CHAPTER 10 Policy T1 - Highways

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O - 16758 - 14229 - Policy T1 - Highways - i, iii

16758 Object

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Appear at exam? Not Specified **Soundness Tests** i, iii

Core Strategy Submission Document

S - 16890 - 8329 - Policy T1 - Highways - None

16890 Support

CHAPTER 10 Policy T1 - Highways

Respondent: Swan Hill Homes Limited [8329]

Swan Hill Homes Limited
C/O Agent
Mr P Kneen
Charles Planning

Agent: Charles Planning Associates Ltd (Mr P Kneen) [5040]

Charles Planning Associates Ltd
1644-1645 Parkway
Solent Business Park
Whiteley
Fareham
Hampshire
PO15 7AH
01489 580853

Full Text:

1.0 Instruction and Introduction

1.1 Charles Planning Associates Limited (Chartered Town Planners) is Instructed by Swan Hill Homes Limited (Swan Hill) to prepare and submit representations on their behalf in respect of the Rochford District Local Development Framework: Core Strategy Submission (September 2009) Development Plan Document.

1.2 The comments refer to the relevant sections and policy designations in the Submission document, as appropriate.

1.3 The comments set out in this submission are intended to assist the District Council in taking forward its Local Development Framework. It is our intention to continue to be involved in the LDF preparation process and we look forward to the opportunity to comment further at the Examination to the Core Strategy.

1.4 If you have any queries regarding the content of this submission then please do not hesitate to contact:

Peter Kneen BSc (Hons) MSc MRTPI
Planner

2.0 Housing: Policy H1 - The Efficient Use of Land for Housing

2.1 Swan Hill recognises the importance of seeking to concentrate new developments mainly in the existing urban areas, on previously developed land where possible, particularly in view of the Government seeking to ensure 60% of all such new developments are on previously development land (PDL).

2.2 However, given the character of the District, and the strategic housing requirement of the East of England Plan, Swan Hill supports the approach that the Council must also make provision for additional development on the edge of existing settlements on greenfield sites, particularly in the most sustainable locations. As such, Swan Hill supports that where feasible, the redevelopment of existing employment sites for residential/employment purposes can make a contribution towards the strategic housing requirement, provided that sufficient additional employment land is brought forward to ensure the stability of employment levels in the District, and to ensure employment growth meets the East of England Plan requirements.

2.3 Swan Hill considers that Policy H1 should include consideration that new extensions to existing settlements have regard to their potential impact on the wider characteristics and openness objectives of the Green Belt.

Policy H2 - Extensions to Residential Envelopes and Phasing

2.4 Swan Hill generally supports the approach taken by the Council in this policy. As set out above, Swan Hill consider the Council's acknowledgment that housing requirements should be met through the allocation of land on the edge of the existing settlements is the most suitable way forward to meeting the Council's strategic housing requirement and complies with the advice in PPS3.

2.5 The need for suitable greenfield urban extensions represents the best way forward for the Council to meet its strategic housing requirement, as set out in the East of England Plan. Swan Hill supports the recognition that the potential supply of alternative previously developed sites is limited, without detrimentally affecting the character of the District, and therefore the best way forward is the use of sustainable greenfield urban extensions to the existing settlements of the District.

2.6 However, Swan Hill consider that a fundamental consideration that the District Council should consider relates to the potential impact of the urban extensions on the Green Belt policy has been somewhat overlooked. The wider sustainability credentials of the settlements of the District should only be one of many key considerations for determining the level of expansion. In view of the proximity of Southend-on-Sea to all the main settlements of the District, and the influence this has on the likely location many people would travel for employment and leisure, sustainability of many of the settlements is not a key overarching factor, and greater weight should be placed on the potential impact on the openness of the Green Belt, as this cannot be remedied if development occurs in the wrong location.

2.7 As such, Swan Hill considers that determining the location of growth for the main settlements should be to identify

Core Strategy Submission Document

S - 16890 - 8329 - Policy T1 - Highways - None

16890 Support

CHAPTER 10 Policy T1 - Highways

those locations where the impact on the wider setting of the Green Belt can be minimised. Further justification for those general locations chosen should be identified in Policy H2. In this regard, Swan Hill has serious concerns regarding the removal of Land South West of Great Wakering as a viable option for the growth of the settlement. The development of this area of Great Wakering, in addition to the potential redevelopment of the Star Lane Industrial Estate could provide a more comprehensive development, whilst ensuring that the wider openness of the Green Belt is maintained. Land South West of Great Wakering is significantly better placed to limit the impact on the wider Green Belt than Land West of Great Wakering, and could contribute to the provision of an important amenity and wildlife site for the local community.

2.8 In addition, Swan Hill consider that the Council now has no reserve provision in the event that any of the existing employment sites set out in Policy H1 fail to come forward for development within the envisaged timescale. Further, Land West of Great Wakering has not been identified in the SHLAA as a deliverable site to help meet the strategic housing requirement, contrary to the requirement set out in PPS3.

2.9 As such, Swan Hill would support the provision of suitable sites which could be safeguarded for future development in the likelihood of a shortfall in supply.

Policy H3 - Extensions to Residential Envelopes Post 2021

2.10 As set out above, Swan Hill supports the overall approach the Council has taken towards the provision of sustainable urban extensions as a suitable means of meeting their strategic housing requirement. However, as set out for Policy H2 above, Swan Hill has serious concerns regarding the removal of several proposed sites set out in the October 2008 Preferred Options Core Strategy, without any guarantee of the ability to deliver those sites set out in Policy H1.

2.11 As also considered above, the inclusion of West of Great Wakering for 250 dwellings should not be included ahead of South West of Great Wakering, in view of the fact that the site is not identified in the SHLAA as available, suitable and achievable as required by PPS3, and thus is not supported by a robust and creditable evidence base for its inclusion as a strategic site for development.

2.12 Whilst Swan Hill acknowledge that alterations to Policy H1 has resulted in the removal of some locations for growth in Policy H3 (as set out in the Sustainability Appraisal), Swan Hill does not consider that the most appropriate locations have been chosen.

2.13 In addition to the matters raised above, the use of West of Great Wakering would also result in the loss of valuable agricultural land, which clearly in a Green Belt location, should be less suitable for development than other sites, such as South West of Great Wakering, which would have limited impact on the wider Green Belt policy, and not result in the loss of valuable agricultural land.

2.14 Finally, in respect of Policies H1, H2 and H3, all of the above comments are based on our interpretation of the Submission Version Core Strategy when compared to the October 2008 Version of the Core Strategy. Without the ability to undertake a detailed assessment of the Council's SHLAA, it is not possible to clarify the proposed Core Strategy position regarding the proposed direction of growth proposed for the settlements in the District. As such, Swan Hill reserves the right to make additional representations regarding the proposed Policies H1, H2 and H3 following the publication of the SHLAA in due course.

Policy H4 - Affordable Housing

2.15 In general terms, Swan Hill supports the approach taken by the Council towards the provision of affordable housing for new residential developments. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H5 - Dwelling Types

2.16 Swan Hill supports the policy provision of H5, and considers that the approach taken by the Council for this policy represents a suitably flexible alternative to stipulating percentages of dwelling mix, sought by some local authorities. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H6 - Lifetime Homes

2.17 In regard to this policy, Swan Hill objects to the Council's policy where all new dwellings should be provided to the Lifetime Homes Standard. Whilst it is acknowledged that the UK has an aging population, Swan Hill considers that seeking to provide Lifetime Homes on all sites is considered to be overly onerous for proposed developers, particularly when considering the requirement for all car parking spaces to be suitable for disabled users, which could result in more schemes becoming unviable. Therefore, the provision of a percentage of Lifetime Homes should be considered through negotiations with the Council at the planning application stage, and should be determined on a case-by-case basis.

3.0 Character of Place: Policy CP1 - Design

16890 Support

CHAPTER 10 Policy T1 - Highways

3.1 The Town and Country Planning (General Development Procedure) Order 1995 (As Amended) makes the submission of a Design and Access Statement for most types of planning applications a Statutory requirement, and as such, the provision of a Design Brief represents a pre-requisite of all major planning applications.

3.2 Policy CP1 seeks to ensure the provision of good, high quality developments that reflect local characteristics and distinctiveness, this ideology is supported by Swan Hill.

4.0 The Green Belt:
Policy GB1 - Green Belt Protection

4.1 Following the amendments to the wording of the Policy since the October 2008 Preferred Options Core Strategy, Swan Hill is now generally supportive of Policy GB1 and its supporting text. However, as expressed above, it is important that where alterations to the Green Belt boundary occur as a result of the extension of the settlements to meet the strategic housing requirement, both the minimal amount of land is taken and where that land is taken for development, it represents the best available land which has a minimal impact of the wider openness characteristic of the Green Belt.

5.0 Environmental Issues:
Policy ENV3 - Flood Risk

5.1 Swan Hill generally supports the approach set out in Policy ENV3 regarding ensuring development accords with the sequential test of PPS25. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV4 - Sustainable Drainage Systems (SUDS)

5.2 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV4. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV8 - On-site Renewable and Low Carbon Energy Generation

5.3 Whilst Swan Hill recognises the importance of reducing carbon emissions, particularly in new housing developments, and the role this can play in reducing the nations overall Greenhouse emissions. As such Swan Hill is generally supportive of Policy ENV8. It is noted that Policy ENG1 of the East of England Plan sets out a threshold of developments comprising 10 or more dwellings. Swan Hill consider it important for the District Council to justify the reduction in the threshold level.

5.4 Further, no assessment of Policy ENV8 has been set out in the Sustainability Appraisal which justifies the change in threshold from that of Policy ENG1 of the RSS.

Policy ENV9 - Code for Sustainable Homes

5.5 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV9. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

6.0 Community Infrastructure, Leisure and Tourism:
Policy CLT1 - Planning Obligations and Standard Charges

6.1 Swan Hill generally supports the overall approach the Council has taken in Policy CLT1. It is considered Policy CLT1 sets out a degree of flexibility to ensure that all sites are considered on a site-by-site basis, assessing the individual merits of each planning application, in order to ensure the levels of contributions applicable meet the five tests of Circular 05/05. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policies CLT5 - Open Space;
CLT7 - Play Space;
CLT8 - Youth Facilities; and,
CLT10 - Playing Pitches

6.2 Swan Hill supports the need for new residential developments to incorporate a degree of new publicly accessible open space, children's play space, youth facilities and playing pitches, and as such, generally supports the policy approaches taken by the Council.

6.3 However, it is important that whilst the Council may seek to undertake an assessment of providing standard charges for new development, which, as set out in Policy CLT1, this should be based on thorough public consultation and consideration and sound justification. Swan Hill consider that within the provision of a standard charge, it is important that such provision allows for a degree of flexibility to ensure that each site is assessed individually and on its own merits. This is particularly important for those sites close to existing open spaces and facilities. As such, the levels of

16890 Support

CHAPTER 10 Policy T1 - Highways

open space and recreation facilities required in the 'standard charge' should be based on an up-to-date PPG17 Open Space assessment, which should be used to form a key consideration in the levels of provision likely to be required in the standard charge system proposed.

7.0 Transport: Policy T1 - Highways

7.1 Swan Hill supports the overall objectives set out in Policy T1 requiring developments to be located and designed to reduce the reliance on the private car and to meet the infrastructure needs generated by development or seek to help achieve these needs is acceptable in principle.

7.2 Swan Hill recognises the importance of providing sufficient infrastructure provision to meet the requirements of development, and that where developments have insufficient consideration of impact on existing infrastructure, they should be considered unacceptable and contrary to National policy guidance. However, Swan Hill considers it important to emphasise that the developer's role should not be seen as a means to meet existing shortfalls in provision.

Policy T3 - Public Transport

7.3 Swan Hill is generally supportive of the policy approach set out in T3, however, as set out in paragraph 7.2 above, it is important that the District Council do not consider that it is the developer's responsibility to resolve existing shortfalls in provision of public transport, and any contribution towards additional public transportation provision should only be to mitigate against the additional level of demand likely from the development proposed.

Policy T5 - Cycling and Walking

7.4 Swan Hill supports the general approach to this policy, as Swan Hill recognises the importance of promoting the use of alternatives to the private car. The policy provision acknowledges the need to ensure relevant contributions in the event of additional travel demands generated by individual developments, whilst also setting out additional aspirations for the cycle network in the District.

7.5 As such, Swan Hill considers this policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy T8 - Parking Standards

7.6 The Council has recently (January 2007) adopted SPD on the requirements for parking standards, and as such, Swan Hill generally supports the policy approach chosen by the Council. As set out in the SPD, whilst Swan Hill generally supports the approach taken by the District Council towards setting residential parking standards, in that the Council has recognised that in the suburban areas, even with some access to public transport, the majority of residents will rely on the use of private cars. However, Swan Hill has concerns over the failure of the District Council to comply with the provisions of PPG13: Transport (2001) which sets out that Local Planning Authorities should not set minimum standards for car parking. Whilst it is acknowledged that PPS3 sets out provision for the consideration of local circumstances, it is considered that the Council has not justified this deviation from PPG13's maximum standard.

7.7 Whilst it is acknowledged that such justification may become apparent through the work currently being undertaken by Essex County Council, until such time, the District Council should only seek to apply the maximum standards indicated in PPG13. However, Swan Hill recommends that the District Council make provisions in the wording of the Policy to allow for changes in the event that future policy on car parking standards need to reflect the County standard, following the completion of the County Council review.

8.0 Economic Development: Policies ED3 - Existing Employment Land ED4 - Future Employment Allocations

8.1 In respect of Policies ED3 and ED4, Swan Hill notes that they have changed considerably since the October 2008 Preferred Options document, in that they are site specific regarding the location of the proposed redevelopment of existing employment sites. These four sites are also identified in Policy H1 - Efficient Use of Land, and in general, Swan Hill supports the approach to the redevelopment of these sites (where feasible) based on the assessments of the sites set out in this version of the Core Strategy.

8.2 However, Swan Hill has concerns that these policies might not be considered suitably sound given that insufficient opportunity has been allocated for consultation on their redevelopment. Without the SHLAA being publically available prior to the consultation on this Core Strategy, an insufficient evidence base has been provided to corroborate that these sites are neither suitable or deliverable to meet the test of soundness requirements.

Summary:

Policy T1 - Highways

7.1 Swan Hill supports the overall objectives set out in Policy T1 requiring developments to be located and designed to reduce the reliance on the private car and to meet the infrastructure needs generated by development or seek to help

Core Strategy Submission Document

S - 16890 - 8329 - Policy T1 - Highways - None

16890 Support

CHAPTER 10 Policy T1 - Highways

achieve these needs is acceptable in principle.

7.2 Swan Hill recognises the importance of providing sufficient infrastructure provision to meet the requirements of development, and that where developments have insufficient consideration of impact on existing infrastructure, they should be considered unacceptable and contrary to National policy guidance. However, Swan Hill considers it important to emphasise that the developer's role should not be seen as a means to meet existing shortfalls in provision.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 15707 - 4933 - Policy T2 - Highways Improvements - None

15707 Support

CHAPTER 10 Policy T2 - Highways Improvements

Respondent: Mr & Mrs Cooper [4933]

11 Spencers
Hawkwell
Essex
SS5 4LW

Agent: N/A

Full Text: Agree with proposed improvements but would add requirement for some solution to traffic congestion through Hockley Spa junction. traffic loads much increased since opening of Cherry Orchard Way.
Likely to get more traffic loads if proposed development of land adjacent to Cherry Orchard Way proceeds alongside Airport development.

Summary: Agree with proposed improvements but would add requirement for some solution to traffic congestion through Hockley Spa junction. traffic loads much increased since opening of Cherry Orchard Way.
Likely to get more traffic loads if proposed development of land adjacent to Cherry Orchard Way proceeds alongside Airport development.

Change to Plan N/A

Appear at exam? Not Specified

Soundness Tests N/A

Core Strategy Submission Document

O - 15834 - 4951 - Policy T2 - Highways Improvements - i, ii, iii

15834 Object

CHAPTER 10 Policy T2 - Highways Improvements

Respondent: Hockley Residents Association (Mr B Guyett) [4951] **Agent:** N/A

Hockley Residents Association
2 Tonbridge Road
Hockley
Essex
SS5 5HL

Full Text: The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

Summary: The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

Change to Plan Review whole strategy of scattering houses around the district

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 15836 - 4951 - Policy T2 - Highways Improvements - i, ii, iii

15836 Object

CHAPTER 10 Policy T2 - Highways Improvements

Respondent: Hockley Residents Association (Mr B Guyett) [4951] **Agent:** N/A

Hockley Residents Association
2 Tonbridge Road
Hockley
Essex
SS5 5HL

Full Text: RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Summary: Housing will be scattered across the district but no detailed consideration has been given to the implications for highways. Many roads are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Change to Plan Review policy of scattering houses and industry around the district

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 15863 - 12083 - Policy T2 - Highways Improvements - i

15863 Object

CHAPTER 10 Policy T2 - Highways Improvements

Respondent: Mr Paul Sealey [12083]

Agent: N/A

Kirrin,
Hockley Rise,
Hockley
SS5 4PT
United Kingdom
01702206888

Full Text: The policy stated here is not the same as published in the PDF version or made available through the local library. The PDF version includes improvements Spa Road/Main Road roundabout. There may be other variances between documents. It is important to be clear what the policies are that are being proposed.

Summary: The policy stated here is not the same as published in the PDF version or made available through the local library. The PDF version includes improvements Spa Road/Main Road roundabout. There may be other variances between documents. It is important to be clear what the policies are that are being proposed.

Change to Plan Clarify what policy is being proposed. Check the on-line system and PDF versions to ensure there are no other inconsistencies. At the very least advise anyone who has commented on the constulation of discrepancies found.

Appear at exam? No

Soundness Tests i

Core Strategy Submission Document

O - 15899 - 11793 - Policy T2 - Highways Improvements - i, ii, iii

15899 Object

CHAPTER 10 Policy T2 - Highways Improvements

Respondent: Mr Brian Guyett [11793]

2 Tonbridge Road,
Hockley
SS55HL
United Kingdom
07736211248

Agent: N/A

Full Text: The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

Summary: The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

Change to Plan REVISE APPROACH

Appear at exam? No

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 15903 - 11793 - Policy T2 - Highways Improvements - i, ii, iii

15903 Object

CHAPTER 10 Policy T2 - Highways Improvements

Respondent: Mr Brian Guyett [11793]

2 Tonbridge Road,
Hockley
SS55HL
United Kingdom
07736211248

Agent: N/A

Full Text: RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound

Summary: RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound

Change to Plan Revise policy

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 15904 - 11793 - Policy T2 - Highways Improvements - i, ii, iii

15904 Object

CHAPTER 10 Policy T2 - Highways Improvements

Respondent: Mr Brian Guyett [11793]

2 Tonbridge Road,
Hockley
SS55HL
United Kingdom
07736211248

Agent: N/A

Full Text: PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Summary: PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Change to Plan Revise policy

Appear at exam? No

Soundness Tests i, ii, iii

Core Strategy Submission Document

S - 15942 - 9032 - Policy T2 - Highways Improvements - None

15942 Support

CHAPTER 10 Policy T2 - Highways Improvements

Respondent: Essex Chambers of Commerce (Mr John Dallaway) **Agent:** N/A
[9032]

Essex Chambers of Commerce
2nd Floor,
Viscount House,
London Southend Airport, Southend-on-Sea.
Essex.
SS2 6YF
01702-560100

Full Text: Support Policy T2 and, recognising that the list is not exhaustive, would consider it essential that improvements to Sutton Road and access to the Purdey's Industrial Estate are a very high priority.

Summary: Support Policy T2 and, recognising that the list is not exhaustive, would consider it essential that improvements to Sutton Road and access to the Purdey's Industrial Estate are a very high priority.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16015 - 10324 - Policy T2 - Highways Improvements - i, ii, iii

16015 Object

CHAPTER 10 Policy T2 - Highways Improvements

Respondent: Mrs Jennifer Abbey [10324]

3 Claybrick Avenue
Hockley
Essex
SS5 4PS
UK
07768 542634

Agent: N/A

Full Text: The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

Summary: The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

Change to Plan Revise approach

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16017 - 10324 - Policy T2 - Highways Improvements - i, ii, iii

16017 Object

CHAPTER 10 Policy T2 - Highways Improvements

Respondent: Mrs Jennifer Abbey [10324]

3 Claybrick Avenue
Hockley
Essex
SS5 4PS
UK
07768 542634

Agent: N/A

Full Text: RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Summary: RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Change to Plan Revise policy

Appear at exam? No

Soundness Tests i, ii, iii

Core Strategy Submission Document

S - 16059 - 14107 - Policy T2 - Highways Improvements - None

16059 Support

CHAPTER 10 Policy T2 - Highways Improvements

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: Are the hopes outlined here realistic? It is a lost cause to try to cut down the use of the private car. Section 106 Agreements would appear unlikely to cover the cost of adequate improvements. If this is not carried out, we will have serious problems with the increase in development planned.

Summary: Are the hopes outlined here realistic? It is a lost cause to try to cut down the use of the private car. Section 106 Agreements would appear unlikely to cover the cost of adequate improvements. If this is not carried out, we will have serious problems with the increase in development planned.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16080 - 7995 - Policy T2 - Highways Improvements - i, ii

16080 Object

CHAPTER 10 Policy T2 - Highways Improvements

Respondent: Mr Alan Stone [7995]

180 Rawreth Lane
Rayleigh
Essex
SS6 9RN
United Kingdom
01268 784031

Agent: N/A

Full Text:

"The Council will work with Essex County Council Highways Authority to ensure that highway improvements are implemented to address issues of congestion".
In this section Ashingdon Road, Rectory Road, Spa Road and Main Road are highlighted as having congestion issues. During the Local Development Framework consultations, residents were invited to submit suggestions to be considered for the Core Strategy Document and I replied with a proposal which would reduce congestion in these areas. My suggestion also included links to Hall Road and the B1013 east to west road network, which also have congested sections.
The proposal was to extend Cherry Orchard Way (adjacent London Southend Airport) northward some 2.5 miles to north Ashingdon linking to points in Hall Road, Rectory Road and Ashingdon Road. By doing this, better access to the A127 would be provided and traffic flows through Ashingdon, Rochford, Hawkwell and Hockley could all be drastically reduced. I even submitted drawings of the proposal to assist explanation.
Unfortunately the response from RDC was very disappointing, their only comment being that it could not be justified as it included passing over a railway line.
I feel that RDC's statement to "address issues of congestion" is unsound because it does not portray the major improvements needed to solve the congestion problems in the whole of the district.
I wish to participate at the oral part of the examination and present my suggestion.

Summary:

During LDF consultations residents were invited to submit suggestions on any matters. I submitted a suggestion to extend Cherry Orchard Way northward. Connected to 3 East/West routes it would reduce congestion through surrounding towns. This was dismissed without even a thank you. Wish to participate during oral part of the examination.

Change to Plan

Include positive suggestions from residents in the submission document in order that the Planning Inspectorate can make an assessment of what is being presented by the public and not just the views of the council.

Appear at exam? Yes

Soundness Tests i, ii

Core Strategy Submission Document

O - 16081 - 10578 - Policy T2 - Highways Improvements - i, ii, iii

16081 Object

CHAPTER 10 Policy T2 - Highways Improvements

Respondent: Maria/Edmund Tugwell [10578]

Agent: N/A

"Woodlands",
39, Wood Avenue,
Hockley,
Essex
SS5 5NU
United Kingdom

Full Text: There is reference to The Spa/Main Road, Ashingdon/Rectory Road junctions, and enhancement of the B1013 as possible traffic improvements (which will be needed if the developments in Hockley and Hawkwell go ahead), but no specific explanation how these will be implemented. Installing traffic lights will not help to cut down tailbacks in rush hour, as shown by those on the Plumberow Ave/Greensward Lane junction - And these are not on the B1013!

Summary: There is reference to The Spa/Main Road, Ashingdon/Rectory Road junctions, and enhancement of the B1013 as possible traffic improvements (which will be needed if the developments in Hockley and Hawkwell go ahead), but no specific explanation how these will be implemented. Installing traffic lights will not help to cut down tailbacks in rush hour, as shown by those on the Plumberow Ave/Greensward Lane junction - And these are not on the B1013!

Change to Plan A) Straighten out and widen existing winding (ex country) roads such as the B1013, or build a bypass for Hockley and Hawkwell. In both cases this is unrealistic economically (properties which have to be compulsory purchased, and where are the displaced residents going to go?), or taking the bypass through open spaces (such as Hockley Woods/Jubilee Park).

B) Discourage people from using cars. One way of doing this is by drastically improving public transport (again, not realistic - Proof of which is the deterioration of Arriva Bus Service 7&8). SERT has been mentioned (Policy T4) as the only specific plan, but it does not touch Hawkwell nor Hockley.

Another way to discourage car use is to improve and build more connecting, properly sign-posted cycle paths and walkways (most existing cycle paths and walkways don't connect with each other and need local knowledge to know that they even exist) that are designed to be used safely by both cyclists and pedestrians (rather than a half-hearted way to get cyclists off the roads), while encouraging the use and sale of bicycles (for example by using the Cycle2Work tax-exempt scheme).

Such a scheme would certainly be necessary to encourage the new residents of the proposed 330 home Housing Estate in Hawkwell to walk/cycle to Hockley Station. At present the most direct route would take them through the grounds of Clements Hall, possibly encountering badly-policed anti-social behaviour (from the types of people who loiter there), and along the main road up a steep hill, making the walk/cycle ride extremely unpleasant. The only specific Greenways mentioned in the document (policy T7) are not planned in Hawkwell, nor Hockley.

Appear at exam? No

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 16159 - 10324 - Policy T2 - Highways Improvements - i, ii, iii

16159 Object

CHAPTER 10 Policy T2 - Highways Improvements

Respondent: Mrs Jennifer Abbey [10324]

3 Claybrick Avenue
Hockley
Essex
SS5 4PS
UK
07768 542634

Agent: N/A

Full Text: PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

Summary: PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Change to Plan Revise policy.

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

16284 Object

CHAPTER 10 Policy T2 - Highways Improvements

Respondent: Mr David Dare [12098]

1, Woodstock Crescent
Hockley Essex
SS5 4XG
UK
01702 205813

Agent: N/A

Full Text: Highway & Traffic Implications

1. Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;

* (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

* EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

3. RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local

16284 Object

CHAPTER 10 Policy T2 - Highways Improvements

Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

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The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

Summary:

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:

* The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

* The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

Previous consultations ignored by RDC:

The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Core Strategy Submission Document

16284 Object

CHAPTER 10 Policy T2 - Highways Improvements

Thus the proposals are not founded on a robust and credible evidence base and are unsound

7. RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

* The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

* the Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!

* The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Summary:

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

the Foundry Industrial Estate has never even been previously mentioned;

The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

9. PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

10. THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food

Core Strategy Submission Document

16284 Object

CHAPTER 10 Policy T2 - Highways Improvements

shopping expenditure.

2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's

existing strengths, rather than retail expansion"

4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Summary:

The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

16286 Object

CHAPTER 10 Policy T2 - Highways Improvements

Respondent: Mr David Dare [12098]

1, Woodstock Crescent
Hockley Essex
SS5 4XG
UK
01702 205813

Agent: N/A

Full Text: Highway & Traffic Implications

1. Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;

* (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

* EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

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3. RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

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16286 Object

CHAPTER 10 Policy T2 - Highways Improvements

Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

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4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

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6. Previous consultations ignored by RDC:

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* The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

Previous consultations ignored by RDC:

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Core Strategy Submission Document

16286 Object

CHAPTER 10 Policy T2 - Highways Improvements

Thus the proposals are not founded on a robust and credible evidence base and are unsound

7. RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

* The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

* the Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!

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8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

9. PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

10. THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food

Core Strategy Submission Document

16286 Object

CHAPTER 10 Policy T2 - Highways Improvements

shopping expenditure.

2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's

existing strengths, rather than retail expansion"

4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moveover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace".

Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

16302 Object

CHAPTER 10 Policy T2 - Highways Improvements

Respondent: Mr D Himsley [14206]

4 Brackendale Close
Hockley
Essex
SS5 5AP

Agent: N/A

Full Text: Please find the following objections: -

10 off Unsound Reasons.
1. Highway and Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

3. RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

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The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:
The Hockley Parish Plan (dated 2007). The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

7. RDC not consulted on proposals to relocate the Eldon Way and Foundry Industrial Estates

EW; CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" absolutely no consultation on concept of moving EW businesses entirely

FIE; has never even been previously mentioned in any plan version; CS states omission was due to typing error!

Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus proposals are not founded on a robust and credible evidence base and are unsound.

8. The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

Core Strategy Submission Document

16302 Object

CHAPTER 10 Policy T2 - Highways Improvements

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound

9. PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies"

Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which

does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise

residents how such changes will be made and the strategy is unsound.

10. The CS misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The CS states "The R&LS states Hockley has great potential and has a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) "does not lend itself to a food store capable of retaining a significant proportion of main food shopping expenditure.
- 2) "there is no immediate capacity for additional floor space."
- 3) "recommend that focus be maintained on developing Hockley's existing strengths."
- 4) " the Council may wish to consider reclassifying Hockley from a town center, to a district center".

Summary:

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

16304 Object

CHAPTER 10 Policy T2 - Highways Improvements

Respondent: Mr D Himsley [14206]

4 Brackendale Close
Hockley
Essex
SS5 5AP

Agent: N/A

Full Text: Please find the following objections: -

10 off Unsound Reasons.

1. Highway and Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

3. RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:

The Hockley Parish Plan (dated 2007). The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

7. RDC not consulted on proposals to relocate the Eldon Way and Foundry Industrial Estates

EW; CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" absolutely no consultation on concept of moving EW businesses entirely

FIE; has never even been previously mentioned in any plan version; CS states omission was due to typing error!

Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus proposals are not founded on a robust and credible evidence base and are unsound.

8. The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

Core Strategy Submission Document

16304 Object

CHAPTER 10 Policy T2 - Highways Improvements

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound

9. PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies"

Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which

does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise

residents how such changes will be made and the strategy is unsound.

10. The CS misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The CS states "The R&LS states Hockley has great potential and has a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) "does not lend itself to a food store capable of retaining a significant proportion of main food shopping expenditure.

2) "there is no immediate capacity for additional floor space."

3) "recommend that focus be maintained on developing Hockley's existing strengths."

4) " the Council may wish to consider reclassifying Hockley from a town center, to a district center".

Summary:

3. RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

16434 Object

CHAPTER 10 Policy T2 - Highways Improvements

Respondent: Joan and Phil Smith [13749]

46 Woodpond Avenue
Hockley
Essex
SS5 4PX

Agent: N/A

Full Text: Re: Core Strategy for Hockley Redevelopment

I object to the Core Strategy for the following reasons;

You are ignoring the views of the local residents, who have overwhelmingly stated via the Hockley Parish Plan that they do not want any large-scale housing development in Hockley, but if there has to be some additional housing, there must be no loss of greenbelt or open spaces and any developments must be matched by the appropriate levels of infrastructure.

Our village needs improvements to build on what we have now rather than a long drawn out proposal, which, by the time it is agreed and completed will have seen Hockley become just a huge housing estate without a thriving centre, because many local businesses will have disappeared due to the dreadfully inadequate transport links.

Our roads simply cannot cope with the existing traffic volumes let alone the massive increase in traffic, which will result from the relocation of businesses and numerous housing developments.

Our village is surrounded by some of the most beautiful countryside in the district which we do not want to see disappear forever.

Listed below are some of the technical points as to why I object to the Core Strategy and why I believe it to be inaccurate, misleading and unsound.

By proposing to move employment at Hockley's two business estates to a green field site near the airport, which has no existing public transport links and being 2-3 miles from the nearest railway station, is contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions by placing a reliance on car transport as a means of getting to work.

Though RDC are proposing to upgrade the nearest road to a dual carriageway, the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway. This road is already horrendously busy and virtually grid locked at peak times, so this is quite unbelievable that with the predicted expansion of the airport and new industrial estate, there is no provision for the improvement of the B1013 through Hockley. The proposed development of the business estates for housing (and additional housing proposed for Hawkwell) also means an increase in the volume of traffic in the Hockley area with no provision for improvement or expansion to cope with the higher volume.

The site selected for the new industrial estate contravenes PPS4, which states that for "out-of-centre sites, preference is given to sites which are or will be well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car and which are close to the centre and have a high likelihood of forming links with the centre. As there is no existing public transport, there is no obvious likelihood of forming links with any existing centres. In addition, because of its remote location, accessed by the narrow, busy B1013; it is not suitable for access by cycle or on foot.

It also contravenes PPS1, which states reducing the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

PPS12 4.9 states the infrastructure planning process should identify, as far as possible: infrastructure needs and costs. Neither needs nor, especially, costs have been identified. The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

16434 Object

CHAPTER 10 Policy T2 - Highways Improvements

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned. No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation. Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. There no cross-referencing between concurrent plans affecting the exact same piece of land.

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent, which HAAP will need to follow, and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. It states "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floor space".

What the R&LS actually states is:

- 1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.
- 2) (10.28) "There is no immediate capacity for additional floor space."
- 3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion"
- 4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Invest in what we already have rather than forcing upon us something none of us have asked for. Most people would agree that Hockley needs a facelift but it does not need changing beyond all recognition. This strategy does not propose to deal with the issues that affect this area now, and does not propose to deal with these same issues that will be exacerbated further by the proposals that are being made. Attached are some ideas for relatively quickly achievable solutions, which would enhance the village and deal with some of the traffic problems, without losing "Hockley". We live here because we like it - if we didn't we would have moved!

Make the Spa Pub the roundabout, which would greatly reduce the junction exit combinations that exist at the current mini roundabout.

Traffic will still be able to flow when the brewery lorry parks up - it is very dangerous trying to manoeuvre round it onto that mini roundabout, as you cannot see vehicles coming the other way.

Core Strategy Submission Document

O - 16434 - 13749 - Policy T2 - Highways Improvements - ii

16434 Object

CHAPTER 10 Policy T2 - Highways Improvements

Hockley Ideas:

Demolish the "Alldays" building and use that space to create the "village square", which could be landscaped or used in the way the Rayleigh Market car park is used - farmers markets, market days, parking on non market days. This would maintain the existing focal point of Hockley, the High Street, therefore not being detrimental to the shops on the other side of the road. It would also provide a possible link to the Leisure facilities in Eldon Way.

Summary:

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned. No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

Change to Plan

Appear at exam? Not Specified

Soundness Tests ii

Core Strategy Submission Document

O - 16440 - 14218 - Policy T2 - Highways Improvements - i

16440 Object

CHAPTER 10 Policy T2 - Highways Improvements

Respondent: Barbara Havey [14218]

71 Main Road
Hockley
Essex
SS5 4RG

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.
â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound
RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is

16440 Object

CHAPTER 10 Policy T2 - Highways Improvements

also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

Summary:

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

Previous consultations ignored by RDC:

â€¢ The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

â€¢ The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

Previous consultations ignored by RDC:

The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates
â€¢ The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely
â€¢ the Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!
â€¢ The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Summary:

Core Strategy Submission Document

16440 Object

CHAPTER 10 Policy T2 - Highways Improvements

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates
â€¢ The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely
â€¢ the Foundry Industrial Estate has never even been previously mentioned;
â€¢ The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.
 - 2) (10.28) "There is no immediate capacity for additional floor space."
 - 3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion"
 - 4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".
- The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Summary:

The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Core Strategy Submission Document

16440 Object

CHAPTER 10 Policy T2 - Highways Improvements

Thus the proposals are not founded on a robust and credible evidence base and are unsound

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

16442 Object

CHAPTER 10 Policy T2 - Highways Improvements

Respondent: Barbara Havey [14218]

71 Main Road
Hockley
Essex
SS5 4RG

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.
â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound
RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is

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CHAPTER 10 Policy T2 - Highways Improvements

also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Summary:

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PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

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SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

Previous consultations ignored by RDC:

â€¢ The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

â€¢ The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

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Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates
â€¢ The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely
â€¢ the Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!
â€¢ The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

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Summary:

Core Strategy Submission Document

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CHAPTER 10 Policy T2 - Highways Improvements

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â€¢ The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely
â€¢ the Foundry Industrial Estate has never even been previously mentioned;
â€¢ The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.
 - 2) (10.28) "There is no immediate capacity for additional floor space."
 - 3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion"
 - 4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".
- The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Summary:

Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

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O - 16442 - 14218 - Policy T2 - Highways Improvements - i

16442 Object

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It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16487 - 9646 - Policy T2 - Highways Improvements - i

16487 Object

CHAPTER 10 Policy T2 - Highways Improvements

Respondent: Mrs Margaret Christian [9646]

41 Westminster Drive
Hockley
Essex
SS5 4XD
01702 204320

Agent: N/A

Full Text: Please find enclosed my objection to the Core Strategy Submission DPD. Please kindly acknowledge receipt of this objection and duly register it.

Objections to RDC's Core Strategy Submission DPD

Reason Unsound

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus service are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

3. RCD are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

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The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

16487 Object

CHAPTER 10 Policy T2 - Highways Improvements

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4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs not, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. Thus it is unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of address the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:

The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

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Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing HAAP consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy or Hockley Area Action Plan (HAAP) defines its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

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9. PPS12, 4.6, states that Cores Strategies show be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which do not indicate how such applications will be handled and does not comply with

Core Strategy Submission Document

16487 Object

CHAPTER 10 Policy T2 - Highways Improvements

PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

10. The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

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The Core Strategy is inaccurate, misleading and unsound.

Summary:

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

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Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16527 - 13921 - Policy T2 - Highways Improvements - i

16527 Object

CHAPTER 10 Policy T2 - Highways Improvements

Respondent: Ms H Rozga [13921]

56A Aldermans Hill
Hockley
Essex
SS5 4RW

Agent: N/A

Full Text:

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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Summary:

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The Foundry Industrial Estates has never even been previously mentioned in any plan version; A recent amendment to

16527 Object

CHAPTER 10 Policy T2 - Highways Improvements

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The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

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Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.

2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion".

4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6.

Core Strategy Submission Document

O - 16527 - 13921 - Policy T2 - Highways Improvements - i

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CHAPTER 10 Policy T2 - Highways Improvements

Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) "the Council may wish to consider reclassifying Hockley from a town centre to a district centre.

Summary: 2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

16529 Object

CHAPTER 10 Policy T2 - Highways Improvements

Respondent: Ms H Rozga [13921]

56A Aldermans Hill
Hockley
Essex
SS5 4RW

Agent: N/A

Full Text:

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus service are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

3. RCD are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

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Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts.

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4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. Thus it is unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of address the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

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The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:

The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

Previous consultations ignored by RDC:

The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

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7. RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates.

The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely.

The Foundry Industrial Estates has never even been previously mentioned in any plan version; A recent amendment to

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the Core Strategy acknowledges this omission was due to a typing error!

The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

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The Foundry Industrial Estate has never even been previously mentioned.

The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate.

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing HAAP consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy or Hockley Area Action Plan (HAAP) defines its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

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9. PPS12, 4.6, states that Cores Strategies show be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which do not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

10. The Core Strategy misrepresent the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.

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Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

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Summary:

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It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

16545 Object

CHAPTER 10 Policy T2 - Highways Improvements

Respondent: G and S Cooke [13667]

56 Aldermans Hill
Hockley
Essex
SS5 4RW

Agent: N/A

Full Text:

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus service are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

Summary:

Proposals for moving employment to of town locations, at either end of the district, with no existing public transport inks, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

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16545 Object

CHAPTER 10 Policy T2 - Highways Improvements

the Core Strategy can be delivered."

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Summary

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1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.

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CHAPTER 10 Policy T2 - Highways Improvements

2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion".

4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Core Strategy is inaccurate, misleading and unsound.

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Summary:

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16547 - 13667 - Policy T2 - Highways Improvements - i

16547 Object

CHAPTER 10 Policy T2 - Highways Improvements

Respondent: G and S Cooke [13667]

56 Aldermans Hill
Hockley
Essex
SS5 4RW

Agent: N/A

Full Text:

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus service are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

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The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

Summary:

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The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in

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the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts.

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4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs not, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. Thus it is unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of address the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

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5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:

The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

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16547 Object

CHAPTER 10 Policy T2 - Highways Improvements

7. RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates.

The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely.

The Foundry Industrial Estates has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy acknowledges this omission was due to a typing error!

The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

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8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing HAAP consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy or Hockley Area Action Plan (HAAP) defines its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

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9. PPS12, 4.6, states that Cores Strategies show be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which do not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

10. The Core Strategy misrepresent the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.

Core Strategy Submission Document

16547 Object

CHAPTER 10 Policy T2 - Highways Improvements

2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion".

4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) "the Council may wish to consider reclassifying Hockley from a town centre to a district centre.

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Change to Plan

Appear at exam? Not Specified

Soundness Tests i

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O - 16578 - 14231 - Policy T2 - Highways Improvements - i

16578 Object

CHAPTER 10 Policy T2 - Highways Improvements

Respondent: Heather Wakefield [14231]

Not provided

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighboring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.
â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

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The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

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16578 Object

CHAPTER 10 Policy T2 - Highways Improvements

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Core Strategy Submission Document

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CHAPTER 10 Policy T2 - Highways Improvements

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Change to Plan

Core Strategy Submission Document

O - 16578 - 14231 - Policy T2 - Highways Improvements - i

16578 Object

CHAPTER 10 Policy T2 - Highways Improvements

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16580 - 14231 - Policy T2 - Highways Improvements - i

16580 Object

CHAPTER 10 Policy T2 - Highways Improvements

Respondent: Heather Wakefield [14231]

Not provided

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

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16580 Object

CHAPTER 10 Policy T2 - Highways Improvements

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Core Strategy Submission Document

16580 Object

CHAPTER 10 Policy T2 - Highways Improvements

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Core Strategy Submission Document

O - 16580 - 14231 - Policy T2 - Highways Improvements - i

16580 Object

CHAPTER 10 Policy T2 - Highways Improvements

Change to Plan

Appear at exam? Not Specified Soundness Tests i

Core Strategy Submission Document

16596 Object

CHAPTER 10 Policy T2 - Highways Improvements

Respondent: Roger Wakefield [14232]

Not provided

SS5 4UX

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighboring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.
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It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

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Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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16596 Object

CHAPTER 10 Policy T2 - Highways Improvements

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PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

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Core Strategy Submission Document

16596 Object

CHAPTER 10 Policy T2 - Highways Improvements

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Change to Plan

Core Strategy Submission Document

O - 16596 - 14232 - Policy T2 - Highways Improvements - i

16596 Object

CHAPTER 10 Policy T2 - Highways Improvements

Appear at exam? Not Specified

Soundness Tests i

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Respondent: Roger Wakefield [14232]

Not provided

SS5 4UX

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CHAPTER 10 Policy T2 - Highways Improvements

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Core Strategy Submission Document

16598 Object

CHAPTER 10 Policy T2 - Highways Improvements

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Core Strategy Submission Document

O - 16598 - 14232 - Policy T2 - Highways Improvements - i

16598 Object

CHAPTER 10 Policy T2 - Highways Improvements

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

16713 Object

CHAPTER 10 Policy T2 - Highways Improvements

Respondent: Ms G Yeadell [7834]

6 Southend Road
Hockley
Essex
SS5 4QQ
01702 205450

Agent: N/A

Full Text: Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1

Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2 you discarded N.E.Hockley as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley..along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

Response to C.S Preferred Options 2008 and HAAP 2009

June 2009 issue C S Submission issue says Eldon Way will be used for housing, whereas Sept.2009 issue says "alternative uses, including residential.." to be decided by HAAP (Issues consultation done, Pref.Options issue awaited, but judging from JAAP Pref.Options decision - namely biggest option chosen against overriding opposition, it will be housing).

Need to be logical and even-handed in proposals

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

Establish likely level of Standard Charges. Accept you cannot turn district into motorways with wholesale demolition.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

Para.10.5 "..highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which cannot be altered without much destruction.

Reply to CS Pref. Options 2008 & HAAP Issues/Options 2009

Policy T3, CLT1 Appendix CLT1 Public transport RDC admits this is in the private sector. In Hockley, operator has cut No7 service to 1 per hour from Ashingdon Schools, claiming it is unviable beyond. This is unlikely to change as Hockley is car dependant. No8 bus through Hawkwell is cut to 1 per hour to Rayleigh, for same reason as No7. Proposed planning agreements with developers can't run: eg, a community centre or classroom given by a developer remains once he has moved on - how can that apply for an on-going bus service?

Reply to Infrastructure Transport in CS Pref. Opts. 2008 and to HAAP Issues Opts. 2009.

Ch.11 Economic development

Policy ED3 Core Strategy preferred Options 2008 hinted at possible housing in Eldon Way site. June 2009 Submission version, without consultation, said Eldon Way would be housing (map included Foundry, not the text). September 2009 Submission said redevelopment would be in HAAP (which apart from the Issues/Options version, is unfinished. Judging from results of JAAP Preferred Options where biggest option is chosen, though most respondents were against it, site will be housing, without consultation.

Core Strategy Submission Document

16713 Object

CHAPTER 10 Policy T2 - Highways Improvements

Para.1.25, Para.11.32 Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to accommodate employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

Reply to HAAP Issues Options 2009

Remove compulsory relocation

Policy ED4 Policy states Council will allocate 18ha of land to make up for de-allocations in ED3 - that proves point above.

Proposals for moving employment to out of town locations with no existing transport links are contrary to government policies PPG4, PPS1 and PPS4 and Core Strategy Policy T1.

Evidence Base is ignored by contravening Hockley Parish Plan 2007 and ignoring residents' views on HAAP Issues/Options. Next stage of HAAP Preferred Options is pre-empted and rendered irrelevant. Core Strategy plans to relocate Eldon Way Foundry estate to Greenfield site with no nearby bus or railway. RDC plans to upgrade the nearest road to dual carriageway, though the connecting B1013 (through Hockley) will stay single, said by ECC Highways statistics to be 72% capacity. Airport bosses and council cannot suggest there will be no traffic growth from JAAP and new industrial site.

Reply to Hockley Parish Plan 2007. HAAP Issues 2009

Move to new industrial site near airport contravenes PPS4:

- EC7.3C "out of centre sites, with preference given to sites...well served by choice of...transport and...close to centre and...high likelihood of forming links with centre". There is no current public transport and links with centres is unlikely".

- EC 7.5.1 "whether the site is or will be accessible and well served by choice of transport, public transport, walking and cycling, as well as by car...". Remote location, narrow busy B1013 makes the site unsuitable for access by cycle or on foot.

It also contravenes PPS1 (27vii)... "reduce need to travel, encourage accessible public transport provision to secure more sustainable patterns of transport...Planning should actively manage patterns of urban growth to make fullest use of public transport and focus development in existing centres, near to major public transport interchanges". Core Strategy undermines its own policy Transport and Highways policy T1 and is unsound.

Although shown on accompanying drawing in earlier versions, there was no prior textual mention of Foundry industrial estate (next to Eldon Way) for redevelopment until current CS 2009 Submission. This was stated to be a typing error, but does not inspire confidence in reliability of drafting.

Revise both 2009 Core Strategy and 2009 HAAP Issues/options

Chapter 12: Retail/Town centres

The Core Strategy misrepresents findings of the Retail and Leisure Study 2008.

Para.12.38 The Core Strategy states (para.12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace."

Whereas the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure".

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Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

The Council will work with landowners and its partners to deliver the HAAP.

Remove threat of compulsory purchase orders.

Core Strategy Submission Document

16713 Object

CHAPTER 10 Policy T2 - Highways Improvements

One doesn't perceive impartiality when the Planning Director replies to local HAAP survey with "The affluent people of Hockley are entitled to famous name shops".

Chapter 5: Character of Place and Local Lists

Para.5.4 "Rochford district has unique character..stems from traditional buildings..still dominate towns and villages".

Para.5.17 "Council believes many buildings..are of local distinctiveness..part of..cherished local scene".

This only applies to favoured places: Rochford, Rayleigh, greenbelt villages. Many Hockley conservable items have been systemically removed for supposedly lucrative development in face of widespread protect. This is for supposed need for housing. In fact heritage items have been replaced by dwellings most cannot afford, and/or are hard to sell due to unsuitability of massing and siting. Many other homes are jeopardised by this practice.

HAAP issues 2009. Core Strategy 2006, 2007,2008, SCI.2006

Fewer 'vested interests', more even handedness. No more pressing people out of businesses, homes for expediency.

A CPRE Fieldwork issue extolled Local Lists, citing refusal of 16 flats to replace character house, not on local list. Inspector said house, facade made a contribution to area character, even if English heritage decided it didn't warrant listing. Council worked to get the house grade listed and even made adjacent area conservation one.

Hockley had one such on a "significant site" faced with 13 flats. Ward Member omitted house from refusal proposal, so house could be demolished. RDC dropped Local List ahead of appeal: "Government frowned on such Lists" (Other LAs, unaware of supposed directive retained theirs. After demolition RDC restored Local Lists, saying Government now support them. When Inspector queried the complaint, the then policy officer said "just politics, lot of local interest, nothing of character in the area[!]. (A dozen such items had been removed). Some "distinctive" Hockley buildings are still condemned (in Greensward Lane.; others threatened (Spa Road). Whereas a modest hue and cry in Rayleigh will usually result in a building being saved.

Conclusion

Core Strategy Submission DPD is basically unsound in many respects

Incomplete information. Amongst others, it refers to Hockley AAP, the first stage of which is complete, but not other three. Rochford AAP first stage has been published in arrears of Core Strategy Submission. Rayleigh AAP is still awaited. Precise housing sites are absent, as Urban Capacity Study 2007 has been superseded by Strategic Housing Land Availability Assessment, not yet published. Traders, residents, are thus responding to Core Strategy Submission with incomplete information.

Lack of community involvement. Chapter 1, Introduction, para. 1.11 "Community involvement is an essential part of the plan making process".

In Statement of Community Involvement 2006 Rochford RDC "recognises need to enable people to have their voices heard".

Re Public Meetings: "Consideration will be had to timing and venue to ensure meeting is as accessible as possible".

Take Hockley Area Action Plan as an example of the opposite of all this:- Presentation of document was at Hullbridge, 7.30pm. It was also discussed with JAAP at Rochford Freight House (for traders only) at 7am, without publicity. Excuse made: HAAP on RDC website, which none will seek unless knowing it is there. Rochford District Matters newsheet had minute articles on p.3, half way through consultation period. Another excuse: a 2nd presentation by Hockley Residents Association with planning officer present: only because of complaints, and it is not the HRA's responsibility to RDC's job. Due to unavoidable haste of calling meeting, few knew and only 50 were present.

In Core Strategy Submission Hockley Parish Plan has been ignored. Proposals also ignore 95% rejection rate response to HAAP 2009, which included proposals for Eldon Way employment site.

Unfettered right of developers to carry on as if Core Strategy didn't exist. In PPS 12, Ch.4.6 states: "Core Strategies should be flexible and able to show how they handle contingencies". Several large planning applications have been submitted proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS 12.

Where are we? Finally, at Chapter 1, Introduction, para. 1.24: "the Core Strategy will have to be reviewed in the event of a new Local Area Agreement, post-2011, setting different priorities". So what purpose does all this work serve? So we have hardly finished this exercise, before it all starts again?

Summary:

Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and

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O - 16713 - 7834 - Policy T2 - Highways Improvements - i

16713 Object

CHAPTER 10 Policy T2 - Highways Improvements

contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

Change to Plan

Establish likely level of Standard Charges. Accept you cannot turn district into motorways with wholesale demolition.

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16745 - 14229 - Policy T2 - Highways Improvements - i, iii

16745 Object

CHAPTER 10 Policy T2 - Highways Improvements

Respondent: Hockley Under Threat (J Abbey) [14229]

Hockley Under Threat
None provided

Agent: N/A

Full Text:

Ch. 4 Housing; Ch.10 Transport, Highways; Ch.11 Economic Development; Ch.12 Retail/town centres; Ch.5 Character of place & Local Lists

Chapter 4: Housing

Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1, Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2

N.E.Hockley was discarded as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley...along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

Need to be logical and even-handed in proposals

June 2009 issue C S Submission issue says Eldon Way will be used for housing, whereas Sept.2009 issue says "alternative uses, including residential.." to be decided by HAAP (Issues consultation done, Pref.Options issue awaited, but judging from JAAP Pref.Options decision - namely biggest option chosen against overriding opposition, it will be housing).

Policy H1, T1 Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG14 & PPS1. it also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths",

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Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Ch.10: Highways and Transport

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Establish like motorways with wholesale demolition.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts.

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Para.10.5

Policy T3, CLT1 Appendix CLT1

T1 & T2 "...highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which

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CHAPTER 10 Policy T2 - Highways Improvements

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CHAPTER 10 Policy T2 - Highways Improvements

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Summary:

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

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O - 16745 - 14229 - Policy T2 - Highways Improvements - i, iii

16745 Object

CHAPTER 10 Policy T2 - Highways Improvements

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Change to Plan Establish like motorways with wholesale demolition.

Appear at exam? Not Specified **Soundness Tests** i, iii

Core Strategy Submission Document

O - 16751 - 14229 - Policy T2 - Highways Improvements - i, iii

16751 Object

CHAPTER 10 Policy T2 - Highways Improvements

Respondent: Hockley Under Threat (J Abbey) [14229]

Hockley Under Threat
None provided

Agent: N/A

Full Text: Ch. 4 Housing; Ch.10 Transport, Highways; Ch.11 Economic Development; Ch.12 Retail/town centres; Ch.5 Character of place & Local Lists

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Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

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Hockley-re Eldon Way/Foundry

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Incomplete information. Amongst others, it refers to Hockley AAP, the first stage of which is complete, but not other three. Rochford AAP first stage has been published in arrears of Core Strategy Submission. Rayleigh AAP is still awaited. Precise housing sites are absent, as Urban Capacity Study 2007 has been superseded by Strategic Housing Land Availability Assessment, not yet published. Traders, residents, are thus responding to Core Strategy Submission with incomplete information.

Lack of community involvement. Chapter 1, Introduction, para. 1.11 "Community involvement is an essential part of the plan making process". In Statement of Community Involvement 2006 Rochford RDC "recognises need to enable people..to have their voices heard".

Re Public Meetings: "Consideration will be had to timing and venue to ensure meeting is as accessible as possible".

Hockley Area Action Plan as an example of the opposite of all this:- Presentation of document was at Hullbridge, 7.30 p.m. It was also discussed with JAAP at Rochford Freight House (for traders only) at 7 a.m., without publicity. Excuse made: HAAP on RDC website, which none will seek unless knowing it is there. Rochford District Matters newssheet had minute articles on p.3, half way through consultation period. Another excuse: a second presentation by Hockley Residents Association with planning officer present: only because of complaints, and it is not the HRA's responsibility to RDC's job. Due to unavoidable haste of calling meeting, few knew and only 50 were present.

In Core Strategy Submission Hockley Parish Plan has been ignored. Proposals also ignore 95% rejection rate response to HAAP 2009, which included proposals for Eldon Way employment site.

Unfettered right of developers to carry on as if Core Strategy didn't exist. In PPS 12, Ch.4.6 states: "Core Strategies should be flexible and able to show how they handle contingencies". Several large planning applications have been submitted proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS 12.

Where are we? Finally, at Chapter 1, Introduction, para. 1.24: "the Core Strategy will have to be reviewed in the event of a new Local Area Agreement, post-2011, setting different priorities". So what purpose does all this work serve? So we have hardly finished this exercise, before it all starts again?

Summary:

Policy T3 CLT1 Appendix CLT1 T1 & T2

Public transport RDC admits this is in the private sector. In Hockley, operator has cut No 7 service to one per hour from Ashingdon Schools, claiming it is unviable beyond. This is unlikely to change as Hockley is car dependant. No 8 bus through Hawkwell is cut to one per hour to Rayleigh, for same reason as No 7. Proposed planning agreements with developers can't run: e.g., a community centre or classroom given by a developer remains once he has moved on - how can that apply for an on-going bus service?

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i, iii

Core Strategy Submission Document

O - 16757 - 14229 - Policy T2 - Highways Improvements - i, iii

16757 Object

CHAPTER 10 Policy T2 - Highways Improvements

Respondent: Hockley Under Threat (J Abbey) [14229]

Hockley Under Threat
None provided

Agent: N/A

Full Text:

Ch. 4 Housing; Ch.10 Transport, Highways; Ch.11 Economic Development; Ch.12 Retail/town centres; Ch.5 Character of place & Local Lists

Chapter 4: Housing

Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1, Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2

N.E.Hockley was discarded as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley...along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

Need to be logical and even-handed in proposals

June 2009 issue C S Submission issue says Eldon Way will be used for housing, whereas Sept.2009 issue says "alternative uses, including residential.." to be decided by HAAP (Issues consultation done, Pref.Options issue awaited, but judging from JAAP Pref.Options decision - namely biggest option chosen against overriding opposition, it will be housing).

Policy H1, T1 Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG14 & PPS1. it also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths",

The Core Strategy also contravenes its own policy T1 and is unsound.

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

Establish like motorways with wholesale demolition.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts.

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Para.10.5

Policy T3, CLT1 Appendix CLT1

T1 & T2 "...highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which

Core Strategy Submission Document

16757 Object

CHAPTER 10 Policy T2 - Highways Improvements

cannot be altered without much destruction.

Public transport RDC admits this is in the private sector. In Hockley, operator has cut No 7 service to one per hour from Ashingdon Schools, claiming it is unviable beyond. This is unlikely to change as Hockley is car dependant. No 8 bus through Hawkwell is cut to one per hour to Rayleigh, for same reason as No 7. Proposed planning agreements with developers can't run: e.g., a community centre or classroom given by a developer remains once he has moved on - how can that apply for an on-going bus service?

Ch.11 Economic development

Policy ED3 Core Strategy preferred Options 2008 hinted at possible housing in Eldon Way site. June 2009 Submission version, without consultation, said Eldon Way would be housing (map included Foundry, not the text). September 2009 Submission said redevelopment would be in HAAP (which apart from the Issues/Options version, is unfinished. Judging from results of JAAP Preferred Options where biggest option is chosen, though most respondents were against it, site will be housing, without consultation.

Para.1.25 Para.11.32

Policy ED4 T1 & T2 Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to accommodated employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

Remove compulsory relocation

Policy states Council will allocate 18ha of land to make up for de-allocations in ED3 - that proves point above.

Proposals for moving employment to out of town locations with no existing transport links are contrary to government policies PPG4, PPS1 and PPS4 and Core Strategy Policy T1.

Evidence Base is ignored by contravening Hockley Parish Plan 2007 and ignoring residents' views on HAAP Issues/Options. Next stage of HAAP Preferred Options is pre-empted and rendered irrelevant.

Core Strategy plans to relocate Eldon Way Foundry estate to Greenfield site with no nearby bus or railway. RDC plans to upgrade the nearest road to dual carriageway, though the connecting B1013 (through Hockley) will stay single, said by ECC Highways statistics to be 72% capacity. Airport bosses and council cannot suggest there will be no traffic growth from JAAP and new industrial site.

Revise both 2009 Core Strategy and 2009 HAAP Issues/options

Move to new industrial site near airport contravenes PPS4:

EC7.3C "out of centre sites, with preference given to sites..well served by choice of..transport and..close to centre and..high likelihood of forming links with centre". There is no current public transport and links with centres is unlikely".

EC 7.5.1 "whether the site is or will be accessible and well served by choice of transport, public transport, walking and cycling, as well as by car..". Remote location, narrow busy B1013 makes the site unsuitable for access by cycle or on foot.

It also contravenes PPS1 (27vii).. "reduce need to travel, encourage accessible public transport provision to secure more sustainable patterns of transport..Planning should actively manage patterns of urban growth to make fullest use of public transport and focus development in existing centres, near to major public transport interchanges". Core Strategy undermines its own policy Transport and Highways policy T1 and is unsound.

H1 & RTC6 Although shown on accompanying drawing in earlier versions, there was no prior textual mention of Foundry industrial estate (next to Eldon Way) for redevelopment until current CS 2009 Submission. In recent amendment to the CS this was stated to be due to a typing error!

Chapter 12: Retail/Town centres

The Core Strategy misrepresents findings of the Retail and Leisure Study 2008.

Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

Para.12.38 H1 & RTC6 The Core Strategy states (para.12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace."

Whereas the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food

Core Strategy Submission Document

16757 Object

CHAPTER 10 Policy T2 - Highways Improvements

shopping expenditure".

2) (10.28) "There is no immediate capacity for additional floorspace".

3) (10.29) "we recommend focus be maintained on developing Hockley's existing strengths, rather than retail expansion"

4) 10.31 "the current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it has a very small catchment population. Accordingly, the council may wish to consider reclassifying Hockley from a town centre to a district centre".

Remove threat of compulsory purchase orders.

The Council will work with landowners and its partners to deliver the HAAP.

Chapter 5: Character of Place and Local Lists

Para.5.4 "Rochford district has unique character..stems from traditional buildings..still dominate towns and villages".

Para.5.17 "Council believes many buildings..are of local distinctiveness..part of..cherished local scene".

This only appears to apply to certain places: Rochford, Rayleigh, greenbelt villages. Many Hockley conservable items have been systemically removed for supposedly lucrative development in face of widespread protect. This is for supposed need for housing. In fact heritage items have been replaced by dwellings most cannot afford, and/or are hard to sell due to unsuitability of massing and siting. Many other homes are jeopardised by this practice.

Conclusion

Core Strategy Submission DPD is basically unsound in many respects:

Incomplete information. Amongst others, it refers to Hockley AAP, the first stage of which is complete, but not other three. Rochford AAP first stage has been published in arrears of Core Strategy Submission. Rayleigh AAP is still awaited. Precise housing sites are absent, as Urban Capacity Study 2007 has been superseded by Strategic Housing Land Availability Assessment, not yet published. Traders, residents, are thus responding to Core Strategy Submission with incomplete information.

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In Core Strategy Submission Hockley Parish Plan has been ignored. Proposals also ignore 95% rejection rate response to HAAP 2009, which included proposals for Eldon Way employment site.

Unfettered right of developers to carry on as if Core Strategy didn't exist. In PPS 12, Ch.4.6 states: "Core Strategies should be flexible and able to show how they handle contingencies". Several large planning applications have been submitted proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS 12.

Where are we? Finally, at Chapter 1, Introduction, para. 1.24: "the Core Strategy will have to be reviewed in the event of a new Local Area Agreement, post-2011, setting different priorities". So what purpose does all this work serve? So we have hardly finished this exercise, before it all starts again?

Summary:

Policy states Council will allocate 18ha of land to make up for de-allocations in ED3 - that proves point above.

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Evidence Base is ignored by contravening Hockley Parish Plan 2007 and ignoring residents' views on HAAP Issues/Options. Next stage of HAAP Preferred Options is pre-empted and rendered irrelevant.

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Core Strategy Submission Document

O - 16757 - 14229 - Policy T2 - Highways Improvements - i, iii

16757 Object

CHAPTER 10 Policy T2 - Highways Improvements

Move to new industrial site near airport contravenes PPS4:

EC7.3C "out of centre sites, with preference given to sites..well served by choice of..transport and..close to centre and..high likelihood of forming links with centre". There is no current public transport and links with centres is unlikely".

EC 7.5.1 "whether the site is or will be accessible and well served by choice of transport, public transport, walking and cycling, as well as by car..". Remote location, narrow busy B1013 makes the site unsuitable for access by cycle or on foot.

It also contravenes PPS1 (27vii).. "reduce need to travel, encourage accessible public transport provision to secure more sustainable patterns of transport..Planning should actively manage patterns of urban growth to make fullest use of public transport and focus development in existing centres, near to major public transport interchanges". Core Strategy undermines its own policy Transport and Highways policy T1 and is unsound.

Change to Plan Revise both 2009 Core Strategy and 2009 HAAP Issues/options

Appear at exam? Not Specified **Soundness Tests** i, iii

Core Strategy Submission Document

O - 15901 - 11793 - Public Transport - i, ii, iii

15901 Object

CHAPTER 10 Public Transport

Respondent: Mr Brian Guyett [11793]

2 Tonbridge Road,
Hockley
SS55HL
United Kingdom
07736211248

Agent: N/A

Full Text: SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

Summary: SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

Change to Plan Revise approach

Appear at exam? No

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 15923 - 9936 - Policy T3 - Public Transport - i, iii

15923 Object

CHAPTER 10 Policy T3 - Public Transport

Respondent: Mr David Grew [9936]

PO Box 2091
Hockley
Essex
SS5 4WR
UK
07740201389

Agent: Mr David Grew [9936]

PO Box 2091
Hockley
Essex
SS5 4WR
UK
07740201389

Full Text: This policy says development must be well related to public transport whilst the housing policies propose development in areas poorly served by public transport. Contributions do not overcome the fundamental problems of siting new development in unsustainable locations. They might help fund short term improvements in public transport, but by positioning development at the far extremes of the district it will make services unviable in the long term.

Summary: This policy says development must be well related to public transport whilst the housing policies propose development in areas poorly served by public transport. Contributions do not overcome the fundamental problems of siting new development in unsustainable locations. They might help fund short term improvements in public transport, but by positioning development at the far extremes of the district it will make services unviable in the long term.

Change to Plan The housing policies need to be amended to conform with the main aim of this policy, which is to site development where it is well related to public transport. If this is the case, any contributions to infrastructure will result in long term benefits.

Appear at exam? No

Soundness Tests i, iii

Core Strategy Submission Document

S - 15956 - 10849 - Policy T3 - Public Transport - None

15956 Support

CHAPTER 10 Policy T3 - Public Transport

Respondent: Canewdon Parish Council (Mrs Kelly Holland)
[10849]
Canewdon Parish Council
33 Rowan Way
Canewdon
Essex
SS4 3PD

Agent: N/A

Full Text: Canewdon does not have a regular bus service. This will need to be addressed.

Summary: Canewdon does not have a regular bus service. This will need to be addressed.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 15997 - 13441 - Policy T3 - Public Transport - None

15997 Support

CHAPTER 10 Policy T3 - Public Transport

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: The intention of the policy is clear however, in its current form, it could be argued that development that is not accessible by public transport must also not be accessible by private car

Summary: The intention of the policy is clear however, in its current form, it could be argued that development that is not accessible by public transport must also not be accessible by private car

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16060 - 14107 - Policy T3 - Public Transport - None

16060 Support

CHAPTER 10 Policy T3 - Public Transport

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: The concept is good but would not appear sustainable. Public transport providers will only operate where there is sufficient demand and revenue. The type of vehicles may change in the future - they may become more "green". Therefore more emphasis should be put on the private car making shorter and less journeys. More adequate parking etc. Attention should be paid to a system of integrated interchange of transport - cars/trains/buses/planes

Summary: The concept is good but would not appear sustainable. Public transport providers will only operate where there is sufficient demand and revenue. The type of vehicles may change in the future - they may become more "green". Therefore more emphasis should be put on the private car making shorter and less journeys. More adequate parking etc. Attention should be paid to a system of integrated interchange of transport - cars/trains/buses/planes

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16098 - 7336 - Policy T3 - Public Transport - i

16098 Object

CHAPTER 10 Policy T3 - Public Transport

Respondent: Rayleigh Town Council (Mrs K Cumberland) [7336] **Agent:** N/A

Rayleigh Town Council
The Pavilion
King George V Playing Field
Bull Lane
Rayleigh
Essex
SS6 8JD

01268 741880

Full Text: policy T3 Encouraging alternatives to the use of the private car must not be used as an excuse by developers to lower standards of parking and vehicle storage. This policy is considered to be unsound unless it includes a statement to this effect and is made more prescriptive.

Summary: policy T3 Encouraging alternatives to the use of the private car must not be used as an excuse by developers to lower standards of parking and vehicle storage. This policy is considered to be unsound unless it includes a statement to this effect and is made more prescriptive.

Change to Plan see above

Appear at exam? No **Soundness Tests** i

Core Strategy Submission Document

S - 16237 - 8650 - Policy T3 - Public Transport - None

16237 Support

CHAPTER 10 Policy T3 - Public Transport

Respondent: Countryside Properties (Southern) Ltd (Mr Steve Price) [8650] **Agent:** N/A

Countryside Properties (Southern) Ltd
Countryside House
The Drive
Brentwood
Essex
CM13 3AT
01277260000

Full Text: We agree with the requirement that large scale residential developments will be required to be integrated with public transport and designed in a way that encourages the use of alternative forms of transport to the private car.

However, the scale of any public transport initiatives or requirements (or contributions towards such initiatives) should of course reasonably relate to the impact of the development of the land. Circular 5/05 and the emerging/published DCLG guidance on the use of CIL, makes it clear that new developments/contributions from new development can not be used to resolve existing deficiencies (only, proportionally, those deficiencies made worse by new development).

Summary: The scale of any public transport initiatives or requirements (or contributions towards such initiatives) should of course reasonably relate to the impact of the development of the land. Circular 5/05 and the emerging/published DCLG guidance on the use of CIL, makes it clear that new developments/contributions from new development can not be used to resolve existing deficiencies (only, proportionally, those deficiencies made worse by new development).

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16388 - 8267 - Policy T3 - Public Transport - None

16388 Support

CHAPTER 10 Policy T3 - Public Transport

Respondent: Aber Ltd [8267]

Aber Ltd
C/o Agent

Agent: Colliers CRE (Mr S Chapman) [8266]

Colliers CRE
9 Marylebone Lane
London
W1U 1HL
020 7344 6533

Full Text: Developments should be well related to public transport, and/or accessible by means other than the private car, in order to encourage the use of public transport, together with cycling and walking.

Summary: Developments should be well related to public transport, and/or accessible by means other than the private car, in order to encourage the use of public transport, together with cycling and walking.

Change to Plan N/A

Appear at exam? No **Soundness Tests** N/A

Core Strategy Submission Document

O - 16715 - 7834 - Policy T3 - Public Transport - i

16715 Object

CHAPTER 10 Policy T3 - Public Transport

Respondent: Ms G Yeadell [7834]

6 Southend Road
Hockley
Essex
SS5 4QQ
01702 205450

Agent: N/A

Full Text: Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1

Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2 you discarded N.E.Hockley as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley..along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

Response to C.S Preferred Options 2008 and HAAP 2009

June 2009 issue C S Submission issue says Eldon Way will be used for housing, whereas Sept.2009 issue says "alternative uses, including residential.." to be decided by HAAP (Issues consultation done, Pref.Options issue awaited, but judging from JAAP Pref.Options decision - namely biggest option chosen against overriding opposition, it will be housing).

Need to be logical and even-handed in proposals

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

Establish likely level of Standard Charges. Accept you cannot turn district into motorways with wholesale demolition.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

Para.10.5 "..highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which cannot be altered without much destruction.

Reply to CS Pref. Options 2008 & HAAP Issues/Options 2009

Policy T3, CLT1 Appendix CLT1 Public transport RDC admits this is in the private sector. In Hockley, operator has cut No7 service to 1 per hour from Ashingdon Schools, claiming it is unviable beyond. This is unlikely to change as Hockley is car dependant. No8 bus through Hawkwell is cut to 1 per hour to Rayleigh, for same reason as No7. Proposed planning agreements with developers can't run: eg, a community centre or classroom given by a developer remains once he has moved on - how can that apply for an on-going bus service?

Reply to Infrastructure Transport in CS Pref. Opts. 2008 and to HAAP Issues Opts. 2009.

Ch.11 Economic development

Policy ED3 Core Strategy preferred Options 2008 hinted at possible housing in Eldon Way site. June 2009 Submission version, without consultation, said Eldon Way would be housing (map included Foundry, not the text). September 2009 Submission said redevelopment would be in HAAP (which apart from the Issues/Options version, is unfinished. Judging from results of JAAP Preferred Options where biggest option is chosen, though most respondents were against it, site will be housing, without consultation.

Core Strategy Submission Document

O - 16715 - 7834 - Policy T3 - Public Transport - i

16715 Object

CHAPTER 10 Policy T3 - Public Transport

Para.1.25, Para.11.32 Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to accommodated employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

Reply to HAAP Issues Options 2009

Remove compulsory relocation

Policy ED4 Policy states Council will allocate 18ha of land to make up for de-allocations in ED3 - that proves point above.

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Reply to Hockley Parish Plan 2007. HAAP Issues 2009

Move to new industrial site near airport contravenes PPS4:

- EC7.3C "out of centre sites, with preference given to sites...well served by choice of...transport and...close to centre and...high likelihood of forming links with centre". There is no current public transport and links with centres is unlikely".

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It also contravenes PPS1 (27vii)... "reduce need to travel, encourage accessible public transport provision to secure more sustainable patterns of transport...Planning should actively manage patterns of urban growth to make fullest use of public transport and focus development in existing centres, near to major public transport interchanges". Core Strategy undermines its own policy Transport and Highways policy T1 and is unsound.

Although shown on accompanying drawing in earlier versions, there was no prior textual mention of Foundry industrial estate (next to Eldon Way) for redevelopment until current CS 2009 Submission. This was stated to be a typing error, but does not inspire confidence in reliability of drafting.

Revise both 2009 Core Strategy and 2009 HAAP Issues/options

Chapter 12: Retail/Town centres

The Core Strategy misrepresents findings of the Retail and Leisure Study 2008.

Para.12.38 The Core Strategy states (para.12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace."

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4) 10.31 "the current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it has a very small catchment population. Accordingly, the council may wish to consider reclassifying Hockley from a town centre to a district centre".

Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

The Council will work with landowners and its partners to deliver the HAAP.

Remove threat of compulsory purchase orders.

Core Strategy Submission Document

16715 Object

CHAPTER 10 Policy T3 - Public Transport

One doesn't perceive impartiality when the Planning Director replies to local HAAP survey with "The affluent people of Hockley are entitled to famous name shops".

Chapter 5: Character of Place and Local Lists

Para.5.4 "Rochford district has unique character..stems from traditional buildings..still dominate towns and villages".

Para.5.17 "Council believes many buildings..are of local distinctiveness..part of..cherished local scene".

This only applies to favoured places: Rochford, Rayleigh, greenbelt villages. Many Hockley conservable items have been systemically removed for supposedly lucrative development in face of widespread protect. This is for supposed need for housing. In fact heritage items have been replaced by dwellings most cannot afford, and/or are hard to sell due to unsuitability of massing and siting. Many other homes are jeopardised by this practice.

HAAP issues 2009. Core Strategy 2006, 2007,2008, SCI.2006

Fewer 'vested interests', more even handedness. No more pressing people out of businesses, homes for expediency.

A CPRE Fieldwork issue extolled Local Lists, citing refusal of 16 flats to replace character house, not on local list. Inspector said house, facade made a contribution to area character, even if English heritage decided it didn't warrant listing. Council worked to get the house grade listed and even made adjacent area conservation one.

Hockley had one such on a "significant site" faced with 13 flats. Ward Member omitted house from refusal proposal, so house could be demolished. RDC dropped Local List ahead of appeal: "Government frowned on such Lists" (Other LAs, unaware of supposed directive retained theirs. After demolition RDC restored Local Lists, saying Government now support them. When Inspector queried the complaint, the then policy officer said "just politics, lot of local interest, nothing of character in the area[!]. (A dozen such items had been removed). Some "distinctive" Hockley buildings are still condemned (in Greensward Lane.; others threatened (Spa Road). Whereas a modest hue and cry in Rayleigh will usually result in a building being saved.

Conclusion

Core Strategy Submission DPD is basically unsound in many respects

Incomplete information. Amongst others, it refers to Hockley AAP, the first stage of which is complete, but not other three. Rochford AAP first stage has been published in arrears of Core Strategy Submission. Rayleigh AAP is still awaited. Precise housing sites are absent, as Urban Capacity Study 2007 has been superseded by Strategic Housing Land Availability Assessment, not yet published. Traders, residents, are thus responding to Core Strategy Submission with incomplete information.

Lack of community involvement. Chapter 1, Introduction, para. 1.11 "Community involvement is an essential part of the plan making process".

In Statement of Community Involvement 2006 Rochford RDC "recognises need to enable people to have their voices heard".

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Take Hockley Area Action Plan as an example of the opposite of all this:- Presentation of document was at Hullbridge, 7.30pm. It was also discussed with JAAP at Rochford Freight House (for traders only) at 7am, without publicity. Excuse made: HAAP on RDC website, which none will seek unless knowing it is there. Rochford District Matters newsheet had minute articles on p.3, half way through consultation period. Another excuse: a 2nd presentation by Hockley Residents Association with planning officer present: only because of complaints, and it is not the HRA's responsibility to RDC's job. Due to unavoidable haste of calling meeting, few knew and only 50 were present.

In Core Strategy Submission Hockley Parish Plan has been ignored. Proposals also ignore 95% rejection rate response to HAAP 2009, which included proposals for Eldon Way employment site.

Unfettered right of developers to carry on as if Core Strategy didn't exist. In PPS 12, Ch.4.6 states: "Core Strategies should be flexible and able to show how they handle contingencies". Several large planning applications have been submitted proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS 12.

Where are we? Finally, at Chapter 1, Introduction, para. 1.24: "the Core Strategy will have to be reviewed in the event of a new Local Area Agreement, post-2011, setting different priorities". So what purpose does all this work serve? So we have hardly finished this exercise, before it all starts again?

Summary:

Policy T3, CLT1 Appendix CLT1 Public transport RDC admits this is in the private sector. In Hockley, operator has cut No7 service to 1 per hour from Ashingdon Schools, claiming it is unviable beyond. This is unlikely to change as Hockley is car dependant. No8 bus through Hawkwell is cut to 1 per hour to Rayleigh, for same reason as No7. Proposed

Core Strategy Submission Document

O - 16715 - 7834 - Policy T3 - Public Transport - i

16715 Object

CHAPTER 10 Policy T3 - Public Transport

planning agreements with developers can't run: eg, a community centre or classroom given by a developer remains once he has moved on - how can that apply for an on-going bus service?

Change to Plan

Appear at exam? Not Specified Soundness Tests i

Core Strategy Submission Document

O - 16728 - 14244 - Policy T3 - Public Transport - i, ii

16728 Object

CHAPTER 10 Policy T3 - Public Transport

Respondent: Highways Agency (Mr C Shaw) [14244]

Highways Agency
2nd Floor
Woodlands
Manton Lane
Bedford
MK41 7LW
01234 796122

Agent: N/A

Full Text:

Thank you for inviting the Highways Agency (HA) to comment on the Rochford Core Strategy (CS) Submission Document and Rochford Area Action plan (AAP) prepared by Rochford District Council

As you are aware the HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's motorway and all-purpose trunk road network, collectively known as the Strategic Road Network (SRN), on behalf of the Secretary of State for Transport.

In spatial planning and development control terms, we have a duty to safeguard the operation of the motorway and trunk road network as set out in the Department for Transport Circular: 02/2007: Planning and the Strategic Road Network. <http://www.dft.gov.uk/pgr/regional/strategy/policy/circular207planningandstrategic>. The circular encourages the HA to work co-operatively with Local Planning Authorities within the framework of the Government's policies for planning, growth areas, regeneration, integrated transport and sustainability. We look to your Council's Local Development Framework to promote strategies, policies and land allocations which would support alternatives to the private car.

In the case of Rochford there are no trunk roads within the District although there are two strategic corridors namely the A13 and A127/A1159 which connect into the M25 motorway network at Junctions 30 and 29 respectively. Sections of these areas are currently heavily congested, particularly during peak periods, and operate under considerable levels of network stress. Therefore it is important to the HA that the impact of major development proposals in the Rochford area is considered within the context of future impact on the M25 and the A13 Trunk Road.

Please see below some general comments regarding the soundness of the CS and SSA from a transport perspective, referring to specific proposed submission policies as necessary. This response has been completed with reference to paragraph 4.52 of PPS12 (2008) PPS12, paragraph 4.52 - To be 'sound' a core strategy should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY.

CORE STRATEGY

Policy GB1 - Green Belt Protection

The HA acknowledges that only the minimum amount of Green Belt land will be allocated to meet the District's housing and employment needs as necessary. However, the HA is concerned that any proposed redevelopment of greenbelt sites could result in development in areas with limited access to sustainable transport modes therefore resulting in higher levels of car usage and subsequent impact on the SRN. Although the HA recognizes that new public transport hubs that would facilitate the use of non-car modes could be developed over time, this process is likely to require very substantial investment.

It is therefore important that an appropriate assessment of infrastructure requirements is performed for development sites on Green Belt land. Funding towards the necessary public transport infrastructure improvements must be sought and secured prior to occupation of any new development on greenbelt land. Furthermore, the occupation of such developments should be phased in line with necessary transport infrastructure. This will help the CS meet the PPS12 requirement that a sound DPD should be 'justified' and 'effective' and hence deliverable.

Policy T1 - Highways

Policy T1 highlights the need to reduce reliance on the private car but also observes that 'some impact on the highway network is inevitable'. In a District with such high levels of private car ownership and a limited public transport network, as stated in paragraph 10.2, it will be important to assess the potential impacts to the highway network and ensure that mitigation measures are proposed and implemented where necessary.

An emphasis should be placed on the provision and improvement of sustainable transport infrastructure, particularly where high trip-generating developments such as offices are proposed. In line with the DfT's Guidance on Transport Assessment (2007) - DfT GTA, paragraph 4.51 - 'The key issue is the need to ensure that development proposals strive to achieve nil detriment ('no worse off') to the strategic network, for the opening year and appropriate horizon year'. This emphasis will assist in mitigating potential increases in private vehicle trips and hence help ensure that there is a nil-detriment effect on the SRN.

Policy T3 - Public Transport

Core Strategy Submission Document

O - 16728 - 14244 - Policy T3 - Public Transport - i, ii

16728 Object

CHAPTER 10 Policy T3 - Public Transport

The recent Planning Inspectorate 'LDF - Learning from Experience' document (September 2009) suggests that a Core Strategy should identify a clear source of funding for infrastructure for at least the first 5 years of the plan - The Planning Inspectorate, LDF: Examining DPDs: Learning from experience, September 2009, Paragraph 22 - 'For at least the first 5 years of the plan it should be clear what infrastructure is required, who is going to fund and provide it and how it is to relate to the rate of development'.. Paragraph 10.15 of the CS highlights the importance of public transport links for new developments and implies that developers may be required to contribute towards public transport provision. However, it is noted that developer contributions cannot be expected to pay for all transport improvements and as such, in line with the recent Planning Inspectorate document outlined above additional sources of funding should be identified. It is recommended that alternative sources of funding for public transport improvements are clearly outlined within the CS to ensure that adequate infrastructure provision is made.

Policy T4 - South Essex Rapid Transit

As mentioned in our response to the Core Strategy Issues and options consultation the HA is supportive of this policy and the need to progress the route through South Essex. This has the potential to reduce the impact on the SRN (A13).

Policy T5 - Travel Plans

The HA welcomes the requirement for a travel plan for developments involving both destination and origin trips. However it is noted that no threshold for employment sites have been specified. Essex County Council requires the production of a workplace travel plan for developments with over 50 employees or where there will be a significant impact on the local road network. To avoid ambiguity for developers, the HA recommends that the Rochford District Core Strategy specifies a similar threshold within Policy T5. This will ensure the Core Strategy is in line with PPG13 paragraph 87 - PPG13 - 'Local authorities are expected to consider setting local targets for the adoption of travel plans by local businesses and other organizations..'

Policy ED2 - London Southend Airport

The HA previously responded to the London Southend and Environs Joint Area Action Plan Preferred Options Document (March 2009). As such, we have not repeated our comments here but instead refer you to our consultation response dated 31 March 2009.

Summary:

Policy T3 - Public Transport

The recent Planning Inspectorate 'LDF - Learning from Experience' document (September 2009) suggests that a Core Strategy should identify a clear source of funding for infrastructure for at least the first 5 years of the plan - The Planning Inspectorate, LDF: Examining DPDs: Learning from experience, September 2009, Paragraph 22 - 'For at least the first 5 years of the plan it should be clear what infrastructure is required, who is going to fund and provide it and how it is to relate to the rate of development'.. Paragraph 10.15 of the CS highlights the importance of public transport links for new developments and implies that developers may be required to contribute towards public transport provision. However, it is noted that developer contributions cannot be expected to pay for all transport improvements and as such, in line with the recent Planning Inspectorate document outlined above additional sources of funding should be identified. It is recommended that alternative sources of funding for public transport improvements are clearly outlined within the CS to ensure that adequate infrastructure provision is made.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i, ii

Core Strategy Submission Document

O - 16747 - 14229 - Policy T3 - Public Transport - i, iii

16747 Object

CHAPTER 10 Policy T3 - Public Transport

Respondent: Hockley Under Threat (J Abbey) [14229]

Hockley Under Threat
None provided

Agent: N/A

Full Text:

Ch. 4 Housing; Ch.10 Transport, Highways; Ch.11 Economic Development; Ch.12 Retail/town centres; Ch.5 Character of place & Local Lists

Chapter 4: Housing

Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1, Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2

N.E.Hockley was discarded as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley...along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

Need to be logical and even-handed in proposals

June 2009 issue C S Submission issue says Eldon Way will be used for housing, whereas Sept.2009 issue says "alternative uses, including residential.." to be decided by HAAP (Issues consultation done, Pref.Options issue awaited, but judging from JAAP Pref.Options decision - namely biggest option chosen against overriding opposition, it will be housing).

Policy H1, T1 Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG14 & PPS1. it also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths",

The Core Strategy also contravenes its own policy T1 and is unsound.

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

Establish like motorways with wholesale demolition.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts.

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Para.10.5

Policy T3, CLT1 Appendix CLT1

T1 & T2 "...highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which

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O - 16747 - 14229 - Policy T3 - Public Transport - i, iii

16747 Object

CHAPTER 10 Policy T3 - Public Transport

cannot be altered without much destruction.

Public transport RDC admits this is in the private sector. In Hockley, operator has cut No 7 service to one per hour from Ashingdon Schools, claiming it is unviable beyond. This is unlikely to change as Hockley is car dependant. No 8 bus through Hawkwell is cut to one per hour to Rayleigh, for same reason as No 7. Proposed planning agreements with developers can't run: e.g., a community centre or classroom given by a developer remains once he has moved on - how can that apply for an on-going bus service?

Ch.11 Economic development

Policy ED3 Core Strategy preferred Options 2008 hinted at possible housing in Eldon Way site. June 2009 Submission version, without consultation, said Eldon Way would be housing (map included Foundry, not the text). September 2009 Submission said redevelopment would be in HAAP (which apart from the Issues/Options version, is unfinished. Judging from results of JAAP Preferred Options where biggest option is chosen, though most respondents were against it, site will be housing, without consultation.

Para.1.25 Para.11.32

Policy ED4 T1 & T2 Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to accommodated employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

Remove compulsory relocation

Policy states Council will allocate 18ha of land to make up for de-allocations in ED3 - that proves point above.

Proposals for moving employment to out of town locations with no existing transport links are contrary to government policies PPG4, PPS1 and PPS4 and Core Strategy Policy T1.

Evidence Base is ignored by contravening Hockley Parish Plan 2007 and ignoring residents' views on HAAP Issues/Options. Next stage of HAAP Preferred Options is pre-empted and rendered irrelevant.

Core Strategy plans to relocate Eldon Way Foundry estate to Greenfield site with no nearby bus or railway. RDC plans to upgrade the nearest road to dual carriageway, though the connecting B1013 (through Hockley) will stay single, said by ECC Highways statistics to be 72% capacity. Airport bosses and council cannot suggest there will be no traffic growth from JAAP and new industrial site.

Revise both 2009 Core Strategy and 2009 HAAP Issues/options

Move to new industrial site near airport contravenes PPS4:

EC7.3C "out of centre sites, with preference given to sites..well served by choice of..transport and..close to centre and..high likelihood of forming links with centre". There is no current public transport and links with centres is unlikely".

EC 7.5.1 "whether the site is or will be accessible and well served by choice of transport, public transport, walking and cycling, as well as by car..". Remote location, narrow busy B1013 makes the site unsuitable for access by cycle or on foot.

It also contravenes PPS1 (27vii).. "reduce need to travel, encourage accessible public transport provision to secure more sustainable patterns of transport..Planning should actively manage patterns of urban growth to make fullest use of public transport and focus development in existing centres, near to major public transport interchanges". Core Strategy undermines its own policy Transport and Highways policy T1 and is unsound.

H1 & RTC6 Although shown on accompanying drawing in earlier versions, there was no prior textual mention of Foundry industrial estate (next to Eldon Way) for redevelopment until current CS 2009 Submission. In recent amendment to the CS this was stated to be due to a typing error!

Chapter 12: Retail/Town centres

The Core Strategy misrepresents findings of the Retail and Leisure Study 2008.

Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

Para.12.38 H1 & RTC6 The Core Strategy states (para.12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace."

Whereas the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food

Core Strategy Submission Document

16747 Object

CHAPTER 10 Policy T3 - Public Transport

shopping expenditure".

2) (10.28) "There is no immediate capacity for additional floorspace".

3) (10.29) "we recommend focus be maintained on developing Hockley's existing strengths, rather than retail expansion"

4) 10.31 "the current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it has a very small catchment population. Accordingly, the council may wish to consider reclassifying Hockley from a town centre to a district centre".

Remove threat of compulsory purchase orders.

The Council will work with landowners and its partners to deliver the HAAP.

Chapter 5: Character of Place and Local Lists

Para.5.4 "Rochford district has unique character..stems from traditional buildings..still dominate towns and villages".

Para.5.17 "Council believes many buildings..are of local distinctiveness..part of..cherished local scene".

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Summary:

Policy T3 CLT1 Appendix CLT1 T1 & T2

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Change to Plan

Appear at exam? Not Specified

Soundness Tests i, iii

Core Strategy Submission Document

S - 16891 - 8329 - Policy T3 - Public Transport - None

16891 Support

CHAPTER 10 Policy T3 - Public Transport

Respondent: Swan Hill Homes Limited [8329]

Swan Hill Homes Limited
C/O Agent
Mr P Kneen
Charles Planning

Agent: Charles Planning Associates Ltd (Mr P Kneen) [5040]

Charles Planning Associates Ltd
1644-1645 Parkway
Solent Business Park
Whiteley
Fareham
Hampshire
PO15 7AH
01489 580853

Full Text:

1.0 Instruction and Introduction

1.1 Charles Planning Associates Limited (Chartered Town Planners) is Instructed by Swan Hill Homes Limited (Swan Hill) to prepare and submit representations on their behalf in respect of the Rochford District Local Development Framework: Core Strategy Submission (September 2009) Development Plan Document.

1.2 The comments refer to the relevant sections and policy designations in the Submission document, as appropriate.

1.3 The comments set out in this submission are intended to assist the District Council in taking forward its Local Development Framework. It is our intention to continue to be involved in the LDF preparation process and we look forward to the opportunity to comment further at the Examination to the Core Strategy.

1.4 If you have any queries regarding the content of this submission then please do not hesitate to contact:

Peter Kneen BSc (Hons) MSc MRTPI
Planner

2.0 Housing:
Policy H1 - The Efficient Use of Land for Housing

2.1 Swan Hill recognises the importance of seeking to concentrate new developments mainly in the existing urban areas, on previously developed land where possible, particularly in view of the Government seeking to ensure 60% of all such new developments are on previously development land (PDL).

2.2 However, given the character of the District, and the strategic housing requirement of the East of England Plan, Swan Hill supports the approach that the Council must also make provision for additional development on the edge of existing settlements on greenfield sites, particularly in the most sustainable locations. As such, Swan Hill supports that where feasible, the redevelopment of existing employment sites for residential/employment purposes can make a contribution towards the strategic housing requirement, provided that sufficient additional employment land is brought forward to ensure the stability of employment levels in the District, and to ensure employment growth meets the East of England Plan requirements.

2.3 Swan Hill considers that Policy H1 should include consideration that new extensions to existing settlements have regard to their potential impact on the wider characteristics and openness objectives of the Green Belt.

Policy H2 - Extensions to Residential Envelopes and Phasing

2.4 Swan Hill generally supports the approach taken by the Council in this policy. As set out above, Swan Hill consider the Council's acknowledgment that housing requirements should be met through the allocation of land on the edge of the existing settlements is the most suitable way forward to meeting the Council's strategic housing requirement and complies with the advice in PPS3.

2.5 The need for suitable greenfield urban extensions represents the best way forward for the Council to meet its strategic housing requirement, as set out in the East of England Plan. Swan Hill supports the recognition that the potential supply of alternative previously developed sites is limited, without detrimentally affecting the character of the District, and therefore the best way forward is the use of sustainable greenfield urban extensions to the existing settlements of the District.

2.6 However, Swan Hill consider that a fundamental consideration that the District Council should consider relates to the potential impact of the urban extensions on the Green Belt policy has been somewhat overlooked. The wider sustainability credentials of the settlements of the District should only be one of many key considerations for determining the level of expansion. In view of the proximity of Southend-on-Sea to all the main settlements of the District, and the influence this has on the likely location many people would travel for employment and leisure, sustainability of many of the settlements is not a key overarching factor, and greater weight should be placed on the potential impact on the openness of the Green Belt, as this cannot be remedied if development occurs in the wrong location.

2.7 As such, Swan Hill considers that determining the location of growth for the main settlements should be to identify

Core Strategy Submission Document

S - 16891 - 8329 - Policy T3 - Public Transport - None

16891 Support

CHAPTER 10 Policy T3 - Public Transport

those locations where the impact on the wider setting of the Green Belt can be minimised. Further justification for those general locations chosen should be identified in Policy H2. In this regard, Swan Hill has serious concerns regarding the removal of Land South West of Great Wakering as a viable option for the growth of the settlement. The development of this area of Great Wakering, in addition to the potential redevelopment of the Star Lane Industrial Estate could provide a more comprehensive development, whilst ensuring that the wider openness of the Green Belt is maintained. Land South West of Great Wakering is significantly better placed to limit the impact on the wider Green Belt than Land West of Great Wakering, and could contribute to the provision of an important amenity and wildlife site for the local community.

2.8 In addition, Swan Hill consider that the Council now has no reserve provision in the event that any of the existing employment sites set out in Policy H1 fail to come forward for development within the envisaged timescale. Further, Land West of Great Wakering has not been identified in the SHLAA as a deliverable site to help meet the strategic housing requirement, contrary to the requirement set out in PPS3.

2.9 As such, Swan Hill would support the provision of suitable sites which could be safeguarded for future development in the likelihood of a shortfall in supply.

Policy H3 - Extensions to Residential Envelopes Post 2021

2.10 As set out above, Swan Hill supports the overall approach the Council has taken towards the provision of sustainable urban extensions as a suitable means of meeting their strategic housing requirement. However, as set out for Policy H2 above, Swan Hill has serious concerns regarding the removal of several proposed sites set out in the October 2008 Preferred Options Core Strategy, without any guarantee of the ability to deliver those sites set out in Policy H1.

2.11 As also considered above, the inclusion of West of Great Wakering for 250 dwellings should not be included ahead of South West of Great Wakering, in view of the fact that the site is not identified in the SHLAA as available, suitable and achievable as required by PPS3, and thus is not supported by a robust and creditable evidence base for its inclusion as a strategic site for development.

2.12 Whilst Swan Hill acknowledge that alterations to Policy H1 has resulted in the removal of some locations for growth in Policy H3 (as set out in the Sustainability Appraisal), Swan Hill does not consider that the most appropriate locations have been chosen.

2.13 In addition to the matters raised above, the use of West of Great Wakering would also result in the loss of valuable agricultural land, which clearly in a Green Belt location, should be less suitable for development than other sites, such as South West of Great Wakering, which would have limited impact on the wider Green Belt policy, and not result in the loss of valuable agricultural land.

2.14 Finally, in respect of Policies H1, H2 and H3, all of the above comments are based on our interpretation of the Submission Version Core Strategy when compared to the October 2008 Version of the Core Strategy. Without the ability to undertake a detailed assessment of the Council's SHLAA, it is not possible to clarify the proposed Core Strategy position regarding the proposed direction of growth proposed for the settlements in the District. As such, Swan Hill reserves the right to make additional representations regarding the proposed Policies H1, H2 and H3 following the publication of the SHLAA in due course.

Policy H4 - Affordable Housing

2.15 In general terms, Swan Hill supports the approach taken by the Council towards the provision of affordable housing for new residential developments. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H5 - Dwelling Types

2.16 Swan Hill supports the policy provision of H5, and considers that the approach taken by the Council for this policy represents a suitably flexible alternative to stipulating percentages of dwelling mix, sought by some local authorities. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H6 - Lifetime Homes

2.17 In regard to this policy, Swan Hill objects to the Council's policy where all new dwellings should be provided to the Lifetime Homes Standard. Whilst it is acknowledged that the UK has an aging population, Swan Hill considers that seeking to provide Lifetime Homes on all sites is considered to be overly onerous for proposed developers, particularly when considering the requirement for all car parking spaces to be suitable for disabled users, which could result in more schemes becoming unviable. Therefore, the provision of a percentage of Lifetime Homes should be considered through negotiations with the Council at the planning application stage, and should be determined on a case-by-case basis.

3.0 Character of Place: Policy CP1 - Design

16891 Support

CHAPTER 10 Policy T3 - Public Transport

3.1 The Town and Country Planning (General Development Procedure) Order 1995 (As Amended) makes the submission of a Design and Access Statement for most types of planning applications a Statutory requirement, and as such, the provision of a Design Brief represents a pre-requisite of all major planning applications.

3.2 Policy CP1 seeks to ensure the provision of good, high quality developments that reflect local characteristics and distinctiveness, this ideology is supported by Swan Hill.

4.0 The Green Belt:
Policy GB1 - Green Belt Protection

4.1 Following the amendments to the wording of the Policy since the October 2008 Preferred Options Core Strategy, Swan Hill is now generally supportive of Policy GB1 and its supporting text. However, as expressed above, it is important that where alterations to the Green Belt boundary occur as a result of the extension of the settlements to meet the strategic housing requirement, both the minimal amount of land is taken and where that land is taken for development, it represents the best available land which has a minimal impact of the wider openness characteristic of the Green Belt.

5.0 Environmental Issues:
Policy ENV3 - Flood Risk

5.1 Swan Hill generally supports the approach set out in Policy ENV3 regarding ensuring development accords with the sequential test of PPS25. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV4 - Sustainable Drainage Systems (SUDS)

5.2 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV4. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV8 - On-site Renewable and Low Carbon Energy Generation

5.3 Whilst Swan Hill recognises the importance of reducing carbon emissions, particularly in new housing developments, and the role this can play in reducing the nations overall Greenhouse emissions. As such Swan Hill is generally supportive of Policy ENV8. It is noted that Policy ENG1 of the East of England Plan sets out a threshold of developments comprising 10 or more dwellings. Swan Hill consider it important for the District Council to justify the reduction in the threshold level.

5.4 Further, no assessment of Policy ENV8 has been set out in the Sustainability Appraisal which justifies the change in threshold from that of Policy ENG1 of the RSS.

Policy ENV9 - Code for Sustainable Homes

5.5 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV9. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

6.0 Community Infrastructure, Leisure and Tourism:
Policy CLT1 - Planning Obligations and Standard Charges

6.1 Swan Hill generally supports the overall approach the Council has taken in Policy CLT1. It is considered Policy CLT1 sets out a degree of flexibility to ensure that all sites are considered on a site-by-site basis, assessing the individual merits of each planning application, in order to ensure the levels of contributions applicable meet the five tests of Circular 05/05. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policies CLT5 - Open Space;
CLT7 - Play Space;
CLT8 - Youth Facilities; and,
CLT10 - Playing Pitches

6.2 Swan Hill supports the need for new residential developments to incorporate a degree of new publicly accessible open space, children's play space, youth facilities and playing pitches, and as such, generally supports the policy approaches taken by the Council.

6.3 However, it is important that whilst the Council may seek to undertake an assessment of providing standard charges for new development, which, as set out in Policy CLT1, this should be based on thorough public consultation and consideration and sound justification. Swan Hill consider that within the provision of a standard charge, it is important that such provision allows for a degree of flexibility to ensure that each site is assessed individually and on its own merits. This is particularly important for those sites close to existing open spaces and facilities. As such, the levels of

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CHAPTER 10 Policy T3 - Public Transport

open space and recreation facilities required in the 'standard charge' should be based on an up-to-date PPG17 Open Space assessment, which should be used to form a key consideration in the levels of provision likely to be required in the standard charge system proposed.

7.0 Transport: Policy T1 - Highways

7.1 Swan Hill supports the overall objectives set out in Policy T1 requiring developments to be located and designed to reduce the reliance on the private car and to meet the infrastructure needs generated by development or seek to help achieve these needs is acceptable in principle.

7.2 Swan Hill recognises the importance of providing sufficient infrastructure provision to meet the requirements of development, and that where developments have insufficient consideration of impact on existing infrastructure, they should be considered unacceptable and contrary to National policy guidance. However, Swan Hill considers it important to emphasise that the developer's role should not be seen as a means to meet existing shortfalls in provision.

Policy T3 - Public Transport

7.3 Swan Hill is generally supportive of the policy approach set out in T3, however, as set out in paragraph 7.2 above, it is important that the District Council do not consider that it is the developer's responsibility to resolve existing shortfalls in provision of public transport, and any contribution towards additional public transportation provision should only be to mitigate against the additional level of demand likely from the development proposed.

Policy T5 - Cycling and Walking

7.4 Swan Hill supports the general approach to this policy, as Swan Hill recognises the importance of promoting the use of alternatives to the private car. The policy provision acknowledges the need to ensure relevant contributions in the event of additional travel demands generated by individual developments, whilst also setting out additional aspirations for the cycle network in the District.

7.5 As such, Swan Hill considers this policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy T8 - Parking Standards

7.6 The Council has recently (January 2007) adopted SPD on the requirements for parking standards, and as such, Swan Hill generally supports the policy approach chosen by the Council. As set out in the SPD, whilst Swan Hill generally supports the approach taken by the District Council towards setting residential parking standards, in that the Council has recognised that in the suburban areas, even with some access to public transport, the majority of residents will rely on the use of private cars. However, Swan Hill has concerns over the failure of the District Council to comply with the provisions of PPG13: Transport (2001) which sets out that Local Planning Authorities should not set minimum standards for car parking. Whilst it is acknowledged that PPS3 sets out provision for the consideration of local circumstances, it is considered that the Council has not justified this deviation from PPG13's maximum standard.

7.7 Whilst it is acknowledged that such justification may become apparent through the work currently being undertaken by Essex County Council, until such time, the District Council should only seek to apply the maximum standards indicated in PPG13. However, Swan Hill recommends that the District Council make provisions in the wording of the Policy to allow for changes in the event that future policy on car parking standards need to reflect the County standard, following the completion of the County Council review.

8.0 Economic Development: Policies ED3 - Existing Employment Land ED4 - Future Employment Allocations

8.1 In respect of Policies ED3 and ED4, Swan Hill notes that they have changed considerably since the October 2008 Preferred Options document, in that they are site specific regarding the location of the proposed redevelopment of existing employment sites. These four sites are also identified in Policy H1 - Efficient Use of Land, and in general, Swan Hill supports the approach to the redevelopment of these sites (where feasible) based on the assessments of the sites set out in this version of the Core Strategy.

8.2 However, Swan Hill has concerns that these policies might not be considered suitably sound given that insufficient opportunity has been allocated for consultation on their redevelopment. Without the SHLAA being publically available prior to the consultation on this Core Strategy, an insufficient evidence base has been provided to corroborate that these sites are neither suitable or deliverable to meet the test of soundness requirements.

Summary:

Policy T3 - Public Transport

7.3 Swan Hill is generally supportive of the policy approach set out in T3, however, as set out in paragraph 7.2 above, it is important that the District Council do not consider that it is the developer's responsibility to resolve existing shortfalls in

Core Strategy Submission Document

S - 16891 - 8329 - Policy T3 - Public Transport - None

16891 Support

CHAPTER 10 Policy T3 - Public Transport

provision of public transport, and any contribution towards additional public transportation provision should only be to mitigate against the additional level of demand likely from the development proposed.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 15839 - 4951 - Policy T4 - South Essex Rapid Transit (SERT) - i, ii, iii

15839 Object

CHAPTER 10 Policy T4 - South Essex Rapid Transit (SERT)

Respondent: Hockley Residents Association (Mr B Guyett) [4951] **Agent:** N/A

Hockley Residents Association
2 Tonbridge Road
Hockley
Essex
SS5 5HL

Full Text: SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

Summary: SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

Change to Plan Delete reference to Sert

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16020 - 10324 - Policy T4 - South Essex Rapid Transit (SERT) - i, ii, iii

16020 Object

CHAPTER 10 Policy T4 - South Essex Rapid Transit (SERT)

Respondent: Mrs Jennifer Abbey [10324]

3 Claybrick Avenue
Hockley
Essex
SS5 4PS
UK
07768 542634

Agent: N/A

Full Text: SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

Summary: SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

Change to Plan Revise approach

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

16288 Object

CHAPTER 10 Policy T4 - South Essex Rapid Transit (SERT)

Respondent: Mr David Dare [12098]

1, Woodstock Crescent
Hockley Essex
SS5 4XG
UK
01702 205813

Agent: N/A

Full Text: Highway & Traffic Implications

1. Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;

* (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

* EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

3. RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local

16288 Object

CHAPTER 10 Policy T4 - South Essex Rapid Transit (SERT)

Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

Summary:

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:

* The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

* The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

Previous consultations ignored by RDC:

The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Core Strategy Submission Document

16288 Object

CHAPTER 10 Policy T4 - South Essex Rapid Transit (SERT)

Thus the proposals are not founded on a robust and credible evidence base and are unsound

7. RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

* The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

* the Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!

* The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Summary:

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

the Foundry Industrial Estate has never even been previously mentioned;

The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

9. PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

10. THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food

Core Strategy Submission Document

16288 Object

CHAPTER 10 Policy T4 - South Essex Rapid Transit (SERT)

shopping expenditure.

2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's

existing strengths, rather than retail expansion"

4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moveover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Summary:

SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

16306 Object

CHAPTER 10 Policy T4 - South Essex Rapid Transit (SERT)

Respondent: Mr D Himsley [14206]

4 Brackendale Close
Hockley
Essex
SS5 5AP

Agent: N/A

Full Text: Please find the following objections: -

10 off Unsound Reasons.

1. Highway and Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

3. RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:

The Hockley Parish Plan (dated 2007). The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

7. RDC not consulted on proposals to relocate the Eldon Way and Foundry Industrial Estates

EW; CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" absolutely no consultation on concept of moving EW businesses entirely

FIE; has never even been previously mentioned in any plan version; CS states omission was due to typing error!

Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus proposals are not founded on a robust and credible evidence base and are unsound.

8. The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

Core Strategy Submission Document

16306 Object

CHAPTER 10 Policy T4 - South Essex Rapid Transit (SERT)

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound

9. PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies"

Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which

does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise

residents how such changes will be made and the strategy is unsound.

10. The CS misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The CS states "The R&LS states Hockley has great potential and has a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) "does not lend itself to a food store capable of retaining a significant proportion of main food shopping expenditure.
- 2) "there is no immediate capacity for additional floor space."
- 3) "recommend that focus be maintained on developing Hockley's existing strengths."
- 4) " the Council may wish to consider reclassifying Hockley from a town center, to a district center".

Summary:

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16444 - 14218 - Policy T4 - South Essex Rapid Transit (SERT) - i

16444 Object

CHAPTER 10 Policy T4 - South Essex Rapid Transit (SERT)

Respondent: Barbara Havey [14218]

71 Main Road
Hockley
Essex
SS5 4RG

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.
â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is

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also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

Summary:

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

Previous consultations ignored by RDC:

â€¢ The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

â€¢ The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

Previous consultations ignored by RDC:

The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates
â€¢ The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely
â€¢ the Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!
â€¢ The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Summary:

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RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates
• The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely
• the Foundry Industrial Estate has never even been previously mentioned;
• The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.
 - 2) (10.28) "There is no immediate capacity for additional floor space."
 - 3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion"
 - 4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".
- The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Summary:

SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

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O - 16444 - 14218 - Policy T4 - South Essex Rapid Transit (SERT) - i

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Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16531 - 13921 - Policy T4 - South Essex Rapid Transit (SERT) - i

16531 Object

CHAPTER 10 Policy T4 - South Essex Rapid Transit (SERT)

Respondent: Ms H Rozga [13921]

56A Aldermans Hill
Hockley
Essex
SS5 4RW

Agent: N/A

Full Text:

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus service are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

3. RCD are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

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Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts.

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. Thus it is unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of address the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

Summary:

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:

The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

Previous consultations ignored by RDC:

The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

7. RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates.

The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely.

The Foundry Industrial Estates has never even been previously mentioned in any plan version; A recent amendment to

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16531 Object

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the Core Strategy acknowledges this omission was due to a typing error!

The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Summary:

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates.

The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing FW businesses entirely.

The Foundry Industrial Estate has never even been previously mentioned.

The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate.

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing HAAP consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy or Hockley Area Action Plan (HAAP) defines its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

9. PPS12, 4.6, states that Cores Strategies show be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which do not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

10. The Core Strategy misrepresent the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.

2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion".

4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6.

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CHAPTER 10 Policy T4 - South Essex Rapid Transit (SERT)

Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) "the Council may wish to consider reclassifying Hockley from a town centre to a district centre.

Summary: 5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16549 - 13667 - Policy T4 - South Essex Rapid Transit (SERT) - i

16549 Object

CHAPTER 10 Policy T4 - South Essex Rapid Transit (SERT)

Respondent: G and S Cooke [13667]

56 Aldermans Hill
Hockley
Essex
SS5 4RW

Agent: N/A

Full Text:

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus service are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

Summary:

Proposals for moving employment to of town locations, at either end of the district, with no existing public transport inks, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

3. RCD are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in

Core Strategy Submission Document

16549 Object

CHAPTER 10 Policy T4 - South Essex Rapid Transit (SERT)

the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts.

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs not, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. Thus it is unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of address the railway bridge bottleneck will be significant but is not mentioned.

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The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

Summary:

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:

The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

Previous consultations ignored by RDC:

The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

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7. RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates.

The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely.

The Foundry Industrial Estates has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy acknowledges this omission was due to a typing error!

The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Summary:

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates.

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The Foundry Industrial Estate has never even been previously mentioned.

The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate.

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing HAAP consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy or Hockley Area Action Plan (HAAP) defines its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

9. PPS12, 4.6, states that Cores Strategies show be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which do not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

10. The Core Strategy misrepresent the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.

Core Strategy Submission Document

16549 Object

CHAPTER 10 Policy T4 - South Essex Rapid Transit (SERT)

2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion".

4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) "the Council may wish to consider reclassifying Hockley from a town centre to a district centre.

Summary:

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

16582 Object

CHAPTER 10 Policy T4 - South Essex Rapid Transit (SERT)

Respondent: Heather Wakefield [14231]

Not provided

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighboring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.
â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

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CHAPTER 10 Policy T4 - South Essex Rapid Transit (SERT)

Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modeling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

Summary:

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

Previous consultations ignored by RDC:

• The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

• The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

Previous consultations ignored by RDC:

The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

• The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

• the Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!

• The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Summary:

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

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â€¢ the Foundry Industrial Estate has never even been previously mentioned;
â€¢ The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.
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- The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Summary: SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

S - 16729 - 14244 - Policy T4 - South Essex Rapid Transit (SERT) - None

16729 Support

CHAPTER 10 Policy T4 - South Essex Rapid Transit (SERT)

Respondent: Highways Agency (Mr C Shaw) [14244]

Agent: N/A

Highways Agency
2nd Floor
Woodlands
Manton Lane
Bedford
MK41 7LW
01234 796122

Full Text:

Thank you for inviting the Highways Agency (HA) to comment on the Rochford Core Strategy (CS) Submission Document and Rochford Area Action plan (AAP) prepared by Rochford District Council

As you are aware the HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's motorway and all-purpose trunk road network, collectively known as the Strategic Road Network (SRN), on behalf of the Secretary of State for Transport.

In spatial planning and development control terms, we have a duty to safeguard the operation of the motorway and trunk road network as set out in the Department for Transport Circular: 02/2007: Planning and the Strategic Road Network. <http://www.dft.gov.uk/pgr/regional/strategy/policy/circular207planningandstrategic>. The circular encourages the HA to work co-operatively with Local Planning Authorities within the framework of the Government's policies for planning, growth areas, regeneration, integrated transport and sustainability. We look to your Council's Local Development Framework to promote strategies, policies and land allocations which would support alternatives to the private car.

In the case of Rochford there are no trunk roads within the District although there are two strategic corridors namely the A13 and A127/A1159 which connect into the M25 motorway network at Junctions 30 and 29 respectively. Sections of these areas are currently heavily congested, particularly during peak periods, and operate under considerable levels of network stress. Therefore it is important to the HA that the impact of major development proposals in the Rochford area is considered within the context of future impact on the M25 and the A13 Trunk Road.

Please see below some general comments regarding the soundness of the CS and SSA from a transport perspective, referring to specific proposed submission policies as necessary. This response has been completed with reference to paragraph 4.52 of PPS12 (2008) PPS12, paragraph 4.52 - To be 'sound' a core strategy should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY.

CORE STRATEGY

Policy GB1 - Green Belt Protection

The HA acknowledges that only the minimum amount of Green Belt land will be allocated to meet the District's housing and employment needs as necessary. However, the HA is concerned that any proposed redevelopment of greenbelt sites could result in development in areas with limited access to sustainable transport modes therefore resulting in higher levels of car usage and subsequent impact on the SRN. Although the HA recognizes that new public transport hubs that would facilitate the use of non-car modes could be developed over time, this process is likely to require very substantial investment.

It is therefore important that an appropriate assessment of infrastructure requirements is performed for development sites on Green Belt land. Funding towards the necessary public transport infrastructure improvements must be sought and secured prior to occupation of any new development on greenbelt land. Furthermore, the occupation of such developments should be phased in line with necessary transport infrastructure. This will help the CS meet the PPS12 requirement that a sound DPD should be 'justified' and 'effective' and hence deliverable.

Policy T1 - Highways

Policy T1 highlights the need to reduce reliance on the private car but also observes that 'some impact on the highway network is inevitable'. In a District with such high levels of private car ownership and a limited public transport network, as stated in paragraph 10.2, it will be important to assess the potential impacts to the highway network and ensure that mitigation measures are proposed and implemented where necessary.

An emphasis should be placed on the provision and improvement of sustainable transport infrastructure, particularly where high trip-generating developments such as offices are proposed. In line with the DfT's Guidance on Transport Assessment (2007) - DfT GTA, paragraph 4.51 - 'The key issue is the need to ensure that development proposals strive to achieve nil detriment ('no worse off') to the strategic network, for the opening year and appropriate horizon year'. This emphasis will assist in mitigating potential increases in private vehicle trips and hence help ensure that there is a nil-detriment effect on the SRN.

Policy T3 - Public Transport

Core Strategy Submission Document

S - 16729 - 14244 - Policy T4 - South Essex Rapid Transit (SERT) - None

16729 Support

CHAPTER 10 Policy T4 - South Essex Rapid Transit (SERT)

The recent Planning Inspectorate 'LDF - Learning from Experience' document (September 2009) suggests that a Core Strategy should identify a clear source of funding for infrastructure for at least the first 5 years of the plan - The Planning Inspectorate, LDF: Examining DPDs: Learning from experience, September 2009, Paragraph 22 - 'For at least the first 5 years of the plan it should be clear what infrastructure is required, who is going to fund and provide it and how it is to relate to the rate of development'.. Paragraph 10.15 of the CS highlights the importance of public transport links for new developments and implies that developers may be required to contribute towards public transport provision. However, it is noted that developer contributions cannot be expected to pay for all transport improvements and as such, in line with the recent Planning Inspectorate document outlined above additional sources of funding should be identified. It is recommended that alternative sources of funding for public transport improvements are clearly outlined within the CS to ensure that adequate infrastructure provision is made.

Policy T4 - South Essex Rapid Transit

As mentioned in our response to the Core Strategy Issues and options consultation the HA is supportive of this policy and the need to progress the route through South Essex. This has the potential to reduce the impact on the SRN (A13).

Policy T5 - Travel Plans

The HA welcomes the requirement for a travel plan for developments involving both destination and origin trips. However it is noted that no threshold for employment sites have been specified. Essex County Council requires the production of a workplace travel plan for developments with over 50 employees or where there will be a significant impact on the local road network. To avoid ambiguity for developers, the HA recommends that the Rochford District Core Strategy specifies a similar threshold within Policy T5. This will ensure the Core Strategy is in line with PPG13 paragraph 87 - PPG13 - 'Local authorities are expected to consider setting local targets for the adoption of travel plans by local businesses and other organizations..'

Policy ED2 - London Southend Airport

The HA previously responded to the London Southend and Environs Joint Area Action Plan Preferred Options Document (March 2009). As such, we have not repeated our comments here but instead refer you to our consultation response dated 31 March 2009.

Summary:

Policy T4 - South Essex Rapid Transit

As mentioned in our response to the Core Strategy Issues and options consultation the HA is supportive of this policy and the need to progress the route through South Essex. This has the potential to reduce the impact on the SRN (A13).

Change to Plan

N/A

Appear at exam?

Not Specified

Soundness Tests

N/A

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O - 16926 - 10009 - Policy T4 - South Essex Rapid Transit (SERT) - ii, iii

16926 Object

CHAPTER 10 Policy T4 - South Essex Rapid Transit (SERT)

Respondent: Barratt Eastern Counties [10009]

Barratt Eastern Counties
Barratt House
7 Springfield Lyons Approach
Springfield
Chelmsford
Essex
CM2 5EY

01245 232200

Agent: Kember Loudon Williams Ltd (Mr Martin Hull) [8466]

Kember Loudon Williams Ltd
Ridgers Barn
Bunny Lane
Eridge
Tunbridge Wells

TN3 9HA
Engalnd
01892 750018

Full Text: Local Development Framework

Representations on the Core Strategy
Submission Document, November 2009
On behalf of Barratts Eastern Counties

Introduction

The requirements of Core Strategies are enshrined in the 2004 Planning and Compensation Act, the Town & Country Planning (Local Development) England (Regulations) 2004 and the 2008 policy guidance in PPS12. The requirements of Coe Strategies are clear. And they are legal requirements. The Core Strategy must comply with the Local Development Scheme, Statement of Community Involvement and the Regulations. The Core Strategy must be subject to a sustainability appraisal, have regard to national guidance, conform generally with the Regional Spatial Strategy and have regard to any Sustainable Community Strategy. A Core strategy must be sound - justified, effective and consistent with national policy. The following representations therefore focus on these legal requirements.

HOUSING

Paragraph 4.6 - Evidence Base

To meet the soundness test Submission Core Strategies (SCS) must be justified, that is to say it must be founded on robust and credible evidence base and comprise the most appropriate strategy when considered against reasonable alternatives. The housing strategy in as far as it identifies a need for Green belt sites is sound, however, there are other elements which are unsound.

Paragraph 4.6 notes that the Strategic Housing Land Availability Assessment (SHLAA) has examined the supply of housing. It is presumed that the Table at paragraph 4.6 is the outcome of this examination. Whilst the SHLAA has some legitimacy in that it identifies various sites that are apparently available, we are concerned that because the SHLAA was only published in November 2009 it post dates the SCS. This implies that the SCS is driving the SHLAA exercise rather than the other way round. Whilst this may have no real practical effect on the outcome of the SCS and the identified need for Green Belt sites, the Inspector will be mindful of the advice in paragraphs 33 and 54 of PPS3 that SCS draw on the evidence in SHLAA. It may be that the SCS should explain how the evidence base has been used to justify the strategy.

PPS12 explains at paragraph 4.37 that Core Strategies are based on thorough evidence. Since the SHLAA has only recently been published it is considered that the SCS is unsound as it is not justifiable. This, together with other comments on the SCS, indicates that the process should be delayed to ensure that a more robust document is placed in front of the EiP Inspector.

Table at Paragraph 4.6 - Evidence base

From our review of the available evidence it would appear that the housing land supply is insufficient and that Green Belt release are required. From the wider strategy being promoted we note that some of the sites that the District Council consider to be 'appropriate' are likely to relate to existing employment areas. As set out elsewhere in our representations, we maintain severe reservations that the redevelopment of existing employment sites for alternative uses and particularly the Eldon Way Industrial Estate is unsustainable. We will make reference to the effectiveness of this strategy in relation to sustainability, whether it is justified in the context of National Policy and the deliverability of such a strategy elsewhere.

In particular, paragraph 11.32 of the SCS refers to existing employment land and sites within the UCS. It does not refer the SHLAA and as such it appears that an evidence base to support the re-use of employment land for residential is not reported in the SCS.

Having reviewed the 2008 Annual Monitoring Report, as we did when commenting on the 2008 Preferred Options Core Strategy, we maintain severe doubts as to the appropriateness of some of the previously developed sites identified as potential housing sites and their expected housing yield. Whilst we cannot at this stage ascertain whether the SHLAA

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16926 Object

CHAPTER 10 Policy T4 - South Essex Rapid Transit (SERT)

sites referred to in this table correlate with the Annual Monitoring Report and indeed the 2007 Urban Capacity Study, it is our view that there will be some commonality and so the reliance on these sites is likely to be at odds with Government Policy. We shall elaborate on this objection in relation to the specific housing policy below.

We note that the last two rows in the Table at paragraph 4.6 set out figures with and without Green Belt releases. The text to this section of the Core Strategy should, for reasons of clarity, explain that Green belt review will be necessary in order to deliver the required housing.

Paragraph 4.9

The table on page 40, which sets out the settlement tiers, is supported. Rayleigh, Rochford/Ashingdon, Hockley/Hawkwell are clearly the largest settlements in the District and they benefit from good employment, housing, leisure, community and public transport provision. These settlements are the most sustainable ones with the greatest mix of uses. Consequently, it is sensible that the Core Strategy identifies these as top tier settlements and is able to target them with growth accordingly. This component of the strategy is justified by reference to sustainability data and is effective, since targeting development at these locations will ensure a more sustainable pattern of development.

Paragraph 4.14

We maintain that the strategy for redeveloping the Eldon Way Industrial Estate for housing and other alternative uses to employment is unsound. It is neither justified nor effective. The Industrial Land Availability Study 2006 sets out on page 7 strategic objectives. The 3rd objective seeks to Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive. Clearly the strategy as currently drafted envisages major changes to existing industrial estates, including alternative uses. This strategy is not consistent with other strategies and evidence based studies and so cannot be justified in the context of the tests set out in PPS12. It is also an ineffective strategy since the new employment locations that would free up the Eldon Way site for redevelopment relies on transport infrastructure that has no certainty of being delivered. Principally, the erosion of employment uses at Eldon Way could make the settlement of Hockley/Hawkwell less sustainable and thus conflict with the tiered approach on page 40, paragraph 4.9.

Policy H1

Prioritising the use of previously developed land ("pdl") is supported in principle. It is a justified strategy in the context of PPS3 and effective as sequential choices can be made by implementing the policy. However, the District Council is also promoting a strategy which seeks the redevelopment of existing employment locations to alternative uses and by consequence is identifying green field sites for new employment development elsewhere (Policy ED4 refers). This 'land swapping' is not considered consistent with PPS3, nor is it considered to be justified or effective in delivering the desired strategy. This is particularly the case as most of the existing employment sites are occupied and therefore unavailable for redevelopment. In addition, the new Greenfield sites are in an arguably less sustainable locations away from the top tier settlements identified on page 40 of the Submission Core Strategy. Clearly this element of the strategy is inconsistent with the wider strategy.

The Industrial Land Availability Study 2006 is included as an evidence base by the District Council. It includes an introductory section, which explains that the authority wishes to make Rochford the place of choice for new business. It includes several strategic objectives on page 7 including "Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive." It reviews existing employment areas and identifies vacant land, including land available from allocations. It does not include any assessment of new sites or potential opportunities for new sites that might have been expected to feed into the Core Strategy. The strategy for identifying Green Belt site employment allocation does not appear to be based on any evidence in this document and in that context cannot be justified. The strategy being promoted potentially conflicts with Government policy in PPG13, PPG2 and emerging PPS4.

The Employment Land Study 2008 is a much later document. It has a key recommendation on page ii "we recommend that Rochford District Council adopts strong policies to protect existing employment land." Furthermore under recommendations for existing sites on page iii-iv of that document it states "In our view, Hockley Trading Centre is a strategically well placed employment location. However, we recognise the ambitions of the Hockley Town Centre masterplan and that within this the Council should consider it to be allocated for other uses. However, we recommend that this reallocation happen only if provision is made within the masterplan for office use within Hockley Town Centre as part of a mixed use scheme." The view of the writers of this document is clear - the Eldon Way Industrial estate (Hockley Trading Centre) is a good employment site and that it is for other reasons that alternative uses are being considered and only then if office development is supported. This supports our representations that new future uses at the Eldon Way site should be employment dominated and that alternative uses should relate to the objectives of the Town Centre which is to enhance the shopping and leisure facilities. Residential is not an appropriate alternative.

This document recommends the use of land to the west of Rayleigh for employment and envisages Green belt release. However, the SCS does not explain through the evidence base why existing employment sites should be 'deallocated' and Green belt land unnecessarily used.

Core Strategy Submission Document

16926 Object

CHAPTER 10 Policy T4 - South Essex Rapid Transit (SERT)

In addition to these key issues we have some specific concerns. As a consequence we maintain an objection to the second paragraph of Policy H1. This policy states that the Council will seek the redevelopment of various industrial estates including Eldon Way. The Policy says that alternative uses will be sought (presumably alternative to the existing employment offer) and that new land will be allocated elsewhere. This policy statement, in relation to Eldon Way in particular, is unsound for a number of reasons:

The emerging Hockley Area Action Plan consulted upon in 2008 states that the Eldon Way Industrial Estate is strategically well placed. In a sense this statement underplays the true importance of this highly sustainable employment location and only major employment area in Hockley/Hawkwell. The employment area is adjacent to the railway station and located a short distance from the main bus routes that run along Spa Road. Some of the residential areas of the town are also within walking distance of this commercial area, thus providing a potential for sustainable travel by employees. The Eldon Way Industrial Estate is therefore right at the heart of the settlement of Hockley/Hawkwell and provides an opportunity to meet sustainable transport objectives by reducing the need to travel by car. Consequently, this employment area should be highlighted as a premier employment site in sustainability terms, both in the context of PPG13, PPG4 and PPS6. To encourage alternative uses as set out in Policy H1 implies the removal of the majority of employment based activity at Hockley/Hawkwell and this would be contrary to National policy, would not be the most appropriate strategy when considered against alternatives and is therefore unsound.

Whilst it is acknowledged that improvement to the Eldon Way Industrial Estate can and should take place, the extent to which the mix of employment uses should be altered in favour of alternative land uses requires careful consideration. It is our view that a mix of existing or indeed new employment land uses with some Town Centre type uses should dominate the Eldon Way site. A mix of employment types between offices, light industry and other high technology industries should be encouraged as this will provide many locational advantages to the firms that agglomerate together. The Council says that the existing uses on this site are harmful to amenity. However, the site has operated for many years without any significant issues and if renewal for B1 type uses are encouraged then the employment area can be maintained without harm to amenity. Renewal of the employment stock can help develop and improve trade, improve the sustainability of businesses as a whole and make for a more flexible labour market as skill levels are varied. A singularly different use altogether or a variety of uses which excludes employment could undermine the long term sustainability of the area and Town Centre. As such Policy H1 is not an effective strategy and should be amended to acknowledge the importance of Eldon Way and the need to renew the employment stock to ensure that the site maintains its important role as a employment site, albeit with some ancillary alternative use development where appropriate.

The 2008 Retail Study notes that Hockley Town Centre is not strong and there is trade leakage. Eldon Way Industrial Estate provides a customer base for existing town centre uses. Weekday spending within town centres is an important contributor to the viability of many retail and leisure businesses either through expenditure by employees during the lunchtime trade or expenditure by employers, on necessary goods and services. This relationship helps sustain the critical mass of a centre and provides a platform for new retail and leisure growth. It is important to have a balanced centre with a variety of uses. Policy H1, as currently drafted, implies the removal of employment related development and this is likely to harm the vitality and viability of Hockley Town Centre. The Council has presented no evidence to suggest that this is not the case. Importantly, the 2008 Retail Study explains that there is a need for additional retail and office space. In principle we would support additional office and other B1 type uses plus retail but employment uses should always dominate for the sustainability reasons given above. Retail and office development are likely to present a viable alternative to some of the more industrial type uses.

Consequently, we do not support the phrasing of the third paragraph of Policy H1 and maintain that the most appropriate strategy is to seek renewal of the employment stock with employment based uses and with some new retail development. Removal of employment land uses completely as currently implied-which was the approach adopted in the emerging Hockley Area Action Plan - is not a justifiable strategy.

One of the key tests of a Core Strategy is consistency between policies in the emerging Plan and this strikes at the heart of demonstrating an effective strategy. Policy H1 implies alternative uses to employment and the relocation of Eldon Way to a site identified under Policy ED4. However, Policy RTC6 sets out a suite of policy criteria for Hockley Town Centre which includes employment and commercial activities. In addition Policy ED3 seeks the protection of sustainable employment sites (Eldon Way) and notes that some reallocation of existing employment sites will include a proportion of employment. It notes that in the case of Eldon Way employment development will form a component. The policies appear at odds with one another. The third paragraph of Policy H1 should be deleted as the second paragraph is sufficient to set a strategic context for delivering new housing development. The employment policies and Hockley specific policies should be left to consider the type and quantum of land uses appropriate in the area. If the third paragraph of H1 is to be retained then it should tie in more with Policy RTC6 and in our view explain that employment uses should dominate any redevelopment proposals for the Eldon Way site and that retail and leisure uses should be a supporting proportion.

Implementation, Monitoring and Delivery - page 132 onwards

One of the key tests of soundness is that the Core Strategy should be effective - it should be able to deliver its strategy. The Implementation strategy set out at page 132 onwards of the Core Strategy does not explain how Policy H1, RTC6 and the strategy for redeveloping Eldon Way (Policy ED2 and ED3) will be delivered. The comment at Policy ED3 on

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page 161 identifies it as a potential risk and alludes to land assembly difficulties and the choices to be made by owner/occupiers. In order to deliver the strategy there should be a clear understanding as to whether the new land use values being promoted are sufficient to encourage relocation voluntarily. Secondly there is a need for more information to be gathered and presented to show that current occupiers and landowners are willing to relocate and the timescales likely for this. For example, do the building lease contracts enable early review or are there any break out clauses. There should be some commentary on whether the Council will engage in compulsory purchase orders to pursue their strategy should the 'encouragement' route fail. As currently drafted there is no clear path to deliver the strategy and the danger is that despite reallocation, the sites identified for redevelopment will not come forward in the plan period. In this regard, evidence to satisfy the test of soundness is not provided.

Policy H2 - General Locations

We support the strategy that new housing growth should be targeted at land South of Hawkwell. This area is suitably located to the urban area of Hockley/Hawkwell and to tie in with the settlement tiers on page 40 of the Submission Core Strategy the same terminology for settlement should be used. This ensures a consistency within the SCS. The choice of this location as a housing growth area is appropriate as it would not contribute to the coalescence of the urban area with Ashingdon (there is existing development between this identified housing area at Rectory Road and Ashingdon and moreover, Rectory Road can form a natural physical boundary for the new Green belt boundary. This area is also well located to the existing road network. Cherry Orchard Way has recently been improved and provides much better accessibility to the proposed housing growth area than any other location around Hockley/Hawkwell. The existing bus routes along Rectory Road also make this location sustainable and the additional housing proposed will help underpin the financial viability of bus routes in this area. Locally there are employment opportunities, including the small commercial estate off Main Road. The Eldon Way Industrial Estate adjacent to the Town Centre also provides the opportunity for employment locally. Extensive public open space, play pitches and built leisure facilities are located just to the north of this area and a community hall is located off Briar Close, nearby. The area to the south of Hockley/Hawkwell is close to local shops on the corner of Heycroft Road and Main Road and there are numerous footpath links between this area and the local community including links via Thorpe Road, Thorpe Close, Briar Close, Hawkwell Park and Park Gardens. The area therefore provides the opportunity to enhance existing links, including cycle links, and contribute towards community integration - more so than other sites on the south side of this settlement. The site is also in the control of one house builder and deliverable.

However, we find that the Policy is not fully consistent with national policy and furthermore needs to be reviewed in order to be justified and effective. We have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with this policy and feel that Green Belt review should be more explicit throughout the SCS. We note that it is only Policy H3 which indicates the need for Green Belt land review. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H2 and certainly Policy H3 and Policy GB1 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary.

Policy H2 - Phasing and Quantum

The 2008 Preferred Core Strategy document indicated that the area south of Hawkwell should deliver 330 dwellings over a phasing period to post 2021 (see Policy H2 and H3 of that document). The SCS reduces the quantum of housing in this area to 175 but expects delivery by 2015. At a broader level the Preferred Options Core Strategy of 2008, (Policy H2) required 1,450 dwellings to 2015 and a further 1,050 by 2021. In the SCS the figures are now 775 and 1,010 respectively.

Since the SHLAA post dates the publication of the SCS, we are uncertain as to the reason why such a significant reduction in quantum of housing and extensions to the residential envelope is considered necessary. Presumably it is the 'new' strategy to redevelop existing employment areas within the settlements that has led to this change. Our representations on this strategy and specifically the Eldon Way Industrial Estate are included elsewhere within our representations. Previously we have commented on the Table at paragraph 4.6 of the Submission Core Strategy and the lack of evidence to underpin that table. It seems odd that in the space of a year the expected requirement for Greenfield sites has effectively halved on the basis of a SHLAA exercise. The community is therefore not able to effectively

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comment on the housing land supply and at this stage the Submission Core Strategy is legally unsound.

That said, we are of the view that the quantum of housing envisaged south of Hockley/Hawkwell should be more than the 175 currently envisage. In coming to this view we have reviewed the Urban Capacity Study and the latest housing figures in the Annual Monitoring Report 2008. We conclude that the shortfall in housing land supply is such that 330 dwellings in this location is appropriate.

The recently published SHLAA is based upon the data obtained from the Urban Capacity Study 2007, a call for sites exercise and data from the Annual Monitoring Report 2008.

The 2007 Urban Capacity Study (UCS)

1. 2007 is widely recognised as being the peak level of house prices in the UK and it was acknowledged by Government and practitioners alike that 2007 house prices were at an unsustainable level. It is our view that utilising the 2007 UCS as an evidence base without reference to the market does not pick up the depressed demand that is likely to now exist. Recent corrections to the housing market now mean that housing land prices are at a much lower and arguably more affordable level than before. The implications are that some pdl may not be viable for housing development. Often brownfield sites have much higher development costs than Greenfield sites and so the yield from urban capacity will be much lower than anticipated in the 2007 study. One example is the employment allocation of the Adopted Local Plan located at 76-92 Main Road, Hawkwell. This site has been allocated for several years and has been available during the most recent rises in residential property prices during 2006-07. As a consequence the lack of progress on the site can only be described by its current occupancy and perhaps it comprises high value uses that do not encourage redevelopment. Despite this the site is identified as having high potential for alternative use and high potential demand. The SHLAA form notes that there is no information on legal constraints (e.g., tenancy agreements) As a consequence it is difficult to see how this could continue to be a potential site and as a consequence the allowance for green field releases should be increased.

2. There are considered to be other instances in the UCS and the recently published SHLAA where the assumptions and calculations would indicate that the 1301 urban capacity figure is over optimistic and the SHLAA assessment is limited. In the assessment of 'non-residential sites in appropriate locations' within the UCS assumptions are made as to the probability of sites coming forward for new housing. 68-72 West Street, Rochford is identified as a high probability site but we note that it has been subject to 7 refusals of planning permission/conservation consent. There is a significant gap between the urban capacity identified as being suitable by the Council and the capacity applied for by the owners. Given its alternate use value, it is debateable whether the two capacity figures can be reconciled. No 247 London Road is another example of a site allocated in the Local Plan but which hasn't come forward. This is now the subject of a proposal for a care home and if approved would further limit the scope for market/affordable housing capacity on the site. A striking example of how the urban capacity study has underestimated is also evidence by 2-4 Alderman's Hill, Hockley - described as a disused service station. There has been no residential development application on this site since 2004 and most recent applications have sought commercial use of the site. Rather than being evidence of housing land deliverability, this particular site evidences the need for commercial uses in the area. There are therefore deliverability doubts over these 'high probability' categories which amount to some 40 units.

3. In relation to the assessment in the UCS entitled 'intensification of existing residential uses' we note that the assessment is premised on an assessment of recent trends taking into account net completions between 2001-2006 and 2005-06. This is effectively an assessment of windfall trends and not an approach that PPS3 encourages. Importantly Table 3-12 in the urban capacity study seeks to project forward urban capacity from residential redevelopment - a period that benefited from high house prices and PPG3 guidance encouraging redevelopment. These two circumstances have markedly changed and so the assumptions and conclusions drawn would also have changed. Even taking into account the UCS discounting, the reliability of the 404 units from this source must be questioned and in our view the 1301 figure cannot be a sound basis for urban capacity and further Greenfield releases are necessary.

4. In the section of the UCS entitled 'subdivision of dwellings' and 'living above the shop' it is estimated that recent trends would result in 7 and 15 units. Our concerns with using trends as a basis for urban capacity are detailed above - PPS3 does not encourage this. Rather, local authorities are charged with surveying their areas, identifying which areas may yield urban capacity and how much and developing policies to achieve that. Government guidance does not encourage the estimation of windfalls in the way the UCS does.

5. Redevelopment of established employment land is a separate section within the UCS. At 1 above we identify the low probability of the Main Road residential allocation coming forward. This remaining section of the UCS considers 11 further employment sites which were first identified in the 2000 UCS. Three of these are considered to have a high probability of coming forward. We have looked at these three sites and can find no evidence that they are likely to come forward. In the 8 years between 2000 and 2008 the three identified high probability employment sites have not been developed and there is no reason to assume that the next 5-10 years will be any different. For example the Rawreth Industrial Estate is identified as being well used in the UCS and although it has some unneighbourly uses there is no indication that the site is available, suitable or deliverable for residential. Land between 39-69 Lower Lambricks, Rayleigh is identified as having a high probability of residential uses. Yet there is no

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evidence of any pre-application advice or planning applications for this area. Stambridge Mills, Mill Lane, Stambridge is a further example. This site is separated from the urban area, in a flood risk zone and protected in the 2006 Replacement Local Plan by Policy EB9 which promotes B1 uses. Against this background there is only two relevant planning applications affecting this area both date from the early 1990's and relate to a plant room and loading bay. There is no evidence that this is likely to come forward for residential purposes in the next 5-10 years.

6. In the UCS extant permissions are identified as 856 dwellings. It is important to note that this figure needs to be continually reassessed so that from the point of adoption of the Core Strategy a 5 and 10 year housing land supply is available. The SHLAA notes extant permissions for 2009-14 being 106. As noted below extant permissions do not necessarily translate into deliverable sites. There is therefore a contingency that needs to be built in. Further allocations on greenfield land need to be increased and as such the quantum of housing in the area south of Hockley/Hawkwell should be increased to 330 dwellings in order to begin to meet the shortfall identified.

The District Council's 5 year housing supply assessment

7. The District Council's Annual Monitoring Report ("AMR") 2008 purports to demonstrate a 5 year housing land supply. The preamble to Table 4.10 in the AMR 2008 explains that Rochford District Council ("RDC") has included units under construction, units with full permission, units with outline permission, units with a resolution to grant, units subject to preapplication discussion/Urban Capacity Assessment and land allocations in its trajectory. The reader is referred to Appendix B which breaks down the sites in more detail. The recently published SHLAA also includes a table showing a potential 1273 dwellings deliverable. However, it refers to "appropriate brownfield sites." Since these 'appropriate sites' are do not benefit from an application or a planning permission it is difficult to programme them into the housing delivery trajectory.

8. In the full planning permission category of the AMR 2008 where work has not yet started there can be no guarantee that all these sites will be delivered in the 5 years. This comment relates to the one above in relation to the recently published SHLAA. It is not uncommon for permissions to be obtained to provide a means for valuing a site where the owner has no immediate plans to sell the site or develop housing. Delivery may also be hampered by funding constraints, or site assembly problems (where sites are in an alternative use or relocation constraints). Appendix B of the AMR 2008 does not set out the intentions of the landowner or whether the sites are truly achievable in the 5 year period as per PPS3 requirements. The SHLAA purports to show developer intentions at Appendix C but the assessment by the local authority into the legitimacy of some of the claims is not presented. The evidence base is not as full as it should be to demonstrate the robustness of Table 4.6 of the SCS. It is also unclear the extent to which this table is based on either the UCS 2007, AMR 2008, SHLAA 2009 or a combination of all three. This should be set out clearly.

9. In addition, to the 'non delivery' of a proportion of new homes in the AMR 2008, there is concern at the timings of delivery in that data set, for example, 10 units in 2008-2009 relates to outline planning permissions and it is doubtful whether reserved matters can be turned round quick enough to begin delivering housing in this year period. There could well be examples in that set of data where the delivery of units in the first year of the 5 is unlikely, thus delivery is reduced for that period and pushed back and this process is then compounded throughout the data set up to and beyond year 5. Statistical evidence from the Department of Communities and Local Government ("CLG") reveals that building starts are 43% down on the quarter to March 2009 compared with March 2008. It is not clear whether the recently published SHLAA has taken this into account and unless it does the data in the Table at 4.6 of the SCS cannot be relied upon, particularly given the current recessionary circumstances. In relation to the Table at Paragraph 4.6 a refinement is therefore needed to take into account this effect on phasing.

10. This problem is compounded for other units relied upon where permission has been granted but no start on site has been made; this accounts for a considerable number of sites in 2009-10 period (100 dwellings) which is (year 2 of the 5 year period). A delay in these will require more Greenfield sites to be identified in order to meet the shortfall.

11. Finally we note that the East of England Plan expresses its land supply requirement as a minimum. This strategy is not reflected in the

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Submission version of the Core Strategy policy H2.

12. In summary since neither the UCS nor the Annual Monitoring Report form a SHLAA, reservations are maintained about the degree to which sufficient housing land has been identified.

Policy H3

In the Preferred Options Core Strategy 2008 more locations were identified for housing growth in the post 2021 phase. Whilst it is our view that land south of Hockley/Hawkwell should benefit from a greater number of dwellings than the 175 currently identified (330) in order to make the strategy effective. We are concerned at the significant change in strategy between the Preferred Option Core Strategy and the Submission version, which has significantly less housing growth on green field sites. This change in strategy is so significant that we would question whether it is appropriate in the context of soundness and the consultation processes that have taken place so far.

We also have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with other policies in the SCS and feel that Green Belt review should be more explicit throughout the SCS. As it currently stands there is a potential conflict with national policies and limited justification for the Green belt strategy. We note that in Policy H3, which indicates the need for Green Belt land review, the advice is limited and unclear. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H3 and Policy GB1/H2 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary. Not to do so is unsound for justification and effectiveness reasons.

Policy H4 - Affordable Housing

As currently drafted we feel that the policy is not concise enough and that the policy does not reflect current guidance. The phrase 'at least' would indicate that in most cases affordable housing above 35% will be sought. Our understanding is that the 35% figure is recommended in the SHMA and that to provide a policy framework which seeks to go beyond that figure would potentially be unworkable as many sites could not financially bare the burden of over a third of the net developable area not yielding a value. The policy should be redrafted so that "a target of 35% affordable housing shall be provided on all developments of 15 or more units..."

The last policy paragraph provides some scope to relax this policy, if there are clear site constraints that make on site provision impossible. The policy, though, is not particularly clear on what would constitute exceptional circumstances. For example, physical site constraints, which unusually raise development costs, would be one such reason and this should be specified. There may be other reasons including the nature of housing needs in the part of the District the site is located which justify affordable housing below the 35% target. Design reasons may also have a bearing on how provision is made and in what form, particularly if the site is in an historic area where design might override housing need argument. It is therefore recommended that the policy expand on the type of circumstances where affordable housing may be relaxed and the type of information that will be sought of applicant's who have a need to invoke this part of the policy.

Policy H5

In support of the policy, it is advantageous that no percentages requiring a specific mix are included. This flexibility will enable developers and the Council to respond directly to changing circumstances in the local housing market. In the past some authorities have set out a percentage for the type of housing they require only to find that after a few years of strict implementation there is an oversupply of property of that type and no flexibility in the policy to address the problem.

Policy ED2 - London Southend Airport

It is considered that to grow non aviation related employment at a location north of Southend Airport where sustainable access from the rest of Rochford District requires careful consideration. Most Airports are serviced by aviation related employment development and as such a location close to the airport is sensible and sustainable. However, for surface access reasons it would be inappropriate to encourage travel from Rochford's main settlements to what essentially

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would be a rural location for general employment uses. Whilst sustainable access would be improved by a railway station and better bus links, there is no evidence to suggest that a sustainable surface access strategy for non related employment development at the Airport can be achieved. Paragraph 11.22 explains the critical importance of a railway station to the delivery of the strategy yet the Transport Chapter and Implementation Chapter provide neither a policy nor an assessment of deliverability. It is also notable that the South Essex Rapid Transit Policy T4, as set out at paragraph 10.16, notes that Rochford is not proposed to be served but may be served in future phases. This uncertainty is no way to plan for a major employment land supply strategy in the District. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley/Hawkwell, Rochford and Rayleigh is unsound.

Policy ED3

We fully support the first sentence of the Policy and note the apparent contradiction with the statements in Policy H1 and elsewhere which seeks to develop on alternative uses at industrial estates such as Eldon Way.

This contradiction is evidence in the second paragraph of Policy ED3. In our representations on Policy H1 we have explained why it is not sound to diminish the employment stock at Eldon Way and the importance of maintaining a dominance of employment type uses at this estate. These arguments are not repeated here.

We note the sentiments of the third paragraph and in accordance with our representations elsewhere are of the view that this sentence should be revised to explain that Eldon Way will accommodate principally employment type uses. As noted elsewhere uses which are an alternative to employment would diminish this highly sustainable employment site and this is unsound when assessed against National Policy.

Policy ED4 - Future Employment Allocations

In part, the de-allocation strategy is not supported as it is considered unsound when set against sustainability criteria. In relation to the Eldon Way Industrial Estate it is considered critical to the ongoing sustainability of this settlement that employment uses are maintained at this location. It is close to the railway station, bus routes and local residential areas from which the opportunity exists for employees to walk or cycle to work. Its location adjacent to the Town Centre offers opportunity for some retail and leisure development to complement the centre and to maintain a supporting function. These sustainable benefits would not occur with the deallocation of Eldon Way or the significant erosion of its employment floorspace. Whilst redevelopment of the employment site to achieve new employment is supported, the dominant land use should continue to be employment use. As a consequence, the 18ha of land required for employment in this policy is considered to be excessive and the policy should be reviewed to explain that redevelopment of existing employment sites for primarily new employment development will be encouraged.

Policy T4

It is noted that the South Essex Rapid Transit policy, as elaborated upon at paragraph 10.16 notes that Rochford is not served but may be served in future phases. This uncertainty is contrary to the delivery principles of soundness and directly puts at issue the employment land supply strategy in the District which is founded on sustainable access to new sites. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley, Rochford and Rayleigh is unsound.

Appendix H1, CTL1 - Infrastructure

It is recognised that necessary infrastructure provision is an important part of creating a sustainable development and in that context appendix H1 is supported. The supporting text notes that the table at Appendix H1 is not exhaustive and in that context it is very important that the framework properly distinguishes between what should be provided as part of new development schemes and what shouldn't. It is therefore essential that the framework acknowledges the importance of Circular 05/05 and the tests which say that provision of infrastructure and/or contributions should be:

- * Relevant to planning
- * Necessary to make the proposed development acceptable in planning terms
- * Directly related to the proposed development
- * Fairly and reasonably related in scale and kind to the proposed development
- * Reasonable in all other respects

As is made clear (Paragraph B9 of Circular 5/05) contributions should not be used to make good existing deficiencies in infrastructure provision. Nor are they to be used to secure contributions to the achievement of wider planning objectives that are not necessary for consent to be granted. In that context the Core Strategy should set this out as its policy framework.

Policy GB1 - Green Belt

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The objectives of this policy are supported, although as noted in other representations the SCS is unsound as it does not meet the tests in relation to justification, compliance with national policy or effectiveness of strategy.

Policy GB1 mentions the objective to allocate the minimum amount of Green Belt land necessary. The policy should link to the requirements of PPG2 and RSS which are discussed in relation to the representations on Policy H2 and H3. The policy should set out a timeframe for the review and why Rochford requires a Green Belt review (what the exceptional circumstances are in this District that justify a review of local boundaries. The policy should be amended to set out a 2031 time frame and this may require the SCS to have an extended life span beyond 2021.

We would recommend the deletion of the word character since Green Belt designation is not related to landscape character as currently drafted. For clarity we would also recommend that the Policy or its supporting text explain that a Green Belt review will take place in support of an allocations document (paragraph 6.6) in order to identify an appropriate new boundary. This is particularly necessary given the commitment to a Green belt review in the adopted Local Development Scheme.

Policy CLT1 - Planning Obligations and Standard Charges

In view of the need to test fully the basis on which standard charges are based it is important that any document produced is in a development plan document that enables an examination in public. The policy should explain this in order that when the document is produced it accords with Policy and is based on sound evidence.

ENV9 - Code for Sustainable Homes

Object. The advice from the Department of Communities and Local Government is that the new requirement to have a rating against the Code does not make it mandatory to build a Code home or to have each new home assessed against the Code. It does however mean that all buyers of new homes be given clear information about the sustainability of the new home. A house builder can do this in one of two ways:

- they can choose to build a Code home, have that home assessed against the Code and provide the home buyer with a Code certificate stating the star rating the home has achieved
- or, they can choose to build to current building regulations standards, not to pay for an assessment and instead download a nil-rated certificate of non-assessment (also referred to as a nil-rating) to provide to the home buyer.

As such the Rochford policy requirement that coding 3 be achieved by 2010 and Code 6 by 2013 is out of step with Government advice. The policy wording should explain that it is just the coding that is a requirement of new homes and not necessarily that new homes should be constructed to achieve a standard.

The current Government objectives are for the code to be introduced over a reasonable period with development to be code 3 by 2010, code level 4 by 2013 and code level 5 by 2016. In this regard the policy, as drafted, seeks to achieve code 6 by 2013 and consequently compresses the code requirements into a shorter time scale with the costs associated expected to be subsumed within the housing market through higher prices. This is not a realistic strategy for the delivery of sustainable homes and we consider that the policy should be revised to extend the period of compliance but to also make it more flexible based on local circumstances.

Research undertaken on behalf of the Housing Corporation and English Partnerships, published in February 2007 'A cost review of the code for sustainable homes' reveals that code 6 is unlikely to be unattainable given existing technologies and that achieving code 5 could result in a 12% to 20% increase in costs that would have to be passed onto the consumer. Given the variability of the housing market with peaks and troughs, it is unlikely that the housing market would be able to subsume this level of price increase.

The code system policy as currently drafted does not have regard to site circumstances and so many of the requirements could be difficult to meet. For example, micro electricity generation on site may be difficult to achieve where local circumstances deter the capture of wind or solar power. If more expensive technologies are required to generate power than is the norm then costs will rise. There may be other competing reasons why designs cannot include certain sustainability measures if housing sites are in sensitive landscape and historic locations. Alternatively there may be significant development costs associated with site specific circumstances and so viability of the site's development becomes a valid consideration. By insisting on the code for sustainable homes other policy objectives such as affordable housing at particular rates and other contributions may need to be reconsidered. Consequently, we are of the view that this policy should be drafted in a manner which enables site specific circumstances to be taken into account. As noted above the Government explains that the code is a certification requirement and does not necessarily mean that buildings are constructed in accordance with a code level.

It is also important to note that it is not the purpose of planning legislation to duplicate other legislation. In this regard, the policy should accept that the Building Regulations will be the main vehicle for implementing this policy and that unless the coding requires external development then there will be no need to specify what is to be carried out in a planning application.

Core Strategy Submission Document

O - 16926 - 10009 - Policy T4 - South Essex Rapid Transit (SERT) - ii, iii

16926 Object

CHAPTER 10 Policy T4 - South Essex Rapid Transit (SERT)

Summary: Policy T4

It is noted that the South Essex Rapid Transit policy, as elaborated upon at paragraph 10.16 notes that Rochford is not served but may be served in future phases. This uncertainty is contrary to the delivery principles of soundness and directly puts at issue the employment land supply strategy in the District which is founded on sustainable access to new sites. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley, Rochford and Rayleigh is unsound.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** ii, iii

Core Strategy Submission Document

O - 15865 - 12083 - Travel Plans - i, ii

15865 Object

CHAPTER 10 Travel Plans

Respondent: Mr Paul Sealey [12083]

Agent: N/A

Kirrin,
Hockley Rise,
Hockley
SS5 4PT
United Kingdom
01702206888

Full Text: This is an unnecessary piece of bureaucracy. Who will produce (and pay for) them - the developer, the prospective owner? AT what stage will they be developed? Will they be maintained as circumstances change? Who will monitor their effectiveness?

Summary: This is an unnecessary piece of bureaucracy. Who will produce (and pay for) them - the developer, the prospective owner? AT what stage will they be developed? Will they be maintained as circumstances change? Who will monitor their effectiveness?

Change to Plan Remove this policy

Appear at exam? No

Soundness Tests i, ii

Core Strategy Submission Document

S - 16061 - 14107 - Policy T5 - Travel Plans - None

16061 Support

CHAPTER 10 Policy T5 - Travel Plans

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: We agree this is a very laudable policy, but is it practical and workable?

Summary: We agree this is a very laudable policy, but is it practical and workable?

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16730 - 14244 - Policy T5 - Travel Plans - i, ii

16730 Object

CHAPTER 10 Policy T5 - Travel Plans

Respondent: Highways Agency (Mr C Shaw) [14244]

Highways Agency
2nd Floor
Woodlands
Manton Lane
Bedford
MK41 7LW
01234 796122

Agent: N/A

Full Text:

Thank you for inviting the Highways Agency (HA) to comment on the Rochford Core Strategy (CS) Submission Document and Rochford Area Action plan (AAP) prepared by Rochford District Council

As you are aware the HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's motorway and all-purpose trunk road network, collectively known as the Strategic Road Network (SRN), on behalf of the Secretary of State for Transport.

In spatial planning and development control terms, we have a duty to safeguard the operation of the motorway and trunk road network as set out in the Department for Transport Circular: 02/2007: Planning and the Strategic Road Network. <http://www.dft.gov.uk/pgr/regional/strategy/policy/circular207planningandstrategic>. The circular encourages the HA to work co-operatively with Local Planning Authorities within the framework of the Government's policies for planning, growth areas, regeneration, integrated transport and sustainability. We look to your Council's Local Development Framework to promote strategies, policies and land allocations which would support alternatives to the private car.

In the case of Rochford there are no trunk roads within the District although there are two strategic corridors namely the A13 and A127/A1159 which connect into the M25 motorway network at Junctions 30 and 29 respectively. Sections of these areas are currently heavily congested, particularly during peak periods, and operate under considerable levels of network stress. Therefore it is important to the HA that the impact of major development proposals in the Rochford area is considered within the context of future impact on the M25 and the A13 Trunk Road.

Please see below some general comments regarding the soundness of the CS and SSA from a transport perspective, referring to specific proposed submission policies as necessary. This response has been completed with reference to paragraph 4.52 of PPS12 (2008) PPS12, paragraph 4.52 - To be 'sound' a core strategy should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY.

CORE STRATEGY

Policy GB1 - Green Belt Protection

The HA acknowledges that only the minimum amount of Green Belt land will be allocated to meet the District's housing and employment needs as necessary. However, the HA is concerned that any proposed redevelopment of greenbelt sites could result in development in areas with limited access to sustainable transport modes therefore resulting in higher levels of car usage and subsequent impact on the SRN. Although the HA recognizes that new public transport hubs that would facilitate the use of non-car modes could be developed over time, this process is likely to require very substantial investment.

It is therefore important that an appropriate assessment of infrastructure requirements is performed for development sites on Green Belt land. Funding towards the necessary public transport infrastructure improvements must be sought and secured prior to occupation of any new development on greenbelt land. Furthermore, the occupation of such developments should be phased in line with necessary transport infrastructure. This will help the CS meet the PPS12 requirement that a sound DPD should be 'justified' and 'effective' and hence deliverable.

Policy T1 - Highways

Policy T1 highlights the need to reduce reliance on the private car but also observes that 'some impact on the highway network is inevitable'. In a District with such high levels of private car ownership and a limited public transport network, as stated in paragraph 10.2, it will be important to assess the potential impacts to the highway network and ensure that mitigation measures are proposed and implemented where necessary.

An emphasis should be placed on the provision and improvement of sustainable transport infrastructure, particularly where high trip-generating developments such as offices are proposed. In line with the DfT's Guidance on Transport Assessment (2007) - DfT GTA, paragraph 4.51 - 'The key issue is the need to ensure that development proposals strive to achieve nil detriment ('no worse off') to the strategic network, for the opening year and appropriate horizon year'. This emphasis will assist in mitigating potential increases in private vehicle trips and hence help ensure that there is a nil-detriment effect on the SRN.

Policy T3 - Public Transport

Core Strategy Submission Document

O - 16730 - 14244 - Policy T5 - Travel Plans - i, ii

16730 Object

CHAPTER 10 Policy T5 - Travel Plans

The recent Planning Inspectorate 'LDF - Learning from Experience' document (September 2009) suggests that a Core Strategy should identify a clear source of funding for infrastructure for at least the first 5 years of the plan - The Planning Inspectorate, LDF: Examining DPDs: Learning from experience, September 2009, Paragraph 22 - 'For at least the first 5 years of the plan it should be clear what infrastructure is required, who is going to fund and provide it and how it is to relate to the rate of development'.. Paragraph 10.15 of the CS highlights the importance of public transport links for new developments and implies that developers may be required to contribute towards public transport provision. However, it is noted that developer contributions cannot be expected to pay for all transport improvements and as such, in line with the recent Planning Inspectorate document outlined above additional sources of funding should be identified. It is recommended that alternative sources of funding for public transport improvements are clearly outlined within the CS to ensure that adequate infrastructure provision is made.

Policy T4 - South Essex Rapid Transit

As mentioned in our response to the Core Strategy Issues and options consultation the HA is supportive of this policy and the need to progress the route through South Essex. This has the potential to reduce the impact on the SRN (A13).

Policy T5 - Travel Plans

The HA welcomes the requirement for a travel plan for developments involving both destination and origin trips. However it is noted that no threshold for employment sites have been specified. Essex County Council requires the production of a workplace travel plan for developments with over 50 employees or where there will be a significant impact on the local road network. To avoid ambiguity for developers, the HA recommends that the Rochford District Core Strategy specifies a similar threshold within Policy T5. This will ensure the Core Strategy is in line with PPG13 paragraph 87 - PPG13 - 'Local authorities are expected to consider setting local targets for the adoption of travel plans by local businesses and other organizations..'

Policy ED2 - London Southend Airport

The HA previously responded to the London Southend and Environs Joint Area Action Plan Preferred Options Document (March 2009). As such, we have not repeated our comments here but instead refer you to our consultation response dated 31 March 2009.

Summary:

Policy T5 - Travel Plans

The HA welcomes the requirement for a travel plan for developments involving both destination and origin trips. However it is noted that no threshold for employment sites have been specified. Essex County Council requires the production of a workplace travel plan for developments with over 50 employees or where there will be a significant impact on the local road network.

Change to Plan

To avoid ambiguity for developers, the HA recommends that the Rochford District Core Strategy specifies a similar threshold within Policy T5. This will ensure the Core Strategy is in line with PPG13 paragraph 87 - PPG13 - 'Local authorities are expected to consider setting local targets for the adoption of travel plans by local businesses and other organizations..'

Appear at exam?

Not Specified

Soundness Tests

i, ii

Core Strategy Submission Document

S - 16892 - 8329 - Policy T5 - Travel Plans - None

16892 Support

CHAPTER 10 Policy T5 - Travel Plans

Respondent: Swan Hill Homes Limited [8329]

Swan Hill Homes Limited
C/O Agent
Mr P Kneen
Charles Planning

Agent: Charles Planning Associates Ltd (Mr P Kneen) [5040]

Charles Planning Associates Ltd
1644-1645 Parkway
Solent Business Park
Whiteley
Fareham
Hampshire
PO15 7AH
01489 580853

Full Text:

1.0 Instruction and Introduction

1.1 Charles Planning Associates Limited (Chartered Town Planners) is Instructed by Swan Hill Homes Limited (Swan Hill) to prepare and submit representations on their behalf in respect of the Rochford District Local Development Framework: Core Strategy Submission (September 2009) Development Plan Document.

1.2 The comments refer to the relevant sections and policy designations in the Submission document, as appropriate.

1.3 The comments set out in this submission are intended to assist the District Council in taking forward its Local Development Framework. It is our intention to continue to be involved in the LDF preparation process and we look forward to the opportunity to comment further at the Examination to the Core Strategy.

1.4 If you have any queries regarding the content of this submission then please do not hesitate to contact:

Peter Kneen BSc (Hons) MSc MRTPI
Planner

2.0 Housing:
Policy H1 - The Efficient Use of Land for Housing

2.1 Swan Hill recognises the importance of seeking to concentrate new developments mainly in the existing urban areas, on previously developed land where possible, particularly in view of the Government seeking to ensure 60% of all such new developments are on previously development land (PDL).

2.2 However, given the character of the District, and the strategic housing requirement of the East of England Plan, Swan Hill supports the approach that the Council must also make provision for additional development on the edge of existing settlements on greenfield sites, particularly in the most sustainable locations. As such, Swan Hill supports that where feasible, the redevelopment of existing employment sites for residential/employment purposes can make a contribution towards the strategic housing requirement, provided that sufficient additional employment land is brought forward to ensure the stability of employment levels in the District, and to ensure employment growth meets the East of England Plan requirements.

2.3 Swan Hill considers that Policy H1 should include consideration that new extensions to existing settlements have regard to their potential impact on the wider characteristics and openness objectives of the Green Belt.

Policy H2 - Extensions to Residential Envelopes and Phasing

2.4 Swan Hill generally supports the approach taken by the Council in this policy. As set out above, Swan Hill consider the Council's acknowledgment that housing requirements should be met through the allocation of land on the edge of the existing settlements is the most suitable way forward to meeting the Council's strategic housing requirement and complies with the advice in PPS3.

2.5 The need for suitable greenfield urban extensions represents the best way forward for the Council to meet its strategic housing requirement, as set out in the East of England Plan. Swan Hill supports the recognition that the potential supply of alternative previously developed sites is limited, without detrimentally affecting the character of the District, and therefore the best way forward is the use of sustainable greenfield urban extensions to the existing settlements of the District.

2.6 However, Swan Hill consider that a fundamental consideration that the District Council should consider relates to the potential impact of the urban extensions on the Green Belt policy has been somewhat overlooked. The wider sustainability credentials of the settlements of the District should only be one of many key considerations for determining the level of expansion. In view of the proximity of Southend-on-Sea to all the main settlements of the District, and the influence this has on the likely location many people would travel for employment and leisure, sustainability of many of the settlements is not a key overarching factor, and greater weight should be placed on the potential impact on the openness of the Green Belt, as this cannot be remedied if development occurs in the wrong location.

2.7 As such, Swan Hill considers that determining the location of growth for the main settlements should be to identify

16892 Support

CHAPTER 10 Policy T5 - Travel Plans

those locations where the impact on the wider setting of the Green Belt can be minimised. Further justification for those general locations chosen should be identified in Policy H2. In this regard, Swan Hill has serious concerns regarding the removal of Land South West of Great Wakering as a viable option for the growth of the settlement. The development of this area of Great Wakering, in addition to the potential redevelopment of the Star Lane Industrial Estate could provide a more comprehensive development, whilst ensuring that the wider openness of the Green Belt is maintained. Land South West of Great Wakering is significantly better placed to limit the impact on the wider Green Belt than Land West of Great Wakering, and could contribute to the provision of an important amenity and wildlife site for the local community.

2.8 In addition, Swan Hill consider that the Council now has no reserve provision in the event that any of the existing employment sites set out in Policy H1 fail to come forward for development within the envisaged timescale. Further, Land West of Great Wakering has not been identified in the SHLAA as a deliverable site to help meet the strategic housing requirement, contrary to the requirement set out in PPS3.

2.9 As such, Swan Hill would support the provision of suitable sites which could be safeguarded for future development in the likelihood of a shortfall in supply.

Policy H3 - Extensions to Residential Envelopes Post 2021

2.10 As set out above, Swan Hill supports the overall approach the Council has taken towards the provision of sustainable urban extensions as a suitable means of meeting their strategic housing requirement. However, as set out for Policy H2 above, Swan Hill has serious concerns regarding the removal of several proposed sites set out in the October 2008 Preferred Options Core Strategy, without any guarantee of the ability to deliver those sites set out in Policy H1.

2.11 As also considered above, the inclusion of West of Great Wakering for 250 dwellings should not be included ahead of South West of Great Wakering, in view of the fact that the site is not identified in the SHLAA as available, suitable and achievable as required by PPS3, and thus is not supported by a robust and creditable evidence base for its inclusion as a strategic site for development.

2.12 Whilst Swan Hill acknowledge that alterations to Policy H1 has resulted in the removal of some locations for growth in Policy H3 (as set out in the Sustainability Appraisal), Swan Hill does not consider that the most appropriate locations have been chosen.

2.13 In addition to the matters raised above, the use of West of Great Wakering would also result in the loss of valuable agricultural land, which clearly in a Green Belt location, should be less suitable for development than other sites, such as South West of Great Wakering, which would have limited impact on the wider Green Belt policy, and not result in the loss of valuable agricultural land.

2.14 Finally, in respect of Policies H1, H2 and H3, all of the above comments are based on our interpretation of the Submission Version Core Strategy when compared to the October 2008 Version of the Core Strategy. Without the ability to undertake a detailed assessment of the Council's SHLAA, it is not possible to clarify the proposed Core Strategy position regarding the proposed direction of growth proposed for the settlements in the District. As such, Swan Hill reserves the right to make additional representations regarding the proposed Policies H1, H2 and H3 following the publication of the SHLAA in due course.

Policy H4 - Affordable Housing

2.15 In general terms, Swan Hill supports the approach taken by the Council towards the provision of affordable housing for new residential developments. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H5 - Dwelling Types

2.16 Swan Hill supports the policy provision of H5, and considers that the approach taken by the Council for this policy represents a suitably flexible alternative to stipulating percentages of dwelling mix, sought by some local authorities. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H6 - Lifetime Homes

2.17 In regard to this policy, Swan Hill objects to the Council's policy where all new dwellings should be provided to the Lifetime Homes Standard. Whilst it is acknowledged that the UK has an aging population, Swan Hill considers that seeking to provide Lifetime Homes on all sites is considered to be overly onerous for proposed developers, particularly when considering the requirement for all car parking spaces to be suitable for disabled users, which could result in more schemes becoming unviable. Therefore, the provision of a percentage of Lifetime Homes should be considered through negotiations with the Council at the planning application stage, and should be determined on a case-by-case basis.

3.0 Character of Place: Policy CP1 - Design

16892 Support

CHAPTER 10 Policy T5 - Travel Plans

3.1 The Town and Country Planning (General Development Procedure) Order 1995 (As Amended) makes the submission of a Design and Access Statement for most types of planning applications a Statutory requirement, and as such, the provision of a Design Brief represents a pre-requisite of all major planning applications.

3.2 Policy CP1 seeks to ensure the provision of good, high quality developments that reflect local characteristics and distinctiveness, this ideology is supported by Swan Hill.

4.0 The Green Belt:
Policy GB1 - Green Belt Protection

4.1 Following the amendments to the wording of the Policy since the October 2008 Preferred Options Core Strategy, Swan Hill is now generally supportive of Policy GB1 and its supporting text. However, as expressed above, it is important that where alterations to the Green Belt boundary occur as a result of the extension of the settlements to meet the strategic housing requirement, both the minimal amount of land is taken and where that land is taken for development, it represents the best available land which has a minimal impact of the wider openness characteristic of the Green Belt.

5.0 Environmental Issues:
Policy ENV3 - Flood Risk

5.1 Swan Hill generally supports the approach set out in Policy ENV3 regarding ensuring development accords with the sequential test of PPS25. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV4 - Sustainable Drainage Systems (SUDS)

5.2 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV4. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV8 - On-site Renewable and Low Carbon Energy Generation

5.3 Whilst Swan Hill recognises the importance of reducing carbon emissions, particularly in new housing developments, and the role this can play in reducing the nations overall Greenhouse emissions. As such Swan Hill is generally supportive of Policy ENV8. It is noted that Policy ENG1 of the East of England Plan sets out a threshold of developments comprising 10 or more dwellings. Swan Hill consider it important for the District Council to justify the reduction in the threshold level.

5.4 Further, no assessment of Policy ENV8 has been set out in the Sustainability Appraisal which justifies the change in threshold from that of Policy ENG1 of the RSS.

Policy ENV9 - Code for Sustainable Homes

5.5 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV9. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

6.0 Community Infrastructure, Leisure and Tourism:
Policy CLT1 - Planning Obligations and Standard Charges

6.1 Swan Hill generally supports the overall approach the Council has taken in Policy CLT1. It is considered Policy CLT1 sets out a degree of flexibility to ensure that all sites are considered on a site-by-site basis, assessing the individual merits of each planning application, in order to ensure the levels of contributions applicable meet the five tests of Circular 05/05. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policies CLT5 - Open Space;
CLT7 - Play Space;
CLT8 - Youth Facilities; and,
CLT10 - Playing Pitches

6.2 Swan Hill supports the need for new residential developments to incorporate a degree of new publicly accessible open space, children's play space, youth facilities and playing pitches, and as such, generally supports the policy approaches taken by the Council.

6.3 However, it is important that whilst the Council may seek to undertake an assessment of providing standard charges for new development, which, as set out in Policy CLT1, this should be based on thorough public consultation and consideration and sound justification. Swan Hill consider that within the provision of a standard charge, it is important that such provision allows for a degree of flexibility to ensure that each site is assessed individually and on its own merits. This is particularly important for those sites close to existing open spaces and facilities. As such, the levels of

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CHAPTER 10 Policy T5 - Travel Plans

open space and recreation facilities required in the 'standard charge' should be based on an up-to-date PPG17 Open Space assessment, which should be used to form a key consideration in the levels of provision likely to be required in the standard charge system proposed.

7.0 Transport: Policy T1 - Highways

7.1 Swan Hill supports the overall objectives set out in Policy T1 requiring developments to be located and designed to reduce the reliance on the private car and to meet the infrastructure needs generated by development or seek to help achieve these needs is acceptable in principle.

7.2 Swan Hill recognises the importance of providing sufficient infrastructure provision to meet the requirements of development, and that where developments have insufficient consideration of impact on existing infrastructure, they should be considered unacceptable and contrary to National policy guidance. However, Swan Hill considers it important to emphasise that the developer's role should not be seen as a means to meet existing shortfalls in provision.

Policy T3 - Public Transport

7.3 Swan Hill is generally supportive of the policy approach set out in T3, however, as set out in paragraph 7.2 above, it is important that the District Council do not consider that it is the developer's responsibility to resolve existing shortfalls in provision of public transport, and any contribution towards additional public transportation provision should only be to mitigate against the additional level of demand likely from the development proposed.

Policy T5 - Cycling and Walking

7.4 Swan Hill supports the general approach to this policy, as Swan Hill recognises the importance of promoting the use of alternatives to the private car. The policy provision acknowledges the need to ensure relevant contributions in the event of additional travel demands generated by individual developments, whilst also setting out additional aspirations for the cycle network in the District.

7.5 As such, Swan Hill considers this policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy T8 - Parking Standards

7.6 The Council has recently (January 2007) adopted SPD on the requirements for parking standards, and as such, Swan Hill generally supports the policy approach chosen by the Council. As set out in the SPD, whilst Swan Hill generally supports the approach taken by the District Council towards setting residential parking standards, in that the Council has recognised that in the suburban areas, even with some access to public transport, the majority of residents will rely on the use of private cars. However, Swan Hill has concerns over the failure of the District Council to comply with the provisions of PPG13: Transport (2001) which sets out that Local Planning Authorities should not set minimum standards for car parking. Whilst it is acknowledged that PPS3 sets out provision for the consideration of local circumstances, it is considered that the Council has not justified this deviation from PPG13's maximum standard.

7.7 Whilst it is acknowledged that such justification may become apparent through the work currently being undertaken by Essex County Council, until such time, the District Council should only seek to apply the maximum standards indicated in PPG13. However, Swan Hill recommends that the District Council make provisions in the wording of the Policy to allow for changes in the event that future policy on car parking standards need to reflect the County standard, following the completion of the County Council review.

8.0 Economic Development: Policies ED3 - Existing Employment Land ED4 - Future Employment Allocations

8.1 In respect of Policies ED3 and ED4, Swan Hill notes that they have changed considerably since the October 2008 Preferred Options document, in that they are site specific regarding the location of the proposed redevelopment of existing employment sites. These four sites are also identified in Policy H1 - Efficient Use of Land, and in general, Swan Hill supports the approach to the redevelopment of these sites (where feasible) based on the assessments of the sites set out in this version of the Core Strategy.

8.2 However, Swan Hill has concerns that these policies might not be considered suitably sound given that insufficient opportunity has been allocated for consultation on their redevelopment. Without the SHLAA being publically available prior to the consultation on this Core Strategy, an insufficient evidence base has been provided to corroborate that these sites are neither suitable or deliverable to meet the test of soundness requirements.

Summary:

Policy T5 - Cycling and Walking

7.4 Swan Hill supports the general approach to this policy, as Swan Hill recognises the importance of promoting the use of alternatives to the private car. The policy provision acknowledges the need to ensure relevant contributions in the

Core Strategy Submission Document

S - 16892 - 8329 - Policy T5 - Travel Plans - None

16892 Support

CHAPTER 10 Policy T5 - Travel Plans

event of additional travel demands generated by individual developments, whilst also setting out additional aspirations for the cycle network in the District.

7.5 As such, Swan Hill considers this policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 15706 - 11729 - Policy T6 - Cycling and Walking - None

15706 Support

CHAPTER 10 Policy T6 - Cycling and Walking

Respondent: Mrs Sue Malin [11729]

29 King Henry's Drive, Rochford, Essex
SS4 1HY
United Kingdom
01702541385

Agent: N/A

Full Text: when making these consideration, would you please also remember the people who use mobility scooters, the new developement on the old hospital grounds, from the new library to the main road, can be difficult to use, as only one side has pavement and dropped curb.

Summary: when making these consideration, would you please also remember the people who use mobility scooters, the new developement on the old hospital grounds, from the new library to the main road, can be difficult to use, as only one side has pavement and dropped curb.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16141 - 9647 - Policy T6 - Cycling and Walking - None

16141 Support

CHAPTER 10 Policy T6 - Cycling and Walking

Respondent: Mr David Fryer-Kelsey [9647]

113 Greensward Lane
Hockley
Essex
ss5 5hs
uk
01702 203455

Agent: N/A

Full Text: The residents of Hockley have already requested the provision of cycle lanes and appropriate access points - Hockley to Rayleigh and Hockley to Rochford and to all schools in Hockley. The response is that there is no space for continuous stretches.

Space will not magically appear so it is not possible for this part of the Core Strategy to be implemented.

Summary: The residents of Hockley have already requested the provision of cycle lanes and appropriate access points - Hockley to Rayleigh and Hockley to Rochford and to all schools in Hockley. The response is that there is no space for continuous stretches.

Space will not magically appear so it is not possible for this part of the Core Strategy to be implemented.

Change to Plan N/A

Appear at exam? Not Specified

Soundness Tests N/A

Core Strategy Submission Document

S - 16156 - 9823 - Policy T6 - Cycling and Walking - None

16156 Support

CHAPTER 10 Policy T6 - Cycling and Walking

Respondent: mr alistir matthews [9823]

Agent: N/A

telfords farm
chelmsford road
battlesbridge
wickford
SS118TR
uk
01268732069

Full Text: More thought needs to be put to provision of cycling and walking .For example it states that watery lane and beeches road are to be improved to take extra traffic from hullbridge this will be in direct conflict with the stated intention to direct cyclists down these roads on a sustrans network .It is already too dangerous to cycle safely down there .There is also conflict with pedestrians as there is no path or refuge leading from a footpath from hullbridge to battlesbridge until the seawall is open for access under new legislation .

Summary: More thought needs to be put to provision of cycling and walking .For example it states that watery lane and beeches road are to be improved to take extra traffic from hullbridge this will be in direct conflict with the stated intention to direct cyclists down these roads on a sustrans network .It is already too dangerous to cycle safely down there .There is also conflict with pedestrians as there is no path or refuge leading from a footpath from hullbridge to battlesbridge until the seawall is open for access under new legislation .

Change to Plan N/A

Appear at exam? Not Specified

Soundness Tests N/A

Core Strategy Submission Document

S - 16184 - 5322 - Policy T6 - Cycling and Walking - None

16184 Support

CHAPTER 10 Policy T6 - Cycling and Walking

Respondent: Pond Chase Nurseries Ltd [5322]

Pond Chase Nurseries Ltd
Folly Lane
Hockley
Essex
SS5 4SR

Agent: Boyer Planning Ltd (Mr R Ricks) [8313]

Boyer Planning Ltd
49 North Hill
Colchester
Essex
CO1 1PY
01206 769018

Full Text: We support this policy since the provision of facilities for cycling and walking would be consistent with proposals for the development of Pond Chase Nursery site. The developer of the site will work with the relevant authorities including Sustrans to make provision for cycle routes through the site to link to existing and proposed cycling facilities within the West Hockley area.

Summary: We support this policy since the provision of facilities for cycling and walking would be consistent with proposals for the development of Pond Chase Nursery site. The developer of the site will work with the relevant authorities including Sustrans to make provision for cycle routes through the site to link to existing and proposed cycling facilities within the West Hockley area.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16238 - 8650 - Policy T6 - Cycling and Walking - None

16238 Support

CHAPTER 10 Policy T6 - Cycling and Walking

Respondent: Countryside Properties (Southern) Ltd (Mr Steve Price) [8650] **Agent:** N/A

Countryside Properties (Southern) Ltd
Countryside House
The Drive
Brentwood
Essex
CM13 3AT
01277260000

Full Text: We agree with the principles of this policy. However, the scale of any contributions towards such initiatives should of course reasonably relate to the impact of the development of the land in question. Circular 5/05 and the emerging/published DCLG guidance on the use of CIL, makes it clear that new developments/contributions from new development can not be used to resolve existing deficiencies (only, proportionally, those deficiencies made worse by new development).

The extent of contributions should be determined at the time at which a masterplan or development brief is prepared for a site.

Summary: We agree with the principles of this policy. However, the scale of any contributions towards such initiatives should of course reasonably relate to the impact of the development of the land in question. Circular 5/05 and the emerging/published DCLG guidance on the use of CIL, makes it clear that new developments/contributions from new development can not be used to resolve existing deficiencies (only, proportionally, those deficiencies made worse by new development).

The extent of contributions should be determined at the time at which a masterplan or development brief is prepared for a site.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16389 - 8267 - Policy T6 - Cycling and Walking - None

16389 Support

CHAPTER 10 Policy T6 - Cycling and Walking

Respondent: Aber Ltd [8267]

Aber Ltd
C/o Agent

Agent: Colliers CRE (Mr S Chapman) [8266]

Colliers CRE
9 Marylebone Lane
London
W1U 1HL
020 7344 6533

Full Text:

The provision of a safe and convenient network of cycle and pedestrian routes linking homes with workplace, services and town centres will encourage people to travel by means other than the private car.

Summary:

The provision of a safe and convenient network of cycle and pedestrian routes linking homes with workplace, services and town centres will encourage people to travel by means other than the private car.

Change to Plan N/A

Appear at exam? No

Soundness Tests N/A

Core Strategy Submission Document

S - 16240 - 8650 - Policy T7 - Greenways - None

16240 Support

CHAPTER 10 Policy T7 - Greenways

Respondent: Countryside Properties (Southern) Ltd (Mr Steve Price) [8650] **Agent:** N/A

Countryside Properties (Southern) Ltd
Countryside House
The Drive
Brentwood
Essex
CM13 3AT
01277260000

Full Text: Again, we have no objections or issues of soundness regarding this policy. However, the scale of any contributions required towards the provision of any greenway should of course reasonably relate to the impact of the development of the land in question. Circular 5/05 and the emerging/published DCLG guidance on the use of CIL, makes it clear that new developments/contributions from new development can not be used to resolve existing deficiencies (only, proportionally, those deficiencies made worse by new development).

The extent of contributions, or extent of provision of a greenway should be determined at the time at which a masterplan or development brief is prepared for a development site.

Summary: The scale of any contributions required towards the provision of any greenway should of course reasonably relate to the impact of the development of the land in question. Circular 5/05 and the emerging/published DCLG guidance on the use of CIL, makes it clear that new developments/contributions from new development can not be used to resolve existing deficiencies (only, proportionally, those deficiencies made worse by new development).

The extent of contributions, or extent of provision of a greenway should be determined at the time at which a masterplan or development brief is prepared for a development site.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 15944 - 9032 - Policy T8 - Parking Standards - None

15944 Support

CHAPTER 10 Policy T8 - Parking Standards

Respondent: Essex Chambers of Commerce (Mr John Dallaway) **Agent:** N/A
[9032]

Essex Chambers of Commerce
2nd Floor,
Viscount House,
London Southend Airport, Southend-on-Sea.
Essex.
SS2 6YF
01702-560100

Full Text: Essential that there are appropriate levels of parking allowed in new residential developments to remove on-street parking and congestion.

Summary: Essential that there are appropriate levels of parking allowed in new residential developments to remove on-street parking and congestion.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 15998 - 13441 - Policy T8 - Parking Standards - None

15998 Support

CHAPTER 10 Policy T8 - Parking Standards

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: Ensure conformity with the East of England Plan (Policy T14 and para 7.37)

Summary: Ensure conformity with the East of England Plan (Policy T14 and para 7.37)

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16062 - 14107 - Policy T8 - Parking Standards - None

16062 Support

CHAPTER 10 Policy T8 - Parking Standards

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: We agree. There must be adequate parking spaces per dwelling in new developments - not just the minimum required - they need to be realistic. To apply the minimum will cause congestion and frustration to residents.

Summary: We agree. There must be adequate parking spaces per dwelling in new developments - not just the minimum required - they need to be realistic. To apply the minimum will cause congestion and frustration to residents.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16103 - 7336 - Policy T8 - Parking Standards - None

16103 Support

CHAPTER 10 Policy T8 - Parking Standards

Respondent: Rayleigh Town Council (Mrs K Cumberland) [7336] **Agent:** N/A

Rayleigh Town Council
The Pavilion
King George V Playing Field
Bull Lane
Rayleigh
Essex
SS6 8JD

01268 741880

Full Text: We strongly support what is a commonsense approach to the provision of minimum parking standards to residential developments.

Summary: We strongly support what is a commonsense approach to the provision of minimum parking standards to residential developments.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16142 - 9647 - Policy T8 - Parking Standards - None

16142 Support

CHAPTER 10 Policy T8 - Parking Standards

Respondent: Mr David Fryer-Kelsey [9647]

113 Greensward Lane
Hockley
Essex
ss5 5hs
uk
01702 203455

Agent: N/A

Full Text: Another important factor not addressed in this document is commuter parking near railway stations. This totally overburdens streets up to a mile from the station and must be controlled. Commuter parking should be banned, usually by banning parking at certain hours such as 10 to 11 am which makes it impossible for commuters. It would be necessary to provide better public transport from areas such as Ashingdon which do not have a railway connection. In many cases the regulations are there but not regularly enforced.

Summary: Another important factor not addressed in this document is commuter parking near railway stations. This totally overburdens streets up to a mile from the station and must be controlled. Commuter parking should be banned, usually by banning parking at certain hours such as 10 to 11 am which makes it impossible for commuters. It would be necessary to provide better public transport from areas such as Ashingdon which do not have a railway connection. In many cases the regulations are there but not regularly enforced.

Change to Plan N/A

Appear at exam? Not Specified

Soundness Tests N/A

Core Strategy Submission Document

S - 16143 - 9647 - Policy T8 - Parking Standards - None

16143 Support

CHAPTER 10 Policy T8 - Parking Standards

Respondent: Mr David Fryer-Kelsey [9647]

113 Greensward Lane
Hockley
Essex
ss5 5hs
uk
01702 203455

Agent: N/A

Full Text: The policy should also cover the subject of parents parking outside schools to collect their children. This parking is notoriously anti-social, on pavements, across drives, on verges etc. It can and often does obstruct the pavements making it difficult for prams and motorised scooters to pass. It also obstructs the road making it difficult for the emergency services to pass. The regulations should be clear and always carried out by the authorities.

Summary: The policy should also cover the subject of parents parking outside schools to collect their children. This parking is notoriously anti-social, on pavements, across drives, on verges etc. It can and often does obstruct the pavements making it difficult for prams and motorised scooters to pass. It also obstructs the road making it difficult for the emergency services to pass. The regulations should be clear and always carried out by the authorities.

Change to Plan N/A

Appear at exam? Not Specified

Soundness Tests N/A

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CHAPTER 10 Policy T8 - Parking Standards

Respondent: Colonnade Land LLP [9177]

Colonnade Land LLP
Fifth Floor
17-19 Maddox Street
London
W15 2QH
020 7255 7490

Agent: Icen Projects Limited (David Churchill) [10057]

Icen Projects Limited
83 Victoria Street
London
SJ1H 0HW

Full Text: ROCHFORD DISTRICT COUNCIL - LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY SUBMISSION
SEPTEMBER 2009

Icen Projects Ltd (Icen) has been instructed by Colonnade Land LLP (Colonnade) to submit representations to the Rochford Local Development Framework Core Strategy Submission (CSS).

a) Overview

It is our conclusion that the CSS is not justified, effective or consistent with national policy, as required by Planning Policy Statement 12: Creating Strong Safe and Prosperous Communities through Local Spatial Planning (PPS12) and is therefore vulnerable to being found unsound by an Inspector through the Examination in Public.

b) Background and Summary

These representations follow those made by Icen on behalf of Colonnade to the Preferred Options Core Strategy, submitted via letter dated 17 December 2008. In this regard, we would request that the Council confirms that the representations made to the Preferred Options Core Strategy will be taken into account alongside the current representations, particularly as there are a number of cross references between the two sets of representations.

It is not considered necessary to reiterate the content of the previous representations, as they were made at the appropriate stage and will be considered by the Planning Inspectorate in due course, but it is inevitable that certain elements will require restating where it is not clear that they have been taken into account in the production of the CSS. For clarity, therefore, Colonnade feel that it is appropriate to clarify the 'in-principle' issues that were raised in the representations to the Preferred Options Core Strategy, recognising that these issues were raised in the context of a wider and more coherent justification made within the representations:

- â€¢ Further cross-referencing of the recommendations made within the evidence base is required;
- â€¢ Greater focus should be placed on promoting Rochford as the principal settlement within the District;
- â€¢ Coombes Farm is the most logical location for residential development abutting the urban area of Rochford and as such warrants recognition as a general location for residential development;
- â€¢ The allocation of Three Ashes Farm for employment generating uses will be pursued;
- â€¢ Recognition that it is not realistic to expect residential allocations to be met mainly on Brownfield sites, nor should the intensification of smaller sites in residential areas be pursued;
- â€¢ Many of the sites identified as suitable for residential development will not be viable and will not come forward for development within the timescales anticipated;
- â€¢ The failure to provide the necessary justification for the proposed infrastructure improvements sought in Appendix H1;
- â€¢ The inclusion of an affordable housing exception policy was sought; and
- â€¢ The need to identify sites capable of delivering employment growth in the short term.

Following assessment of the CSS presented by the Council for consultation prior to submission to the Secretary of State, Colonnade considers the Plan to be 'unsound' as the document consistently fails to meet the tests of soundness set out in the table following Paragraph 4.52 of PPS12. For clarity, PPS12 confirms that to be 'sound' a Core Strategy should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY and defines 'justified' as "founded on a robust and credible evidence base" and "the most appropriate strategy when considered against the reasonable alternatives" and 'effective' as "deliverable", "flexible" and "able to be monitored".

The rationale for the above is identified in the remainder of these representations, which are provided in the interests of ensuring the Council delivers a strong, robust and logical Core Strategy that guides the future development of the District in a justified and effective manner.

b) Colonnade

As the Council is aware from previous submissions to the Local Development Framework, Colonnade is a strategic land company with a particular interest in the future development of the District as a consequence of a number of sites that it controls, particularly around Rochford.

The Council will also be aware that Colonnade has recently submitted an outline planning application for the residential development of the land at Coombes Farm, Rochford to provide a sustainable urban extension comprising up to 326

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residential dwellings, with associated accesses and community uses. Whilst the planning application process is clearly separate from the Local Development Framework production process, Colonnade wishes to continue the promotion of the site as a suitable location for residential development.

Accordingly, these representations focus on the legal requirements and tests of soundness associated principally with the Housing and Employment chapters of the CSS, with reference where appropriate to the sites that are controlled by Colonnade, the outline planning application at Coombes Farm and other issues where relevant.

c) Housing

i. Date of Adoption

The CSS assumes an adoption date of 2010 and plans for the provision of housing to 2025.

Taking account of the potential delays to the adoption of the Plan, including the Examination process, it would be more appropriate for the CSS to provide sufficient flexibility to allow for delays in its adoption. Colonnade considers an adoption date of 2011 for the CSS is a more realistic target.

Taking account of the advice in Paragraph 4.13 of PPS12, which states that the time horizon for the Core Strategy should be "at least 15 years from the date of adoption" it would be appropriate for the CSS to plan for the provision of housing to 2026 at the earliest. As such, Colonnade does not consider the CSS to be 'flexible' in the context of the tests of soundness in the table following Paragraph 4.52 of PPS12.

ii. Housing Delivery

However, setting the above aside, the Housing Chapter identifies the minimum housing delivery target for the period 2001 to 2021 of 4,600 dwellings as set out in the East of England Plan, with the annual average requirement of 250 dwellings per annum to extend provision from 2021 to 2025. It also confirms that the residual target for the period 2006 to 2021 is 3,790 dwellings, taking account of the delivery of 810 dwellings in the period 2001 to 2006, and a further 618 dwellings have been completed between 2006 and 2008.

This leaves a residual housing provision target of a minimum of 3,172 dwellings in the period 2008 to 2021. Taking into account the required provision beyond 2021, the residual housing provision target in the period 2008 to 2025 is a minimum of 4,172 dwellings. The disparity between these figures and those provided within the CSS are explained by the rounding down of the annual average delivery requirement in the period 2006 to 2021 to 250 dwellings per annum, compared with the actual figure of 252.67.

The table at Paragraph 4.6 of the CSS identifies the source of housing provision that will meet the identified minimum requirements and includes figures for 'Extant Planning Permissions' and 'Existing allocations/other appropriate sites identified in Strategic Housing Land Availability Assessment'. These figures, along with the actual completions within the period are combined to produce the figure for the 'Total without Green Belt release' figure.

Setting aside the concern regarding under-provision associated with the rounding down of the annual average delivery requirement in the period 2006 to 2021, the CSS fails to identify the sites that will contribute to the 'Extant Planning Permissions' provision. The identification of the sites that will contribute to the 'Extant Planning Permissions' should be provided in the context of the findings of the Inspector in the appeal by Asprey Homes [APP/G5180/A/07/2043219/NWF] who determined that the reliance on a delivery rate of 100% is unsafe [IR287].

Furthermore, at the time of writing these representations, the Strategic Housing Land Availability Assessment 2009 has not been published. It is impossible therefore for a full assessment of the proposed housing provision to be undertaken to confirm whether the CSS is 'founded on a robust and credible evidence base' [test of soundness in the table following Paragraph 4.52 of PPS12].

iii. Redevelopment of Employment Sites

Paragraph 4.14 of the CSS refers to the identification of the four employment sites that are considered by the Council to be suitable for redevelopment to residential use. However, the failure to publish the Strategic Housing Land Availability Assessment 2009 either before or alongside the publication of the CSS means that the assumptions made by the Council as to the suitability, availability, viability and deliverability of the sites cannot be assessed.

It has been necessary, therefore, to review the assumptions made in the Rochford Urban Capacity Study 2007 (UCS) regarding the sites. Within the section of the UCS entitled 'Redevelopment of Established Employment Land' [pages 22 & 23] includes a list of those sites assessed, their indicative capacities and the probability of residential development coming forward at the sites within the plan period (identified elsewhere as 2001 - 2021). The list includes the four sites identified in the CSS of Eldon Way/Foundry Estate, Hockley; Rawreth Lane Industrial Estate, Rayleigh; Stambridge Mills; and Star Lane Industrial Estate, Great Wakering.

In total, the UCS identifies an indicative residential redevelopment capacity of 486 units on the four sites (118, 220, 60 and 88 respectively). Of these, it identifies the Rawreth Lane Industrial Estate and Stambridge Mills as having a 'high'

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probability of coming forward for development in the Plan period (2001 - 2021), which would deliver 280 residential dwellings using the Council's own figures. The Star Lane Industrial Estate (referred to in the UCS as the Star Lane Brickworks) is identified as having a 'medium' probability of coming forward for development in the Plan period, with capacity to deliver 88 residential dwellings. It is unclear, therefore, where the figure for 'Existing allocations/other appropriate sites identified in Strategic Housing Land Availability Assessment'.

Set against this is the identification of these four sites in the CSS as being capable of delivery for residential development within the Plan period, with 671 units delivered between 2006 and 2015 and a further 506 units between 2015 and 2021.

The UCS also states in the same section that:

"There are considerable areas of land in the district that are currently allocated for, and in use as, employment land. The redevelopment of such sites for residential use would reduce demand for residential development on greenfield sites, but would at the same time create a need for alternative sites to be found for employment. Such an approach, which would be likely to require the decontamination of existing employment land to make it fit for residential use, together with development of a greenfield site and implementation of additional infrastructure to serve the new employment area, may well be unsustainable." [our emphasis]

The UCS appears to confirm therefore, that not only would the redevelopment of the four sites listed in the CSS be unlikely within the Plan period, but also potentially unsustainable. In this regard, it is notable that the promoters of Stambridge Mills sought the Screening Opinion of the Council as to whether Environmental Impact Assessment of the planning application for the redevelopment of the site for residential use was required in 2007, but to date are yet to submit a planning application for the redevelopment of the site.

In light of this, Colonnade does not consider the CSS is 'the most appropriate strategy when considered against the reasonable alternatives' [test of soundness in the table following Paragraph 4.52 of PPS12], which include the provision of residential development in East Rochford.

iv. Strategic Housing Growth to the East of Rochford

Furthermore, whilst paragraph 2.62 of the CSS identifies concern relating to the identification of locations to the east of Rochford for development on the basis that 'vehicular movements would inevitably be directed through Rochford's historic core', the CSS later identifies Stambridge Mills as a suitable site for residential redevelopment.

In light of the evident conflicts between the evidence base provided in support of the CSS and the absence of other evidence, the CSS is not considered 'sound' in the context of the tests of soundness in the table following Paragraph 4.52 of PPS12.

v. Housing Trajectory

Paragraph 4.28 of the CSS confirms that policies H1, H2 and H3 of the CSS will deliver housing supply as illustrated in the Housing Trajectory at Appendix H2. This Housing Trajectory is transposed from the 2008 Annual Monitoring Report (AMR).

Whilst on the face of it, the Housing Trajectory appears to confirm that the Council can meet its requirement to identify a five year housing supply, many of the sites identified within the AMR do not conform to the guidance issued by CLG in August 2008, on the assessment of a five year land supply. The guidance identifies sites that can be included within the five year assessment of housing supply as:

"those that are allocated for housing in the Development Plan, sites that have planning permission (outline or full planning permission that has not been implemented) and specific, unallocated brownfield sites that have the potential to make a significant contribution to housing delivery during the 5 year period".

Table 4.10: Projected Net Completions of the AMR confirms that the five year housing land supply figure includes sites from 'other land allocated for residential purposes', which are based on land allocations outside existing settlements. However, it should be clarified that these land allocations are not currently allocated for housing development in an adopted Development Plan. As such, these unallocated greenfield sites that are yet to make significant progress through the planning system should be discounted and the five year housing land supply recalculated.

The table below has been prepared to confirm the extent of the shortfall should the sites from 'other land allocated for residential purposes' be removed from the calculation of the Rochford five year housing land supply, in accordance with the guidance issued by CLG:

Recalculated Five Year Housing Land Supply (2009 - 2014):

Year
1st April 2009 to 31st March 2010
Predicted Delivery (A)

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106 dwellings
Allocations on 'other land allocated for residential purposes' (B)
0
Residual delivery (A-B)
106 dwellings
Delivery Shortfall
0

Year
1st April 2010 to 31st March 2011
Predicted Delivery (A)
217 dwellings
Allocations on 'other land allocated for residential purposes' (B)
150
Residual delivery (A-B)
67 dwellings
Delivery Shortfall
150

Year
1st April 2011 to 31st March 2012
Predicted Delivery (A)
544 dwellings
Allocations on 'other land allocated for residential purposes' (B)
300
Residual delivery (A-B)
244 dwellings
Delivery Shortfall
300

Year
1st April 2012 to 31st March 2013
Predicted Delivery (A)
395 dwellings
Allocations on 'other land allocated for residential purposes' (B)
375
Residual delivery (A-B)
20 dwellings
Delivery Shortfall
375

Year
1st April 2013 to 31st March 2014
Predicted Delivery (A)
300 dwellings
Allocations on 'other land allocated for residential purposes' (B)
300
Residual delivery (A-B)
0 dwellings
Delivery Shortfall
300

TOTAL

Predicted Delivery (A)
1,562 dwellings

Allocations on 'other land allocated for residential purposes' (B)
1,125 dwellings

Residual delivery (A-B)
437 dwellings

Delivery Shortfall
1,125 dwellings

The above table confirms that the removal of the 'other land allocated for residential purposes' from the calculation of the Rochford five year housing land supply leaves the Council with a minimum net additional housing delivery of 437 dwellings, which equates to a supply of 1.7 years based on the adjusted annual delivery target of a minimum of 255 net

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additional dwellings per annum. As such, the Council is failing to meet its requirement to demonstrate a five year housing land supply in accordance with PPS3 and the supporting guidance provided by CLG. It is notable that the recent application by David Wilson Homes at Land between Main Road and Rectory Road and Clements Hall Way, Hawkwell identifies an even greater shortfall in the Council's five year housing land supply.

In addition to the above, the AMR does not include a commentary on how deliverability has been assessed against the requirements of paragraph 54 of PPS3.

Furthermore, the guidance from CLG confirms that the windfall sites cannot be relied upon in demonstrating a five year supply unless a Local Planning Authority can demonstrate genuine local circumstances exist to allow this exception. However, the second paragraph of the section entitled 'Housing Trajectory and Five Year Housing Supply' confirms that the estimated completions in the years 2008 to 2013 includes estimated yields through 'intensification' coming forward in future years. With reference to the definition of 'intensification' on page 13 of the AMR, it appears that the 'Housing Trajectory and Five Year Housing Supply' also includes provision for windfall sites. As such, the Council is required to demonstrate the 'genuine local circumstances exist to allow this exception'.

The pressures on delivery and need for additional sites are more acute when it is considered that an average delivery rate of 204 dwellings per annum was achieved during a strong period of housing market growth. In view of the current economic downturn, and significant problems faced within the housing market, the Council should seek to identify appropriate and deliverable sites to meet its regional housing target provision commitments. Suitable sites would include Coombes Farm, which has been positively promoted for development through the LDF process.

It may, therefore, be more appropriate for the Council not merely to allocate sufficient sites to meet the minimum targets set down by the East of England Plan, but to identify a reservoir of land capable of coming forward for development should the sites identified through the CSS and Allocations Development Plan Documents (DPD) fail to come forward for development within the anticipated timescales.

vi. Appendix H1

As set out in the representations to the Preferred Options Core Strategy, there is continuing concern that the list of improvements to infrastructure required in support of residential development as set out in Appendix H1 fails to provide the necessary justification for its inclusion. Whilst the preamble seeks to clarify why the infrastructure is sought, the inclusion of this list should be fully justified, otherwise it is of little value. Furthermore, it would be of benefit to provide further details of the existing community infrastructure provision and capacity within the evidence base.

The failure to provide the necessary justification for its inclusion means that the CSS will not be 'founded on a robust and credible evidence base' [test of soundness in the table following Paragraph 4.52 of PPS12].

d) Character of Place

As set out in the representations to the Preferred Options Core Strategy, Colonnade considers that, with respect to the requirement to produce and adhere to Development Briefs for large residential developments, as set out in Policy CP1, the Council should not seek to impose further demands on developers where existing regulations provide sufficient requirements regarding design. In this instance, Design and Access Statements provide sufficient design guidelines for developments and there is no additional information provided in the policy or supporting text that clearly sets out the justification for this requirement.

e) Green Belt

With reference to the comments regarding the redevelopment of employment sites under the 'Housing' section above and the requirement to allocate sufficient land to meet the minimum housing provision targets as required by the East of England Plan, Colonnade considers that the chapter on Green Belt, and policy GB1 in particular, fails to provide the necessary evidence base that will allow it to be monitored effectively.

It is inherent that the proposed redevelopment of previously developed employment sites for residential use in order to reduce the requirement to allocate previously undeveloped land for residential use will displace these employment uses. In turn, therefore, the separate allocation of previously undeveloped Green Belt to accommodate the compensatory employment provision is required. This is accepted in principle at paragraph 11.11 of the CSS.

Without providing clarification of the anticipated quantum of land required to accommodate the provision of housing and compensatory and new employment land, it is not possible to monitor the performance of policy GB1.

However, using the Council's figures in the table setting out the breakdown of the housing provision figures in Chapter 4 of the CSS (assuming that actual completions and extant permissions are all on previously developed land), setting aside the displacement of employment uses referred to above, approximately 42% of the required minimum housing provision target is capable of being accommodated on previously developed land (2,005 units from a total of 4,750). As such, the Council is required to provide at least 58% of the required minimum housing provision target on the Green Belt (2,745 units from a total of 4,750).

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If these figures are adjusted to take account of the displacement of employment uses (assuming the provision of an equal quantity of land is required to compensate for the employment land that is redeveloped), this figure changes to 17.5% on previously developed land and 82.5% on Green Belt (828 and 3,922 units from a total of 4,750 respectively). Even allowing for the achievement of higher densities of employment on new developments, the figures above are unlikely to change significantly.

Furthermore, the table in Chapter 4 also confirms that no previously developed land will be available for development beyond 2021, or 2015 if account is taken of the displacement of the employment uses.

In light of this, not only does Chapter 6 fail to provide the necessary evidence base that will allow it to be monitored effectively, it is also necessary to consider whether it presents the most appropriate strategy for addressing the required release of Green Belt land to accommodate the defined housing and employment delivery targets to 2025 and beyond as necessary. Colonnade considers a more robust approach that is flexible and capable of being monitored, would be to clearly identify those sites capable of delivery in the short term, which for the avoidance of doubt includes those sites being promoted by Colonnade, with a reservoir of alternative sites set aside for future growth.

As set out in the representations to the Preferred Options Core Strategy, Colonnade considers that the inclusion of an affordable housing exception policy within the CSS will aid the delivery of community housing within rural areas. However, the CSS does not contain such a policy, or adequately address the issue of community housing within rural areas and the CSS is not considered to provide sufficient flexibility to allow for the delivery of essential rural housing.

f) Environmental Issues

Colonnade has concerns regarding the justification for and effectiveness of a number of the policies contained within the Environmental Issues chapter, as follows:

â€¢ Policy ENV1: The Council fails to identify how it will "maintain, restore and enhance" the sites of nature conservation importance that are identified, or how the performance of this policy will be monitored;

â€¢ Policy ENV3: In the context of the advice at paragraph 4.32 of PPS12 regarding the reformulation of national policies, Colonnade does not consider that this policy is required; and

â€¢ Policy ENV9: As set out in the representations to the Preferred Options Core Strategy, Colonnade does not consider that the necessary evidence base has been provided to justify a policy that seeks to go above and beyond the policy targets for the Code for Sustainable Homes as set out by Central Government.

g) Community Infrastructure, Leisure and Tourism

Policy CLT1 refers to the requirement for residential and employment development to contribute to the infrastructure identified in Appendix CLT1 through Standard Charges.

However, whilst the general principle of securing planning obligations through the application of standard charges is broadly accepted, the list of infrastructure requirements set out in Appendix CLT1 is not supported by sufficient evidence base to identify its robustness and credibility. As such, Colonnade does not consider either policy CLT1 or Appendix CLT1 is justified in the context of PPS12.

It is also noted that, despite the clarification sought by Colonnade at the Core Strategy Preferred Options stage, the CSS fails to confirm what information should be contained within Health Impact Assessments, which are required by policy CLT4. Once again, Colonnade requests further clarification of what is involved in the assessment and the expected outputs, which will provide greater clarity and will allow the policy to be monitored.

h) Transport

Policy T8 confirms that the Council will apply minimum parking standards. As set out in the representations to the Preferred Options Core Strategy, the guidance in Planning Policy Guidance Note 13: Transport (PPG13) is clear regarding the imposition of parking standards.

Paragraphs 52-56 of PPG13 confirm that the Local Planning Authorities should apply maximum not minimum parking standards. In order to satisfy the legal requirements set out in PPS12, the policy must reflect PPG13 to promote sustainable transport choices and further provide incentives for developers to locate further residential land closer to local service centres by requiring maximum parking standards for residential developments.

i) Economic Development

As set out in the representations to the Preferred Options Core Strategy, the land at Three Ashes Farm provides an excellent opportunity to deliver employment growth in the short term and may be a suitable site for the 'Eco-Innovation Centre' that is being promoted by the Council. Its identification as a suitable location for strategic employment growth, or the provision of an Eco-Innovation Centre, would accord with the general principles of the policies contained within Chapter 11.

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CHAPTER 10 Policy T8 - Parking Standards

The identification of Purdeys Industrial Estate as fit for purpose (in paragraph 11.32 and the Council's 2008 Employment Land Study 2008) and therefore it should be maintained and if possible expanded, is welcomed and Colonnade considers that Three Ashes Farm could deliver this expansion, providing a natural extension to Purdeys Industrial Estate and being strategically located close to the Airport.

Three Ashes would address the negative impacts that the nearby residential area experiences from the existing Industrial Estate by providing a buffer between established uses and the residential area with less intensive employment activities. The highways analysis that has been carried out has suggested that it would not have an adverse impact on roads and congestion. Furthermore, there are very few opportunities for businesses to expand and Three Ashes could provide this opportunity.

j) Conclusions

Following the submission of representations to the Preferred Options Core Strategy, Colonnade is disappointed to note that the CSS fails to take account of the majority of the issues raised in their representations.

In addition, Colonnade considers the plan to be 'unsound' as the document consistently fails to meet the tests of soundness set out in the table following Paragraph 4.52 of PPS12 and respectfully requests that the Council notifies Icen, on behalf of Colonnade, of the future arrangements for the Examination of the Core Strategy. Furthermore, Colonnade wishes to take this opportunity to formally register a request to appear at all stages of the Examination in Public, including the pre-hearing meeting and any planned hearing sessions whereby issues raised in the context of this letter are to be discussed. Please confirm this request, and that the representations made to the Preferred Options Core Strategy will be taken into account alongside the current representations, by way of return to this letter.

Icen Projects, on behalf of Colonnade Land LLP trusts that the Council will find these representations to be constructive and helpful in taking forward the Core Strategy. Should you wish to discuss any aspect of these representations further, please do not hesitate to contact us.

Summary:

Policy T8 confirms that the Council will apply minimum parking standards. As set out in the representations to the Preferred Options Core Strategy, the guidance in Planning Policy Guidance Note 13: Transport (PPG13) is clear regarding the imposition of parking standards.

Paragraphs 52-56 of PPG13 confirm that the Local Planning Authorities should apply maximum not minimum parking standards. In order to satisfy the legal requirements set out in PPS12, the policy must reflect PPG13 to promote sustainable transport choices and further provide incentives for developers to locate further residential land closer to local service centres by requiring maximum parking standards for residential developments.

Change to Plan

Appear at exam? Yes Soundness Tests i

Core Strategy Submission Document

O - 16390 - 8267 - Policy T8 - Parking Standards - ii, iii

16390 Object

CHAPTER 10 Policy T8 - Parking Standards

Respondent: Aber Ltd [8267]

Aber Ltd
C/o Agent

Agent: Colliers CRE (Mr S Chapman) [8266]

Colliers CRE
9 Marylebone Lane
London
W1U 1HL
020 7344 6533

Full Text: The use of minimum parking standards for residential developments is not only contrary to the advice contained within PPG13, which states that maximum parking standards should be used, but also contradicts the aim to reduce reliance on private vehicle by encouraging residents to have more cars.

It is not considered to be appropriate to just limit parking at destinations, as residents will drive from their homes to the town centre, work place etc, which have maximum parking standards. This will put undue stress on these spaces and result in people parking elsewhere, including on-street and illegally, which could adversely affect traffic flows and road safety.

Summary: The use of minimum parking standards for residential developments is not only contrary to the advice contained within PPG13, which states that maximum parking standards should be used, but also contradicts the aim to reduce reliance on private vehicle by encouraging residents to have more cars.

It is not considered to be appropriate to just limit parking at destinations, as residents will drive from their homes to the town centre, work place etc, which have maximum parking standards. This will put undue stress on these spaces and result in people parking elsewhere, including on-street and illegally, which could adversely affect traffic flows and road safety.

Change to Plan Reword policy as follows:

'Maximum parking standards will be applied to all forms of development, however, within accessible locations (e.g. town centres or areas that have high levels of public transport accessibility), a relaxation of these standards may be appropriate. As part of the overall parking provision, all new developments shall contain conveniently located reserved spaces for disabled persons in accordance with the Council's adopted car parking standards.

In addition, all developments should provide adequate provision for the parking, turning, loading and unloading of service vehicles.'

Appear at exam? No

Soundness Tests ii, iii

Core Strategy Submission Document

16618 Object

CHAPTER 10 Policy T8 - Parking Standards

Respondent: Fairview New Homes Ltd [5219]

Fairview New Homes Ltd
50 Lancaster Road
Enfield
Middlesex
EN2 0BY
020 83661271

Agent: Planning Potential (Miss G Brickwood) [7549]

Planning Potential
Palace House
3 Cathedral Street
London
SE1 9DE
0207 357 8000

Full Text: Representations on behalf of Fairview New Homes

1. We are instructed by our client, Fairview New Homes, to submit comments on the published Core Strategy Submission Document. For ease specific reference has been made in accordance with the paragraph and policy numbers as contained in the published document. We would like the opportunity to represent our Client at the forthcoming Examination of the Core Strategy DPD and would be grateful for confirmation that this is possible.

2. Fairview New Homes have an interest in a parcel of land to the South West of Rayleigh Town Centre, as indicated on the attached site location plan. This land was previously identified in the Core Strategy Preferred Options documents to provide an urban extension to the south west of Rayleigh. This option has now been withdrawn in the Core Strategy Submission document and it is on this basis these representations are provided to the Council.

3. The Submission Core Strategy has been considered against the requirements set out at Paragraph 4.36 of PPS12 requiring core strategies to be justifiable and effective in order to be found sound, as follows:

Justified:

- i. Founded on a robust and credible evidence base
- ii. The most appropriate strategy when considered against the reasonable alternatives

Effective:

- i. Deliverable - the Core Strategy should show how the vision, objectives and strategy for the area will be delivered and by whom, and when, including who is responsible for implementing different elements of the strategy and when
- ii. Flexible - a strategy is unlikely to be effective if it cannot deal with changing circumstances. Plans should show how they will handle contingencies.
- iii. Able to be monitored - monitoring is essential for an effective strategy and will provide the basis on which the contingency plans within the strategy would be triggered.

4. To summarise our comments, Fairview New Homes strongly object to the Core Strategy as is currently presented on the basis the document is currently unsound for a number of reasons:

â€¢ The lack of robust and credible evidence base

â€¢ Failure to clearly discount reasonable alternatives

â€¢ The effectiveness of the plan is also considered to be flawed and the Council's approach to deliverability and flexibility is questioned.

5. Fundamentally, we question the soundness of the Core Strategy due to the lack of available evidence to support the choices made by the Council. In particular, there is a strong reliance on the findings of the 2009 Strategic Housing Land Availability Assessment (SHLAA) although it is understood this document is not due to be published for consideration alongside the Core Strategy. We, therefore, reserve the right to submit additional comments to the Core Strategy consultation following the publication of the SHLAA.

6. The 2009 SHLAA is clearly listed at Paragraph 1.29 of the submission Core Strategy as one of the evidence base documents the Council have drawn upon when drafting the Core Strategy. The documents listed are all considered to have played an important role in informing the Core Strategy. PPS12 also recognises at Paragraph 4.37 the importance of demonstrating how choices made in the plan are backed up by factual evidence identified in evidence base documents.

7. As a starting point it is important to state it is Fairview New Homes greatest concern there is no background provided within the Core Strategy document, or indeed any of the available evidence base documents, identifying why the Local Planning Authority has chosen to remove some of the sites previously proposed for housing development. In addition, there is also no justification as to why the retained urban extension sites are more suitable than those removed from the draft plan.

8. The following provides specific comments in response to the relevant areas of the Core Strategy.

Housing

9. It is stated at Paragraphs 4.10-4.12 that the Council have adopted a balanced approach when locating new housing between higher tier settlements and lower tier settlements. Although there is no detail provided as to how the Council

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CHAPTER 10 Policy T8 - Parking Standards

intend on implementing this balanced approach or how the strategic allocation of housing contributes to the balance required. Our Client cannot support this approach until further detail is understood as to the proportion of housing being allocated to each settlement tier.

10. The proposed distribution of housing development during the plan period does not appear to be proportionately allocated between the various settlement tiers. We would argue that development should be distributed proportionately in line with the size of the settlement in order to benefit for available services and facilities. Rayleigh recognised as having best access to services within the district at Paragraph 2.68 of the Core Strategy. On this basis it is considered the development should primarily be directed to Rayleigh with a proportionate level of housing to the remaining settlements in the District.

Policy H1 - The efficient use of land for housing

11. In general the use of residential extensions to meet the remaining housing requirement that cannot be delivered through the redevelopment of appropriate previously developed land is supported by Fairview New Homes.

12. It is understood there is a need to prioritise use of brownfield land in line with national policy requirements but this needs to be a carefully balanced and realistic approach in identifying appropriate urban extensions to accommodate the majority of the District's housing, as identified in the table at Paragraph 4.6 and later at Paragraph 4.15.

13. Policy H1 sets out that the Council will seek the redevelopment of Rawreth Lane Industrial Estate, Foundry Industrial Estate, Stambridge Mills and Star Lane Industrial Estate. Without sight of the 2009 SHLAA it is not possible to understand whether the Council's choice to release employment land for housing is appropriate and Fairview New Homes cannot, therefore, support this element of Policy H1. This objection is further amplified by the fact additional employment land is required but is yet to be identified.

Policy H2 - Extensions to residential envelopes and phasing

14. The Council's intention to provide a balanced strategy for housing provision is mentioned again at Paragraph 4.18. The comments made at Paragraphs 9 and 10 above are also relevant in this respect.

15. In comparing the Preferred Options Core Strategy Document and Submission Core Strategy Document there is a significant reduction in the number of housing units being provided in urban extensions pre 2015, from 1450 dwellings to 775. From discussions with the Local Planning Authority it is understood the Council are seeking to provide the District's housing requirements by increased development densities. From the evidence available in the Submission Core Strategy and summary of SHLAA sites a number of the sites identified as urban extensions have in fact been allocated a reduced number of dwellings, including the land to the north of London Road, Rayleigh. We would, therefore, consider the approach taken by the Local Planning Authority to provide the required level of housing is untenable and unjustified.

16. In discounting preferred options PPS12 makes clear at Paragraph 4.38 the requirement for Local Planning Authorities to consider and evaluate reasonable alternatives. As set out above, the choices the Council have pursued have not been substantiated and without the consideration of reasonable alternatives the Core Strategy cannot be considered justified and therefore unsound.

17. However, this is our opinion based only on discussions with the Local Planning Authority rather than a thorough evidence base and we will consider the evidence in detail when it become available and provide further comment.

18. Paragraph 4.19 of the draft Core Strategy details the Council's primary factors in determining the location of future urban extensions. It is presumed the Council have assessed each of the proposed urban extension sites against the following criteria and that this information is contained within the SHLAA, although we have not been provided with any evidence of this to assess. It can be demonstrated that the land identified on the attached site location plan meets all of the requirements set out below.

â€¢ The proximity and relationship to existing centres, facilities, services

â€¢ The availability of infrastructure and/or the potential for additional infrastructure to be provided for development in such areas

â€¢ The potential to reduce private car dependency

â€¢ The potential to avoid areas of constraint (such as areas at risk of flooding, sites of ecological importance, public safety zone etc)

â€¢ The historical, agricultural and ecological value of land

â€¢ The impact on highway network (including availability and impact on existing network, as well as potential for improvements to be delivered)

â€¢ The relationship of development locations to the District's area of employment growth

â€¢ The potential to create a defensible Green Belt boundary

â€¢ The avoidance of coalescence with neighbouring settlements

19. In summary, Fairview's land is sustainably located in particularly close proximity to Rayleigh Town Centre and train station. In addition, the location of the land provides a natural extension and rounding of settlement boundary. An extension to Rayleigh in this location offers no opportunity for coalescence with neighbouring settlements nor does it constitute urban sprawl.

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CHAPTER 10 Policy T8 - Parking Standards

Policy H2 - Extensions to residential envelopes and phasing

20. Although it is stated a flexible approach to the timings of the release of land will be maintain no explanation is provided as to why some sites are considered suitable for development pre 2015 and others post 2015. Paragraph 4.22 elaborates further to state a number of factors have been considered when determining the phasing of strategic housing sites although this information is not clearly available to assess.

21. As stated above the principle of releasing certain areas of greenbelt land is considered the best approach to meeting the Council's housing provision requirements. However, Fairview New Homes object to the omission of the land to the South West of Rayleigh for housing development as previously identified in the Core Strategy Preferred Options document. The site identified on the attached site location plan has been assessed against the Council's criteria, as set out at Paragraph 18 above and each requirement can be met. Without any clear explanation as to why this site has been discounted and the only other strategic housing site identified in Rayleigh is located further away from Rayleigh Town Centre and the associated services and facilities including the train station, Fairview New Homes object to Policy H2.

22. As considered at the outset of these representations the draft Core Strategy cannot be considered robust, and therefore sound, without clear justification and evidence base.

Policy H3 - Extension to residential envelopes post-2021

23. Policy H3 is supported on the basis that the release of greenbelt land is required for housing and this is the most appropriate approach to meet the Council's housing requirements, as set out at Paragraph 21 above.

24. However, it is unclear why some of the sites previously identified for housing development pre 2015 up until 2021 in the Preferred Options Core Strategy document have now been allocated for development post 2021, such as South East Ashingdon. It is stated at Paragraph 4.24 of the Submission Core Strategy document those areas identified for post 2021 development may not be immediately deliverable. However, there is no information available to understand why these sites are now no longer considered suitable for pre 2015 development as they were in December 2008. As a result, Fairview New Homes consider Policy H3 to be unjustified and therefore unsound.

Affordable Housing

25. The acute need for additional affordable housing is recognised at Paragraph 4.30. It is unclear from the draft Core Strategy document exactly how much affordable housing is required in the District in the plan period.

26. However, taking the starting point as set out at Paragraph 4.30 that the Thames Gateway South Essex Strategic Housing Market Assessment requires 131 net additional affordable dwellings per year which constitutes 52% of the District's overall annual housing target. In order to achieve this target using the Council's proposed policy requirement that new housing developments are to provide 35% affordable housing, 375 new dwellings would need to be developed each year. This calculation does not account for those developments with fewer than 15 dwellings which have no requirement to provide affordable housing or developments which cannot viably afford to provide non-market housing.

27. An annual requirement of 250 dwellings is identified at Paragraph 4.2 of the Core Strategy which would leave a significant short fall of affordable housing and act to compound the current situation. The approach taken by the Council ultimately accepts there will always be a shortfall in affordable housing provision and does not seek to redress this. We do not, therefore, consider this to be a robust or justified approach to achieving affordable housing in the District.

28. It is, therefore, considered in order to meet the District's affordable housing requirement additional housing land should be identified in order to ensure a wholesale increase in housing provision to address the Council's shortfall in affordable housing and meet the targets set for the plan period. The most appropriate and effective method by which to secure affordable housing provision is through developing large sites that are viably able to offer affordable housing units.

29. During the consultation of the submission Core Strategy the Council's Housing Strategy (2009) was not available and we reserve the right to make further comment on this document following the publication of this evidence.

The Green Belt

30. It is fully accepted by the Council that the Green Belt boundary is currently too tightly drawn and the release of some Green Belt land is necessary to meet the District's development requirements. However, it needs to be demonstrated that the areas of Green Belt land to be lost are justified and located in the most appropriate area and that areas of release land do not undermine the principle of the Green Belt.

31. It is understood from Paragraph 6.7 of the Submission Core Strategy the Council will seek to examine the degree to which current Green Belt land is helping to achieve the purposes of the Green Belt when considering reallocating land. However, areas of Green Belt are proposed to be reallocated for urban extensions prior to this research being undertaken.

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32. Fairview New Homes fully support the justified retention of the areas of Green Belt where appropriate and the release of Green Belt land where needed. However, at present the proposed Housing policies and Green Belt policies are not coherent and the reallocation of certain areas of Green Belt is not based on a credible evidence base.

Environmental Issues

Policy ENV4 - Sustainable Drainage Systems (SUDS)

33. Fairview New Homes would like to support the flexibility contained within Policy ENV4 which recognises it is not always viably possible to incorporate SUDS in all developments.

Policy ENV8 - On Site Renewable and Low Carbon Energy Generation

34. We would also like to support Policy ENV8 on the same basis as Policy ENV4 in that it is important that the production of energy from renewable or low carbon sources is only required where it is viably possible so as not to resulting in developments not coming forward.

Transport

Policy T8 - Parking Standards

35. Fairview New Homes object to Policy T8 as it is currently contrary to National Policy requirements as set out in PPG13 which contains maximum parking standards. Indeed, this is recognised at Paragraph 10.27 of the Submission Core Strategy document. Enforcing minimum parking standards is not consistent with local or national sustainability aims and should not be an approach pursued by the Council.

Summary:

Transport

Policy T8 - Parking Standards

35. Fairview New Homes object to Policy T8 as it is currently contrary to National Policy requirements as set out in PPG13 which contains maximum parking standards. Indeed, this is recognised at Paragraph 10.27 of the Submission Core Strategy document. Enforcing minimum parking standards is not consistent with local or national sustainability aims and should not be an approach pursued by the Council.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i, ii

Core Strategy Submission Document

S - 16893 - 8329 - Policy T8 - Parking Standards - None

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CHAPTER 10 Policy T8 - Parking Standards

Respondent: Swan Hill Homes Limited [8329]

Swan Hill Homes Limited
C/O Agent
Mr P Kneen
Charles Planning

Agent: Charles Planning Associates Ltd (Mr P Kneen) [5040]

Charles Planning Associates Ltd
1644-1645 Parkway
Solent Business Park
Whiteley
Fareham
Hampshire
PO15 7AH
01489 580853

Full Text:

1.0 Instruction and Introduction

1.1 Charles Planning Associates Limited (Chartered Town Planners) is Instructed by Swan Hill Homes Limited (Swan Hill) to prepare and submit representations on their behalf in respect of the Rochford District Local Development Framework: Core Strategy Submission (September 2009) Development Plan Document.

1.2 The comments refer to the relevant sections and policy designations in the Submission document, as appropriate.

1.3 The comments set out in this submission are intended to assist the District Council in taking forward its Local Development Framework. It is our intention to continue to be involved in the LDF preparation process and we look forward to the opportunity to comment further at the Examination to the Core Strategy.

1.4 If you have any queries regarding the content of this submission then please do not hesitate to contact:

Peter Kneen BSc (Hons) MSc MRTPI
Planner

2.0 Housing:
Policy H1 - The Efficient Use of Land for Housing

2.1 Swan Hill recognises the importance of seeking to concentrate new developments mainly in the existing urban areas, on previously developed land where possible, particularly in view of the Government seeking to ensure 60% of all such new developments are on previously development land (PDL).

2.2 However, given the character of the District, and the strategic housing requirement of the East of England Plan, Swan Hill supports the approach that the Council must also make provision for additional development on the edge of existing settlements on greenfield sites, particularly in the most sustainable locations. As such, Swan Hill supports that where feasible, the redevelopment of existing employment sites for residential/employment purposes can make a contribution towards the strategic housing requirement, provided that sufficient additional employment land is brought forward to ensure the stability of employment levels in the District, and to ensure employment growth meets the East of England Plan requirements.

2.3 Swan Hill considers that Policy H1 should include consideration that new extensions to existing settlements have regard to their potential impact on the wider characteristics and openness objectives of the Green Belt.

Policy H2 - Extensions to Residential Envelopes and Phasing

2.4 Swan Hill generally supports the approach taken by the Council in this policy. As set out above, Swan Hill consider the Council's acknowledgment that housing requirements should be met through the allocation of land on the edge of the existing settlements is the most suitable way forward to meeting the Council's strategic housing requirement and complies with the advice in PPS3.

2.5 The need for suitable greenfield urban extensions represents the best way forward for the Council to meet its strategic housing requirement, as set out in the East of England Plan. Swan Hill supports the recognition that the potential supply of alternative previously developed sites is limited, without detrimentally affecting the character of the District, and therefore the best way forward is the use of sustainable greenfield urban extensions to the existing settlements of the District.

2.6 However, Swan Hill consider that a fundamental consideration that the District Council should consider relates to the potential impact of the urban extensions on the Green Belt policy has been somewhat overlooked. The wider sustainability credentials of the settlements of the District should only be one of many key considerations for determining the level of expansion. In view of the proximity of Southend-on-Sea to all the main settlements of the District, and the influence this has on the likely location many people would travel for employment and leisure, sustainability of many of the settlements is not a key overarching factor, and greater weight should be placed on the potential impact on the openness of the Green Belt, as this cannot be remedied if development occurs in the wrong location.

2.7 As such, Swan Hill considers that determining the location of growth for the main settlements should be to identify

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CHAPTER 10 Policy T8 - Parking Standards

those locations where the impact on the wider setting of the Green Belt can be minimised. Further justification for those general locations chosen should be identified in Policy H2. In this regard, Swan Hill has serious concerns regarding the removal of Land South West of Great Wakering as a viable option for the growth of the settlement. The development of this area of Great Wakering, in addition to the potential redevelopment of the Star Lane Industrial Estate could provide a more comprehensive development, whilst ensuring that the wider openness of the Green Belt is maintained. Land South West of Great Wakering is significantly better placed to limit the impact on the wider Green Belt than Land West of Great Wakering, and could contribute to the provision of an important amenity and wildlife site for the local community.

2.8 In addition, Swan Hill consider that the Council now has no reserve provision in the event that any of the existing employment sites set out in Policy H1 fail to come forward for development within the envisaged timescale. Further, Land West of Great Wakering has not been identified in the SHLAA as a deliverable site to help meet the strategic housing requirement, contrary to the requirement set out in PPS3.

2.9 As such, Swan Hill would support the provision of suitable sites which could be safeguarded for future development in the likelihood of a shortfall in supply.

Policy H3 - Extensions to Residential Envelopes Post 2021

2.10 As set out above, Swan Hill supports the overall approach the Council has taken towards the provision of sustainable urban extensions as a suitable means of meeting their strategic housing requirement. However, as set out for Policy H2 above, Swan Hill has serious concerns regarding the removal of several proposed sites set out in the October 2008 Preferred Options Core Strategy, without any guarantee of the ability to deliver those sites set out in Policy H1.

2.11 As also considered above, the inclusion of West of Great Wakering for 250 dwellings should not be included ahead of South West of Great Wakering, in view of the fact that the site is not identified in the SHLAA as available, suitable and achievable as required by PPS3, and thus is not supported by a robust and creditable evidence base for its inclusion as a strategic site for development.

2.12 Whilst Swan Hill acknowledge that alterations to Policy H1 has resulted in the removal of some locations for growth in Policy H3 (as set out in the Sustainability Appraisal), Swan Hill does not consider that the most appropriate locations have been chosen.

2.13 In addition to the matters raised above, the use of West of Great Wakering would also result in the loss of valuable agricultural land, which clearly in a Green Belt location, should be less suitable for development than other sites, such as South West of Great Wakering, which would have limited impact on the wider Green Belt policy, and not result in the loss of valuable agricultural land.

2.14 Finally, in respect of Policies H1, H2 and H3, all of the above comments are based on our interpretation of the Submission Version Core Strategy when compared to the October 2008 Version of the Core Strategy. Without the ability to undertake a detailed assessment of the Council's SHLAA, it is not possible to clarify the proposed Core Strategy position regarding the proposed direction of growth proposed for the settlements in the District. As such, Swan Hill reserves the right to make additional representations regarding the proposed Policies H1, H2 and H3 following the publication of the SHLAA in due course.

Policy H4 - Affordable Housing

2.15 In general terms, Swan Hill supports the approach taken by the Council towards the provision of affordable housing for new residential developments. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H5 - Dwelling Types

2.16 Swan Hill supports the policy provision of H5, and considers that the approach taken by the Council for this policy represents a suitably flexible alternative to stipulating percentages of dwelling mix, sought by some local authorities. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H6 - Lifetime Homes

2.17 In regard to this policy, Swan Hill objects to the Council's policy where all new dwellings should be provided to the Lifetime Homes Standard. Whilst it is acknowledged that the UK has an aging population, Swan Hill considers that seeking to provide Lifetime Homes on all sites is considered to be overly onerous for proposed developers, particularly when considering the requirement for all car parking spaces to be suitable for disabled users, which could result in more schemes becoming unviable. Therefore, the provision of a percentage of Lifetime Homes should be considered through negotiations with the Council at the planning application stage, and should be determined on a case-by-case basis.

3.0 Character of Place: Policy CP1 - Design

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CHAPTER 10 Policy T8 - Parking Standards

3.1 The Town and Country Planning (General Development Procedure) Order 1995 (As Amended) makes the submission of a Design and Access Statement for most types of planning applications a Statutory requirement, and as such, the provision of a Design Brief represents a pre-requisite of all major planning applications.

3.2 Policy CP1 seeks to ensure the provision of good, high quality developments that reflect local characteristics and distinctiveness, this ideology is supported by Swan Hill.

4.0 The Green Belt:
Policy GB1 - Green Belt Protection

4.1 Following the amendments to the wording of the Policy since the October 2008 Preferred Options Core Strategy, Swan Hill is now generally supportive of Policy GB1 and its supporting text. However, as expressed above, it is important that where alterations to the Green Belt boundary occur as a result of the extension of the settlements to meet the strategic housing requirement, both the minimal amount of land is taken and where that land is taken for development, it represents the best available land which has a minimal impact of the wider openness characteristic of the Green Belt.

5.0 Environmental Issues:
Policy ENV3 - Flood Risk

5.1 Swan Hill generally supports the approach set out in Policy ENV3 regarding ensuring development accords with the sequential test of PPS25. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV4 - Sustainable Drainage Systems (SUDS)

5.2 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV4. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV8 - On-site Renewable and Low Carbon Energy Generation

5.3 Whilst Swan Hill recognises the importance of reducing carbon emissions, particularly in new housing developments, and the role this can play in reducing the nations overall Greenhouse emissions. As such Swan Hill is generally supportive of Policy ENV8. It is noted that Policy ENG1 of the East of England Plan sets out a threshold of developments comprising 10 or more dwellings. Swan Hill consider it important for the District Council to justify the reduction in the threshold level.

5.4 Further, no assessment of Policy ENV8 has been set out in the Sustainability Appraisal which justifies the change in threshold from that of Policy ENG1 of the RSS.

Policy ENV9 - Code for Sustainable Homes

5.5 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV9. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

6.0 Community Infrastructure, Leisure and Tourism:
Policy CLT1 - Planning Obligations and Standard Charges

6.1 Swan Hill generally supports the overall approach the Council has taken in Policy CLT1. It is considered Policy CLT1 sets out a degree of flexibility to ensure that all sites are considered on a site-by-site basis, assessing the individual merits of each planning application, in order to ensure the levels of contributions applicable meet the five tests of Circular 05/05. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policies CLT5 - Open Space;
CLT7 - Play Space;
CLT8 - Youth Facilities; and,
CLT10 - Playing Pitches

6.2 Swan Hill supports the need for new residential developments to incorporate a degree of new publicly accessible open space, children's play space, youth facilities and playing pitches, and as such, generally supports the policy approaches taken by the Council.

6.3 However, it is important that whilst the Council may seek to undertake an assessment of providing standard charges for new development, which, as set out in Policy CLT1, this should be based on thorough public consultation and consideration and sound justification. Swan Hill consider that within the provision of a standard charge, it is important that such provision allows for a degree of flexibility to ensure that each site is assessed individually and on its own merits. This is particularly important for those sites close to existing open spaces and facilities. As such, the levels of

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CHAPTER 10 Policy T8 - Parking Standards

open space and recreation facilities required in the 'standard charge' should be based on an up-to-date PPG17 Open Space assessment, which should be used to form a key consideration in the levels of provision likely to be required in the standard charge system proposed.

7.0 Transport: Policy T1 - Highways

7.1 Swan Hill supports the overall objectives set out in Policy T1 requiring developments to be located and designed to reduce the reliance on the private car and to meet the infrastructure needs generated by development or seek to help achieve these needs is acceptable in principle.

7.2 Swan Hill recognises the importance of providing sufficient infrastructure provision to meet the requirements of development, and that where developments have insufficient consideration of impact on existing infrastructure, they should be considered unacceptable and contrary to National policy guidance. However, Swan Hill considers it important to emphasise that the developer's role should not be seen as a means to meet existing shortfalls in provision.

Policy T3 - Public Transport

7.3 Swan Hill is generally supportive of the policy approach set out in T3, however, as set out in paragraph 7.2 above, it is important that the District Council do not consider that it is the developer's responsibility to resolve existing shortfalls in provision of public transport, and any contribution towards additional public transportation provision should only be to mitigate against the additional level of demand likely from the development proposed.

Policy T5 - Cycling and Walking

7.4 Swan Hill supports the general approach to this policy, as Swan Hill recognises the importance of promoting the use of alternatives to the private car. The policy provision acknowledges the need to ensure relevant contributions in the event of additional travel demands generated by individual developments, whilst also setting out additional aspirations for the cycle network in the District.

7.5 As such, Swan Hill considers this policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy T8 - Parking Standards

7.6 The Council has recently (January 2007) adopted SPD on the requirements for parking standards, and as such, Swan Hill generally supports the policy approach chosen by the Council. As set out in the SPD, whilst Swan Hill generally supports the approach taken by the District Council towards setting residential parking standards, in that the Council has recognised that in the suburban areas, even with some access to public transport, the majority of residents will rely on the use of private cars. However, Swan Hill has concerns over the failure of the District Council to comply with the provisions of PPG13: Transport (2001) which sets out that Local Planning Authorities should not set minimum standards for car parking. Whilst it is acknowledged that PPS3 sets out provision for the consideration of local circumstances, it is considered that the Council has not justified this deviation from PPG13's maximum standard.

7.7 Whilst it is acknowledged that such justification may become apparent through the work currently being undertaken by Essex County Council, until such time, the District Council should only seek to apply the maximum standards indicated in PPG13. However, Swan Hill recommends that the District Council make provisions in the wording of the Policy to allow for changes in the event that future policy on car parking standards need to reflect the County standard, following the completion of the County Council review.

8.0 Economic Development: Policies ED3 - Existing Employment Land ED4 - Future Employment Allocations

8.1 In respect of Policies ED3 and ED4, Swan Hill notes that they have changed considerably since the October 2008 Preferred Options document, in that they are site specific regarding the location of the proposed redevelopment of existing employment sites. These four sites are also identified in Policy H1 - Efficient Use of Land, and in general, Swan Hill supports the approach to the redevelopment of these sites (where feasible) based on the assessments of the sites set out in this version of the Core Strategy.

8.2 However, Swan Hill has concerns that these policies might not be considered suitably sound given that insufficient opportunity has been allocated for consultation on their redevelopment. Without the SHLAA being publically available prior to the consultation on this Core Strategy, an insufficient evidence base has been provided to corroborate that these sites are neither suitable or deliverable to meet the test of soundness requirements.

Summary:

Policy T8 - Parking Standards

7.6 The Council has recently (January 2007) adopted SPD on the requirements for parking standards, and as such, Swan Hill generally supports the policy approach chosen by the Council. As set out in the SPD, whilst Swan Hill

Core Strategy Submission Document

S - 16893 - 8329 - Policy T8 - Parking Standards - None

16893 Support

CHAPTER 10 Policy T8 - Parking Standards

generally supports the approach taken by the District Council towards setting residential parking standards, in that the Council has recognised that in the suburban areas, even with some access to public transport, the majority of residents will rely on the use of private cars. However, Swan Hill has concerns over the failure of the District Council to comply with the provisions of PPG13: Transport (2001) which sets out that Local Planning Authorities should not set minimum standards for car parking. Whilst it is acknowledged that PPS3 sets out provision for the consideration of local circumstances, it is considered that the Council has not justified this deviation from PPG13's maximum standard.

7.7 Whilst it is acknowledged that such justification may become apparent through the work currently being undertaken by Essex County Council, until such time, the District Council should only seek to apply the maximum standards indicated in PPG13. However, Swan Hill recommends that the District Council make provisions in the wording of the Policy to allow for changes in the event that future policy on car parking standards need to reflect the County standard, following the completion of the County Council review.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 15945 - 9032 - Vision - None

15945 Support

CHAPTER 11 Vision

Respondent: Essex Chambers of Commerce (Mr John Dallaway) **Agent:** N/A
[9032]

Essex Chambers of Commerce
2nd Floor,
Viscount House,
London Southend Airport, Southend-on-Sea.
Essex.
SS2 6YF
01702-560100

Full Text: Essex Chambers of Commerce supports the Vision for Economic Development in particular securing the long term future of Baltic Wharf as an employment area and the full development of London Southend Airport and its environs as an economic driver for the regeneration of the sub-region.

Summary: Essex Chambers of Commerce supports the Vision for Economic Development in particular securing the long term future of Baltic Wharf as an employment area and the full development of London Southend Airport and its environs as an economic driver for the regeneration of the sub-region.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

16391 Object

CHAPTER 11 Introduction, 11.6

Respondent: Aber Ltd [8267]

Aber Ltd
C/o Agent

Agent: Colliers CRE (Mr S Chapman) [8266]

Colliers CRE
9 Marylebone Lane
London
W1U 1HL
020 7344 6533

Full Text:

In order to reduce the amount of Green Belt land released for residential, the Council are proposing to reallocate a number of existing employment sites for either residential or mixed use proposals.

However, in order to meet the number of jobs required in the RSS, additional employment sites will be required, as the supply of employment land within the District is tight, this will require the release of Green Belt land.

The Employment Land Study recommends that any de-allocations of employment land be compensated for by the allocation of 18 hectares of new employment sites.

The idea of not releasing land for residential and then releasing it for employment purposes is a contradiction, as it still requires the release of Green Belt.

Amend Second Sentence of Paragraph 11.6:

'...The Council consider it necessary to review some of these allocations, particularly in light of changes to the economy and the decline of the manufacturing sectors. As part of this review existing employment sites, where these sites are in sustainable locations, they will be protected to ensure that they continue to provide employment generated opportunities, including the redevelopment for other employment uses. Only in instances when the site offers both outdated accommodation and is not located in a sustainable location, will it be considered for mixed use, residential development, and/or community uses.'

Reword Paragraph 11.11:

'In order to address the recommendations of the Employment Land Study an assessment should be made of the existing employment sites, in conjunction with the requirement for new housing to consider whether any of the existing employment land should be de-allocated, and if so whether any new employment sites should be allocated.'

Summary:

In order to reduce the amount of Green Belt land released for residential, the Council are proposing to reallocate a number of existing employment sites for either residential or mixed use proposals.

However, in order to meet the number of jobs required in the RSS, additional employment sites will be required, as the supply of employment land within the District is tight, this will require the release of Green Belt land.

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The idea of not releasing land for residential and then releasing it for employment purposes is a contradiction, as it still requires the release of Green Belt.

Change to Plan

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Appear at exam? No

Soundness Tests ii

Core Strategy Submission Document

16392 Object

CHAPTER 11 Introduction, 11.11

Respondent: Aber Ltd [8267]

Aber Ltd
C/o Agent

Agent: Colliers CRE (Mr S Chapman) [8266]

Colliers CRE
9 Marylebone Lane
London
W1U 1HL
020 7344 6533

Full Text:

In order to reduce the amount of Green Belt land released for residential, the Council are proposing to reallocate a number of existing employment sites for either residential or mixed use proposals.

However, in order to meet the number of jobs required in the RSS, additional employment sites will be required, as the supply of employment land within the District is tight, this will require the release of Green Belt land.

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Summary:

In order to reduce the amount of Green Belt land released for residential, the Council are proposing to reallocate a number of existing employment sites for either residential or mixed use proposals.

However, in order to meet the number of jobs required in the RSS, additional employment sites will be required, as the supply of employment land within the District is tight, this will require the release of Green Belt land.

The Employment Land Study recommends that any de-allocations of employment land be compensated for by the allocation of 18 hectares of new employment sites.

The idea of not releasing land for residential and then releasing it for employment purposes is a contradiction, as it still requires the release of Green Belt.

Change to Plan

Reword Paragraph 11.11:

'In order to address the recommendations of the Employment Land Study an assessment should be made of the existing employment sites, in conjunction with the requirement for new housing to consider whether any of the existing employment land should be de-allocated, and if so whether any new employment sites should be allocated.'

Appear at exam? No

Soundness Tests ii

Core Strategy Submission Document

S - 15709 - 4933 - Employment Growth, 11.19 - None

15709 Support

CHAPTER 11 Employment Growth, 11.19

Respondent: Mr & Mrs Cooper [4933]

11 Spencers
Hawkwell
Essex
SS5 4LW

Agent: N/A

Full Text:

Area has a rich pool of well educated and skilled workers who mainly commute out of area to work (68% per this document). This needs to be addressed by looking for ways to attract high value job creating businesses. The airport development will help here. Can we initiate ideas to make the district attractive for London City based businesses to relocate with affordable, high quality premises and good transport links -- (this worked well along Victoria Ave in 60's but what went wrong???)

Need to engage newly retired highly skilled and professional workers (eg from Ford Motor Co and City) in worthwhile voluntary work but this needs to be organised in a professional way- currently very peicemeal and disjointed.

Summary:

Area has rich pool of well educated and skilled workers who mainly commute out of area to work (68% per this document). Need to attract high value job creating businesses. The airport development will help here. Need ideas to make the district attractive for London City based businesses to relocate with affordable, high quality premises and good transport links -- (this worked on Victoria Ave in 60's - what went wrong)

Third Sector - To engage newly retired highly skilled and professional workers in worthwhile voluntary work. needs a coordinated approach to needs and recruitment - currently peicemeal/disjointed.

Change to Plan N/A

Appear at exam? Not Specified

Soundness Tests N/A

Core Strategy Submission Document

S - 15946 - 9032 - Policy ED1 - Employment Growth - None

15946 Support

CHAPTER 11 Policy ED1 - Employment Growth

Respondent: Essex Chambers of Commerce (Mr John Dallaway) **Agent:** N/A
[9032]

Essex Chambers of Commerce
2nd Floor,
Viscount House,
London Southend Airport, Southend-on-Sea.
Essex.
SS2 6YF
01702-560100

Full Text: Support Policy ED1 for Employment Growth but would suggest that the importance of tourism to the District should not be underestimated and its development should be included as an activity for support by the Council.

Summary: Support Policy ED1 for Employment Growth but would suggest that the importance of tourism to the District should not be underestimated and its development should be included as an activity for support by the Council.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16063 - 14107 - Policy ED1 - Employment Growth - None

16063 Support

CHAPTER 11 Policy ED1 - Employment Growth

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: We agree with this policy. We strongly support the development of a skills training academy. This needs to be given HIGH PRIORITY

Summary: We agree with this policy. We strongly support the development of a skills training academy. This needs to be given HIGH PRIORITY

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16139 - 13096 - Policy ED1 - Employment Growth - i, ii

16139 Object

CHAPTER 11 Policy ED1 - Employment Growth

Respondent: Mr Alan West [13096]

37 Woodlands Road
Hockley
Essex
SS5 4PL
United Kingdom

Agent: N/A

Full Text: There is a high level of public opposition to the expansion of Southend Airport. It may not therefore go ahead, so it is unsound to base future employment policy on it.

Summary: There is a high level of public opposition to the expansion of Southend Airport. It may not therefore go ahead, so it is unsound to base future employment policy on it.

Change to Plan Qualify or remove reference to airport.

Appear at exam? No

Soundness Tests i, ii

Core Strategy Submission Document

S - 16185 - 12008 - Policy ED1 - Employment Growth - None

16185 Support

CHAPTER 11 Policy ED1 - Employment Growth

Respondent: EEDA (Mrs Juliet Richardson) [12008]

Agent: N/A

EEDA
The Business Centre
Station Road
Histon
Cambridge
CB4 9LQ
UK
01223 484632

Full Text:

The Core Strategy identifies that Rochford has a small but productive and enterprising economy albeit with an employment market of basic and intermediate skills, rather than high skills. A significant proportion of the Rochford workforce commute of the district however the location of Southend Airport has the potential to be a focus and catalyst for economic growth. EEDA support policy ED1 which seeks to diversify and modernise the economy through the growth of existing new business providing high value employment.

By addressing these key elements of the Regional Economic Strategy, the Core Strategy will provide the context needed to maintain the prosperity of the East of England, enhancing regional competitiveness and giving support to business growth. The Council's aspiration for an Eco Enterprise Centre as a focal point for business in the form of an enterprise or incubation hub would increase the offer for start up businesses within the district. Its aim to be an exemplar in sustainable construction and act as flagship building further enhances this offer both in terms of high specification office space and the benefits relating to this in terms of low energy costs. It should further encourage the inward investment of businesses whilst aiding in the creation of higher value jobs.

Summary:

EEDA support Policy ED1 which seeks to diversify and modernise the economy through the growth of existing and new business providing high value employment.

Change to Plan

N/A

Appear at exam?

Not Specified

Soundness Tests

N/A

Core Strategy Submission Document

O - 16214 - 9058 - Policy ED1 - Employment Growth - i

16214 Object

CHAPTER 11 Policy ED1 - Employment Growth

Respondent: C and S Associates [9058]

C and S Associates
Hawkley House
28 Chapel Street
Billericay
CM12 9LU

Agent: Firstplan (Ms K Matthews) [8501]

Firstplan
25 Floral Street
London
WC2E 9DS
020 7031 8210

Full Text: As it is currently drafted, Policy ED1 is unsound because it is not justified. Specifically, the sixth bullet point should be redrafted to include the words "London Southend Airport and its Environs"

This change in wording would acknowledge the relevance of the whole of the defined JAAP area, and will reflect the proposed title of the "London Southend Airport & environs Joint Area Action Plan (JAAP)".

The amended wording will also provide support for the redevelopment of sites, such as the Brickworks site, which is identified within the draft JAAP as an area of change, the redevelopment of which will bring many benefits. The site is previously developed land and currently lies derelict and detracts from the surrounding landscape. Redevelopment will enhance the area and enable the clean up of the site which is likely to incur significant costs.

The amendment to the sixth bullet point to 'London Southend Airport and its Environs' is justified as the growth of both the Airport and its environs are taken into account in the Rochford Employment Land Study and the London Southend Airport & Environs study by Halcrow Group Ltd. (June 2008). Thus this proposed change of wording will make the draft policy sound, whilst enabling the policy to be effective in accordance with paragraphs 4.44 - 4.45 of PPS12.

Summary: As it is currently drafted, Policy ED1 is unsound because it is not justified. Specifically, the sixth bullet point should be redrafted to include the words "London Southend Airport and its Environs"

Change to Plan Amend the sixth bullet point to include the words "London Southend Airport and its Environs".

Appear at exam? Yes **Soundness Tests** i

Core Strategy Submission Document

S - 16689 - 9072 - Policy ED1 - Employment Growth - None

16689 Support

CHAPTER 11 Policy ED1 - Employment Growth

Respondent: Essex County Council (Mr Roy Lewis) [9072] **Agent:** N/A

Essex County Council
ESH - Spatial Planning
Planning and Transport
County Hall
Chelmsford
CM1 4JU
01245-437578

Full Text: ROCHFORD CORE STRATEGY SUBMISSION DOCUMENT, SEPTEMBER 2009
RESPONSE OF ESSEX COUNTY COUNCIL

1. General Comment

Essex County Council welcomes and broadly supports the Core Strategy prepared by Rochford District Council. The Strategy contains policies and proposals that address the spatial characteristics, issues and opportunities facing the District whilst respecting the distinctive qualities of the different settlements and parts of the District.

The County Council fully supports the maintenance of a strong policy approach to protection of the Green Belt and of the quality of environmental assets in the District whilst making adequate housing and employment provision within the District. The Core Strategy presents an approach that emphasises a balance of opportunity through the District and recognition of emerging economic prospects in the District and neighbouring areas. The intended preparation of more detailed Action Area Plans for London Southend Airport and its environs and for each of the three town centres of Rayleigh, Rochford and Hockley will further enhance the approach of the Core Strategy. The emphasis on the three town centres is particularly welcomed as offering a stimulus to improvement in the services and facilities available locally within the District whilst also affording possibilities of increased community focus.

2. Housing Distribution and Locations

The East of England Plan requires Rochford to provide a minimum of 3,790 additional dwellings between 2006 and 2021. In addition, provision for a further 1,000 dwellings should be made between 2021 and 2025 to ensure delivery of housing for at least 15 years from adoption of the Core Strategy (expected in 2010). Of this total requirement the District Council has identified a capacity of 2,000 dwellings through a Strategic Housing Land Availability Assessment. This means that the Core Strategy has to identify locations for about 1,750 dwellings to be delivered before 2021 and a further 1,000 dwellings between 2021 and 2025.

Policy H1 (The efficient use of land for housing) is supported. However, prioritisation of the reuse of previously developed land within settlements for additional housing is unlikely to provide a sufficient source of provision due to the generally residential nature of existing settlements in the district and the absence of potentially large sites of previously developed land. The assessment of potential for additional housing provision within settlements already includes the proposed re-allocation to substantially residential use of 4 existing employment areas.

Within Policy H2 (Extensions to residential envelopes and phasing) and Policy H3 (Extension to residential envelopes post-2021) the District Council has adopted a balanced approach to the distribution of additional housing locations, which is based on identification of tiers of settlements defined by reference to their accessibility to jobs, services and facilities (some of which lie outside the District) and the need to protect the valued environments within the District. This approach is generally supported, although implementation and delivery of individual schemes should give further thought to securing sustainable functional relationships between proposed development locations and availability of jobs, services and facilities.

The proposed scale and phasing of development at each of the identified locations in Policy H2 and Policy H3 should be capable of being supported by County Council service groups, provided that adequate and timely funding is available. The County Council would wish to work with the District Council to ensure that future infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

3. Economic Development

The approach to Employment Growth (Policy ED1) is supported. Given the economic structure of Rochford District the support to be given to protection and enhancement of the role of small and medium sized businesses; enhancement of the District's commercial centres; and development of a skills training academy is particularly welcome. These measures will assist in building on the existing economic resource of the District.

Proposals for the comprehensive development of London Southend Airport and its environs (Policy ED2) are supported.

16689 Support

CHAPTER 11 Policy ED1 - Employment Growth

The further elaboration of proposals through an Area Action Plan will provide a firm foundation to realise the economic regeneration and growth opportunities presented by effective use of the Airport. The recognition of the potential environmental impact of the Airport and the commitment to work to mitigate any adverse impacts on the environment and local amenities is fully supported.

The location of the proposed Eco-Enterprise Centre to the North of London Southend Airport (Policy ED4) is supported. Creation of the Centre would assist reduction of the rate of business start-up failure in the district. Further the proposed location for the Centre would afford a clear offer to businesses within an area of varied business activity.

The continued protection and enhancement of existing employment land (Policy ED3) is supported, as is the identification of 4 existing employment sites for appropriate alternative, substantially residential, uses. Each of the 4 sites affords particular issues and opportunities whereby their redevelopment for other uses and relocation of existing occupiers would confer advantage for the immediately neighbouring areas and for the District as a whole.

4. Town Centres

The town centres of Rayleigh, Rochford and Hockley, and future plans for them, are closely linked to the economic development of the District but also present the opportunity to offer greater community focus within the District. The varied approach being taken to each of these town centres is supported (Policy RTC4, RTC5 and RTC6), notably the recognition of the role and purpose of the town centres beyond retail uses.

The contribution that the County Library service could make to plans for the town centres should not be overlooked. The 5 libraries in the District are substantial footfall draws in their localities and act as a 'community anchor store'. This has knock-on effects in encouraging use of neighbouring retail and service facilities. Further the Library service is currently looking at co-location opportunities for other services within the libraries which would enable them to act as a community focus.

5. Transport

The transport aspects of the Core Strategy are well balanced in identifying potential measures that would meet the needs of existing residents and businesses in the District as well as needs arising from future development. The approach reflects and makes good reference to the transportation aspirations of the County Council. The policy emphasis on close working between the District Council and the County Council to advance the transport aspirations is welcomed and fully supported.

In relation to parking standards (Policy T8 and Paragraph 10.30) the review undertaken by Essex County Council in conjunction with the Essex Planning Officers Association has now been completed. Revised parking standards have been agreed and signed off as County Supplementary Guidance, in accordance with PPS12, and is being applied by the County Council as Local Highways Authority.

6. Coastal Protection Belt

Policy ENV2 (Coastal Protection Belt) is not supported because in its current form it is not a suitable or effective replacement policy for Policy CC1 of the Replacement Structure Plan. Structure Plan Policy CC1 (The Undeveloped Coast - Coastal Protection Belt) currently remains a 'saved' policy of the Essex and Southend-on-Sea Replacement Structure Plan, April 2001 (following a direction of the Secretary of State, dated 27th September 2007, under paragraph 1(3) of Schedule 8 to the Planning and Compulsory Purchase Act 2004). The existing Policy CC1 reads, 'Within the Coastal Protection Belt defined in adopted local plans there shall be the most stringent restrictions on development within the rural and undeveloped coastline situated outside existing built-up areas, and any development which is exceptionally permitted within this Belt shall not adversely affect the open and rural character, historic features or wildlife.'

Core Strategy Policy ENV2 should be revised to include specific reference to,

- * Definition of the boundary of the Coastal Protection Belt in another Development Plan Document;
- * the application of the most stringent restrictions on development within the rural and undeveloped coastline;
- * any development exceptionally permitted not adversely affecting the open and rural character, historic features or wildlife.

7. Historic Environment

The importance of the historic environment in Rochford District is clearly identified within the Core Strategy document. Nevertheless, the policy guidance could be usefully enhanced to promote consideration and enhancement of the historic environment and use of the historic environment to shape place. This would be achieved by the following amendments to the Core Strategy,

- * Policy ENV1 (Protection and Enhancement of the Natural Landscape and Habitats and the Protection of Historical and Archaeological Sites) should be amended by deletion of the final sentence and its replacement with, 'The Council is committed to the protection, promotion and enhancement of the diverse historic landscape and extensive surviving archaeological deposits of the District.'

16689 Support

CHAPTER 11 Policy ED1 - Employment Growth

* Paragraph 8.15 of the supporting text should be amended to better support the suggested amendment to Policy ENV1. The existing text of Paragraph 8.15 should be deleted in its entirety and replaced by,
The historic environment of Rochford District has developed through a history of human activity that spans over 450,000 years. Much of the resource lies hidden beneath the ground in the form of archaeological deposits. Other elements such as the historic landscape, the pattern of field, farms, woods and grazing marsh which characterise the District, are a highly visible record of millennia of agriculture, industry and commerce. Of particular significance are the coastal, island and estuarine areas where multi-period landscapes reflecting the exploitation of coastal and marshland resource survive. The District also includes the important historic medieval market towns of Rochford and Rayleigh.

* Page 16 (Sustainable Community Strategy Priority: Promoting a Greener District) should be amended to further support the approach to the Historic Environment. The fourth bullet of the Key Section/Policies of the Core Strategy should be amended to include the word 'historic', so that the first sentence of the bullet would read,
The Environment chapter seeks to protect and enhance the biodiversity, historic and natural environment of the District by protecting sites of local, national and international importance.

8. Community Infrastructure

The approach to Community Infrastructure is supported. The County Council would wish to work with the District Council to ensure that future community infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

In addition, it should be noted that,

* Some County Council services are not highly visible despite being regarded as highly desirable community services by local residents. The need to ensure adequate funding and contributions to enable these services to meet community expectations should be recognised and acknowledged in consideration of planning obligations and standard charges.

* The Adult Community Learning Centre at Rocheway, Rochford could be better located with regard to the wider Rochford/Castle Point area of service. Relocation of the Centre could provide opportunities both at the new location and for the current site.

* The Core Strategy should make specific reference to,

o Appendix H1, Location at South Canewdon: new Early Years and Childcare facilities;

o Policy CLT2, final sentence: insert after the words 'primary schools' the words 'and Early Years and Childcare facilities';

o Appendix CLT1, Other issues/comment: for Early years and childcare facilities add 'Land to be allocated within new residential areas, as appropriate'.

9. Implementation, Delivery and Monitoring

The inclusion in the Core Strategy of a section considering Implementation, Delivery and Monitoring is welcomed and supported. Nevertheless, the District Council, in moving towards implementation and delivery of the individual elements of the Core Strategy, should highlight those schemes and projects that are critical to achievement of other aspects of the Strategy.

Further, the monitoring proposal for Policy H6 (Lifetime Homes) and for Policy CP1 (Design) should be amended,

* Policy H6 (Lifetime Homes) - the identified monitoring tool is Core Indicator H6 Housing Quality Building for Life Assessments. The Building for Life Assessment methodology was devised to measure the overall design/layout quality of housing developments. It was not devised to measure compliance with Lifetime Homes, which is largely, but not exclusively, concerned with internal space standards and the provision of internal arrangements within dwellings to meet needs of all residents.

* Policy CP1 (Design) - the monitoring indicator proposed by the Core Strategy is not supported because it is unclear what the indicator would actually be measuring. The proposed indicator should be replaced by the Core Indicator, Housing Quality - Building for Life Assessments, as suggested by the County Council in its response to the Core Strategy Preferred Options, October 2008. A better approach would be to base evaluation and monitoring of Policy CP1 on the Commission for Architecture and the Built Environment's (CABE) 20 Building for Life principles, particularly as Government has endorsed these principles and is urging local authorities to use them to assess design quality. It is suggested that the monitoring arrangements for Preferred Option CP1 be deleted and replaced by the following text, 'The success of the implementation of this policy will be monitored by assessing schemes, or an appropriate sample of schemes, against the Commission for Architecture and the Built Environment's (CABE) Building for Life principles.'

10. Access to Housing

The Core Strategy notes the higher prevalence of older people in Rochford District and the need to support them. However, a more broadly based approach to access to housing should be adopted by Policies H4, H5 and H6. It should recognise the presence of other vulnerable adults in the community, for example, those with learning or mental health disability, and the range of possible forms of accommodation, including supported, sheltered and extra care accommodation. The high level of owner occupation in the District further emphasises the need for a broader approach. The emphasis on Lifetime Homes would not address the variety of future needs, whilst the potential exemptions to the

Core Strategy Submission Document

S - 16689 - 9072 - Policy ED1 - Employment Growth - None

16689 Support

CHAPTER 11 Policy ED1 - Employment Growth

Summary: Lifetime Homes policy standard in Policy H6 are likely to act against demographic trends. The approach to Employment Growth (Policy ED1) is supported. Given the economic structure of Rochford District the support to be given to protection and enhancement of the role of small and medium sized businesses; enhancement of the District's commercial centres; and development of a skills training academy is particularly welcome. These measures will assist in building on the existing economic resource of the District.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 15999 - 13441 - London Southend Airport and Environs, 11.20 - None

15999 Support

CHAPTER 11 London Southend Airport and Environs, 11.20

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: Are you certain that Southend Airport's relative importance to the region is the reason for preparing a Joint Area Action Plan?

Summary: Are you certain that Southend Airport's relative importance to the region is the reason for preparing a Joint Area Action Plan?

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 15927 - 14128 - London Southend Airport and Environs, 11.24 - i, iii

15927 Object

CHAPTER 11 London Southend Airport and Environs, 11.24

Respondent: mr Julian Nichols [14128]

Agent: N/A

5 Buxton Close
Leigh-on-Sea
Essex
SS93UF
UK
01702558543

Full Text: The policy is unsound because there is scant consideration for the environmental impact on the area and residents. At a time where the UK is already struggling to reduce carbon emissions to promised levels, and where noise pollution is seen as an increasing health problem, our Councils wish to buck the trend. I have received no direct correspondence from either Council.
The Councils have deliberately made it difficult for the ordinary man in the street and the elderly to comment on this development.
Think about quality of life.

Summary: The policy is unsound because there is scant consideration for the environmental impact on the area and residents. At a time where the UK is already struggling to reduce carbon emissions to promised levels, and where noise pollution is seen as an increasing health problem, our Councils wish to buck the trend. I have received no direct correspondence from either Council.
The Councils have deliberately made it difficult for the ordinary man in the street and the elderly to comment on this development.
Think about quality of life.

Change to Plan Our Councils should look to reduce, not increase, air and noise pollution and air transport.
Why not write to everyone affected and give them a reply envelope? This is the way to ascertain the true feelings of those affected.
The language used e.g. "....the DPD is legally compliant" is confusing - I am not a lawyer, so how can I comment on this?

Appear at exam? No

Soundness Tests i, iii

Core Strategy Submission Document

S - 16000 - 13441 - London Southend Airport and Environs, 11.25 - None

16000 Support

CHAPTER 11 London Southend Airport and Environs, 11.25

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: Welcome recognition that over-reliance on one employment sector is undesirable.

Summary: Welcome recognition that over-reliance on one employment sector is undesirable.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 15744 - 14024 - Policy ED2 - London Southend Airport - i, ii, iii

15744 Object

CHAPTER 11 Policy ED2 - London Southend Airport

Respondent: Miss Katrina Sullivan [14024]

126 Marine Parade
Leigh on Sea
Essex
ss9 2rf
UK
07533 946986

Agent: N/A

Full Text: Just wanted to say this is really not user friendly (average person) is not capable of reading through all this rubbish before making a comment, why do you make it so hard to voice your views, or is that the intention, I am totally against the expansion of the runway- reasons - congestion A13/A127 - (at Tax payer's expense). quality of life, people on flight path, noise, night flights, environmental issues, schools underneath flight path, Gatwick/Stanstead Airports on our doorstep losing money lack of demand. St.Lawrence Church ? Stobart Group will gain financially at local people's expense.

Summary: Just wanted to say this is really not user friendly (average person) is not capable of reading through all this rubbish before making a comment, why do you make it so hard to voice your views, or is that the intention, I am totally against the expansion of the runway- reasons - congestion A13/A127 - (at Tax payer's expense). quality of life, people on flight path, noise, night flights, environmental issues, schools underneath flight path, Gatwick/Stanstead Airports on our doorstep losing money lack of demand. St.Lawrence Church ? Stobart Group will gain financially at local people's expense.

Change to Plan Listen to the people. Read the letter's that have been sent to the local MP's, refer to 21 May 2009: Column 1681 from David Amess (Southend, West) he wrote in all my time here, I have never had as many individual, handwritten letters from constituents as I have on the issue of the expansion to London Southend Airport, objecting.

Make it easier for people to give their views - this is too difficult.

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 15915 - 4951 - Policy ED2 - London Southend Airport - i, ii, iii

15915 Object

CHAPTER 11 Policy ED2 - London Southend Airport

Respondent: Hockley Residents Association (Mr B Guyett) [4951] **Agent:** N/A

Hockley Residents Association
2 Tonbridge Road
Hockley
Essex
SS5 5HL

Full Text: Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
i. (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.
i. EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary: Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 and RDC policy T1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

Bus services are poor with just 3* an hour.

The site selected for the new industrial estate also contravenes PPS4.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development."

Change to Plan Review policy

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 15917 - 11793 - Policy ED2 - London Southend Airport - i, ii, iii

15917 Object

CHAPTER 11 Policy ED2 - London Southend Airport

Respondent: Mr Brian Guyett [11793]

2 Tonbridge Road,
Hockley
SS55HL
United Kingdom
07736211248

Agent: N/A

Full Text:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;

i. (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

i. EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 and RDC policy T1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths". Bus services are poor with just 3* an hour. The site selected for the new industrial estate also contravenes PPS4. It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development."

Change to Plan revise policy

Appear at exam? No

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 15928 - 14128 - Policy ED2 - London Southend Airport - iii

15928 Object

CHAPTER 11 Policy ED2 - London Southend Airport

Respondent: mr Julian Nichols [14128]

Agent: N/A

5 Buxton Close
Leigh-on-Sea
Essex
SS93UF
UK
01702558543

Full Text: The development of Southend Airport is unsound on environmental grounds. Our Councils should be looking to reduce air and noise pollution, not increasing it.
The Councils have made responding to this very difficult, including the terminology use "Legally compliant or sound" - what do such terms mean to the man in the street? The paper documents are not available in Leigh locations, which will be heavily effected by the increased flights.
The Councils have not adequately consulted with the community affected by the proposal.
What the Stobbarads gain from this, the community will pay the price for.

Summary: The development of Southend Airport is unsound on environmental grounds. Our Councils should be looking to reduce air and noise pollution, not increasing it.
The Councils have made responding to this very difficult, including the terminology use "Legally compliant or sound" - what do such terms mean to the man in the street? The paper documents are not available in Leigh locations, which will be heavily effected by the increased flights.
The Councils have not adequately consulted with the community affected by the proposal.
What the Stobbarads gain from this, the community will pay the price for.

Change to Plan Further consideration of reducing air and noise pollution. Evaluating how the proposed expansion fits into the national tagets for carbon emmission reduction.
Expand the availability of paper documents to all areas affected and simplify the language and methods to comment.

Appear at exam? No **Soundness Tests** iii

Core Strategy Submission Document

S - 15947 - 9032 - Policy ED2 - London Southend Airport - None

15947 Support

CHAPTER 11 Policy ED2 - London Southend Airport

Respondent: Essex Chambers of Commerce (Mr John Dallaway) **Agent:** N/A
[9032]

Essex Chambers of Commerce
2nd Floor,
Viscount House,
London Southend Airport, Southend-on-Sea.
Essex.
SS2 6YF
01702-560100

Full Text: Essex Chambers of Commerce strongly supports the development of London Southend Airport as a catalyst for economic growth and employment generation in the sub-region.

Summary: Essex Chambers of Commerce strongly supports the development of London Southend Airport as a catalyst for economic growth and employment generation in the sub-region.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16030 - 10324 - Policy ED2 - London Southend Airport - i, ii, iii

16030 Object

CHAPTER 11 Policy ED2 - London Southend Airport

Respondent: Mrs Jennifer Abbey [10324]

3 Claybrick Avenue
Hockley
Essex
SS5 4PS
UK
07768 542634

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;

â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 and PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

Change to Plan Revise policy.

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

S - 16064 - 14107 - Policy ED2 - London Southend Airport - None

16064 Support

CHAPTER 11 Policy ED2 - London Southend Airport

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: We support this policy

Summary: We support this policy

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16135 - 14168 - Policy ED2 - London Southend Airport - ii

16135 Object

CHAPTER 11 Policy ED2 - London Southend Airport

Respondent: Mr Ian Nicholls [14168]

48 York Road
Rayleigh
SS6 8SB
UK
01702520228

Agent: N/A

Full Text: This is too difficult a process for many people.
Evaluating how the proposed expansion fits into the national targets for carbon emission reduction.
Please give the people of this area further help to reduce air and noise pollution.

Summary: This is too difficult a process for many people.
Evaluating how the proposed expansion fits into the national targets for carbon emission reduction.
Please give the people of this area further help to reduce air and noise pollution.

Change to Plan In my view the development of Southend Airport will adversely impact on the quality of life and general health for a large number of residents in the Rochford and Southend area. The Councils should be trying to reduce air and noise pollution, not increase it. My main objection is that if air traffic is allowed to increase from current levels then an increased amount to current levels of "spent" aviation fuel will be breathed in by the general population. It is my opinion that our general health will suffer. I think that any required increase in air traffic must be from a lowly populated site, not a densely populated area such as Southend and Rochford. I oppose the plan.

Appear at exam? No

Soundness Tests ii

Core Strategy Submission Document

O - 16140 - 13096 - Policy ED2 - London Southend Airport - i, ii

16140 Object

CHAPTER 11 Policy ED2 - London Southend Airport

Respondent: Mr Alan West [13096]

37 Woodlands Road
Hockley
Essex
SS5 4PL
United Kingdom

Agent: N/A

Full Text: There is a high level of public opposition to airport expansion, so it might not go ahead. It is surely unsound therefore for the council to assume that it will?

Summary: There is a high level of public opposition to airport expansion, so it might not go ahead. It is surely unsound therefore for the council to assume that it will?

Change to Plan Do not assume that airport expansion is a done deal.

Appear at exam? No

Soundness Tests i, ii

Core Strategy Submission Document

S - 16186 - 12008 - Policy ED2 - London Southend Airport - None

16186 Support

CHAPTER 11 Policy ED2 - London Southend Airport

Respondent: EEDA (Mrs Juliet Richardson) [12008]

Agent: N/A

EEDA
The Business Centre
Station Road
Histon
Cambridge
CB4 9LQ
UK
01223 484632

Full Text: The Regional Economic Strategy clearly identifies the potential of the airport as a key transport gateway for the Thames Gateway, as previously identified in representation for Policy ED1. EEDA welcomes policy ED2 for London Southend Airport and the Councils joint approach with Southend Borough Council to develop and Area Action Plan. This approach should ensure that the role of the airport and its potential as a focus and catalyst for economic growth can be fully harnessed.

Summary: The Regional Economic Strategy clearly identifies the potential of the airport as a key transport gateway for the Thames Gateway, as previously identified in representation for Policy ED1. EEDA welcomes policy ED2 for London Southend Airport and the Councils joint approach with Southend Borough Council to develop and Area Action Plan. This approach should ensure that the role of the airport and its potential as a focus and catalyst for economic growth can be fully harnessed.

Change to Plan N/A

Appear at exam? Not Specified

Soundness Tests N/A

Core Strategy Submission Document

O - 16215 - 9058 - Policy ED2 - London Southend Airport - i

16215 Object

CHAPTER 11 Policy ED2 - London Southend Airport

Respondent: C and S Associates [9058]

C and S Associates
Hawkley House
28 Chapel Street
Billericay
CM12 9LU

Agent: Firstplan (Ms K Matthews) [8501]

Firstplan
25 Floral Street
London
WC2E 9DS
020 7031 8210

Full Text: Draft Policy ED2 is currently unsound as it is not justified. Specifically, the title of the policy should be amended to read "London Southend Airport and its Environs"

This change in wording acknowledges the whole of the defined JAAP area is relevant, and reflects the proposed title of the "London Southend Airport & environs Joint Area Action Plan (JAAP)".

The amendment to the title to 'London Southend Airport and its Environs' is justified as the growth of both the Airport and its environs are taken into account in the Rochford Employment Land Study and the London Southend Airport & Environs study by Halcrow Group Ltd. (June 2008). Thus this proposed change of wording is sound, whilst enabling the policy to be effective in accordance with paragraphs 4.44 - 4.45 of PPS12

Overall, the draft policy will provide for the emerging Southend Airport Joint Area Action Plan (JAAP), and will enable the area surrounding London Southend Airport to be appropriately developed, including our clients site.

Summary: Draft Policy ED2 is currently unsound as it is not justified. Specifically, the title of the policy should be amended to read "London Southend Airport and its Environs"

Change to Plan The title of the policy should be amended to read "London Southend Airport and its Environs"

Appear at exam? Yes **Soundness Tests** i

Core Strategy Submission Document

O - 16226 - 9935 - Policy ED2 - London Southend Airport - i, iii

16226 Object

CHAPTER 11 Policy ED2 - London Southend Airport

Respondent: CPREssex (Mrs Valerie Stanton) [9935]

Agent: N/A

CPREssex
Hillcrest Farm
Lark Hil Road
Canewdon
SS4 3RZ
Essex

Full Text: CPREssex have already responded in detail to plans for the expansion of the airport. We are concerned that the creation of so many jobs is dependent on expansion of the airport and also at the concentration of employment uses in this area. The proposed employment site to the north of Aviation Way creates a very large area of employment uses concentrated in one area. This could lead to traffic problems both locally and over a wider area.

Summary: CPREssex have already responded in detail to plans for the expansion of the airport. We are concerned that the creation of so many jobs is dependent on expansion of the airport and also at the concentration of employment uses in this area. The proposed employment site to the north of Aviation Way creates a very large area of employment uses concentrated in one area. This could lead to traffic problems both locally and over a wider area.

Change to Plan It is unsound to expect a large number of jobs to be created by possible airport expansion and also to concentrate such a large number of jobs in one place.

Other smaller sites should be found for employment use throughout the District. eg. at Stambridge Mill.

Appear at exam? No

Soundness Tests i, iii

Core Strategy Submission Document

S - 16690 - 9072 - Policy ED2 - London Southend Airport - None

16690 Support

CHAPTER 11 Policy ED2 - London Southend Airport

Respondent: Essex County Council (Mr Roy Lewis) [9072] **Agent:** N/A

Essex County Council
ESH - Spatial Planning
Planning and Transport
County Hall
Chelmsford
CM1 4JU
01245-437578

Full Text: ROCHFORD CORE STRATEGY SUBMISSION DOCUMENT, SEPTEMBER 2009
RESPONSE OF ESSEX COUNTY COUNCIL

1. General Comment

Essex County Council welcomes and broadly supports the Core Strategy prepared by Rochford District Council. The Strategy contains policies and proposals that address the spatial characteristics, issues and opportunities facing the District whilst respecting the distinctive qualities of the different settlements and parts of the District.

The County Council fully supports the maintenance of a strong policy approach to protection of the Green Belt and of the quality of environmental assets in the District whilst making adequate housing and employment provision within the District. The Core Strategy presents an approach that emphasises a balance of opportunity through the District and recognition of emerging economic prospects in the District and neighbouring areas. The intended preparation of more detailed Action Area Plans for London Southend Airport and its environs and for each of the three town centres of Rayleigh, Rochford and Hockley will further enhance the approach of the Core Strategy. The emphasis on the three town centres is particularly welcomed as offering a stimulus to improvement in the services and facilities available locally within the District whilst also affording possibilities of increased community focus.

2. Housing Distribution and Locations

The East of England Plan requires Rochford to provide a minimum of 3,790 additional dwellings between 2006 and 2021. In addition, provision for a further 1,000 dwellings should be made between 2021 and 2025 to ensure delivery of housing for at least 15 years from adoption of the Core Strategy (expected in 2010). Of this total requirement the District Council has identified a capacity of 2,000 dwellings through a Strategic Housing Land Availability Assessment. This means that the Core Strategy has to identify locations for about 1,750 dwellings to be delivered before 2021 and a further 1,000 dwellings between 2021 and 2025.

Policy H1 (The efficient use of land for housing) is supported. However, prioritisation of the reuse of previously developed land within settlements for additional housing is unlikely to provide a sufficient source of provision due to the generally residential nature of existing settlements in the district and the absence of potentially large sites of previously developed land. The assessment of potential for additional housing provision within settlements already includes the proposed re-allocation to substantially residential use of 4 existing employment areas.

Within Policy H2 (Extensions to residential envelopes and phasing) and Policy H3 (Extension to residential envelopes post-2021) the District Council has adopted a balanced approach to the distribution of additional housing locations, which is based on identification of tiers of settlements defined by reference to their accessibility to jobs, services and facilities (some of which lie outside the District) and the need to protect the valued environments within the District. This approach is generally supported, although implementation and delivery of individual schemes should give further thought to securing sustainable functional relationships between proposed development locations and availability of jobs, services and facilities.

The proposed scale and phasing of development at each of the identified locations in Policy H2 and Policy H3 should be capable of being supported by County Council service groups, provided that adequate and timely funding is available. The County Council would wish to work with the District Council to ensure that future infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

3. Economic Development

The approach to Employment Growth (Policy ED1) is supported. Given the economic structure of Rochford District the support to be given to protection and enhancement of the role of small and medium sized businesses; enhancement of the District's commercial centres; and development of a skills training academy is particularly welcome. These measures will assist in building on the existing economic resource of the District.

Proposals for the comprehensive development of London Southend Airport and its environs (Policy ED2) are supported.

Core Strategy Submission Document

S - 16690 - 9072 - Policy ED2 - London Southend Airport - None

16690 Support

CHAPTER 11 Policy ED2 - London Southend Airport

The further elaboration of proposals through an Area Action Plan will provide a firm foundation to realise the economic regeneration and growth opportunities presented by effective use of the Airport. The recognition of the potential environmental impact of the Airport and the commitment to work to mitigate any adverse impacts on the environment and local amenities is fully supported.

The location of the proposed Eco-Enterprise Centre to the North of London Southend Airport (Policy ED4) is supported. Creation of the Centre would assist reduction of the rate of business start-up failure in the district. Further the proposed location for the Centre would afford a clear offer to businesses within an area of varied business activity.

The continued protection and enhancement of existing employment land (Policy ED3) is supported, as is the identification of 4 existing employment sites for appropriate alternative, substantially residential, uses. Each of the 4 sites affords particular issues and opportunities whereby their redevelopment for other uses and relocation of existing occupiers would confer advantage for the immediately neighbouring areas and for the District as a whole.

4. Town Centres

The town centres of Rayleigh, Rochford and Hockley, and future plans for them, are closely linked to the economic development of the District but also present the opportunity to offer greater community focus within the District. The varied approach being taken to each of these town centres is supported (Policy RTC4, RTC5 and RTC6), notably the recognition of the role and purpose of the town centres beyond retail uses.

The contribution that the County Library service could make to plans for the town centres should not be overlooked. The 5 libraries in the District are substantial footfall draws in their localities and act as a 'community anchor store'. This has knock-on effects in encouraging use of neighbouring retail and service facilities. Further the Library service is currently looking at co-location opportunities for other services within the libraries which would enable them to act as a community focus.

5. Transport

The transport aspects of the Core Strategy are well balanced in identifying potential measures that would meet the needs of existing residents and businesses in the District as well as needs arising from future development. The approach reflects and makes good reference to the transportation aspirations of the County Council. The policy emphasis on close working between the District Council and the County Council to advance the transport aspirations is welcomed and fully supported.

In relation to parking standards (Policy T8 and Paragraph 10.30) the review undertaken by Essex County Council in conjunction with the Essex Planning Officers Association has now been completed. Revised parking standards have been agreed and signed off as County Supplementary Guidance, in accordance with PPS12, and is being applied by the County Council as Local Highways Authority.

6. Coastal Protection Belt

Policy ENV2 (Coastal Protection Belt) is not supported because in its current form it is not a suitable or effective replacement policy for Policy CC1 of the Replacement Structure Plan. Structure Plan Policy CC1 (The Undeveloped Coast - Coastal Protection Belt) currently remains a 'saved' policy of the Essex and Southend-on-Sea Replacement Structure Plan, April 2001 (following a direction of the Secretary of State, dated 27th September 2007, under paragraph 1(3) of Schedule 8 to the Planning and Compulsory Purchase Act 2004). The existing Policy CC1 reads, 'Within the Coastal Protection Belt defined in adopted local plans there shall be the most stringent restrictions on development within the rural and undeveloped coastline situated outside existing built-up areas, and any development which is exceptionally permitted within this Belt shall not adversely affect the open and rural character, historic features or wildlife.'

Core Strategy Policy ENV2 should be revised to include specific reference to,

- * Definition of the boundary of the Coastal Protection Belt in another Development Plan Document;
- * the application of the most stringent restrictions on development within the rural and undeveloped coastline;
- * any development exceptionally permitted not adversely affecting the open and rural character, historic features or wildlife.

7. Historic Environment

The importance of the historic environment in Rochford District is clearly identified within the Core Strategy document. Nevertheless, the policy guidance could be usefully enhanced to promote consideration and enhancement of the historic environment and use of the historic environment to shape place. This would be achieved by the following amendments to the Core Strategy,

- * Policy ENV1 (Protection and Enhancement of the Natural Landscape and Habitats and the Protection of Historical and Archaeological Sites) should be amended by deletion of the final sentence and its replacement with, The Council is committed to the protection, promotion and enhancement of the diverse historic landscape and extensive surviving archaeological deposits of the District.

Core Strategy Submission Document

S - 16690 - 9072 - Policy ED2 - London Southend Airport - None

16690 Support

CHAPTER 11 Policy ED2 - London Southend Airport

* Paragraph 8.15 of the supporting text should be amended to better support the suggested amendment to Policy ENV1. The existing text of Paragraph 8.15 should be deleted in its entirety and replaced by,
The historic environment of Rochford District has developed through a history of human activity that spans over 450,000 years. Much of the resource lies hidden beneath the ground in the form of archaeological deposits. Other elements such as the historic landscape, the pattern of field, farms, woods and grazing marsh which characterise the District, are a highly visible record of millennia of agriculture, industry and commerce. Of particular significance are the coastal, island and estuarine areas where multi-period landscapes reflecting the exploitation of coastal and marshland resource survive. The District also includes the important historic medieval market towns of Rochford and Rayleigh.

* Page 16 (Sustainable Community Strategy Priority: Promoting a Greener District) should be amended to further support the approach to the Historic Environment. The fourth bullet of the Key Section/Policies of the Core Strategy should be amended to include the word 'historic', so that the first sentence of the bullet would read,
The Environment chapter seeks to protect and enhance the biodiversity, historic and natural environment of the District by protecting sites of local, national and international importance.

8. Community Infrastructure

The approach to Community Infrastructure is supported. The County Council would wish to work with the District Council to ensure that future community infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

In addition, it should be noted that,

* Some County Council services are not highly visible despite being regarded as highly desirable community services by local residents. The need to ensure adequate funding and contributions to enable these services to meet community expectations should be recognised and acknowledged in consideration of planning obligations and standard charges.

* The Adult Community Learning Centre at Rocheway, Rochford could be better located with regard to the wider Rochford/Castle Point area of service. Relocation of the Centre could provide opportunities both at the new location and for the current site.

* The Core Strategy should make specific reference to,

o Appendix H1, Location at South Canewdon: new Early Years and Childcare facilities;

o Policy CLT2, final sentence: insert after the words 'primary schools' the words 'and Early Years and Childcare facilities';

o Appendix CLT1, Other issues/comment: for Early years and childcare facilities add 'Land to be allocated within new residential areas, as appropriate'.

9. Implementation, Delivery and Monitoring

The inclusion in the Core Strategy of a section considering Implementation, Delivery and Monitoring is welcomed and supported. Nevertheless, the District Council, in moving towards implementation and delivery of the individual elements of the Core Strategy, should highlight those schemes and projects that are critical to achievement of other aspects of the Strategy.

Further, the monitoring proposal for Policy H6 (Lifetime Homes) and for Policy CP1 (Design) should be amended,

* Policy H6 (Lifetime Homes) - the identified monitoring tool is Core Indicator H6 Housing Quality Building for Life Assessments. The Building for Life Assessment methodology was devised to measure the overall design/layout quality of housing developments. It was not devised to measure compliance with Lifetime Homes, which is largely, but not exclusively, concerned with internal space standards and the provision of internal arrangements within dwellings to meet needs of all residents.

* Policy CP1 (Design) - the monitoring indicator proposed by the Core Strategy is not supported because it is unclear what the indicator would actually be measuring. The proposed indicator should be replaced by the Core Indicator, Housing Quality - Building for Life Assessments, as suggested by the County Council in its response to the Core Strategy Preferred Options, October 2008. A better approach would be to base evaluation and monitoring of Policy CP1 on the Commission for Architecture and the Built Environment's (CABE) 20 Building for Life principles, particularly as Government has endorsed these principles and is urging local authorities to use them to assess design quality. It is suggested that the monitoring arrangements for Preferred Option CP1 be deleted and replaced by the following text, 'The success of the implementation of this policy will be monitored by assessing schemes, or an appropriate sample of schemes, against the Commission for Architecture and the Built Environment's (CABE) Building for Life principles.'

10. Access to Housing

The Core Strategy notes the higher prevalence of older people in Rochford District and the need to support them. However, a more broadly based approach to access to housing should be adopted by Policies H4, H5 and H6. It should recognise the presence of other vulnerable adults in the community, for example, those with learning or mental health disability, and the range of possible forms of accommodation, including supported, sheltered and extra care accommodation. The high level of owner occupation in the District further emphasises the need for a broader approach. The emphasis on Lifetime Homes would not address the variety of future needs, whilst the potential exemptions to the

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S - 16690 - 9072 - Policy ED2 - London Southend Airport - None

16690 Support

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Summary: Lifetime Homes policy standard in Policy H6 are likely to act against demographic trends. Proposals for the comprehensive development of London Southend Airport and its environs (Policy ED2) are supported. The further elaboration of proposals through an Area Action Plan will provide a firm foundation to realise the economic regeneration and growth opportunities presented by effective use of the Airport. The recognition of the potential environmental impact of the Airport and the commitment to work to mitigate any adverse impacts on the environment and local amenities is fully supported.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

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Respondent: Barratt Eastern Counties [10009]

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Full Text: Local Development Framework

Representations on the Core Strategy
Submission Document, November 2009
On behalf of Barratts Eastern Counties

Introduction

The requirements of Core Strategies are enshrined in the 2004 Planning and Compensation Act, the Town & Country Planning (Local Development) England (Regulations) 2004 and the 2008 policy guidance in PPS12. The requirements of Coe Strategies are clear. And they are legal requirements. The Core Strategy must comply with the Local Development Scheme, Statement of Community Involvement and the Regulations. The Core Strategy must be subject to a sustainability appraisal, have regard to national guidance, conform generally with the Regional Spatial Strategy and have regard to any Sustainable Community Strategy. A Core strategy must be sound - justified, effective and consistent with national policy. The following representations therefore focus on these legal requirements.

HOUSING

Paragraph 4.6 - Evidence Base

To meet the soundness test Submission Core Strategies (SCS) must be justified, that is to say it must be founded on robust and credible evidence base and comprise the most appropriate strategy when considered against reasonable alternatives. The housing strategy in as far as it identifies a need for Green belt sites is sound, however, there are other elements which are unsound.

Paragraph 4.6 notes that the Strategic Housing Land Availability Assessment (SHLAA) has examined the supply of housing. It is presumed that the Table at paragraph 4.6 is the outcome of this examination. Whilst the SHLAA has some legitimacy in that it identifies various sites that are apparently available, we are concerned that because the SHLAA was only published in November 2009 it post dates the SCS. This implies that the SCS is driving the SHLAA exercise rather than the other way round. Whilst this may have no real practical effect on the outcome of the SCS and the identified need for Green Belt sites, the Inspector will be mindful of the advice in paragraphs 33 and 54 of PPS3 that SCS draw on the evidence in SHLAA. It may be that the SCS should explain how the evidence base has been used to justify the strategy.

PPS12 explains at paragraph 4.37 that Core Strategies are based on thorough evidence. Since the SHLAA has only recently been published it is considered that the SCS is unsound as it is not justifiable. This, together with other comments on the SCS, indicates that the process should be delayed to ensure that a more robust document is placed in front of the EiP Inspector.

Table at Paragraph 4.6 - Evidence base

From our review of the available evidence it would appear that the housing land supply is insufficient and that Green Belt release are required. From the wider strategy being promoted we note that some of the sites that the District Council consider to be 'appropriate' are likely to relate to existing employment areas. As set out elsewhere in our representations, we maintain severe reservations that the redevelopment of existing employment sites for alternative uses and particularly the Eldon Way Industrial Estate is unsustainable. We will make reference to the effectiveness of this strategy in relation to sustainability, whether it is justified in the context of National Policy and the deliverability of such a strategy elsewhere.

In particular, paragraph 11.32 of the SCS refers to existing employment land and sites within the UCS. It does not refer the SHLAA and as such it appears that an evidence base to support the re-use of employment land for residential is not reported in the SCS.

Having reviewed the 2008 Annual Monitoring Report, as we did when commenting on the 2008 Preferred Options Core Strategy, we maintain severe doubts as to the appropriateness of some of the previously developed sites identified as potential housing sites and their expected housing yield. Whilst we cannot at this stage ascertain whether the SHLAA

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sites referred to in this table correlate with the Annual Monitoring Report and indeed the 2007 Urban Capacity Study, it is our view that there will be some commonality and so the reliance on these sites is likely to be at odds with Government Policy. We shall elaborate on this objection in relation to the specific housing policy below.

We note that the last two rows in the Table at paragraph 4.6 set out figures with and without Green Belt releases. The text to this section of the Core Strategy should, for reasons of clarity, explain that Green belt review will be necessary in order to deliver the required housing.

Paragraph 4.9

The table on page 40, which sets out the settlement tiers, is supported. Rayleigh, Rochford/Ashingdon, Hockley/Hawkwell are clearly the largest settlements in the District and they benefit from good employment, housing, leisure, community and public transport provision. These settlements are the most sustainable ones with the greatest mix of uses. Consequently, it is sensible that the Core Strategy identifies these as top tier settlements and is able to target them with growth accordingly. This component of the strategy is justified by reference to sustainability data and is effective, since targeting development at these locations will ensure a more sustainable pattern of development.

Paragraph 4.14

We maintain that the strategy for redeveloping the Eldon Way Industrial Estate for housing and other alternative uses to employment is unsound. It is neither justified nor effective. The Industrial Land Availability Study 2006 sets out on page 7 strategic objectives. The 3rd objective seeks to Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive. Clearly the strategy as currently drafted envisages major changes to existing industrial estates, including alternative uses. This strategy is not consistent with other strategies and evidence based studies and so cannot be justified in the context of the tests set out in PPS12. It is also an ineffective strategy since the new employment locations that would free up the Eldon Way site for redevelopment relies on transport infrastructure that has no certainty of being delivered. Principally, the erosion of employment uses at Eldon Way could make the settlement of Hockley/Hawkwell less sustainable and thus conflict with the tiered approach on page 40, paragraph 4.9.

Policy H1

Prioritising the use of previously developed land ("pdl") is supported in principle. It is a justified strategy in the context of PPS3 and effective as sequential choices can be made by implementing the policy. However, the District Council is also promoting a strategy which seeks the redevelopment of existing employment locations to alternative uses and by consequence is identifying green field sites for new employment development elsewhere (Policy ED4 refers). This 'land swapping' is not considered consistent with PPS3, nor is it considered to be justified or effective in delivering the desired strategy. This is particularly the case as most of the existing employment sites are occupied and therefore unavailable for redevelopment. In addition, the new Greenfield sites are in an arguably less sustainable locations away from the top tier settlements identified on page 40 of the Submission Core Strategy. Clearly this element of the strategy is inconsistent with the wider strategy.

The Industrial Land Availability Study 2006 is included as an evidence base by the District Council. It includes an introductory section, which explains that the authority wishes to make Rochford the place of choice for new business. It includes several strategic objectives on page 7 including "Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive." It reviews existing employment areas and identifies vacant land, including land available from allocations. It does not include any assessment of new sites or potential opportunities for new sites that might have been expected to feed into the Core Strategy. The strategy for identifying Green Belt site employment allocation does not appear to be based on any evidence in this document and in that context cannot be justified. The strategy being promoted potentially conflicts with Government policy in PPG13, PPG2 and emerging PPS4.

The Employment Land Study 2008 is a much later document. It has a key recommendation on page ii "we recommend that Rochford District Council adopts strong policies to protect existing employment land." Furthermore under recommendations for existing sites on page iii-iv of that document it states "In our view, Hockley Trading Centre is a strategically well placed employment location. However, we recognise the ambitions of the Hockley Town Centre masterplan and that within this the Council should consider it to be allocated for other uses. However, we recommend that this reallocation happen only if provision is made within the masterplan for office use within Hockley Town Centre as part of a mixed use scheme." The view of the writers of this document is clear - the Eldon Way Industrial estate (Hockley Trading Centre) is a good employment site and that it is for other reasons that alternative uses are being considered and only then if office development is supported. This supports our representations that new future uses at the Eldon Way site should be employment dominated and that alternative uses should relate to the objectives of the Town Centre which is to enhance the shopping and leisure facilities. Residential is not an appropriate alternative.

This document recommends the use of land to the west of Rayleigh for employment and envisages Green belt release. However, the SCS does not explain through the evidence base why existing employment sites should be 'deallocated' and Green belt land unnecessarily used.

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In addition to these key issues we have some specific concerns. As a consequence we maintain an objection to the second paragraph of Policy H1. This policy states that the Council will seek the redevelopment of various industrial estates including Eldon Way. The Policy says that alternative uses will be sought (presumably alternative to the existing employment offer) and that new land will be allocated elsewhere. This policy statement, in relation to Eldon Way in particular, is unsound for a number of reasons:

The emerging Hockley Area Action Plan consulted upon in 2008 states that the Eldon Way Industrial Estate is strategically well placed. In a sense this statement underplays the true importance of this highly sustainable employment location and only major employment area in Hockley/Hawkwell. The employment area is adjacent to the railway station and located a short distance from the main bus routes that run along Spa Road. Some of the residential areas of the town are also within walking distance of this commercial area, thus providing a potential for sustainable travel by employees. The Eldon Way Industrial Estate is therefore right at the heart of the settlement of Hockley/Hawkwell and provides an opportunity to meet sustainable transport objectives by reducing the need to travel by car. Consequently, this employment area should be highlighted as a premier employment site in sustainability terms, both in the context of PPG13, PPG4 and PPS6. To encourage alternative uses as set out in Policy H1 implies the removal of the majority of employment based activity at Hockley/Hawkwell and this would be contrary to National policy, would not be the most appropriate strategy when considered against alternatives and is therefore unsound.

Whilst it is acknowledged that improvement to the Eldon Way Industrial Estate can and should take place, the extent to which the mix of employment uses should be altered in favour of alternative land uses requires careful consideration. It is our view that a mix of existing or indeed new employment land uses with some Town Centre type uses should dominate the Eldon Way site. A mix of employment types between offices, light industry and other high technology industries should be encouraged as this will provide many locational advantages to the firms that agglomerate together. The Council says that the existing uses on this site are harmful to amenity. However, the site has operated for many years without any significant issues and if renewal for B1 type uses are encouraged then the employment area can be maintained without harm to amenity. Renewal of the employment stock can help develop and improve trade, improve the sustainability of businesses as a whole and make for a more flexible labour market as skill levels are varied. A singularly different use altogether or a variety of uses which excludes employment could undermine the long term sustainability of the area and Town Centre. As such Policy H1 is not an effective strategy and should be amended to acknowledge the importance of Eldon Way and the need to renew the employment stock to ensure that the site maintains its important role as a employment site, albeit with some ancillary alternative use development where appropriate.

The 2008 Retail Study notes that Hockley Town Centre is not strong and there is trade leakage. Eldon Way Industrial Estate provides a customer base for existing town centre uses. Weekday spending within town centres is an important contributor to the viability of many retail and leisure businesses either through expenditure by employees during the lunchtime trade or expenditure by employers, on necessary goods and services. This relationship helps sustain the critical mass of a centre and provides a platform for new retail and leisure growth. It is important to have a balanced centre with a variety of uses. Policy H1, as currently drafted, implies the removal of employment related development and this is likely to harm the vitality and viability of Hockley Town Centre. The Council has presented no evidence to suggest that this is not the case. Importantly, the 2008 Retail Study explains that there is a need for additional retail and office space. In principle we would support additional office and other B1 type uses plus retail but employment uses should always dominate for the sustainability reasons given above. Retail and office development are likely to present a viable alternative to some of the more industrial type uses.

Consequently, we do not support the phrasing of the third paragraph of Policy H1 and maintain that the most appropriate strategy is to seek renewal of the employment stock with employment based uses and with some new retail development. Removal of employment land uses completely as currently implied-which was the approach adopted in the emerging Hockley Area Action Plan - is not a justifiable strategy.

One of the key tests of a Core Strategy is consistency between policies in the emerging Plan and this strikes at the heart of demonstrating an effective strategy. Policy H1 implies alternative uses to employment and the relocation of Eldon Way to a site identified under Policy ED4. However, Policy RTC6 sets out a suite of policy criteria for Hockley Town Centre which includes employment and commercial activities. In addition Policy ED3 seeks the protection of sustainable employment sites (Eldon Way) and notes that some reallocation of existing employment sites will include a proportion of employment. It notes that in the case of Eldon Way employment development will form a component. The policies appear at odds with one another. The third paragraph of Policy H1 should be deleted as the second paragraph is sufficient to set a strategic context for delivering new housing development. The employment policies and Hockley specific policies should be left to consider the type and quantum of land uses appropriate in the area. If the third paragraph of H1 is to be retained then it should tie in more with Policy RTC6 and in our view explain that employment uses should dominate any redevelopment proposals for the Eldon Way site and that retail and leisure uses should be a supporting proportion.

Implementation, Monitoring and Delivery - page 132 onwards

One of the key tests of soundness is that the Core Strategy should be effective - it should be able to deliver its strategy. The Implementation strategy set out at page 132 onwards of the Core Strategy does not explain how Policy H1, RTC6 and the strategy for redeveloping Eldon Way (Policy ED2 and ED3) will be delivered. The comment at Policy ED3 on

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page 161 identifies it as a potential risk and alludes to land assembly difficulties and the choices to be made by owner/occupiers. In order to deliver the strategy there should be a clear understanding as to whether the new land use values being promoted are sufficient to encourage relocation voluntarily. Secondly there is a need for more information to be gathered and presented to show that current occupiers and landowners are willing to relocate and the timescales likely for this. For example, do the building lease contracts enable early review or are there any break out clauses. There should be some commentary on whether the Council will engage in compulsory purchase orders to pursue their strategy should the 'encouragement' route fail. As currently drafted there is no clear path to deliver the strategy and the danger is that despite reallocation, the sites identified for redevelopment will not come forward in the plan period. In this regard, evidence to satisfy the test of soundness is not provided.

Policy H2 - General Locations

We support the strategy that new housing growth should be targeted at land South of Hawkwell. This area is suitably located to the urban area of Hockley/Hawkwell and to tie in with the settlement tiers on page 40 of the Submission Core Strategy the same terminology for settlement should be used. This ensures a consistency within the SCS. The choice of this location as a housing growth area is appropriate as it would not contribute to the coalescence of the urban area with Ashingdon (there is existing development between this identified housing area at Rectory Road and Ashingdon and moreover, Rectory Road can form a natural physical boundary for the new Green belt boundary. This area is also well located to the existing road network. Cherry Orchard Way has recently been improved and provides much better accessibility to the proposed housing growth area than any other location around Hockley/Hawkwell. The existing bus routes along Rectory Road also make this location sustainable and the additional housing proposed will help underpin the financial viability of bus routes in this area. Locally there are employment opportunities, including the small commercial estate off Main Road. The Eldon Way Industrial Estate adjacent to the Town Centre also provides the opportunity for employment locally. Extensive public open space, play pitches and built leisure facilities are located just to the north of this area and a community hall is located off Briar Close, nearby. The area to the south of Hockley/Hawkwell is close to local shops on the corner of Heycroft Road and Main Road and there are numerous footpath links between this area and the local community including links via Thorpe Road, Thorpe Close, Briar Close, Hawkwell Park and Park Gardens. The area therefore provides the opportunity to enhance existing links, including cycle links, and contribute towards community integration - more so than other sites on the south side of this settlement. The site is also in the control of one house builder and deliverable.

However, we find that the Policy is not fully consistent with national policy and furthermore needs to be reviewed in order to be justified and effective. We have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with this policy and feel that Green Belt review should be more explicit throughout the SCS. We note that it is only Policy H3 which indicates the need for Green Belt land review. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H2 and certainly Policy H3 and Policy GB1 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary.

Policy H2 - Phasing and Quantum

The 2008 Preferred Core Strategy document indicated that the area south of Hawkwell should deliver 330 dwellings over a phasing period to post 2021 (see Policy H2 and H3 of that document). The SCS reduces the quantum of housing in this area to 175 but expects delivery by 2015. At a broader level the Preferred Options Core Strategy of 2008, (Policy H2) required 1,450 dwellings to 2015 and a further 1,050 by 2021. In the SCS the figures are now 775 and 1,010 respectively.

Since the SHLAA post dates the publication of the SCS, we are uncertain as to the reason why such a significant reduction in quantum of housing and extensions to the residential envelope is considered necessary. Presumably it is the 'new' strategy to redevelop existing employment areas within the settlements that has led to this change. Our representations on this strategy and specifically the Eldon Way Industrial Estate are included elsewhere within our representations. Previously we have commented on the Table at paragraph 4.6 of the Submission Core Strategy and the lack of evidence to underpin that table. It seems odd that in the space of a year the expected requirement for Greenfield sites has effectively halved on the basis of a SHLAA exercise. The community is therefore not able to effectively

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comment on the housing land supply and at this stage the Submission Core Strategy is legally unsound.

That said, we are of the view that the quantum of housing envisaged south of Hockley/Hawkwell should be more than the 175 currently envisage. In coming to this view we have reviewed the Urban Capacity Study and the latest housing figures in the Annual Monitoring Report 2008. We conclude that the shortfall in housing land supply is such that 330 dwellings in this location is appropriate.

The recently published SHLAA is based upon the data obtained from the Urban Capacity Study 2007, a call for sites exercise and data from the Annual Monitoring Report 2008.

The 2007 Urban Capacity Study (UCS)

1. 2007 is widely recognised as being the peak level of house prices in the UK and it was acknowledged by Government and practitioners alike that 2007 house prices were at an unsustainable level. It is our view that utilising the 2007 UCS as an evidence base without reference to the market does not pick up the depressed demand that is likely to now exist. Recent corrections to the housing market now mean that housing land prices are at a much lower and arguably more affordable level than before. The implications are that some pdl may not be viable for housing development. Often brownfield sites have much higher development costs than Greenfield sites and so the yield from urban capacity will be much lower than anticipated in the 2007 study. One example is the employment allocation of the Adopted Local Plan located at 76-92 Main Road, Hawkwell. This site has been allocated for several years and has been available during the most recent rises in residential property prices during 2006-07. As a consequence the lack of progress on the site can only be described by its current occupancy and perhaps it comprises high value uses that do not encourage redevelopment. Despite this the site is identified as having high potential for alternative use and high potential demand. The SHLAA form notes that there is no information on legal constraints (e.g., tenancy agreements) As a consequence it is difficult to see how this could continue to be a potential site and as a consequence the allowance for green field releases should be increased.

2. There are considered to be other instances in the UCS and the recently published SHLAA where the assumptions and calculations would indicate that the 1301 urban capacity figure is over optimistic and the SHLAA assessment is limited. In the assessment of 'non-residential sites in appropriate locations' within the UCS assumptions are made as to the probability of sites coming forward for new housing. 68-72 West Street, Rochford is identified as a high probability site but we note that it has been subject to 7 refusals of planning permission/conservation consent. There is a significant gap between the urban capacity identified as being suitable by the Council and the capacity applied for by the owners. Given its alternate use value, it is debateable whether the two capacity figures can be reconciled. No 247 London Road is another example of a site allocated in the Local Plan but which hasn't come forward. This is now the subject of a proposal for a care home and if approved would further limit the scope for market/affordable housing capacity on the site. A striking example of how the urban capacity study has underestimated is also evidence by 2-4 Alderman's Hill, Hockley - described as a disused service station. There has been no residential development application on this site since 2004 and most recent applications have sought commercial use of the site. Rather than being evidence of housing land deliverability, this particular site evidences the need for commercial uses in the area. There are therefore deliverability doubts over these 'high probability' categories which amount to some 40 units.

3. In relation to the assessment in the UCS entitled 'intensification of existing residential uses' we note that the assessment is premised on an assessment of recent trends taking into account net completions between 2001-2006 and 2005-06. This is effectively an assessment of windfall trends and not an approach that PPS3 encourages. Importantly Table 3-12 in the urban capacity study seeks to project forward urban capacity from residential redevelopment - a period that benefited from high house prices and PPG3 guidance encouraging redevelopment. These two circumstances have markedly changed and so the assumptions and conclusions drawn would also have changed. Even taking into account the UCS discounting, the reliability of the 404 units from this source must be questioned and in our view the 1301 figure cannot be a sound basis for urban capacity and further Greenfield releases are necessary.

4. In the section of the UCS entitled 'subdivision of dwellings' and 'living above the shop' it is estimated that recent trends would result in 7 and 15 units. Our concerns with using trends as a basis for urban capacity are detailed above - PPS3 does not encourage this. Rather, local authorities are charged with surveying their areas, identifying which areas may yield urban capacity and how much and developing policies to achieve that. Government guidance does not encourage the estimation of windfalls in the way the UCS does.

5. Redevelopment of established employment land is a separate section within the UCS. At 1 above we identify the low probability of the Main Road residential allocation coming forward. This remaining section of the UCS considers 11 further employment sites which were first identified in the 2000 UCS. Three of these are considered to have a high probability of coming forward. We have looked at these three sites and can find no evidence that they are likely to come forward. In the 8 years between 2000 and 2008 the three identified high probability employment sites have not been developed and there is no reason to assume that the next 5-10 years will be any different. For example the Rawreth Industrial Estate is identified as being well used in the UCS and although it has some unneighbourly uses there is no indication that the site is available, suitable or deliverable for residential. Land between 39-69 Lower Lambricks, Rayleigh is identified as having a high probability of residential uses. Yet there is no

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evidence of any pre-application advice or planning applications for this area. Stambridge Mills, Mill Lane, Stambridge is a further example. This site is separated from the urban area, in a flood risk zone and protected in the 2006 Replacement Local Plan by Policy EB9 which promotes B1 uses. Against this background there is only two relevant planning applications affecting this area both date from the early 1990's and relate to a plant room and loading bay. There is no evidence that this is likely to come forward for residential purposes in the next 5-10 years.

6. In the UCS extant permissions are identified as 856 dwellings. It is important to note that this figure needs to be continually reassessed so that from the point of adoption of the Core Strategy a 5 and 10 year housing land supply is available. The SHLAA notes extant permissions for 2009-14 being 106. As noted below extant permissions do not necessarily translate into deliverable sites. There is therefore a contingency that needs to be built in. Further allocations on greenfield land need to be increased and as such the quantum of housing in the area south of Hockley/Hawkwell should be increased to 330 dwellings in order to begin to meet the shortfall identified.

The District Council's 5 year housing supply assessment

7. The District Council's Annual Monitoring Report ("AMR") 2008 purports to demonstrate a 5 year housing land supply. The preamble to Table 4.10 in the AMR 2008 explains that Rochford District Council ("RDC") has included units under construction, units with full permission, units with outline permission, units with a resolution to grant, units subject to preapplication discussion/Urban Capacity Assessment and land allocations in its trajectory. The reader is referred to Appendix B which breaks down the sites in more detail. The recently published SHLAA also includes a table showing a potential 1273 dwellings deliverable. However, it refers to "appropriate brownfield sites." Since these 'appropriate sites' are do not benefit from an application or a planning permission it is difficult to programme them into the housing delivery trajectory.

8. In the full planning permission category of the AMR 2008 where work has not yet started there can be no guarantee that all these sites will be delivered in the 5 years. This comment relates to the one above in relation to the recently published SHLAA. It is not uncommon for permissions to be obtained to provide a means for valuing a site where the owner has no immediate plans to sell the site or develop housing. Delivery may also be hampered by funding constraints, or site assembly problems (where sites are in an alternative use or relocation constraints). Appendix B of the AMR 2008 does not set out the intentions of the landowner or whether the sites are truly achievable in the 5 year period as per PPS3 requirements. The SHLAA purports to show developer intentions at Appendix C but the assessment by the local authority into the legitimacy of some of the claims is not presented. The evidence base is not as full as it should be to demonstrate the robustness of Table 4.6 of the SCS. It is also unclear the extent to which this table is based on either the UCS 2007, AMR 2008, SHLAA 2009 or a combination of all three. This should be set out clearly.

9. In addition, to the 'non delivery' of a proportion of new homes in the AMR 2008, there is concern at the timings of delivery in that data set, for example, 10 units in 2008-2009 relates to outline planning permissions and it is doubtful whether reserved matters can be turned round quick enough to begin delivering housing in this year period. There could well be examples in that set of data where the delivery of units in the first year of the 5 is unlikely, thus delivery is reduced for that period and pushed back and this process is then compounded throughout the data set up to and beyond year 5. Statistical evidence from the Department of Communities and Local Government ("CLG") reveals that building starts are 43% down on the quarter to March 2009 compared with March 2008. It is not clear whether the recently published SHLAA has taken this into account and unless it does the data in the Table at 4.6 of the SCS cannot be relied upon, particularly given the current recessionary circumstances. In relation to the Table at Paragraph 4.6 a refinement is therefore needed to take into account this effect on phasing.

10. This problem is compounded for other units relied upon where permission has been granted but no start on site has been made; this accounts for a considerable number of sites in 2009-10 period (100 dwellings) which is (year 2 of the 5 year period). A delay in these will require more Greenfield sites to be identified in order to meet the shortfall.

11. Finally we note that the East of England Plan expresses its land supply requirement as a minimum. This strategy is not reflected in the

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Submission version of the Core Strategy policy H2.

12. In summary since neither the UCS nor the Annual Monitoring Report form a SHLAA, reservations are maintained about the degree to which sufficient housing land has been identified.

Policy H3

In the Preferred Options Core Strategy 2008 more locations were identified for housing growth in the post 2021 phase. Whilst it is our view that land south of Hockley/Hawkwell should benefit from a greater number of dwellings than the 175 currently identified (330) in order to make the strategy effective. We are concerned at the significant change in strategy between the Preferred Option Core Strategy and the Submission version, which has significantly less housing growth on green field sites. This change in strategy is so significant that we would question whether it is appropriate in the context of soundness and the consultation processes that have taken place so far.

We also have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with other policies in the SCS and feel that Green Belt review should be more explicit throughout the SCS. As it currently stands there is a potential conflict with national policies and limited justification for the Green belt strategy. We note that in Policy H3, which indicates the need for Green Belt land review, the advice is limited and unclear. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H3 and Policy GB1/H2 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary. Not to do so is unsound for justification and effectiveness reasons.

Policy H4 - Affordable Housing

As currently drafted we feel that the policy is not concise enough and that the policy does not reflect current guidance. The phrase 'at least' would indicate that in most cases affordable housing above 35% will be sought. Our understanding is that the 35% figure is recommended in the SHMA and that to provide a policy framework which seeks to go beyond that figure would potentially be unworkable as many sites could not financially bare the burden of over a third of the net developable area not yielding a value. The policy should be redrafted so that "a target of 35% affordable housing shall be provided on all developments of 15 or more units..."

The last policy paragraph provides some scope to relax this policy, if there are clear site constraints that make on site provision impossible. The policy, though, is not particularly clear on what would constitute exceptional circumstances. For example, physical site constraints, which unusually raise development costs, would be one such reason and this should be specified. There may be other reasons including the nature of housing needs in the part of the District the site is located which justify affordable housing below the 35% target. Design reasons may also have a bearing on how provision is made and in what form, particularly if the site is in an historic area where design might override housing need argument. It is therefore recommended that the policy expand on the type of circumstances where affordable housing may be relaxed and the type of information that will be sought of applicant's who have a need to invoke this part of the policy.

Policy H5

In support of the policy, it is advantageous that no percentages requiring a specific mix are included. This flexibility will enable developers and the Council to respond directly to changing circumstances in the local housing market. In the past some authorities have set out a percentage for the type of housing they require only to find that after a few years of strict implementation there is an oversupply of property of that type and no flexibility in the policy to address the problem.

Policy ED2 - London Southend Airport

It is considered that to grow non aviation related employment at a location north of Southend Airport where sustainable access from the rest of Rochford District requires careful consideration. Most Airports are serviced by aviation related employment development and as such a location close to the airport is sensible and sustainable. However, for surface access reasons it would be inappropriate to encourage travel from Rochford's main settlements to what essentially

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would be a rural location for general employment uses. Whilst sustainable access would be improved by a railway station and better bus links, there is no evidence to suggest that a sustainable surface access strategy for non related employment development at the Airport can be achieved. Paragraph 11.22 explains the critical importance of a railway station to the delivery of the strategy yet the Transport Chapter and Implementation Chapter provide neither a policy nor an assessment of deliverability. It is also notable that the South Essex Rapid Transit Policy T4, as set out at paragraph 10.16, notes that Rochford is not proposed to be served but may be served in future phases. This uncertainty is no way to plan for a major employment land supply strategy in the District. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley/Hawkwell, Rochford and Rayleigh is unsound.

Policy ED3

We fully support the first sentence of the Policy and note the apparent contradiction with the statements in Policy H1 and elsewhere which seeks to develop on alternative uses at industrial estates such as Eldon Way.

This contradiction is evidence in the second paragraph of Policy ED3. In our representations on Policy H1 we have explained why it is not sound to diminish the employment stock at Eldon Way and the importance of maintaining a dominance of employment type uses at this estate. These arguments are not repeated here.

We note the sentiments of the third paragraph and in accordance with our representations elsewhere are of the view that this sentence should be revised to explain that Eldon Way will accommodate principally employment type uses. As noted elsewhere uses which are an alternative to employment would diminish this highly sustainable employment site and this is unsound when assessed against National Policy.

Policy ED4 - Future Employment Allocations

In part, the de-allocation strategy is not supported as it is considered unsound when set against sustainability criteria. In relation to the Eldon Way Industrial Estate it is considered critical to the ongoing sustainability of this settlement that employment uses are maintained at this location. It is close to the railway station, bus routes and local residential areas from which the opportunity exists for employees to walk or cycle to work. Its location adjacent to the Town Centre offers opportunity for some retail and leisure development to complement the centre and to maintain a supporting function. These sustainable benefits would not occur with the deallocation of Eldon Way or the significant erosion of its employment floorspace. Whilst redevelopment of the employment site to achieve new employment is supported, the dominant land use should continue to be employment use. As a consequence, the 18ha of land required for employment in this policy is considered to be excessive and the policy should be reviewed to explain that redevelopment of existing employment sites for primarily new employment development will be encouraged.

Policy T4

It is noted that the South Essex Rapid Transit policy, as elaborated upon at paragraph 10.16 notes that Rochford is not served but may be served in future phases. This uncertainty is contrary to the delivery principles of soundness and directly puts at issue the employment land supply strategy in the District which is founded on sustainable access to new sites. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley, Rochford and Rayleigh is unsound.

Appendix H1, CTL1 - Infrastructure

It is recognised that necessary infrastructure provision is an important part of creating a sustainable development and in that context appendix H1 is supported. The supporting text notes that the table at Appendix H1 is not exhaustive and in that context it is very important that the framework properly distinguishes between what should be provided as part of new development schemes and what shouldn't. It is therefore essential that the framework acknowledges the importance of Circular 05/05 and the tests which say that provision of infrastructure and/or contributions should be:

- * Relevant to planning
- * Necessary to make the proposed development acceptable in planning terms
- * Directly related to the proposed development
- * Fairly and reasonably related in scale and kind to the proposed development
- * Reasonable in all other respects

As is made clear (Paragraph B9 of Circular 5/05) contributions should not be used to make good existing deficiencies in infrastructure provision. Nor are they to be used to secure contributions to the achievement of wider planning objectives that are not necessary for consent to be granted. In that context the Core Strategy should set this out as its policy framework.

Policy GB1 - Green Belt

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The objectives of this policy are supported, although as noted in other representations the SCS is unsound as it does not meet the tests in relation to justification, compliance with national policy or effectiveness of strategy.

Policy GB1 mentions the objective to allocate the minimum amount of Green Belt land necessary. The policy should link to the requirements of PPG2 and RSS which are discussed in relation to the representations on Policy H2 and H3. The policy should set out a timeframe for the review and why Rochford requires a Green Belt review (what the exceptional circumstances are in this District that justify a review of local boundaries. The policy should be amended to set out a 2031 time frame and this may require the SCS to have an extended life span beyond 2021.

We would recommend the deletion of the word character since Green Belt designation is not related to landscape character as currently drafted. For clarity we would also recommend that the Policy or its supporting text explain that a Green Belt review will take place in support of an allocations document (paragraph 6.6) in order to identify an appropriate new boundary. This is particularly necessary given the commitment to a Green belt review in the adopted Local Development Scheme.

Policy CLT1 - Planning Obligations and Standard Charges

In view of the need to test fully the basis on which standard charges are based it is important that any document produced is in a development plan document that enables an examination in public. The policy should explain this in order that when the document is produced it accords with Policy and is based on sound evidence.

ENV9 - Code for Sustainable Homes

Object. The advice from the Department of Communities and Local Government is that the new requirement to have a rating against the Code does not make it mandatory to build a Code home or to have each new home assessed against the Code. It does however mean that all buyers of new homes be given clear information about the sustainability of the new home. A house builder can do this in one of two ways:

- they can choose to build a Code home, have that home assessed against the Code and provide the home buyer with a Code certificate stating the star rating the home has achieved
- or, they can choose to build to current building regulations standards, not to pay for an assessment and instead download a nil-rated certificate of non-assessment (also referred to as a nil-rating) to provide to the home buyer.

As such the Rochford policy requirement that coding 3 be achieved by 2010 and Code 6 by 2013 is out of step with Government advice. The policy wording should explain that it is just the coding that is a requirement of new homes and not necessarily that new homes should be constructed to achieve a standard.

The current Government objectives are for the code to be introduced over a reasonable period with development to be code 3 by 2010, code level 4 by 2013 and code level 5 by 2016. In this regard the policy, as drafted, seeks to achieve code 6 by 2013 and consequently compresses the code requirements into a shorter time scale with the costs associated expected to be subsumed within the housing market through higher prices. This is not a realistic strategy for the delivery of sustainable homes and we consider that the policy should be revised to extend the period of compliance but to also make it more flexible based on local circumstances.

Research undertaken on behalf of the Housing Corporation and English Partnerships, published in February 2007 'A cost review of the code for sustainable homes' reveals that code 6 is unlikely to be unattainable given existing technologies and that achieving code 5 could result in a 12% to 20% increase in costs that would have to be passed onto the consumer. Given the variability of the housing market with peaks and troughs, it is unlikely that the housing market would be able to subsume this level of price increase.

The code system policy as currently drafted does not have regard to site circumstances and so many of the requirements could be difficult to meet. For example, micro electricity generation on site may be difficult to achieve where local circumstances deter the capture of wind or solar power. If more expensive technologies are required to generate power than is the norm then costs will rise. There may be other competing reasons why designs cannot include certain sustainability measures if housing sites are in sensitive landscape and historic locations. Alternatively there may be significant development costs associated with site specific circumstances and so viability of the site's development becomes a valid consideration. By insisting on the code for sustainable homes other policy objectives such as affordable housing at particular rates and other contributions may need to be reconsidered. Consequently, we are of the view that this policy should be drafted in a manner which enables site specific circumstances to be taken into account. As noted above the Government explains that the code is a certification requirement and does not necessarily mean that buildings are constructed in accordance with a code level.

It is also important to note that it is not the purpose of planning legislation to duplicate other legislation. In this regard, the policy should accept that the Building Regulations will be the main vehicle for implementing this policy and that unless the coding requires external development then there will be no need to specify what is to be carried out in a planning application.

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O - 16923 - 10009 - Policy ED2 - London Southend Airport - iii

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Summary: Policy ED2 - London Southend Airport

It is considered that to grow non aviation related employment at a location north of Southend Airport where sustainable access from the rest of Rochford District requires careful consideration. Most Airports are serviced by aviation related employment development and as such a location close to the airport is sensible and sustainable. However, for surface access reasons it would be inappropriate to encourage travel from Rochford's main settlements to what essentially would be a rural location for general employment uses. Whilst sustainable access would be improved by a railway station and better bus links, there is no evidence to suggest that a sustainable surface access strategy for non related employment development at the Airport can be achieved. Paragraph 11.22 explains the critical importance of a railway station to the delivery of the strategy yet the Transport Chapter and Implementation Chapter provide neither a policy nor an assessment of deliverability. It is also notable that the South Essex Rapid Transit Policy T4, as set out at paragraph 10.16, notes that Rochford is not proposed to be served but may be served in future phases. This uncertainty is no way to plan for a major employment land supply strategy in the District. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley/Hawkwell, Rochford and Rayleigh is unsound.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** iii

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O - 15841 - 4951 - Existing Employment Land, 11.32 - i, ii, iii

15841 Object

CHAPTER 11 Existing Employment Land, 11.32

Respondent: Hockley Residents Association (Mr B Guyett) [4951] **Agent:** N/A

Hockley Residents Association
2 Tonbridge Road
Hockley
Essex
SS5 5HL

Full Text:

Previous consultations ignored by RDC:

i. The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

i. The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

Summary:

Previous consultations ignored by RDC:

The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

Change to Plan Review policy

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 15948 - 9032 - Existing Employment Land, 11.32 - i, ii

15948 Object

CHAPTER 11 Existing Employment Land, 11.32

Respondent: Essex Chambers of Commerce (Mr John Dallaway) **Agent:** N/A
[9032]

Essex Chambers of Commerce
2nd Floor,
Viscount House,
London Southend Airport, Southend-on-Sea.
Essex.
SS2 6YF
01702-560100

Full Text: Stambridge Mills Industrial site will be unsustainable for housing due to flood risk and the potential mitigation costs and therefore should be retained for light industrial use. Alternative site for housing needs to be allocated.

Summary: Stambridge Mills Industrial site will be unsustainable for housing due to flood risk and the potential mitigation costs and therefore should be retained for light industrial use. Alternative site for housing needs to be allocated.

Change to Plan Do not believe this site is sustainable or deliverable for housing and an alternative site should be allocated. Stambridge Mills should be actively marketed as a light industrial site.

Appear at exam? No **Soundness Tests** i, ii

Core Strategy Submission Document

O - 16023 - 10324 - Existing Employment Land, 11.32 - i, ii, iii

16023 Object

CHAPTER 11 Existing Employment Land, 11.32

Respondent: Mrs Jennifer Abbey [10324]

3 Claybrick Avenue
Hockley
Essex
SS5 4PS
UK
07768 542634

Agent: N/A

Full Text:

Previous consultations ignored by RDC:
â€¢ The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

â€¢ The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

Previous consultations ignored by RDC:
The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

Change to Plan Revise policy

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16259 - 9177 - Existing Employment Land, 11.32 - i

16259 Object

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Respondent: Colonnade Land LLP [9177]

Colonnade Land LLP
Fifth Floor
17-19 Maddox Street
London
W15 2QH
020 7255 7490

Agent: Icen Projects Limited (David Churchill) [10057]

Icen Projects Limited
83 Victoria Street
London
SJ1H 0HW

Full Text: ROCHFORD DISTRICT COUNCIL - LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY SUBMISSION
SEPTEMBER 2009

Icen Projects Ltd (Icen) has been instructed by Colonnade Land LLP (Colonnade) to submit representations to the Rochford Local Development Framework Core Strategy Submission (CSS).

a) Overview

It is our conclusion that the CSS is not justified, effective or consistent with national policy, as required by Planning Policy Statement 12: Creating Strong Safe and Prosperous Communities through Local Spatial Planning (PPS12) and is therefore vulnerable to being found unsound by an Inspector through the Examination in Public.

b) Background and Summary

These representations follow those made by Icen on behalf of Colonnade to the Preferred Options Core Strategy, submitted via letter dated 17 December 2008. In this regard, we would request that the Council confirms that the representations made to the Preferred Options Core Strategy will be taken into account alongside the current representations, particularly as there are a number of cross references between the two sets of representations.

It is not considered necessary to reiterate the content of the previous representations, as they were made at the appropriate stage and will be considered by the Planning Inspectorate in due course, but it is inevitable that certain elements will require restating where it is not clear that they have been taken into account in the production of the CSS. For clarity, therefore, Colonnade feel that it is appropriate to clarify the 'in-principle' issues that were raised in the representations to the Preferred Options Core Strategy, recognising that these issues were raised in the context of a wider and more coherent justification made within the representations:

- â€¢ Further cross-referencing of the recommendations made within the evidence base is required;
- â€¢ Greater focus should be placed on promoting Rochford as the principal settlement within the District;
- â€¢ Coombes Farm is the most logical location for residential development abutting the urban area of Rochford and as such warrants recognition as a general location for residential development;
- â€¢ The allocation of Three Ashes Farm for employment generating uses will be pursued;
- â€¢ Recognition that it is not realistic to expect residential allocations to be met mainly on Brownfield sites, nor should the intensification of smaller sites in residential areas be pursued;
- â€¢ Many of the sites identified as suitable for residential development will not be viable and will not come forward for development within the timescales anticipated;
- â€¢ The failure to provide the necessary justification for the proposed infrastructure improvements sought in Appendix H1;
- â€¢ The inclusion of an affordable housing exception policy was sought; and
- â€¢ The need to identify sites capable of delivering employment growth in the short term.

Following assessment of the CSS presented by the Council for consultation prior to submission to the Secretary of State, Colonnade considers the Plan to be 'unsound' as the document consistently fails to meet the tests of soundness set out in the table following Paragraph 4.52 of PPS12. For clarity, PPS12 confirms that to be 'sound' a Core Strategy should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY and defines 'justified' as "founded on a robust and credible evidence base" and "the most appropriate strategy when considered against the reasonable alternatives" and 'effective' as "deliverable", "flexible" and "able to be monitored".

The rationale for the above is identified in the remainder of these representations, which are provided in the interests of ensuring the Council delivers a strong, robust and logical Core Strategy that guides the future development of the District in a justified and effective manner.

b) Colonnade

As the Council is aware from previous submissions to the Local Development Framework, Colonnade is a strategic land company with a particular interest in the future development of the District as a consequence of a number of sites that it controls, particularly around Rochford.

The Council will also be aware that Colonnade has recently submitted an outline planning application for the residential development of the land at Coombes Farm, Rochford to provide a sustainable urban extension comprising up to 326

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CHAPTER 11 Existing Employment Land, 11.32

residential dwellings, with associated accesses and community uses. Whilst the planning application process is clearly separate from the Local Development Framework production process, Colonnade wishes to continue the promotion of the site as a suitable location for residential development.

Accordingly, these representations focus on the legal requirements and tests of soundness associated principally with the Housing and Employment chapters of the CSS, with reference where appropriate to the sites that are controlled by Colonnade, the outline planning application at Coombes Farm and other issues where relevant.

c) Housing

i. Date of Adoption

The CSS assumes an adoption date of 2010 and plans for the provision of housing to 2025.

Taking account of the potential delays to the adoption of the Plan, including the Examination process, it would be more appropriate for the CSS to provide sufficient flexibility to allow for delays in its adoption. Colonnade considers an adoption date of 2011 for the CSS is a more realistic target.

Taking account of the advice in Paragraph 4.13 of PPS12, which states that the time horizon for the Core Strategy should be "at least 15 years from the date of adoption" it would be appropriate for the CSS to plan for the provision of housing to 2026 at the earliest. As such, Colonnade does not consider the CSS to be 'flexible' in the context of the tests of soundness in the table following Paragraph 4.52 of PPS12.

ii. Housing Delivery

However, setting the above aside, the Housing Chapter identifies the minimum housing delivery target for the period 2001 to 2021 of 4,600 dwellings as set out in the East of England Plan, with the annual average requirement of 250 dwellings per annum to extend provision from 2021 to 2025. It also confirms that the residual target for the period 2006 to 2021 is 3,790 dwellings, taking account of the delivery of 810 dwellings in the period 2001 to 2006, and a further 618 dwellings have been completed between 2006 and 2008.

This leaves a residual housing provision target of a minimum of 3,172 dwellings in the period 2008 to 2021. Taking into account the required provision beyond 2021, the residual housing provision target in the period 2008 to 2025 is a minimum of 4,172 dwellings. The disparity between these figures and those provided within the CSS are explained by the rounding down of the annual average delivery requirement in the period 2006 to 2021 to 250 dwellings per annum, compared with the actual figure of 252.67.

The table at Paragraph 4.6 of the CSS identifies the source of housing provision that will meet the identified minimum requirements and includes figures for 'Extant Planning Permissions' and 'Existing allocations/other appropriate sites identified in Strategic Housing Land Availability Assessment'. These figures, along with the actual completions within the period are combined to produce the figure for the 'Total without Green Belt release' figure.

Setting aside the concern regarding under-provision associated with the rounding down of the annual average delivery requirement in the period 2006 to 2021, the CSS fails to identify the sites that will contribute to the 'Extant Planning Permissions' provision. The identification of the sites that will contribute to the 'Extant Planning Permissions' should be provided in the context of the findings of the Inspector in the appeal by Asprey Homes [APP/G5180/A/07/2043219/NWF] who determined that the reliance on a delivery rate of 100% is unsafe [IR287].

Furthermore, at the time of writing these representations, the Strategic Housing Land Availability Assessment 2009 has not been published. It is impossible therefore for a full assessment of the proposed housing provision to be undertaken to confirm whether the CSS is 'founded on a robust and credible evidence base' [test of soundness in the table following Paragraph 4.52 of PPS12].

iii. Redevelopment of Employment Sites

Paragraph 4.14 of the CSS refers to the identification of the four employment sites that are considered by the Council to be suitable for redevelopment to residential use. However, the failure to publish the Strategic Housing Land Availability Assessment 2009 either before or alongside the publication of the CSS means that the assumptions made by the Council as to the suitability, availability, viability and deliverability of the sites cannot be assessed.

It has been necessary, therefore, to review the assumptions made in the Rochford Urban Capacity Study 2007 (UCS) regarding the sites. Within the section of the UCS entitled 'Redevelopment of Established Employment Land' [pages 22 & 23] includes a list of those sites assessed, their indicative capacities and the probability of residential development coming forward at the sites within the plan period (identified elsewhere as 2001 - 2021). The list includes the four sites identified in the CSS of Eldon Way/Foundry Estate, Hockley; Rawreth Lane Industrial Estate, Rayleigh; Stambridge Mills; and Star Lane Industrial Estate, Great Wakering.

In total, the UCS identifies an indicative residential redevelopment capacity of 486 units on the four sites (118, 220, 60 and 88 respectively). Of these, it identifies the Rawreth Lane Industrial Estate and Stambridge Mills as having a 'high'

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probability of coming forward for development in the Plan period (2001 - 2021), which would deliver 280 residential dwellings using the Council's own figures. The Star Lane Industrial Estate (referred to in the UCS as the Star Lane Brickworks) is identified as having a 'medium' probability of coming forward for development in the Plan period, with capacity to deliver 88 residential dwellings. It is unclear, therefore, where the figure for 'Existing allocations/other appropriate sites identified in Strategic Housing Land Availability Assessment'.

Set against this is the identification of these four sites in the CSS as being capable of delivery for residential development within the Plan period, with 671 units delivered between 2006 and 2015 and a further 506 units between 2015 and 2021.

The UCS also states in the same section that:

"There are considerable areas of land in the district that are currently allocated for, and in use as, employment land. The redevelopment of such sites for residential use would reduce demand for residential development on greenfield sites, but would at the same time create a need for alternative sites to be found for employment. Such an approach, which would be likely to require the decontamination of existing employment land to make it fit for residential use, together with development of a greenfield site and implementation of additional infrastructure to serve the new employment area, may well be unsustainable." [our emphasis]

The UCS appears to confirm therefore, that not only would the redevelopment of the four sites listed in the CSS be unlikely within the Plan period, but also potentially unsustainable. In this regard, it is notable that the promoters of Stambridge Mills sought the Screening Opinion of the Council as to whether Environmental Impact Assessment of the planning application for the redevelopment of the site for residential use was required in 2007, but to date are yet to submit a planning application for the redevelopment of the site.

In light of this, Colonnade does not consider the CSS is 'the most appropriate strategy when considered against the reasonable alternatives' [test of soundness in the table following Paragraph 4.52 of PPS12], which include the provision of residential development in East Rochford.

iv. Strategic Housing Growth to the East of Rochford

Furthermore, whilst paragraph 2.62 of the CSS identifies concern relating to the identification of locations to the east of Rochford for development on the basis that 'vehicular movements would inevitably be directed through Rochford's historic core', the CSS later identifies Stambridge Mills as a suitable site for residential redevelopment.

In light of the evident conflicts between the evidence base provided in support of the CSS and the absence of other evidence, the CSS is not considered 'sound' in the context of the tests of soundness in the table following Paragraph 4.52 of PPS12.

v. Housing Trajectory

Paragraph 4.28 of the CSS confirms that policies H1, H2 and H3 of the CSS will deliver housing supply as illustrated in the Housing Trajectory at Appendix H2. This Housing Trajectory is transposed from the 2008 Annual Monitoring Report (AMR).

Whilst on the face of it, the Housing Trajectory appears to confirm that the Council can meet its requirement to identify a five year housing supply, many of the sites identified within the AMR do not conform to the guidance issued by CLG in August 2008, on the assessment of a five year land supply. The guidance identifies sites that can be included within the five year assessment of housing supply as:

"those that are allocated for housing in the Development Plan, sites that have planning permission (outline or full planning permission that has not been implemented) and specific, unallocated brownfield sites that have the potential to make a significant contribution to housing delivery during the 5 year period".

Table 4.10: Projected Net Completions of the AMR confirms that the five year housing land supply figure includes sites from 'other land allocated for residential purposes', which are based on land allocations outside existing settlements. However, it should be clarified that these land allocations are not currently allocated for housing development in an adopted Development Plan. As such, these unallocated greenfield sites that are yet to make significant progress through the planning system should be discounted and the five year housing land supply recalculated.

The table below has been prepared to confirm the extent of the shortfall should the sites from 'other land allocated for residential purposes' be removed from the calculation of the Rochford five year housing land supply, in accordance with the guidance issued by CLG:

Recalculated Five Year Housing Land Supply (2009 - 2014):

Year
1st April 2009 to 31st March 2010
Predicted Delivery (A)

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106 dwellings
Allocations on 'other land allocated for residential purposes' (B)
0
Residual delivery (A-B)
106 dwellings
Delivery Shortfall
0

Year
1st April 2010 to 31st March 2011
Predicted Delivery (A)
217 dwellings
Allocations on 'other land allocated for residential purposes' (B)
150
Residual delivery (A-B)
67 dwellings
Delivery Shortfall
150

Year
1st April 2011 to 31st March 2012
Predicted Delivery (A)
544 dwellings
Allocations on 'other land allocated for residential purposes' (B)
300
Residual delivery (A-B)
244 dwellings
Delivery Shortfall
300

Year
1st April 2012 to 31st March 2013
Predicted Delivery (A)
395 dwellings
Allocations on 'other land allocated for residential purposes' (B)
375
Residual delivery (A-B)
20 dwellings
Delivery Shortfall
375

Year
1st April 2013 to 31st March 2014
Predicted Delivery (A)
300 dwellings
Allocations on 'other land allocated for residential purposes' (B)
300
Residual delivery (A-B)
0 dwellings
Delivery Shortfall
300

TOTAL

Predicted Delivery (A)
1,562 dwellings

Allocations on 'other land allocated for residential purposes' (B)
1,125 dwellings

Residual delivery (A-B)
437 dwellings

Delivery Shortfall
1,125 dwellings

The above table confirms that the removal of the 'other land allocated for residential purposes' from the calculation of the Rochford five year housing land supply leaves the Council with a minimum net additional housing delivery of 437 dwellings, which equates to a supply of 1.7 years based on the adjusted annual delivery target of a minimum of 255 net

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CHAPTER 11 Existing Employment Land, 11.32

additional dwellings per annum. As such, the Council is failing to meet its requirement to demonstrate a five year housing land supply in accordance with PPS3 and the supporting guidance provided by CLG. It is notable that the recent application by David Wilson Homes at Land between Main Road and Rectory Road and Clements Hall Way, Hawkwell identifies an even greater shortfall in the Council's five year housing land supply.

In addition to the above, the AMR does not include a commentary on how deliverability has been assessed against the requirements of paragraph 54 of PPS3.

Furthermore, the guidance from CLG confirms that the windfall sites cannot be relied upon in demonstrating a five year supply unless a Local Planning Authority can demonstrate genuine local circumstances exist to allow this exception. However, the second paragraph of the section entitled 'Housing Trajectory and Five Year Housing Supply' confirms that the estimated completions in the years 2008 to 2013 includes estimated yields through 'intensification' coming forward in future years. With reference to the definition of 'intensification' on page 13 of the AMR, it appears that the 'Housing Trajectory and Five Year Housing Supply' also includes provision for windfall sites. As such, the Council is required to demonstrate the 'genuine local circumstances exist to allow this exception'.

The pressures on delivery and need for additional sites are more acute when it is considered that an average delivery rate of 204 dwellings per annum was achieved during a strong period of housing market growth. In view of the current economic downturn, and significant problems faced within the housing market, the Council should seek to identify appropriate and deliverable sites to meet its regional housing target provision commitments. Suitable sites would include Coombes Farm, which has been positively promoted for development through the LDF process.

It may, therefore, be more appropriate for the Council not merely to allocate sufficient sites to meet the minimum targets set down by the East of England Plan, but to identify a reservoir of land capable of coming forward for development should the sites identified through the CSS and Allocations Development Plan Documents (DPD) fail to come forward for development within the anticipated timescales.

vi. Appendix H1

As set out in the representations to the Preferred Options Core Strategy, there is continuing concern that the list of improvements to infrastructure required in support of residential development as set out in Appendix H1 fails to provide the necessary justification for its inclusion. Whilst the preamble seeks to clarify why the infrastructure is sought, the inclusion of this list should be fully justified, otherwise it is of little value. Furthermore, it would be of benefit to provide further details of the existing community infrastructure provision and capacity within the evidence base.

The failure to provide the necessary justification for its inclusion means that the CSS will not be 'founded on a robust and credible evidence base' [test of soundness in the table following Paragraph 4.52 of PPS12].

d) Character of Place

As set out in the representations to the Preferred Options Core Strategy, Colonnade considers that, with respect to the requirement to produce and adhere to Development Briefs for large residential developments, as set out in Policy CP1, the Council should not seek to impose further demands on developers where existing regulations provide sufficient requirements regarding design. In this instance, Design and Access Statements provide sufficient design guidelines for developments and there is no additional information provided in the policy or supporting text that clearly sets out the justification for this requirement.

e) Green Belt

With reference to the comments regarding the redevelopment of employment sites under the 'Housing' section above and the requirement to allocate sufficient land to meet the minimum housing provision targets as required by the East of England Plan, Colonnade considers that the chapter on Green Belt, and policy GB1 in particular, fails to provide the necessary evidence base that will allow it to be monitored effectively.

It is inherent that the proposed redevelopment of previously developed employment sites for residential use in order to reduce the requirement to allocate previously undeveloped land for residential use will displace these employment uses. In turn, therefore, the separate allocation of previously undeveloped Green Belt to accommodate the compensatory employment provision is required. This is accepted in principle at paragraph 11.11 of the CSS.

Without providing clarification of the anticipated quantum of land required to accommodate the provision of housing and compensatory and new employment land, it is not possible to monitor the performance of policy GB1.

However, using the Council's figures in the table setting out the breakdown of the housing provision figures in Chapter 4 of the CSS (assuming that actual completions and extant permissions are all on previously developed land), setting aside the displacement of employment uses referred to above, approximately 42% of the required minimum housing provision target is capable of being accommodated on previously developed land (2,005 units from a total of 4,750). As such, the Council is required to provide at least 58% of the required minimum housing provision target on the Green Belt (2,745 units from a total of 4,750).

16259 Object

CHAPTER 11 Existing Employment Land, 11.32

If these figures are adjusted to take account of the displacement of employment uses (assuming the provision of an equal quantity of land is required to compensate for the employment land that is redeveloped), this figure changes to 17.5% on previously developed land and 82.5% on Green Belt (828 and 3,922 units from a total of 4,750 respectively). Even allowing for the achievement of higher densities of employment on new developments, the figures above are unlikely to change significantly.

Furthermore, the table in Chapter 4 also confirms that no previously developed land will be available for development beyond 2021, or 2015 if account is taken of the displacement of the employment uses.

In light of this, not only does Chapter 6 fail to provide the necessary evidence base that will allow it to be monitored effectively, it is also necessary to consider whether it presents the most appropriate strategy for addressing the required release of Green Belt land to accommodate the defined housing and employment delivery targets to 2025 and beyond as necessary. Colonnade considers a more robust approach that is flexible and capable of being monitored, would be to clearly identify those sites capable of delivery in the short term, which for the avoidance of doubt includes those sites being promoted by Colonnade, with a reservoir of alternative sites set aside for future growth.

As set out in the representations to the Preferred Options Core Strategy, Colonnade considers that the inclusion of an affordable housing exception policy within the CSS will aid the delivery of community housing within rural areas. However, the CSS does not contain such a policy, or adequately address the issue of community housing within rural areas and the CSS is not considered to provide sufficient flexibility to allow for the delivery of essential rural housing.

f) Environmental Issues

Colonnade has concerns regarding the justification for and effectiveness of a number of the policies contained within the Environmental Issues chapter, as follows:

â€¢ Policy ENV1: The Council fails to identify how it will "maintain, restore and enhance" the sites of nature conservation importance that are identified, or how the performance of this policy will be monitored;

â€¢ Policy ENV3: In the context of the advice at paragraph 4.32 of PPS12 regarding the reformulation of national policies, Colonnade does not consider that this policy is required; and

â€¢ Policy ENV9: As set out in the representations to the Preferred Options Core Strategy, Colonnade does not consider that the necessary evidence base has been provided to justify a policy that seeks to go above and beyond the policy targets for the Code for Sustainable Homes as set out by Central Government.

g) Community Infrastructure, Leisure and Tourism

Policy CLT1 refers to the requirement for residential and employment development to contribute to the infrastructure identified in Appendix CLT1 through Standard Charges.

However, whilst the general principle of securing planning obligations through the application of standard charges is broadly accepted, the list of infrastructure requirements set out in Appendix CLT1 is not supported by sufficient evidence base to identify its robustness and credibility. As such, Colonnade does not consider either policy CLT1 or Appendix CLT1 is justified in the context of PPS12.

It is also noted that, despite the clarification sought by Colonnade at the Core Strategy Preferred Options stage, the CSS fails to confirm what information should be contained within Health Impact Assessments, which are required by policy CLT4. Once again, Colonnade requests further clarification of what is involved in the assessment and the expected outputs, which will provide greater clarity and will allow the policy to be monitored.

h) Transport

Policy T8 confirms that the Council will apply minimum parking standards. As set out in the representations to the Preferred Options Core Strategy, the guidance in Planning Policy Guidance Note 13: Transport (PPG13) is clear regarding the imposition of parking standards.

Paragraphs 52-56 of PPG13 confirm that the Local Planning Authorities should apply maximum not minimum parking standards. In order to satisfy the legal requirements set out in PPS12, the policy must reflect PPG13 to promote sustainable transport choices and further provide incentives for developers to locate further residential land closer to local service centres by requiring maximum parking standards for residential developments.

i) Economic Development

As set out in the representations to the Preferred Options Core Strategy, the land at Three Ashes Farm provides an excellent opportunity to deliver employment growth in the short term and may be a suitable site for the 'Eco-Innovation Centre' that is being promoted by the Council. Its identification as a suitable location for strategic employment growth, or the provision of an Eco-Innovation Centre, would accord with the general principles of the policies contained within Chapter 11.

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O - 16259 - 9177 - Existing Employment Land, 11.32 - i

16259 Object

CHAPTER 11 Existing Employment Land, 11.32

The identification of Purdeys Industrial Estate as fit for purpose (in paragraph 11.32 and the Council's 2008 Employment Land Study 2008) and therefore it should be maintained and if possible expanded, is welcomed and Colonnade considers that Three Ashes Farm could deliver this expansion, providing a natural extension to Purdeys Industrial Estate and being strategically located close to the Airport.

Three Ashes would address the negative impacts that the nearby residential area experiences from the existing Industrial Estate by providing a buffer between established uses and the residential area with less intensive employment activities. The highways analysis that has been carried out has suggested that it would not have an adverse impact on roads and congestion. Furthermore, there are very few opportunities for businesses to expand and Three Ashes could provide this opportunity.

j) Conclusions

Following the submission of representations to the Preferred Options Core Strategy, Colonnade is disappointed to note that the CSS fails to take account of the majority of the issues raised in their representations.

In addition, Colonnade considers the plan to be 'unsound' as the document consistently fails to meet the tests of soundness set out in the table following Paragraph 4.52 of PPS12 and respectfully requests that the Council notifies Icen, on behalf of Colonnade, of the future arrangements for the Examination of the Core Strategy. Furthermore, Colonnade wishes to take this opportunity to formally register a request to appear at all stages of the Examination in Public, including the pre-hearing meeting and any planned hearing sessions whereby issues raised in the context of this letter are to be discussed. Please confirm this request, and that the representations made to the Preferred Options Core Strategy will be taken into account alongside the current representations, by way of return to this letter.

Icen Projects, on behalf of Colonnade Land LLP trusts that the Council will find these representations to be constructive and helpful in taking forward the Core Strategy. Should you wish to discuss any aspect of these representations further, please do not hesitate to contact us.

Summary:

As set out in the representations to the Preferred Options Core Strategy, the land at Three Ashes Farm provides an excellent opportunity to deliver employment growth in the short term and may be a suitable site for the 'Eco-Innovation Centre' that is being promoted by the Council. Its identification as a suitable location for strategic employment growth, or the provision of an Eco-Innovation Centre, would accord with the general principles of the policies contained within Chapter 11.

The identification of Purdeys Industrial Estate as fit for purpose (in paragraph 11.32 and the Council's 2008 Employment Land Study 2008) and therefore it should be maintained and if possible expanded, is welcomed and Colonnade considers that Three Ashes Farm could deliver this expansion, providing a natural extension to Purdeys Industrial Estate and being strategically located close to the Airport.

Three Ashes would address the negative impacts that the nearby residential area experiences from the existing Industrial Estate by providing a buffer between established uses and the residential area with less intensive employment activities. The highways analysis that has been carried out has suggested that it would not have an adverse impact on roads and congestion. Furthermore, there are very few opportunities for businesses to expand and Three Ashes could provide this opportunity.

Change to Plan

Appear at exam? Yes

Soundness Tests i

Core Strategy Submission Document

O - 16289 - 12098 - Existing Employment Land, 11.32 - i

16289 Object

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Respondent: Mr David Dare [12098]

1, Woodstock Crescent
Hockley Essex
SS5 4XG
UK
01702 205813

Agent: N/A

Full Text: Highway & Traffic Implications

1. Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;

* (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

* EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

3. RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local

16289 Object

CHAPTER 11 Existing Employment Land, 11.32

Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

Summary:

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:

* The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

* The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

Previous consultations ignored by RDC:

The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

16289 Object

CHAPTER 11 Existing Employment Land, 11.32

Thus the proposals are not founded on a robust and credible evidence base and are unsound

7. RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

* The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

* the Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!

* The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Summary:

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

the Foundry Industrial Estate has never even been previously mentioned;

The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

9. PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

10. THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food

Core Strategy Submission Document

16289 Object

CHAPTER 11 Existing Employment Land, 11.32

shopping expenditure.

2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's

existing strengths, rather than retail expansion"

4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moveover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Summary:

Previous consultations ignored by RDC:

The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

16308 Object

CHAPTER 11 Existing Employment Land, 11.32

Respondent: Mr D Himsley [14206]

4 Brackendale Close
Hockley
Essex
SS5 5AP

Agent: N/A

Full Text: Please find the following objections: -

10 off Unsound Reasons.
1. Highway and Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

3. RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:

The Hockley Parish Plan (dated 2007). The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

7. RDC not consulted on proposals to relocate the Eldon Way and Foundry Industrial Estates

EW; CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" absolutely no consultation on concept of moving EW businesses entirely

FIE; has never even been previously mentioned in any plan version; CS states omission was due to typing error!

Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus proposals are not founded on a robust and credible evidence base and are unsound.

8. The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

Core Strategy Submission Document

16308 Object

CHAPTER 11 Existing Employment Land, 11.32

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound

9. PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies"

Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which

does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise

residents how such changes will be made and the strategy is unsound.

10. The CS misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The CS states "The R&LS states Hockley has great potential and has a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) "does not lend itself to a food store capable of retaining a significant proportion of main food shopping expenditure.
- 2) "there is no immediate capacity for additional floor space."
- 3) "recommend that focus be maintained on developing Hockley's existing strengths."
- 4) " the Council may wish to consider reclassifying Hockley from a town center, to a district center".

Summary:

6. Previous consultations ignored by RDC:

The Hockley Parish Plan (dated 2007). The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16445 - 14218 - Existing Employment Land, 11.32 - i

16445 Object

CHAPTER 11 Existing Employment Land, 11.32

Respondent: Barbara Havey [14218]

71 Main Road
Hockley
Essex
SS5 4RG

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.
â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is

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also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

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SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

Previous consultations ignored by RDC:

â€¢ The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

â€¢ The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

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The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

â€¢ The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

â€¢ the Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!

â€¢ The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Summary:

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RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates
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Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.
 - 2) (10.28) "There is no immediate capacity for additional floor space."
 - 3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion"
 - 4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".
- The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Summary:

Summary:

Previous consultations ignored by RDC:

The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry

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Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16490 - 9646 - Existing Employment Land, 11.32 - i

16490 Object

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Respondent: Mrs Margaret Christian [9646]

41 Westminster Drive
Hockley
Essex
SS5 4XD
01702 204320

Agent: N/A

Full Text: Please find enclosed my objection to the Core Strategy Submission DPD. Please kindly acknowledge receipt of this objection and duly register it.

Objections to RDC's Core Strategy Submission DPD

Reason Unsound

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus service are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

3. RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

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The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

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It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs not, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. Thus it is unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of address the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:

The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

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The Foundry Industrial Estates has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy acknowledges this omission was due to a typing error!

The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing HAAP consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy or Hockley Area Action Plan (HAAP) defines its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

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PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

10. The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

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The Core Strategy is inaccurate, misleading and unsound.

Summary:

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Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16532 - 13921 - Existing Employment Land, 11.32 - i

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CHAPTER 11 Existing Employment Land, 11.32

Respondent: Ms H Rozga [13921]

56A Aldermans Hill
Hockley
Essex
SS5 4RW

Agent: N/A

Full Text:

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus service are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

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It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

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Summary:

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The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.

2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion".

4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6.

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16532 Object

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Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) "the Council may wish to consider reclassifying Hockley from a town centre to a district centre.

Summary: Previous consultations ignored by RDC:

The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

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16550 Object

CHAPTER 11 Existing Employment Land, 11.32

Respondent: G and S Cooke [13667]

56 Aldermans Hill
Hockley
Essex
SS5 4RW

Agent: N/A

Full Text:

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus service are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

Summary:

Proposals for moving employment to of town locations, at either end of the district, with no existing public transport inks, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

3. RCD are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in

16550 Object

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the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts.

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs not, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. Thus it is unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of address the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

Summary:

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:

The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

Previous consultations ignored by RDC:

The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

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7. RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates.

The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely.

The Foundry Industrial Estates has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy acknowledges this omission was due to a typing error!

The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Summary:

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The Foundry Industrial Estate has never even been previously mentioned.

The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate.

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing HAAP consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy or Hockley Area Action Plan (HAAP) defines its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

9. PPS12, 4.6, states that Cores Strategies show be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which do not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

10. The Core Strategy misrepresent the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.

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2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion".

4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) "the Council may wish to consider reclassifying Hockley from a town centre to a district centre.

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The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

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Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

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O - 16583 - 14231 - Existing Employment Land, 11.32 - i

16583 Object

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Respondent: Heather Wakefield [14231]

Not provided

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighboring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.
â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

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The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

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Summary:

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The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

• The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

• the Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!

• The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

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Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

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Whereas, the R&LS actually states:

- 1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.
 - 2) (10.28) "There is no immediate capacity for additional floor space."
 - 3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion"
 - 4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".
- The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Summary:

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The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

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Change to Plan

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

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16583 Object

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Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16600 - 14232 - Existing Employment Land, 11.32 - i

16600 Object

CHAPTER 11 Existing Employment Land, 11.32

Respondent: Roger Wakefield [14232]

Not provided

SS5 4UX

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighboring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

16600 Object

CHAPTER 11 Existing Employment Land, 11.32

Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modeling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

Summary:

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

Previous consultations ignored by RDC:

• The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

• The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

Previous consultations ignored by RDC:

The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

• The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

• the Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!

• The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Summary:

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

• The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

Core Strategy Submission Document

16600 Object

CHAPTER 11 Existing Employment Land, 11.32

â€¢ the Foundry Industrial Estate has never even been previously mentioned;
â€¢ The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.
 - 2) (10.28) "There is no immediate capacity for additional floor space."
 - 3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion"
 - 4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".
- The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Summary:

Summary:

Previous consultations ignored by RDC:

The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

Change to Plan

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

Core Strategy Submission Document

O - 16600 - 14232 - Existing Employment Land, 11.32 - i

16600 Object

CHAPTER 11 Existing Employment Land, 11.32

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16720 - 7834 - Existing Employment Land, 11.32 - i

16720 Object

CHAPTER 11 Existing Employment Land, 11.32

Respondent: Ms G Yeadell [7834]

6 Southend Road
Hockley
Essex
SS5 4QQ
01702 205450

Agent: N/A

Full Text: Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1

Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2 you discarded N.E.Hockley as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley..along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

Response to C.S Preferred Options 2008 and HAAP 2009

June 2009 issue C S Submission issue says Eldon Way will be used for housing, whereas Sept.2009 issue says "alternative uses, including residential.." to be decided by HAAP (Issues consultation done, Pref.Options issue awaited, but judging from JAAP Pref.Options decision - namely biggest option chosen against overriding opposition, it will be housing).

Need to be logical and even-handed in proposals

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

Establish likely level of Standard Charges. Accept you cannot turn district into motorways with wholesale demolition.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

Para.10.5 "..highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which cannot be altered without much destruction.

Reply to CS Pref. Options 2008 & HAAP Issues/Options 2009

Policy T3, CLT1 Appendix CLT1 Public transport RDC admits this is in the private sector. In Hockley, operator has cut No7 service to 1 per hour from Ashingdon Schools, claiming it is unviable beyond. This is unlikely to change as Hockley is car dependant. No8 bus through Hawkwell is cut to 1 per hour to Rayleigh, for same reason as No7. Proposed planning agreements with developers can't run: eg, a community centre or classroom given by a developer remains once he has moved on - how can that apply for an on-going bus service?

Reply to Infrastructure Transport in CS Pref. Opts. 2008 and to HAAP Issues Opts. 2009.

Ch.11 Economic development

Policy ED3 Core Strategy preferred Options 2008 hinted at possible housing in Eldon Way site. June 2009 Submission version, without consultation, said Eldon Way would be housing (map included Foundry, not the text). September 2009 Submission said redevelopment would be in HAAP (which apart from the Issues/Options version, is unfinished. Judging from results of JAAP Preferred Options where biggest option is chosen, though most respondents were against it, site will be housing, without consultation.

Core Strategy Submission Document

O - 16720 - 7834 - Existing Employment Land, 11.32 - i

16720 Object

CHAPTER 11 Existing Employment Land, 11.32

Para.1.25, Para.11.32 Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to accommodated employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

Reply to HAAP Issues Options 2009

Remove compulsory relocation

Policy ED4 Policy states Council will allocate 18ha of land to make up for de-allocations in ED3 - that proves point above.

Proposals for moving employment to out of town locations with no existing transport links are contrary to government policies PPG4, PPS1 and PPS4 and Core Strategy Policy T1.

Evidence Base is ignored by contravening Hockley Parish Plan 2007 and ignoring residents' views on HAAP Issues/Options. Next stage of HAAP Preferred Options is pre-empted and rendered irrelevant. Core Strategy plans to relocate Eldon Way Foundry estate to Greenfield site with no nearby bus or railway. RDC plans to upgrade the nearest road to dual carriageway, though the connecting B1013 (through Hockley) will stay single, said by ECC Highways statistics to be 72% capacity. Airport bosses and council cannot suggest there will be no traffic growth from JAAP and new industrial site.

Reply to Hockley Parish Plan 2007. HAAP Issues 2009

Move to new industrial site near airport contravenes PPS4:

- EC7.3C "out of centre sites, with preference given to sites...well served by choice of...transport and...close to centre and...high likelihood of forming links with centre". There is no current public transport and links with centres is unlikely".

- EC 7.5.1 "whether the site is or will be accessible and well served by choice of transport, public transport, walking and cycling, as well as by car...". Remote location, narrow busy B1013 makes the site unsuitable for access by cycle or on foot.

It also contravenes PPS1 (27vii)... "reduce need to travel, encourage accessible public transport provision to secure more sustainable patterns of transport...Planning should actively manage patterns of urban growth to make fullest use of public transport and focus development in existing centres, near to major public transport interchanges". Core Strategy undermines its own policy Transport and Highways policy T1 and is unsound.

Although shown on accompanying drawing in earlier versions, there was no prior textual mention of Foundry industrial estate (next to Eldon Way) for redevelopment until current CS 2009 Submission. This was stated to be a typing error, but does not inspire confidence in reliability of drafting.

Revise both 2009 Core Strategy and 2009 HAAP Issues/options

Chapter 12: Retail/Town centres

The Core Strategy misrepresents findings of the Retail and Leisure Study 2008.

Para.12.38 The Core Strategy states (para.12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace."

Whereas the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure".

2) (10.28) "There is no immediate capacity for additional floorspace".

3) (10.29) "we recommend focus be maintained on developing Hockley's existing strengths, rather than retail expansion"

4) 10.31 "the current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it has a very small catchment population. Accordingly, the council may wish to consider reclassifying Hockley from a town centre to a district centre".

Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

The Council will work with landowners and its partners to deliver the HAAP.

Remove threat of compulsory purchase orders.

Core Strategy Submission Document

O - 16720 - 7834 - Existing Employment Land, 11.32 - i

16720 Object

CHAPTER 11 Existing Employment Land, 11.32

One doesn't perceive impartiality when the Planning Director replies to local HAAP survey with "The affluent people of Hockley are entitled to famous name shops".

Chapter 5: Character of Place and Local Lists

Para.5.4 "Rochford district has unique character..stems from traditional buildings..still dominate towns and villages".

Para.5.17 "Council believes many buildings..are of local distinctiveness..part of..cherished local scene".

This only applies to favoured places: Rochford, Rayleigh, greenbelt villages. Many Hockley conservable items have been systemically removed for supposedly lucrative development in face of widespread protect. This is for supposed need for housing. In fact heritage items have been replaced by dwellings most cannot afford, and/or are hard to sell due to unsuitability of massing and siting. Many other homes are jeopardised by this practice.

HAAP issues 2009. Core Strategy 2006, 2007,2008, SCI.2006

Fewer 'vested interests', more even handedness. No more pressing people out of businesses, homes for expediency.

A CPRE Fieldwork issue extolled Local Lists, citing refusal of 16 flats to replace character house, not on local list. Inspector said house, façade made a contribution to area character, even if English heritage decided it didn't warrant listing. Council worked to get the house grade listed and even made adjacent area conservation one.

Hockley had one such on a "significant site" faced with 13 flats. Ward Member omitted house from refusal proposal, so house could be demolished. RDC dropped Local List ahead of appeal: "Government frowned on such Lists" (Other LAs, unaware of supposed directive retained theirs. After demolition RDC restored Local Lists, saying Government now support them. When Inspector queried the complaint, the then policy officer said "just politics, lot of local interest, nothing of character in the area[!]. (A dozen such items had been removed). Some "distinctive" Hockley buildings are still condemned (in Greensward Lane.; others threatened (Spa Road). Whereas a modest hue and cry in Rayleigh will usually result in a building being saved.

Conclusion

Core Strategy Submission DPD is basically unsound in many respects

Incomplete information. Amongst others, it refers to Hockley AAP, the first stage of which is complete, but not other three. Rochford AAP first stage has been published in arrears of Core Strategy Submission. Rayleigh AAP is still awaited. Precise housing sites are absent, as Urban Capacity Study 2007 has been superseded by Strategic Housing Land Availability Assessment, not yet published. Traders, residents, are thus responding to Core Strategy Submission with incomplete information.

Lack of community involvement. Chapter 1, Introduction, para. 1.11 "Community involvement is an essential part of the plan making process".

In Statement of Community Involvement 2006 Rochford RDC "recognises need to enable people to have their voices heard".

Re Public Meetings: "Consideration will be had to timing and venue to ensure meeting is as accessible as possible".

Take Hockley Area Action Plan as an example of the opposite of all this:- Presentation of document was at Hullbridge, 7.30pm. It was also discussed with JAAP at Rochford Freight House (for traders only) at 7am, without publicity. Excuse made: HAAP on RDC website, which none will seek unless knowing it is there. Rochford District Matters newsheet had minute articles on p.3, half way through consultation period. Another excuse: a 2nd presentation by Hockley Residents Association with planning officer present: only because of complaints, and it is not the HRA's responsibility to RDC's job. Due to unavoidable haste of calling meeting, few knew and only 50 were present.

In Core Strategy Submission Hockley Parish Plan has been ignored. Proposals also ignore 95% rejection rate response to HAAP 2009, which included proposals for Eldon Way employment site.

Unfettered right of developers to carry on as if Core Strategy didn't exist. In PPS 12, Ch.4.6 states: "Core Strategies should be flexible and able to show how they handle contingencies". Several large planning applications have been submitted proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS 12.

Where are we? Finally, at Chapter 1, Introduction, para. 1.24: "the Core Strategy will have to be reviewed in the event of a new Local Area Agreement, post-2011, setting different priorities". So what purpose does all this work serve? So we have hardly finished this exercise, before it all starts again?

Summary:

Para.1.25, Para.11.32 Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to

Core Strategy Submission Document

O - 16720 - 7834 - Existing Employment Land, 11.32 - i

16720 Object

CHAPTER 11 Existing Employment Land, 11.32

accommodated employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

Change to Plan Remove compulsory relocation

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16754 - 14229 - Existing Employment Land, 11.32 - i, iii

16754 Object

CHAPTER 11 Existing Employment Land, 11.32

Respondent: Hockley Under Threat (J Abbey) [14229]

Hockley Under Threat
None provided

Agent: N/A

Full Text:

Ch. 4 Housing; Ch.10 Transport, Highways; Ch.11 Economic Development; Ch.12 Retail/town centres; Ch.5 Character of place & Local Lists

Chapter 4: Housing

Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1, Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2

N.E.Hockley was discarded as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley...along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

Need to be logical and even-handed in proposals

June 2009 issue C S Submission issue says Eldon Way will be used for housing, whereas Sept.2009 issue says "alternative uses, including residential.." to be decided by HAAP (Issues consultation done, Pref.Options issue awaited, but judging from JAAP Pref.Options decision - namely biggest option chosen against overriding opposition, it will be housing).

Policy H1, T1 Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG14 & PPS1. it also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths",

The Core Strategy also contravenes its own policy T1 and is unsound.

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

Establish like motorways with wholesale demolition.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts.

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Para.10.5

Policy T3, CLT1 Appendix CLT1

T1 & T2 "...highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which

Core Strategy Submission Document

O - 16754 - 14229 - Existing Employment Land, 11.32 - i, iii

16754 Object

CHAPTER 11 Existing Employment Land, 11.32

cannot be altered without much destruction.

Public transport RDC admits this is in the private sector. In Hockley, operator has cut No 7 service to one per hour from Ashingdon Schools, claiming it is unviable beyond. This is unlikely to change as Hockley is car dependant. No 8 bus through Hawkwell is cut to one per hour to Rayleigh, for same reason as No 7. Proposed planning agreements with developers can't run: e.g., a community centre or classroom given by a developer remains once he has moved on - how can that apply for an on-going bus service?

Ch.11 Economic development

Policy ED3 Core Strategy preferred Options 2008 hinted at possible housing in Eldon Way site. June 2009 Submission version, without consultation, said Eldon Way would be housing (map included Foundry, not the text). September 2009 Submission said redevelopment would be in HAAP (which apart from the Issues/Options version, is unfinished. Judging from results of JAAP Preferred Options where biggest option is chosen, though most respondents were against it, site will be housing, without consultation.

Para.1.25 Para.11.32

Policy ED4 T1 & T2 Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to accommodated employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

Remove compulsory relocation

Policy states Council will allocate 18ha of land to make up for de-allocations in ED3 - that proves point above.

Proposals for moving employment to out of town locations with no existing transport links are contrary to government policies PPG4, PPS1 and PPS4 and Core Strategy Policy T1.

Evidence Base is ignored by contravening Hockley Parish Plan 2007 and ignoring residents' views on HAAP Issues/Options. Next stage of HAAP Preferred Options is pre-empted and rendered irrelevant.

Core Strategy plans to relocate Eldon Way Foundry estate to Greenfield site with no nearby bus or railway. RDC plans to upgrade the nearest road to dual carriageway, though the connecting B1013 (through Hockley) will stay single, said by ECC Highways statistics to be 72% capacity. Airport bosses and council cannot suggest there will be no traffic growth from JAAP and new industrial site.

Revise both 2009 Core Strategy and 2009 HAAP Issues/options

Move to new industrial site near airport contravenes PPS4:

EC7.3C "out of centre sites, with preference given to sites..well served by choice of..transport and..close to centre and..high likelihood of forming links with centre". There is no current public transport and links with centres is unlikely".

EC 7.5.1 "whether the site is or will be accessible and well served by choice of transport, public transport, walking and cycling, as well as by car..". Remote location, narrow busy B1013 makes the site unsuitable for access by cycle or on foot.

It also contravenes PPS1 (27vii).. "reduce need to travel, encourage accessible public transport provision to secure more sustainable patterns of transport..Planning should actively manage patterns of urban growth to make fullest use of public transport and focus development in existing centres, near to major public transport interchanges". Core Strategy undermines its own policy Transport and Highways policy T1 and is unsound.

H1 & RTC6 Although shown on accompanying drawing in earlier versions, there was no prior textual mention of Foundry industrial estate (next to Eldon Way) for redevelopment until current CS 2009 Submission. In recent amendment to the CS this was stated to be due to a typing error!

Chapter 12: Retail/Town centres

The Core Strategy misrepresents findings of the Retail and Leisure Study 2008.

Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

Para.12.38 H1 & RTC6 The Core Strategy states (para.12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace."

Whereas the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food

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O - 16754 - 14229 - Existing Employment Land, 11.32 - i, iii

16754 Object

CHAPTER 11 Existing Employment Land, 11.32

shopping expenditure".

2) (10.28) "There is no immediate capacity for additional floorspace".

3) (10.29) "we recommend focus be maintained on developing Hockley's existing strengths, rather than retail expansion"

4) 10.31 "the current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it has a very small catchment population. Accordingly, the council may wish to consider reclassifying Hockley from a town centre to a district centre".

Remove threat of compulsory purchase orders.

The Council will work with landowners and its partners to deliver the HAAP.

Chapter 5: Character of Place and Local Lists

Para.5.4 "Rochford district has unique character..stems from traditional buildings..still dominate towns and villages".

Para.5.17 "Council believes many buildings..are of local distinctiveness..part of..cherished local scene".

This only appears to apply to certain places: Rochford, Rayleigh, greenbelt villages. Many Hockley conservable items have been systemically removed for supposedly lucrative development in face of widespread protect. This is for supposed need for housing. In fact heritage items have been replaced by dwellings most cannot afford, and/or are hard to sell due to unsuitability of massing and siting. Many other homes are jeopardised by this practice.

Conclusion

Core Strategy Submission DPD is basically unsound in many respects:

Incomplete information. Amongst others, it refers to Hockley AAP, the first stage of which is complete, but not other three. Rochford AAP first stage has been published in arrears of Core Strategy Submission. Rayleigh AAP is still awaited. Precise housing sites are absent, as Urban Capacity Study 2007 has been superseded by Strategic Housing Land Availability Assessment, not yet published. Traders, residents, are thus responding to Core Strategy Submission with incomplete information.

Lack of community involvement. Chapter 1, Introduction, para. 1.11 "Community involvement is an essential part of the plan making process". In Statement of Community Involvement 2006 Rochford RDC "recognises need to enable people..to have their voices heard".

Re Public Meetings: "Consideration will be had to timing and venue to ensure meeting is as accessible as possible".

Hockley Area Action Plan as an example of the opposite of all this:- Presentation of document was at Hullbridge, 7.30 p.m. It was also discussed with JAAP at Rochford Freight House (for traders only) at 7 a.m., without publicity. Excuse made: HAAP on RDC website, which none will seek unless knowing it is there. Rochford District Matters newssheet had minute articles on p.3, half way through consultation period. Another excuse: a second presentation by Hockley Residents Association with planning officer present: only because of complaints, and it is not the HRA's responsibility to RDC's job. Due to unavoidable haste of calling meeting, few knew and only 50 were present.

In Core Strategy Submission Hockley Parish Plan has been ignored. Proposals also ignore 95% rejection rate response to HAAP 2009, which included proposals for Eldon Way employment site.

Unfettered right of developers to carry on as if Core Strategy didn't exist. In PPS 12, Ch.4.6 states: "Core Strategies should be flexible and able to show how they handle contingencies". Several large planning applications have been submitted proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS 12.

Where are we? Finally, at Chapter 1, Introduction, para. 1.24: "the Core Strategy will have to be reviewed in the event of a new Local Area Agreement, post-2011, setting different priorities". So what purpose does all this work serve? So we have hardly finished this exercise, before it all starts again?

Summary:

Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to accommodated employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

Change to Plan

Remove compulsory relocation

Appear at exam?

Not Specified

Soundness Tests

i, iii

Core Strategy Submission Document

O - 15864 - 12083 - Policy ED3 - Existing Employment Land - i, ii

15864 Object

CHAPTER 11 Policy ED3 - Existing Employment Land

Respondent: Mr Paul Sealey [12083]

Agent: N/A

Kirrin,
Hockley Rise,
Hockley
SS5 4PT
United Kingdom
01702206888

Full Text: As with policy H1 this appears to be a decision to redevelop the Eldon Way/Foundry areas in Hockley at the same time as the Hocklay Area Action plan appears to be consulting to see if this is an option. Including detail like this in a strategy will make it unresponsive to future change.

Summary: As with policy H1 this appears to be a decision to redevelop the Eldon Way/Foundry areas in Hockley at the same time as the Hocklay Area Action plan appears to be consulting to see if this is an option. Including detail like this in a strategy will make it unresponsive to future change.

Change to Plan Remove the specific detail from the policy and await the outcome of the consultation on the area action plan.

Appear at exam? No

Soundness Tests i, ii

Core Strategy Submission Document

S - 16065 - 14107 - Policy ED3 - Existing Employment Land - None

16065 Support

CHAPTER 11 Policy ED3 - Existing Employment Land

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: Our main concern is the re-development of industrial areas where this is out of town and means more travel for employees. We do not want to see industrial areas move away from towns because of the pressure of housing policy

Summary: Our main concern is the re-development of industrial areas where this is out of town and means more travel for employees. We do not want to see industrial areas move away from towns because of the pressure of housing policy

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16077 - 9599 - Policy ED3 - Existing Employment Land - i, ii

16077 Object

CHAPTER 11 Policy ED3 - Existing Employment Land

Respondent: Mrs Fiona Jury [9599]

WGDP Ltd
Cross Keys House
22 Queen Street
Salisbury
SP1 3EY

Agent: N/A

Full Text: The proposed re-allocation of the existing employment uses identified in the DPD is unsound. Having undertaken an assessment of their suitability and deliverability for residential or alternative uses, the sites at Hockley, Rawreth and Wakering are occupied by multiple users which would be difficult to relocate. Rawreth is characterised by a number of heavy industrial users which is likely to have caused significant contamination, which may prove unviable to remediate. Stambridge Mills whilst vacant, is highly unsustainable for a residential use, and is within Flood Risk Zone 3b, and therefore unlikely to pass the Exceptions Test.

Summary: The proposed re-allocation of the existing employment uses identified in the DPD is unsound. Having undertaken an assessment of their suitability and deliverability for residential or alternative uses, the sites at Hockley, Rawreth and Wakering are occupied by multiple users which would be difficult to relocate. Rawreth is characterised by a number of heavy industrial users which is likely to have caused significant contamination, which may prove unviable to remediate. Stambridge Mills whilst vacant, is highly unsustainable for a residential use, and is within Flood Risk Zone 3b, and therefore unlikely to pass the Exceptions Test.

Change to Plan The four employment sites which have been identified for re-allocation should be deleted from the DPD. They are not deliverable in the timeframe identified in the housing trajectory. Additional broad locations to accommodate future housing growth involving a Green Belt review should be identified in the Plan period.

Appear at exam? Yes

Soundness Tests i, ii

Core Strategy Submission Document

O - 16146 - 4951 - Policy ED3 - Existing Employment Land - i, ii, iii

16146 Object

CHAPTER 11 Policy ED3 - Existing Employment Land

Respondent: Hockley Residents Association (Mr B Guyett) [4951] **Agent:** N/A

Hockley Residents Association
2 Tonbridge Road
Hockley
Essex
SS5 5HL

Full Text: Previous consultations and public opinion ignored by RDC and HAAP pre-empted:
As well as ignoring the Parish Plan and the 95% rejection rate of the HAAP proposals, the Core Strategy proposals pre-empt the next round of the HAAP.

Public opinion in Hockley is strongly against both the HAAP and Core Strategy proposals for Hockley Village Centre. A survey undertaken in October 2009 had 972 responses (over 20% of households) and the key results were:
- shops: only 5% in favour of major redevelopment (43% supported moderate redevelopment and 52% only wanted minor improvements)
- Eldon Way & Foundry Industrial Estates: just 13% wanted major change with a youth centre suggested as the most popular improvement.
- Roads: nearly 2/3rds wanted to retain a roundabout at the Spa Junction instead of traffic lights proposed by RDC.

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary: Previous consultations ignored by RDC and HAAP pre-empted:
The proposals ignore both the Parish Plan and the 95% rejection rate of respondents to RDC's own HAAP Consultation (2009), which included specific proposals for Eldon Way (but did not even mention the Foundry Industrial Estate). A survey completed by 972 residents in October 2009 also confirmed the public's rejection with only 5% in favour of redeveloping the shops and only 13% supporting redevelopment of the industrial estate.
Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Change to Plan Delet from CS and includ in next round of HAAP

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16148 - 11793 - Policy ED3 - Existing Employment Land - i, ii, iii

16148 Object

CHAPTER 11 Policy ED3 - Existing Employment Land

Respondent: Mr Brian Guyett [11793]

2 Tonbridge Road,
Hockley
SS55HL
United Kingdom
07736211248

Agent: N/A

Full Text:

Previous consultations and public opinion ignored by RDC and HAAP pre-empted:
As well as ignoring the Parish Plan and the 95% rejection rate of the HAAP proposals, the Core Strategy proposals pre-empt the next round of the HAAP.

Public opinion in Hockley is strongly against both the HAAP and Core Strategy proposals for Hockley Village Centre. A survey undertaken in October 2009 had 972 responses (over 20% of households) and the key results were:

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Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Change to Plan

Deelete from CS and defer to next round of HAAP

Appear at exam? No

Soundness Tests i, ii, iii

Core Strategy Submission Document

S - 16187 - 12008 - Policy ED3 - Existing Employment Land - None

16187 Support

CHAPTER 11 Policy ED3 - Existing Employment Land

Respondent: EEDA (Mrs Juliet Richardson) [12008]

Agent: N/A

EEDA
The Business Centre
Station Road
Histon
Cambridge
CB4 9LQ
UK
01223 484632

Full Text: EEDA welcomes the Employment Land Study and supports the key recommendations of the report and therefore supports Policy ED3 - Existing Employment Land in relation to this.

Summary: EEDA welcomes the Employment Land Study and supports the key recommendations of the report and therefore supports Policy ED3 - Existing Employment Land in relation to this.

Change to Plan N/A

Appear at exam? Not Specified

Soundness Tests N/A

Core Strategy Submission Document

S - 16195 - 8119 - Policy ED3 - Existing Employment Land - None

16195 Support

CHAPTER 11 Policy ED3 - Existing Employment Land

Respondent: **Baltic Distribution Limited (Mr Robert Croshaw)** **Agent:** **N/A**
[8119]

Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
Essex
SS4 2HA
England
01702 258551

Full Text: With regard to para 4, we appreciate the support and look forward to the Highways assisting us in improvements, in order to retain and develop our existing business and increase rural employment

Summary: With regard to para 4, we appreciate the support and look forward to the Highways assisting us in improvements, in order to retain and develop our existing business and increase rural employment

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16213 - 9917 - Policy ED3 - Existing Employment Land - None

16213 Support

CHAPTER 11 Policy ED3 - Existing Employment Land

Respondent: Inner London Group [9917]

Inner London Group
P.O. Box 91
Benfleet,
Essex
SS7 2FF

Agent: Christopher Wickham Associates (Mr C Wickham)
[4961]

Christopher Wickham Associates
35 High Street
Highgate
London
N6 5JT

Full Text: The re-allocation of the sites at Stambridge Mills and Star Lane Industrial Estate is supported. Both Stambridge Mills and the former brickworks site at Star Lane (part of the Star Lane Industrial Estate site) have long been vacant. The redevelopment of these sites will minimise the need to release Green Belt land, and will allow for the removal of contamination, the re-use of existing on-site materials, and the environmental and ecological enhancement of the land and surrounding areas.

Summary: The re-allocation of the sites at Stambridge Mills and Star Lane Industrial Estate is supported. Both Stambridge Mills and the former brickworks site at Star Lane (part of the Star Lane Industrial Estate site) have long been vacant. The redevelopment of these sites will minimise the need to release Green Belt land, and will allow for the removal of contamination, the re-use of existing on-site materials, and the environmental and ecological enhancement of the land and surrounding areas.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16229 - 8650 - Policy ED3 - Existing Employment Land - i, ii

16229 Object

CHAPTER 11 Policy ED3 - Existing Employment Land

Respondent: Countryside Properties (Southern) Ltd (Mr Steve Price) [8650] **Agent:** N/A

Countryside Properties (Southern) Ltd
Countryside House
The Drive
Brentwood
Essex
CM13 3AT
01277260000

Full Text: As we have suggested in our representations regarding Housing, we question the ability to deliver all of the 4 employment sites identified for redevelopment in the Core Strategy (within the plan period). This is particularly the case for the Rawreth Lane Industrial Estate, Rayleigh.

We have serious doubts that the Rawreth Industrial Estate (identified for 220 units 2017/18 to 2019/20) will come forward for residential development. As we understand it, there are a considerable number of different landownerships involved. There are also many different tenants/occupiers. This suggests that land assembly, to enable a comprehensive development (the only way, we suggest, that development of this estate could take place) will be more than problematic and will take a considerable number of years to achieve (if at all). Even if other/an alternative site/land is identified for the possible relocation of existing occupiers, there is no guarantee that occupiers would want to relocate, with the possibility of incurring greater costs in new premises. Occupiers may be happy to stay where they are unless they wish to expand or upgrade premises.

We also think that there could be serious contamination issues at this site, further affecting delivery of a housing scheme/affecting development costs.

We are not aware that the council would have the will or the finances to undertake compulsory purchase to enable the sites redevelopment.

We are not aware that the council has contacted all or any of these landowners or occupiers to ascertain the potential to assemble land and deliver the redevelopment of this site.

Whilst we understand that the site gives rise to amenity nuisance to local residents, we are surprised that the council want to redevelop a successful commercial site that provides many jobs. The Employment Land Study (Oct 08) clearly states that buildings on this site are generally of good quality and that there is no vacant land or buildings at the time of survey. This indicates much success, and its proposed redevelopment could therefore result in the loss of important jobs.

This is just one example where we believe delivery of housing numbers on brownfield sites will be affected by land assembly or other constraints.

The council needs to demonstrate how they intend to deliver the 4 redevelopment sites identified in this policy, and put forward evidence they believe shows that such redevelopment can take place. If there are serious questions over delivery, such sites should not be identified for redevelopment. In any case, we question the wisdom of the identification of the Rawreth Lane site as it provides jobs and is well used, perhaps a site that complies with the first statement of the first part of Policy ED3. In the current climate, this seems an inappropriate strategy, as existing jobs should be retained rather than run the risk of losing existing employment opportunities.

Summary: We argue that there are serious delivery issues with some of the redevelopment sites identified in this policy, particularly the Rawreth lane industrial site. To ensure housing numbers are delivered/housing targets will be met and ensure the plan is flexible, we argue that the council should:

- (a) Bring forward one/some of the greenfield sites identified for 2015 onwards
- (b) Ensure that there is the ability to provide additional housing numbers at one or more of the identified Greenfield sites.
- (c) The Rawreth Lane Industrial estate be dropped from this policy/not allocated for residential development.

Change to Plan

As put forward in our representations to Policies H1 and H2 of the Core Strategy, we believe that as these employment redevelopment sites can not be relied upon to deliver housing within the plan period. We suggest that either the sites are dropped because of the serious constraints in delivery, or that if they remain identified, greater flexibility should be built into the Core Strategy to cover the likelihood that some of these sites (particularly Rawreth Lane) do not come forward in the time periods specified. To achieve this flexibility, there is a direct implication for the identified Greenfield sites. The plan should:

- (a) Bring forward those greenfield sites identified for 2015 onwards to provide some certainty that national/regional housing targets and annual build rates/5 year land supply can be met/achieved.
- (b) Ensure that there is the ability to provide additional housing numbers at one or more of the identified Greenfield sites. Housing numbers specified in Policy H2 should be minimums in any case, and a statement should be added to that

Core Strategy Submission Document

O - 16229 - 8650 - Policy ED3 - Existing Employment Land - i, ii

16229 Object

CHAPTER 11 Policy ED3 - Existing Employment Land

policy which says something along the lines that "there may be a possible requirement for greater housing numbers on some sites should other sources of housing, such as that on identified appropriate brownfield sites, not come forward as anticipated".

OR

(c) As we suggest, the Rawreth Lane site will be particularly difficult to deliver. Whether it is dropped from this policy, or retained, an appropriate strategy would be to allocate additional housing numbers on the land we promote, north of London Road, Rayleigh, to cover the possibility of failing to deliver housing on the Rawreth Lane site/in Rayleigh. We believe that the land we promote can accommodate a greater number of housing units than that specified in Policy H2. We cover this matter further in our representations to Policy H2.

We believe these approaches to be sensible and flexible. This will allow for appropriate flexibility in the plan, and we contest would make the plan sound.

This strategy would not, we believe, prejudice the aim of developing brownfield or previously developed land as such land will come forward as a result of interest in such sites/the market, notwithstanding the development of Greenfield sites.

Appear at exam? Yes

Soundness Tests i, ii

Core Strategy Submission Document

O - 16393 - 8267 - Policy ED3 - Existing Employment Land - ii, iii

16393 Object

CHAPTER 11 Policy ED3 - Existing Employment Land

Respondent: Aber Ltd [8267]

Aber Ltd
C/o Agent

Agent: Colliers CRE (Mr S Chapman) [8266]

Colliers CRE
9 Marylebone Lane
London
W1U 1HL
020 7344 6533

Full Text:

In order to meet the 3,000 new jobs required in the RSS, additional employment sites will be required, as the supply of employment land within the District is tight, any new sites will be require the release of Green Belt land. As these sites will be outside of the existing urban areas, it is unlikely that these sites will be in as sustainable locations as the existing employment sites.

The Employment Land Study recommends that any de-allocations of employment land be compensated for by the allocation of circa 18 hectares of land for new employment sites in the District.

The idea of not releasing land for residential and then releasing it for employment purposes is a contradiction, as it still requires the release of Green Belt.

With regards the site at Stambridge Mill, it is considered that this site should be safeguarded for light industrial use, instead of being redeveloped for housing; particularly, as this site is subject to a high risk of flood risk (Zone 3), and its redevelopment for residential would replace a less vulnerable use (employment) being replaced with a more vulnerable use (residential).

Reword first two paragraphs of the policy:

'Existing employment sites, which are sustainable, will be protected to ensure that they continue to provide employment generated opportunities, including the redevelopment for other employment uses.

As part of the review of existing employment sites, the Council will consider the reallocation of land at Star Land Industrial Estate, Eldon Way/ Foundry Industrial Estate and Rawreth Industrial Estate for appropriate uses, which should include a proportion of employment uses. Land capable of accommodating the business and industries that currently occupy these sites but would not be appropriate to be incorporated into their redevelopment will be allocated in new locations in accordance with Policy ED4.'

Summary:

In order to meet the 3,000 new jobs required in the RSS, additional employment sites will be required, as the supply of employment land within the District is tight, any new sites will be require the release of Green Belt land. As these sites will be outside of the existing urban areas, it is unlikely that these sites will be in as sustainable locations as the existing employment sites.

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Change to Plan

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Appear at exam? No

Soundness Tests ii, iii

Core Strategy Submission Document

O - 16433 - 13749 - Policy ED3 - Existing Employment Land - i

16433 Object

CHAPTER 11 Policy ED3 - Existing Employment Land

Respondent: Joan and Phil Smith [13749]

46 Woodpond Avenue
Hockley
Essex
SS5 4PX

Agent: N/A

Full Text: Re: Core Strategy for Hockley Redevelopment

I object to the Core Strategy for the following reasons;

You are ignoring the views of the local residents, who have overwhelmingly stated via the Hockley Parish Plan that they do not want any large-scale housing development in Hockley, but if there has to be some additional housing, there must be no loss of greenbelt or open spaces and any developments must be matched by the appropriate levels of infrastructure.

Our village needs improvements to build on what we have now rather than a long drawn out proposal, which, by the time it is agreed and completed will have seen Hockley become just a huge housing estate without a thriving centre, because many local businesses will have disappeared due to the dreadfully inadequate transport links.

Our roads simply cannot cope with the existing traffic volumes let alone the massive increase in traffic, which will result from the relocation of businesses and numerous housing developments.

Our village is surrounded by some of the most beautiful countryside in the district which we do not want to see disappear forever.

Listed below are some of the technical points as to why I object to the Core Strategy and why I believe it to be inaccurate, misleading and unsound.

By proposing to move employment at Hockley's two business estates to a green field site near the airport, which has no existing public transport links and being 2-3 miles from the nearest railway station, is contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions by placing a reliance on car transport as a means of getting to work.

Though RDC are proposing to upgrade the nearest road to a dual carriageway, the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway. This road is already horrendously busy and virtually grid locked at peak times, so this is quite unbelievable that with the predicted expansion of the airport and new industrial estate, there is no provision for the improvement of the B1013 through Hockley. The proposed development of the business estates for housing (and additional housing proposed for Hawkwell) also means an increase in the volume of traffic in the Hockley area with no provision for improvement or expansion to cope with the higher volume.

The site selected for the new industrial estate contravenes PPS4, which states that for "out-of-centre sites, preference is given to sites which are or will be well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car and which are close to the centre and have a high likelihood of forming links with the centre. As there is no existing public transport, there is no obvious likelihood of forming links with any existing centres. In addition, because of its remote location, accessed by the narrow, busy B1013; it is not suitable for access by cycle or on foot.

It also contravenes PPS1, which states reducing the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

PPS12 4.9 states the infrastructure planning process should identify, as far as possible: infrastructure needs and costs. Neither needs nor, especially, costs have been identified. The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

16433 Object

CHAPTER 11 Policy ED3 - Existing Employment Land

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned. No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation. Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. There no cross-referencing between concurrent plans affecting the exact same piece of land.

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent, which HAAP will need to follow, and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. It states "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floor space".

What the R&LS actually states is:

- 1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.
- 2) (10.28) "There is no immediate capacity for additional floor space."
- 3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion"
- 4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Invest in what we already have rather than forcing upon us something none of us have asked for. Most people would agree that Hockley needs a facelift but it does not need changing beyond all recognition. This strategy does not propose to deal with the issues that affect this area now, and does not propose to deal with these same issues that will be exacerbated further by the proposals that are being made. Attached are some ideas for relatively quickly achievable solutions, which would enhance the village and deal with some of the traffic problems, without losing "Hockley". We live here because we like it - if we didn't we would have moved!

Make the Spa Pub the roundabout, which would greatly reduce the junction exit combinations that exist at the current mini roundabout.

Traffic will still be able to flow when the brewery lorry parks up - it is very dangerous trying to manoeuvre round it onto that mini roundabout, as you cannot see vehicles coming the other way.

Core Strategy Submission Document

16433 Object

CHAPTER 11 Policy ED3 - Existing Employment Land

Hockley Ideas:

Demolish the "Alldays" building and use that space to create the "village square", which could be landscaped or used in the way the Rayleigh Market car park is used - farmers markets, market days, parking on non market days. This would maintain the existing focal point of Hockley, the High Street, therefore not being detrimental to the shops on the other side of the road. It would also provide a possible link to the Leisure facilities in Eldon Way.

Summary:

By proposing to move employment at Hockley's two business estates to a green field site near the airport, which has no existing public transport links and being 2-3 miles from the nearest railway station, is contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions by placing a reliance on car transport as a means of getting to work.

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The site selected for the new industrial estate contravenes PPS4, which states that for "out-of-centre sites, preference is given to sites which are or will be well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car and which are close to the centre and have a high likelihood of forming links with the centre. As there is no existing public transport, there is no obvious likelihood of forming links with any existing centres. In addition, because of its remote location, accessed by the narrow, busy B1013; it is not suitable for access by cycle or on foot.

It also contravenes PPS1, which states reducing the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

PPS12 4.9 states the infrastructure planning process should identify, as far as possible: infrastructure needs and costs. Neither needs nor, especially, costs have been identified. The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16561 - 8324 - Policy ED3 - Existing Employment Land - i, ii

16561 Object

CHAPTER 11 Policy ED3 - Existing Employment Land

Respondent: Mr J Needs & Aston Unit Trust [8324]

C/o Sellwood Planning
Stoughton Cross House
Stoughton Cross
Wedmore
Somerset
BS28 4QP

Agent: Sellwood Planning (Mr R M Sellwood) [5054]

Sellwood Planning
Stoughton Cross House
Stoughton Cross
Wedmore
Somerset
BS28 4QP

Full Text:

Paragraph 11.32 states that 18.1h of employment land will be de-allocated. However, Policy ED3 states that 'other appropriate uses' may include a proportion of employment uses. This means that the net loss of employment land could be less than 18.1h. If the net area is less, and the potential alternative uses are wider than just residential, the potential residential yield of 795 units (see Breakdown of Trajectory by Source p57) may be significantly less.

The Core Strategy does not deal with the issue of the timing inter-relationship between Policy ED3 and Policy ED4. There are a range of outcomes, the most extreme of which are

(a) the ED3 'deallocated' sites are redeveloped for other uses very quickly, but the new ED4 employment sites come forward more slowly. In these circumstances, there could be a severe reduction in the availability of employment land in the District with associated adverse affects on the local economy

(b) the ED3 'deallocated' sites are not redeveloped for other uses but the new ED4 sites come forward quickly. In these circumstances there could be an excess supply of employment land in the District.

The Core Strategy should explicitly recognise these potential outcomes and include the contingencies that would be put in place to avoid either an over supply or under supply of employment land.

Policy ED4 also does not consider the nature of the employment sectors which the deallocated ED3 sites serve compared to those which the new ED4 sites will serve. By definition, the employment sites proposed to be deallocated are poor quality industrial areas containing low grade premises. However, this also means these are inexpensive premises which are well suited to new start up firms or those types of firms which cannot afford high rental premises. In contrast, the new ED4 employment sites will be newly built premises which will inevitably command a much higher rental which most of the firms displaced from the ED3 sites will not be able to afford. The Core Strategy should deal with this issue by providing evidence that there are sufficient other low rental premises available in Rochford District to accommodate displaced businesses. There is a danger that the Core Strategy proposals will have unintentional adverse consequences in removing a tier of low value employment accommodation and providing no viable replacement for the displaced occupiers.

Policies ED3 and ED4 need to be reassessed

- to deal with the timing interrelationship between Policies ED3 and ED4
- to confirm that sufficient low value employment premises remain in the District to accommodate the firms displaced from the deallocated ED3 sites. If insufficient land remains, the sites proposed to be deallocated will need to be reassessed to see whether some would be more appropriately retained in low value employment use. This in turn, could impact on the housing yield anticipated from the ED3 sites.

It is considered that our participation at the oral part of the public examination would assist the Inspector for two main reasons

- Sellwood Planning has a detailed knowledge of the Rochford area, appeared at the last Local Plan Inquiry and was a participant at the RSS public examination. This direct knowledge of the local area and the statutory Development Plan may be of assistance to the Inspector
- Sellwood Planning has experience in promoting major schemes through Core Strategies (eg. 7,000 dwellings in Ashford, 5,750 dwellings in Dover, 2,500 dwellings in Horsham and 1,200 dwellings in Newmarket) and the emerging body of evidence of what constitutes a sound Core Strategy and what is unsound. Our experience indicates that, in a number of respects, the submitted Core Strategy is unsound in its present form.

Summary:

Paragraph 11.32 states that 18.1h of employment land will be de-allocated. However, Policy ED3 states that 'other appropriate uses' may include a proportion of employment uses. This means that the net loss of employment land could be less than 18.1h. If the net area is less, and the potential alternative uses are wider than just residential, the potential residential yield of 795 units (see Breakdown of Trajectory by Source p57) may be significantly less.

The Core Strategy does not deal with the issue of the timing inter-relationship between Policy ED3 and Policy ED4. There are a range of outcomes, the most extreme of which are

(a) the ED3 'deallocated' sites are redeveloped for other uses very quickly, but the new ED4 employment sites come forward more slowly. In these circumstances, there could be a severe reduction in the availability of employment land in the District with associated adverse affects on the local economy

Core Strategy Submission Document

O - 16561 - 8324 - Policy ED3 - Existing Employment Land - i, ii

16561 Object

CHAPTER 11 Policy ED3 - Existing Employment Land

(b) the ED3 'deallocated' sites are not redeveloped for other uses but the new ED4 sites come forward quickly. In these circumstances there could be an excess supply of employment land in the District.

The Core Strategy should explicitly recognise these potential outcomes and include the contingencies that would be put in place to avoid either an over supply or under supply of employment land.

Policy ED4 also does not consider the nature of the employment sectors which the deallocated ED3 sites serve compared to those which the new ED4 sites will serve. By definition, the employment sites proposed to be deallocated are poor quality industrial areas containing low grade premises. However, this also means these are inexpensive premises which are well suited to new start up firms or those types of firms which cannot afford high rental premises. In contrast, the new ED4 employment sites will be newly built premises which will inevitably command a much higher rental which most of the firms displaced from the ED3 sites will not be able to afford. The Core Strategy should deal with this issue by providing evidence that there are sufficient other low rental premises available in Rochford District to accommodate displaced businesses. There is a danger that the Core Strategy proposals will have unintentional adverse consequences in removing a tier of low value employment accommodation and providing no viable replacement for the displaced occupiers.

Change to Plan Policies ED3 and ED4 need to be reassessed
- to deal with the timing interrelationship between Policies ED3 and ED4
- to confirm that sufficient low value employment premises remain in the District to accommodate the firms displaced from the deallocated ED3 sites. If insufficient land remains, the sites proposed to be deallocated will need to be reassessed to see whether some would be more appropriately retained in low value employment use. This in turn, could impact on the housing yield anticipated from the ED3 sites.

Appear at exam? Yes **Soundness Tests** i, ii

Core Strategy Submission Document

S - 16692 - 9072 - Policy ED3 - Existing Employment Land - None

16692 Support

CHAPTER 11 Policy ED3 - Existing Employment Land

Respondent: Essex County Council (Mr Roy Lewis) [9072] **Agent:** N/A

Essex County Council
ESH - Spatial Planning
Planning and Transport
County Hall
Chelmsford
CM1 4JU
01245-437578

Full Text: ROCHFORD CORE STRATEGY SUBMISSION DOCUMENT, SEPTEMBER 2009
RESPONSE OF ESSEX COUNTY COUNCIL

1. General Comment

Essex County Council welcomes and broadly supports the Core Strategy prepared by Rochford District Council. The Strategy contains policies and proposals that address the spatial characteristics, issues and opportunities facing the District whilst respecting the distinctive qualities of the different settlements and parts of the District.

The County Council fully supports the maintenance of a strong policy approach to protection of the Green Belt and of the quality of environmental assets in the District whilst making adequate housing and employment provision within the District. The Core Strategy presents an approach that emphasises a balance of opportunity through the District and recognition of emerging economic prospects in the District and neighbouring areas. The intended preparation of more detailed Action Area Plans for London Southend Airport and its environs and for each of the three town centres of Rayleigh, Rochford and Hockley will further enhance the approach of the Core Strategy. The emphasis on the three town centres is particularly welcomed as offering a stimulus to improvement in the services and facilities available locally within the District whilst also affording possibilities of increased community focus.

2. Housing Distribution and Locations

The East of England Plan requires Rochford to provide a minimum of 3,790 additional dwellings between 2006 and 2021. In addition, provision for a further 1,000 dwellings should be made between 2021 and 2025 to ensure delivery of housing for at least 15 years from adoption of the Core Strategy (expected in 2010). Of this total requirement the District Council has identified a capacity of 2,000 dwellings through a Strategic Housing Land Availability Assessment. This means that the Core Strategy has to identify locations for about 1,750 dwellings to be delivered before 2021 and a further 1,000 dwellings between 2021 and 2025.

Policy H1 (The efficient use of land for housing) is supported. However, prioritisation of the reuse of previously developed land within settlements for additional housing is unlikely to provide a sufficient source of provision due to the generally residential nature of existing settlements in the district and the absence of potentially large sites of previously developed land. The assessment of potential for additional housing provision within settlements already includes the proposed re-allocation to substantially residential use of 4 existing employment areas.

Within Policy H2 (Extensions to residential envelopes and phasing) and Policy H3 (Extension to residential envelopes post-2021) the District Council has adopted a balanced approach to the distribution of additional housing locations, which is based on identification of tiers of settlements defined by reference to their accessibility to jobs, services and facilities (some of which lie outside the District) and the need to protect the valued environments within the District. This approach is generally supported, although implementation and delivery of individual schemes should give further thought to securing sustainable functional relationships between proposed development locations and availability of jobs, services and facilities.

The proposed scale and phasing of development at each of the identified locations in Policy H2 and Policy H3 should be capable of being supported by County Council service groups, provided that adequate and timely funding is available. The County Council would wish to work with the District Council to ensure that future infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

3. Economic Development

The approach to Employment Growth (Policy ED1) is supported. Given the economic structure of Rochford District the support to be given to protection and enhancement of the role of small and medium sized businesses; enhancement of the District's commercial centres; and development of a skills training academy is particularly welcome. These measures will assist in building on the existing economic resource of the District.

Proposals for the comprehensive development of London Southend Airport and its environs (Policy ED2) are supported.

Core Strategy Submission Document

S - 16692 - 9072 - Policy ED3 - Existing Employment Land - None

16692 Support

CHAPTER 11 Policy ED3 - Existing Employment Land

The further elaboration of proposals through an Area Action Plan will provide a firm foundation to realise the economic regeneration and growth opportunities presented by effective use of the Airport. The recognition of the potential environmental impact of the Airport and the commitment to work to mitigate any adverse impacts on the environment and local amenities is fully supported.

The location of the proposed Eco-Enterprise Centre to the North of London Southend Airport (Policy ED4) is supported. Creation of the Centre would assist reduction of the rate of business start-up failure in the district. Further the proposed location for the Centre would afford a clear offer to businesses within an area of varied business activity.

The continued protection and enhancement of existing employment land (Policy ED3) is supported, as is the identification of 4 existing employment sites for appropriate alternative, substantially residential, uses. Each of the 4 sites affords particular issues and opportunities whereby their redevelopment for other uses and relocation of existing occupiers would confer advantage for the immediately neighbouring areas and for the District as a whole.

4. Town Centres

The town centres of Rayleigh, Rochford and Hockley, and future plans for them, are closely linked to the economic development of the District but also present the opportunity to offer greater community focus within the District. The varied approach being taken to each of these town centres is supported (Policy RTC4, RTC5 and RTC6), notably the recognition of the role and purpose of the town centres beyond retail uses.

The contribution that the County Library service could make to plans for the town centres should not be overlooked. The 5 libraries in the District are substantial footfall draws in their localities and act as a 'community anchor store'. This has knock-on effects in encouraging use of neighbouring retail and service facilities. Further the Library service is currently looking at co-location opportunities for other services within the libraries which would enable them to act as a community focus.

5. Transport

The transport aspects of the Core Strategy are well balanced in identifying potential measures that would meet the needs of existing residents and businesses in the District as well as needs arising from future development. The approach reflects and makes good reference to the transportation aspirations of the County Council. The policy emphasis on close working between the District Council and the County Council to advance the transport aspirations is welcomed and fully supported.

In relation to parking standards (Policy T8 and Paragraph 10.30) the review undertaken by Essex County Council in conjunction with the Essex Planning Officers Association has now been completed. Revised parking standards have been agreed and signed off as County Supplementary Guidance, in accordance with PPS12, and is being applied by the County Council as Local Highways Authority.

6. Coastal Protection Belt

Policy ENV2 (Coastal Protection Belt) is not supported because in its current form it is not a suitable or effective replacement policy for Policy CC1 of the Replacement Structure Plan. Structure Plan Policy CC1 (The Undeveloped Coast - Coastal Protection Belt) currently remains a 'saved' policy of the Essex and Southend-on-Sea Replacement Structure Plan, April 2001 (following a direction of the Secretary of State, dated 27th September 2007, under paragraph 1(3) of Schedule 8 to the Planning and Compulsory Purchase Act 2004). The existing Policy CC1 reads, 'Within the Coastal Protection Belt defined in adopted local plans there shall be the most stringent restrictions on development within the rural and undeveloped coastline situated outside existing built-up areas, and any development which is exceptionally permitted within this Belt shall not adversely affect the open and rural character, historic features or wildlife.'

Core Strategy Policy ENV2 should be revised to include specific reference to,

- * Definition of the boundary of the Coastal Protection Belt in another Development Plan Document;
- * the application of the most stringent restrictions on development within the rural and undeveloped coastline;
- * any development exceptionally permitted not adversely affecting the open and rural character, historic features or wildlife.

7. Historic Environment

The importance of the historic environment in Rochford District is clearly identified within the Core Strategy document. Nevertheless, the policy guidance could be usefully enhanced to promote consideration and enhancement of the historic environment and use of the historic environment to shape place. This would be achieved by the following amendments to the Core Strategy,

- * Policy ENV1 (Protection and Enhancement of the Natural Landscape and Habitats and the Protection of Historical and Archaeological Sites) should be amended by deletion of the final sentence and its replacement with, 'The Council is committed to the protection, promotion and enhancement of the diverse historic landscape and extensive surviving archaeological deposits of the District.'

Core Strategy Submission Document

S - 16692 - 9072 - Policy ED3 - Existing Employment Land - None

16692 Support

CHAPTER 11 Policy ED3 - Existing Employment Land

* Paragraph 8.15 of the supporting text should be amended to better support the suggested amendment to Policy ENV1. The existing text of Paragraph 8.15 should be deleted in its entirety and replaced by,
The historic environment of Rochford District has developed through a history of human activity that spans over 450,000 years. Much of the resource lies hidden beneath the ground in the form of archaeological deposits. Other elements such as the historic landscape, the pattern of field, farms, woods and grazing marsh which characterise the District, are a highly visible record of millennia of agriculture, industry and commerce. Of particular significance are the coastal, island and estuarine areas where multi-period landscapes reflecting the exploitation of coastal and marshland resource survive. The District also includes the important historic medieval market towns of Rochford and Rayleigh.

* Page 16 (Sustainable Community Strategy Priority: Promoting a Greener District) should be amended to further support the approach to the Historic Environment. The fourth bullet of the Key Section/Policies of the Core Strategy should be amended to include the word 'historic', so that the first sentence of the bullet would read,
The Environment chapter seeks to protect and enhance the biodiversity, historic and natural environment of the District by protecting sites of local, national and international importance.

8. Community Infrastructure

The approach to Community Infrastructure is supported. The County Council would wish to work with the District Council to ensure that future community infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

In addition, it should be noted that,

* Some County Council services are not highly visible despite being regarded as highly desirable community services by local residents. The need to ensure adequate funding and contributions to enable these services to meet community expectations should be recognised and acknowledged in consideration of planning obligations and standard charges.

* The Adult Community Learning Centre at Rocheway, Rochford could be better located with regard to the wider Rochford/Castle Point area of service. Relocation of the Centre could provide opportunities both at the new location and for the current site.

* The Core Strategy should make specific reference to,

o Appendix H1, Location at South Canewdon: new Early Years and Childcare facilities;

o Policy CLT2, final sentence: insert after the words 'primary schools' the words 'and Early Years and Childcare facilities';

o Appendix CLT1, Other issues/comment: for Early years and childcare facilities add 'Land to be allocated within new residential areas, as appropriate'.

9. Implementation, Delivery and Monitoring

The inclusion in the Core Strategy of a section considering Implementation, Delivery and Monitoring is welcomed and supported. Nevertheless, the District Council, in moving towards implementation and delivery of the individual elements of the Core Strategy, should highlight those schemes and projects that are critical to achievement of other aspects of the Strategy.

Further, the monitoring proposal for Policy H6 (Lifetime Homes) and for Policy CP1 (Design) should be amended,

* Policy H6 (Lifetime Homes) - the identified monitoring tool is Core Indicator H6 Housing Quality Building for Life Assessments. The Building for Life Assessment methodology was devised to measure the overall design/layout quality of housing developments. It was not devised to measure compliance with Lifetime Homes, which is largely, but not exclusively, concerned with internal space standards and the provision of internal arrangements within dwellings to meet needs of all residents.

* Policy CP1 (Design) - the monitoring indicator proposed by the Core Strategy is not supported because it is unclear what the indicator would actually be measuring. The proposed indicator should be replaced by the Core Indicator, Housing Quality - Building for Life Assessments, as suggested by the County Council in its response to the Core Strategy Preferred Options, October 2008. A better approach would be to base evaluation and monitoring of Policy CP1 on the Commission for Architecture and the Built Environment's (CABE) 20 Building for Life principles, particularly as Government has endorsed these principles and is urging local authorities to use them to assess design quality. It is suggested that the monitoring arrangements for Preferred Option CP1 be deleted and replaced by the following text, 'The success of the implementation of this policy will be monitored by assessing schemes, or an appropriate sample of schemes, against the Commission for Architecture and the Built Environment's (CABE) Building for Life principles.'

10. Access to Housing

The Core Strategy notes the higher prevalence of older people in Rochford District and the need to support them. However, a more broadly based approach to access to housing should be adopted by Policies H4, H5 and H6. It should recognise the presence of other vulnerable adults in the community, for example, those with learning or mental health disability, and the range of possible forms of accommodation, including supported, sheltered and extra care accommodation. The high level of owner occupation in the District further emphasises the need for a broader approach. The emphasis on Lifetime Homes would not address the variety of future needs, whilst the potential exemptions to the

Core Strategy Submission Document

S - 16692 - 9072 - Policy ED3 - Existing Employment Land - None

16692 Support

CHAPTER 11 Policy ED3 - Existing Employment Land

Lifetime Homes policy standard in Policy H6 are likely to act against demographic trends.

Summary: The continued protection and enhancement of existing employment land (Policy ED3) is supported, as is the identification of 4 existing employment sites for appropriate alternative, substantially residential, uses. Each of the 4 sites affords particular issues and opportunities whereby their redevelopment for other uses and relocation of existing occupiers would confer advantage for the immediately neighbouring areas and for the District as a whole.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16718 - 7834 - Policy ED3 - Existing Employment Land - i

16718 Object

CHAPTER 11 Policy ED3 - Existing Employment Land

Respondent: Ms G Yeadell [7834]

6 Southend Road
Hockley
Essex
SS5 4QQ
01702 205450

Agent: N/A

Full Text: Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1

Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2 you discarded N.E.Hockley as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley..along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

Response to C.S Preferred Options 2008 and HAAP 2009

June 2009 issue C S Submission issue says Eldon Way will be used for housing, whereas Sept.2009 issue says "alternative uses, including residential.." to be decided by HAAP (Issues consultation done, Pref.Options issue awaited, but judging from JAAP Pref.Options decision - namely biggest option chosen against overriding opposition, it will be housing).

Need to be logical and even-handed in proposals

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

Establish likely level of Standard Charges. Accept you cannot turn district into motorways with wholesale demolition.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

Para.10.5 "..highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which cannot be altered without much destruction.

Reply to CS Pref. Options 2008 & HAAP Issues/Options 2009

Policy T3, CLT1 Appendix CLT1 Public transport RDC admits this is in the private sector. In Hockley, operator has cut No7 service to 1 per hour from Ashingdon Schools, claiming it is unviable beyond. This is unlikely to change as Hockley is car dependant. No8 bus through Hawkwell is cut to 1 per hour to Rayleigh, for same reason as No7. Proposed planning agreements with developers can't run: eg, a community centre or classroom given by a developer remains once he has moved on - how can that apply for an on-going bus service?

Reply to Infrastructure Transport in CS Pref. Opts. 2008 and to HAAP Issues Opts. 2009.

Ch.11 Economic development

Policy ED3 Core Strategy preferred Options 2008 hinted at possible housing in Eldon Way site. June 2009 Submission version, without consultation, said Eldon Way would be housing (map included Foundry, not the text). September 2009 Submission said redevelopment would be in HAAP (which apart from the Issues/Options version, is unfinished. Judging from results of JAAP Preferred Options where biggest option is chosen, though most respondents were against it, site will be housing, without consultation.

Core Strategy Submission Document

O - 16718 - 7834 - Policy ED3 - Existing Employment Land - i

16718 Object

CHAPTER 11 Policy ED3 - Existing Employment Land

Para.1.25, Para.11.32 Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to accommodated employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

Reply to HAAP Issues Options 2009

Remove compulsory relocation

Policy ED4 Policy states Council will allocate 18ha of land to make up for de-allocations in ED3 - that proves point above.

Proposals for moving employment to out of town locations with no existing transport links are contrary to government policies PPG4, PPS1 and PPS4 and Core Strategy Policy T1.

Evidence Base is ignored by contravening Hockley Parish Plan 2007 and ignoring residents' views on HAAP Issues/Options. Next stage of HAAP Preferred Options is pre-empted and rendered irrelevant. Core Strategy plans to relocate Eldon Way Foundry estate to Greenfield site with no nearby bus or railway. RDC plans to upgrade the nearest road to dual carriageway, though the connecting B1013 (through Hockley) will stay single, said by ECC Highways statistics to be 72% capacity. Airport bosses and council cannot suggest there will be no traffic growth from JAAP and new industrial site.

Reply to Hockley Parish Plan 2007. HAAP Issues 2009

Move to new industrial site near airport contravenes PPS4:

- EC7.3C "out of centre sites, with preference given to sites...well served by choice of...transport and...close to centre and...high likelihood of forming links with centre". There is no current public transport and links with centres is unlikely".

- EC 7.5.1 "whether the site is or will be accessible and well served by choice of transport, public transport, walking and cycling, as well as by car...". Remote location, narrow busy B1013 makes the site unsuitable for access by cycle or on foot.

It also contravenes PPS1 (27vii)... "reduce need to travel, encourage accessible public transport provision to secure more sustainable patterns of transport...Planning should actively manage patterns of urban growth to make fullest use of public transport and focus development in existing centres, near to major public transport interchanges". Core Strategy undermines its own policy Transport and Highways policy T1 and is unsound.

Although shown on accompanying drawing in earlier versions, there was no prior textual mention of Foundry industrial estate (next to Eldon Way) for redevelopment until current CS 2009 Submission. This was stated to be a typing error, but does not inspire confidence in reliability of drafting.

Revise both 2009 Core Strategy and 2009 HAAP Issues/options

Chapter 12: Retail/Town centres

The Core Strategy misrepresents findings of the Retail and Leisure Study 2008.

Para.12.38 The Core Strategy states (para.12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace."

Whereas the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure".

2) (10.28) "There is no immediate capacity for additional floorspace".

3) (10.29) "we recommend focus be maintained on developing Hockley's existing strengths, rather than retail expansion"

4) 10.31 "the current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it has a very small catchment population. Accordingly, the council may wish to consider reclassifying Hockley from a town centre to a district centre".

Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

The Council will work with landowners and its partners to deliver the HAAP.

Remove threat of compulsory purchase orders.

Core Strategy Submission Document

O - 16718 - 7834 - Policy ED3 - Existing Employment Land - i

16718 Object

CHAPTER 11 Policy ED3 - Existing Employment Land

One doesn't perceive impartiality when the Planning Director replies to local HAAP survey with "The affluent people of Hockley are entitled to famous name shops".

Chapter 5: Character of Place and Local Lists

Para.5.4 "Rochford district has unique character..stems from traditional buildings..still dominate towns and villages".

Para.5.17 "Council believes many buildings..are of local distinctiveness..part of..cherished local scene".

This only applies to favoured places: Rochford, Rayleigh, greenbelt villages. Many Hockley conservable items have been systemically removed for supposedly lucrative development in face of widespread protect. This is for supposed need for housing. In fact heritage items have been replaced by dwellings most cannot afford, and/or are hard to sell due to unsuitability of massing and siting. Many other homes are jeopardised by this practice.

HAAP issues 2009. Core Strategy 2006, 2007,2008, SCI.2006

Fewer 'vested interests', more even handedness. No more pressing people out of businesses, homes for expediency.

A CPRE Fieldwork issue extolled Local Lists, citing refusal of 16 flats to replace character house, not on local list. Inspector said house, facade made a contribution to area character, even if English heritage decided it didn't warrant listing. Council worked to get the house grade listed and even made adjacent area conservation one.

Hockley had one such on a "significant site" faced with 13 flats. Ward Member omitted house from refusal proposal, so house could be demolished. RDC dropped Local List ahead of appeal: "Government frowned on such Lists" (Other LAs, unaware of supposed directive retained theirs. After demolition RDC restored Local Lists, saying Government now support them. When Inspector queried the complaint, the then policy officer said "just politics, lot of local interest, nothing of character in the area[!]. (A dozen such items had been removed). Some "distinctive" Hockley buildings are still condemned (in Greensward Lane.; others threatened (Spa Road). Whereas a modest hue and cry in Rayleigh will usually result in a building being saved.

Conclusion

Core Strategy Submission DPD is basically unsound in many respects

Incomplete information. Amongst others, it refers to Hockley AAP, the first stage of which is complete, but not other three. Rochford AAP first stage has been published in arrears of Core Strategy Submission. Rayleigh AAP is still awaited. Precise housing sites are absent, as Urban Capacity Study 2007 has been superseded by Strategic Housing Land Availability Assessment, not yet published. Traders, residents, are thus responding to Core Strategy Submission with incomplete information.

Lack of community involvement. Chapter 1, Introduction, para. 1.11 "Community involvement is an essential part of the plan making process".

In Statement of Community Involvement 2006 Rochford RDC "recognises need to enable people to have their voices heard".

Re Public Meetings: "Consideration will be had to timing and venue to ensure meeting is as accessible as possible".

Take Hockley Area Action Plan as an example of the opposite of all this:- Presentation of document was at Hullbridge, 7.30pm. It was also discussed with JAAP at Rochford Freight House (for traders only) at 7am, without publicity. Excuse made: HAAP on RDC website, which none will seek unless knowing it is there. Rochford District Matters newsheet had minute articles on p.3, half way through consultation period. Another excuse: a 2nd presentation by Hockley Residents Association with planning officer present: only because of complaints, and it is not the HRA's responsibility to RDC's job. Due to unavoidable haste of calling meeting, few knew and only 50 were present.

In Core Strategy Submission Hockley Parish Plan has been ignored. Proposals also ignore 95% rejection rate response to HAAP 2009, which included proposals for Eldon Way employment site.

Unfettered right of developers to carry on as if Core Strategy didn't exist. In PPS 12, Ch.4.6 states: "Core Strategies should be flexible and able to show how they handle contingencies". Several large planning applications have been submitted proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS 12.

Where are we? Finally, at Chapter 1, Introduction, para. 1.24: "the Core Strategy will have to be reviewed in the event of a new Local Area Agreement, post-2011, setting different priorities". So what purpose does all this work serve? So we have hardly finished this exercise, before it all starts again?

Summary:

Ch.11 Economic development

Policy ED3 Core Strategy preferred Options 2008 hinted at possible housing in Eldon Way site. June 2009 Submission

Core Strategy Submission Document

16718 Object

CHAPTER 11 Policy ED3 - Existing Employment Land

version, without consultation, said Eldon Way would be housing (map included Foundry, not the text). September 2009 Submission said redevelopment would be in HAAP (which apart from the Issues/Options version, is unfinished. Judging from results of JAAP Preferred Options where biggest option is chosen, though most respondents were against it, site will be housing, without consultation.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16752 - 14229 - Policy ED3 - Existing Employment Land - i, iii

16752 Object

CHAPTER 11 Policy ED3 - Existing Employment Land

Respondent: Hockley Under Threat (J Abbey) [14229]

Hockley Under Threat
None provided

Agent: N/A

Full Text:

Ch. 4 Housing; Ch.10 Transport, Highways; Ch.11 Economic Development; Ch.12 Retail/town centres; Ch.5 Character of place & Local Lists

Chapter 4: Housing

Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1, Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2

N.E.Hockley was discarded as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley...along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

Need to be logical and even-handed in proposals

June 2009 issue C S Submission issue says Eldon Way will be used for housing, whereas Sept.2009 issue says "alternative uses, including residential.." to be decided by HAAP (Issues consultation done, Pref.Options issue awaited, but judging from JAAP Pref.Options decision - namely biggest option chosen against overriding opposition, it will be housing).

Policy H1, T1 Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG14 & PPS1. it also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths",

The Core Strategy also contravenes its own policy T1 and is unsound.

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

Establish like motorways with wholesale demolition.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts.

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Para.10.5

Policy T3, CLT1 Appendix CLT1

T1 & T2 "...highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which

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cannot be altered without much destruction.

Public transport RDC admits this is in the private sector. In Hockley, operator has cut No 7 service to one per hour from Ashingdon Schools, claiming it is unviable beyond. This is unlikely to change as Hockley is car dependant. No 8 bus through Hawkwell is cut to one per hour to Rayleigh, for same reason as No 7. Proposed planning agreements with developers can't run: e.g., a community centre or classroom given by a developer remains once he has moved on - how can that apply for an on-going bus service?

Ch.11 Economic development

Policy ED3 Core Strategy preferred Options 2008 hinted at possible housing in Eldon Way site. June 2009 Submission version, without consultation, said Eldon Way would be housing (map included Foundry, not the text). September 2009 Submission said redevelopment would be in HAAP (which apart from the Issues/Options version, is unfinished. Judging from results of JAAP Preferred Options where biggest option is chosen, though most respondents were against it, site will be housing, without consultation.

Para.1.25 Para.11.32

Policy ED4 T1 & T2 Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to accommodated employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

Remove compulsory relocation

Policy states Council will allocate 18ha of land to make up for de-allocations in ED3 - that proves point above.

Proposals for moving employment to out of town locations with no existing transport links are contrary to government policies PPG4, PPS1 and PPS4 and Core Strategy Policy T1.

Evidence Base is ignored by contravening Hockley Parish Plan 2007 and ignoring residents' views on HAAP Issues/Options. Next stage of HAAP Preferred Options is pre-empted and rendered irrelevant.

Core Strategy plans to relocate Eldon Way Foundry estate to Greenfield site with no nearby bus or railway. RDC plans to upgrade the nearest road to dual carriageway, though the connecting B1013 (through Hockley) will stay single, said by ECC Highways statistics to be 72% capacity. Airport bosses and council cannot suggest there will be no traffic growth from JAAP and new industrial site.

Revise both 2009 Core Strategy and 2009 HAAP Issues/options

Move to new industrial site near airport contravenes PPS4:

EC7.3C "out of centre sites, with preference given to sites..well served by choice of..transport and..close to centre and..high likelihood of forming links with centre". There is no current public transport and links with centres is unlikely".

EC 7.5.1 "whether the site is or will be accessible and well served by choice of transport, public transport, walking and cycling, as well as by car..". Remote location, narrow busy B1013 makes the site unsuitable for access by cycle or on foot.

It also contravenes PPS1 (27vii).. "reduce need to travel, encourage accessible public transport provision to secure more sustainable patterns of transport..Planning should actively manage patterns of urban growth to make fullest use of public transport and focus development in existing centres, near to major public transport interchanges". Core Strategy undermines its own policy Transport and Highways policy T1 and is unsound.

H1 & RTC6 Although shown on accompanying drawing in earlier versions, there was no prior textual mention of Foundry industrial estate (next to Eldon Way) for redevelopment until current CS 2009 Submission. In recent amendment to the CS this was stated to be due to a typing error!

Chapter 12: Retail/Town centres

The Core Strategy misrepresents findings of the Retail and Leisure Study 2008.

Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

Para.12.38 H1 & RTC6 The Core Strategy states (para.12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace."

Whereas the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food

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shopping expenditure".

2) (10.28) "There is no immediate capacity for additional floorspace".

3) (10.29) "we recommend focus be maintained on developing Hockley's existing strengths, rather than retail expansion"

4) 10.31 "the current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it has a very small catchment population. Accordingly, the council may wish to consider reclassifying Hockley from a town centre to a district centre".

Remove threat of compulsory purchase orders.

The Council will work with landowners and its partners to deliver the HAAP.

Chapter 5: Character of Place and Local Lists

Para.5.4 "Rochford district has unique character..stems from traditional buildings..still dominate towns and villages".

Para.5.17 "Council believes many buildings..are of local distinctiveness..part of..cherished local scene".

This only appears to apply to certain places: Rochford, Rayleigh, greenbelt villages. Many Hockley conservable items have been systemically removed for supposedly lucrative development in face of widespread protect. This is for supposed need for housing. In fact heritage items have been replaced by dwellings most cannot afford, and/or are hard to sell due to unsuitability of massing and siting. Many other homes are jeopardised by this practice.

Conclusion

Core Strategy Submission DPD is basically unsound in many respects:

Incomplete information. Amongst others, it refers to Hockley AAP, the first stage of which is complete, but not other three. Rochford AAP first stage has been published in arrears of Core Strategy Submission. Rayleigh AAP is still awaited. Precise housing sites are absent, as Urban Capacity Study 2007 has been superseded by Strategic Housing Land Availability Assessment, not yet published. Traders, residents, are thus responding to Core Strategy Submission with incomplete information.

Lack of community involvement. Chapter 1, Introduction, para. 1.11 "Community involvement is an essential part of the plan making process". In Statement of Community Involvement 2006 Rochford RDC "recognises need to enable people..to have their voices heard".

Re Public Meetings: "Consideration will be had to timing and venue to ensure meeting is as accessible as possible".

Hockley Area Action Plan as an example of the opposite of all this:- Presentation of document was at Hullbridge, 7.30 p.m. It was also discussed with JAAP at Rochford Freight House (for traders only) at 7 a.m., without publicity. Excuse made: HAAP on RDC website, which none will seek unless knowing it is there. Rochford District Matters newsheet had minute articles on p.3, half way through consultation period. Another excuse: a second presentation by Hockley Residents Association with planning officer present: only because of complaints, and it is not the HRA's responsibility to RDC's job. Due to unavoidable haste of calling meeting, few knew and only 50 were present.

In Core Strategy Submission Hockley Parish Plan has been ignored. Proposals also ignore 95% rejection rate response to HAAP 2009, which included proposals for Eldon Way employment site.

Unfettered right of developers to carry on as if Core Strategy didn't exist. In PPS 12, Ch.4.6 states: "Core Strategies should be flexible and able to show how they handle contingencies". Several large planning applications have been submitted proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS 12.

Where are we? Finally, at Chapter 1, Introduction, para. 1.24: "the Core Strategy will have to be reviewed in the event of a new Local Area Agreement, post-2011, setting different priorities". So what purpose does all this work serve? So we have hardly finished this exercise, before it all starts again?

Summary:

Policy ED3 Core Strategy preferred Options 2008 hinted at possible housing in Eldon Way site. June 2009 Submission version, without consultation, said Eldon Way would be housing (map included Foundry, not the text). September 2009 Submission said redevelopment would be in HAAP (which apart from the Issues/Options version, is unfinished. Judging from results of JAAP Preferred Options where biggest option is chosen, though most respondents were against it, site will be housing, without consultation.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i, iii

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Respondent: Swan Hill Homes Limited [8329]

Swan Hill Homes Limited
C/O Agent
Mr P Kneen
Charles Planning

Agent: Charles Planning Associates Ltd (Mr P Kneen) [5040]

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Full Text:

1.0 Instruction and Introduction

1.1 Charles Planning Associates Limited (Chartered Town Planners) is Instructed by Swan Hill Homes Limited (Swan Hill) to prepare and submit representations on their behalf in respect of the Rochford District Local Development Framework: Core Strategy Submission (September 2009) Development Plan Document.

1.2 The comments refer to the relevant sections and policy designations in the Submission document, as appropriate.

1.3 The comments set out in this submission are intended to assist the District Council in taking forward its Local Development Framework. It is our intention to continue to be involved in the LDF preparation process and we look forward to the opportunity to comment further at the Examination to the Core Strategy.

1.4 If you have any queries regarding the content of this submission then please do not hesitate to contact:

Peter Kneen BSc (Hons) MSc MRTPI
Planner

2.0 Housing:
Policy H1 - The Efficient Use of Land for Housing

2.1 Swan Hill recognises the importance of seeking to concentrate new developments mainly in the existing urban areas, on previously developed land where possible, particularly in view of the Government seeking to ensure 60% of all such new developments are on previously development land (PDL).

2.2 However, given the character of the District, and the strategic housing requirement of the East of England Plan, Swan Hill supports the approach that the Council must also make provision for additional development on the edge of existing settlements on greenfield sites, particularly in the most sustainable locations. As such, Swan Hill supports that where feasible, the redevelopment of existing employment sites for residential/employment purposes can make a contribution towards the strategic housing requirement, provided that sufficient additional employment land is brought forward to ensure the stability of employment levels in the District, and to ensure employment growth meets the East of England Plan requirements.

2.3 Swan Hill considers that Policy H1 should include consideration that new extensions to existing settlements have regard to their potential impact on the wider characteristics and openness objectives of the Green Belt.

Policy H2 - Extensions to Residential Envelopes and Phasing

2.4 Swan Hill generally supports the approach taken by the Council in this policy. As set out above, Swan Hill consider the Council's acknowledgment that housing requirements should be met through the allocation of land on the edge of the existing settlements is the most suitable way forward to meeting the Council's strategic housing requirement and complies with the advice in PPS3.

2.5 The need for suitable greenfield urban extensions represents the best way forward for the Council to meet its strategic housing requirement, as set out in the East of England Plan. Swan Hill supports the recognition that the potential supply of alternative previously developed sites is limited, without detrimentally affecting the character of the District, and therefore the best way forward is the use of sustainable greenfield urban extensions to the existing settlements of the District.

2.6 However, Swan Hill consider that a fundamental consideration that the District Council should consider relates to the potential impact of the urban extensions on the Green Belt policy has been somewhat overlooked. The wider sustainability credentials of the settlements of the District should only be one of many key considerations for determining the level of expansion. In view of the proximity of Southend-on-Sea to all the main settlements of the District, and the influence this has on the likely location many people would travel for employment and leisure, sustainability of many of the settlements is not a key overarching factor, and greater weight should be placed on the potential impact on the openness of the Green Belt, as this cannot be remedied if development occurs in the wrong location.

2.7 As such, Swan Hill considers that determining the location of growth for the main settlements should be to identify

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those locations where the impact on the wider setting of the Green Belt can be minimised. Further justification for those general locations chosen should be identified in Policy H2. In this regard, Swan Hill has serious concerns regarding the removal of Land South West of Great Wakering as a viable option for the growth of the settlement. The development of this area of Great Wakering, in addition to the potential redevelopment of the Star Lane Industrial Estate could provide a more comprehensive development, whilst ensuring that the wider openness of the Green Belt is maintained. Land South West of Great Wakering is significantly better placed to limit the impact on the wider Green Belt than Land West of Great Wakering, and could contribute to the provision of an important amenity and wildlife site for the local community.

2.8 In addition, Swan Hill consider that the Council now has no reserve provision in the event that any of the existing employment sites set out in Policy H1 fail to come forward for development within the envisaged timescale. Further, Land West of Great Wakering has not been identified in the SHLAA as a deliverable site to help meet the strategic housing requirement, contrary to the requirement set out in PPS3.

2.9 As such, Swan Hill would support the provision of suitable sites which could be safeguarded for future development in the likelihood of a shortfall in supply.

Policy H3 - Extensions to Residential Envelopes Post 2021

2.10 As set out above, Swan Hill supports the overall approach the Council has taken towards the provision of sustainable urban extensions as a suitable means of meeting their strategic housing requirement. However, as set out for Policy H2 above, Swan Hill has serious concerns regarding the removal of several proposed sites set out in the October 2008 Preferred Options Core Strategy, without any guarantee of the ability to deliver those sites set out in Policy H1.

2.11 As also considered above, the inclusion of West of Great Wakering for 250 dwellings should not be included ahead of South West of Great Wakering, in view of the fact that the site is not identified in the SHLAA as available, suitable and achievable as required by PPS3, and thus is not supported by a robust and creditable evidence base for its inclusion as a strategic site for development.

2.12 Whilst Swan Hill acknowledge that alterations to Policy H1 has resulted in the removal of some locations for growth in Policy H3 (as set out in the Sustainability Appraisal), Swan Hill does not consider that the most appropriate locations have been chosen.

2.13 In addition to the matters raised above, the use of West of Great Wakering would also result in the loss of valuable agricultural land, which clearly in a Green Belt location, should be less suitable for development than other sites, such as South West of Great Wakering, which would have limited impact on the wider Green Belt policy, and not result in the loss of valuable agricultural land.

2.14 Finally, in respect of Policies H1, H2 and H3, all of the above comments are based on our interpretation of the Submission Version Core Strategy when compared to the October 2008 Version of the Core Strategy. Without the ability to undertake a detailed assessment of the Council's SHLAA, it is not possible to clarify the proposed Core Strategy position regarding the proposed direction of growth proposed for the settlements in the District. As such, Swan Hill reserves the right to make additional representations regarding the proposed Policies H1, H2 and H3 following the publication of the SHLAA in due course.

Policy H4 - Affordable Housing

2.15 In general terms, Swan Hill supports the approach taken by the Council towards the provision of affordable housing for new residential developments. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H5 - Dwelling Types

2.16 Swan Hill supports the policy provision of H5, and considers that the approach taken by the Council for this policy represents a suitably flexible alternative to stipulating percentages of dwelling mix, sought by some local authorities. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H6 - Lifetime Homes

2.17 In regard to this policy, Swan Hill objects to the Council's policy where all new dwellings should be provided to the Lifetime Homes Standard. Whilst it is acknowledged that the UK has an aging population, Swan Hill considers that seeking to provide Lifetime Homes on all sites is considered to be overly onerous for proposed developers, particularly when considering the requirement for all car parking spaces to be suitable for disabled users, which could result in more schemes becoming unviable. Therefore, the provision of a percentage of Lifetime Homes should be considered through negotiations with the Council at the planning application stage, and should be determined on a case-by-case basis.

3.0 Character of Place: Policy CP1 - Design

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3.1 The Town and Country Planning (General Development Procedure) Order 1995 (As Amended) makes the submission of a Design and Access Statement for most types of planning applications a Statutory requirement, and as such, the provision of a Design Brief represents a pre-requisite of all major planning applications.

3.2 Policy CP1 seeks to ensure the provision of good, high quality developments that reflect local characteristics and distinctiveness, this ideology is supported by Swan Hill.

4.0 The Green Belt:
Policy GB1 - Green Belt Protection

4.1 Following the amendments to the wording of the Policy since the October 2008 Preferred Options Core Strategy, Swan Hill is now generally supportive of Policy GB1 and its supporting text. However, as expressed above, it is important that where alterations to the Green Belt boundary occur as a result of the extension of the settlements to meet the strategic housing requirement, both the minimal amount of land is taken and where that land is taken for development, it represents the best available land which has a minimal impact of the wider openness characteristic of the Green Belt.

5.0 Environmental Issues:
Policy ENV3 - Flood Risk

5.1 Swan Hill generally supports the approach set out in Policy ENV3 regarding ensuring development accords with the sequential test of PPS25. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV4 - Sustainable Drainage Systems (SUDS)

5.2 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV4. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV8 - On-site Renewable and Low Carbon Energy Generation

5.3 Whilst Swan Hill recognises the importance of reducing carbon emissions, particularly in new housing developments, and the role this can play in reducing the nations overall Greenhouse emissions. As such Swan Hill is generally supportive of Policy ENV8. It is noted that Policy ENG1 of the East of England Plan sets out a threshold of developments comprising 10 or more dwellings. Swan Hill consider it important for the District Council to justify the reduction in the threshold level.

5.4 Further, no assessment of Policy ENV8 has been set out in the Sustainability Appraisal which justifies the change in threshold from that of Policy ENG1 of the RSS.

Policy ENV9 - Code for Sustainable Homes

5.5 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV9. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

6.0 Community Infrastructure, Leisure and Tourism:
Policy CLT1 - Planning Obligations and Standard Charges

6.1 Swan Hill generally supports the overall approach the Council has taken in Policy CLT1. It is considered Policy CLT1 sets out a degree of flexibility to ensure that all sites are considered on a site-by-site basis, assessing the individual merits of each planning application, in order to ensure the levels of contributions applicable meet the five tests of Circular 05/05. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policies CLT5 - Open Space;
CLT7 - Play Space;
CLT8 - Youth Facilities; and,
CLT10 - Playing Pitches

6.2 Swan Hill supports the need for new residential developments to incorporate a degree of new publicly accessible open space, children's play space, youth facilities and playing pitches, and as such, generally supports the policy approaches taken by the Council.

6.3 However, it is important that whilst the Council may seek to undertake an assessment of providing standard charges for new development, which, as set out in Policy CLT1, this should be based on thorough public consultation and consideration and sound justification. Swan Hill consider that within the provision of a standard charge, it is important that such provision allows for a degree of flexibility to ensure that each site is assessed individually and on its own merits. This is particularly important for those sites close to existing open spaces and facilities. As such, the levels of

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open space and recreation facilities required in the 'standard charge' should be based on an up-to-date PPG17 Open Space assessment, which should be used to form a key consideration in the levels of provision likely to be required in the standard charge system proposed.

7.0 Transport: Policy T1 - Highways

7.1 Swan Hill supports the overall objectives set out in Policy T1 requiring developments to be located and designed to reduce the reliance on the private car and to meet the infrastructure needs generated by development or seek to help achieve these needs is acceptable in principle.

7.2 Swan Hill recognises the importance of providing sufficient infrastructure provision to meet the requirements of development, and that where developments have insufficient consideration of impact on existing infrastructure, they should be considered unacceptable and contrary to National policy guidance. However, Swan Hill considers it important to emphasise that the developer's role should not be seen as a means to meet existing shortfalls in provision.

Policy T3 - Public Transport

7.3 Swan Hill is generally supportive of the policy approach set out in T3, however, as set out in paragraph 7.2 above, it is important that the District Council do not consider that it is the developer's responsibility to resolve existing shortfalls in provision of public transport, and any contribution towards additional public transportation provision should only be to mitigate against the additional level of demand likely from the development proposed.

Policy T5 - Cycling and Walking

7.4 Swan Hill supports the general approach to this policy, as Swan Hill recognises the importance of promoting the use of alternatives to the private car. The policy provision acknowledges the need to ensure relevant contributions in the event of additional travel demands generated by individual developments, whilst also setting out additional aspirations for the cycle network in the District.

7.5 As such, Swan Hill considers this policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy T8 - Parking Standards

7.6 The Council has recently (January 2007) adopted SPD on the requirements for parking standards, and as such, Swan Hill generally supports the policy approach chosen by the Council. As set out in the SPD, whilst Swan Hill generally supports the approach taken by the District Council towards setting residential parking standards, in that the Council has recognised that in the suburban areas, even with some access to public transport, the majority of residents will rely on the use of private cars. However, Swan Hill has concerns over the failure of the District Council to comply with the provisions of PPG13: Transport (2001) which sets out that Local Planning Authorities should not set minimum standards for car parking. Whilst it is acknowledged that PPS3 sets out provision for the consideration of local circumstances, it is considered that the Council has not justified this deviation from PPG13's maximum standard.

7.7 Whilst it is acknowledged that such justification may become apparent through the work currently being undertaken by Essex County Council, until such time, the District Council should only seek to apply the maximum standards indicated in PPG13. However, Swan Hill recommends that the District Council make provisions in the wording of the Policy to allow for changes in the event that future policy on car parking standards need to reflect the County standard, following the completion of the County Council review.

8.0 Economic Development: Policies ED3 - Existing Employment Land ED4 - Future Employment Allocations

8.1 In respect of Policies ED3 and ED4, Swan Hill notes that they have changed considerably since the October 2008 Preferred Options document, in that they are site specific regarding the location of the proposed redevelopment of existing employment sites. These four sites are also identified in Policy H1 - Efficient Use of Land, and in general, Swan Hill supports the approach to the redevelopment of these sites (where feasible) based on the assessments of the sites set out in this version of the Core Strategy.

8.2 However, Swan Hill has concerns that these policies might not be considered suitably sound given that insufficient opportunity has been allocated for consultation on their redevelopment. Without the SHLAA being publically available prior to the consultation on this Core Strategy, an insufficient evidence base has been provided to corroborate that these sites are neither suitable or deliverable to meet the test of soundness requirements.

Summary:

Policies ED3 - Existing Employment Land
ED4 - Future Employment Allocations

8.1 In respect of Policies ED3 and ED4, Swan Hill notes that they have changed considerably since the October 2008

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Preferred Options document, in that they are site specific regarding the location of the proposed redevelopment of existing employment sites. These four sites are also identified in Policy H1 - Efficient Use of Land, and in general, Swan Hill supports the approach to the redevelopment of these sites (where feasible) based on the assessments of the sites set out in this version of the Core Strategy.

8.2 However, Swan Hill has concerns that these policies might not be considered suitably sound given that insufficient opportunity has been allocated for consultation on their redevelopment. Without the SHLAA being publically available prior to the consultation on this Core Strategy, an insufficient evidence base has been provided to corroborate that these sites are neither suitable or deliverable to meet the test of soundness requirements.

Change to Plan

Appear at exam? Yes Soundness Tests i

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O - 16924 - 10009 - Policy ED3 - Existing Employment Land - i

16924 Object

CHAPTER 11 Policy ED3 - Existing Employment Land

Respondent: Barratt Eastern Counties [10009]

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Full Text: Local Development Framework

Representations on the Core Strategy
Submission Document, November 2009
On behalf of Barratts Eastern Counties

Introduction

The requirements of Core Strategies are enshrined in the 2004 Planning and Compensation Act, the Town & Country Planning (Local Development) England (Regulations) 2004 and the 2008 policy guidance in PPS12. The requirements of Coe Strategies are clear. And they are legal requirements. The Core Strategy must comply with the Local Development Scheme, Statement of Community Involvement and the Regulations. The Core Strategy must be subject to a sustainability appraisal, have regard to national guidance, conform generally with the Regional Spatial Strategy and have regard to any Sustainable Community Strategy. A Core strategy must be sound - justified, effective and consistent with national policy. The following representations therefore focus on these legal requirements.

HOUSING

Paragraph 4.6 - Evidence Base

To meet the soundness test Submission Core Strategies (SCS) must be justified, that is to say it must be founded on robust and credible evidence base and comprise the most appropriate strategy when considered against reasonable alternatives. The housing strategy in as far as it identifies a need for Green belt sites is sound, however, there are other elements which are unsound.

Paragraph 4.6 notes that the Strategic Housing Land Availability Assessment (SHLAA) has examined the supply of housing. It is presumed that the Table at paragraph 4.6 is the outcome of this examination. Whilst the SHLAA has some legitimacy in that it identifies various sites that are apparently available, we are concerned that because the SHLAA was only published in November 2009 it post dates the SCS. This implies that the SCS is driving the SHLAA exercise rather than the other way round. Whilst this may have no real practical effect on the outcome of the SCS and the identified need for Green Belt sites, the Inspector will be mindful of the advice in paragraphs 33 and 54 of PPS3 that SCS draw on the evidence in SHLAA. It may be that the SCS should explain how the evidence base has been used to justify the strategy.

PPS12 explains at paragraph 4.37 that Core Strategies are based on thorough evidence. Since the SHLAA has only recently been published it is considered that the SCS is unsound as it is not justifiable. This, together with other comments on the SCS, indicates that the process should be delayed to ensure that a more robust document is placed in front of the EiP Inspector.

Table at Paragraph 4.6 - Evidence base

From our review of the available evidence it would appear that the housing land supply is insufficient and that Green Belt release are required. From the wider strategy being promoted we note that some of the sites that the District Council consider to be 'appropriate' are likely to relate to existing employment areas. As set out elsewhere in our representations, we maintain severe reservations that the redevelopment of existing employment sites for alternative uses and particularly the Eldon Way Industrial Estate is unsustainable. We will make reference to the effectiveness of this strategy in relation to sustainability, whether it is justified in the context of National Policy and the deliverability of such a strategy elsewhere.

In particular, paragraph 11.32 of the SCS refers to existing employment land and sites within the UCS. It does not refer the SHLAA and as such it appears that an evidence base to support the re-use of employment land for residential is not reported in the SCS.

Having reviewed the 2008 Annual Monitoring Report, as we did when commenting on the 2008 Preferred Options Core Strategy, we maintain severe doubts as to the appropriateness of some of the previously developed sites identified as potential housing sites and their expected housing yield. Whilst we cannot at this stage ascertain whether the SHLAA

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sites referred to in this table correlate with the Annual Monitoring Report and indeed the 2007 Urban Capacity Study, it is our view that there will be some commonality and so the reliance on these sites is likely to be at odds with Government Policy. We shall elaborate on this objection in relation to the specific housing policy below.

We note that the last two rows in the Table at paragraph 4.6 set out figures with and without Green Belt releases. The text to this section of the Core Strategy should, for reasons of clarity, explain that Green belt review will be necessary in order to deliver the required housing.

Paragraph 4.9

The table on page 40, which sets out the settlement tiers, is supported. Rayleigh, Rochford/Ashingdon, Hockley/Hawkwell are clearly the largest settlements in the District and they benefit from good employment, housing, leisure, community and public transport provision. These settlements are the most sustainable ones with the greatest mix of uses. Consequently, it is sensible that the Core Strategy identifies these as top tier settlements and is able to target them with growth accordingly. This component of the strategy is justified by reference to sustainability data and is effective, since targeting development at these locations will ensure a more sustainable pattern of development.

Paragraph 4.14

We maintain that the strategy for redeveloping the Eldon Way Industrial Estate for housing and other alternative uses to employment is unsound. It is neither justified nor effective. The Industrial Land Availability Study 2006 sets out on page 7 strategic objectives. The 3rd objective seeks to Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive. Clearly the strategy as currently drafted envisages major changes to existing industrial estates, including alternative uses. This strategy is not consistent with other strategies and evidence based studies and so cannot be justified in the context of the tests set out in PPS12. It is also an ineffective strategy since the new employment locations that would free up the Eldon Way site for redevelopment relies on transport infrastructure that has no certainty of being delivered. Principally, the erosion of employment uses at Eldon Way could make the settlement of Hockley/Hawkwell less sustainable and thus conflict with the tiered approach on page 40, paragraph 4.9.

Policy H1

Prioritising the use of previously developed land ("pdl") is supported in principle. It is a justified strategy in the context of PPS3 and effective as sequential choices can be made by implementing the policy. However, the District Council is also promoting a strategy which seeks the redevelopment of existing employment locations to alternative uses and by consequence is identifying green field sites for new employment development elsewhere (Policy ED4 refers). This 'land swapping' is not considered consistent with PPS3, nor is it considered to be justified or effective in delivering the desired strategy. This is particularly the case as most of the existing employment sites are occupied and therefore unavailable for redevelopment. In addition, the new Greenfield sites are in an arguably less sustainable locations away from the top tier settlements identified on page 40 of the Submission Core Strategy. Clearly this element of the strategy is inconsistent with the wider strategy.

The Industrial Land Availability Study 2006 is included as an evidence base by the District Council. It includes an introductory section, which explains that the authority wishes to make Rochford the place of choice for new business. It includes several strategic objectives on page 7 including "Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive." It reviews existing employment areas and identifies vacant land, including land available from allocations. It does not include any assessment of new sites or potential opportunities for new sites that might have been expected to feed into the Core Strategy. The strategy for identifying Green Belt site employment allocation does not appear to be based on any evidence in this document and in that context cannot be justified. The strategy being promoted potentially conflicts with Government policy in PPG13, PPG2 and emerging PPS4.

The Employment Land Study 2008 is a much later document. It has a key recommendation on page ii "we recommend that Rochford District Council adopts strong policies to protect existing employment land." Furthermore under recommendations for existing sites on page iii-iv of that document it states "In our view, Hockley Trading Centre is a strategically well placed employment location. However, we recognise the ambitions of the Hockley Town Centre masterplan and that within this the Council should consider it to be allocated for other uses. However, we recommend that this reallocation happen only if provision is made within the masterplan for office use within Hockley Town Centre as part of a mixed use scheme." The view of the writers of this document is clear - the Eldon Way Industrial estate (Hockley Trading Centre) is a good employment site and that it is for other reasons that alternative uses are being considered and only then if office development is supported. This supports our representations that new future uses at the Eldon Way site should be employment dominated and that alternative uses should relate to the objectives of the Town Centre which is to enhance the shopping and leisure facilities. Residential is not an appropriate alternative.

This document recommends the use of land to the west of Rayleigh for employment and envisages Green belt release. However, the SCS does not explain through the evidence base why existing employment sites should be 'deallocated' and Green belt land unnecessarily used.

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In addition to these key issues we have some specific concerns. As a consequence we maintain an objection to the second paragraph of Policy H1. This policy states that the Council will seek the redevelopment of various industrial estates including Eldon Way. The Policy says that alternative uses will be sought (presumably alternative to the existing employment offer) and that new land will be allocated elsewhere. This policy statement, in relation to Eldon Way in particular, is unsound for a number of reasons:

The emerging Hockley Area Action Plan consulted upon in 2008 states that the Eldon Way Industrial Estate is strategically well placed. In a sense this statement underplays the true importance of this highly sustainable employment location and only major employment area in Hockley/Hawkwell. The employment area is adjacent to the railway station and located a short distance from the main bus routes that run along Spa Road. Some of the residential areas of the town are also within walking distance of this commercial area, thus providing a potential for sustainable travel by employees. The Eldon Way Industrial Estate is therefore right at the heart of the settlement of Hockley/Hawkwell and provides an opportunity to meet sustainable transport objectives by reducing the need to travel by car. Consequently, this employment area should be highlighted as a premier employment site in sustainability terms, both in the context of PPG13, PPG4 and PPS6. To encourage alternative uses as set out in Policy H1 implies the removal of the majority of employment based activity at Hockley/Hawkwell and this would be contrary to National policy, would not be the most appropriate strategy when considered against alternatives and is therefore unsound.

Whilst it is acknowledged that improvement to the Eldon Way Industrial Estate can and should take place, the extent to which the mix of employment uses should be altered in favour of alternative land uses requires careful consideration. It is our view that a mix of existing or indeed new employment land uses with some Town Centre type uses should dominate the Eldon Way site. A mix of employment types between offices, light industry and other high technology industries should be encouraged as this will provide many locational advantages to the firms that agglomerate together. The Council says that the existing uses on this site are harmful to amenity. However, the site has operated for many years without any significant issues and if renewal for B1 type uses are encouraged then the employment area can be maintained without harm to amenity. Renewal of the employment stock can help develop and improve trade, improve the sustainability of businesses as a whole and make for a more flexible labour market as skill levels are varied. A singularly different use altogether or a variety of uses which excludes employment could undermine the long term sustainability of the area and Town Centre. As such Policy H1 is not an effective strategy and should be amended to acknowledge the importance of Eldon Way and the need to renew the employment stock to ensure that the site maintains its important role as a employment site, albeit with some ancillary alternative use development where appropriate.

The 2008 Retail Study notes that Hockley Town Centre is not strong and there is trade leakage. Eldon Way Industrial Estate provides a customer base for existing town centre uses. Weekday spending within town centres is an important contributor to the viability of many retail and leisure businesses either through expenditure by employees during the lunchtime trade or expenditure by employers, on necessary goods and services. This relationship helps sustain the critical mass of a centre and provides a platform for new retail and leisure growth. It is important to have a balanced centre with a variety of uses. Policy H1, as currently drafted, implies the removal of employment related development and this is likely to harm the vitality and viability of Hockley Town Centre. The Council has presented no evidence to suggest that this is not the case. Importantly, the 2008 Retail Study explains that there is a need for additional retail and office space. In principle we would support additional office and other B1 type uses plus retail but employment uses should always dominate for the sustainability reasons given above. Retail and office development are likely to present a viable alternative to some of the more industrial type uses.

Consequently, we do not support the phrasing of the third paragraph of Policy H1 and maintain that the most appropriate strategy is to seek renewal of the employment stock with employment based uses and with some new retail development. Removal of employment land uses completely as currently implied-which was the approach adopted in the emerging Hockley Area Action Plan - is not a justifiable strategy.

One of the key tests of a Core Strategy is consistency between policies in the emerging Plan and this strikes at the heart of demonstrating an effective strategy. Policy H1 implies alternative uses to employment and the relocation of Eldon Way to a site identified under Policy ED4. However, Policy RTC6 sets out a suite of policy criteria for Hockley Town Centre which includes employment and commercial activities. In addition Policy ED3 seeks the protection of sustainable employment sites (Eldon Way) and notes that some reallocation of existing employment sites will include a proportion of employment. It notes that in the case of Eldon Way employment development will form a component. The policies appear at odds with one another. The third paragraph of Policy H1 should be deleted as the second paragraph is sufficient to set a strategic context for delivering new housing development. The employment policies and Hockley specific policies should be left to consider the type and quantum of land uses appropriate in the area. If the third paragraph of H1 is to be retained then it should tie in more with Policy RTC6 and in our view explain that employment uses should dominate any redevelopment proposals for the Eldon Way site and that retail and leisure uses should be a supporting proportion.

Implementation, Monitoring and Delivery - page 132 onwards

One of the key tests of soundness is that the Core Strategy should be effective - it should be able to deliver its strategy. The Implementation strategy set out at page 132 onwards of the Core Strategy does not explain how Policy H1, RTC6 and the strategy for redeveloping Eldon Way (Policy ED2 and ED3) will be delivered. The comment at Policy ED3 on

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page 161 identifies it as a potential risk and alludes to land assembly difficulties and the choices to be made by owner/occupiers. In order to deliver the strategy there should be a clear understanding as to whether the new land use values being promoted are sufficient to encourage relocation voluntarily. Secondly there is a need for more information to be gathered and presented to show that current occupiers and landowners are willing to relocate and the timescales likely for this. For example, do the building lease contracts enable early review or are there any break out clauses. There should be some commentary on whether the Council will engage in compulsory purchase orders to pursue their strategy should the 'encouragement' route fail. As currently drafted there is no clear path to deliver the strategy and the danger is that despite reallocation, the sites identified for redevelopment will not come forward in the plan period. In this regard, evidence to satisfy the test of soundness is not provided.

Policy H2 - General Locations

We support the strategy that new housing growth should be targeted at land South of Hawkwell. This area is suitably located to the urban area of Hockley/Hawkwell and to tie in with the settlement tiers on page 40 of the Submission Core Strategy the same terminology for settlement should be used. This ensures a consistency within the SCS. The choice of this location as a housing growth area is appropriate as it would not contribute to the coalescence of the urban area with Ashingdon (there is existing development between this identified housing area at Rectory Road and Ashingdon and moreover, Rectory Road can form a natural physical boundary for the new Green belt boundary. This area is also well located to the existing road network. Cherry Orchard Way has recently been improved and provides much better accessibility to the proposed housing growth area than any other location around Hockley/Hawkwell. The existing bus routes along Rectory Road also make this location sustainable and the additional housing proposed will help underpin the financial viability of bus routes in this area. Locally there are employment opportunities, including the small commercial estate off Main Road. The Eldon Way Industrial Estate adjacent to the Town Centre also provides the opportunity for employment locally. Extensive public open space, play pitches and built leisure facilities are located just to the north of this area and a community hall is located off Briar Close, nearby. The area to the south of Hockley/Hawkwell is close to local shops on the corner of Heycroft Road and Main Road and there are numerous footpath links between this area and the local community including links via Thorpe Road, Thorpe Close, Briar Close, Hawkwell Park and Park Gardens. The area therefore provides the opportunity to enhance existing links, including cycle links, and contribute towards community integration - more so than other sites on the south side of this settlement. The site is also in the control of one house builder and deliverable.

However, we find that the Policy is not fully consistent with national policy and furthermore needs to be reviewed in order to be justified and effective. We have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with this policy and feel that Green Belt review should be more explicit throughout the SCS. We note that it is only Policy H3 which indicates the need for Green Belt land review. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H2 and certainly Policy H3 and Policy GB1 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary.

Policy H2 - Phasing and Quantum

The 2008 Preferred Core Strategy document indicated that the area south of Hawkwell should deliver 330 dwellings over a phasing period to post 2021 (see Policy H2 and H3 of that document). The SCS reduces the quantum of housing in this area to 175 but expects delivery by 2015. At a broader level the Preferred Options Core Strategy of 2008, (Policy H2) required 1,450 dwellings to 2015 and a further 1,050 by 2021. In the SCS the figures are now 775 and 1,010 respectively.

Since the SHLAA post dates the publication of the SCS, we are uncertain as to the reason why such a significant reduction in quantum of housing and extensions to the residential envelope is considered necessary. Presumably it is the 'new' strategy to redevelop existing employment areas within the settlements that has led to this change. Our representations on this strategy and specifically the Eldon Way Industrial Estate are included elsewhere within our representations. Previously we have commented on the Table at paragraph 4.6 of the Submission Core Strategy and the lack of evidence to underpin that table. It seems odd that in the space of a year the expected requirement for Greenfield sites has effectively halved on the basis of a SHLAA exercise. The community is therefore not able to effectively

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comment on the housing land supply and at this stage the Submission Core Strategy is legally unsound.

That said, we are of the view that the quantum of housing envisaged south of Hockley/Hawkwell should be more than the 175 currently envisage. In coming to this view we have reviewed the Urban Capacity Study and the latest housing figures in the Annual Monitoring Report 2008. We conclude that the shortfall in housing land supply is such that 330 dwellings in this location is appropriate.

The recently published SHLAA is based upon the data obtained from the Urban Capacity Study 2007, a call for sites exercise and data from the Annual Monitoring Report 2008.

The 2007 Urban Capacity Study (UCS)

1. 2007 is widely recognised as being the peak level of house prices in the UK and it was acknowledged by Government and practitioners alike that 2007 house prices were at an unsustainable level. It is our view that utilising the 2007 UCS as an evidence base without reference to the market does not pick up the depressed demand that is likely to now exist. Recent corrections to the housing market now mean that housing land prices are at a much lower and arguably more affordable level than before. The implications are that some pdl may not be viable for housing development. Often brownfield sites have much higher development costs than Greenfield sites and so the yield from urban capacity will be much lower than anticipated in the 2007 study. One example is the employment allocation of the Adopted Local Plan located at 76-92 Main Road, Hawkwell. This site has been allocated for several years and has been available during the most recent rises in residential property prices during 2006-07. As a consequence the lack of progress on the site can only be described by its current occupancy and perhaps it comprises high value uses that do not encourage redevelopment. Despite this the site is identified as having high potential for alternative use and high potential demand. The SHLAA form notes that there is no information on legal constraints (e.g., tenancy agreements) As a consequence it is difficult to see how this could continue to be a potential site and as a consequence the allowance for green field releases should be increased.

2. There are considered to be other instances in the UCS and the recently published SHLAA where the assumptions and calculations would indicate that the 1301 urban capacity figure is over optimistic and the SHLAA assessment is limited. In the assessment of 'non-residential sites in appropriate locations' within the UCS assumptions are made as to the probability of sites coming forward for new housing. 68-72 West Street, Rochford is identified as a high probability site but we note that it has been subject to 7 refusals of planning permission/conservation consent. There is a significant gap between the urban capacity identified as being suitable by the Council and the capacity applied for by the owners. Given its alternate use value, it is debateable whether the two capacity figures can be reconciled. No 247 London Road is another example of a site allocated in the Local Plan but which hasn't come forward. This is now the subject of a proposal for a care home and if approved would further limit the scope for market/affordable housing capacity on the site. A striking example of how the urban capacity study has underestimated is also evidence by 2-4 Alderman's Hill, Hockley - described as a disused service station. There has been no residential development application on this site since 2004 and most recent applications have sought commercial use of the site. Rather than being evidence of housing land deliverability, this particular site evidences the need for commercial uses in the area. There are therefore deliverability doubts over these 'high probability' categories which amount to some 40 units.

3. In relation to the assessment in the UCS entitled 'intensification of existing residential uses' we note that the assessment is premised on an assessment of recent trends taking into account net completions between 2001-2006 and 2005-06. This is effectively an assessment of windfall trends and not an approach that PPS3 encourages. Importantly Table 3-12 in the urban capacity study seeks to project forward urban capacity from residential redevelopment - a period that benefited from high house prices and PPG3 guidance encouraging redevelopment. These two circumstances have markedly changed and so the assumptions and conclusions drawn would also have changed. Even taking into account the UCS discounting, the reliability of the 404 units from this source must be questioned and in our view the 1301 figure cannot be a sound basis for urban capacity and further Greenfield releases are necessary.

4. In the section of the UCS entitled 'subdivision of dwellings' and 'living above the shop' it is estimated that recent trends would result in 7 and 15 units. Our concerns with using trends as a basis for urban capacity are detailed above - PPS3 does not encourage this. Rather, local authorities are charged with surveying their areas, identifying which areas may yield urban capacity and how much and developing policies to achieve that. Government guidance does not encourage the estimation of windfalls in the way the UCS does.

5. Redevelopment of established employment land is a separate section within the UCS. At 1 above we identify the low probability of the Main Road residential allocation coming forward. This remaining section of the UCS considers 11 further employment sites which were first identified in the 2000 UCS. Three of these are considered to have a high probability of coming forward. We have looked at these three sites and can find no evidence that they are likely to come forward. In the 8 years between 2000 and 2008 the three identified high probability employment sites have not been developed and there is no reason to assume that the next 5-10 years will be any different. For example the Rawreth Industrial Estate is identified as being well used in the UCS and although it has some unneighbourly uses there is no indication that the site is available, suitable or deliverable for residential. Land between 39-69 Lower Lambricks, Rayleigh is identified as having a high probability of residential uses. Yet there is no

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evidence of any pre-application advice or planning applications for this area. Stambridge Mills, Mill Lane, Stambridge is a further example. This site is separated from the urban area, in a flood risk zone and protected in the 2006 Replacement Local Plan by Policy EB9 which promotes B1 uses. Against this background there is only two relevant planning applications affecting this area both date from the early 1990's and relate to a plant room and loading bay. There is no evidence that this is likely to come forward for residential purposes in the next 5-10 years.

6. In the UCS extant permissions are identified as 856 dwellings. It is important to note that this figure needs to be continually reassessed so that from the point of adoption of the Core Strategy a 5 and 10 year housing land supply is available. The SHLAA notes extant permissions for 2009-14 being 106. As noted below extant permissions do not necessarily translate into deliverable sites. There is therefore a contingency that needs to be built in. Further allocations on greenfield land need to be increased and as such the quantum of housing in the area south of Hockley/Hawkwell should be increased to 330 dwellings in order to begin to meet the shortfall identified.

The District Council's 5 year housing supply assessment

7. The District Council's Annual Monitoring Report ("AMR") 2008 purports to demonstrate a 5 year housing land supply. The preamble to Table 4.10 in the AMR 2008 explains that Rochford District Council ("RDC") has included units under construction, units with full permission, units with outline permission, units with a resolution to grant, units subject to preapplication discussion/Urban Capacity Assessment and land allocations in its trajectory. The reader is referred to Appendix B which breaks down the sites in more detail. The recently published SHLAA also includes a table showing a potential 1273 dwellings deliverable. However, it refers to "appropriate brownfield sites." Since these 'appropriate sites' are do not benefit from an application or a planning permission it is difficult to programme them into the housing delivery trajectory.

8. In the full planning permission category of the AMR 2008 where work has not yet started there can be no guarantee that all these sites will be delivered in the 5 years. This comment relates to the one above in relation to the recently published SHLAA. It is not uncommon for permissions to be obtained to provide a means for valuing a site where the owner has no immediate plans to sell the site or develop housing. Delivery may also be hampered by funding constraints, or site assembly problems (where sites are in an alternative use or relocation constraints). Appendix B of the AMR 2008 does not set out the intentions of the landowner or whether the sites are truly achievable in the 5 year period as per PPS3 requirements. The SHLAA purports to show developer intentions at Appendix C but the assessment by the local authority into the legitimacy of some of the claims is not presented. The evidence base is not as full as it should be to demonstrate the robustness of Table 4.6 of the SCS. It is also unclear the extent to which this table is based on either the UCS 2007, AMR 2008, SHLAA 2009 or a combination of all three. This should be set out clearly.

9. In addition, to the 'non delivery' of a proportion of new homes in the AMR 2008, there is concern at the timings of delivery in that data set, for example, 10 units in 2008-2009 relates to outline planning permissions and it is doubtful whether reserved matters can be turned round quick enough to begin delivering housing in this year period. There could well be examples in that set of data where the delivery of units in the first year of the 5 is unlikely, thus delivery is reduced for that period and pushed back and this process is then compounded throughout the data set up to and beyond year 5. Statistical evidence from the Department of Communities and Local Government ("CLG") reveals that building starts are 43% down on the quarter to March 2009 compared with March 2008. It is not clear whether the recently published SHLAA has taken this into account and unless it does the data in the Table at 4.6 of the SCS cannot be relied upon, particularly given the current recessionary circumstances. In relation to the Table at Paragraph 4.6 a refinement is therefore needed to take into account this effect on phasing.

10. This problem is compounded for other units relied upon where permission has been granted but no start on site has been made; this accounts for a considerable number of sites in 2009-10 period (100 dwellings) which is (year 2 of the 5 year period). A delay in these will require more Greenfield sites to be identified in order to meet the shortfall.

11. Finally we note that the East of England Plan expresses its land supply requirement as a minimum. This strategy is not reflected in the

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Submission version of the Core Strategy policy H2.

12. In summary since neither the UCS nor the Annual Monitoring Report form a SHLAA, reservations are maintained about the degree to which sufficient housing land has been identified.

Policy H3

In the Preferred Options Core Strategy 2008 more locations were identified for housing growth in the post 2021 phase. Whilst it is our view that land south of Hockley/Hawkwell should benefit from a greater number of dwellings than the 175 currently identified (330) in order to make the strategy effective. We are concerned at the significant change in strategy between the Preferred Option Core Strategy and the Submission version, which has significantly less housing growth on green field sites. This change in strategy is so significant that we would question whether it is appropriate in the context of soundness and the consultation processes that have taken place so far.

We also have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with other policies in the SCS and feel that Green Belt review should be more explicit throughout the SCS. As it currently stands there is a potential conflict with national policies and limited justification for the Green belt strategy. We note that in Policy H3, which indicates the need for Green Belt land review, the advice is limited and unclear. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H3 and Policy GB1/H2 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary. Not to do so is unsound for justification and effectiveness reasons.

Policy H4 - Affordable Housing

As currently drafted we feel that the policy is not concise enough and that the policy does not reflect current guidance. The phrase 'at least' would indicate that in most cases affordable housing above 35% will be sought. Our understanding is that the 35% figure is recommended in the SHMA and that to provide a policy framework which seeks to go beyond that figure would potentially be unworkable as many sites could not financially bare the burden of over a third of the net developable area not yielding a value. The policy should be redrafted so that "a target of 35% affordable housing shall be provided on all developments of 15 or more units..."

The last policy paragraph provides some scope to relax this policy, if there are clear site constraints that make on site provision impossible. The policy, though, is not particularly clear on what would constitute exceptional circumstances. For example, physical site constraints, which unusually raise development costs, would be one such reason and this should be specified. There may be other reasons including the nature of housing needs in the part of the District the site is located which justify affordable housing below the 35% target. Design reasons may also have a bearing on how provision is made and in what form, particularly if the site is in an historic area where design might override housing need argument. It is therefore recommended that the policy expand on the type of circumstances where affordable housing may be relaxed and the type of information that will be sought of applicant's who have a need to invoke this part of the policy.

Policy H5

In support of the policy, it is advantageous that no percentages requiring a specific mix are included. This flexibility will enable developers and the Council to respond directly to changing circumstances in the local housing market. In the past some authorities have set out a percentage for the type of housing they require only to find that after a few years of strict implementation there is an oversupply of property of that type and no flexibility in the policy to address the problem.

Policy ED2 - London Southend Airport

It is considered that to grow non aviation related employment at a location north of Southend Airport where sustainable access from the rest of Rochford District requires careful consideration. Most Airports are serviced by aviation related employment development and as such a location close to the airport is sensible and sustainable. However, for surface access reasons it would be inappropriate to encourage travel from Rochford's main settlements to what essentially

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would be a rural location for general employment uses. Whilst sustainable access would be improved by a railway station and better bus links, there is no evidence to suggest that a sustainable surface access strategy for non related employment development at the Airport can be achieved. Paragraph 11.22 explains the critical importance of a railway station to the delivery of the strategy yet the Transport Chapter and Implementation Chapter provide neither a policy nor an assessment of deliverability. It is also notable that the South Essex Rapid Transit Policy T4, as set out at paragraph 10.16, notes that Rochford is not proposed to be served but may be served in future phases. This uncertainty is no way to plan for a major employment land supply strategy in the District. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley/Hawkwell, Rochford and Rayleigh is unsound.

Policy ED3

We fully support the first sentence of the Policy and note the apparent contradiction with the statements in Policy H1 and elsewhere which seeks to develop on alternative uses at industrial estates such as Eldon Way.

This contradiction is evidence in the second paragraph of Policy ED3. In our representations on Policy H1 we have explained why it is not sound to diminish the employment stock at Eldon Way and the importance of maintaining a dominance of employment type uses at this estate. These arguments are not repeated here.

We note the sentiments of the third paragraph and in accordance with our representations elsewhere are of the view that this sentence should be revised to explain that Eldon Way will accommodate principally employment type uses. As noted elsewhere uses which are an alternative to employment would diminish this highly sustainable employment site and this is unsound when assessed against National Policy.

Policy ED4 - Future Employment Allocations

In part, the de-allocation strategy is not supported as it is considered unsound when set against sustainability criteria. In relation to the Eldon Way Industrial Estate it is considered critical to the ongoing sustainability of this settlement that employment uses are maintained at this location. It is close to the railway station, bus routes and local residential areas from which the opportunity exists for employees to walk or cycle to work. Its location adjacent to the Town Centre offers opportunity for some retail and leisure development to complement the centre and to maintain a supporting function. These sustainable benefits would not occur with the deallocation of Eldon Way or the significant erosion of its employment floorspace. Whilst redevelopment of the employment site to achieve new employment is supported, the dominant land use should continue to be employment use. As a consequence, the 18ha of land required for employment in this policy is considered to be excessive and the policy should be reviewed to explain that redevelopment of existing employment sites for primarily new employment development will be encouraged.

Policy T4

It is noted that the South Essex Rapid Transit policy, as elaborated upon at paragraph 10.16 notes that Rochford is not served but may be served in future phases. This uncertainty is contrary to the delivery principles of soundness and directly puts at issue the employment land supply strategy in the District which is founded on sustainable access to new sites. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley, Rochford and Rayleigh is unsound.

Appendix H1, CTL1 - Infrastructure

It is recognised that necessary infrastructure provision is an important part of creating a sustainable development and in that context appendix H1 is supported. The supporting text notes that the table at Appendix H1 is not exhaustive and in that context it is very important that the framework properly distinguishes between what should be provided as part of new development schemes and what shouldn't. It is therefore essential that the framework acknowledges the importance of Circular 05/05 and the tests which say that provision of infrastructure and/or contributions should be:

- * Relevant to planning
- * Necessary to make the proposed development acceptable in planning terms
- * Directly related to the proposed development
- * Fairly and reasonably related in scale and kind to the proposed development
- * Reasonable in all other respects

As is made clear (Paragraph B9 of Circular 5/05) contributions should not be used to make good existing deficiencies in infrastructure provision. Nor are they to be used to secure contributions to the achievement of wider planning objectives that are not necessary for consent to be granted. In that context the Core Strategy should set this out as its policy framework.

Policy GB1 - Green Belt

Core Strategy Submission Document

16924 Object

CHAPTER 11 Policy ED3 - Existing Employment Land

The objectives of this policy are supported, although as noted in other representations the SCS is unsound as it does not meet the tests in relation to justification, compliance with national policy or effectiveness of strategy.

Policy GB1 mentions the objective to allocate the minimum amount of Green Belt land necessary. The policy should link to the requirements of PPG2 and RSS which are discussed in relation to the representations on Policy H2 and H3. The policy should set out a timeframe for the review and why Rochford requires a Green Belt review (what the exceptional circumstances are in this District that justify a review of local boundaries. The policy should be amended to set out a 2031 time frame and this may require the SCS to have an extended life span beyond 2021.

We would recommend the deletion of the word character since Green Belt designation is not related to landscape character as currently drafted. For clarity we would also recommend that the Policy or its supporting text explain that a Green Belt review will take place in support of an allocations document (paragraph 6.6) in order to identify an appropriate new boundary. This is particularly necessary given the commitment to a Green belt review in the adopted Local Development Scheme.

Policy CLT1 - Planning Obligations and Standard Charges

In view of the need to test fully the basis on which standard charges are based it is important that any document produced is in a development plan document that enables an examination in public. The policy should explain this in order that when the document is produced it accords with Policy and is based on sound evidence.

ENV9 - Code for Sustainable Homes

Object. The advice from the Department of Communities and Local Government is that the new requirement to have a rating against the Code does not make it mandatory to build a Code home or to have each new home assessed against the Code. It does however mean that all buyers of new homes be given clear information about the sustainability of the new home. A house builder can do this in one of two ways:

- they can choose to build a Code home, have that home assessed against the Code and provide the home buyer with a Code certificate stating the star rating the home has achieved
- or, they can choose to build to current building regulations standards, not to pay for an assessment and instead download a nil-rated certificate of non-assessment (also referred to as a nil-rating) to provide to the home buyer.

As such the Rochford policy requirement that coding 3 be achieved by 2010 and Code 6 by 2013 is out of step with Government advice. The policy wording should explain that it is just the coding that is a requirement of new homes and not necessarily that new homes should be constructed to achieve a standard.

The current Government objectives are for the code to be introduced over a reasonable period with development to be code 3 by 2010, code level 4 by 2013 and code level 5 by 2016. In this regard the policy, as drafted, seeks to achieve code 6 by 2013 and consequently compresses the code requirements into a shorter time scale with the costs associated expected to be subsumed within the housing market through higher prices. This is not a realistic strategy for the delivery of sustainable homes and we consider that the policy should be revised to extend the period of compliance but to also make it more flexible based on local circumstances.

Research undertaken on behalf of the Housing Corporation and English Partnerships, published in February 2007 'A cost review of the code for sustainable homes' reveals that code 6 is unlikely to be unattainable given existing technologies and that achieving code 5 could result in a 12% to 20% increase in costs that would have to be passed onto the consumer. Given the variability of the housing market with peaks and troughs, it is unlikely that the housing market would be able to subsume this level of price increase.

The code system policy as currently drafted does not have regard to site circumstances and so many of the requirements could be difficult to meet. For example, micro electricity generation on site may be difficult to achieve where local circumstances deter the capture of wind or solar power. If more expensive technologies are required to generate power than is the norm then costs will rise. There may be other competing reasons why designs cannot include certain sustainability measures if housing sites are in sensitive landscape and historic locations. Alternatively there may be significant development costs associated with site specific circumstances and so viability of the site's development becomes a valid consideration. By insisting on the code for sustainable homes other policy objectives such as affordable housing at particular rates and other contributions may need to be reconsidered. Consequently, we are of the view that this policy should be drafted in a manner which enables site specific circumstances to be taken into account. As noted above the Government explains that the code is a certification requirement and does not necessarily mean that buildings are constructed in accordance with a code level.

It is also important to note that it is not the purpose of planning legislation to duplicate other legislation. In this regard, the policy should accept that the Building Regulations will be the main vehicle for implementing this policy and that unless the coding requires external development then there will be no need to specify what is to be carried out in a planning application.

Core Strategy Submission Document

O - 16924 - 10009 - Policy ED3 - Existing Employment Land - i

16924 Object

CHAPTER 11 Policy ED3 - Existing Employment Land

Summary: Policy ED3

We fully support the first sentence of the Policy and note the apparent contradiction with the statements in Policy H1 and elsewhere which seeks to develop on alternative uses at industrial estates such as Eldon Way.

This contradiction is evidence in the second paragraph of Policy ED3. In our representations on Policy H1 we have explained why it is not sound to diminish the employment stock at Eldon Way and the importance of maintaining a dominance of employment type uses at this estate. These arguments are not repeated here.

We note the sentiments of the third paragraph and in accordance with our representations elsewhere are of the view that this sentence should be revised to explain that Eldon Way will accommodate principally employment type uses. As noted elsewhere uses which are an alternative to employment would diminish this highly sustainable employment site and this is unsound when assessed against National Policy.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 15950 - 9936 - Policy ED4 - Future Employment Allocations - i, ii, iii

15950 Object

CHAPTER 11 Policy ED4 - Future Employment Allocations

Respondent: Mr David Grew [9936]

PO Box 2091
Hockley
Essex
SS5 4WR
UK
07740201389

Agent: Mr David Grew [9936]

PO Box 2091
Hockley
Essex
SS5 4WR
UK
07740201389

Full Text: Agree with locating employment land in certain locations west of Rayleigh and south of London Road. However policy is not specific enough. Much of the Green Belt land south of London Road is visually sensitive public open space and good quality farm land. There would be implications for wildlife, should this part be developed.

PPG4 promotes employment land development in locations well served by rail freight.

Summary: Agree with locating employment land in certain locations west of Rayleigh and south of London Road. However policy is not specific enough. Much of the Green Belt land south of London Road is visually sensitive public open space and good quality farm land. There would be implications for wildlife, should this part be developed.

PPG4 promotes employment land development in locations well served by rail freight.

Change to Plan As many uses relocated from Rawreth Industrial Estate would not be neighbour friendly ie heavier industrial uses, the new employment land would be best located south of the railway line and close to the A127, A129 and A130. This location would be less visually intrusive, have less impact on wildlife, residential areas and be close to main roads which would reduce HGV traffic within the district. It would also be very convenient for any future railway links in line with the aims of PPG4.

Appear at exam? No

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 16079 - 9599 - Policy ED4 - Future Employment Allocations - i

16079 Object

CHAPTER 11 Policy ED4 - Future Employment Allocations

Respondent: Mrs Fiona Jury [9599]

WGDP Ltd
Cross Keys House
22 Queen Street
Salisbury
SP1 3EY

Agent: N/A

Full Text: The approach to the de-allocation of existing employment sites and identification of new employment allocations is unsound. The existing employment sites, with the exception of Stambridge Mills, are occupied. The future employment allocations will inevitably involve a Green Belt release, and this would be counter-productive to the overall strategy.

Summary: The approach to the de-allocation of existing employment sites and identification of new employment allocations is unsound. The existing employment sites, with the exception of Stambridge Mills, are occupied. The future employment allocations will inevitably involve a Green Belt release, and this would be counter-productive to the overall strategy.

Change to Plan The existing employment sites proposed for re-allocation comprise businesses that are well established and have good occupancy levels. The proposal to identify future employment sites on Green Belt land has not been founded on a robust evidence base. The existing employment sites proposed for housing should be upgraded, alongside the proposal to encourage employment growth allied with London Southend Airport.

Appear at exam? Yes

Soundness Tests i

Core Strategy Submission Document

16127 Object

CHAPTER 11 Policy ED4 - Future Employment Allocations

Respondent: A & E Pinkerton [14162]

A & E Pinkerton
Lubards Lodge Farm
Hullbridge Road
Rayleigh
Essex

SS6 9QG

Agent: Whirledge & Nott (Ms K Jennings) [5094]

Whirledge & Nott
The Black Barn
Lubards Lodge Farm
Hullbridge Road
Rayleigh
Essex

SS6 9QG

Full Text: We object to the allocation of green field sites for employment when existing employment sites can be improved to meet the employment allocation.

Lubards Farm is an established employment area which also provides a variety of community based uses. The site extends to 3.5 hectares of existing employment land and it is considered that this area can be redeveloped to create a more sustainable employment area with further allocation on the adjacent land. The site has attractive farmland surroundings which will enhance a high quality office and business premises development.

The site is a similar distance from Rayleigh rail station as the proposed site at West of Rayleigh and has good public transport links with the rail station. The site is only a short distance from the A130 junction at Rettendon and from the A127 Junction. The site is also closer to the settlements of Rayleigh and Hullbridge and again is already well linked by public transport. It is considered that this site would be preferable to sites on the very western edge of the District.

The site is closer to Rawreth Lane Industrial Estate so businesses will not be displaced any significant distance. The layout of the existing site at Lubards Lodge Farm, through allocation in this strategy, can be improved to consolidate and improve the wider range of employment and community uses.

It is considered that this site offers more potential with less loss of greenfield Green Belt land than the proposed site at West of Rayleigh and therefore the allocation of land West of Rayleigh is unsound.

We would wish to see Land West of Rayleigh replaced by the site at Lubards Lodge Farm

Summary:

We object to this policy as it seeks to relocate employment land onto green field sites when there are existing employment areas already developed which can be allocated. Employment land can be developed at Lubards Lodge Farm which is already an established employment centre with a significantly developed footprint. The location of the site is between the settlements of Hullbridge & Rayleigh so is very accessible to residential areas and benefits from good public transport provision already existing. The location close to Rawreth Industrial Estate means business will not be displaced any significant distance.

Change to Plan

We would wish to see the allocation of land West of Rayleigh deleted and Land at Lubards Lodge Farm, Hullbridge Road, Rayleigh inserted to replace it in the Future Employment Allocations proposed under this policy.

Appear at exam? No

Soundness Tests i

Core Strategy Submission Document

O - 16157 - 9823 - Policy ED4 - Future Employment Allocations - ii

16157 Object

CHAPTER 11 Policy ED4 - Future Employment Allocations

Respondent: mr alistir matthews [9823]

Agent: N/A

telfords farm
chelmsford road
battlesbridge
wickford
SS118TR
uk
01268732069

Full Text: The are south of london road is too vague .This is green belt some of which is agriculture land some of plotland origin .If we use my previous criteria for development in green belt the in the first instance we should look for land previously used of poor quality .There is land at Michelins Farm which fits this criteria with added advantages that it is bounded by the A130,A127, and theA1245 abutting the fairglen interchange.It also has the railway on one boundary which facilitates any future transport developments favouring rail in the future .Land adjoining forwarded to Basildons ldf.

Summary: The are south of london road is too vague .This is green belt some of which is agriculture land some of plotland origin .If we use my previous criteria for development in green belt the in the first instance we should look for land previously used of poor quality .There is land at Michelins Farm which fits this criteria with added advantages that it is bounded by the A130,A127, and theA1245 abutting the fairglen interchange.It also has the railway on one boundary which facilitates any future transport developments favouring rail in the future .Land adjoining forwarded to Basildons ldf.

Change to Plan Apply same hierachy for development as in housing provision.

Appear at exam? No

Soundness Tests ii

Core Strategy Submission Document

16201 Object

CHAPTER 11 Policy ED4 - Future Employment Allocations

Respondent: Stolkin and Clements (Southend) LLP [9891]

Stolkin and Clements (Southend) LLP
Hawkley House
28 Chapel Street
Billericay
CM12 9LU

Agent: Firstplan (Ms K Matthews) [8501]

Firstplan
25 Floral Street
London
WC2E 9DS
020 7031 8210

Full Text: Draft Policy ED4 (part 3) is unsound because the proposal to allocate industrial land in proximity to Great Wakering, to provide local employment and mitigate the de-allocation of Star Lane Industrial Estate, is not justified as it is not founded on a robust or credible evidence base.

The amount of this land required, types of uses and location of the site are not set out in the draft policy. It therefore is not justified on a robust or credible evidence base.

The land could in fact be our clients site 'Tithe Park'. However, this is unclear

The draft policy is unsound as the alternative employment land is likely to be located within the green belt, which by virtue of the nature of employment uses, may have a greater impact than providing additional residential development on green belt land, in light of this, it is not consistent with PPG2 which provides the Government' guidance on green belts.

Summary: Draft Policy ED4 (part 3) is unsound because the proposal to allocate industrial land in proximity to Great Wakering, to provide local employment and mitigate the de-allocation of Star Lane Industrial Estate, is not justified as it is not founded on a robust or credible evidence base.

Additional evidence supplied, Council ref AE26

The alternative employment land is likely to be located within the green belt, which may have a greater impact than providing additional residential development on green belt land, in light of this, it is not consistent with PPG2.

Change to Plan Amend Policy ED4 to reflect our representations.

Appear at exam? Yes **Soundness Tests** i, iii

Core Strategy Submission Document

S - 16218 - 9058 - Policy ED4 - Future Employment Allocations - None

16218 Support

CHAPTER 11 Policy ED4 - Future Employment Allocations

Respondent: C and S Associates [9058]

C and S Associates
Hawkley House
28 Chapel Street
Billericay
CM12 9LU

Agent: Firstplan (Ms K Matthews) [8501]

Firstplan
25 Floral Street
London
WC2E 9DS
020 7031 8210

Full Text: Overall, draft Policy ED4 (part 2) is sound as it is both justified and effective.

The proposed allocation of land north of London Southend Airport for employment uses is in accordance with the emerging Southend Airport Joint Area Action Plan (JAAP). It has been considered by the London Southend Airport & Environs study by Halcrow Group Ltd (June 2008) and is taken into account in the Rochford Employment Land Study by GVA Grimley (September 2008).

The development of the Brickworks Site, as part of the area known as 'north of London Southend Airport', will bring many benefits. The site is previously developed land and currently lies derelict and detracts from the surrounding landscape. Redevelopment will enhance the area and enable the clean up of the site which is likely to incur significant costs.

Whilst the draft policy encourages an Eco-Enterprise centre, it is important that the potential for other employment generating uses are not stifled because of this. It is therefore imperative that the importance of the feasibility study is explicitly stated in the policy, as is proposed. This study will need to examine market conditions, demand for eco-enterprise space, cost of build etc.

Summary: Overall, draft Policy ED4 (part 2) is sound as it is both justified and effective. The proposed allocation of land north of London Southend Airport for employment uses is in accordance with the emerging Southend Airport Joint Area Action Plan (JAAP).

The development of the Brickworks Site, as part of the area known as 'north of London Southend Airport', will bring many benefits

However, whilst the draft policy encourages an Eco-Enterprise centre, it is important that the potential for other employment generating uses are not stifled because of this.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16232 - 8650 - Policy ED4 - Future Employment Allocations - i, ii

16232 Object

CHAPTER 11 Policy ED4 - Future Employment Allocations

Respondent: Countryside Properties (Southern) Ltd (Mr Steve Price) [8650] **Agent:** N/A

Countryside Properties (Southern) Ltd
Countryside House
The Drive
Brentwood
Essex
CM13 3AT
01277260000

Full Text: We support the principle/policy of providing a range of employment uses across the District rather than focus on provision purely at London Southend Airport.

We also support the principle of a new employment allocation west of Rayleigh. As highlighted in paragraph 11.38 of the Core Strategy, west Rayleigh is an ideal location for strategic employment development. As we have stated in previous submissions to the council, land to the west of Rayleigh has the most direct and least congested link to the two principal roads serving the district (A130 and A127) and the immediate road network has capacity to accommodate further vehicular traffic. Land west of Rayleigh would therefore clearly be an attractive location for commercial/ business operators.

However, we consider that the future employment allocation should be north of London Road, not south of London Road as specified in Policy ED4. We put forward several reasons for this:

â€¢ Countryside Properties has extensive experience in providing mixed use developments, including schemes that provide both residential units and employment allocations. Bearing in mind the extent of land under option, north of London Road, we could provide a business or employment park on this land without detriment to the residential amenities of the occupiers of any new residential development, providing a comprehensive sustainable mixed use development through careful masterplanning. The viability of an employment allocation north of London Road would be assisted by the sharing of infrastructure costs with any (adjacent) residential led mixed use scheme (the residential element identified in Policy H2)

â€¢ If the employment allocation is to provide for a minimum of 2ha for business/ industrial park (as recommended in the employment land study), plus land for some of those users (to be relocated) on the Rawreth Industrial Estate (which is approximately 10ha), then probably a minimum of 10 to 12ha of land would be required. We are not sure that this size of site could be found south of London Road without affecting/requiring land occupied by existing buildings e.g. Swallows Aquatics, and/or bringing development close to the Little Wheatleys Road or the Little Wheatleys estate (see further bullet point below re green belt boundaries). There may therefore be questions over the deliverability of this allocation (without a clearer understanding of its location). We consider that 10/12 ha of land could be accommodated north of London Road, without encroaching into the flood zone or affecting any existing properties.

â€¢ Our experience shows us that for a location to be attractive, a high quality masterplanned business park of sufficient size must be available to provide the quality of environment that many businesses are now looking for. 10/12 hectares would probably be a minimum, especially if the site is to accommodate and support an Eco-Enterprise Centre (see Policy ED1). A 10 ha site could equate to 400,000 square foot of floorspace. We suggest that such a site should accommodate a variety of uses and size of units. This would enable those smaller/start up business who start on the site to have the ability to grow and still remain on the site, utilizing the enterprise centre, small start up units or urban hives (typically providing 2,000 - 5,000 square foot) then moving up to medium sized warehouse units or hybrid/ bespoke buildings. Urban Hives can be adapted to provide office or industrial space.

â€¢ As part of our previous "call for sites" submission we stated that a "hopper" or "shuttle" bus service could be provided to serve the site and nearby communities and link the area to the town centre and rail station (transport and service hubs). The benefit of a larger site allocation (mixed use residential/employment and other uses) North of London Road will be more likely to support such a service and help make it more sustainable.

â€¢ We question how a new green belt boundary south of London Road could be defined. We would suggest that any allocation here would be separated/divorced from the existing built up area (west of Rayleigh/little Wheatleys) by existing woodland planting, recreational areas, the school and plotlands to the north and west of the school. Any employment site here could not we believe integrate with the existing residential area, unless for example the plotlands are to be included within this allocation (delivery issues with various different ownerships/land assembly) or the woodland or recreation areas are to be lost, contrary to other policies and principles within the Core Strategy and bringing proposed commercial development closer to existing residential properties, to the detriment of their amenities.

Summary:

We question the appropriateness of identifying land south of London Road Rayleigh for a new employment site. We question its deliverability, and fail to see adequate evidence base to justify this decision/allocation.

We consider that the future employment allocation should be north of London Road, not south of London Road as specified in Policy ED4. We put forward several reasons for this.

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

Core Strategy Submission Document

O - 16232 - 8650 - Policy ED4 - Future Employment Allocations - i, ii

16232 Object

CHAPTER 11 Policy ED4 - Future Employment Allocations

Change to Plan The Core Strategy should show an allocation for future employment west of Rayleigh to north of London Road, rather than south of London Road.

Appear at exam? Yes **Soundness Tests** i, ii

Core Strategy Submission Document

16394 Object

CHAPTER 11 Policy ED4 - Future Employment Allocations

Respondent: Aber Ltd [8267]

Aber Ltd
C/o Agent

Agent: Colliers CRE (Mr S Chapman) [8266]

Colliers CRE
9 Marylebone Lane
London
W1U 1HL
020 7344 6533

Full Text:

In order to meet the number of jobs required in the RSS, additional employment sites will be required. The Employment Land Study recommends that any de-allocations of employment land be compensated for by the allocation of 18 hectares of new employment sites. As the supply of employment land within the District is tight, this will require the release of Green Belt land

In order to ensure that a co-ordinated approach is taken to the release of Green Belt land, the requirements for both employment and housing land should be considered together. The idea of not releasing land for residential and then releasing it for employment purposes is a contradiction, as it still requires the release of Green Belt.

The first paragraph should be reworded as follows:

'In order to compensate for the de-allocation of the existing employment land, as detailed in Policy ED3, new employment allocations will need to be located in sustainable locations to meet the needs of businesses. In order to ensure that where it is appropriate to release Green Belt sites the requirement for employment and housing sites are considered together. This will ensure that the most co-ordinated approach is adopted for the future provision. With regards future employment growth the Council will seek to direct the majority of this to the west of the District and in proximity to London Southend Airport. Some industrial land will be allocated in proximity to Great Wakering to provide local employment and mitigate the de-allocation of Star Lane Industrial Estate.'

Summary:

In order to meet the number of jobs required in the RSS, additional employment sites will be required. The Employment Land Study recommends that any de-allocations of employment land be compensated for by the allocation of 18 hectares of new employment sites. As the supply of employment land within the District is tight, this will require the release of Green Belt land

In order to ensure that a co-ordinated approach is taken to the release of Green Belt land, the requirements for both employment and housing land should be considered together. The idea of not releasing land for residential and then releasing it for employment purposes is a contradiction, as it still requires the release of Green Belt.

Change to Plan

The first paragraph should be reworded as follows:

'In order to compensate for the de-allocation of the existing employment land, as detailed in Policy ED3, new employment allocations will need to be located in sustainable locations to meet the needs of businesses. In order to ensure that where it is appropriate to release Green Belt sites the requirement for employment and housing sites are considered together. This will ensure that the most co-ordinated approach is adopted for the future provision. With regards future employment growth the Council will seek to direct the majority of this to the west of the District and in proximity to London Southend Airport. Some industrial land will be allocated in proximity to Great Wakering to provide local employment and mitigate the de-allocation of Star Lane Industrial Estate.'

Appear at exam? No

Soundness Tests ii

Core Strategy Submission Document

O - 16661 - 8069 - Policy ED4 - Future Employment Allocations - i, ii, iii

16661 Object

CHAPTER 11 Policy ED4 - Future Employment Allocations

Respondent: A W Squier LTD and the Croll Group [8069]

A W Squier LTD and the Croll Group
Doggetts
Rochford

SS4 3RN

Agent: Andrew Martin Associates Ltd (Mr R Pomery) [7786]

Andrew Martin Associates Ltd
Croxtan's Mill
Little Waltham
Chelmsford
Essex

CM3 3PJ

01245 361611

Full Text:

Policy ED4 - Future Employment Allocations

Summary: The Respondent finds the document to be unsound in its present form, however were the amendments set out in these representations to be incorporated then it is considered that the document will be sound. Concern is raised in relation to the strategy to redevelop existing employment sites for other uses and the provision of new greenfield employment sites. Should it be accepted that the existing employment sites are retained as such, then some or all of the future employment allocations will not be necessary.

Full text: It should be noted that the Core Strategy recognises that there is generally sufficient supply of employment sites but that any de-allocation will have to be compensated for. As a consequence of the strategy to reallocate employment sites under Policy H1, additional greenfield employment land is allocated under Policy ED4. As set out in our submission to Policy H1, the Council's strategy to seek the redevelopment of employment sites for alternative uses is questioned. The allocation of Stambridge Mills as a residential site is of particular concern for reasons identified elsewhere.

Should it be found that any of the employment sites proposed for residential development under Policy H1 should not come forward (in accordance with our submission to Policy H1) then some or all of the new employment sites should not come forward.

Proposed Amendment to Policy E4: Any changes to Policy H1 to retain employment sites should result in some or all of the new employment sites being deleted from Policy E4

Summary:

Masterplan/Facilities plan Council ref AE22

Policy ED4 - Future Employment Allocations

Summary: The Respondent finds the document to be unsound in its present form, however were the amendments set out in these representations to be incorporated then it is considered that the document will be sound. Concern is raised in relation to the strategy to redevelop existing employment sites for other uses and the provision of new greenfield employment sites. Should it be accepted that the existing employment sites are retained as such, then some or all of the future employment allocations will not be necessary.

Masterplan/Facilities plan Council ref AE22

Change to Plan

Proposed Amendment to Policy E4: Any changes to Policy H1 to retain employment sites should result in some or all of the new employment sites being deleted from Policy E4

Appear at exam? Yes

Soundness Tests i, ii, iii

Core Strategy Submission Document

S - 16691 - 9072 - Policy ED4 - Future Employment Allocations - None

16691 Support

CHAPTER 11 Policy ED4 - Future Employment Allocations

Respondent: Essex County Council (Mr Roy Lewis) [9072] **Agent:** N/A

Essex County Council
ESH - Spatial Planning
Planning and Transport
County Hall
Chelmsford
CM1 4JU
01245-437578

Full Text: ROCHFORD CORE STRATEGY SUBMISSION DOCUMENT, SEPTEMBER 2009
RESPONSE OF ESSEX COUNTY COUNCIL

1. General Comment

Essex County Council welcomes and broadly supports the Core Strategy prepared by Rochford District Council. The Strategy contains policies and proposals that address the spatial characteristics, issues and opportunities facing the District whilst respecting the distinctive qualities of the different settlements and parts of the District.

The County Council fully supports the maintenance of a strong policy approach to protection of the Green Belt and of the quality of environmental assets in the District whilst making adequate housing and employment provision within the District. The Core Strategy presents an approach that emphasises a balance of opportunity through the District and recognition of emerging economic prospects in the District and neighbouring areas. The intended preparation of more detailed Action Area Plans for London Southend Airport and its environs and for each of the three town centres of Rayleigh, Rochford and Hockley will further enhance the approach of the Core Strategy. The emphasis on the three town centres is particularly welcomed as offering a stimulus to improvement in the services and facilities available locally within the District whilst also affording possibilities of increased community focus.

2. Housing Distribution and Locations

The East of England Plan requires Rochford to provide a minimum of 3,790 additional dwellings between 2006 and 2021. In addition, provision for a further 1,000 dwellings should be made between 2021 and 2025 to ensure delivery of housing for at least 15 years from adoption of the Core Strategy (expected in 2010). Of this total requirement the District Council has identified a capacity of 2,000 dwellings through a Strategic Housing Land Availability Assessment. This means that the Core Strategy has to identify locations for about 1,750 dwellings to be delivered before 2021 and a further 1,000 dwellings between 2021 and 2025.

Policy H1 (The efficient use of land for housing) is supported. However, prioritisation of the reuse of previously developed land within settlements for additional housing is unlikely to provide a sufficient source of provision due to the generally residential nature of existing settlements in the district and the absence of potentially large sites of previously developed land. The assessment of potential for additional housing provision within settlements already includes the proposed re-allocation to substantially residential use of 4 existing employment areas.

Within Policy H2 (Extensions to residential envelopes and phasing) and Policy H3 (Extension to residential envelopes post-2021) the District Council has adopted a balanced approach to the distribution of additional housing locations, which is based on identification of tiers of settlements defined by reference to their accessibility to jobs, services and facilities (some of which lie outside the District) and the need to protect the valued environments within the District. This approach is generally supported, although implementation and delivery of individual schemes should give further thought to securing sustainable functional relationships between proposed development locations and availability of jobs, services and facilities.

The proposed scale and phasing of development at each of the identified locations in Policy H2 and Policy H3 should be capable of being supported by County Council service groups, provided that adequate and timely funding is available. The County Council would wish to work with the District Council to ensure that future infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

3. Economic Development

The approach to Employment Growth (Policy ED1) is supported. Given the economic structure of Rochford District the support to be given to protection and enhancement of the role of small and medium sized businesses; enhancement of the District's commercial centres; and development of a skills training academy is particularly welcome. These measures will assist in building on the existing economic resource of the District.

Proposals for the comprehensive development of London Southend Airport and its environs (Policy ED2) are supported.

Core Strategy Submission Document

S - 16691 - 9072 - Policy ED4 - Future Employment Allocations - None

16691 Support

CHAPTER 11 Policy ED4 - Future Employment Allocations

The further elaboration of proposals through an Area Action Plan will provide a firm foundation to realise the economic regeneration and growth opportunities presented by effective use of the Airport. The recognition of the potential environmental impact of the Airport and the commitment to work to mitigate any adverse impacts on the environment and local amenities is fully supported.

The location of the proposed Eco-Enterprise Centre to the North of London Southend Airport (Policy ED4) is supported. Creation of the Centre would assist reduction of the rate of business start-up failure in the district. Further the proposed location for the Centre would afford a clear offer to businesses within an area of varied business activity.

The continued protection and enhancement of existing employment land (Policy ED3) is supported, as is the identification of 4 existing employment sites for appropriate alternative, substantially residential, uses. Each of the 4 sites affords particular issues and opportunities whereby their redevelopment for other uses and relocation of existing occupiers would confer advantage for the immediately neighbouring areas and for the District as a whole.

4. Town Centres

The town centres of Rayleigh, Rochford and Hockley, and future plans for them, are closely linked to the economic development of the District but also present the opportunity to offer greater community focus within the District. The varied approach being taken to each of these town centres is supported (Policy RTC4, RTC5 and RTC6), notably the recognition of the role and purpose of the town centres beyond retail uses.

The contribution that the County Library service could make to plans for the town centres should not be overlooked. The 5 libraries in the District are substantial footfall draws in their localities and act as a 'community anchor store'. This has knock-on effects in encouraging use of neighbouring retail and service facilities. Further the Library service is currently looking at co-location opportunities for other services within the libraries which would enable them to act as a community focus.

5. Transport

The transport aspects of the Core Strategy are well balanced in identifying potential measures that would meet the needs of existing residents and businesses in the District as well as needs arising from future development. The approach reflects and makes good reference to the transportation aspirations of the County Council. The policy emphasis on close working between the District Council and the County Council to advance the transport aspirations is welcomed and fully supported.

In relation to parking standards (Policy T8 and Paragraph 10.30) the review undertaken by Essex County Council in conjunction with the Essex Planning Officers Association has now been completed. Revised parking standards have been agreed and signed off as County Supplementary Guidance, in accordance with PPS12, and is being applied by the County Council as Local Highways Authority.

6. Coastal Protection Belt

Policy ENV2 (Coastal Protection Belt) is not supported because in its current form it is not a suitable or effective replacement policy for Policy CC1 of the Replacement Structure Plan. Structure Plan Policy CC1 (The Undeveloped Coast - Coastal Protection Belt) currently remains a 'saved' policy of the Essex and Southend-on-Sea Replacement Structure Plan, April 2001 (following a direction of the Secretary of State, dated 27th September 2007, under paragraph 1(3) of Schedule 8 to the Planning and Compulsory Purchase Act 2004). The existing Policy CC1 reads, 'Within the Coastal Protection Belt defined in adopted local plans there shall be the most stringent restrictions on development within the rural and undeveloped coastline situated outside existing built-up areas, and any development which is exceptionally permitted within this Belt shall not adversely affect the open and rural character, historic features or wildlife.'

Core Strategy Policy ENV2 should be revised to include specific reference to,

- * Definition of the boundary of the Coastal Protection Belt in another Development Plan Document;
- * the application of the most stringent restrictions on development within the rural and undeveloped coastline;
- * any development exceptionally permitted not adversely affecting the open and rural character, historic features or wildlife.

7. Historic Environment

The importance of the historic environment in Rochford District is clearly identified within the Core Strategy document. Nevertheless, the policy guidance could be usefully enhanced to promote consideration and enhancement of the historic environment and use of the historic environment to shape place. This would be achieved by the following amendments to the Core Strategy,

- * Policy ENV1 (Protection and Enhancement of the Natural Landscape and Habitats and the Protection of Historical and Archaeological Sites) should be amended by deletion of the final sentence and its replacement with, The Council is committed to the protection, promotion and enhancement of the diverse historic landscape and extensive surviving archaeological deposits of the District.

Core Strategy Submission Document

S - 16691 - 9072 - Policy ED4 - Future Employment Allocations - None

16691 Support

CHAPTER 11 Policy ED4 - Future Employment Allocations

* Paragraph 8.15 of the supporting text should be amended to better support the suggested amendment to Policy ENV1. The existing text of Paragraph 8.15 should be deleted in its entirety and replaced by,
The historic environment of Rochford District has developed through a history of human activity that spans over 450,000 years. Much of the resource lies hidden beneath the ground in the form of archaeological deposits. Other elements such as the historic landscape, the pattern of field, farms, woods and grazing marsh which characterise the District, are a highly visible record of millennia of agriculture, industry and commerce. Of particular significance are the coastal, island and estuarine areas where multi-period landscapes reflecting the exploitation of coastal and marshland resource survive. The District also includes the important historic medieval market towns of Rochford and Rayleigh.

* Page 16 (Sustainable Community Strategy Priority: Promoting a Greener District) should be amended to further support the approach to the Historic Environment. The fourth bullet of the Key Section/Policies of the Core Strategy should be amended to include the word 'historic', so that the first sentence of the bullet would read,
The Environment chapter seeks to protect and enhance the biodiversity, historic and natural environment of the District by protecting sites of local, national and international importance.

8. Community Infrastructure

The approach to Community Infrastructure is supported. The County Council would wish to work with the District Council to ensure that future community infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

In addition, it should be noted that,

* Some County Council services are not highly visible despite being regarded as highly desirable community services by local residents. The need to ensure adequate funding and contributions to enable these services to meet community expectations should be recognised and acknowledged in consideration of planning obligations and standard charges.

* The Adult Community Learning Centre at Rocheway, Rochford could be better located with regard to the wider Rochford/Castle Point area of service. Relocation of the Centre could provide opportunities both at the new location and for the current site.

* The Core Strategy should make specific reference to,

o Appendix H1, Location at South Canewdon: new Early Years and Childcare facilities;

o Policy CLT2, final sentence: insert after the words 'primary schools' the words 'and Early Years and Childcare facilities';

o Appendix CLT1, Other issues/comment: for Early years and childcare facilities add 'Land to be allocated within new residential areas, as appropriate'.

9. Implementation, Delivery and Monitoring

The inclusion in the Core Strategy of a section considering Implementation, Delivery and Monitoring is welcomed and supported. Nevertheless, the District Council, in moving towards implementation and delivery of the individual elements of the Core Strategy, should highlight those schemes and projects that are critical to achievement of other aspects of the Strategy.

Further, the monitoring proposal for Policy H6 (Lifetime Homes) and for Policy CP1 (Design) should be amended,

* Policy H6 (Lifetime Homes) - the identified monitoring tool is Core Indicator H6 Housing Quality Building for Life Assessments. The Building for Life Assessment methodology was devised to measure the overall design/layout quality of housing developments. It was not devised to measure compliance with Lifetime Homes, which is largely, but not exclusively, concerned with internal space standards and the provision of internal arrangements within dwellings to meet needs of all residents.

* Policy CP1 (Design) - the monitoring indicator proposed by the Core Strategy is not supported because it is unclear what the indicator would actually be measuring. The proposed indicator should be replaced by the Core Indicator, Housing Quality - Building for Life Assessments, as suggested by the County Council in its response to the Core Strategy Preferred Options, October 2008. A better approach would be to base evaluation and monitoring of Policy CP1 on the Commission for Architecture and the Built Environment's (CABE) 20 Building for Life principles, particularly as Government has endorsed these principles and is urging local authorities to use them to assess design quality. It is suggested that the monitoring arrangements for Preferred Option CP1 be deleted and replaced by the following text, 'The success of the implementation of this policy will be monitored by assessing schemes, or an appropriate sample of schemes, against the Commission for Architecture and the Built Environment's (CABE) Building for Life principles.'

10. Access to Housing

The Core Strategy notes the higher prevalence of older people in Rochford District and the need to support them. However, a more broadly based approach to access to housing should be adopted by Policies H4, H5 and H6. It should recognise the presence of other vulnerable adults in the community, for example, those with learning or mental health disability, and the range of possible forms of accommodation, including supported, sheltered and extra care accommodation. The high level of owner occupation in the District further emphasises the need for a broader approach. The emphasis on Lifetime Homes would not address the variety of future needs, whilst the potential exemptions to the

Core Strategy Submission Document

S - 16691 - 9072 - Policy ED4 - Future Employment Allocations - None

16691 Support

CHAPTER 11 Policy ED4 - Future Employment Allocations

Lifetime Homes policy standard in Policy H6 are likely to act against demographic trends.

Summary: The location of the proposed Eco-Enterprise Centre to the North of London Southend Airport (Policy ED4) is supported. Creation of the Centre would assist reduction of the rate of business start-up failure in the district. Further the proposed location for the Centre would afford a clear offer to businesses within an area of varied business activity.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16721 - 7834 - Policy ED4 - Future Employment Allocations - i

16721 Object

CHAPTER 11 Policy ED4 - Future Employment Allocations

Respondent: Ms G Yeadell [7834]

6 Southend Road
Hockley
Essex
SS5 4QQ
01702 205450

Agent: N/A

Full Text: Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1

Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2 you discarded N.E.Hockley as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley..along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

Response to C.S Preferred Options 2008 and HAAP 2009

June 2009 issue C S Submission issue says Eldon Way will be used for housing, whereas Sept.2009 issue says "alternative uses, including residential.." to be decided by HAAP (Issues consultation done, Pref.Options issue awaited, but judging from JAAP Pref.Options decision - namely biggest option chosen against overriding opposition, it will be housing).

Need to be logical and even-handed in proposals

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

Establish likely level of Standard Charges. Accept you cannot turn district into motorways with wholesale demolition.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

Para.10.5 "..highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which cannot be altered without much destruction.

Reply to CS Pref. Options 2008 & HAAP Issues/Options 2009

Policy T3, CLT1 Appendix CLT1 Public transport RDC admits this is in the private sector. In Hockley, operator has cut No7 service to 1 per hour from Ashingdon Schools, claiming it is unviable beyond. This is unlikely to change as Hockley is car dependant. No8 bus through Hawkwell is cut to 1 per hour to Rayleigh, for same reason as No7. Proposed planning agreements with developers can't run: eg, a community centre or classroom given by a developer remains once he has moved on - how can that apply for an on-going bus service?

Reply to Infrastructure Transport in CS Pref. Opts. 2008 and to HAAP Issues Opts. 2009.

Ch.11 Economic development

Policy ED3 Core Strategy preferred Options 2008 hinted at possible housing in Eldon Way site. June 2009 Submission version, without consultation, said Eldon Way would be housing (map included Foundry, not the text). September 2009 Submission said redevelopment would be in HAAP (which apart from the Issues/Options version, is unfinished. Judging from results of JAAP Preferred Options where biggest option is chosen, though most respondents were against it, site will be housing, without consultation.

Core Strategy Submission Document

16721 Object

CHAPTER 11 Policy ED4 - Future Employment Allocations

Para.1.25, Para.11.32 Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to accommodated employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

Reply to HAAP Issues Options 2009

Remove compulsory relocation

Policy ED4 Policy states Council will allocate 18ha of land to make up for de-allocations in ED3 - that proves point above.

Proposals for moving employment to out of town locations with no existing transport links are contrary to government policies PPG4, PPS1 and PPS4 and Core Strategy Policy T1.

Evidence Base is ignored by contravening Hockley Parish Plan 2007 and ignoring residents' views on HAAP Issues/Options. Next stage of HAAP Preferred Options is pre-empted and rendered irrelevant. Core Strategy plans to relocate Eldon Way Foundry estate to Greenfield site with no nearby bus or railway. RDC plans to upgrade the nearest road to dual carriageway, though the connecting B1013 (through Hockley) will stay single, said by ECC Highways statistics to be 72% capacity. Airport bosses and council cannot suggest there will be no traffic growth from JAAP and new industrial site.

Reply to Hockley Parish Plan 2007. HAAP Issues 2009

Move to new industrial site near airport contravenes PPS4:

- EC7.3C "out of centre sites, with preference given to sites...well served by choice of...transport and...close to centre and...high likelihood of forming links with centre". There is no current public transport and links with centres is unlikely".

- EC 7.5.1 "whether the site is or will be accessible and well served by choice of transport, public transport, walking and cycling, as well as by car...". Remote location, narrow busy B1013 makes the site unsuitable for access by cycle or on foot.

It also contravenes PPS1 (27vii)... "reduce need to travel, encourage accessible public transport provision to secure more sustainable patterns of transport...Planning should actively manage patterns of urban growth to make fullest use of public transport and focus development in existing centres, near to major public transport interchanges". Core Strategy undermines its own policy Transport and Highways policy T1 and is unsound.

Although shown on accompanying drawing in earlier versions, there was no prior textual mention of Foundry industrial estate (next to Eldon Way) for redevelopment until current CS 2009 Submission. This was stated to be a typing error, but does not inspire confidence in reliability of drafting.

Revise both 2009 Core Strategy and 2009 HAAP Issues/options

Chapter 12: Retail/Town centres

The Core Strategy misrepresents findings of the Retail and Leisure Study 2008.

Para.12.38 The Core Strategy states (para.12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace."

Whereas the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure".

2) (10.28) "There is no immediate capacity for additional floorspace".

3) (10.29) "we recommend focus be maintained on developing Hockley's existing strengths, rather than retail expansion"

4) 10.31 "the current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it has a very small catchment population. Accordingly, the council may wish to consider reclassifying Hockley from a town centre to a district centre".

Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

The Council will work with landowners and its partners to deliver the HAAP.

Remove threat of compulsory purchase orders.

Core Strategy Submission Document

O - 16721 - 7834 - Policy ED4 - Future Employment Allocations - i

16721 Object

CHAPTER 11 Policy ED4 - Future Employment Allocations

One doesn't perceive impartiality when the Planning Director replies to local HAAP survey with "The affluent people of Hockley are entitled to famous name shops".

Chapter 5: Character of Place and Local Lists

Para.5.4 "Rochford district has unique character..stems from traditional buildings..still dominate towns and villages".

Para.5.17 "Council believes many buildings..are of local distinctiveness..part of..cherished local scene".

This only applies to favoured places: Rochford, Rayleigh, greenbelt villages. Many Hockley conservable items have been systemically removed for supposedly lucrative development in face of widespread protect. This is for supposed need for housing. In fact heritage items have been replaced by dwellings most cannot afford, and/or are hard to sell due to unsuitability of massing and siting. Many other homes are jeopardised by this practice.

HAAP issues 2009. Core Strategy 2006, 2007,2008, SCI.2006

Fewer 'vested interests', more even handedness. No more pressing people out of businesses, homes for expediency.

A CPRE Fieldwork issue extolled Local Lists, citing refusal of 16 flats to replace character house, not on local list. Inspector said house, facade made a contribution to area character, even if English heritage decided it didn't warrant listing. Council worked to get the house grade listed and even made adjacent area conservation one.

Hockley had one such on a "significant site" faced with 13 flats. Ward Member omitted house from refusal proposal, so house could be demolished. RDC dropped Local List ahead of appeal: "Government frowned on such Lists" (Other LAs, unaware of supposed directive retained theirs. After demolition RDC restored Local Lists, saying Government now support them. When Inspector queried the complaint, the then policy officer said "just politics, lot of local interest, nothing of character in the area[!]. (A dozen such items had been removed). Some "distinctive" Hockley buildings are still condemned (in Greensward Lane., others threatened (Spa Road). Whereas a modest hue and cry in Rayleigh will usually result in a building being saved.

Conclusion

Core Strategy Submission DPD is basically unsound in many respects

Incomplete information. Amongst others, it refers to Hockley AAP, the first stage of which is complete, but not other three. Rochford AAP first stage has been published in arrears of Core Strategy Submission. Rayleigh AAP is still awaited. Precise housing sites are absent, as Urban Capacity Study 2007 has been superseded by Strategic Housing Land Availability Assessment, not yet published. Traders, residents, are thus responding to Core Strategy Submission with incomplete information.

Lack of community involvement. Chapter 1, Introduction, para. 1.11 "Community involvement is an essential part of the plan making process".

In Statement of Community Involvement 2006 Rochford RDC "recognises need to enable people to have their voices heard".

Re Public Meetings: "Consideration will be had to timing and venue to ensure meeting is as accessible as possible".

Take Hockley Area Action Plan as an example of the opposite of all this:- Presentation of document was at Hullbridge, 7.30pm. It was also discussed with JAAP at Rochford Freight House (for traders only) at 7am, without publicity. Excuse made: HAAP on RDC website, which none will seek unless knowing it is there. Rochford District Matters newsheet had minute articles on p.3, half way through consultation period. Another excuse: a 2nd presentation by Hockley Residents Association with planning officer present: only because of complaints, and it is not the HRA's responsibility to RDC's job. Due to unavoidable haste of calling meeting, few knew and only 50 were present.

In Core Strategy Submission Hockley Parish Plan has been ignored. Proposals also ignore 95% rejection rate response to HAAP 2009, which included proposals for Eldon Way employment site.

Unfettered right of developers to carry on as if Core Strategy didn't exist. In PPS 12, Ch.4.6 states: "Core Strategies should be flexible and able to show how they handle contingencies". Several large planning applications have been submitted proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS 12.

Where are we? Finally, at Chapter 1, Introduction, para. 1.24: "the Core Strategy will have to be reviewed in the event of a new Local Area Agreement, post-2011, setting different priorities". So what purpose does all this work serve? So we have hardly finished this exercise, before it all starts again?

Summary: Policy ED4 Policy states Council will allocate 18ha of land to make up for de-allocations in ED3 - that proves point above.

Core Strategy Submission Document

16721 Object

CHAPTER 11 Policy ED4 - Future Employment Allocations

Proposals for moving employment to out of town locations with no existing transport links are contrary to government policies PPG4, PPS1 and PPS4 and Core Strategy Policy T1.

Evidence Base is ignored by contravening Hockley Parish Plan 2007 and ignoring residents' views on HAAP Issues/Options. Next stage of HAAP Preferred Options is pre-empted and rendered irrelevant. Core Strategy plans to relocate Eldon Way Foundry estate to Greenfield site with no nearby bus or railway. RDC plans to upgrade the nearest road to dual carriageway, though the connecting B1013 (through Hockley) will stay single, said by ECC Highways statistics to be 72% capacity. Airport bosses and council cannot suggest there will be no traffic growth from JAAP and new industrial site.

Move to new industrial site near airport contravenes PPS4:

- EC7.3C "out of centre sites, with preference given to sites well served by choice of transport and close to centre and high likelihood of forming links with centre". There is no current public transport and links with centres is unlikely".

- EC 7.5.1 "whether the site is or will be accessible and well served by choice of transport, public transport, walking and cycling, as well as by car.". Remote location, narrow busy B1013 makes the site unsuitable for access by cycle or on foot.

It also contravenes PPS1 (27vii). "reduce need to travel, encourage accessible public transport provision to secure more sustainable patterns of transport. Planning should actively manage patterns of urban growth to make fullest use of public transport and focus development in existing centres, near to major public transport interchanges". Core Strategy undermines its own policy Transport and Highways policy T1 and is unsound.

Although shown on accompanying drawing in earlier versions, there was no prior textual mention of Foundry industrial estate (next to Eldon Way) for redevelopment until current CS 2009 Submission. This was stated to be a typing error, but does not inspire confidence in reliability of drafting.

Change to Plan Revise both 2009 Core Strategy and 2009 HAAP Issues/options

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

16755 Object

CHAPTER 11 Policy ED4 - Future Employment Allocations

Respondent: Hockley Under Threat (J Abbey) [14229]

Hockley Under Threat
None provided

Agent: N/A

Full Text:

Ch. 4 Housing; Ch.10 Transport, Highways; Ch.11 Economic Development; Ch.12 Retail/town centres; Ch.5 Character of place & Local Lists

Chapter 4: Housing

Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1, Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2

N.E.Hockley was discarded as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley...along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

Need to be logical and even-handed in proposals

June 2009 issue C S Submission issue says Eldon Way will be used for housing, whereas Sept.2009 issue says "alternative uses, including residential.." to be decided by HAAP (Issues consultation done, Pref.Options issue awaited, but judging from JAAP Pref.Options decision - namely biggest option chosen against overriding opposition, it will be housing).

Policy H1, T1 Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG14 & PPS1. it also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths",

The Core Strategy also contravenes its own policy T1 and is unsound.

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

Establish like motorways with wholesale demolition.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts.

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Para.10.5

Policy T3, CLT1 Appendix CLT1

T1 & T2 "...highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which

Core Strategy Submission Document

16755 Object

CHAPTER 11 Policy ED4 - Future Employment Allocations

cannot be altered without much destruction.

Public transport RDC admits this is in the private sector. In Hockley, operator has cut No 7 service to one per hour from Ashingdon Schools, claiming it is unviable beyond. This is unlikely to change as Hockley is car dependant. No 8 bus through Hawkwell is cut to one per hour to Rayleigh, for same reason as No 7. Proposed planning agreements with developers can't run: e.g., a community centre or classroom given by a developer remains once he has moved on - how can that apply for an on-going bus service?

Ch.11 Economic development

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Para.1.25 Para.11.32

Policy ED4 T1 & T2 Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to accommodated employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

Remove compulsory relocation

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Revise both 2009 Core Strategy and 2009 HAAP Issues/options

Move to new industrial site near airport contravenes PPS4:

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H1 & RTC6 Although shown on accompanying drawing in earlier versions, there was no prior textual mention of Foundry industrial estate (next to Eldon Way) for redevelopment until current CS 2009 Submission. In recent amendment to the CS this was stated to be due to a typing error!

Chapter 12: Retail/Town centres

The Core Strategy misrepresents findings of the Retail and Leisure Study 2008.

Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

Para.12.38 H1 & RTC6 The Core Strategy states (para.12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace."

Whereas the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food

Core Strategy Submission Document

16755 Object

CHAPTER 11 Policy ED4 - Future Employment Allocations

shopping expenditure".

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4) 10.31 "the current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it has a very small catchment population. Accordingly, the council may wish to consider reclassifying Hockley from a town centre to a district centre".

Remove threat of compulsory purchase orders.

The Council will work with landowners and its partners to deliver the HAAP.

Chapter 5: Character of Place and Local Lists

Para.5.4 "Rochford district has unique character..stems from traditional buildings..still dominate towns and villages".

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This only appears to apply to certain places: Rochford, Rayleigh, greenbelt villages. Many Hockley conservable items have been systemically removed for supposedly lucrative development in face of widespread protect. This is for supposed need for housing. In fact heritage items have been replaced by dwellings most cannot afford, and/or are hard to sell due to unsuitability of massing and siting. Many other homes are jeopardised by this practice.

Conclusion

Core Strategy Submission DPD is basically unsound in many respects:

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Hockley Area Action Plan as an example of the opposite of all this:- Presentation of document was at Hullbridge, 7.30 p.m. It was also discussed with JAAP at Rochford Freight House (for traders only) at 7 a.m., without publicity. Excuse made: HAAP on RDC website, which none will seek unless knowing it is there. Rochford District Matters newssheet had minute articles on p.3, half way through consultation period. Another excuse: a second presentation by Hockley Residents Association with planning officer present: only because of complaints, and it is not the HRA's responsibility to RDC's job. Due to unavoidable haste of calling meeting, few knew and only 50 were present.

In Core Strategy Submission Hockley Parish Plan has been ignored. Proposals also ignore 95% rejection rate response to HAAP 2009, which included proposals for Eldon Way employment site.

Unfettered right of developers to carry on as if Core Strategy didn't exist. In PPS 12, Ch.4.6 states: "Core Strategies should be flexible and able to show how they handle contingencies". Several large planning applications have been submitted proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS 12.

Where are we? Finally, at Chapter 1, Introduction, para. 1.24: "the Core Strategy will have to be reviewed in the event of a new Local Area Agreement, post-2011, setting different priorities". So what purpose does all this work serve? So we have hardly finished this exercise, before it all starts again?

Summary:

Policy states Council will allocate 18ha of land to make up for de-allocations in ED3 - that proves point above.

Proposals for moving employment to out of town locations with no existing transport links are contrary to government policies PPG4, PPS1 and PPS4 and Core Strategy Policy T1.

Evidence Base is ignored by contravening Hockley Parish Plan 2007 and ignoring residents' views on HAAP Issues/Options. Next stage of HAAP Preferred Options is pre-empted and rendered irrelevant.

Core Strategy plans to relocate Eldon Way Foundry estate to Greenfield site with no nearby bus or railway. RDC plans to upgrade the nearest road to dual carriageway, though the connecting B1013 (through Hockley) will stay single, said by ECC Highways statistics to be 72% capacity. Airport bosses and council cannot suggest there will be no traffic growth from JAAP and new industrial site.

Core Strategy Submission Document

O - 16755 - 14229 - Policy ED4 - Future Employment Allocations - i, iii

16755 Object

CHAPTER 11 Policy ED4 - Future Employment Allocations

Move to new industrial site near airport contravenes PPS4:

EC7.3C "out of centre sites, with preference given to sites..well served by choice of..transport and..close to centre and..high likelihood of forming links with centre". There is no current public transport and links with centres is unlikely".

EC 7.5.1 "whether the site is or will be accessible and well served by choice of transport, public transport, walking and cycling, as well as by car..". Remote location, narrow busy B1013 makes the site unsuitable for access by cycle or on foot.

It also contravenes PPS1 (27vii).. "reduce need to travel, encourage accessible public transport provision to secure more sustainable patterns of transport..Planning should actively manage patterns of urban growth to make fullest use of public transport and focus development in existing centres, near to major public transport interchanges". Core Strategy undermines its own policy Transport and Highways policy T1 and is unsound.

Change to Plan Revise both 2009 Core Strategy and 2009 HAAP Issues/options

Appear at exam? Not Specified **Soundness Tests** i, iii

Core Strategy Submission Document

O - 16866 - 8318 - Policy ED4 - Future Employment Allocations - i, ii

16866 Object

CHAPTER 11 Policy ED4 - Future Employment Allocations

Respondent: Mrs E Byford [8318]

C/o Agent Stutt & Parker
Coval Hall
Chelmsford
Essex

CM1 2QF

Agent: Strutt & Parker (Mr Trevor Dodkins) [8117]

Strutt & Parker
Coval Hall
Rainsford Road
Chelmsford
Essex

CM1 2QF

01245254603

Full Text: Please see attached statement.

Council ref AE25

Summary: Please see attached statement.

Council ref AE25

Change to Plan Please see attached statement.

Council ref AE25

Appear at exam? Yes

Soundness Tests i, ii

Core Strategy Submission Document

O - 16895 - 8329 - Policy ED4 - Future Employment Allocations - i

16895 Object

CHAPTER 11 Policy ED4 - Future Employment Allocations

Respondent: Swan Hill Homes Limited [8329]

Swan Hill Homes Limited
C/O Agent
Mr P Kneen
Charles Planning

Agent: Charles Planning Associates Ltd (Mr P Kneen) [5040]

Charles Planning Associates Ltd
1644-1645 Parkway
Solent Business Park
Whiteley
Fareham
Hampshire
PO15 7AH
01489 580853

Full Text: 1.0 Instruction and Introduction

1.1 Charles Planning Associates Limited (Chartered Town Planners) is Instructed by Swan Hill Homes Limited (Swan Hill) to prepare and submit representations on their behalf in respect of the Rochford District Local Development Framework: Core Strategy Submission (September 2009) Development Plan Document.

1.2 The comments refer to the relevant sections and policy designations in the Submission document, as appropriate.

1.3 The comments set out in this submission are intended to assist the District Council in taking forward its Local Development Framework. It is our intention to continue to be involved in the LDF preparation process and we look forward to the opportunity to comment further at the Examination to the Core Strategy.

1.4 If you have any queries regarding the content of this submission then please do not hesitate to contact:

Peter Kneen BSc (Hons) MSc MRTPI
Planner

2.0 Housing:
Policy H1 - The Efficient Use of Land for Housing

2.1 Swan Hill recognises the importance of seeking to concentrate new developments mainly in the existing urban areas, on previously developed land where possible, particularly in view of the Government seeking to ensure 60% of all such new developments are on previously development land (PDL).

2.2 However, given the character of the District, and the strategic housing requirement of the East of England Plan, Swan Hill supports the approach that the Council must also make provision for additional development on the edge of existing settlements on greenfield sites, particularly in the most sustainable locations. As such, Swan Hill supports that where feasible, the redevelopment of existing employment sites for residential/employment purposes can make a contribution towards the strategic housing requirement, provided that sufficient additional employment land is brought forward to ensure the stability of employment levels in the District, and to ensure employment growth meets the East of England Plan requirements.

2.3 Swan Hill considers that Policy H1 should include consideration that new extensions to existing settlements have regard to their potential impact on the wider characteristics and openness objectives of the Green Belt.

Policy H2 - Extensions to Residential Envelopes and Phasing

2.4 Swan Hill generally supports the approach taken by the Council in this policy. As set out above, Swan Hill consider the Council's acknowledgment that housing requirements should be met through the allocation of land on the edge of the existing settlements is the most suitable way forward to meeting the Council's strategic housing requirement and complies with the advice in PPS3.

2.5 The need for suitable greenfield urban extensions represents the best way forward for the Council to meet its strategic housing requirement, as set out in the East of England Plan. Swan Hill supports the recognition that the potential supply of alternative previously developed sites is limited, without detrimentally affecting the character of the District, and therefore the best way forward is the use of sustainable greenfield urban extensions to the existing settlements of the District.

2.6 However, Swan Hill consider that a fundamental consideration that the District Council should consider relates to the potential impact of the urban extensions on the Green Belt policy has been somewhat overlooked. The wider sustainability credentials of the settlements of the District should only be one of many key considerations for determining the level of expansion. In view of the proximity of Southend-on-Sea to all the main settlements of the District, and the influence this has on the likely location many people would travel for employment and leisure, sustainability of many of the settlements is not a key overarching factor, and greater weight should be placed on the potential impact on the openness of the Green Belt, as this cannot be remedied if development occurs in the wrong location.

2.7 As such, Swan Hill considers that determining the location of growth for the main settlements should be to identify

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CHAPTER 11 Policy ED4 - Future Employment Allocations

those locations where the impact on the wider setting of the Green Belt can be minimised. Further justification for those general locations chosen should be identified in Policy H2. In this regard, Swan Hill has serious concerns regarding the removal of Land South West of Great Wakering as a viable option for the growth of the settlement. The development of this area of Great Wakering, in addition to the potential redevelopment of the Star Lane Industrial Estate could provide a more comprehensive development, whilst ensuring that the wider openness of the Green Belt is maintained. Land South West of Great Wakering is significantly better placed to limit the impact on the wider Green Belt than Land West of Great Wakering, and could contribute to the provision of an important amenity and wildlife site for the local community.

2.8 In addition, Swan Hill consider that the Council now has no reserve provision in the event that any of the existing employment sites set out in Policy H1 fail to come forward for development within the envisaged timescale. Further, Land West of Great Wakering has not been identified in the SHLAA as a deliverable site to help meet the strategic housing requirement, contrary to the requirement set out in PPS3.

2.9 As such, Swan Hill would support the provision of suitable sites which could be safeguarded for future development in the likelihood of a shortfall in supply.

Policy H3 - Extensions to Residential Envelopes Post 2021

2.10 As set out above, Swan Hill supports the overall approach the Council has taken towards the provision of sustainable urban extensions as a suitable means of meeting their strategic housing requirement. However, as set out for Policy H2 above, Swan Hill has serious concerns regarding the removal of several proposed sites set out in the October 2008 Preferred Options Core Strategy, without any guarantee of the ability to deliver those sites set out in Policy H1.

2.11 As also considered above, the inclusion of West of Great Wakering for 250 dwellings should not be included ahead of South West of Great Wakering, in view of the fact that the site is not identified in the SHLAA as available, suitable and achievable as required by PPS3, and thus is not supported by a robust and creditable evidence base for its inclusion as a strategic site for development.

2.12 Whilst Swan Hill acknowledge that alterations to Policy H1 has resulted in the removal of some locations for growth in Policy H3 (as set out in the Sustainability Appraisal), Swan Hill does not consider that the most appropriate locations have been chosen.

2.13 In addition to the matters raised above, the use of West of Great Wakering would also result in the loss of valuable agricultural land, which clearly in a Green Belt location, should be less suitable for development than other sites, such as South West of Great Wakering, which would have limited impact on the wider Green Belt policy, and not result in the loss of valuable agricultural land.

2.14 Finally, in respect of Policies H1, H2 and H3, all of the above comments are based on our interpretation of the Submission Version Core Strategy when compared to the October 2008 Version of the Core Strategy. Without the ability to undertake a detailed assessment of the Council's SHLAA, it is not possible to clarify the proposed Core Strategy position regarding the proposed direction of growth proposed for the settlements in the District. As such, Swan Hill reserves the right to make additional representations regarding the proposed Policies H1, H2 and H3 following the publication of the SHLAA in due course.

Policy H4 - Affordable Housing

2.15 In general terms, Swan Hill supports the approach taken by the Council towards the provision of affordable housing for new residential developments. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H5 - Dwelling Types

2.16 Swan Hill supports the policy provision of H5, and considers that the approach taken by the Council for this policy represents a suitably flexible alternative to stipulating percentages of dwelling mix, sought by some local authorities. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy H6 - Lifetime Homes

2.17 In regard to this policy, Swan Hill objects to the Council's policy where all new dwellings should be provided to the Lifetime Homes Standard. Whilst it is acknowledged that the UK has an aging population, Swan Hill considers that seeking to provide Lifetime Homes on all sites is considered to be overly onerous for proposed developers, particularly when considering the requirement for all car parking spaces to be suitable for disabled users, which could result in more schemes becoming unviable. Therefore, the provision of a percentage of Lifetime Homes should be considered through negotiations with the Council at the planning application stage, and should be determined on a case-by-case basis.

3.0 Character of Place: Policy CP1 - Design

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CHAPTER 11 Policy ED4 - Future Employment Allocations

3.1 The Town and Country Planning (General Development Procedure) Order 1995 (As Amended) makes the submission of a Design and Access Statement for most types of planning applications a Statutory requirement, and as such, the provision of a Design Brief represents a pre-requisite of all major planning applications.

3.2 Policy CP1 seeks to ensure the provision of good, high quality developments that reflect local characteristics and distinctiveness, this ideology is supported by Swan Hill.

4.0 The Green Belt:
Policy GB1 - Green Belt Protection

4.1 Following the amendments to the wording of the Policy since the October 2008 Preferred Options Core Strategy, Swan Hill is now generally supportive of Policy GB1 and its supporting text. However, as expressed above, it is important that where alterations to the Green Belt boundary occur as a result of the extension of the settlements to meet the strategic housing requirement, both the minimal amount of land is taken and where that land is taken for development, it represents the best available land which has a minimal impact of the wider openness characteristic of the Green Belt.

5.0 Environmental Issues:
Policy ENV3 - Flood Risk

5.1 Swan Hill generally supports the approach set out in Policy ENV3 regarding ensuring development accords with the sequential test of PPS25. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV4 - Sustainable Drainage Systems (SUDS)

5.2 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV4. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy ENV8 - On-site Renewable and Low Carbon Energy Generation

5.3 Whilst Swan Hill recognises the importance of reducing carbon emissions, particularly in new housing developments, and the role this can play in reducing the nations overall Greenhouse emissions. As such Swan Hill is generally supportive of Policy ENV8. It is noted that Policy ENG1 of the East of England Plan sets out a threshold of developments comprising 10 or more dwellings. Swan Hill consider it important for the District Council to justify the reduction in the threshold level.

5.4 Further, no assessment of Policy ENV8 has been set out in the Sustainability Appraisal which justifies the change in threshold from that of Policy ENG1 of the RSS.

Policy ENV9 - Code for Sustainable Homes

5.5 Following the revisions from the October 2008 Preferred Options Core Strategy, Swan Hill now generally supports the approach set out in Policy ENV9. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

6.0 Community Infrastructure, Leisure and Tourism:
Policy CLT1 - Planning Obligations and Standard Charges

6.1 Swan Hill generally supports the overall approach the Council has taken in Policy CLT1. It is considered Policy CLT1 sets out a degree of flexibility to ensure that all sites are considered on a site-by-site basis, assessing the individual merits of each planning application, in order to ensure the levels of contributions applicable meet the five tests of Circular 05/05. The Policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policies CLT5 - Open Space;
CLT7 - Play Space;
CLT8 - Youth Facilities; and,
CLT10 - Playing Pitches

6.2 Swan Hill supports the need for new residential developments to incorporate a degree of new publicly accessible open space, children's play space, youth facilities and playing pitches, and as such, generally supports the policy approaches taken by the Council.

6.3 However, it is important that whilst the Council may seek to undertake an assessment of providing standard charges for new development, which, as set out in Policy CLT1, this should be based on thorough public consultation and consideration and sound justification. Swan Hill consider that within the provision of a standard charge, it is important that such provision allows for a degree of flexibility to ensure that each site is assessed individually and on its own merits. This is particularly important for those sites close to existing open spaces and facilities. As such, the levels of

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CHAPTER 11 Policy ED4 - Future Employment Allocations

open space and recreation facilities required in the 'standard charge' should be based on an up-to-date PPG17 Open Space assessment, which should be used to form a key consideration in the levels of provision likely to be required in the standard charge system proposed.

7.0 Transport: Policy T1 - Highways

7.1 Swan Hill supports the overall objectives set out in Policy T1 requiring developments to be located and designed to reduce the reliance on the private car and to meet the infrastructure needs generated by development or seek to help achieve these needs is acceptable in principle.

7.2 Swan Hill recognises the importance of providing sufficient infrastructure provision to meet the requirements of development, and that where developments have insufficient consideration of impact on existing infrastructure, they should be considered unacceptable and contrary to National policy guidance. However, Swan Hill considers it important to emphasise that the developer's role should not be seen as a means to meet existing shortfalls in provision.

Policy T3 - Public Transport

7.3 Swan Hill is generally supportive of the policy approach set out in T3, however, as set out in paragraph 7.2 above, it is important that the District Council do not consider that it is the developer's responsibility to resolve existing shortfalls in provision of public transport, and any contribution towards additional public transportation provision should only be to mitigate against the additional level of demand likely from the development proposed.

Policy T5 - Cycling and Walking

7.4 Swan Hill supports the general approach to this policy, as Swan Hill recognises the importance of promoting the use of alternatives to the private car. The policy provision acknowledges the need to ensure relevant contributions in the event of additional travel demands generated by individual developments, whilst also setting out additional aspirations for the cycle network in the District.

7.5 As such, Swan Hill considers this policy accords with the advice of National Policy and is therefore considered sound by Swan Hill.

Policy T8 - Parking Standards

7.6 The Council has recently (January 2007) adopted SPD on the requirements for parking standards, and as such, Swan Hill generally supports the policy approach chosen by the Council. As set out in the SPD, whilst Swan Hill generally supports the approach taken by the District Council towards setting residential parking standards, in that the Council has recognised that in the suburban areas, even with some access to public transport, the majority of residents will rely on the use of private cars. However, Swan Hill has concerns over the failure of the District Council to comply with the provisions of PPG13: Transport (2001) which sets out that Local Planning Authorities should not set minimum standards for car parking. Whilst it is acknowledged that PPS3 sets out provision for the consideration of local circumstances, it is considered that the Council has not justified this deviation from PPG13's maximum standard.

7.7 Whilst it is acknowledged that such justification may become apparent through the work currently being undertaken by Essex County Council, until such time, the District Council should only seek to apply the maximum standards indicated in PPG13. However, Swan Hill recommends that the District Council make provisions in the wording of the Policy to allow for changes in the event that future policy on car parking standards need to reflect the County standard, following the completion of the County Council review.

8.0 Economic Development: Policies ED3 - Existing Employment Land ED4 - Future Employment Allocations

8.1 In respect of Policies ED3 and ED4, Swan Hill notes that they have changed considerably since the October 2008 Preferred Options document, in that they are site specific regarding the location of the proposed redevelopment of existing employment sites. These four sites are also identified in Policy H1 - Efficient Use of Land, and in general, Swan Hill supports the approach to the redevelopment of these sites (where feasible) based on the assessments of the sites set out in this version of the Core Strategy.

8.2 However, Swan Hill has concerns that these policies might not be considered suitably sound given that insufficient opportunity has been allocated for consultation on their redevelopment. Without the SHLAA being publically available prior to the consultation on this Core Strategy, an insufficient evidence base has been provided to corroborate that these sites are neither suitable or deliverable to meet the test of soundness requirements.

Summary:

Policies ED3 - Existing Employment Land ED4 - Future Employment Allocations

8.1 In respect of Policies ED3 and ED4, Swan Hill notes that they have changed considerably since the October 2008

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CHAPTER 11 Policy ED4 - Future Employment Allocations

Preferred Options document, in that they are site specific regarding the location of the proposed redevelopment of existing employment sites. These four sites are also identified in Policy H1 - Efficient Use of Land, and in general, Swan Hill supports the approach to the redevelopment of these sites (where feasible) based on the assessments of the sites set out in this version of the Core Strategy.

8.2 However, Swan Hill has concerns that these policies might not be considered suitably sound given that insufficient opportunity has been allocated for consultation on their redevelopment. Without the SHLAA being publically available prior to the consultation on this Core Strategy, an insufficient evidence base has been provided to corroborate that these sites are neither suitable or deliverable to meet the test of soundness requirements.

Change to Plan

Appear at exam? Yes Soundness Tests i

Core Strategy Submission Document

O - 16912 - 14278 - Policy ED4 - Future Employment Allocations - ii

16912 Object

CHAPTER 11 Policy ED4 - Future Employment Allocations

Respondent: L J Construction (Mr L Jose) [14278]

L J Construction
Unknown, represented by agent -

Mr M Carpenter
Director
Planware Ltd
The Granary
37 Walnut Tree Lane
Sudbury
Suffolk
CO10 1BD

Agent: Planware Ltd (Mr M Carpenter) [14280]

Planware Ltd
The Granary
37 Walnut Tree Lane
Sudbury
Suffolk

CO10 1BD

01787465800

Full Text: Policy ED4 is not sound as it is not precisely worded.

The main text of point 1 of policy ED4 confirms that land to the South of London Road, west of Rayleigh will be used for the relocation of displacement of Rawreth Industrial Estate industrial uses and for additional office development. The bullet points then state that industrial development will be acceptable.

The first para of point 1 should be clear and confirm that additional industrial development in addition to that displaced from Rawreth Industrial estate will be acceptable.

Proposed Change

We request the following amendment to point 1 of policy ED4:

The Council will allocate land to the south of London Road, Rayleigh to accommodate a new employment park capable of accommodating businesses displaced by the redevelopment of Rawreth Industrial Estate as well as additional office space B1 - B8 uses. It will have the following characteristics:

Site location plan received, see Council ref AE30

Summary: Policy ED4 is not sound as it is not precisely worded.

The main text of point 1 of policy ED4 confirms that land to the South of London Road, west of Rayleigh will be used for the relocation of displacement of Rawreth Industrial Estate industrial uses and for additional office development. The bullet points then state that industrial development will be acceptable.

The first para of point 1 should be clear and confirm that additional industrial development in addition to that displaced from Rawreth Industrial estate will be acceptable.

Site location plan received, see Council ref AE30

Change to Plan Proposed Change

We request the following amendment to point 1 of policy ED4:

The Council will allocate land to the south of London Road, Rayleigh to accommodate a new employment park capable of accommodating businesses displaced by the redevelopment of Rawreth Industrial Estate as well as additional B1 - B8 uses. It will have the following characteristics:

Appear at exam? No

Soundness Tests ii

Core Strategy Submission Document

O - 16925 - 10009 - Policy ED4 - Future Employment Allocations - i

16925 Object

CHAPTER 11 Policy ED4 - Future Employment Allocations

Respondent: Barratt Eastern Counties [10009]

Barratt Eastern Counties
Barratt House
7 Springfield Lyons Approach
Springfield
Chelmsford
Essex
CM2 5EY

01245 232200

Agent: Kember Loudon Williams Ltd (Mr Martin Hull) [8466]

Kember Loudon Williams Ltd
Ridgers Barn
Bunny Lane
Eridge
Tunbridge Wells

TN3 9HA
Engalnd
01892 750018

Full Text: Local Development Framework

Representations on the Core Strategy
Submission Document, November 2009
On behalf of Barratts Eastern Counties

Introduction

The requirements of Core Strategies are enshrined in the 2004 Planning and Compensation Act, the Town & Country Planning (Local Development) England (Regulations) 2004 and the 2008 policy guidance in PPS12. The requirements of Coe Strategies are clear. And they are legal requirements. The Core Strategy must comply with the Local Development Scheme, Statement of Community Involvement and the Regulations. The Core Strategy must be subject to a sustainability appraisal, have regard to national guidance, conform generally with the Regional Spatial Strategy and have regard to any Sustainable Community Strategy. A Core strategy must be sound - justified, effective and consistent with national policy. The following representations therefore focus on these legal requirements.

HOUSING

Paragraph 4.6 - Evidence Base

To meet the soundness test Submission Core Strategies (SCS) must be justified, that is to say it must be founded on robust and credible evidence base and comprise the most appropriate strategy when considered against reasonable alternatives. The housing strategy in as far as it identifies a need for Green belt sites is sound, however, there are other elements which are unsound.

Paragraph 4.6 notes that the Strategic Housing Land Availability Assessment (SHLAA) has examined the supply of housing. It is presumed that the Table at paragraph 4.6 is the outcome of this examination. Whilst the SHLAA has some legitimacy in that it identifies various sites that are apparently available, we are concerned that because the SHLAA was only published in November 2009 it post dates the SCS. This implies that the SCS is driving the SHLAA exercise rather than the other way round. Whilst this may have no real practical effect on the outcome of the SCS and the identified need for Green Belt sites, the Inspector will be mindful of the advice in paragraphs 33 and 54 of PPS3 that SCS draw on the evidence in SHLAA. It may be that the SCS should explain how the evidence base has been used to justify the strategy.

PPS12 explains at paragraph 4.37 that Core Strategies are based on thorough evidence. Since the SHLAA has only recently been published it is considered that the SCS is unsound as it is not justifiable. This, together with other comments on the SCS, indicates that the process should be delayed to ensure that a more robust document is placed in front of the EiP Inspector.

Table at Paragraph 4.6 - Evidence base

From our review of the available evidence it would appear that the housing land supply is insufficient and that Green Belt release are required. From the wider strategy being promoted we note that some of the sites that the District Council consider to be 'appropriate' are likely to relate to existing employment areas. As set out elsewhere in our representations, we maintain severe reservations that the redevelopment of existing employment sites for alternative uses and particularly the Eldon Way Industrial Estate is unsustainable. We will make reference to the effectiveness of this strategy in relation to sustainability, whether it is justified in the context of National Policy and the deliverability of such a strategy elsewhere.

In particular, paragraph 11.32 of the SCS refers to existing employment land and sites within the UCS. It does not refer the SHLAA and as such it appears that an evidence base to support the re-use of employment land for residential is not reported in the SCS.

Having reviewed the 2008 Annual Monitoring Report, as we did when commenting on the 2008 Preferred Options Core Strategy, we maintain severe doubts as to the appropriateness of some of the previously developed sites identified as potential housing sites and their expected housing yield. Whilst we cannot at this stage ascertain whether the SHLAA

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CHAPTER 11 Policy ED4 - Future Employment Allocations

sites referred to in this table correlate with the Annual Monitoring Report and indeed the 2007 Urban Capacity Study, it is our view that there will be some commonality and so the reliance on these sites is likely to be at odds with Government Policy. We shall elaborate on this objection in relation to the specific housing policy below.

We note that the last two rows in the Table at paragraph 4.6 set out figures with and without Green Belt releases. The text to this section of the Core Strategy should, for reasons of clarity, explain that Green belt review will be necessary in order to deliver the required housing.

Paragraph 4.9

The table on page 40, which sets out the settlement tiers, is supported. Rayleigh, Rochford/Ashingdon, Hockley/Hawkwell are clearly the largest settlements in the District and they benefit from good employment, housing, leisure, community and public transport provision. These settlements are the most sustainable ones with the greatest mix of uses. Consequently, it is sensible that the Core Strategy identifies these as top tier settlements and is able to target them with growth accordingly. This component of the strategy is justified by reference to sustainability data and is effective, since targeting development at these locations will ensure a more sustainable pattern of development.

Paragraph 4.14

We maintain that the strategy for redeveloping the Eldon Way Industrial Estate for housing and other alternative uses to employment is unsound. It is neither justified nor effective. The Industrial Land Availability Study 2006 sets out on page 7 strategic objectives. The 3rd objective seeks to Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive. Clearly the strategy as currently drafted envisages major changes to existing industrial estates, including alternative uses. This strategy is not consistent with other strategies and evidence based studies and so cannot be justified in the context of the tests set out in PPS12. It is also an ineffective strategy since the new employment locations that would free up the Eldon Way site for redevelopment relies on transport infrastructure that has no certainty of being delivered. Principally, the erosion of employment uses at Eldon Way could make the settlement of Hockley/Hawkwell less sustainable and thus conflict with the tiered approach on page 40, paragraph 4.9.

Policy H1

Prioritising the use of previously developed land ("pdl") is supported in principle. It is a justified strategy in the context of PPS3 and effective as sequential choices can be made by implementing the policy. However, the District Council is also promoting a strategy which seeks the redevelopment of existing employment locations to alternative uses and by consequence is identifying green field sites for new employment development elsewhere (Policy ED4 refers). This 'land swapping' is not considered consistent with PPS3, nor is it considered to be justified or effective in delivering the desired strategy. This is particularly the case as most of the existing employment sites are occupied and therefore unavailable for redevelopment. In addition, the new Greenfield sites are in an arguably less sustainable locations away from the top tier settlements identified on page 40 of the Submission Core Strategy. Clearly this element of the strategy is inconsistent with the wider strategy.

The Industrial Land Availability Study 2006 is included as an evidence base by the District Council. It includes an introductory section, which explains that the authority wishes to make Rochford the place of choice for new business. It includes several strategic objectives on page 7 including "Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive." It reviews existing employment areas and identifies vacant land, including land available from allocations. It does not include any assessment of new sites or potential opportunities for new sites that might have been expected to feed into the Core Strategy. The strategy for identifying Green Belt site employment allocation does not appear to be based on any evidence in this document and in that context cannot be justified. The strategy being promoted potentially conflicts with Government policy in PPG13, PPG2 and emerging PPS4.

The Employment Land Study 2008 is a much later document. It has a key recommendation on page ii "we recommend that Rochford District Council adopts strong policies to protect existing employment land." Furthermore under recommendations for existing sites on page iii-iv of that document it states "In our view, Hockley Trading Centre is a strategically well placed employment location. However, we recognise the ambitions of the Hockley Town Centre masterplan and that within this the Council should consider it to be allocated for other uses. However, we recommend that this reallocation happen only if provision is made within the masterplan for office use within Hockley Town Centre as part of a mixed use scheme." The view of the writers of this document is clear - the Eldon Way Industrial estate (Hockley Trading Centre) is a good employment site and that it is for other reasons that alternative uses are being considered and only then if office development is supported. This supports our representations that new future uses at the Eldon Way site should be employment dominated and that alternative uses should relate to the objectives of the Town Centre which is to enhance the shopping and leisure facilities. Residential is not an appropriate alternative.

This document recommends the use of land to the west of Rayleigh for employment and envisages Green belt release. However, the SCS does not explain through the evidence base why existing employment sites should be 'deallocated' and Green belt land unnecessarily used.

16925 Object

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In addition to these key issues we have some specific concerns. As a consequence we maintain an objection to the second paragraph of Policy H1. This policy states that the Council will seek the redevelopment of various industrial estates including Eldon Way. The Policy says that alternative uses will be sought (presumably alternative to the existing employment offer) and that new land will be allocated elsewhere. This policy statement, in relation to Eldon Way in particular, is unsound for a number of reasons:

The emerging Hockley Area Action Plan consulted upon in 2008 states that the Eldon Way Industrial Estate is strategically well placed. In a sense this statement underplays the true importance of this highly sustainable employment location and only major employment area in Hockley/Hawkwell. The employment area is adjacent to the railway station and located a short distance from the main bus routes that run along Spa Road. Some of the residential areas of the town are also within walking distance of this commercial area, thus providing a potential for sustainable travel by employees. The Eldon Way Industrial Estate is therefore right at the heart of the settlement of Hockley/Hawkwell and provides an opportunity to meet sustainable transport objectives by reducing the need to travel by car. Consequently, this employment area should be highlighted as a premier employment site in sustainability terms, both in the context of PPG13, PPG4 and PPS6. To encourage alternative uses as set out in Policy H1 implies the removal of the majority of employment based activity at Hockley/Hawkwell and this would be contrary to National policy, would not be the most appropriate strategy when considered against alternatives and is therefore unsound.

Whilst it is acknowledged that improvement to the Eldon Way Industrial Estate can and should take place, the extent to which the mix of employment uses should be altered in favour of alternative land uses requires careful consideration. It is our view that a mix of existing or indeed new employment land uses with some Town Centre type uses should dominate the Eldon Way site. A mix of employment types between offices, light industry and other high technology industries should be encouraged as this will provide many locational advantages to the firms that agglomerate together. The Council says that the existing uses on this site are harmful to amenity. However, the site has operated for many years without any significant issues and if renewal for B1 type uses are encouraged then the employment area can be maintained without harm to amenity. Renewal of the employment stock can help develop and improve trade, improve the sustainability of businesses as a whole and make for a more flexible labour market as skill levels are varied. A singularly different use altogether or a variety of uses which excludes employment could undermine the long term sustainability of the area and Town Centre. As such Policy H1 is not an effective strategy and should be amended to acknowledge the importance of Eldon Way and the need to renew the employment stock to ensure that the site maintains its important role as a employment site, albeit with some ancillary alternative use development where appropriate.

The 2008 Retail Study notes that Hockley Town Centre is not strong and there is trade leakage. Eldon Way Industrial Estate provides a customer base for existing town centre uses. Weekday spending within town centres is an important contributor to the viability of many retail and leisure businesses either through expenditure by employees during the lunchtime trade or expenditure by employers, on necessary goods and services. This relationship helps sustain the critical mass of a centre and provides a platform for new retail and leisure growth. It is important to have a balanced centre with a variety of uses. Policy H1, as currently drafted, implies the removal of employment related development and this is likely to harm the vitality and viability of Hockley Town Centre. The Council has presented no evidence to suggest that this is not the case. Importantly, the 2008 Retail Study explains that there is a need for additional retail and office space. In principle we would support additional office and other B1 type uses plus retail but employment uses should always dominate for the sustainability reasons given above. Retail and office development are likely to present a viable alternative to some of the more industrial type uses.

Consequently, we do not support the phrasing of the third paragraph of Policy H1 and maintain that the most appropriate strategy is to seek renewal of the employment stock with employment based uses and with some new retail development. Removal of employment land uses completely as currently implied-which was the approach adopted in the emerging Hockley Area Action Plan - is not a justifiable strategy.

One of the key tests of a Core Strategy is consistency between policies in the emerging Plan and this strikes at the heart of demonstrating an effective strategy. Policy H1 implies alternative uses to employment and the relocation of Eldon Way to a site identified under Policy ED4. However, Policy RTC6 sets out a suite of policy criteria for Hockley Town Centre which includes employment and commercial activities. In addition Policy ED3 seeks the protection of sustainable employment sites (Eldon Way) and notes that some reallocation of existing employment sites will include a proportion of employment. It notes that in the case of Eldon Way employment development will form a component. The policies appear at odds with one another. The third paragraph of Policy H1 should be deleted as the second paragraph is sufficient to set a strategic context for delivering new housing development. The employment policies and Hockley specific policies should be left to consider the type and quantum of land uses appropriate in the area. If the third paragraph of H1 is to be retained then it should tie in more with Policy RTC6 and in our view explain that employment uses should dominate any redevelopment proposals for the Eldon Way site and that retail and leisure uses should be a supporting proportion.

Implementation, Monitoring and Delivery - page 132 onwards

One of the key tests of soundness is that the Core Strategy should be effective - it should be able to deliver its strategy. The Implementation strategy set out at page 132 onwards of the Core Strategy does not explain how Policy H1, RTC6 and the strategy for redeveloping Eldon Way (Policy ED2 and ED3) will be delivered. The comment at Policy ED3 on

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page 161 identifies it as a potential risk and alludes to land assembly difficulties and the choices to be made by owner/occupiers. In order to deliver the strategy there should be a clear understanding as to whether the new land use values being promoted are sufficient to encourage relocation voluntarily. Secondly there is a need for more information to be gathered and presented to show that current occupiers and landowners are willing to relocate and the timescales likely for this. For example, do the building lease contracts enable early review or are there any break out clauses. There should be some commentary on whether the Council will engage in compulsory purchase orders to pursue their strategy should the 'encouragement' route fail. As currently drafted there is no clear path to deliver the strategy and the danger is that despite reallocation, the sites identified for redevelopment will not come forward in the plan period. In this regard, evidence to satisfy the test of soundness is not provided.

Policy H2 - General Locations

We support the strategy that new housing growth should be targeted at land South of Hawkwell. This area is suitably located to the urban area of Hockley/Hawkwell and to tie in with the settlement tiers on page 40 of the Submission Core Strategy the same terminology for settlement should be used. This ensures a consistency within the SCS. The choice of this location as a housing growth area is appropriate as it would not contribute to the coalescence of the urban area with Ashingdon (there is existing development between this identified housing area at Rectory Road and Ashingdon and moreover, Rectory Road can form a natural physical boundary for the new Green belt boundary. This area is also well located to the existing road network. Cherry Orchard Way has recently been improved and provides much better accessibility to the proposed housing growth area than any other location around Hockley/Hawkwell. The existing bus routes along Rectory Road also make this location sustainable and the additional housing proposed will help underpin the financial viability of bus routes in this area. Locally there are employment opportunities, including the small commercial estate off Main Road. The Eldon Way Industrial Estate adjacent to the Town Centre also provides the opportunity for employment locally. Extensive public open space, play pitches and built leisure facilities are located just to the north of this area and a community hall is located off Briar Close, nearby. The area to the south of Hockley/Hawkwell is close to local shops on the corner of Heycroft Road and Main Road and there are numerous footpath links between this area and the local community including links via Thorpe Road, Thorpe Close, Briar Close, Hawkwell Park and Park Gardens. The area therefore provides the opportunity to enhance existing links, including cycle links, and contribute towards community integration - more so than other sites on the south side of this settlement. The site is also in the control of one house builder and deliverable.

However, we find that the Policy is not fully consistent with national policy and furthermore needs to be reviewed in order to be justified and effective. We have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with this policy and feel that Green Belt review should be more explicit throughout the SCS. We note that it is only Policy H3 which indicates the need for Green Belt land review. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H2 and certainly Policy H3 and Policy GB1 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary.

Policy H2 - Phasing and Quantum

The 2008 Preferred Core Strategy document indicated that the area south of Hawkwell should deliver 330 dwellings over a phasing period to post 2021 (see Policy H2 and H3 of that document). The SCS reduces the quantum of housing in this area to 175 but expects delivery by 2015. At a broader level the Preferred Options Core Strategy of 2008, (Policy H2) required 1,450 dwellings to 2015 and a further 1,050 by 2021. In the SCS the figures are now 775 and 1,010 respectively.

Since the SHLAA post dates the publication of the SCS, we are uncertain as to the reason why such a significant reduction in quantum of housing and extensions to the residential envelope is considered necessary. Presumably it is the 'new' strategy to redevelop existing employment areas within the settlements that has led to this change. Our representations on this strategy and specifically the Eldon Way Industrial Estate are included elsewhere within our representations. Previously we have commented on the Table at paragraph 4.6 of the Submission Core Strategy and the lack of evidence to underpin that table. It seems odd that in the space of a year the expected requirement for Greenfield sites has effectively halved on the basis of a SHLAA exercise. The community is therefore not able to effectively

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comment on the housing land supply and at this stage the Submission Core Strategy is legally unsound.

That said, we are of the view that the quantum of housing envisaged south of Hockley/Hawkwell should be more than the 175 currently envisage. In coming to this view we have reviewed the Urban Capacity Study and the latest housing figures in the Annual Monitoring Report 2008. We conclude that the shortfall in housing land supply is such that 330 dwellings in this location is appropriate.

The recently published SHLAA is based upon the data obtained from the Urban Capacity Study 2007, a call for sites exercise and data from the Annual Monitoring Report 2008.

The 2007 Urban Capacity Study (UCS)

1. 2007 is widely recognised as being the peak level of house prices in the UK and it was acknowledged by Government and practitioners alike that 2007 house prices were at an unsustainable level. It is our view that utilising the 2007 UCS as an evidence base without reference to the market does not pick up the depressed demand that is likely to now exist. Recent corrections to the housing market now mean that housing land prices are at a much lower and arguably more affordable level than before. The implications are that some pdl may not be viable for housing development. Often brownfield sites have much higher development costs than Greenfield sites and so the yield from urban capacity will be much lower than anticipated in the 2007 study. One example is the employment allocation of the Adopted Local Plan located at 76-92 Main Road, Hawkwell. This site has been allocated for several years and has been available during the most recent rises in residential property prices during 2006-07. As a consequence the lack of progress on the site can only be described by its current occupancy and perhaps it comprises high value uses that do not encourage redevelopment. Despite this the site is identified as having high potential for alternative use and high potential demand. The SHLAA form notes that there is no information on legal constraints (e.g., tenancy agreements) As a consequence it is difficult to see how this could continue to be a potential site and as a consequence the allowance for green field releases should be increased.

2. There are considered to be other instances in the UCS and the recently published SHLAA where the assumptions and calculations would indicate that the 1301 urban capacity figure is over optimistic and the SHLAA assessment is limited. In the assessment of 'non-residential sites in appropriate locations' within the UCS assumptions are made as to the probability of sites coming forward for new housing. 68-72 West Street, Rochford is identified as a high probability site but we note that it has been subject to 7 refusals of planning permission/conservation consent. There is a significant gap between the urban capacity identified as being suitable by the Council and the capacity applied for by the owners. Given its alternate use value, it is debateable whether the two capacity figures can be reconciled. No 247 London Road is another example of a site allocated in the Local Plan but which hasn't come forward. This is now the subject of a proposal for a care home and if approved would further limit the scope for market/affordable housing capacity on the site. A striking example of how the urban capacity study has underestimated is also evidence by 2-4 Alderman's Hill, Hockley - described as a disused service station. There has been no residential development application on this site since 2004 and most recent applications have sought commercial use of the site. Rather than being evidence of housing land deliverability, this particular site evidences the need for commercial uses in the area. There are therefore deliverability doubts over these 'high probability' categories which amount to some 40 units.

3. In relation to the assessment in the UCS entitled 'intensification of existing residential uses' we note that the assessment is premised on an assessment of recent trends taking into account net completions between 2001-2006 and 2005-06. This is effectively an assessment of windfall trends and not an approach that PPS3 encourages. Importantly Table 3-12 in the urban capacity study seeks to project forward urban capacity from residential redevelopment - a period that benefited from high house prices and PPG3 guidance encouraging redevelopment. These two circumstances have markedly changed and so the assumptions and conclusions drawn would also have changed. Even taking into account the UCS discounting, the reliability of the 404 units from this source must be questioned and in our view the 1301 figure cannot be a sound basis for urban capacity and further Greenfield releases are necessary.

4. In the section of the UCS entitled 'subdivision of dwellings' and 'living above the shop' it is estimated that recent trends would result in 7 and 15 units. Our concerns with using trends as a basis for urban capacity are detailed above - PPS3 does not encourage this. Rather, local authorities are charged with surveying their areas, identifying which areas may yield urban capacity and how much and developing policies to achieve that. Government guidance does not encourage the estimation of windfalls in the way the UCS does.

5. Redevelopment of established employment land is a separate section within the UCS. At 1 above we identify the low probability of the Main Road residential allocation coming forward. This remaining section of the UCS considers 11 further employment sites which were first identified in the 2000 UCS. Three of these are considered to have a high probability of coming forward. We have looked at these three sites and can find no evidence that they are likely to come forward. In the 8 years between 2000 and 2008 the three identified high probability employment sites have not been developed and there is no reason to assume that the next 5-10 years will be any different. For example the Rawreth Industrial Estate is identified as being well used in the UCS and although it has some unneighbourly uses there is no indication that the site is available, suitable or deliverable for residential. Land between 39-69 Lower Lambricks, Rayleigh is identified as having a high probability of residential uses. Yet there is no

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evidence of any pre-application advice or planning applications for this area. Stambridge Mills, Mill Lane, Stambridge is a further example. This site is separated from the urban area, in a flood risk zone and protected in the 2006 Replacement Local Plan by Policy EB9 which promotes B1 uses. Against this background there is only two relevant planning applications affecting this area both date from the early 1990's and relate to a plant room and loading bay. There is no evidence that this is likely to come forward for residential purposes in the next 5-10 years.

6. In the UCS extant permissions are identified as 856 dwellings. It is important to note that this figure needs to be continually reassessed so that from the point of adoption of the Core Strategy a 5 and 10 year housing land supply is available. The SHLAA notes extant permissions for 2009-14 being 106. As noted below extant permissions do not necessarily translate into deliverable sites. There is therefore a contingency that needs to be built in. Further allocations on greenfield land need to be increased and as such the quantum of housing in the area south of Hockley/Hawkwell should be increased to 330 dwellings in order to begin to meet the shortfall identified.

The District Council's 5 year housing supply assessment

7. The District Council's Annual Monitoring Report ("AMR") 2008 purports to demonstrate a 5 year housing land supply. The preamble to Table 4.10 in the AMR 2008 explains that Rochford District Council ("RDC") has included units under construction, units with full permission, units with outline permission, units with a resolution to grant, units subject to preapplication discussion/Urban Capacity Assessment and land allocations in its trajectory. The reader is referred to Appendix B which breaks down the sites in more detail. The recently published SHLAA also includes a table showing a potential 1273 dwellings deliverable. However, it refers to "appropriate brownfield sites." Since these 'appropriate sites' are do not benefit from an application or a planning permission it is difficult to programme them into the housing delivery trajectory.

8. In the full planning permission category of the AMR 2008 where work has not yet started there can be no guarantee that all these sites will be delivered in the 5 years. This comment relates to the one above in relation to the recently published SHLAA. It is not uncommon for permissions to be obtained to provide a means for valuing a site where the owner has no immediate plans to sell the site or develop housing. Delivery may also be hampered by funding constraints, or site assembly problems (where sites are in an alternative use or relocation constraints). Appendix B of the AMR 2008 does not set out the intentions of the landowner or whether the sites are truly achievable in the 5 year period as per PPS3 requirements. The SHLAA purports to show developer intentions at Appendix C but the assessment by the local authority into the legitimacy of some of the claims is not presented. The evidence base is not as full as it should be to demonstrate the robustness of Table 4.6 of the SCS. It is also unclear the extent to which this table is based on either the UCS 2007, AMR 2008, SHLAA 2009 or a combination of all three. This should be set out clearly.

9. In addition, to the 'non delivery' of a proportion of new homes in the AMR 2008, there is concern at the timings of delivery in that data set, for example, 10 units in 2008-2009 relates to outline planning permissions and it is doubtful whether reserved matters can be turned round quick enough to begin delivering housing in this year period. There could well be examples in that set of data where the delivery of units in the first year of the 5 is unlikely, thus delivery is reduced for that period and pushed back and this process is then compounded throughout the data set up to and beyond year 5. Statistical evidence from the Department of Communities and Local Government ("CLG") reveals that building starts are 43% down on the quarter to March 2009 compared with March 2008. It is not clear whether the recently published SHLAA has taken this into account and unless it does the data in the Table at 4.6 of the SCS cannot be relied upon, particularly given the current recessionary circumstances. In relation to the Table at Paragraph 4.6 a refinement is therefore needed to take into account this effect on phasing.

10. This problem is compounded for other units relied upon where permission has been granted but no start on site has been made; this accounts for a considerable number of sites in 2009-10 period (100 dwellings) which is (year 2 of the 5 year period). A delay in these will require more Greenfield sites to be identified in order to meet the shortfall.

11. Finally we note that the East of England Plan expresses its land supply requirement as a minimum. This strategy is not reflected in the

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Submission version of the Core Strategy policy H2.

12. In summary since neither the UCS nor the Annual Monitoring Report form a SHLAA, reservations are maintained about the degree to which sufficient housing land has been identified.

Policy H3

In the Preferred Options Core Strategy 2008 more locations were identified for housing growth in the post 2021 phase. Whilst it is our view that land south of Hockley/Hawkwell should benefit from a greater number of dwellings than the 175 currently identified (330) in order to make the strategy effective. We are concerned at the significant change in strategy between the Preferred Option Core Strategy and the Submission version, which has significantly less housing growth on green field sites. This change in strategy is so significant that we would question whether it is appropriate in the context of soundness and the consultation processes that have taken place so far.

We also have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with other policies in the SCS and feel that Green Belt review should be more explicit throughout the SCS. As it currently stands there is a potential conflict with national policies and limited justification for the Green belt strategy. We note that in Policy H3, which indicates the need for Green Belt land review, the advice is limited and unclear. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H3 and Policy GB1/H2 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary. Not to do so is unsound for justification and effectiveness reasons.

Policy H4 - Affordable Housing

As currently drafted we feel that the policy is not concise enough and that the policy does not reflect current guidance. The phrase 'at least' would indicate that in most cases affordable housing above 35% will be sought. Our understanding is that the 35% figure is recommended in the SHMA and that to provide a policy framework which seeks to go beyond that figure would potentially be unworkable as many sites could not financially bare the burden of over a third of the net developable area not yielding a value. The policy should be redrafted so that "a target of 35% affordable housing shall be provided on all developments of 15 or more units..."

The last policy paragraph provides some scope to relax this policy, if there are clear site constraints that make on site provision impossible. The policy, though, is not particularly clear on what would constitute exceptional circumstances. For example, physical site constraints, which unusually raise development costs, would be one such reason and this should be specified. There may be other reasons including the nature of housing needs in the part of the District the site is located which justify affordable housing below the 35% target. Design reasons may also have a bearing on how provision is made and in what form, particularly if the site is in an historic area where design might override housing need argument. It is therefore recommended that the policy expand on the type of circumstances where affordable housing may be relaxed and the type of information that will be sought of applicant's who have a need to invoke this part of the policy.

Policy H5

In support of the policy, it is advantageous that no percentages requiring a specific mix are included. This flexibility will enable developers and the Council to respond directly to changing circumstances in the local housing market. In the past some authorities have set out a percentage for the type of housing they require only to find that after a few years of strict implementation there is an oversupply of property of that type and no flexibility in the policy to address the problem.

Policy ED2 - London Southend Airport

It is considered that to grow non aviation related employment at a location north of Southend Airport where sustainable access from the rest of Rochford District requires careful consideration. Most Airports are serviced by aviation related employment development and as such a location close to the airport is sensible and sustainable. However, for surface access reasons it would be inappropriate to encourage travel from Rochford's main settlements to what essentially

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would be a rural location for general employment uses. Whilst sustainable access would be improved by a railway station and better bus links, there is no evidence to suggest that a sustainable surface access strategy for non related employment development at the Airport can be achieved. Paragraph 11.22 explains the critical importance of a railway station to the delivery of the strategy yet the Transport Chapter and Implementation Chapter provide neither a policy nor an assessment of deliverability. It is also notable that the South Essex Rapid Transit Policy T4, as set out at paragraph 10.16, notes that Rochford is not proposed to be served but may be served in future phases. This uncertainty is no way to plan for a major employment land supply strategy in the District. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley/Hawkwell, Rochford and Rayleigh is unsound.

Policy ED3

We fully support the first sentence of the Policy and note the apparent contradiction with the statements in Policy H1 and elsewhere which seeks to develop on alternative uses at industrial estates such as Eldon Way.

This contradiction is evidence in the second paragraph of Policy ED3. In our representations on Policy H1 we have explained why it is not sound to diminish the employment stock at Eldon Way and the importance of maintaining a dominance of employment type uses at this estate. These arguments are not repeated here.

We note the sentiments of the third paragraph and in accordance with our representations elsewhere are of the view that this sentence should be revised to explain that Eldon Way will accommodate principally employment type uses. As noted elsewhere uses which are an alternative to employment would diminish this highly sustainable employment site and this is unsound when assessed against National Policy.

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In part, the de-allocation strategy is not supported as it is considered unsound when set against sustainability criteria. In relation to the Eldon Way Industrial Estate it is considered critical to the ongoing sustainability of this settlement that employment uses are maintained at this location. It is close to the railway station, bus routes and local residential areas from which the opportunity exists for employees to walk or cycle to work. Its location adjacent to the Town Centre offers opportunity for some retail and leisure development to complement the centre and to maintain a supporting function. These sustainable benefits would not occur with the deallocation of Eldon Way or the significant erosion of its employment floorspace. Whilst redevelopment of the employment site to achieve new employment is supported, the dominant land use should continue to be employment use. As a consequence, the 18ha of land required for employment in this policy is considered to be excessive and the policy should be reviewed to explain that redevelopment of existing employment sites for primarily new employment development will be encouraged.

Policy T4

It is noted that the South Essex Rapid Transit policy, as elaborated upon at paragraph 10.16 notes that Rochford is not served but may be served in future phases. This uncertainty is contrary to the delivery principles of soundness and directly puts at issue the employment land supply strategy in the District which is founded on sustainable access to new sites. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley, Rochford and Rayleigh is unsound.

Appendix H1, CTL1 - Infrastructure

It is recognised that necessary infrastructure provision is an important part of creating a sustainable development and in that context appendix H1 is supported. The supporting text notes that the table at Appendix H1 is not exhaustive and in that context it is very important that the framework properly distinguishes between what should be provided as part of new development schemes and what shouldn't. It is therefore essential that the framework acknowledges the importance of Circular 05/05 and the tests which say that provision of infrastructure and/or contributions should be:

- * Relevant to planning
- * Necessary to make the proposed development acceptable in planning terms
- * Directly related to the proposed development
- * Fairly and reasonably related in scale and kind to the proposed development
- * Reasonable in all other respects

As is made clear (Paragraph B9 of Circular 5/05) contributions should not be used to make good existing deficiencies in infrastructure provision. Nor are they to be used to secure contributions to the achievement of wider planning objectives that are not necessary for consent to be granted. In that context the Core Strategy should set this out as its policy framework.

Policy GB1 - Green Belt

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The objectives of this policy are supported, although as noted in other representations the SCS is unsound as it does not meet the tests in relation to justification, compliance with national policy or effectiveness of strategy.

Policy GB1 mentions the objective to allocate the minimum amount of Green Belt land necessary. The policy should link to the requirements of PPG2 and RSS which are discussed in relation to the representations on Policy H2 and H3. The policy should set out a timeframe for the review and why Rochford requires a Green Belt review (what the exceptional circumstances are in this District that justify a review of local boundaries. The policy should be amended to set out a 2031 time frame and this may require the SCS to have an extended life span beyond 2021.

We would recommend the deletion of the word character since Green Belt designation is not related to landscape character as currently drafted. For clarity we would also recommend that the Policy or its supporting text explain that a Green Belt review will take place in support of an allocations document (paragraph 6.6) in order to identify an appropriate new boundary. This is particularly necessary given the commitment to a Green belt review in the adopted Local Development Scheme.

Policy CLT1 - Planning Obligations and Standard Charges

In view of the need to test fully the basis on which standard charges are based it is important that any document produced is in a development plan document that enables an examination in public. The policy should explain this in order that when the document is produced it accords with Policy and is based on sound evidence.

ENV9 - Code for Sustainable Homes

Object. The advice from the Department of Communities and Local Government is that the new requirement to have a rating against the Code does not make it mandatory to build a Code home or to have each new home assessed against the Code. It does however mean that all buyers of new homes be given clear information about the sustainability of the new home. A house builder can do this in one of two ways:

- they can choose to build a Code home, have that home assessed against the Code and provide the home buyer with a Code certificate stating the star rating the home has achieved
- or, they can choose to build to current building regulations standards, not to pay for an assessment and instead download a nil-rated certificate of non-assessment (also referred to as a nil-rating) to provide to the home buyer.

As such the Rochford policy requirement that coding 3 be achieved by 2010 and Code 6 by 2013 is out of step with Government advice. The policy wording should explain that it is just the coding that is a requirement of new homes and not necessarily that new homes should be constructed to achieve a standard.

The current Government objectives are for the code to be introduced over a reasonable period with development to be code 3 by 2010, code level 4 by 2013 and code level 5 by 2016. In this regard the policy, as drafted, seeks to achieve code 6 by 2013 and consequently compresses the code requirements into a shorter time scale with the costs associated expected to be subsumed within the housing market through higher prices. This is not a realistic strategy for the delivery of sustainable homes and we consider that the policy should be revised to extend the period of compliance but to also make it more flexible based on local circumstances.

Research undertaken on behalf of the Housing Corporation and English Partnerships, published in February 2007 'A cost review of the code for sustainable homes' reveals that code 6 is unlikely to be unattainable given existing technologies and that achieving code 5 could result in a 12% to 20% increase in costs that would have to be passed onto the consumer. Given the variability of the housing market with peaks and troughs, it is unlikely that the housing market would be able to subsume this level of price increase.

The code system policy as currently drafted does not have regard to site circumstances and so many of the requirements could be difficult to meet. For example, micro electricity generation on site may be difficult to achieve where local circumstances deter the capture of wind or solar power. If more expensive technologies are required to generate power than is the norm then costs will rise. There may be other competing reasons why designs cannot include certain sustainability measures if housing sites are in sensitive landscape and historic locations. Alternatively there may be significant development costs associated with site specific circumstances and so viability of the site's development becomes a valid consideration. By insisting on the code for sustainable homes other policy objectives such as affordable housing at particular rates and other contributions may need to be reconsidered. Consequently, we are of the view that this policy should be drafted in a manner which enables site specific circumstances to be taken into account. As noted above the Government explains that the code is a certification requirement and does not necessarily mean that buildings are constructed in accordance with a code level.

It is also important to note that it is not the purpose of planning legislation to duplicate other legislation. In this regard, the policy should accept that the Building Regulations will be the main vehicle for implementing this policy and that unless the coding requires external development then there will be no need to specify what is to be carried out in a planning application.

Core Strategy Submission Document

16925 Object

CHAPTER 11 Policy ED4 - Future Employment Allocations

Summary: Policy ED4 - Future Employment Allocations

In part, the de-allocation strategy is not supported as it is considered unsound when set against sustainability criteria. In relation to the Eldon Way Industrial Estate it is considered critical to the ongoing sustainability of this settlement that employment uses are maintained at this location. It is close to the railway station, bus routes and local residential areas from which the opportunity exists for employees to walk or cycle to work. Its location adjacent to the Town Centre offers opportunity for some retail and leisure development to complement the centre and to maintain a supporting function. These sustainable benefits would not occur with the deallocation of Eldon Way or the significant erosion of its employment floorspace. Whilst redevelopment of the employment site to achieve new employment is supported, the dominant land use should continue to be employment use. As a consequence, the 18ha of land required for employment in this policy is considered to be excessive and the policy should be reviewed to explain that redevelopment of existing employment sites for primarily new employment development will be encouraged.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

S - 16066 - 14107 - Policy RTC1 - Retail in town centres - None

16066 Support

CHAPTER 12 Policy RTC1 - Retail in town centres

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: We agree with this policy, but there must be adequate parking that is not a tax on the tourist and/or shopper

Summary: We agree with this policy, but there must be adequate parking that is not a tax on the tourist and/or shopper

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 15708 - 4933 - Policy RTC2 - Sequential approach to retail development - i, ii

15708 Object

CHAPTER 12 Policy RTC2 - Sequential approach to retail development

Respondent: Mr & Mrs Cooper [4933]

11 Spencers
Hawkwell
Essex
SS5 4LW

Agent: N/A

Full Text: Proposals unsound.

Do not need more shops in Hockley, Rayleigh or Rochford. All these centres struggle to fill existing retail units and there is a predominance of charity shops already occupying prime sites which suggests that 'real' retailers cannot see a way to sustain businesses there.

Maybe if rents and rates could be reduced???

Summary: Proposals unsound.

Do not need more shops in Hockley, Rayleigh or Rochford. All these centres struggle to fill existing retail units and there is a predominance of charity shops already occupying prime sites which suggests that 'real' retailers cannot see a way to sustain businesses there.

Maybe if rents and rates could be reduced???

Change to Plan Change document to delete section proposing to direct retail development to District's town centres.

Appear at exam? No

Soundness Tests i, ii

Core Strategy Submission Document

S - 16067 - 14107 - Policy RTC3 - Village and Neighbourhood Shops - None

16067 Support

CHAPTER 12 Policy RTC3 - Village and Neighbourhood Shops

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: Agree with this policy

Summary: Agree with this policy

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16565 - 7428 - Policy RTC4 - Rayleigh Town Centre - i, ii

16565 Object

CHAPTER 12 Policy RTC4 - Rayleigh Town Centre

Respondent: The Theatres Trust (Ms R Freeman) [7428]

Agent: N/A

The Theatres Trust
22 Charing Cross Road
London
WC2H 0QL
020 7836 8591

Full Text: Core Strategy Submission

Thank you for your email of 21 September consulting The Theatres Trust on the Core Strategy Submission.

The Theatres Trust is the national advisory public body for theatres and a statutory consultee on planning applications affecting land on which there is a theatre. This applies to all theatre buildings, old and new, in current use, in other uses, or disused. Established by The Theatres Trust Act 1976 'to promote the better protection of theatres', our main objective is to safeguard theatre use, or the potential for such use but we also provide expert advice on design, conservation, property and planning matters to theatre operators, local authorities and official bodies.

Due to the specific nature of the Trust's remit we are concerned with the protection and promotion of theatres and therefore anticipate policies relating to cultural facilities.

Tests of Soundness

We do not find this document to be sound as it does not reflect your Cultural Strategy which is listed as a District Strategy on page 23, nor do we believe it will be effective.

Reasons

The Core Strategy does not address the issues raised in the Cultural Strategy:

Cultural Strategy page 5 - We have already mentioned that culture effects us all on a daily basis, so it is essential that we do not leave future developments to chance. By creating this strategy and continuing the evaluation and development of the action plans, we can ensure that all gaps in provision, opportunities, demands and aspirations, priorities and partners, are identified and acted upon.

Cultural Strategy page 12 - Lack of cultural facilities in the district was also highlighted, including no specific museum or live music and performance focused space, as well as a frustration regarding the lack of cohesive communication about all opportunities in the district.

Policy CLT9 Leisure Facilities only deals with sport and recreation, according to the accompanying text. Policy CLT6 Community Facilities does not include a description of what facilities are included in the policy and there is not Glossary for the document. It is therefore unclear where the issue of the lack of cultural facilities is attended to in the document. The most likely location for cultural facilities would be Rayleigh Town Centre but its Policy RTC4 only states that an Area Action Plan will provide a range of evening uses. The deferring of development implementations to subsequent planning documents places the reliance on these other documents to make the important decisions. The Core Strategy will set the scene for more detailed guidance but should be able to stand on its own.

The document lacks a clear spatial focus and there are few specifics as to the scale of development, the range and mix of uses, how they relate to each other and the infrastructure necessary to achieve this.

Core Strategy Submission Document

O - 16565 - 7428 - Policy RTC4 - Rayleigh Town Centre - i, ii

16565 Object

CHAPTER 12 Policy RTC4 - Rayleigh Town Centre

The policies seem to be a set of generalities lacking any real analysis of the area and the key challenges facing the District. The wording of policies needs to be robust and clear because of the way they determine whether or not, and how development can take place.

Summary: The Core Strategy does not address the issues raised in the Cultural Strategy:

Cultural Strategy page 5 - We have already mentioned that culture effects us all on a daily basis, so it is essential that we do not leave future developments to chance. By creating this strategy and continuing the evaluation and development of the action plans, we can ensure that all gaps in provision, opportunities, demands and aspirations, priorities and partners, are identified and acted upon.

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The policies seem to be a set of generalities lacking any real analysis of the area and the key challenges facing the District. The wording of policies needs to be robust and clear because of the way they determine whether or not, and how development can take place.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i, ii

Core Strategy Submission Document

S - 16693 - 9072 - Policy RTC4 - Rayleigh Town Centre - None

16693 Support

CHAPTER 12 Policy RTC4 - Rayleigh Town Centre

Respondent: Essex County Council (Mr Roy Lewis) [9072] **Agent:** N/A

Essex County Council
ESH - Spatial Planning
Planning and Transport
County Hall
Chelmsford
CM1 4JU
01245-437578

Full Text: ROCHFORD CORE STRATEGY SUBMISSION DOCUMENT, SEPTEMBER 2009
RESPONSE OF ESSEX COUNTY COUNCIL

1. General Comment

Essex County Council welcomes and broadly supports the Core Strategy prepared by Rochford District Council. The Strategy contains policies and proposals that address the spatial characteristics, issues and opportunities facing the District whilst respecting the distinctive qualities of the different settlements and parts of the District.

The County Council fully supports the maintenance of a strong policy approach to protection of the Green Belt and of the quality of environmental assets in the District whilst making adequate housing and employment provision within the District. The Core Strategy presents an approach that emphasises a balance of opportunity through the District and recognition of emerging economic prospects in the District and neighbouring areas. The intended preparation of more detailed Action Area Plans for London Southend Airport and its environs and for each of the three town centres of Rayleigh, Rochford and Hockley will further enhance the approach of the Core Strategy. The emphasis on the three town centres is particularly welcomed as offering a stimulus to improvement in the services and facilities available locally within the District whilst also affording possibilities of increased community focus.

2. Housing Distribution and Locations

The East of England Plan requires Rochford to provide a minimum of 3,790 additional dwellings between 2006 and 2021. In addition, provision for a further 1,000 dwellings should be made between 2021 and 2025 to ensure delivery of housing for at least 15 years from adoption of the Core Strategy (expected in 2010). Of this total requirement the District Council has identified a capacity of 2,000 dwellings through a Strategic Housing Land Availability Assessment. This means that the Core Strategy has to identify locations for about 1,750 dwellings to be delivered before 2021 and a further 1,000 dwellings between 2021 and 2025.

Policy H1 (The efficient use of land for housing) is supported. However, prioritisation of the reuse of previously developed land within settlements for additional housing is unlikely to provide a sufficient source of provision due to the generally residential nature of existing settlements in the district and the absence of potentially large sites of previously developed land. The assessment of potential for additional housing provision within settlements already includes the proposed re-allocation to substantially residential use of 4 existing employment areas.

Within Policy H2 (Extensions to residential envelopes and phasing) and Policy H3 (Extension to residential envelopes post-2021) the District Council has adopted a balanced approach to the distribution of additional housing locations, which is based on identification of tiers of settlements defined by reference to their accessibility to jobs, services and facilities (some of which lie outside the District) and the need to protect the valued environments within the District. This approach is generally supported, although implementation and delivery of individual schemes should give further thought to securing sustainable functional relationships between proposed development locations and availability of jobs, services and facilities.

The proposed scale and phasing of development at each of the identified locations in Policy H2 and Policy H3 should be capable of being supported by County Council service groups, provided that adequate and timely funding is available. The County Council would wish to work with the District Council to ensure that future infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

3. Economic Development

The approach to Employment Growth (Policy ED1) is supported. Given the economic structure of Rochford District the support to be given to protection and enhancement of the role of small and medium sized businesses; enhancement of the District's commercial centres; and development of a skills training academy is particularly welcome. These measures will assist in building on the existing economic resource of the District.

Proposals for the comprehensive development of London Southend Airport and its environs (Policy ED2) are supported.

Core Strategy Submission Document

S - 16693 - 9072 - Policy RTC4 - Rayleigh Town Centre - None

16693 Support

CHAPTER 12 Policy RTC4 - Rayleigh Town Centre

The further elaboration of proposals through an Area Action Plan will provide a firm foundation to realise the economic regeneration and growth opportunities presented by effective use of the Airport. The recognition of the potential environmental impact of the Airport and the commitment to work to mitigate any adverse impacts on the environment and local amenities is fully supported.

The location of the proposed Eco-Enterprise Centre to the North of London Southend Airport (Policy ED4) is supported. Creation of the Centre would assist reduction of the rate of business start-up failure in the district. Further the proposed location for the Centre would afford a clear offer to businesses within an area of varied business activity.

The continued protection and enhancement of existing employment land (Policy ED3) is supported, as is the identification of 4 existing employment sites for appropriate alternative, substantially residential, uses. Each of the 4 sites affords particular issues and opportunities whereby their redevelopment for other uses and relocation of existing occupiers would confer advantage for the immediately neighbouring areas and for the District as a whole.

4. Town Centres

The town centres of Rayleigh, Rochford and Hockley, and future plans for them, are closely linked to the economic development of the District but also present the opportunity to offer greater community focus within the District. The varied approach being taken to each of these town centres is supported (Policy RTC4, RTC5 and RTC6), notably the recognition of the role and purpose of the town centres beyond retail uses.

The contribution that the County Library service could make to plans for the town centres should not be overlooked. The 5 libraries in the District are substantial footfall draws in their localities and act as a 'community anchor store'. This has knock-on effects in encouraging use of neighbouring retail and service facilities. Further the Library service is currently looking at co-location opportunities for other services within the libraries which would enable them to act as a community focus.

5. Transport

The transport aspects of the Core Strategy are well balanced in identifying potential measures that would meet the needs of existing residents and businesses in the District as well as needs arising from future development. The approach reflects and makes good reference to the transportation aspirations of the County Council. The policy emphasis on close working between the District Council and the County Council to advance the transport aspirations is welcomed and fully supported.

In relation to parking standards (Policy T8 and Paragraph 10.30) the review undertaken by Essex County Council in conjunction with the Essex Planning Officers Association has now been completed. Revised parking standards have been agreed and signed off as County Supplementary Guidance, in accordance with PPS12, and is being applied by the County Council as Local Highways Authority.

6. Coastal Protection Belt

Policy ENV2 (Coastal Protection Belt) is not supported because in its current form it is not a suitable or effective replacement policy for Policy CC1 of the Replacement Structure Plan. Structure Plan Policy CC1 (The Undeveloped Coast - Coastal Protection Belt) currently remains a 'saved' policy of the Essex and Southend-on-Sea Replacement Structure Plan, April 2001 (following a direction of the Secretary of State, dated 27th September 2007, under paragraph 1(3) of Schedule 8 to the Planning and Compulsory Purchase Act 2004). The existing Policy CC1 reads, 'Within the Coastal Protection Belt defined in adopted local plans there shall be the most stringent restrictions on development within the rural and undeveloped coastline situated outside existing built-up areas, and any development which is exceptionally permitted within this Belt shall not adversely affect the open and rural character, historic features or wildlife.'

Core Strategy Policy ENV2 should be revised to include specific reference to,

- * Definition of the boundary of the Coastal Protection Belt in another Development Plan Document;
- * the application of the most stringent restrictions on development within the rural and undeveloped coastline;
- * any development exceptionally permitted not adversely affecting the open and rural character, historic features or wildlife.

7. Historic Environment

The importance of the historic environment in Rochford District is clearly identified within the Core Strategy document. Nevertheless, the policy guidance could be usefully enhanced to promote consideration and enhancement of the historic environment and use of the historic environment to shape place. This would be achieved by the following amendments to the Core Strategy,

- * Policy ENV1 (Protection and Enhancement of the Natural Landscape and Habitats and the Protection of Historical and Archaeological Sites) should be amended by deletion of the final sentence and its replacement with, The Council is committed to the protection, promotion and enhancement of the diverse historic landscape and extensive surviving archaeological deposits of the District.

Core Strategy Submission Document

S - 16693 - 9072 - Policy RTC4 - Rayleigh Town Centre - None

16693 Support

CHAPTER 12 Policy RTC4 - Rayleigh Town Centre

* Paragraph 8.15 of the supporting text should be amended to better support the suggested amendment to Policy ENV1. The existing text of Paragraph 8.15 should be deleted in its entirety and replaced by,
The historic environment of Rochford District has developed through a history of human activity that spans over 450,000 years. Much of the resource lies hidden beneath the ground in the form of archaeological deposits. Other elements such as the historic landscape, the pattern of field, farms, woods and grazing marsh which characterise the District, are a highly visible record of millennia of agriculture, industry and commerce. Of particular significance are the coastal, island and estuarine areas where multi-period landscapes reflecting the exploitation of coastal and marshland resource survive. The District also includes the important historic medieval market towns of Rochford and Rayleigh.

* Page 16 (Sustainable Community Strategy Priority: Promoting a Greener District) should be amended to further support the approach to the Historic Environment. The fourth bullet of the Key Section/Policies of the Core Strategy should be amended to include the word 'historic', so that the first sentence of the bullet would read,
The Environment chapter seeks to protect and enhance the biodiversity, historic and natural environment of the District by protecting sites of local, national and international importance.

8. Community Infrastructure

The approach to Community Infrastructure is supported. The County Council would wish to work with the District Council to ensure that future community infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

In addition, it should be noted that,

* Some County Council services are not highly visible despite being regarded as highly desirable community services by local residents. The need to ensure adequate funding and contributions to enable these services to meet community expectations should be recognised and acknowledged in consideration of planning obligations and standard charges.

* The Adult Community Learning Centre at Rocheway, Rochford could be better located with regard to the wider Rochford/Castle Point area of service. Relocation of the Centre could provide opportunities both at the new location and for the current site.

* The Core Strategy should make specific reference to,

o Appendix H1, Location at South Canewdon: new Early Years and Childcare facilities;

o Policy CLT2, final sentence: insert after the words 'primary schools' the words 'and Early Years and Childcare facilities';

o Appendix CLT1, Other issues/comment: for Early years and childcare facilities add 'Land to be allocated within new residential areas, as appropriate'.

9. Implementation, Delivery and Monitoring

The inclusion in the Core Strategy of a section considering Implementation, Delivery and Monitoring is welcomed and supported. Nevertheless, the District Council, in moving towards implementation and delivery of the individual elements of the Core Strategy, should highlight those schemes and projects that are critical to achievement of other aspects of the Strategy.

Further, the monitoring proposal for Policy H6 (Lifetime Homes) and for Policy CP1 (Design) should be amended,

* Policy H6 (Lifetime Homes) - the identified monitoring tool is Core Indicator H6 Housing Quality Building for Life Assessments. The Building for Life Assessment methodology was devised to measure the overall design/layout quality of housing developments. It was not devised to measure compliance with Lifetime Homes, which is largely, but not exclusively, concerned with internal space standards and the provision of internal arrangements within dwellings to meet needs of all residents.

* Policy CP1 (Design) - the monitoring indicator proposed by the Core Strategy is not supported because it is unclear what the indicator would actually be measuring. The proposed indicator should be replaced by the Core Indicator, Housing Quality - Building for Life Assessments, as suggested by the County Council in its response to the Core Strategy Preferred Options, October 2008. A better approach would be to base evaluation and monitoring of Policy CP1 on the Commission for Architecture and the Built Environment's (CABE) 20 Building for Life principles, particularly as Government has endorsed these principles and is urging local authorities to use them to assess design quality. It is suggested that the monitoring arrangements for Preferred Option CP1 be deleted and replaced by the following text, 'The success of the implementation of this policy will be monitored by assessing schemes, or an appropriate sample of schemes, against the Commission for Architecture and the Built Environment's (CABE) Building for Life principles.'

10. Access to Housing

The Core Strategy notes the higher prevalence of older people in Rochford District and the need to support them. However, a more broadly based approach to access to housing should be adopted by Policies H4, H5 and H6. It should recognise the presence of other vulnerable adults in the community, for example, those with learning or mental health disability, and the range of possible forms of accommodation, including supported, sheltered and extra care accommodation. The high level of owner occupation in the District further emphasises the need for a broader approach. The emphasis on Lifetime Homes would not address the variety of future needs, whilst the potential exemptions to the

Core Strategy Submission Document

S - 16693 - 9072 - Policy RTC4 - Rayleigh Town Centre - None

16693 Support

CHAPTER 12 Policy RTC4 - Rayleigh Town Centre

Summary: Lifetime Homes policy standard in Policy H6 are likely to act against demographic trends.
Town Centres

The town centres of Rayleigh, Rochford and Hockley, and future plans for them, are closely linked to the economic development of the District but also present the opportunity to offer greater community focus within the District. The varied approach being taken to each of these town centres is supported (Policy RTC4, RTC5 and RTC6), notably the recognition of the role and purpose of the town centres beyond retail uses.

The contribution that the County Library service could make to plans for the town centres should not be overlooked. The 5 libraries in the District are substantial footfall draws in their localities and act as a 'community anchor store'. This has knock-on effects in encouraging use of neighbouring retail and service facilities. Further the Library service is currently looking at co-location opportunities for other services within the libraries which would enable them to act as a community focus.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16068 - 14107 - Policy RTC5 - Rochford Town Centre - None

16068 Support

CHAPTER 12 Policy RTC5 - Rochford Town Centre

Respondent: Rochford & District Chamber of Trade & Commerce **Agent:** N/A
(Elizabeth Large) [14107]

Rochford & District Chamber of Trade & Commerce
c/o Baltic Distribution Limited
Baltic Wharf
Wallasea Island
Rochford
SS4 2HA

Full Text: Parking fees are detrimental to trade in towns. Parking fees are a tax on shopping.

Summary: Parking fees are detrimental to trade in towns. Parking fees are a tax on shopping.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

S - 16694 - 9072 - Policy RTC5 - Rochford Town Centre - None

16694 Support

CHAPTER 12 Policy RTC5 - Rochford Town Centre

Respondent: Essex County Council (Mr Roy Lewis) [9072] **Agent:** N/A

Essex County Council
ESH - Spatial Planning
Planning and Transport
County Hall
Chelmsford
CM1 4JU
01245-437578

Full Text: ROCHFORD CORE STRATEGY SUBMISSION DOCUMENT, SEPTEMBER 2009
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1. General Comment

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2. Housing Distribution and Locations

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The proposed scale and phasing of development at each of the identified locations in Policy H2 and Policy H3 should be capable of being supported by County Council service groups, provided that adequate and timely funding is available. The County Council would wish to work with the District Council to ensure that future infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

3. Economic Development

The approach to Employment Growth (Policy ED1) is supported. Given the economic structure of Rochford District the support to be given to protection and enhancement of the role of small and medium sized businesses; enhancement of the District's commercial centres; and development of a skills training academy is particularly welcome. These measures will assist in building on the existing economic resource of the District.

Proposals for the comprehensive development of London Southend Airport and its environs (Policy ED2) are supported.

Core Strategy Submission Document

S - 16694 - 9072 - Policy RTC5 - Rochford Town Centre - None

16694 Support

CHAPTER 12 Policy RTC5 - Rochford Town Centre

The further elaboration of proposals through an Area Action Plan will provide a firm foundation to realise the economic regeneration and growth opportunities presented by effective use of the Airport. The recognition of the potential environmental impact of the Airport and the commitment to work to mitigate any adverse impacts on the environment and local amenities is fully supported.

The location of the proposed Eco-Enterprise Centre to the North of London Southend Airport (Policy ED4) is supported. Creation of the Centre would assist reduction of the rate of business start-up failure in the district. Further the proposed location for the Centre would afford a clear offer to businesses within an area of varied business activity.

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4. Town Centres

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The contribution that the County Library service could make to plans for the town centres should not be overlooked. The 5 libraries in the District are substantial footfall draws in their localities and act as a 'community anchor store'. This has knock-on effects in encouraging use of neighbouring retail and service facilities. Further the Library service is currently looking at co-location opportunities for other services within the libraries which would enable them to act as a community focus.

5. Transport

The transport aspects of the Core Strategy are well balanced in identifying potential measures that would meet the needs of existing residents and businesses in the District as well as needs arising from future development. The approach reflects and makes good reference to the transportation aspirations of the County Council. The policy emphasis on close working between the District Council and the County Council to advance the transport aspirations is welcomed and fully supported.

In relation to parking standards (Policy T8 and Paragraph 10.30) the review undertaken by Essex County Council in conjunction with the Essex Planning Officers Association has now been completed. Revised parking standards have been agreed and signed off as County Supplementary Guidance, in accordance with PPS12, and is being applied by the County Council as Local Highways Authority.

6. Coastal Protection Belt

Policy ENV2 (Coastal Protection Belt) is not supported because in its current form it is not a suitable or effective replacement policy for Policy CC1 of the Replacement Structure Plan. Structure Plan Policy CC1 (The Undeveloped Coast - Coastal Protection Belt) currently remains a 'saved' policy of the Essex and Southend-on-Sea Replacement Structure Plan, April 2001 (following a direction of the Secretary of State, dated 27th September 2007, under paragraph 1(3) of Schedule 8 to the Planning and Compulsory Purchase Act 2004). The existing Policy CC1 reads, 'Within the Coastal Protection Belt defined in adopted local plans there shall be the most stringent restrictions on development within the rural and undeveloped coastline situated outside existing built-up areas, and any development which is exceptionally permitted within this Belt shall not adversely affect the open and rural character, historic features or wildlife.'

Core Strategy Policy ENV2 should be revised to include specific reference to,

- * Definition of the boundary of the Coastal Protection Belt in another Development Plan Document;
- * the application of the most stringent restrictions on development within the rural and undeveloped coastline;
- * any development exceptionally permitted not adversely affecting the open and rural character, historic features or wildlife.

7. Historic Environment

The importance of the historic environment in Rochford District is clearly identified within the Core Strategy document. Nevertheless, the policy guidance could be usefully enhanced to promote consideration and enhancement of the historic environment and use of the historic environment to shape place. This would be achieved by the following amendments to the Core Strategy,

- * Policy ENV1 (Protection and Enhancement of the Natural Landscape and Habitats and the Protection of Historical and Archaeological Sites) should be amended by deletion of the final sentence and its replacement with, The Council is committed to the protection, promotion and enhancement of the diverse historic landscape and extensive surviving archaeological deposits of the District.

Core Strategy Submission Document

S - 16694 - 9072 - Policy RTC5 - Rochford Town Centre - None

16694 Support

CHAPTER 12 Policy RTC5 - Rochford Town Centre

* Paragraph 8.15 of the supporting text should be amended to better support the suggested amendment to Policy ENV1. The existing text of Paragraph 8.15 should be deleted in its entirety and replaced by,
The historic environment of Rochford District has developed through a history of human activity that spans over 450,000 years. Much of the resource lies hidden beneath the ground in the form of archaeological deposits. Other elements such as the historic landscape, the pattern of field, farms, woods and grazing marsh which characterise the District, are a highly visible record of millennia of agriculture, industry and commerce. Of particular significance are the coastal, island and estuarine areas where multi-period landscapes reflecting the exploitation of coastal and marshland resource survive. The District also includes the important historic medieval market towns of Rochford and Rayleigh.

* Page 16 (Sustainable Community Strategy Priority: Promoting a Greener District) should be amended to further support the approach to the Historic Environment. The fourth bullet of the Key Section/Policies of the Core Strategy should be amended to include the word 'historic', so that the first sentence of the bullet would read,
The Environment chapter seeks to protect and enhance the biodiversity, historic and natural environment of the District by protecting sites of local, national and international importance.

8. Community Infrastructure

The approach to Community Infrastructure is supported. The County Council would wish to work with the District Council to ensure that future community infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

In addition, it should be noted that,

* Some County Council services are not highly visible despite being regarded as highly desirable community services by local residents. The need to ensure adequate funding and contributions to enable these services to meet community expectations should be recognised and acknowledged in consideration of planning obligations and standard charges.

* The Adult Community Learning Centre at Rocheway, Rochford could be better located with regard to the wider Rochford/Castle Point area of service. Relocation of the Centre could provide opportunities both at the new location and for the current site.

* The Core Strategy should make specific reference to,

o Appendix H1, Location at South Canewdon: new Early Years and Childcare facilities;

o Policy CLT2, final sentence: insert after the words 'primary schools' the words 'and Early Years and Childcare facilities';

o Appendix CLT1, Other issues/comment: for Early years and childcare facilities add 'Land to be allocated within new residential areas, as appropriate'.

9. Implementation, Delivery and Monitoring

The inclusion in the Core Strategy of a section considering Implementation, Delivery and Monitoring is welcomed and supported. Nevertheless, the District Council, in moving towards implementation and delivery of the individual elements of the Core Strategy, should highlight those schemes and projects that are critical to achievement of other aspects of the Strategy.

Further, the monitoring proposal for Policy H6 (Lifetime Homes) and for Policy CP1 (Design) should be amended,

* Policy H6 (Lifetime Homes) - the identified monitoring tool is Core Indicator H6 Housing Quality Building for Life Assessments. The Building for Life Assessment methodology was devised to measure the overall design/layout quality of housing developments. It was not devised to measure compliance with Lifetime Homes, which is largely, but not exclusively, concerned with internal space standards and the provision of internal arrangements within dwellings to meet needs of all residents.

* Policy CP1 (Design) - the monitoring indicator proposed by the Core Strategy is not supported because it is unclear what the indicator would actually be measuring. The proposed indicator should be replaced by the Core Indicator, Housing Quality - Building for Life Assessments, as suggested by the County Council in its response to the Core Strategy Preferred Options, October 2008. A better approach would be to base evaluation and monitoring of Policy CP1 on the Commission for Architecture and the Built Environment's (CABE) 20 Building for Life principles, particularly as Government has endorsed these principles and is urging local authorities to use them to assess design quality. It is suggested that the monitoring arrangements for Preferred Option CP1 be deleted and replaced by the following text, 'The success of the implementation of this policy will be monitored by assessing schemes, or an appropriate sample of schemes, against the Commission for Architecture and the Built Environment's (CABE) Building for Life principles.'

10. Access to Housing

The Core Strategy notes the higher prevalence of older people in Rochford District and the need to support them. However, a more broadly based approach to access to housing should be adopted by Policies H4, H5 and H6. It should recognise the presence of other vulnerable adults in the community, for example, those with learning or mental health disability, and the range of possible forms of accommodation, including supported, sheltered and extra care accommodation. The high level of owner occupation in the District further emphasises the need for a broader approach. The emphasis on Lifetime Homes would not address the variety of future needs, whilst the potential exemptions to the

Core Strategy Submission Document

S - 16694 - 9072 - Policy RTC5 - Rochford Town Centre - None

16694 Support

CHAPTER 12 Policy RTC5 - Rochford Town Centre

Summary: Lifetime Homes policy standard in Policy H6 are likely to act against demographic trends.
Town Centres

The town centres of Rayleigh, Rochford and Hockley, and future plans for them, are closely linked to the economic development of the District but also present the opportunity to offer greater community focus within the District. The varied approach being taken to each of these town centres is supported (Policy RTC4, RTC5 and RTC6), notably the recognition of the role and purpose of the town centres beyond retail uses.

The contribution that the County Library service could make to plans for the town centres should not be overlooked. The 5 libraries in the District are substantial footfall draws in their localities and act as a 'community anchor store'. This has knock-on effects in encouraging use of neighbouring retail and service facilities. Further the Library service is currently looking at co-location opportunities for other services within the libraries which would enable them to act as a community focus.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 15909 - 11793 - Hockley Town Centre - i, ii, iii

15909 Object

CHAPTER 12 Hockley Town Centre

Respondent: Mr Brian Guyett [11793]

2 Tonbridge Road,
Hockley
SS55HL
United Kingdom
07736211248

Agent: N/A

Full Text: The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound

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Change to Plan Defer to HAAP

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 15753 - 12097 - Hockley Town Centre, 12.35 - i

15753 Object

CHAPTER 12 Hockley Town Centre, 12.35

Respondent: mr Ian Mackenzie [12097]

27 Laburnum Grove
Hockley
Essex
SS5 4SQ
ESSEX

Agent: N/A

Full Text: Local Residents have not been given adequate chance to object or clarify what is proposed. We do not necessarily want our local shops demolished and replaced by a supermarket we have not asked for. Whilsy appreciating that the housing requirement has been imposed by an unelected regional Authority I feel that the local infarstructure is already inadequate for current needs and will struggle to cope with any further residents unless extra faciilies are provided.
Under democratic government surely we have the right to object.

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Under democratic government surely we have the right to object.

Change to Plan better clear information widely available and more consultation

Appear at exam? No **Soundness Tests** i

Core Strategy Submission Document

O - 15732 - 9844 - Hockley Town Centre, 12.37 - i, ii, iii

15732 Object

CHAPTER 12 Hockley Town Centre, 12.37

Respondent: Mr J Wiseman [9844]
Unknown

Agent: N/A

Full Text: UNSOUND. THE MENTION OF LARGE MULTIPLES IS CONFUSING. WITHIN 5 MILES WE HAVE 4 LARGE SUPERMARKETS IT IS THEREFORE AN UNNECESSARY DEVELOPMENT WITH NO VIABLE TRANSPORT PLAN FOR ALREADY OVERSTRETCHED RD B1013 THAT HAS TAILBACKS EVERY RUSH HOUR. IT REGULARLY TAKES 10-15 MINUTES TO NEGOTIATE SPA ROUNDABOUT IN RUSH HOURS

WILL LEAD TO INCREASED POLLUTION AND CONGESTION.

REGULARLY IN THE PRESS IT IS BEMOANED THAT EVERY HIGH ST LOOKS THE SAME WITH A CONSTANT ATTACK ON THE LOCAL INDEPENDENTS BY THE LARGE MULTIPLES YET THIS IS WHAT THE COUNCIL APPEARS TO WANT. LARGE MULTIPLES BRING LITTLE MONEY INTO THE LOCAL ECONOMY BUT THEY DO DESTROY LOCAL BUSINESSES AND AS MOST OF THE EMPLOYEES AND EMPLOYERS ARE LOCALS THIS LEADS TO MONEY LEAVING THE LOCAL ECONOMY AND BEING SUCKED OUT INTO OFFSHORE TAX EFFICIENT COMPANIES

Summary: UNSOUND, NO VIABLE TRAVEL PLAN, NOT IN KEEPING WITH VIBRANT LOCAL SHOPS, DESTRUCTION OF QUALITY OF LIFE INCREASED POLLUTION, CONGESTION

Change to Plan TO LEAVE AS IS KEEPING. LOCAL EMPLOYMENT IN AREA ANY DEVELOPMENTS IN AREA MUST BE MATCHED BY INVESTMENT IN LOCAL INFRASTRUCTURE, AS THIS IS NOT POSSIBLE/NOT ON THE AGENDA THEREFORE DEVELOPMENT IS UNSUSTAINABLE

Appear at exam? No

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 15869 - 14093 - Hockley Town Centre, 12.38 - i

15869 Object

CHAPTER 12 Hockley Town Centre, 12.38

Respondent: John R. Passfield [14093]

18 Woodpond Avenue
HOCKLEY
Essex.
SS5 4PX.
UK
01702 203980

Agent: N/A

Full Text: I am very concerned that Rochford District Council's Core Strategy document includes details of the re-development of Hockley Town Centre by including plans for Eldon Way and Foundry Industrial Estates. This preempts any public consultation that will take place on this subject in 2010, regarding the Hockley Area Action Plan.

Summary: I am very concerned that Rochford District Council's Core Strategy document includes details of the re-development of Hockley Town Centre by including plans for Eldon Way and Foundry Industrial Estates. This preempts any public consultation that will take place on this subject in 2010, regarding the Hockley Area Action Plan.

Change to Plan Remove all references to the specific plans for Eldon Way and Foundry Industrial Estates in the Core Strategy document. Since both these areas will be of major concern to the people of Hockley, when the public consultation period for the Hockley Area Action Plan begins in 2010.

Appear at exam? No

Soundness Tests i

Core Strategy Submission Document

O - 15921 - 11793 - Hockley Town Centre, 12.38 - i, ii, iii

15921 Object

CHAPTER 12 Hockley Town Centre, 12.38

Respondent: Mr Brian Guyett [11793]

2 Tonbridge Road,
Hockley
SS55HL
United Kingdom
07736211248

Agent: N/A

Full Text: The CS misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. and states "Hockley has great potential and has a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) "does not lend itself to a food store capable of retaining a significant proportion of main food shopping expenditure.
- 2) "there is no immediate capacity for additional floor space."
- 3) "recommend that focus be maintained on developing Hockley's existing strengths."
- 4) " consider reclassifying Hockley from a town center, to a district center".
- 5) "do not consider it to meet the definition of a 'town centre' as set out by PPS6"

Summary: The CS misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. and states "Hockley has great potential and has a need for additional convenience floorspace".

Whereas, the R&LS actually states:

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- 3) "recommend that focus be maintained on developing Hockley's existing strengths."
- 4) " consider reclassifying Hockley from a town center, to a district center".
- 5) "do not consider it to meet the definition of a 'town centre' as set out by PPS6"

Change to Plan Delete from CS and include in HAAP

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16029 - 10324 - Hockley Town Centre, 12.38 - i, ii, iii

16029 Object

CHAPTER 12 Hockley Town Centre, 12.38

Respondent: Mrs Jennifer Abbey [10324]

3 Claybrick Avenue
Hockley
Essex
SS5 4PS
UK
07768 542634

Agent: N/A

Full Text: THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.
 - 2) (10.28) "There is no immediate capacity for additional floor space."
 - 3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion"
 - 4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".
- The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states:1) "does not lend itself to a food store capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) "the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Change to Plan Delete from Core Strategy and include in HAAP

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16722 - 7834 - Hockley Town Centre, 12.38 - i

16722 Object

CHAPTER 12 Hockley Town Centre, 12.38

Respondent: Ms G Yeadell [7834]

6 Southend Road
Hockley
Essex
SS5 4QQ
01702 205450

Agent: N/A

Full Text: Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1

Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2 you discarded N.E.Hockley as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley..along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

Response to C.S Preferred Options 2008 and HAAP 2009

June 2009 issue C S Submission issue says Eldon Way will be used for housing, whereas Sept.2009 issue says "alternative uses, including residential.." to be decided by HAAP (Issues consultation done, Pref.Options issue awaited, but judging from JAAP Pref.Options decision - namely biggest option chosen against overriding opposition, it will be housing).

Need to be logical and even-handed in proposals

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

Establish likely level of Standard Charges. Accept you cannot turn district into motorways with wholesale demolition.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

Para.10.5 "..highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which cannot be altered without much destruction.

Reply to CS Pref. Options 2008 & HAAP Issues/Options 2009

Policy T3, CLT1 Appendix CLT1 Public transport RDC admits this is in the private sector. In Hockley, operator has cut No7 service to 1 per hour from Ashingdon Schools, claiming it is unviable beyond. This is unlikely to change as Hockley is car dependant. No8 bus through Hawkwell is cut to 1 per hour to Rayleigh, for same reason as No7. Proposed planning agreements with developers can't run: eg, a community centre or classroom given by a developer remains once he has moved on - how can that apply for an on-going bus service?

Reply to Infrastructure Transport in CS Pref. Opts. 2008 and to HAAP Issues Opts. 2009.

Ch.11 Economic development

Policy ED3 Core Strategy preferred Options 2008 hinted at possible housing in Eldon Way site. June 2009 Submission version, without consultation, said Eldon Way would be housing (map included Foundry, not the text). September 2009 Submission said redevelopment would be in HAAP (which apart from the Issues/Options version, is unfinished. Judging from results of JAAP Preferred Options where biggest option is chosen, though most respondents were against it, site will be housing, without consultation.

Core Strategy Submission Document

O - 16722 - 7834 - Hockley Town Centre, 12.38 - i

16722 Object

CHAPTER 12 Hockley Town Centre, 12.38

Para.1.25, Para.11.32 Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to accommodated employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

Reply to HAAP Issues Options 2009

Remove compulsory relocation

Policy ED4 Policy states Council will allocate 18ha of land to make up for de-allocations in ED3 - that proves point above.

Proposals for moving employment to out of town locations with no existing transport links are contrary to government policies PPG4, PPS1 and PPS4 and Core Strategy Policy T1.

Evidence Base is ignored by contravening Hockley Parish Plan 2007 and ignoring residents' views on HAAP Issues/Options. Next stage of HAAP Preferred Options is pre-empted and rendered irrelevant. Core Strategy plans to relocate Eldon Way Foundry estate to Greenfield site with no nearby bus or railway. RDC plans to upgrade the nearest road to dual carriageway, though the connecting B1013 (through Hockley) will stay single, said by ECC Highways statistics to be 72% capacity. Airport bosses and council cannot suggest there will be no traffic growth from JAAP and new industrial site.

Reply to Hockley Parish Plan 2007. HAAP Issues 2009

Move to new industrial site near airport contravenes PPS4:

- EC7.3C "out of centre sites, with preference given to sites...well served by choice of...transport and...close to centre and...high likelihood of forming links with centre". There is no current public transport and links with centres is unlikely".

- EC 7.5.1 "whether the site is or will be accessible and well served by choice of transport, public transport, walking and cycling, as well as by car...". Remote location, narrow busy B1013 makes the site unsuitable for access by cycle or on foot.

It also contravenes PPS1 (27vii)... "reduce need to travel, encourage accessible public transport provision to secure more sustainable patterns of transport...Planning should actively manage patterns of urban growth to make fullest use of public transport and focus development in existing centres, near to major public transport interchanges". Core Strategy undermines its own policy Transport and Highways policy T1 and is unsound.

Although shown on accompanying drawing in earlier versions, there was no prior textual mention of Foundry industrial estate (next to Eldon Way) for redevelopment until current CS 2009 Submission. This was stated to be a typing error, but does not inspire confidence in reliability of drafting.

Revise both 2009 Core Strategy and 2009 HAAP Issues/options

Chapter 12: Retail/Town centres

The Core Strategy misrepresents findings of the Retail and Leisure Study 2008.

Para.12.38 The Core Strategy states (para.12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace."

Whereas the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure".

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Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

The Council will work with landowners and its partners to deliver the HAAP.

Remove threat of compulsory purchase orders.

Core Strategy Submission Document

O - 16722 - 7834 - Hockley Town Centre, 12.38 - i

16722 Object

CHAPTER 12 Hockley Town Centre, 12.38

One doesn't perceive impartiality when the Planning Director replies to local HAAP survey with "The affluent people of Hockley are entitled to famous name shops".

Chapter 5: Character of Place and Local Lists

Para.5.4 "Rochford district has unique character..stems from traditional buildings..still dominate towns and villages".

Para.5.17 "Council believes many buildings..are of local distinctiveness..part of..cherished local scene".

This only applies to favoured places: Rochford, Rayleigh, greenbelt villages. Many Hockley conservable items have been systemically removed for supposedly lucrative development in face of widespread protect. This is for supposed need for housing. In fact heritage items have been replaced by dwellings most cannot afford, and/or are hard to sell due to unsuitability of massing and siting. Many other homes are jeopardised by this practice.

HAAP issues 2009. Core Strategy 2006, 2007,2008, SCI.2006

Fewer 'vested interests', more even handedness. No more pressing people out of businesses, homes for expediency.

A CPRE Fieldwork issue extolled Local Lists, citing refusal of 16 flats to replace character house, not on local list. Inspector said house, facade made a contribution to area character, even if English heritage decided it didn't warrant listing. Council worked to get the house grade listed and even made adjacent area conservation one.

Hockley had one such on a "significant site" faced with 13 flats. Ward Member omitted house from refusal proposal, so house could be demolished. RDC dropped Local List ahead of appeal: "Government frowned on such Lists" (Other LAs, unaware of supposed directive retained theirs. After demolition RDC restored Local Lists, saying Government now support them. When Inspector queried the complaint, the then policy officer said "just politics, lot of local interest, nothing of character in the area[!]. (A dozen such items had been removed). Some "distinctive" Hockley buildings are still condemned (in Greensward Lane.; others threatened (Spa Road). Whereas a modest hue and cry in Rayleigh will usually result in a building being saved.

Conclusion

Core Strategy Submission DPD is basically unsound in many respects

Incomplete information. Amongst others, it refers to Hockley AAP, the first stage of which is complete, but not other three. Rochford AAP first stage has been published in arrears of Core Strategy Submission. Rayleigh AAP is still awaited. Precise housing sites are absent, as Urban Capacity Study 2007 has been superseded by Strategic Housing Land Availability Assessment, not yet published. Traders, residents, are thus responding to Core Strategy Submission with incomplete information.

Lack of community involvement. Chapter 1, Introduction, para. 1.11 "Community involvement is an essential part of the plan making process".

In Statement of Community Involvement 2006 Rochford RDC "recognises need to enable people to have their voices heard".

Re Public Meetings: "Consideration will be had to timing and venue to ensure meeting is as accessible as possible".

Take Hockley Area Action Plan as an example of the opposite of all this:- Presentation of document was at Hullbridge, 7.30pm. It was also discussed with JAAP at Rochford Freight House (for traders only) at 7am, without publicity. Excuse made: HAAP on RDC website, which none will seek unless knowing it is there. Rochford District Matters newsheet had minute articles on p.3, half way through consultation period. Another excuse: a 2nd presentation by Hockley Residents Association with planning officer present: only because of complaints, and it is not the HRA's responsibility to RDC's job. Due to unavoidable haste of calling meeting, few knew and only 50 were present.

In Core Strategy Submission Hockley Parish Plan has been ignored. Proposals also ignore 95% rejection rate response to HAAP 2009, which included proposals for Eldon Way employment site.

Unfettered right of developers to carry on as if Core Strategy didn't exist. In PPS 12, Ch.4.6 states: "Core Strategies should be flexible and able to show how they handle contingencies". Several large planning applications have been submitted proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS 12.

Where are we? Finally, at Chapter 1, Introduction, para. 1.24: "the Core Strategy will have to be reviewed in the event of a new Local Area Agreement, post-2011, setting different priorities". So what purpose does all this work serve? So we have hardly finished this exercise, before it all starts again?

Summary:

Chapter 12: Retail/Town centres

The Core Strategy misrepresents findings of the Retail and Leisure Study 2008.

Core Strategy Submission Document

O - 16722 - 7834 - Hockley Town Centre, 12.38 - i

16722 Object

CHAPTER 12 Hockley Town Centre, 12.38

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Whereas the R&LS actually states:

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The Council will work with landowners and its partners to deliver the HAAP.

One doesn't perceive impartiality when the Planning Director replies to local' HAAP survey with "The affluent people of Hockley are entitled to famous name shops".

Change to Plan Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

Remove threat of compulsory purchase orders.

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16761 - 14229 - Hockley Town Centre, 12.38 - i, iii

16761 Object

CHAPTER 12 Hockley Town Centre, 12.38

Respondent: Hockley Under Threat (J Abbey) [14229]

Hockley Under Threat
None provided

Agent: N/A

Full Text:

Ch. 4 Housing; Ch.10 Transport, Highways; Ch.11 Economic Development; Ch.12 Retail/town centres; Ch.5 Character of place & Local Lists

Chapter 4: Housing

Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1, Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2

N.E.Hockley was discarded as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley...along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

Need to be logical and even-handed in proposals

June 2009 issue C S Submission issue says Eldon Way will be used for housing, whereas Sept.2009 issue says "alternative uses, including residential.." to be decided by HAAP (Issues consultation done, Pref.Options issue awaited, but judging from JAAP Pref.Options decision - namely biggest option chosen against overriding opposition, it will be housing).

Policy H1, T1 Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG14 & PPS1. it also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths",

The Core Strategy also contravenes its own policy T1 and is unsound.

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

Establish like motorways with wholesale demolition.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts.

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Para.10.5

Policy T3, CLT1 Appendix CLT1

T1 & T2 "...highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which

Core Strategy Submission Document

O - 16761 - 14229 - Hockley Town Centre, 12.38 - i, iii

16761 Object

CHAPTER 12 Hockley Town Centre, 12.38

cannot be altered without much destruction.

Public transport RDC admits this is in the private sector. In Hockley, operator has cut No 7 service to one per hour from Ashingdon Schools, claiming it is unviable beyond. This is unlikely to change as Hockley is car dependant. No 8 bus through Hawkwell is cut to one per hour to Rayleigh, for same reason as No 7. Proposed planning agreements with developers can't run: e.g., a community centre or classroom given by a developer remains once he has moved on - how can that apply for an on-going bus service?

Ch.11 Economic development

Policy ED3 Core Strategy preferred Options 2008 hinted at possible housing in Eldon Way site. June 2009 Submission version, without consultation, said Eldon Way would be housing (map included Foundry, not the text). September 2009 Submission said redevelopment would be in HAAP (which apart from the Issues/Options version, is unfinished. Judging from results of JAAP Preferred Options where biggest option is chosen, though most respondents were against it, site will be housing, without consultation.

Para.1.25 Para.11.32

Policy ED4 T1 & T2 Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to accommodated employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

Remove compulsory relocation

Policy states Council will allocate 18ha of land to make up for de-allocations in ED3 - that proves point above.

Proposals for moving employment to out of town locations with no existing transport links are contrary to government policies PPG4, PPS1 and PPS4 and Core Strategy Policy T1.

Evidence Base is ignored by contravening Hockley Parish Plan 2007 and ignoring residents' views on HAAP Issues/Options. Next stage of HAAP Preferred Options is pre-empted and rendered irrelevant.

Core Strategy plans to relocate Eldon Way Foundry estate to Greenfield site with no nearby bus or railway. RDC plans to upgrade the nearest road to dual carriageway, though the connecting B1013 (through Hockley) will stay single, said by ECC Highways statistics to be 72% capacity. Airport bosses and council cannot suggest there will be no traffic growth from JAAP and new industrial site.

Revise both 2009 Core Strategy and 2009 HAAP Issues/options

Move to new industrial site near airport contravenes PPS4:

EC7.3C "out of centre sites, with preference given to sites..well served by choice of..transport and..close to centre and..high likelihood of forming links with centre". There is no current public transport and links with centres is unlikely".

EC 7.5.1 "whether the site is or will be accessible and well served by choice of transport, public transport, walking and cycling, as well as by car..". Remote location, narrow busy B1013 makes the site unsuitable for access by cycle or on foot.

It also contravenes PPS1 (27vii).. "reduce need to travel, encourage accessible public transport provision to secure more sustainable patterns of transport..Planning should actively manage patterns of urban growth to make fullest use of public transport and focus development in existing centres, near to major public transport interchanges". Core Strategy undermines its own policy Transport and Highways policy T1 and is unsound.

H1 & RTC6 Although shown on accompanying drawing in earlier versions, there was no prior textual mention of Foundry industrial estate (next to Eldon Way) for redevelopment until current CS 2009 Submission. In recent amendment to the CS this was stated to be due to a typing error!

Chapter 12: Retail/Town centres

The Core Strategy misrepresents findings of the Retail and Leisure Study 2008.

Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

Para.12.38 H1 & RTC6 The Core Strategy states (para.12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace."

Whereas the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food

Core Strategy Submission Document

O - 16761 - 14229 - Hockley Town Centre, 12.38 - i, iii

16761 Object

CHAPTER 12 Hockley Town Centre, 12.38

shopping expenditure".

2) (10.28) "There is no immediate capacity for additional floorspace".

3) (10.29) "we recommend focus be maintained on developing Hockley's existing strengths, rather than retail expansion"

4) 10.31 "the current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it has a very small catchment population. Accordingly, the council may wish to consider reclassifying Hockley from a town centre to a district centre".

Remove threat of compulsory purchase orders.

The Council will work with landowners and its partners to deliver the HAAP.

Chapter 5: Character of Place and Local Lists

Para.5.4 "Rochford district has unique character..stems from traditional buildings..still dominate towns and villages".

Para.5.17 "Council believes many buildings..are of local distinctiveness..part of..cherished local scene".

This only appears to apply to certain places: Rochford, Rayleigh, greenbelt villages. Many Hockley conservable items have been systemically removed for supposedly lucrative development in face of widespread protect. This is for supposed need for housing. In fact heritage items have been replaced by dwellings most cannot afford, and/or are hard to sell due to unsuitability of massing and siting. Many other homes are jeopardised by this practice.

Conclusion

Core Strategy Submission DPD is basically unsound in many respects:

Incomplete information. Amongst others, it refers to Hockley AAP, the first stage of which is complete, but not other three. Rochford AAP first stage has been published in arrears of Core Strategy Submission. Rayleigh AAP is still awaited. Precise housing sites are absent, as Urban Capacity Study 2007 has been superseded by Strategic Housing Land Availability Assessment, not yet published. Traders, residents, are thus responding to Core Strategy Submission with incomplete information.

Lack of community involvement. Chapter 1, Introduction, para. 1.11 "Community involvement is an essential part of the plan making process". In Statement of Community Involvement 2006 Rochford RDC "recognises need to enable people..to have their voices heard".

Re Public Meetings: "Consideration will be had to timing and venue to ensure meeting is as accessible as possible".

Hockley Area Action Plan as an example of the opposite of all this:- Presentation of document was at Hullbridge, 7.30 p.m. It was also discussed with JAAP at Rochford Freight House (for traders only) at 7 a.m., without publicity. Excuse made: HAAP on RDC website, which none will seek unless knowing it is there. Rochford District Matters newssheet had minute articles on p.3, half way through consultation period. Another excuse: a second presentation by Hockley Residents Association with planning officer present: only because of complaints, and it is not the HRA's responsibility to RDC's job. Due to unavoidable haste of calling meeting, few knew and only 50 were present.

In Core Strategy Submission Hockley Parish Plan has been ignored. Proposals also ignore 95% rejection rate response to HAAP 2009, which included proposals for Eldon Way employment site.

Unfettered right of developers to carry on as if Core Strategy didn't exist. In PPS 12, Ch.4.6 states: "Core Strategies should be flexible and able to show how they handle contingencies". Several large planning applications have been submitted proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS 12.

Where are we? Finally, at Chapter 1, Introduction, para. 1.24: "the Core Strategy will have to be reviewed in the event of a new Local Area Agreement, post-2011, setting different priorities". So what purpose does all this work serve? So we have hardly finished this exercise, before it all starts again?

Summary:

The Core Strategy misrepresents findings of the Retail and Leisure Study 2008.

The Core Strategy states (para.12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace."

Whereas the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure".

2) (10.28) "There is no immediate capacity for additional floorspace".

3) (10.29) "we recommend focus be maintained on developing Hockley's existing strengths, rather than retail expansion"

Core Strategy Submission Document

O - 16761 - 14229 - Hockley Town Centre, 12.38 - i, iii

16761 Object

CHAPTER 12 Hockley Town Centre, 12.38

4) 10.31 "the current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it has a very small catchment population. Accordingly, the council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Council will work with landowners and its partners to deliver the HAAP.

Change to Plan Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

Remove threat of compulsory purchase orders.

Appear at exam? Not Specified **Soundness Tests** i, iii

Core Strategy Submission Document

O - 16162 - 14180 - Hockley Town Centre, 12.39 - i, ii

16162 Object

CHAPTER 12 Hockley Town Centre, 12.39

Respondent: Taylors (Hockley) Limited (Mr Paul Taylor) [14180] **Agent:** N/A

Taylors (Hockley) Limited
10a Foundry Business Park
Station Approach
Hockley
Essex
SS5 4HS
01268 774566

Full Text: My parents and I own Foundry Business Park. We have not been directly consulted about the CSP or HAAP and object. In the past six years we have already carried out extensive redevelopment of this site. We have built 24 flats and two substantial office buildings and have 20 small businesses we rent commercial units to. Some have been our tenants for 25years. These businesses are run by local people for the local community. We wish to further enhance the premises we have to allow these businesses to remain where they are, not sited miles away in a remote place.

Summary: My parents and I own Foundry Business Park. We have not been directly consulted about the CSP or HAAP and object. In the past six years we have already carried out extensive redevelopment of this site. We have built 24 flats and two substantial office buildings and have 20 small businesses we rent commercial units to. Some have been our tenants for 25years. These businesses are run by local people for the local community. We wish to further enhance the premises we have to allow these businesses to remain where they are, not sited miles away in a remote place.

Change to Plan The plans for housing on Foundry Business Park and Eldon Way are inappropriate to the area. The infrastructure would not support this. The Eldon Way Estate has a history of land contamination from the Every Ready battery factory that stood on the site some years ago. Housing would be affected by this.

The current businesses are supported by the excellent public transport links they have. Removing them to the north eastern side of the airport area, with little in the way of public transport, notably the Railway, flies in the face of national policies to ensure greater use of public transport in the future to get people to work.

Appear at exam? Yes **Soundness Tests** i, ii

Core Strategy Submission Document

O - 15746 - 12018 - Policy RTC6 - Hockley Town Centre - i

15746 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Miss S Joyce [12018]

39 Hamilton Gardens
Hockley
Essex
SS5 5BT

Agent: N/A

Full Text: Safe environment for residents - NOT when you install traffic lights at Spa roundabout, how is this a ' safe ' environment? Traffic flow is bad enough now 3.30 to 6 o'clock, by putting traffic lights YOU WILL make massive traffic jams. Allowing a major store within 50 feet of proposed traffic lights will cause massive tailbacks, ensuring the residents have to breathe more petrol fumes, how is that safe? Building 200 homes on the Eldon Way estate, possibly 400 extra cars in Hockley, village already comes to a standstill a rush hour, you are blocking up our village with traffic.

Summary: Safe environment for residents - NOT when you install traffic lights at Spa roundabout, how is this a ' safe ' environment? Traffic flow is bad enough now 3.30 to 6 o'clock, by putting traffic lights YOU WILL make massive traffic jams. Allowing a major store within 50 feet of proposed traffic lights will cause massive tailbacks, ensuring the residents have to breathe more petrol fumes, how is that safe? Building 200 homes on the Eldon Way estate, possibly 400 extra cars in Hockley, village already comes to a standstill a rush hour, you are blocking up our village with traffic.

Change to Plan You are NOT making a sound environment, my change would be NOT have a Tesco right near the junction build it on the Eldon Way estate out of the way. Do NOT put traffic lights at Spa roundabout, keep traffic moving better by leaving it as a roundabout, it's safer for all our health.

Appear at exam? No

Soundness Tests i

Core Strategy Submission Document

O - 15782 - 14065 - Policy RTC6 - Hockley Town Centre - i

15782 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Mr Barry Hudson [14065]

52 Gladstone Road
Hockley
Essex
ss5 4bt
01702 205721

Agent: N/A

Full Text:

I was born in Hockley and have lived here all of my life (43 years). People like the village because it is exactly that.....a village, we do not want to become a town and definitely no more housing as the infrastructure will not cope in spite of any plans you may have to update it.

Please leave Hockley as it is, else you may find a fair proportion of the decent population deciding to leave< I for one would definitely consider it.

If people wanted to live in a bustling town they would go and find one.

Summary:

I was born in Hockley and have lived here all of my life (43 years). People like the village because it is exactly that.....a village, we do not want to become a town and definitely no more housing as the infrastructure will not cope in spite of any plans you may have to update it.

Please leave Hockley as it is, else you may find a fair proportion of the decent population deciding to leave< I for one would definitely consider it.

If people wanted to live in a bustling town they would go and find one.

Change to Plan

Normal residents are not solicitors/lawyers and therefore should not be asked questions of the nature below as part of this survey

Appear at exam? No

Soundness Tests i

Core Strategy Submission Document

O - 15840 - 4951 - Policy RTC6 - Hockley Town Centre - i, ii, iii

15840 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Hockley Residents Association (Mr B Guyett) [4951] **Agent:** N/A

Hockley Residents Association
2 Tonbridge Road
Hockley
Essex
SS5 5HL

Full Text:

Previous consultations ignored by RDC:

i. The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, developments. and the proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

Summary:

Previous consultations ignored by RDC:

i. The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, developments. and the proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

Change to Plan

Defer all plans for Hockley Town Centre to the Hockley Area Action Plan consultation

Appear at exam? No

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 15842 - 4951 - Policy RTC6 - Hockley Town Centre - i, ii, iii

15842 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Hockley Residents Association (Mr B Guyett) [4951] **Agent:** N/A

Hockley Residents Association
2 Tonbridge Road
Hockley
Essex
SS5 5HL

Full Text: RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates
i. The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely
i. the Foundry Industrial Estate has never even been previously mentioned in any plan version;
i. The Urban Capacity study stated a "low probability" of housing and did not mention the Foundry Estate

The proposals are not founded on a robust and credible evidence base and are unsound.

Summary: RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates
i. The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely
i. the Foundry Industrial Estate has never even been previously mentioned in any plan version;
i. The Urban Capacity study stated a "low probability" of housing and did not mention the Foundry Estate

The proposals are not founded on a robust and credible evidence base and are unsound.

Change to Plan Defer plans for Hockley Town Centre to form part of the HAAP consultation

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 15847 - 4951 - Policy RTC6 - Hockley Town Centre - i, ii, iii

15847 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Hockley Residents Association (Mr B Guyett) [4951] **Agent:** N/A

Hockley Residents Association
2 Tonbridge Road
Hockley
Essex
SS5 5HL

Full Text: Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary: The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Change to Plan Defer all of Hockley Town Centre and include as part of the ongoing HAAP

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 15850 - 4951 - Policy RTC6 - Hockley Town Centre - i, ii, iii

15850 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Hockley Residents Association (Mr B Guyett) [4951] **Agent:** N/A

Hockley Residents Association
2 Tonbridge Road
Hockley
Essex
SS5 5HL

Full Text: THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.
 - 2) (10.28) "There is no immediate capacity for additional floor space."
 - 3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion"
 - 4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".
- The Core Strategy is inaccurate, misleading and unsound.

Summary: THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace".

Whereas, the R&LS states:

- 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.
- 2) "There is no immediate capacity for additional floor space."
- 3) "we recommend that focus be maintained on developing Hockley's existing strengths."
- 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Change to Plan Delete all reference to Hockly Town Centre and include in ongoing HAAP consultation

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 15870 - 14093 - Policy RTC6 - Hockley Town Centre - i

15870 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: John R. Passfield [14093]

18 Woodpond Avenue
HOCKLEY
Essex.
SS5 4PX.
UK
01702 203980

Agent: N/A

Full Text: Here the Core Strategy is preempting any public consultation regarding the future development of Hockley Village Centre.

Summary: Here the Core Strategy is preempting any public consultation regarding the future development of Hockley Village Centre.

Change to Plan Remove any specific detail of re-development in Hockley Village centre until the public have had a chance to submit their choices when the Hockley Area Action Plan consultation takes place in 2010.

Appear at exam? No

Soundness Tests i

Core Strategy Submission Document

O - 15906 - 11793 - Policy RTC6 - Hockley Town Centre - i, ii, iii

15906 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Mr Brian Guyett [11793]

2 Tonbridge Road,
Hockley
SS55HL
United Kingdom
07736211248

Agent: N/A

Full Text:

Previous consultations ignored by RDC:

The Hockley Parish Plan (dated 2007). The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

Summary:

Previous consultations ignored by RDC:

The Hockley Parish Plan (dated 2007). The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

Change to Plan Revise policy

Appear at exam? No

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 15908 - 11793 - Policy RTC6 - Hockley Town Centre - i, ii, iii

15908 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Mr Brian Guyett [11793]

2 Tonbridge Road,
Hockley
SS55HL
United Kingdom
07736211248

Agent: N/A

Full Text:

RDC not consulted on proposals to relocate the Eldon Way and Foundry Industrial Estates

EW; CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" absolutely no consultation on concept of moving EW businesses entirely

FIE; has never even been previously mentioned in any plan version; CS states omission was due to typing error!

Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

RDC not consulted on proposals to relocate the Eldon Way and Foundry Industrial Estates

EW; CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" absolutely no consultation on concept of moving EW businesses entirely

FIE; has never even been previously mentioned in any plan version; CS states omission was due to typing error!

Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus proposals are not founded on a robust and credible evidence base and are unsound.

Change to Plan

Defer to HAAP

Appear at exam? No

Soundness Tests

i, ii, iii

Core Strategy Submission Document

O - 16021 - 10324 - Policy RTC6 - Hockley Town Centre - i, ii, iii

16021 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Mrs Jennifer Abbey [10324]

3 Claybrick Avenue
Hockley
Essex
SS5 4PS
UK
07768 542634

Agent: N/A

Full Text:

Previous consultations ignored by RDC:

â€¢ The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

â€¢ The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

Previous consultations ignored by RDC:

The proposals ignore to 95 % rejection rate of respondents to RDC's own Hockley Area Action Plan (HAAP) Consultation 2009, which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Change to Plan Revise policy

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16025 - 10324 - Policy RTC6 - Hockley Town Centre - i, ii, iii

16025 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Mrs Jennifer Abbey [10324]

3 Claybrick Avenue
Hockley
Essex
SS5 4PS
UK
07768 542634

Agent: N/A

Full Text: RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates
â€¢ The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely
â€¢ The Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!
â€¢ The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Summary: RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates
â€¢ The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely
â€¢ The Foundry Industrial Estate has never even been previously mentioned;
â€¢ The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Change to Plan Defer to HAAP

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16027 - 10324 - Policy RTC6 - Hockley Town Centre - i, ii, iii

16027 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Mrs Jennifer Abbey [10324]

3 Claybrick Avenue
Hockley
Essex
SS5 4PS
UK
07768 542634

Agent: N/A

Full Text: Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary: The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Change to Plan Defer to HAAP

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16145 - 4951 - Policy RTC6 - Hockley Town Centre - i, ii, iii

16145 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Hockley Residents Association (Mr B Guyett) [4951] **Agent:** N/A

Hockley Residents Association
2 Tonbridge Road
Hockley
Essex
SS5 5HL

Full Text: Previous consultations and public opinion ignored by RDC and HAAP pre-empted:
As well as ignoring the Parish Plan and the 95% rejection rate of the HAAP proposals, the Core Strategy proposals pre-empt the next round of the HAAP.

Public opinion in Hockley is strongly against both the HAAP and Core Strategy proposals for Hockley Village Centre. A survey undertaken in October 2009 had 972 responses (over 20% of households) and the key results were:
- shops: only 5% in favour of major redevelopment (43% supported moderate redevelopment and 52% only wanted minor improvements)
- Eldon Way & Foundry Industrial Estates: just 13% wanted major change with a youth centre suggested as the most popular improvement.
- Roads: nearly 2/3rds wanted to retain a roundabout at the Spa Junction instead of traffic lights proposed by RDC.

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary: Previous consultations ignored by RDC and HAAP pre-empted:
The proposals ignore both the Parish Plan and the 95% rejection rate of respondents to RDC's own HAAP Consultation (2009), which included specific proposals for Eldon Way (but did not even mention the Foundry Industrial Estate). A survey completed by 972 residents in October 2009 also confirmed the public's rejection with only 5% in favour of redeveloping the shops and only 13% supporting redevelopment of the industrial estate.
Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Change to Plan Delete and defer to next round HAAP

Appear at exam? No **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16147 - 11793 - Policy RTC6 - Hockley Town Centre - i, ii, iii

16147 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Mr Brian Guyett [11793]

2 Tonbridge Road,
Hockley
SS55HL
United Kingdom
07736211248

Agent: N/A

Full Text:

Previous consultations and public opinion ignored by RDC and HAAP pre-empted:
As well as ignoring the Parish Plan and the 95% rejection rate of the HAAP proposals, the Core Strategy proposals pre-empt the next round of the HAAP.

Public opinion in Hockley is strongly against both the HAAP and Core Strategy proposals for Hockley Village Centre. A survey undertaken in October 2009 had 972 responses (over 20% of households) and the key results were:

- shops: only 5% in favour of major redevelopment (43% supported moderate redevelopment and 52% only wanted minor improvements)
- Eldon Way & Foundry Industrial Estates: just 13% wanted major change with a youth centre suggested as the most popular improvement.
- Roads: nearly 2/3rds wanted to retain a roundabout at the Spa Junction instead of traffic lights proposed by RDC.

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

Previous consultations ignored by RDC and HAAP pre-empted:
The proposals ignore both the Parish Plan and the 95% rejection rate of respondents to RDC's own HAAP Consultation (2009), which included specific proposals for Eldon Way (but did not even mention the Foundry Industrial Estate). A survey completed by 972 residents in October 2009 also confirmed the public's rejection with only 5% in favour of redeveloping the shops and only 13% supporting redevelopment of the industrial estate.
Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Change to Plan

Delete from CS and defer to next HAAP consultation

Appear at exam? No

Soundness Tests i, ii, iii

Core Strategy Submission Document

O - 16290 - 12098 - Policy RTC6 - Hockley Town Centre - i

16290 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Mr David Dare [12098]

1, Woodstock Crescent
Hockley Essex
SS5 4XG
UK
01702 205813

Agent: N/A

Full Text: Highway & Traffic Implications

1. Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;

* (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

* EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

3. RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local

16290 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

Summary:

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:

* The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

* The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

Previous consultations ignored by RDC:

The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Core Strategy Submission Document

16290 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Thus the proposals are not founded on a robust and credible evidence base and are unsound

7. RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

* The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

* the Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!

* The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

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Summary:

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

the Foundry Industrial Estate has never even been previously mentioned;

The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

9. PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

10. THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food

Core Strategy Submission Document

16290 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

shopping expenditure.

2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's

existing strengths, rather than retail expansion"

4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moveover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Summary:

Previous consultations ignored by RDC:

The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16292 - 12098 - Policy RTC6 - Hockley Town Centre - i

16292 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Mr David Dare [12098]

1, Woodstock Crescent
Hockley Essex
SS5 4XG
UK
01702 205813

Agent: N/A

Full Text: Highway & Traffic Implications

1. Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;

* (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

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It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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16292 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

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Summary:

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Core Strategy Submission Document

16292 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Thus the proposals are not founded on a robust and credible evidence base and are unsound

7. RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

* The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

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If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

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Whereas, the R&LS actually states:

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Core Strategy Submission Document

16292 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

shopping expenditure.

2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's

existing strengths, rather than retail expansion"

4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moveover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Core Strategy is inaccurate, misleading and unsound.

Summary:

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Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16294 - 12098 - Policy RTC6 - Hockley Town Centre - i

16294 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Mr David Dare [12098]

1, Woodstock Crescent
Hockley Essex
SS5 4XG
UK
01702 205813

Agent: N/A

Full Text: Highway & Traffic Implications

1. Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

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The site selected for the new industrial estate also contravenes PPS4 which states;

* (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

* EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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Thus the proposals are not founded on a robust and credible evidence base and are unsound

3. RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local

16294 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

Summary:

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

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5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:

* The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

* The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

Previous consultations ignored by RDC:

The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Core Strategy Submission Document

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CHAPTER 12 Policy RTC6 - Hockley Town Centre

Thus the proposals are not founded on a robust and credible evidence base and are unsound

7. RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

* The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

* the Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!

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Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

9. PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

10. THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food

Core Strategy Submission Document

16294 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

shopping expenditure.

2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's

existing strengths, rather than retail expansion"

4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moveover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

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Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16297 - 12098 - Policy RTC6 - Hockley Town Centre - i

16297 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Mr David Dare [12098]

1, Woodstock Crescent
Hockley Essex
SS5 4XG
UK
01702 205813

Agent: N/A

Full Text: Highway & Traffic Implications

1. Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;

* (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

* EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

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3. RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

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16297 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

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The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

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6. Previous consultations ignored by RDC:

* The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

* The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

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Core Strategy Submission Document

16297 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Thus the proposals are not founded on a robust and credible evidence base and are unsound

7. RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

* The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

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There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

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9. PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

10. THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food

Core Strategy Submission Document

16297 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

shopping expenditure.

2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's

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4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moveover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

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Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16307 - 14206 - Policy RTC6 - Hockley Town Centre - i

16307 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Mr D Himsley [14206]

4 Brackendale Close
Hockley
Essex
SS5 5AP

Agent: N/A

Full Text: Please find the following objections: -

10 off Unsound Reasons.
1. Highway and Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

3. RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:
The Hockley Parish Plan (dated 2007). The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

7. RDC not consulted on proposals to relocate the Eldon Way and Foundry Industrial Estates

EW; CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" absolutely no consultation on concept of moving EW businesses entirely

FIE; has never even been previously mentioned in any plan version; CS states omission was due to typing error!

Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus proposals are not founded on a robust and credible evidence base and are unsound.

8. The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

Core Strategy Submission Document

16307 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound

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does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise

residents how such changes will be made and the strategy is unsound.

10. The CS misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The CS states "The R&LS states Hockley has great potential and has a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) "does not lend itself to a food store capable of retaining a significant proportion of main food shopping expenditure.
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Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16310 - 14206 - Policy RTC6 - Hockley Town Centre - i

16310 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Mr D Himsley [14206]

4 Brackendale Close
Hockley
Essex
SS5 5AP

Agent: N/A

Full Text: Please find the following objections: -

10 off Unsound Reasons.
1. Highway and Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

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Core Strategy Submission Document

16310 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound

9. PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies"

Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which

does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise

residents how such changes will be made and the strategy is unsound.

10. The CS misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The CS states "The R&LS states Hockley has great potential and has a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) "does not lend itself to a food store capable of retaining a significant proportion of main food shopping expenditure.
- 2) "there is no immediate capacity for additional floor space."
- 3) "recommend that focus be maintained on developing Hockley's existing strengths."
- 4) " the Council may wish to consider reclassifying Hockley from a town center, to a district center".

Summary:

7. RDC not consulted on proposals to relocate the Eldon Way and Foundry Industrial Estates

EW; CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" absolutely no consultation on concept of moving EW businesses entirely

FIE; has never even been previously mentioned in any plan version; CS states omission was due to typing error!

Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus proposals are not founded on a robust and credible evidence base and are unsound.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16312 - 14206 - Policy RTC6 - Hockley Town Centre - i

16312 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Mr D Himsley [14206]

4 Brackendale Close
Hockley
Essex
SS5 5AP

Agent: N/A

Full Text: Please find the following objections: -

10 off Unsound Reasons.
1. Highway and Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

3. RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:
The Hockley Parish Plan (dated 2007). The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

7. RDC not consulted on proposals to relocate the Eldon Way and Foundry Industrial Estates

EW; CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" absolutely no consultation on concept of moving EW businesses entirely

FIE; has never even been previously mentioned in any plan version; CS states omission was due to typing error!

Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus proposals are not founded on a robust and credible evidence base and are unsound.

8. The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

Core Strategy Submission Document

16312 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound

9. PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies"

Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which

does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise

residents how such changes will be made and the strategy is unsound.

10. The CS misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The CS states "The R&LS states Hockley has great potential and has a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) "does not lend itself to a food store capable of retaining a significant proportion of main food shopping expenditure.
- 2) "there is no immediate capacity for additional floor space."
- 3) "recommend that focus be maintained on developing Hockley's existing strengths."
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Summary:

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If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16316 - 14206 - Policy RTC6 - Hockley Town Centre - i

16316 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Mr D Himsley [14206]

4 Brackendale Close
Hockley
Essex
SS5 5AP

Agent: N/A

Full Text: Please find the following objections: -

10 off Unsound Reasons.

1. Highway and Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

3. RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

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Thus the proposals are not founded on a robust and credible evidence base and are unsound

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FIE; has never even been previously mentioned in any plan version; CS states omission was due to typing error!

Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus proposals are not founded on a robust and credible evidence base and are unsound.

8. The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

Core Strategy Submission Document

16316 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

There are also inconsistencies between the Core Strategy & HAAP.

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Whereas, the R&LS actually states:

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- 4) " the Council may wish to consider reclassifying Hockley from a town center, to a district center".

Summary:

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Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16428 - 10683 - Policy RTC6 - Hockley Town Centre - i

16428 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Mr T Gleadall [10683]

2 Wood End
Hockley
Essex
SS5 4QL

Agent: N/A

Full Text: Local Development Framework Core Strategy Submission

I understand that RDC was under government instruction to come up with a Core Strategy proposal, and I believe that it has done a reasonable job in trying to satisfy each parish. However, I have 2 objections with regard to the soundness of the latest proposal in the Hockley area.

Objection

There is currently a traffic flow issue on the Hockley Road at peak times. With the additional proposed housing allocations in Rochford, Hawkwell and Hockley, and the associated increase in number of vehicles, the Spa roundabout in Hockley will become gridlocked. There is no satisfactory solution provided in the Core Strategy submission to overcome the problem of road networks. There is no inexpensive solution to the growing problem. Also, no account has been taken of the further increased traffic related to the proposed airport expansion.

Objection

The latest version of the Core Strategy proposes to relocate existing businesses from Eldon Way and Foundry Industrial Estates in Hockley to greenbelt land in the vicinity of Southend Airport, and to redevelop the estates for commercial, retail, leisure, community, and residential purposes. The number of proposed residential units is not stated independently in the proposal (although it is shown in the Hockley Town Centre Development Plan), but is reported to be 150 - 200 dwellings. The previous version of the Core Strategy did not show any additional housing in the centre of Hockley.

The Hockley Parish Plan (published October 2007) states that there should be no new large housing estates in Hockley due to insufficient infrastructure in terms of schools, healthcare, leisure facilities and road networks. It also states that there should be no loss of greenbelt or open spaces due to housing development. Both of these conditions are broken by the Eldon Way proposal.

The Parish Plan also discusses the traffic flow issues in the centre of Hockley and the approach roads from Rayleigh, Rochford and Ashingdon. The local roads are narrow and could not cope with the additional vehicles generated by 150 - 200 new dwellings in the centre of Hockley, and would be unbearable during the development period with a constant flow of construction lorries.

In a recent Resident Survey in Hockley, completed in October 2009, with reference to Hockley Centre Redevelopment, 87% of responses were against moving businesses out of Eldon Way to make way for major redevelopment, and if redevelopment was enforced, the least favoured type of development was shown to be residential units with just over 1% of response support.

Summary:

Objection

The latest version of the Core Strategy proposes to relocate existing businesses from Eldon Way and Foundry Industrial Estates in Hockley to greenbelt land in the vicinity of Southend Airport, and to redevelop the estates for commercial, retail, leisure, community, and residential purposes. The number of proposed residential units is not stated independently in the proposal (although it is shown in the Hockley Town Centre Development Plan), but is reported to be 150 - 200 dwellings. The previous version of the Core Strategy did not show any additional housing in the centre of Hockley.

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In a recent Resident Survey in Hockley, completed in October 2009, with reference to Hockley Centre Redevelopment, 87% of responses were against moving businesses out of Eldon Way to make way for major redevelopment, and if redevelopment was enforced, the least favoured type of development was shown to be residential units with just over 1% of response support.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16435 - 13749 - Policy RTC6 - Hockley Town Centre - i

16435 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Joan and Phil Smith [13749]

46 Woodpond Avenue
Hockley
Essex
SS5 4PX

Agent: N/A

Full Text: Re: Core Strategy for Hockley Redevelopment

I object to the Core Strategy for the following reasons;

You are ignoring the views of the local residents, who have overwhelmingly stated via the Hockley Parish Plan that they do not want any large-scale housing development in Hockley, but if there has to be some additional housing, there must be no loss of greenbelt or open spaces and any developments must be matched by the appropriate levels of infrastructure.

Our village needs improvements to build on what we have now rather than a long drawn out proposal, which, by the time it is agreed and completed will have seen Hockley become just a huge housing estate without a thriving centre, because many local businesses will have disappeared due to the dreadfully inadequate transport links.

Our roads simply cannot cope with the existing traffic volumes let alone the massive increase in traffic, which will result from the relocation of businesses and numerous housing developments.

Our village is surrounded by some of the most beautiful countryside in the district which we do not want to see disappear forever.

Listed below are some of the technical points as to why I object to the Core Strategy and why I believe it to be inaccurate, misleading and unsound.

By proposing to move employment at Hockley's two business estates to a green field site near the airport, which has no existing public transport links and being 2-3 miles from the nearest railway station, is contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions by placing a reliance on car transport as a means of getting to work.

Though RDC are proposing to upgrade the nearest road to a dual carriageway, the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway. This road is already horrendously busy and virtually grid locked at peak times, so this is quite unbelievable that with the predicted expansion of the airport and new industrial estate, there is no provision for the improvement of the B1013 through Hockley. The proposed development of the business estates for housing (and additional housing proposed for Hawkwell) also means an increase in the volume of traffic in the Hockley area with no provision for improvement or expansion to cope with the higher volume.

The site selected for the new industrial estate contravenes PPS4, which states that for "out-of-centre sites, preference is given to sites which are or will be well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car and which are close to the centre and have a high likelihood of forming links with the centre. As there is no existing public transport, there is no obvious likelihood of forming links with any existing centres. In addition, because of its remote location, accessed by the narrow, busy B1013; it is not suitable for access by cycle or on foot.

It also contravenes PPS1, which states reducing the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

PPS12 4.9 states the infrastructure planning process should identify, as far as possible: infrastructure needs and costs. Neither needs nor, especially, costs have been identified. The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

16435 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned. No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation. Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. There no cross-referencing between concurrent plans affecting the exact same piece of land.

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent, which HAAP will need to follow, and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. It states "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floor space".

What the R&LS actually states is:

- 1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.
- 2) (10.28) "There is no immediate capacity for additional floor space."
- 3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion"
- 4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Invest in what we already have rather than forcing upon us something none of us have asked for. Most people would agree that Hockley needs a facelift but it does not need changing beyond all recognition. This strategy does not propose to deal with the issues that affect this area now, and does not propose to deal with these same issues that will be exacerbated further by the proposals that are being made. Attached are some ideas for relatively quickly achievable solutions, which would enhance the village and deal with some of the traffic problems, without losing "Hockley". We live here because we like it - if we didn't we would have moved!

Make the Spa Pub the roundabout, which would greatly reduce the junction exit combinations that exist at the current mini roundabout.

Traffic will still be able to flow when the brewery lorry parks up - it is very dangerous trying to manoeuvre round it onto that mini roundabout, as you cannot see vehicles coming the other way.

Core Strategy Submission Document

16435 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Hockley Ideas:

Demolish the "Alldays" building and use that space to create the "village square", which could be landscaped or used in the way the Rayleigh Market car park is used - farmers markets, market days, parking on non market days. This would maintain the existing focal point of Hockley, the High Street, therefore not being detrimental to the shops on the other side of the road. It would also provide a possible link to the Leisure facilities in Eldon Way.

Summary:

The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation. Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. There no cross-referencing between concurrent plans affecting the exact same piece of land.

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent, which HAAP will need to follow, and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

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Invest in what we already have rather than forcing upon us something none of us have asked for. Most people would agree that Hockley needs a facelift but it does not need changing beyond all recognition. This strategy does not propose to deal with the issues that affect this area now, and does not propose to deal with these same issues that will be exacerbated further by the proposals that are being made. Attached are some ideas for relatively quickly achievable solutions, which would enhance the village and deal with some of the traffic problems, without losing "Hockley". We live here because we like it - if we didn't we would have moved!

Change to Plan

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Traffic will still be able to flow when the brewery lorry parks up - it is very dangerous trying to manoeuvre round it onto that mini roundabout, as you cannot see vehicles coming the other way.

Demolish the "Alldays" building and use that space to create the "village square", which could be landscaped or used in the way the Rayleigh Market car park is used - farmers markets, market days, parking on non market days. This would maintain the existing focal point of Hockley, the High Street, therefore not being detrimental to the shops on the other side of the road. It would also provide a possible link to the Leisure facilities in Eldon Way.

Core Strategy Submission Document

O - 16435 - 13749 - Policy RTC6 - Hockley Town Centre - i

16435 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16446 - 14218 - Policy RTC6 - Hockley Town Centre - i

16446 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Barbara Havey [14218]

71 Main Road
Hockley
Essex
SS5 4RG

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.
â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

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It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is

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Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

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THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

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Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

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CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Barbara Havey [14218]

71 Main Road
Hockley
Essex
SS5 4RG

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.
â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

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Change to Plan

Appear at exam? Not Specified

Soundness Tests i

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CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Barbara Havey [14218]

71 Main Road
Hockley
Essex
SS5 4RG

Agent: N/A

Full Text:

Highway & Traffic Implications

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CHAPTER 12 Policy RTC6 - Hockley Town Centre

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â€¢ The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely
â€¢ the Foundry Industrial Estate has never even been previously mentioned;
â€¢ The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.
 - 2) (10.28) "There is no immediate capacity for additional floor space."
 - 3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion"
 - 4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".
- The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

Summary:

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

Core Strategy Submission Document

O - 16450 - 14218 - Policy RTC6 - Hockley Town Centre - i

16450 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Change to Plan

Appear at exam? Not Specified Soundness Tests i

Core Strategy Submission Document

O - 16453 - 14218 - Policy RTC6 - Hockley Town Centre - i

16453 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Barbara Havey [14218]

71 Main Road
Hockley
Essex
SS5 4RG

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.
â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound
RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is

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also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

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SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

Previous consultations ignored by RDC:

â€¢ The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

â€¢ The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

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â€¢ The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely
â€¢ the Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!

â€¢ The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Summary:

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O - 16453 - 14218 - Policy RTC6 - Hockley Town Centre - i

16453 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates
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Summary:

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PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.
 - 2) (10.28) "There is no immediate capacity for additional floor space."
 - 3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion"
 - 4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".
- The Core Strategy is inaccurate, misleading and unsound.

Summary:

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Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16491 - 9646 - Policy RTC6 - Hockley Town Centre - i

16491 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Mrs Margaret Christian [9646]

41 Westminster Drive
Hockley
Essex
SS5 4XD
01702 204320

Agent: N/A

Full Text: Please find enclosed my objection to the Core Strategy Submission DPD. Please kindly acknowledge receipt of this objection and duly register it.

Objections to RDC's Core Strategy Submission DPD

Reason Unsound

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus service are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

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It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

3. RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

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The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

16491 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs not, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. Thus it is unclear if use of Standard Charges is financially viable.

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The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:

The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

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The Foundry Industrial Estates has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy acknowledges this omission was due to a typing error!

The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

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Neither the Core Strategy or Hockley Area Action Plan (HAAP) defines its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

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9. PPS12, 4.6, states that Cores Strategies show be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which do not indicate how such applications will be handled and does not comply with

Core Strategy Submission Document

16491 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

10. The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

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Summary:

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Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16493 - 9646 - Policy RTC6 - Hockley Town Centre - i

16493 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Mrs Margaret Christian [9646]

41 Westminster Drive
Hockley
Essex
SS5 4XD
01702 204320

Agent: N/A

Full Text: Please find enclosed my objection to the Core Strategy Submission DPD. Please kindly acknowledge receipt of this objection and duly register it.

Objections to RDC's Core Strategy Submission DPD

Reason Unsound

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

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It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

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16493 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs not, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. Thus it is unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of address the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:

The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

7. RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

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8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing HAAP consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy or Hockley Area Action Plan (HAAP) defines its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

9. PPS12, 4.6, states that Cores Strategies show be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which do not indicate how such applications will be handled and does not comply with

Core Strategy Submission Document

16493 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

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The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

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2) (10.28) "There is no immediate capacity for additional floor space."

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The Core Strategy is inaccurate, misleading and unsound.

Summary:

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Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16495 - 9646 - Policy RTC6 - Hockley Town Centre - i

16495 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Mrs Margaret Christian [9646]

41 Westminster Drive
Hockley
Essex
SS5 4XD
01702 204320

Agent: N/A

Full Text: Please find enclosed my objection to the Core Strategy Submission DPD. Please kindly acknowledge receipt of this objection and duly register it.

Objections to RDC's Core Strategy Submission DPD

Reason Unsound

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus service are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

3. RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

16495 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

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Core Strategy Submission Document

O - 16495 - 9646 - Policy RTC6 - Hockley Town Centre - i

16495 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

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Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16498 - 9646 - Policy RTC6 - Hockley Town Centre - i

16498 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Mrs Margaret Christian [9646]

41 Westminster Drive
Hockley
Essex
SS5 4XD
01702 204320

Agent: N/A

Full Text: Please find enclosed my objection to the Core Strategy Submission DPD. Please kindly acknowledge receipt of this objection and duly register it.

Objections to RDC's Core Strategy Submission DPD

Reason Unsound

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16498 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

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Core Strategy Submission Document

16498 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

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The Core Strategy is inaccurate, misleading and unsound.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16533 - 13921 - Policy RTC6 - Hockley Town Centre - i

16533 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Ms H Rozga [13921]

56A Aldermans Hill
Hockley
Essex
SS5 4RW

Agent: N/A

Full Text:

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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16533 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Summary:

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16533 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

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O - 16533 - 13921 - Policy RTC6 - Hockley Town Centre - i

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Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16535 - 13921 - Policy RTC6 - Hockley Town Centre - i

16535 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Ms H Rozga [13921]

56A Aldermans Hill
Hockley
Essex
SS5 4RW

Agent: N/A

Full Text:

1. Highway & Traffic Implications

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However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

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It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

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It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

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16535 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

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Core Strategy Submission Document

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Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16537 - 13921 - Policy RTC6 - Hockley Town Centre - i

16537 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Ms H Rozga [13921]

56A Aldermans Hill
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Essex
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Agent: N/A

Full Text:

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CHAPTER 12 Policy RTC6 - Hockley Town Centre

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CHAPTER 12 Policy RTC6 - Hockley Town Centre

Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) "the Council may wish to consider reclassifying Hockley from a town centre to a district centre.

Summary: The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

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O - 16540 - 13921 - Policy RTC6 - Hockley Town Centre - i

16540 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Ms H Rozga [13921]

56A Aldermans Hill
Hockley
Essex
SS5 4RW

Agent: N/A

Full Text:

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus service are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

3. RCD are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

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CHAPTER 12 Policy RTC6 - Hockley Town Centre

Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts.

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4. PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. Thus it is unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of address the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

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PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

5. SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

6. Previous consultations ignored by RDC:

The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

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Thus the proposals are not founded on a robust and credible evidence base and are unsound.

7. RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates.

The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely.

The Foundry Industrial Estates has never even been previously mentioned in any plan version; A recent amendment to

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the Core Strategy acknowledges this omission was due to a typing error!

The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

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The Foundry Industrial Estate has never even been previously mentioned.

The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate.

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

8. Eldon Way and Foundry Industrial Estates form a significant part of the ongoing HAAP consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy or Hockley Area Action Plan (HAAP) defines its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

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9. PPS12, 4.6, states that Cores Strategies show be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which do not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

10. The Core Strategy misrepresent the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.

2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion".

4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6.

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Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

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Summary:

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Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16551 - 13667 - Policy RTC6 - Hockley Town Centre - i

16551 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: G and S Cooke [13667]

56 Aldermans Hill
Hockley
Essex
SS5 4RW

Agent: N/A

Full Text:

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus service are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

Summary:

Proposals for moving employment to of town locations, at either end of the district, with no existing public transport inks, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

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the Core Strategy can be delivered."

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CHAPTER 12 Policy RTC6 - Hockley Town Centre

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The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely.

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Summary

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1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.

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2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion".

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Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16553 - 13667 - Policy RTC6 - Hockley Town Centre - i

16553 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: G and S Cooke [13667]

56 Aldermans Hill
Hockley
Essex
SS5 4RW

Agent: N/A

Full Text:

1. Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

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It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

Summary:

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CHAPTER 12 Policy RTC6 - Hockley Town Centre

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Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

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CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: G and S Cooke [13667]

56 Aldermans Hill
Hockley
Essex
SS5 4RW

Agent: N/A

Full Text:

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Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus service are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states:

(EC7.3C) "out-of-centre site, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

Summary:

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The Core Strategy also contravenes its own policy T1 and is unsound.

2. The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

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Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

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O - 16558 - 13667 - Policy RTC6 - Hockley Town Centre - i

16558 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: G and S Cooke [13667]

56 Aldermans Hill
Hockley
Essex
SS5 4RW

Agent: N/A

Full Text:

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CHAPTER 12 Policy RTC6 - Hockley Town Centre

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There are also inconsistencies between the Core Strategy & HAAP.

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9. PPS12, 4.6, states that Cores Strategies show be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which do not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

10. The Core Strategy misrepresent the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.

Core Strategy Submission Document

O - 16558 - 13667 - Policy RTC6 - Hockley Town Centre - i

16558 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

2) (10.28) "There is no immediate capacity for additional floor space."

3) (10.29) "we recommend that focus be maintained on developing Hockley's existing strengths, rather than retail expansion".

4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) "the Council may wish to consider reclassifying Hockley from a town centre to a district centre.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) "the Council may wish to consider reclassifying Hockley from a town centre to a district centre.

Change to Plan

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16566 - 12027 - Policy RTC6 - Hockley Town Centre - i, ii

16566 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: mrs vivienne white [12027]

5 claybrick avenue
hockley
essex
ss5 4ps
01702205283

Agent: N/A

Full Text: Public Consultation on the Rochford District Council Core Strategy.

In my opinion the Core Strategy Submission Document does not go far enough to explain and justify the proposals that it contains. It fails to clearly set out responsibilities, timescales and risks involved in delivering its objectives, particularly on key infrastructure requirements. It provides little detail on how its objectives can be achieved and the costs involved. It fails to offer alternatives to its preferred options and has taken little notice of previous consultations and public opinion. As advised, my detailed comments are based only on issues of soundness and legal compliance.

1.Highway & Traffic

The Core Strategy proposes to relocate two small industrial estates in Hockley to a new and as yet unbuilt greenfield site near to Southend Airport. This proposal to move employment to out of town locations with no existing public transport links, are contrary to government policy PPG4. This proposal also goes against the Core Strategy's aims of reducing carbon emissions; reliance on car transport and providing a network of cycle paths. This site is not served by a choice of means of transport, nor is it close to the centre, nor is it suitable for access by cycle or on foot. Therefore, it contravenes PPS4.

As a consequence of moving the above industrial sites from the centre of Hockley, the Core Strategy has proposed a mixed redevelopment including up to 200 residential buildings. However, there has been no re-evaluation of transport needs. ECC Highways have confirmed that the B1013 is running at 72% of its theoretical maximum capacity and the effect of extra housing in Hockley and several other areas within a close proximity will put extra strain upon an already over stretched road system.

The combined strategy of moving industrial sites out of town, scattering housing across the district without detailed consideration for transport needs, funding, ability to deliver is concerning. It is clear that the extent of improvements required and the lack of details as to how this can be achieved and how it can be funded makes this proposal unsound.

Consultation.

Previous consultations have not been fairly considered by Rochford District Council.

The Hockley Parish Plan, 2007, clearly states that residents are strongly against any large scale housing development in Hockley. It also stated that any development must be matched by appropriate levels of infrastructure improvements. The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Action Plan(HAAP) Consultation (2009) which do include specific proposals for Eldon Way, however, do not mention the a joining Foundry Estate.

Eldon Way and Foundry Industrial Estates form a significant element of the ongoing Hockley Area Action Plan (HAAP) consultation but, the Core Strategy proposals pre-empts the next stage of this consultation. There has been no cross reference between concurrent plans affecting the same bit of land. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a 'village green, introducing a significant area of public open space' You would think that we are talking about a large tract of land with unlimited space, not a fairly small industrial estate that has a great deal of support from both businesses and residents of Hockley and a strong rejection to redevelopment.

Should a decision be made as part of the Core Strategy to relocate all these businesses it will set a legal precedent which HAAP will have to follow and renders the next consultation stage of HAAP redundant. Given the response to previous consultations, the inconsistencies between HAAP and the Core Strategy, the current proposals are both undemocratic and unsound.

Summary: 1.Highway & Traffic

The Core Strategy proposes to relocate two small industrial estates in Hockley to a new and as yet unbuilt greenfield site near to Southend Airport. This proposal to move employment to out of town locations with no existing public transport links, are contrary to government policy PPG4. This proposal also goes against the Core Strategy's aims of reducing carbon emissions; reliance on car transport and providing a network of cycle paths. This site is not served by a choice of means of transport, nor is it close to the centre, nor is it suitable for access by cycle or on foot. Therefore, it contravenes PPS4.

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Core Strategy Submission Document

O - 16566 - 12027 - Policy RTC6 - Hockley Town Centre - i, ii

16566 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

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Change to Plan

Appear at exam? Not Specified **Soundness Tests** i, ii

Core Strategy Submission Document

O - 16584 - 14231 - Policy RTC6 - Hockley Town Centre - i

16584 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Heather Wakefield [14231]

Not provided

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighboring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.
â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

16584 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modeling has been undertaken to determine the impacts

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PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

Summary:

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

Previous consultations ignored by RDC:

• The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

• The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

Summary:

Previous consultations ignored by RDC:

The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

• The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

• the Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!

• The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

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Core Strategy Submission Document

16584 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

â€¢ the Foundry Industrial Estate has never even been previously mentioned;
â€¢ The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

If a decision is taken as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

PPS12, 4.6, states that Cores Strategies should be flexible and "should be able to show how they will handle contingencies". Several large planning applications have already been submitted to RDC proposing developments outside the Core Strategy which does not indicate how such applications will be handled and does not comply with PPS12. Neither have RDC been able to advise residents how such changes will be made and the strategy is unsound.

THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.
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- The Core Strategy is inaccurate, misleading and unsound.

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Summary:

Summary:

Previous consultations ignored by RDC:

The proposals ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound

Change to Plan

Core Strategy Submission Document

O - 16584 - 14231 - Policy RTC6 - Hockley Town Centre - i

16584 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16586 - 14231 - Policy RTC6 - Hockley Town Centre - i

16586 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Heather Wakefield [14231]

Not provided

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighboring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.
â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

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It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

16586 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Summary:

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modeling has been undertaken to determine the impacts

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• The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

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RDC have not consulted on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates

• The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

• the Foundry Industrial Estate has never even been previously mentioned in any plan version; A recent amendment to the Core Strategy states this omission was due to a typing error!

• The Urban Capacity study stated a "low probability" of housing and did not even mention the Foundry Estate

Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

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Core Strategy Submission Document

O - 16586 - 14231 - Policy RTC6 - Hockley Town Centre - i

16586 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

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If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

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â€¢ The previous CS Strategy stated "we will look at opportunities for more valuable and appropriate uses of the industrial land" with absolutely no consultation at all on concept of moving existing EW businesses entirely

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Thus the proposals are they are not founded on a robust and credible

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16586 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

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Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16588 - 14231 - Policy RTC6 - Hockley Town Centre - i

16588 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Heather Wakefield [14231]

Not provided

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighboring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.
â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

16588 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

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PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

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Previous consultations ignored by RDC:

• The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

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16588 Object

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16588 Object

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Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

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O - 16591 - 14231 - Policy RTC6 - Hockley Town Centre - i

16591 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Heather Wakefield [14231]

Not provided

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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CHAPTER 12 Policy RTC6 - Hockley Town Centre

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16591 Object

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Change to Plan

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

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16591 Object

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Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16601 - 14232 - Policy RTC6 - Hockley Town Centre - i

16601 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Roger Wakefield [14232]

Not provided

SS5 4UX

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighboring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
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It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

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The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Core Strategy Submission Document

16601 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Summary:

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PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

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• The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

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Core Strategy Submission Document

16601 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

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Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

Summary:

The Core Strategy proposals pre-empt the next stage of the HAAP consultation and neither defines its status relevant to the other plan and subsequent priorities.

There are also inconsistencies between the Core Strategy & HAAP.

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THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.
 - 2) (10.28) "There is no immediate capacity for additional floor space."
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 - 4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".
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Change to Plan

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

Core Strategy Submission Document

O - 16601 - 14232 - Policy RTC6 - Hockley Town Centre - i

16601 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

O - 16603 - 14232 - Policy RTC6 - Hockley Town Centre - i

16603 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Roger Wakefield [14232]

Not provided

SS5 4UX

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

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However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighboring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states; "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.

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Summary:

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16603 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

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Core Strategy Submission Document

O - 16603 - 14232 - Policy RTC6 - Hockley Town Centre - i

16603 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

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Core Strategy Submission Document

O - 16603 - 14232 - Policy RTC6 - Hockley Town Centre - i

16603 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

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Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16605 - 14232 - Policy RTC6 - Hockley Town Centre - i

16605 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Roger Wakefield [14232]

Not provided

SS5 4UX

Agent: N/A

Full Text:

Highway & Traffic Implications

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CHAPTER 12 Policy RTC6 - Hockley Town Centre

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The concept of paying for improvements through use of Standard Charges is totally unproven and unsound.

Summary:

PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

SERT is put forward as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "potential" to do so in the future. SERT is not realistic or reliable a solution and the proposal is therefore unsound.

Previous consultations ignored by RDC:

• The Hockley Parish Plan (dated 2007), clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure.

• The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (although HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

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Core Strategy Submission Document

16605 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

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Thus the proposals are they are not founded on a robust and credible evidence base and are unsound.

Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy & HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant. Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

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THE Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008.

The Core Strategy states (12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace".

Whereas, the R&LS actually states:

- 1) (10.26) "the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure.
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 - 4) 10.31 "The current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre".
- The Core Strategy is inaccurate, misleading and unsound.

Summary:

The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008. The Core Strategy states "The Retail & Leisure Study states Hockley has great potential and has a need for additional convenience floorspace". Whereas, the R&LS states: 1) "does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure. 2) "There is no immediate capacity for additional floor space." 3) "we recommend that focus be maintained on developing Hockley's existing strengths." 4) " the Council may wish to consider reclassifying Hockley from a town centre to a district centre".

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Core Strategy Submission Document

O - 16605 - 14232 - Policy RTC6 - Hockley Town Centre - i

16605 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

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Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

O - 16608 - 14232 - Policy RTC6 - Hockley Town Centre - i

16608 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Roger Wakefield [14232]

Not provided

SS5 4UX

Agent: N/A

Full Text:

Highway & Traffic Implications

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and the two estates are adjacent to the railway station. Bus services are poor with just 3* an hour (following a recent 50% reduction in services) and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. (* one of the 3 services is paid for by ECC on a 6 mth trial and may be terminated in the new year).

However, the Core Strategy proposes to relocate these two estates to a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways stats). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighboring Southend Airport, as well as the new industrial estate.

The site selected for the new industrial estate also contravenes PPS4 which states;
â€¢ (EC7.3C) "out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre. There is no existing public transport and no obvious likelihood of forming links with any existing centres.
â€¢ EC7.5 1 "whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car". Its remote location. Accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

The Core Strategy also contravenes its own policy T1 and is unsound.

Summary:

Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG4 & PPS1. It also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths".

The Core Strategy also contravenes its own policy T1 and is unsound.

The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the Eldon Way & Foundry Industrial Estates. ECC Highways have confirmed that the B1013 is running at 72% of its maximum theoretical capacity) and the effect of extra housing in Hockley (as well as Hawkwell) has not been re-evaluated and it is unclear what improvements will be required and whether they can be physically achieved.

Thus the proposals are not founded on a robust and credible evidence base and are unsound

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. The "Core Strategy" is not a strategy but simply a collection of disparate sites. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

"Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy can be delivered."

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. It is also clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

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O - 16608 - 14232 - Policy RTC6 - Hockley Town Centre - i

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CHAPTER 12 Policy RTC6 - Hockley Town Centre

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PPS12 4.9 states "The infrastructure planning process should identify, as far as possible: infrastructure needs and costs". Neither needs nor, especially, costs have been identified and the Core Strategy is therefore unsound.

The district's highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Lane, which has a single track, traffic light controlled railway bridge. 1200 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end. The cost of addressing the railway bridge bottleneck will be significant but is not mentioned.

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Core Strategy Submission Document

16608 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

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Change to Plan

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

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O - 16608 - 14232 - Policy RTC6 - Hockley Town Centre - i

16608 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Appear at exam? Not Specified

Soundness Tests i

Core Strategy Submission Document

S - 16695 - 9072 - Policy RTC6 - Hockley Town Centre - None

16695 Support

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Essex County Council (Mr Roy Lewis) [9072]

Agent: N/A

Essex County Council
ESH - Spatial Planning
Planning and Transport
County Hall
Chelmsford
CM1 4JU
01245-437578

Full Text: ROCHFORD CORE STRATEGY SUBMISSION DOCUMENT, SEPTEMBER 2009
RESPONSE OF ESSEX COUNTY COUNCIL

1. General Comment

Essex County Council welcomes and broadly supports the Core Strategy prepared by Rochford District Council. The Strategy contains policies and proposals that address the spatial characteristics, issues and opportunities facing the District whilst respecting the distinctive qualities of the different settlements and parts of the District.

The County Council fully supports the maintenance of a strong policy approach to protection of the Green Belt and of the quality of environmental assets in the District whilst making adequate housing and employment provision within the District. The Core Strategy presents an approach that emphasises a balance of opportunity through the District and recognition of emerging economic prospects in the District and neighbouring areas. The intended preparation of more detailed Action Area Plans for London Southend Airport and its environs and for each of the three town centres of Rayleigh, Rochford and Hockley will further enhance the approach of the Core Strategy. The emphasis on the three town centres is particularly welcomed as offering a stimulus to improvement in the services and facilities available locally within the District whilst also affording possibilities of increased community focus.

2. Housing Distribution and Locations

The East of England Plan requires Rochford to provide a minimum of 3,790 additional dwellings between 2006 and 2021. In addition, provision for a further 1,000 dwellings should be made between 2021 and 2025 to ensure delivery of housing for at least 15 years from adoption of the Core Strategy (expected in 2010). Of this total requirement the District Council has identified a capacity of 2,000 dwellings through a Strategic Housing Land Availability Assessment. This means that the Core Strategy has to identify locations for about 1,750 dwellings to be delivered before 2021 and a further 1,000 dwellings between 2021 and 2025.

Policy H1 (The efficient use of land for housing) is supported. However, prioritisation of the reuse of previously developed land within settlements for additional housing is unlikely to provide a sufficient source of provision due to the generally residential nature of existing settlements in the district and the absence of potentially large sites of previously developed land. The assessment of potential for additional housing provision within settlements already includes the proposed re-allocation to substantially residential use of 4 existing employment areas.

Within Policy H2 (Extensions to residential envelopes and phasing) and Policy H3 (Extension to residential envelopes post-2021) the District Council has adopted a balanced approach to the distribution of additional housing locations, which is based on identification of tiers of settlements defined by reference to their accessibility to jobs, services and facilities (some of which lie outside the District) and the need to protect the valued environments within the District. This approach is generally supported, although implementation and delivery of individual schemes should give further thought to securing sustainable functional relationships between proposed development locations and availability of jobs, services and facilities.

The proposed scale and phasing of development at each of the identified locations in Policy H2 and Policy H3 should be capable of being supported by County Council service groups, provided that adequate and timely funding is available. The County Council would wish to work with the District Council to ensure that future infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

3. Economic Development

The approach to Employment Growth (Policy ED1) is supported. Given the economic structure of Rochford District the support to be given to protection and enhancement of the role of small and medium sized businesses; enhancement of the District's commercial centres; and development of a skills training academy is particularly welcome. These measures will assist in building on the existing economic resource of the District.

Proposals for the comprehensive development of London Southend Airport and its environs (Policy ED2) are supported.

Core Strategy Submission Document

S - 16695 - 9072 - Policy RTC6 - Hockley Town Centre - None

16695 Support

CHAPTER 12 Policy RTC6 - Hockley Town Centre

The further elaboration of proposals through an Area Action Plan will provide a firm foundation to realise the economic regeneration and growth opportunities presented by effective use of the Airport. The recognition of the potential environmental impact of the Airport and the commitment to work to mitigate any adverse impacts on the environment and local amenities is fully supported.

The location of the proposed Eco-Enterprise Centre to the North of London Southend Airport (Policy ED4) is supported. Creation of the Centre would assist reduction of the rate of business start-up failure in the district. Further the proposed location for the Centre would afford a clear offer to businesses within an area of varied business activity.

The continued protection and enhancement of existing employment land (Policy ED3) is supported, as is the identification of 4 existing employment sites for appropriate alternative, substantially residential, uses. Each of the 4 sites affords particular issues and opportunities whereby their redevelopment for other uses and relocation of existing occupiers would confer advantage for the immediately neighbouring areas and for the District as a whole.

4. Town Centres

The town centres of Rayleigh, Rochford and Hockley, and future plans for them, are closely linked to the economic development of the District but also present the opportunity to offer greater community focus within the District. The varied approach being taken to each of these town centres is supported (Policy RTC4, RTC5 and RTC6), notably the recognition of the role and purpose of the town centres beyond retail uses.

The contribution that the County Library service could make to plans for the town centres should not be overlooked. The 5 libraries in the District are substantial footfall draws in their localities and act as a 'community anchor store'. This has knock-on effects in encouraging use of neighbouring retail and service facilities. Further the Library service is currently looking at co-location opportunities for other services within the libraries which would enable them to act as a community focus.

5. Transport

The transport aspects of the Core Strategy are well balanced in identifying potential measures that would meet the needs of existing residents and businesses in the District as well as needs arising from future development. The approach reflects and makes good reference to the transportation aspirations of the County Council. The policy emphasis on close working between the District Council and the County Council to advance the transport aspirations is welcomed and fully supported.

In relation to parking standards (Policy T8 and Paragraph 10.30) the review undertaken by Essex County Council in conjunction with the Essex Planning Officers Association has now been completed. Revised parking standards have been agreed and signed off as County Supplementary Guidance, in accordance with PPS12, and is being applied by the County Council as Local Highways Authority.

6. Coastal Protection Belt

Policy ENV2 (Coastal Protection Belt) is not supported because in its current form it is not a suitable or effective replacement policy for Policy CC1 of the Replacement Structure Plan. Structure Plan Policy CC1 (The Undeveloped Coast - Coastal Protection Belt) currently remains a 'saved' policy of the Essex and Southend-on-Sea Replacement Structure Plan, April 2001 (following a direction of the Secretary of State, dated 27th September 2007, under paragraph 1(3) of Schedule 8 to the Planning and Compulsory Purchase Act 2004). The existing Policy CC1 reads, 'Within the Coastal Protection Belt defined in adopted local plans there shall be the most stringent restrictions on development within the rural and undeveloped coastline situated outside existing built-up areas, and any development which is exceptionally permitted within this Belt shall not adversely affect the open and rural character, historic features or wildlife.'

Core Strategy Policy ENV2 should be revised to include specific reference to,

- * Definition of the boundary of the Coastal Protection Belt in another Development Plan Document;
- * the application of the most stringent restrictions on development within the rural and undeveloped coastline;
- * any development exceptionally permitted not adversely affecting the open and rural character, historic features or wildlife.

7. Historic Environment

The importance of the historic environment in Rochford District is clearly identified within the Core Strategy document. Nevertheless, the policy guidance could be usefully enhanced to promote consideration and enhancement of the historic environment and use of the historic environment to shape place. This would be achieved by the following amendments to the Core Strategy,

- * Policy ENV1 (Protection and Enhancement of the Natural Landscape and Habitats and the Protection of Historical and Archaeological Sites) should be amended by deletion of the final sentence and its replacement with, The Council is committed to the protection, promotion and enhancement of the diverse historic landscape and extensive surviving archaeological deposits of the District.

Core Strategy Submission Document

S - 16695 - 9072 - Policy RTC6 - Hockley Town Centre - None

16695 Support

CHAPTER 12 Policy RTC6 - Hockley Town Centre

* Paragraph 8.15 of the supporting text should be amended to better support the suggested amendment to Policy ENV1. The existing text of Paragraph 8.15 should be deleted in its entirety and replaced by,
The historic environment of Rochford District has developed through a history of human activity that spans over 450,000 years. Much of the resource lies hidden beneath the ground in the form of archaeological deposits. Other elements such as the historic landscape, the pattern of field, farms, woods and grazing marsh which characterise the District, are a highly visible record of millennia of agriculture, industry and commerce. Of particular significance are the coastal, island and estuarine areas where multi-period landscapes reflecting the exploitation of coastal and marshland resource survive. The District also includes the important historic medieval market towns of Rochford and Rayleigh.

* Page 16 (Sustainable Community Strategy Priority: Promoting a Greener District) should be amended to further support the approach to the Historic Environment. The fourth bullet of the Key Section/Policies of the Core Strategy should be amended to include the word 'historic', so that the first sentence of the bullet would read,
The Environment chapter seeks to protect and enhance the biodiversity, historic and natural environment of the District by protecting sites of local, national and international importance.

8. Community Infrastructure

The approach to Community Infrastructure is supported. The County Council would wish to work with the District Council to ensure that future community infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

In addition, it should be noted that,

* Some County Council services are not highly visible despite being regarded as highly desirable community services by local residents. The need to ensure adequate funding and contributions to enable these services to meet community expectations should be recognised and acknowledged in consideration of planning obligations and standard charges.

* The Adult Community Learning Centre at Rocheway, Rochford could be better located with regard to the wider Rochford/Castle Point area of service. Relocation of the Centre could provide opportunities both at the new location and for the current site.

* The Core Strategy should make specific reference to,

o Appendix H1, Location at South Canewdon: new Early Years and Childcare facilities;

o Policy CLT2, final sentence: insert after the words 'primary schools' the words 'and Early Years and Childcare facilities';

o Appendix CLT1, Other issues/comment: for Early years and childcare facilities add 'Land to be allocated within new residential areas, as appropriate'.

9. Implementation, Delivery and Monitoring

The inclusion in the Core Strategy of a section considering Implementation, Delivery and Monitoring is welcomed and supported. Nevertheless, the District Council, in moving towards implementation and delivery of the individual elements of the Core Strategy, should highlight those schemes and projects that are critical to achievement of other aspects of the Strategy.

Further, the monitoring proposal for Policy H6 (Lifetime Homes) and for Policy CP1 (Design) should be amended,

* Policy H6 (Lifetime Homes) - the identified monitoring tool is Core Indicator H6 Housing Quality Building for Life Assessments. The Building for Life Assessment methodology was devised to measure the overall design/layout quality of housing developments. It was not devised to measure compliance with Lifetime Homes, which is largely, but not exclusively, concerned with internal space standards and the provision of internal arrangements within dwellings to meet needs of all residents.

* Policy CP1 (Design) - the monitoring indicator proposed by the Core Strategy is not supported because it is unclear what the indicator would actually be measuring. The proposed indicator should be replaced by the Core Indicator, Housing Quality - Building for Life Assessments, as suggested by the County Council in its response to the Core Strategy Preferred Options, October 2008. A better approach would be to base evaluation and monitoring of Policy CP1 on the Commission for Architecture and the Built Environment's (CABE) 20 Building for Life principles, particularly as Government has endorsed these principles and is urging local authorities to use them to assess design quality. It is suggested that the monitoring arrangements for Preferred Option CP1 be deleted and replaced by the following text, 'The success of the implementation of this policy will be monitored by assessing schemes, or an appropriate sample of schemes, against the Commission for Architecture and the Built Environment's (CABE) Building for Life principles.'

10. Access to Housing

The Core Strategy notes the higher prevalence of older people in Rochford District and the need to support them. However, a more broadly based approach to access to housing should be adopted by Policies H4, H5 and H6. It should recognise the presence of other vulnerable adults in the community, for example, those with learning or mental health disability, and the range of possible forms of accommodation, including supported, sheltered and extra care accommodation. The high level of owner occupation in the District further emphasises the need for a broader approach. The emphasis on Lifetime Homes would not address the variety of future needs, whilst the potential exemptions to the

Core Strategy Submission Document

S - 16695 - 9072 - Policy RTC6 - Hockley Town Centre - None

16695 Support

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Summary: Lifetime Homes policy standard in Policy H6 are likely to act against demographic trends.
Town Centres

The town centres of Rayleigh, Rochford and Hockley, and future plans for them, are closely linked to the economic development of the District but also present the opportunity to offer greater community focus within the District. The varied approach being taken to each of these town centres is supported (Policy RTC4, RTC5 and RTC6), notably the recognition of the role and purpose of the town centres beyond retail uses.

The contribution that the County Library service could make to plans for the town centres should not be overlooked. The 5 libraries in the District are substantial footfall draws in their localities and act as a 'community anchor store'. This has knock-on effects in encouraging use of neighbouring retail and service facilities. Further the Library service is currently looking at co-location opportunities for other services within the libraries which would enable them to act as a community focus.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16760 - 14229 - Policy RTC6 - Hockley Town Centre - i, iii

16760 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Hockley Under Threat (J Abbey) [14229]

Hockley Under Threat
None provided

Agent: N/A

Full Text:

Ch. 4 Housing; Ch.10 Transport, Highways; Ch.11 Economic Development; Ch.12 Retail/town centres; Ch.5 Character of place & Local Lists

Chapter 4: Housing

Para 4.8 States sustainability underlines any decisions on housing location, primarily: current and future deliverability of infrastructure, eg roads, services, public transport, health.

Policy H1, Para.4.14 Some employment sites are considered more suitable for other uses (eg housing) including Eldon Way/Foundry, Hockley. This is all open to question.

Hockley-re Eldon Way/Foundry

In CS Preferred Options 2008 policy H2

N.E.Hockley was discarded as a housing option - whilst close to centre, station, "impact on highway network from traffic heading through Hockley...along Ashingdon Road..renders location unviable". Clearly the same principle applied to Eldon Way/Foundry for the same reasons.

Need to be logical and even-handed in proposals

June 2009 issue C S Submission issue says Eldon Way will be used for housing, whereas Sept.2009 issue says "alternative uses, including residential.." to be decided by HAAP (Issues consultation done, Pref.Options issue awaited, but judging from JAAP Pref.Options decision - namely biggest option chosen against overriding opposition, it will be housing).

Policy H1, T1 Proposals for moving employment to out of town locations, at either end of the district, with no existing public transport links, are contrary to government policy PPG14 & PPS1. it also contravenes the Core Strategy's stated aims of reducing carbon emissions; reliance on car transport and providing "an integrated network of cycle paths",

The Core Strategy also contravenes its own policy T1 and is unsound.

Health services GP surgeries are full and a PCT health centre will not occur in the foreseeable economic climate.

Ch.10: Highways and Transport

Policy T1, T2 RDC proposes working with ECC Highways, developers, but admits it has no authority, responsibility here. RDC will seek developer contributions, but this is neither detailed nor costed in CS Submission nor HAAP, and contravenes PPS 12.3 para.4.93 which states "The infrastructure planning process should identify as far as possible infrastructure needs and costs". Idea of paying for road & transport improvements through Standard Charges is unproven and unsound.

Establish like motorways with wholesale demolition.

In neither CS Submission nor HAAP is there any highways improvement, except idea to replace Spa roundabout with traffic lights and 1 way system up Southend Road and Hockley Rise.

RDC are proposing to scatter housing across the district in around 12 or sites but no detailed consideration has been given to the implications for highways across the District. Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts.

It is clear that (i) the combined impact of scattering houses across the District and (ii) relocating Eldon Way/Foundry Industrial Estates with no public transport services will exacerbate existing problems. It is clear that the extent of improvements required is both unknown and not funded and the proposal is unsound.

Para.10.5

Policy T3, CLT1 Appendix CLT1

T1 & T2 "...highway improvements serving new developments..in a timely manner..ensuring developments delivered alongside necessary infrastructure".

These improvements cannot possibly be delivered. It should be realised: B1013 (Southend Rd), Rectory Road Hawkwell, Ashingdon, West Rochford - all in area proposed for large new developments are former winding, narrow country roads, tarmacked over for motorised traffic. Large housing increments are unsustainable off these roads, which

Core Strategy Submission Document

O - 16760 - 14229 - Policy RTC6 - Hockley Town Centre - i, iii

16760 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

cannot be altered without much destruction.

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Para.1.25 Para.11.32

Policy ED4 T1 & T2 Note CH.1 Introduction to CS Submission 2009 para.1.25 East England Plan requires 3000 additional jobs, presumably to 2021. Revised Southend Airport is expected to drive Economic development. But at para. 11.32 Eldon Way-Foundry estate is planned to be more suitably utilized. "...alternative land will be required to accommodated employment uses so displaced" - ie jobs sent to eg new site near Southend Airport - not new jobs.

Remove compulsory relocation

Policy states Council will allocate 18ha of land to make up for de-allocations in ED3 - that proves point above.

Proposals for moving employment to out of town locations with no existing transport links are contrary to government policies PPG4, PPS1 and PPS4 and Core Strategy Policy T1.

Evidence Base is ignored by contravening Hockley Parish Plan 2007 and ignoring residents' views on HAAP Issues/Options. Next stage of HAAP Preferred Options is pre-empted and rendered irrelevant.

Core Strategy plans to relocate Eldon Way Foundry estate to Greenfield site with no nearby bus or railway. RDC plans to upgrade the nearest road to dual carriageway, though the connecting B1013 (through Hockley) will stay single, said by ECC Highways statistics to be 72% capacity. Airport bosses and council cannot suggest there will be no traffic growth from JAAP and new industrial site.

Revise both 2009 Core Strategy and 2009 HAAP Issues/options

Move to new industrial site near airport contravenes PPS4:

EC7.3C "out of centre sites, with preference given to sites..well served by choice of..transport and..close to centre and..high likelihood of forming links with centre". There is no current public transport and links with centres is unlikely".

EC 7.5.1 "whether the site is or will be accessible and well served by choice of transport, public transport, walking and cycling, as well as by car..". Remote location, narrow busy B1013 makes the site unsuitable for access by cycle or on foot.

It also contravenes PPS1 (27vii).. "reduce need to travel, encourage accessible public transport provision to secure more sustainable patterns of transport..Planning should actively manage patterns of urban growth to make fullest use of public transport and focus development in existing centres, near to major public transport interchanges". Core Strategy undermines its own policy Transport and Highways policy T1 and is unsound.

H1 & RTC6 Although shown on accompanying drawing in earlier versions, there was no prior textual mention of Foundry industrial estate (next to Eldon Way) for redevelopment until current CS 2009 Submission. In recent amendment to the CS this was stated to be due to a typing error!

Chapter 12: Retail/Town centres

The Core Strategy misrepresents findings of the Retail and Leisure Study 2008.

Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

Para.12.38 H1 & RTC6 The Core Strategy states (para.12.38) "The Retail & Leisure Study indicates Hockley has great potential. Hockley has been identified as having a need for additional convenience floorspace."

Whereas the R&LS actually states:

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Core Strategy Submission Document

16760 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

shopping expenditure".

2) (10.28) "There is no immediate capacity for additional floorspace".

3) (10.29) "we recommend focus be maintained on developing Hockley's existing strengths, rather than retail expansion"

4) 10.31 "the current nature of Hockley does not lend itself to classification as a 'town centre' as defined by PPS6. Moreover, we have identified that it has a very small catchment population. Accordingly, the council may wish to consider reclassifying Hockley from a town centre to a district centre".

Remove threat of compulsory purchase orders.

The Council will work with landowners and its partners to deliver the HAAP.

Chapter 5: Character of Place and Local Lists

Para.5.4 "Rochford district has unique character..stems from traditional buildings..still dominate towns and villages".

Para.5.17 "Council believes many buildings..are of local distinctiveness..part of..cherished local scene".

This only appears to apply to certain places: Rochford, Rayleigh, greenbelt villages. Many Hockley conservable items have been systemically removed for supposedly lucrative development in face of widespread protect. This is for supposed need for housing. In fact heritage items have been replaced by dwellings most cannot afford, and/or are hard to sell due to unsuitability of massing and siting. Many other homes are jeopardised by this practice.

Conclusion

Core Strategy Submission DPD is basically unsound in many respects:

Incomplete information. Amongst others, it refers to Hockley AAP, the first stage of which is complete, but not other three. Rochford AAP first stage has been published in arrears of Core Strategy Submission. Rayleigh AAP is still awaited. Precise housing sites are absent, as Urban Capacity Study 2007 has been superseded by Strategic Housing Land Availability Assessment, not yet published. Traders, residents, are thus responding to Core Strategy Submission with incomplete information.

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In Core Strategy Submission Hockley Parish Plan has been ignored. Proposals also ignore 95% rejection rate response to HAAP 2009, which included proposals for Eldon Way employment site.

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Where are we? Finally, at Chapter 1, Introduction, para. 1.24: "the Core Strategy will have to be reviewed in the event of a new Local Area Agreement, post-2011, setting different priorities". So what purpose does all this work serve? So we have hardly finished this exercise, before it all starts again?

Summary:

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Change to Plan

Appear at exam? Not Specified **Soundness Tests** i, iii

Core Strategy Submission Document

16763 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

Respondent: Hockley Under Threat (J Abbey) [14229]

Hockley Under Threat
None provided

Agent: N/A

Full Text: Ch. 4 Housing; Ch.10 Transport, Highways; Ch.11 Economic Development; Ch.12 Retail/town centres; Ch.5 Character of place & Local Lists

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O - 16763 - 14229 - Policy RTC6 - Hockley Town Centre - i, iii

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Core Strategy Submission Document

16763 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

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Core Strategy Submission Document

O - 16763 - 14229 - Policy RTC6 - Hockley Town Centre - i, iii

16763 Object

CHAPTER 12 Policy RTC6 - Hockley Town Centre

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The Council will work with landowners and its partners to deliver the HAAP.

Change to Plan Defer whole of proposals for Hockley town centre to Hockley Area Action Plan.

Remove threat of compulsory purchase orders.

Appear at exam? Not Specified **Soundness Tests** i, iii

Core Strategy Submission Document

O - 15867 - 12083 - Implementation, Delivery and Monitoring - ii

15867 Object

CHAPTER 13 Implementation, Delivery and Monitoring

Respondent: Mr Paul Sealey [12083]

Agent: N/A

Kirrin,
Hockley Rise,
Hockley
SS5 4PT
United Kingdom
01702206888

Full Text: The Annual Monitoring Report will only tell you what has happened after the event and there will probably be further delays while an action plan is produced. Whilst some recognised indicators are proposed they do not have particular targets to help identify where the strategy is not delivering as expected. Other monitoring is simply reporting what the current status is with no method of identifying if that is on target or not.

Summary: The Annual Monitoring Report will only tell you what has happened after the event and there will probably be further delays while an action plan is produced. Whilst some recognised indicators are proposed they do not have particular targets to help identify where the strategy is not delivering as expected. Other monitoring is simply reporting what the current status is with no method of identifying if that is on target or not.

Change to Plan There should be clear targets and measures to identify whether the strategy is delivering to plan and take corrective action before it gets out of hand.

Appear at exam? No

Soundness Tests ii

Core Strategy Submission Document

S - 16001 - 13441 - Implementation, Delivery and Monitoring - None

16001 Support

CHAPTER 13 Implementation, Delivery and Monitoring

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: The Implementation, Delivery and Monitoring Plan identifies, clearly, a description of tasks, ownership, potential risk, mitigative action and monitoring measures.

Summary: The Implementation, Delivery and Monitoring Plan identifies, clearly, a description of tasks, ownership, potential risk, mitigative action and monitoring measures.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16703 - 9072 - Implementation, Delivery and Monitoring - i

16703 Object

CHAPTER 13 Implementation, Delivery and Monitoring

Respondent: Essex County Council (Mr Roy Lewis) [9072] **Agent:** N/A

Essex County Council
ESH - Spatial Planning
Planning and Transport
County Hall
Chelmsford
CM1 4JU
01245-437578

Full Text: ROCHFORD CORE STRATEGY SUBMISSION DOCUMENT, SEPTEMBER 2009
RESPONSE OF ESSEX COUNTY COUNCIL

1. General Comment

Essex County Council welcomes and broadly supports the Core Strategy prepared by Rochford District Council. The Strategy contains policies and proposals that address the spatial characteristics, issues and opportunities facing the District whilst respecting the distinctive qualities of the different settlements and parts of the District.

The County Council fully supports the maintenance of a strong policy approach to protection of the Green Belt and of the quality of environmental assets in the District whilst making adequate housing and employment provision within the District. The Core Strategy presents an approach that emphasises a balance of opportunity through the District and recognition of emerging economic prospects in the District and neighbouring areas. The intended preparation of more detailed Action Area Plans for London Southend Airport and its environs and for each of the three town centres of Rayleigh, Rochford and Hockley will further enhance the approach of the Core Strategy. The emphasis on the three town centres is particularly welcomed as offering a stimulus to improvement in the services and facilities available locally within the District whilst also affording possibilities of increased community focus.

2. Housing Distribution and Locations

The East of England Plan requires Rochford to provide a minimum of 3,790 additional dwellings between 2006 and 2021. In addition, provision for a further 1,000 dwellings should be made between 2021 and 2025 to ensure delivery of housing for at least 15 years from adoption of the Core Strategy (expected in 2010). Of this total requirement the District Council has identified a capacity of 2,000 dwellings through a Strategic Housing Land Availability Assessment. This means that the Core Strategy has to identify locations for about 1,750 dwellings to be delivered before 2021 and a further 1,000 dwellings between 2021 and 2025.

Policy H1 (The efficient use of land for housing) is supported. However, prioritisation of the reuse of previously developed land within settlements for additional housing is unlikely to provide a sufficient source of provision due to the generally residential nature of existing settlements in the district and the absence of potentially large sites of previously developed land. The assessment of potential for additional housing provision within settlements already includes the proposed re-allocation to substantially residential use of 4 existing employment areas.

Within Policy H2 (Extensions to residential envelopes and phasing) and Policy H3 (Extension to residential envelopes post-2021) the District Council has adopted a balanced approach to the distribution of additional housing locations, which is based on identification of tiers of settlements defined by reference to their accessibility to jobs, services and facilities (some of which lie outside the District) and the need to protect the valued environments within the District. This approach is generally supported, although implementation and delivery of individual schemes should give further thought to securing sustainable functional relationships between proposed development locations and availability of jobs, services and facilities.

The proposed scale and phasing of development at each of the identified locations in Policy H2 and Policy H3 should be capable of being supported by County Council service groups, provided that adequate and timely funding is available. The County Council would wish to work with the District Council to ensure that future infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

3. Economic Development

The approach to Employment Growth (Policy ED1) is supported. Given the economic structure of Rochford District the support to be given to protection and enhancement of the role of small and medium sized businesses; enhancement of the District's commercial centres; and development of a skills training academy is particularly welcome. These measures will assist in building on the existing economic resource of the District.

Proposals for the comprehensive development of London Southend Airport and its environs (Policy ED2) are supported.

16703 Object

CHAPTER 13 Implementation, Delivery and Monitoring

The further elaboration of proposals through an Area Action Plan will provide a firm foundation to realise the economic regeneration and growth opportunities presented by effective use of the Airport. The recognition of the potential environmental impact of the Airport and the commitment to work to mitigate any adverse impacts on the environment and local amenities is fully supported.

The location of the proposed Eco-Enterprise Centre to the North of London Southend Airport (Policy ED4) is supported. Creation of the Centre would assist reduction of the rate of business start-up failure in the district. Further the proposed location for the Centre would afford a clear offer to businesses within an area of varied business activity.

The continued protection and enhancement of existing employment land (Policy ED3) is supported, as is the identification of 4 existing employment sites for appropriate alternative, substantially residential, uses. Each of the 4 sites affords particular issues and opportunities whereby their redevelopment for other uses and relocation of existing occupiers would confer advantage for the immediately neighbouring areas and for the District as a whole.

4. Town Centres

The town centres of Rayleigh, Rochford and Hockley, and future plans for them, are closely linked to the economic development of the District but also present the opportunity to offer greater community focus within the District. The varied approach being taken to each of these town centres is supported (Policy RTC4, RTC5 and RTC6), notably the recognition of the role and purpose of the town centres beyond retail uses.

The contribution that the County Library service could make to plans for the town centres should not be overlooked. The 5 libraries in the District are substantial footfall draws in their localities and act as a 'community anchor store'. This has knock-on effects in encouraging use of neighbouring retail and service facilities. Further the Library service is currently looking at co-location opportunities for other services within the libraries which would enable them to act as a community focus.

5. Transport

The transport aspects of the Core Strategy are well balanced in identifying potential measures that would meet the needs of existing residents and businesses in the District as well as needs arising from future development. The approach reflects and makes good reference to the transportation aspirations of the County Council. The policy emphasis on close working between the District Council and the County Council to advance the transport aspirations is welcomed and fully supported.

In relation to parking standards (Policy T8 and Paragraph 10.30) the review undertaken by Essex County Council in conjunction with the Essex Planning Officers Association has now been completed. Revised parking standards have been agreed and signed off as County Supplementary Guidance, in accordance with PPS12, and is being applied by the County Council as Local Highways Authority.

6. Coastal Protection Belt

Policy ENV2 (Coastal Protection Belt) is not supported because in its current form it is not a suitable or effective replacement policy for Policy CC1 of the Replacement Structure Plan. Structure Plan Policy CC1 (The Undeveloped Coast - Coastal Protection Belt) currently remains a 'saved' policy of the Essex and Southend-on-Sea Replacement Structure Plan, April 2001 (following a direction of the Secretary of State, dated 27th September 2007, under paragraph 1(3) of Schedule 8 to the Planning and Compulsory Purchase Act 2004). The existing Policy CC1 reads, 'Within the Coastal Protection Belt defined in adopted local plans there shall be the most stringent restrictions on development within the rural and undeveloped coastline situated outside existing built-up areas, and any development which is exceptionally permitted within this Belt shall not adversely affect the open and rural character, historic features or wildlife.'

Core Strategy Policy ENV2 should be revised to include specific reference to,

- * Definition of the boundary of the Coastal Protection Belt in another Development Plan Document;
- * the application of the most stringent restrictions on development within the rural and undeveloped coastline;
- * any development exceptionally permitted not adversely affecting the open and rural character, historic features or wildlife.

7. Historic Environment

The importance of the historic environment in Rochford District is clearly identified within the Core Strategy document. Nevertheless, the policy guidance could be usefully enhanced to promote consideration and enhancement of the historic environment and use of the historic environment to shape place. This would be achieved by the following amendments to the Core Strategy,

- * Policy ENV1 (Protection and Enhancement of the Natural Landscape and Habitats and the Protection of Historical and Archaeological Sites) should be amended by deletion of the final sentence and its replacement with, 'The Council is committed to the protection, promotion and enhancement of the diverse historic landscape and extensive surviving archaeological deposits of the District.'

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CHAPTER 13 Implementation, Delivery and Monitoring

* Paragraph 8.15 of the supporting text should be amended to better support the suggested amendment to Policy ENV1. The existing text of Paragraph 8.15 should be deleted in its entirety and replaced by,
The historic environment of Rochford District has developed through a history of human activity that spans over 450,000 years. Much of the resource lies hidden beneath the ground in the form of archaeological deposits. Other elements such as the historic landscape, the pattern of field, farms, woods and grazing marsh which characterise the District, are a highly visible record of millennia of agriculture, industry and commerce. Of particular significance are the coastal, island and estuarine areas where multi-period landscapes reflecting the exploitation of coastal and marshland resource survive. The District also includes the important historic medieval market towns of Rochford and Rayleigh.

* Page 16 (Sustainable Community Strategy Priority: Promoting a Greener District) should be amended to further support the approach to the Historic Environment. The fourth bullet of the Key Section/Policies of the Core Strategy should be amended to include the word 'historic', so that the first sentence of the bullet would read,
The Environment chapter seeks to protect and enhance the biodiversity, historic and natural environment of the District by protecting sites of local, national and international importance.

8. Community Infrastructure

The approach to Community Infrastructure is supported. The County Council would wish to work with the District Council to ensure that future community infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

In addition, it should be noted that,

* Some County Council services are not highly visible despite being regarded as highly desirable community services by local residents. The need to ensure adequate funding and contributions to enable these services to meet community expectations should be recognised and acknowledged in consideration of planning obligations and standard charges.

* The Adult Community Learning Centre at Rocheway, Rochford could be better located with regard to the wider Rochford/Castle Point area of service. Relocation of the Centre could provide opportunities both at the new location and for the current site.

* The Core Strategy should make specific reference to,

o Appendix H1, Location at South Canewdon: new Early Years and Childcare facilities;

o Policy CLT2, final sentence: insert after the words 'primary schools' the words 'and Early Years and Childcare facilities';

o Appendix CLT1, Other issues/comment: for Early years and childcare facilities add 'Land to be allocated within new residential areas, as appropriate'.

9. Implementation, Delivery and Monitoring

The inclusion in the Core Strategy of a section considering Implementation, Delivery and Monitoring is welcomed and supported. Nevertheless, the District Council, in moving towards implementation and delivery of the individual elements of the Core Strategy, should highlight those schemes and projects that are critical to achievement of other aspects of the Strategy.

Further, the monitoring proposal for Policy H6 (Lifetime Homes) and for Policy CP1 (Design) should be amended,

* Policy H6 (Lifetime Homes) - the identified monitoring tool is Core Indicator H6 Housing Quality Building for Life Assessments. The Building for Life Assessment methodology was devised to measure the overall design/layout quality of housing developments. It was not devised to measure compliance with Lifetime Homes, which is largely, but not exclusively, concerned with internal space standards and the provision of internal arrangements within dwellings to meet needs of all residents.

* Policy CP1 (Design) - the monitoring indicator proposed by the Core Strategy is not supported because it is unclear what the indicator would actually be measuring. The proposed indicator should be replaced by the Core Indicator, Housing Quality - Building for Life Assessments, as suggested by the County Council in its response to the Core Strategy Preferred Options, October 2008. A better approach would be to base evaluation and monitoring of Policy CP1 on the Commission for Architecture and the Built Environment's (CABE) 20 Building for Life principles, particularly as Government has endorsed these principles and is urging local authorities to use them to assess design quality. It is suggested that the monitoring arrangements for Preferred Option CP1 be deleted and replaced by the following text, 'The success of the implementation of this policy will be monitored by assessing schemes, or an appropriate sample of schemes, against the Commission for Architecture and the Built Environment's (CABE) Building for Life principles.'

10. Access to Housing

The Core Strategy notes the higher prevalence of older people in Rochford District and the need to support them. However, a more broadly based approach to access to housing should be adopted by Policies H4, H5 and H6. It should recognise the presence of other vulnerable adults in the community, for example, those with learning or mental health disability, and the range of possible forms of accommodation, including supported, sheltered and extra care accommodation. The high level of owner occupation in the District further emphasises the need for a broader approach. The emphasis on Lifetime Homes would not address the variety of future needs, whilst the potential exemptions to the

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O - 16703 - 9072 - Implementation, Delivery and Monitoring - i

16703 Object

CHAPTER 13 Implementation, Delivery and Monitoring

Lifetime Homes policy standard in Policy H6 are likely to act against demographic trends.

Summary: The inclusion in the Core Strategy of a section considering Implementation, Delivery and Monitoring is welcomed and supported. Nevertheless, the District Council, in moving towards implementation and delivery of the individual elements of the Core Strategy, should highlight those schemes and projects that are critical to achievement of other aspects of the Strategy.

Change to Plan Further, the monitoring proposal for Policy H6 (Lifetime Homes) and for Policy CP1 (Design) should be amended, * Policy H6 (Lifetime Homes) - the identified monitoring tool is Core Indicator H6 Housing Quality Building for Life Assessments. The Building for Life Assessment methodology was devised to measure the overall design/layout quality of housing developments. It was not devised to measure compliance with Lifetime Homes, which is largely, but not exclusively, concerned with internal space standards and the provision of internal arrangements within dwellings to meet needs of all residents.

Appear at exam? Not Specified **Soundness Tests** i

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16704 Object

CHAPTER 13 Implementation, Delivery and Monitoring

Respondent: Essex County Council (Mr Roy Lewis) [9072] **Agent:** N/A

Essex County Council
ESH - Spatial Planning
Planning and Transport
County Hall
Chelmsford
CM1 4JU
01245-437578

Full Text: ROCHFORD CORE STRATEGY SUBMISSION DOCUMENT, SEPTEMBER 2009
RESPONSE OF ESSEX COUNTY COUNCIL

1. General Comment

Essex County Council welcomes and broadly supports the Core Strategy prepared by Rochford District Council. The Strategy contains policies and proposals that address the spatial characteristics, issues and opportunities facing the District whilst respecting the distinctive qualities of the different settlements and parts of the District.

The County Council fully supports the maintenance of a strong policy approach to protection of the Green Belt and of the quality of environmental assets in the District whilst making adequate housing and employment provision within the District. The Core Strategy presents an approach that emphasises a balance of opportunity through the District and recognition of emerging economic prospects in the District and neighbouring areas. The intended preparation of more detailed Action Area Plans for London Southend Airport and its environs and for each of the three town centres of Rayleigh, Rochford and Hockley will further enhance the approach of the Core Strategy. The emphasis on the three town centres is particularly welcomed as offering a stimulus to improvement in the services and facilities available locally within the District whilst also affording possibilities of increased community focus.

2. Housing Distribution and Locations

The East of England Plan requires Rochford to provide a minimum of 3,790 additional dwellings between 2006 and 2021. In addition, provision for a further 1,000 dwellings should be made between 2021 and 2025 to ensure delivery of housing for at least 15 years from adoption of the Core Strategy (expected in 2010). Of this total requirement the District Council has identified a capacity of 2,000 dwellings through a Strategic Housing Land Availability Assessment. This means that the Core Strategy has to identify locations for about 1,750 dwellings to be delivered before 2021 and a further 1,000 dwellings between 2021 and 2025.

Policy H1 (The efficient use of land for housing) is supported. However, prioritisation of the reuse of previously developed land within settlements for additional housing is unlikely to provide a sufficient source of provision due to the generally residential nature of existing settlements in the district and the absence of potentially large sites of previously developed land. The assessment of potential for additional housing provision within settlements already includes the proposed re-allocation to substantially residential use of 4 existing employment areas.

Within Policy H2 (Extensions to residential envelopes and phasing) and Policy H3 (Extension to residential envelopes post-2021) the District Council has adopted a balanced approach to the distribution of additional housing locations, which is based on identification of tiers of settlements defined by reference to their accessibility to jobs, services and facilities (some of which lie outside the District) and the need to protect the valued environments within the District. This approach is generally supported, although implementation and delivery of individual schemes should give further thought to securing sustainable functional relationships between proposed development locations and availability of jobs, services and facilities.

The proposed scale and phasing of development at each of the identified locations in Policy H2 and Policy H3 should be capable of being supported by County Council service groups, provided that adequate and timely funding is available. The County Council would wish to work with the District Council to ensure that future infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

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The approach to Employment Growth (Policy ED1) is supported. Given the economic structure of Rochford District the support to be given to protection and enhancement of the role of small and medium sized businesses; enhancement of the District's commercial centres; and development of a skills training academy is particularly welcome. These measures will assist in building on the existing economic resource of the District.

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CHAPTER 13 Implementation, Delivery and Monitoring

The further elaboration of proposals through an Area Action Plan will provide a firm foundation to realise the economic regeneration and growth opportunities presented by effective use of the Airport. The recognition of the potential environmental impact of the Airport and the commitment to work to mitigate any adverse impacts on the environment and local amenities is fully supported.

The location of the proposed Eco-Enterprise Centre to the North of London Southend Airport (Policy ED4) is supported. Creation of the Centre would assist reduction of the rate of business start-up failure in the district. Further the proposed location for the Centre would afford a clear offer to businesses within an area of varied business activity.

The continued protection and enhancement of existing employment land (Policy ED3) is supported, as is the identification of 4 existing employment sites for appropriate alternative, substantially residential, uses. Each of the 4 sites affords particular issues and opportunities whereby their redevelopment for other uses and relocation of existing occupiers would confer advantage for the immediately neighbouring areas and for the District as a whole.

4. Town Centres

The town centres of Rayleigh, Rochford and Hockley, and future plans for them, are closely linked to the economic development of the District but also present the opportunity to offer greater community focus within the District. The varied approach being taken to each of these town centres is supported (Policy RTC4, RTC5 and RTC6), notably the recognition of the role and purpose of the town centres beyond retail uses.

The contribution that the County Library service could make to plans for the town centres should not be overlooked. The 5 libraries in the District are substantial footfall draws in their localities and act as a 'community anchor store'. This has knock-on effects in encouraging use of neighbouring retail and service facilities. Further the Library service is currently looking at co-location opportunities for other services within the libraries which would enable them to act as a community focus.

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The transport aspects of the Core Strategy are well balanced in identifying potential measures that would meet the needs of existing residents and businesses in the District as well as needs arising from future development. The approach reflects and makes good reference to the transportation aspirations of the County Council. The policy emphasis on close working between the District Council and the County Council to advance the transport aspirations is welcomed and fully supported.

In relation to parking standards (Policy T8 and Paragraph 10.30) the review undertaken by Essex County Council in conjunction with the Essex Planning Officers Association has now been completed. Revised parking standards have been agreed and signed off as County Supplementary Guidance, in accordance with PPS12, and is being applied by the County Council as Local Highways Authority.

6. Coastal Protection Belt

Policy ENV2 (Coastal Protection Belt) is not supported because in its current form it is not a suitable or effective replacement policy for Policy CC1 of the Replacement Structure Plan. Structure Plan Policy CC1 (The Undeveloped Coast - Coastal Protection Belt) currently remains a 'saved' policy of the Essex and Southend-on-Sea Replacement Structure Plan, April 2001 (following a direction of the Secretary of State, dated 27th September 2007, under paragraph 1(3) of Schedule 8 to the Planning and Compulsory Purchase Act 2004). The existing Policy CC1 reads, 'Within the Coastal Protection Belt defined in adopted local plans there shall be the most stringent restrictions on development within the rural and undeveloped coastline situated outside existing built-up areas, and any development which is exceptionally permitted within this Belt shall not adversely affect the open and rural character, historic features or wildlife.'

Core Strategy Policy ENV2 should be revised to include specific reference to,

- * Definition of the boundary of the Coastal Protection Belt in another Development Plan Document;
- * the application of the most stringent restrictions on development within the rural and undeveloped coastline;
- * any development exceptionally permitted not adversely affecting the open and rural character, historic features or wildlife.

7. Historic Environment

The importance of the historic environment in Rochford District is clearly identified within the Core Strategy document. Nevertheless, the policy guidance could be usefully enhanced to promote consideration and enhancement of the historic environment and use of the historic environment to shape place. This would be achieved by the following amendments to the Core Strategy,

- * Policy ENV1 (Protection and Enhancement of the Natural Landscape and Habitats and the Protection of Historical and Archaeological Sites) should be amended by deletion of the final sentence and its replacement with, The Council is committed to the protection, promotion and enhancement of the diverse historic landscape and extensive surviving archaeological deposits of the District.

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CHAPTER 13 Implementation, Delivery and Monitoring

* Paragraph 8.15 of the supporting text should be amended to better support the suggested amendment to Policy ENV1. The existing text of Paragraph 8.15 should be deleted in its entirety and replaced by,
The historic environment of Rochford District has developed through a history of human activity that spans over 450,000 years. Much of the resource lies hidden beneath the ground in the form of archaeological deposits. Other elements such as the historic landscape, the pattern of field, farms, woods and grazing marsh which characterise the District, are a highly visible record of millennia of agriculture, industry and commerce. Of particular significance are the coastal, island and estuarine areas where multi-period landscapes reflecting the exploitation of coastal and marshland resource survive. The District also includes the important historic medieval market towns of Rochford and Rayleigh.

* Page 16 (Sustainable Community Strategy Priority: Promoting a Greener District) should be amended to further support the approach to the Historic Environment. The fourth bullet of the Key Section/Policies of the Core Strategy should be amended to include the word 'historic', so that the first sentence of the bullet would read,
The Environment chapter seeks to protect and enhance the biodiversity, historic and natural environment of the District by protecting sites of local, national and international importance.

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The approach to Community Infrastructure is supported. The County Council would wish to work with the District Council to ensure that future community infrastructure and facilities would serve and give benefit to the existing adjoining community as well as to the new development. In this respect it is noted that the Core Strategy proposes preparation by the District Council of a Planning Obligations and Standard Charges document (Policy CLT1). The District Council's document should fully reflect the County Council's own approach to this matter as set out in the County Council's 'Developer's Guide to Infrastructure Contributions'.

In addition, it should be noted that,

* Some County Council services are not highly visible despite being regarded as highly desirable community services by local residents. The need to ensure adequate funding and contributions to enable these services to meet community expectations should be recognised and acknowledged in consideration of planning obligations and standard charges.

* The Adult Community Learning Centre at Rocheway, Rochford could be better located with regard to the wider Rochford/Castle Point area of service. Relocation of the Centre could provide opportunities both at the new location and for the current site.

* The Core Strategy should make specific reference to,

o Appendix H1, Location at South Canewdon: new Early Years and Childcare facilities;

o Policy CLT2, final sentence: insert after the words 'primary schools' the words 'and Early Years and Childcare facilities';

o Appendix CLT1, Other issues/comment: for Early years and childcare facilities add 'Land to be allocated within new residential areas, as appropriate'.

9. Implementation, Delivery and Monitoring

The inclusion in the Core Strategy of a section considering Implementation, Delivery and Monitoring is welcomed and supported. Nevertheless, the District Council, in moving towards implementation and delivery of the individual elements of the Core Strategy, should highlight those schemes and projects that are critical to achievement of other aspects of the Strategy.

Further, the monitoring proposal for Policy H6 (Lifetime Homes) and for Policy CP1 (Design) should be amended,

* Policy H6 (Lifetime Homes) - the identified monitoring tool is Core Indicator H6 Housing Quality Building for Life Assessments. The Building for Life Assessment methodology was devised to measure the overall design/layout quality of housing developments. It was not devised to measure compliance with Lifetime Homes, which is largely, but not exclusively, concerned with internal space standards and the provision of internal arrangements within dwellings to meet needs of all residents.

* Policy CP1 (Design) - the monitoring indicator proposed by the Core Strategy is not supported because it is unclear what the indicator would actually be measuring. The proposed indicator should be replaced by the Core Indicator, Housing Quality - Building for Life Assessments, as suggested by the County Council in its response to the Core Strategy Preferred Options, October 2008. A better approach would be to base evaluation and monitoring of Policy CP1 on the Commission for Architecture and the Built Environment's (CABE) 20 Building for Life principles, particularly as Government has endorsed these principles and is urging local authorities to use them to assess design quality. It is suggested that the monitoring arrangements for Preferred Option CP1 be deleted and replaced by the following text, 'The success of the implementation of this policy will be monitored by assessing schemes, or an appropriate sample of schemes, against the Commission for Architecture and the Built Environment's (CABE) Building for Life principles.'

10. Access to Housing

The Core Strategy notes the higher prevalence of older people in Rochford District and the need to support them. However, a more broadly based approach to access to housing should be adopted by Policies H4, H5 and H6. It should recognise the presence of other vulnerable adults in the community, for example, those with learning or mental health disability, and the range of possible forms of accommodation, including supported, sheltered and extra care accommodation. The high level of owner occupation in the District further emphasises the need for a broader approach. The emphasis on Lifetime Homes would not address the variety of future needs, whilst the potential exemptions to the

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O - 16704 - 9072 - Implementation, Delivery and Monitoring - i

16704 Object

CHAPTER 13 Implementation, Delivery and Monitoring

Summary:	<p>Lifetime Homes policy standard in Policy H6 are likely to act against demographic trends.</p> <p>The inclusion in the Core Strategy of a section considering Implementation, Delivery and Monitoring is welcomed and supported. Nevertheless, the District Council, in moving towards implementation and delivery of the individual elements of the Core Strategy, should highlight those schemes and projects that are critical to achievement of other aspects of the Strategy.</p> <p>Policy CP1 (Design) - the monitoring indicator proposed by the Core Strategy is not supported because it is unclear what the indicator would actually be measuring. The proposed indicator should be replaced by the Core Indicator, Housing Quality - Building for Life Assessments, as suggested by the County Council in its response to the Core Strategy Preferred Options, October 2008. A better approach would be to base evaluation and monitoring of Policy CP1 on the Commission for Architecture and the Built Environment's (CABE) 20 Building for Life principles, particularly as Government has endorsed these principles and is urging local authorities to use them to assess design quality.</p>
Change to Plan	<p>It is suggested that the monitoring arrangements for Preferred Option CP1 be deleted and replaced by the following text, 'The success of the implementation of this policy will be monitored by assessing schemes, or an appropriate sample of schemes, against the Commission for Architecture and the Built Environment's (CABE) Building for Life principles.'</p>
Appear at exam?	Not Specified
Soundness Tests	i

Core Strategy Submission Document

O - 16859 - 9889 - Implementation, Delivery and Monitoring - i, iii

16859 Object

CHAPTER 13 Implementation, Delivery and Monitoring

Respondent: Environment Agency (Miss Carrie Williams) [9889] **Agent:** N/A

Environment Agency
Iceni House
Cobham Road
Ipswich
Suffolk
IP3 9JD
United Kingdom
01473 706007

Full Text: Under the heading "risk mitigation" for Policy ENV3, the Council do not make any reference to updating their Strategic Flood Risk Assessment. This will be essential for the delivery of sustainable development in the district and will be required as part of the evidence base for more detailed DPDs being undertaken as part of the LDF. It is not considered adequate to rely solely on the flood maps produced by the Environment Agency and PPS25 requires LPAs to produce a Strategic Flood Risk Assessment.

Acknowledge the requirement to update the SFRA for the District in line with the requirements of PPS25.

Summary: Under the heading "risk mitigation" for Policy ENV3, the Council do not make any reference to updating their Strategic Flood Risk Assessment. This will be essential for the delivery of sustainable development in the district and will be required as part of the evidence base for more detailed DPDs being undertaken as part of the LDF. It is not considered adequate to rely solely on the flood maps produced by the Environment Agency and PPS25 requires LPAs to produce a Strategic Flood Risk Assessment.

Change to Plan Acknowledge the requirement to update the SFRA for the District in line with the requirements of PPS25.

Appear at exam? No **Soundness Tests** i, iii

Core Strategy Submission Document

O - 16918 - 10009 - Implementation, Delivery and Monitoring - i

16918 Object

CHAPTER 13 Implementation, Delivery and Monitoring

Respondent: Barratt Eastern Counties [10009]

Barratt Eastern Counties
Barratt House
7 Springfield Lyons Approach
Springfield
Chelmsford
Essex
CM2 5EY

01245 232200

Agent: Kember Loudon Williams Ltd (Mr Martin Hull) [8466]

Kember Loudon Williams Ltd
Ridgers Barn
Bunny Lane
Eridge
Tunbridge Wells

TN3 9HA
Engalnd
01892 750018

Full Text: Local Development Framework

Representations on the Core Strategy
Submission Document, November 2009
On behalf of Barratts Eastern Counties

Introduction

The requirements of Core Strategies are enshrined in the 2004 Planning and Compensation Act, the Town & Country Planning (Local Development) England (Regulations) 2004 and the 2008 policy guidance in PPS12. The requirements of Coe Strategies are clear. And they are legal requirements. The Core Strategy must comply with the Local Development Scheme, Statement of Community Involvement and the Regulations. The Core Strategy must be subject to a sustainability appraisal, have regard to national guidance, conform generally with the Regional Spatial Strategy and have regard to any Sustainable Community Strategy. A Core strategy must be sound - justified, effective and consistent with national policy. The following representations therefore focus on these legal requirements.

HOUSING

Paragraph 4.6 - Evidence Base

To meet the soundness test Submission Core Strategies (SCS) must be justified, that is to say it must be founded on robust and credible evidence base and comprise the most appropriate strategy when considered against reasonable alternatives. The housing strategy in as far as it identifies a need for Green belt sites is sound, however, there are other elements which are unsound.

Paragraph 4.6 notes that the Strategic Housing Land Availability Assessment (SHLAA) has examined the supply of housing. It is presumed that the Table at paragraph 4.6 is the outcome of this examination. Whilst the SHLAA has some legitimacy in that it identifies various sites that are apparently available, we are concerned that because the SHLAA was only published in November 2009 it post dates the SCS. This implies that the SCS is driving the SHLAA exercise rather than the other way round. Whilst this may have no real practical effect on the outcome of the SCS and the identified need for Green Belt sites, the Inspector will be mindful of the advice in paragraphs 33 and 54 of PPS3 that SCS draw on the evidence in SHLAA. It may be that the SCS should explain how the evidence base has been used to justify the strategy.

PPS12 explains at paragraph 4.37 that Core Strategies are based on thorough evidence. Since the SHLAA has only recently been published it is considered that the SCS is unsound as it is not justifiable. This, together with other comments on the SCS, indicates that the process should be delayed to ensure that a more robust document is placed in front of the EiP Inspector.

Table at Paragraph 4.6 - Evidence base

From our review of the available evidence it would appear that the housing land supply is insufficient and that Green Belt release are required. From the wider strategy being promoted we note that some of the sites that the District Council consider to be 'appropriate' are likely to relate to existing employment areas. As set out elsewhere in our representations, we maintain severe reservations that the redevelopment of existing employment sites for alternative uses and particularly the Eldon Way Industrial Estate is unsustainable. We will make reference to the effectiveness of this strategy in relation to sustainability, whether it is justified in the context of National Policy and the deliverability of such a strategy elsewhere.

In particular, paragraph 11.32 of the SCS refers to existing employment land and sites within the UCS. It does not refer the SHLAA and as such it appears that an evidence base to support the re-use of employment land for residential is not reported in the SCS.

Having reviewed the 2008 Annual Monitoring Report, as we did when commenting on the 2008 Preferred Options Core Strategy, we maintain severe doubts as to the appropriateness of some of the previously developed sites identified as potential housing sites and their expected housing yield. Whilst we cannot at this stage ascertain whether the SHLAA

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CHAPTER 13 Implementation, Delivery and Monitoring

sites referred to in this table correlate with the Annual Monitoring Report and indeed the 2007 Urban Capacity Study, it is our view that there will be some commonality and so the reliance on these sites is likely to be at odds with Government Policy. We shall elaborate on this objection in relation to the specific housing policy below.

We note that the last two rows in the Table at paragraph 4.6 set out figures with and without Green Belt releases. The text to this section of the Core Strategy should, for reasons of clarity, explain that Green belt review will be necessary in order to deliver the required housing.

Paragraph 4.9

The table on page 40, which sets out the settlement tiers, is supported. Rayleigh, Rochford/Ashingdon, Hockley/Hawkwell are clearly the largest settlements in the District and they benefit from good employment, housing, leisure, community and public transport provision. These settlements are the most sustainable ones with the greatest mix of uses. Consequently, it is sensible that the Core Strategy identifies these as top tier settlements and is able to target them with growth accordingly. This component of the strategy is justified by reference to sustainability data and is effective, since targeting development at these locations will ensure a more sustainable pattern of development.

Paragraph 4.14

We maintain that the strategy for redeveloping the Eldon Way Industrial Estate for housing and other alternative uses to employment is unsound. It is neither justified nor effective. The Industrial Land Availability Study 2006 sets out on page 7 strategic objectives. The 3rd objective seeks to Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive. Clearly the strategy as currently drafted envisages major changes to existing industrial estates, including alternative uses. This strategy is not consistent with other strategies and evidence based studies and so cannot be justified in the context of the tests set out in PPS12. It is also an ineffective strategy since the new employment locations that would free up the Eldon Way site for redevelopment relies on transport infrastructure that has no certainty of being delivered. Principally, the erosion of employment uses at Eldon Way could make the settlement of Hockley/Hawkwell less sustainable and thus conflict with the tiered approach on page 40, paragraph 4.9.

Policy H1

Prioritising the use of previously developed land ("pdl") is supported in principle. It is a justified strategy in the context of PPS3 and effective as sequential choices can be made by implementing the policy. However, the District Council is also promoting a strategy which seeks the redevelopment of existing employment locations to alternative uses and by consequence is identifying green field sites for new employment development elsewhere (Policy ED4 refers). This 'land swapping' is not considered consistent with PPS3, nor is it considered to be justified or effective in delivering the desired strategy. This is particularly the case as most of the existing employment sites are occupied and therefore unavailable for redevelopment. In addition, the new Greenfield sites are in an arguably less sustainable locations away from the top tier settlements identified on page 40 of the Submission Core Strategy. Clearly this element of the strategy is inconsistent with the wider strategy.

The Industrial Land Availability Study 2006 is included as an evidence base by the District Council. It includes an introductory section, which explains that the authority wishes to make Rochford the place of choice for new business. It includes several strategic objectives on page 7 including "Support town centre and industrial estate enhancement initiatives aimed at improving the environment ensuring the area is economically prosperous and competitive." It reviews existing employment areas and identifies vacant land, including land available from allocations. It does not include any assessment of new sites or potential opportunities for new sites that might have been expected to feed into the Core Strategy. The strategy for identifying Green Belt site employment allocation does not appear to be based on any evidence in this document and in that context cannot be justified. The strategy being promoted potentially conflicts with Government policy in PPG13, PPG2 and emerging PPS4.

The Employment Land Study 2008 is a much later document. It has a key recommendation on page ii "we recommend that Rochford District Council adopts strong policies to protect existing employment land." Furthermore under recommendations for existing sites on page iii-iv of that document it states "In our view, Hockley Trading Centre is a strategically well placed employment location. However, we recognise the ambitions of the Hockley Town Centre masterplan and that within this the Council should consider it to be allocated for other uses. However, we recommend that this reallocation happen only if provision is made within the masterplan for office use within Hockley Town Centre as part of a mixed use scheme." The view of the writers of this document is clear - the Eldon Way Industrial estate (Hockley Trading Centre) is a good employment site and that it is for other reasons that alternative uses are being considered and only then if office development is supported. This supports our representations that new future uses at the Eldon Way site should be employment dominated and that alternative uses should relate to the objectives of the Town Centre which is to enhance the shopping and leisure facilities. Residential is not an appropriate alternative.

This document recommends the use of land to the west of Rayleigh for employment and envisages Green belt release. However, the SCS does not explain through the evidence base why existing employment sites should be 'deallocated' and Green belt land unnecessarily used.

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In addition to these key issues we have some specific concerns. As a consequence we maintain an objection to the second paragraph of Policy H1. This policy states that the Council will seek the redevelopment of various industrial estates including Eldon Way. The Policy says that alternative uses will be sought (presumably alternative to the existing employment offer) and that new land will be allocated elsewhere. This policy statement, in relation to Eldon Way in particular, is unsound for a number of reasons:

The emerging Hockley Area Action Plan consulted upon in 2008 states that the Eldon Way Industrial Estate is strategically well placed. In a sense this statement underplays the true importance of this highly sustainable employment location and only major employment area in Hockley/Hawkwell. The employment area is adjacent to the railway station and located a short distance from the main bus routes that run along Spa Road. Some of the residential areas of the town are also within walking distance of this commercial area, thus providing a potential for sustainable travel by employees. The Eldon Way Industrial Estate is therefore right at the heart of the settlement of Hockley/Hawkwell and provides an opportunity to meet sustainable transport objectives by reducing the need to travel by car. Consequently, this employment area should be highlighted as a premier employment site in sustainability terms, both in the context of PPG13, PPG4 and PPS6. To encourage alternative uses as set out in Policy H1 implies the removal of the majority of employment based activity at Hockley/Hawkwell and this would be contrary to National policy, would not be the most appropriate strategy when considered against alternatives and is therefore unsound.

Whilst it is acknowledged that improvement to the Eldon Way Industrial Estate can and should take place, the extent to which the mix of employment uses should be altered in favour of alternative land uses requires careful consideration. It is our view that a mix of existing or indeed new employment land uses with some Town Centre type uses should dominate the Eldon Way site. A mix of employment types between offices, light industry and other high technology industries should be encouraged as this will provide many locational advantages to the firms that agglomerate together. The Council says that the existing uses on this site are harmful to amenity. However, the site has operated for many years without any significant issues and if renewal for B1 type uses are encouraged then the employment area can be maintained without harm to amenity. Renewal of the employment stock can help develop and improve trade, improve the sustainability of businesses as a whole and make for a more flexible labour market as skill levels are varied. A singularly different use altogether or a variety of uses which excludes employment could undermine the long term sustainability of the area and Town Centre. As such Policy H1 is not an effective strategy and should be amended to acknowledge the importance of Eldon Way and the need to renew the employment stock to ensure that the site maintains its important role as a employment site, albeit with some ancillary alternative use development where appropriate.

The 2008 Retail Study notes that Hockley Town Centre is not strong and there is trade leakage. Eldon Way Industrial Estate provides a customer base for existing town centre uses. Weekday spending within town centres is an important contributor to the viability of many retail and leisure businesses either through expenditure by employees during the lunchtime trade or expenditure by employers, on necessary goods and services. This relationship helps sustain the critical mass of a centre and provides a platform for new retail and leisure growth. It is important to have a balanced centre with a variety of uses. Policy H1, as currently drafted, implies the removal of employment related development and this is likely to harm the vitality and viability of Hockley Town Centre. The Council has presented no evidence to suggest that this is not the case. Importantly, the 2008 Retail Study explains that there is a need for additional retail and office space. In principle we would support additional office and other B1 type uses plus retail but employment uses should always dominate for the sustainability reasons given above. Retail and office development are likely to present a viable alternative to some of the more industrial type uses.

Consequently, we do not support the phrasing of the third paragraph of Policy H1 and maintain that the most appropriate strategy is to seek renewal of the employment stock with employment based uses and with some new retail development. Removal of employment land uses completely as currently implied-which was the approach adopted in the emerging Hockley Area Action Plan - is not a justifiable strategy.

One of the key tests of a Core Strategy is consistency between policies in the emerging Plan and this strikes at the heart of demonstrating an effective strategy. Policy H1 implies alternative uses to employment and the relocation of Eldon Way to a site identified under Policy ED4. However, Policy RTC6 sets out a suite of policy criteria for Hockley Town Centre which includes employment and commercial activities. In addition Policy ED3 seeks the protection of sustainable employment sites (Eldon Way) and notes that some reallocation of existing employment sites will include a proportion of employment. It notes that in the case of Eldon Way employment development will form a component. The policies appear at odds with one another. The third paragraph of Policy H1 should be deleted as the second paragraph is sufficient to set a strategic context for delivering new housing development. The employment policies and Hockley specific policies should be left to consider the type and quantum of land uses appropriate in the area. If the third paragraph of H1 is to be retained then it should tie in more with Policy RTC6 and in our view explain that employment uses should dominate any redevelopment proposals for the Eldon Way site and that retail and leisure uses should be a supporting proportion.

Implementation, Monitoring and Delivery - page 132 onwards

One of the key tests of soundness is that the Core Strategy should be effective - it should be able to deliver its strategy. The Implementation strategy set out at page 132 onwards of the Core Strategy does not explain how Policy H1, RTC6 and the strategy for redeveloping Eldon Way (Policy ED2 and ED3) will be delivered. The comment at Policy ED3 on

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page 161 identifies it as a potential risk and alludes to land assembly difficulties and the choices to be made by owner/occupiers. In order to deliver the strategy there should be a clear understanding as to whether the new land use values being promoted are sufficient to encourage relocation voluntarily. Secondly there is a need for more information to be gathered and presented to show that current occupiers and landowners are willing to relocate and the timescales likely for this. For example, do the building lease contracts enable early review or are there any break out clauses. There should be some commentary on whether the Council will engage in compulsory purchase orders to pursue their strategy should the 'encouragement' route fail. As currently drafted there is no clear path to deliver the strategy and the danger is that despite reallocation, the sites identified for redevelopment will not come forward in the plan period. In this regard, evidence to satisfy the test of soundness is not provided.

Policy H2 - General Locations

We support the strategy that new housing growth should be targeted at land South of Hawkwell. This area is suitably located to the urban area of Hockley/Hawkwell and to tie in with the settlement tiers on page 40 of the Submission Core Strategy the same terminology for settlement should be used. This ensures a consistency within the SCS. The choice of this location as a housing growth area is appropriate as it would not contribute to the coalescence of the urban area with Ashingdon (there is existing development between this identified housing area at Rectory Road and Ashingdon and moreover, Rectory Road can form a natural physical boundary for the new Green belt boundary. This area is also well located to the existing road network. Cherry Orchard Way has recently been improved and provides much better accessibility to the proposed housing growth area than any other location around Hockley/Hawkwell. The existing bus routes along Rectory Road also make this location sustainable and the additional housing proposed will help underpin the financial viability of bus routes in this area. Locally there are employment opportunities, including the small commercial estate off Main Road. The Eldon Way Industrial Estate adjacent to the Town Centre also provides the opportunity for employment locally. Extensive public open space, play pitches and built leisure facilities are located just to the north of this area and a community hall is located off Briar Close, nearby. The area to the south of Hockley/Hawkwell is close to local shops on the corner of Heycroft Road and Main Road and there are numerous footpath links between this area and the local community including links via Thorpe Road, Thorpe Close, Briar Close, Hawkwell Park and Park Gardens. The area therefore provides the opportunity to enhance existing links, including cycle links, and contribute towards community integration - more so than other sites on the south side of this settlement. The site is also in the control of one house builder and deliverable.

However, we find that the Policy is not fully consistent with national policy and furthermore needs to be reviewed in order to be justified and effective. We have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with this policy and feel that Green Belt review should be more explicit throughout the SCS. We note that it is only Policy H3 which indicates the need for Green Belt land review. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H2 and certainly Policy H3 and Policy GB1 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary.

Policy H2 - Phasing and Quantum

The 2008 Preferred Core Strategy document indicated that the area south of Hawkwell should deliver 330 dwellings over a phasing period to post 2021 (see Policy H2 and H3 of that document). The SCS reduces the quantum of housing in this area to 175 but expects delivery by 2015. At a broader level the Preferred Options Core Strategy of 2008, (Policy H2) required 1,450 dwellings to 2015 and a further 1,050 by 2021. In the SCS the figures are now 775 and 1,010 respectively.

Since the SHLAA post dates the publication of the SCS, we are uncertain as to the reason why such a significant reduction in quantum of housing and extensions to the residential envelope is considered necessary. Presumably it is the 'new' strategy to redevelop existing employment areas within the settlements that has led to this change. Our representations on this strategy and specifically the Eldon Way Industrial Estate are included elsewhere within our representations. Previously we have commented on the Table at paragraph 4.6 of the Submission Core Strategy and the lack of evidence to underpin that table. It seems odd that in the space of a year the expected requirement for Greenfield sites has effectively halved on the basis of a SHLAA exercise. The community is therefore not able to effectively

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comment on the housing land supply and at this stage the Submission Core Strategy is legally unsound.

That said, we are of the view that the quantum of housing envisaged south of Hockley/Hawkwell should be more than the 175 currently envisage. In coming to this view we have reviewed the Urban Capacity Study and the latest housing figures in the Annual Monitoring Report 2008. We conclude that the shortfall in housing land supply is such that 330 dwellings in this location is appropriate.

The recently published SHLAA is based upon the data obtained from the Urban Capacity Study 2007, a call for sites exercise and data from the Annual Monitoring Report 2008.

The 2007 Urban Capacity Study (UCS)

1. 2007 is widely recognised as being the peak level of house prices in the UK and it was acknowledged by Government and practitioners alike that 2007 house prices were at an unsustainable level. It is our view that utilising the 2007 UCS as an evidence base without reference to the market does not pick up the depressed demand that is likely to now exist. Recent corrections to the housing market now mean that housing land prices are at a much lower and arguably more affordable level than before. The implications are that some pdl may not be viable for housing development. Often brownfield sites have much higher development costs than Greenfield sites and so the yield from urban capacity will be much lower than anticipated in the 2007 study. One example is the employment allocation of the Adopted Local Plan located at 76-92 Main Road, Hawkwell. This site has been allocated for several years and has been available during the most recent rises in residential property prices during 2006-07. As a consequence the lack of progress on the site can only be described by its current occupancy and perhaps it comprises high value uses that do not encourage redevelopment. Despite this the site is identified as having high potential for alternative use and high potential demand. The SHLAA form notes that there is no information on legal constraints (e.g., tenancy agreements) As a consequence it is difficult to see how this could continue to be a potential site and as a consequence the allowance for green field releases should be increased.

2. There are considered to be other instances in the UCS and the recently published SHLAA where the assumptions and calculations would indicate that the 1301 urban capacity figure is over optimistic and the SHLAA assessment is limited. In the assessment of 'non-residential sites in appropriate locations' within the UCS assumptions are made as to the probability of sites coming forward for new housing. 68-72 West Street, Rochford is identified as a high probability site but we note that it has been subject to 7 refusals of planning permission/conservation consent. There is a significant gap between the urban capacity identified as being suitable by the Council and the capacity applied for by the owners. Given its alternate use value, it is debateable whether the two capacity figures can be reconciled. No 247 London Road is another example of a site allocated in the Local Plan but which hasn't come forward. This is now the subject of a proposal for a care home and if approved would further limit the scope for market/affordable housing capacity on the site. A striking example of how the urban capacity study has underestimated is also evidence by 2-4 Alderman's Hill, Hockley - described as a disused service station. There has been no residential development application on this site since 2004 and most recent applications have sought commercial use of the site. Rather than being evidence of housing land deliverability, this particular site evidences the need for commercial uses in the area. There are therefore deliverability doubts over these 'high probability' categories which amount to some 40 units.

3. In relation to the assessment in the UCS entitled 'intensification of existing residential uses' we note that the assessment is premised on an assessment of recent trends taking into account net completions between 2001-2006 and 2005-06. This is effectively an assessment of windfall trends and not an approach that PPS3 encourages. Importantly Table 3-12 in the urban capacity study seeks to project forward urban capacity from residential redevelopment - a period that benefited from high house prices and PPG3 guidance encouraging redevelopment. These two circumstances have markedly changed and so the assumptions and conclusions drawn would also have changed. Even taking into account the UCS discounting, the reliability of the 404 units from this source must be questioned and in our view the 1301 figure cannot be a sound basis for urban capacity and further Greenfield releases are necessary.

4. In the section of the UCS entitled 'subdivision of dwellings' and 'living above the shop' it is estimated that recent trends would result in 7 and 15 units. Our concerns with using trends as a basis for urban capacity are detailed above - PPS3 does not encourage this. Rather, local authorities are charged with surveying their areas, identifying which areas may yield urban capacity and how much and developing policies to achieve that. Government guidance does not encourage the estimation of windfalls in the way the UCS does.

5. Redevelopment of established employment land is a separate section within the UCS. At 1 above we identify the low probability of the Main Road residential allocation coming forward. This remaining section of the UCS considers 11 further employment sites which were first identified in the 2000 UCS. Three of these are considered to have a high probability of coming forward. We have looked at these three sites and can find no evidence that they are likely to come forward. In the 8 years between 2000 and 2008 the three identified high probability employment sites have not been developed and there is no reason to assume that the next 5-10 years will be any different. For example the Rawreth Industrial Estate is identified as being well used in the UCS and although it has some unneighbourly uses there is no indication that the site is available, suitable or deliverable for residential. Land between 39-69 Lower Lambricks, Rayleigh is identified as having a high probability of residential uses. Yet there is no

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evidence of any pre-application advice or planning applications for this area. Stambridge Mills, Mill Lane, Stambridge is a further example. This site is separated from the urban area, in a flood risk zone and protected in the 2006 Replacement Local Plan by Policy EB9 which promotes B1 uses. Against this background there is only two relevant planning applications affecting this area both date from the early 1990's and relate to a plant room and loading bay. There is no evidence that this is likely to come forward for residential purposes in the next 5-10 years.

6. In the UCS extant permissions are identified as 856 dwellings. It is important to note that this figure needs to be continually reassessed so that from the point of adoption of the Core Strategy a 5 and 10 year housing land supply is available. The SHLAA notes extant permissions for 2009-14 being 106. As noted below extant permissions do not necessarily translate into deliverable sites. There is therefore a contingency that needs to be built in. Further allocations on greenfield land need to be increased and as such the quantum of housing in the area south of Hockley/Hawkwell should be increased to 330 dwellings in order to begin to meet the shortfall identified.

The District Council's 5 year housing supply assessment

7. The District Council's Annual Monitoring Report ("AMR") 2008 purports to demonstrate a 5 year housing land supply. The preamble to Table 4.10 in the AMR 2008 explains that Rochford District Council ("RDC") has included units under construction, units with full permission, units with outline permission, units with a resolution to grant, units subject to preapplication discussion/Urban Capacity Assessment and land allocations in its trajectory. The reader is referred to Appendix B which breaks down the sites in more detail. The recently published SHLAA also includes a table showing a potential 1273 dwellings deliverable. However, it refers to "appropriate brownfield sites." Since these 'appropriate sites' are do not benefit from an application or a planning permission it is difficult to programme them into the housing delivery trajectory.

8. In the full planning permission category of the AMR 2008 where work has not yet started there can be no guarantee that all these sites will be delivered in the 5 years. This comment relates to the one above in relation to the recently published SHLAA. It is not uncommon for permissions to be obtained to provide a means for valuing a site where the owner has no immediate plans to sell the site or develop housing. Delivery may also be hampered by funding constraints, or site assembly problems (where sites are in an alternative use or relocation constraints). Appendix B of the AMR 2008 does not set out the intentions of the landowner or whether the sites are truly achievable in the 5 year period as per PPS3 requirements. The SHLAA purports to show developer intentions at Appendix C but the assessment by the local authority into the legitimacy of some of the claims is not presented. The evidence base is not as full as it should be to demonstrate the robustness of Table 4.6 of the SCS. It is also unclear the extent to which this table is based on either the UCS 2007, AMR 2008, SHLAA 2009 or a combination of all three. This should be set out clearly.

9. In addition, to the 'non delivery' of a proportion of new homes in the AMR 2008, there is concern at the timings of delivery in that data set, for example, 10 units in 2008-2009 relates to outline planning permissions and it is doubtful whether reserved matters can be turned round quick enough to begin delivering housing in this year period. There could well be examples in that set of data where the delivery of units in the first year of the 5 is unlikely, thus delivery is reduced for that period and pushed back and this process is then compounded throughout the data set up to and beyond year 5. Statistical evidence from the Department of Communities and Local Government ("CLG") reveals that building starts are 43% down on the quarter to March 2009 compared with March 2008. It is not clear whether the recently published SHLAA has taken this into account and unless it does the data in the Table at 4.6 of the SCS cannot be relied upon, particularly given the current recessionary circumstances. In relation to the Table at Paragraph 4.6 a refinement is therefore needed to take into account this effect on phasing.

10. This problem is compounded for other units relied upon where permission has been granted but no start on site has been made; this accounts for a considerable number of sites in 2009-10 period (100 dwellings) which is (year 2 of the 5 year period). A delay in these will require more Greenfield sites to be identified in order to meet the shortfall.

11. Finally we note that the East of England Plan expresses its land supply requirement as a minimum. This strategy is not reflected in the

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Submission version of the Core Strategy policy H2.

12. In summary since neither the UCS nor the Annual Monitoring Report form a SHLAA, reservations are maintained about the degree to which sufficient housing land has been identified.

Policy H3

In the Preferred Options Core Strategy 2008 more locations were identified for housing growth in the post 2021 phase. Whilst it is our view that land south of Hockley/Hawkwell should benefit from a greater number of dwellings than the 175 currently identified (330) in order to make the strategy effective. We are concerned at the significant change in strategy between the Preferred Option Core Strategy and the Submission version, which has significantly less housing growth on green field sites. This change in strategy is so significant that we would question whether it is appropriate in the context of soundness and the consultation processes that have taken place so far.

We also have concerns as to how the Green Belt review strategy set out at Policy H3 and in the Local Development Scheme integrates with other policies in the SCS and feel that Green Belt review should be more explicit throughout the SCS. As it currently stands there is a potential conflict with national policies and limited justification for the Green belt strategy. We note that in Policy H3, which indicates the need for Green Belt land review, the advice is limited and unclear. In fact Policy H3 only pays lip service to the need for a Green Belt review and provides, at best, loose advice in this regard. It says that prior to 2021 Green Belt will be safeguarded save for the releases noted under Policy H2. Policy H3 then goes on to talk about land release for development after 2021 but no time period is set out to provide a framework for any Green Belt review in this latter period. In our view Policy H3 and Policy GB1/H2 should explain fully the need for a Green Belt review and that such a review should take place for a defined period. That such a review has not taken place in advance of the SCS is a serious matter for the Inspector to consider in the context of soundness. That said, it is considered that any review of Green Belt should have regard to a period beyond 2021 as indicated by draft Policy H3. Paragraph 1.9 of the East of England Plan explains "this RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term". 2026 is therefore considered a minimum suitable period that any Green Belt review must have regard to in order to meet the 5 year land supply requirements in PPS3 for the period after 2021. However, Policy SS7 of the East of England Plan talks about Green Belt reviews up to 2031. In view of this and the need to explore the circumstances of Rochford - that existing settlements cannot contain future housing growth; that Green Belt is necessary to provide housing; and that these provide exceptional reasons to vary the Green Belt locally (paragraph 2.6 to 2.7 of PPG2) the policies and strategy for the SCS should identify a Green Belt review covering the period to 2031 and set out why a review is necessary. Not to do so is unsound for justification and effectiveness reasons.

Policy H4 - Affordable Housing

As currently drafted we feel that the policy is not concise enough and that the policy does not reflect current guidance. The phrase 'at least' would indicate that in most cases affordable housing above 35% will be sought. Our understanding is that the 35% figure is recommended in the SHMA and that to provide a policy framework which seeks to go beyond that figure would potentially be unworkable as many sites could not financially bare the burden of over a third of the net developable area not yielding a value. The policy should be redrafted so that "a target of 35% affordable housing shall be provided on all developments of 15 or more units..."

The last policy paragraph provides some scope to relax this policy, if there are clear site constraints that make on site provision impossible. The policy, though, is not particularly clear on what would constitute exceptional circumstances. For example, physical site constraints, which unusually raise development costs, would be one such reason and this should be specified. There may be other reasons including the nature of housing needs in the part of the District the site is located which justify affordable housing below the 35% target. Design reasons may also have a bearing on how provision is made and in what form, particularly if the site is in an historic area where design might override housing need argument. It is therefore recommended that the policy expand on the type of circumstances where affordable housing may be relaxed and the type of information that will be sought of applicant's who have a need to invoke this part of the policy.

Policy H5

In support of the policy, it is advantageous that no percentages requiring a specific mix are included. This flexibility will enable developers and the Council to respond directly to changing circumstances in the local housing market. In the past some authorities have set out a percentage for the type of housing they require only to find that after a few years of strict implementation there is an oversupply of property of that type and no flexibility in the policy to address the problem.

Policy ED2 - London Southend Airport

It is considered that to grow non aviation related employment at a location north of Southend Airport where sustainable access from the rest of Rochford District requires careful consideration. Most Airports are serviced by aviation related employment development and as such a location close to the airport is sensible and sustainable. However, for surface access reasons it would be inappropriate to encourage travel from Rochford's main settlements to what essentially

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would be a rural location for general employment uses. Whilst sustainable access would be improved by a railway station and better bus links, there is no evidence to suggest that a sustainable surface access strategy for non related employment development at the Airport can be achieved. Paragraph 11.22 explains the critical importance of a railway station to the delivery of the strategy yet the Transport Chapter and Implementation Chapter provide neither a policy nor an assessment of deliverability. It is also notable that the South Essex Rapid Transit Policy T4, as set out at paragraph 10.16, notes that Rochford is not proposed to be served but may be served in future phases. This uncertainty is no way to plan for a major employment land supply strategy in the District. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley/Hawkwell, Rochford and Rayleigh is unsound.

Policy ED3

We fully support the first sentence of the Policy and note the apparent contradiction with the statements in Policy H1 and elsewhere which seeks to develop on alternative uses at industrial estates such as Eldon Way.

This contradiction is evidence in the second paragraph of Policy ED3. In our representations on Policy H1 we have explained why it is not sound to diminish the employment stock at Eldon Way and the importance of maintaining a dominance of employment type uses at this estate. These arguments are not repeated here.

We note the sentiments of the third paragraph and in accordance with our representations elsewhere are of the view that this sentence should be revised to explain that Eldon Way will accommodate principally employment type uses. As noted elsewhere uses which are an alternative to employment would diminish this highly sustainable employment site and this is unsound when assessed against National Policy.

Policy ED4 - Future Employment Allocations

In part, the de-allocation strategy is not supported as it is considered unsound when set against sustainability criteria. In relation to the Eldon Way Industrial Estate it is considered critical to the ongoing sustainability of this settlement that employment uses are maintained at this location. It is close to the railway station, bus routes and local residential areas from which the opportunity exists for employees to walk or cycle to work. Its location adjacent to the Town Centre offers opportunity for some retail and leisure development to complement the centre and to maintain a supporting function. These sustainable benefits would not occur with the deallocation of Eldon Way or the significant erosion of its employment floorspace. Whilst redevelopment of the employment site to achieve new employment is supported, the dominant land use should continue to be employment use. As a consequence, the 18ha of land required for employment in this policy is considered to be excessive and the policy should be reviewed to explain that redevelopment of existing employment sites for primarily new employment development will be encouraged.

Policy T4

It is noted that the South Essex Rapid Transit policy, as elaborated upon at paragraph 10.16 notes that Rochford is not served but may be served in future phases. This uncertainty is contrary to the delivery principles of soundness and directly puts at issue the employment land supply strategy in the District which is founded on sustainable access to new sites. In relation to PPS12, the ability to deliver sustainable green field employment sites away from the top tier settlements of Hockley, Rochford and Rayleigh is unsound.

Appendix H1, CTL1 - Infrastructure

It is recognised that necessary infrastructure provision is an important part of creating a sustainable development and in that context appendix H1 is supported. The supporting text notes that the table at Appendix H1 is not exhaustive and in that context it is very important that the framework properly distinguishes between what should be provided as part of new development schemes and what shouldn't. It is therefore essential that the framework acknowledges the importance of Circular 05/05 and the tests which say that provision of infrastructure and/or contributions should be:

- * Relevant to planning
- * Necessary to make the proposed development acceptable in planning terms
- * Directly related to the proposed development
- * Fairly and reasonably related in scale and kind to the proposed development
- * Reasonable in all other respects

As is made clear (Paragraph B9 of Circular 5/05) contributions should not be used to make good existing deficiencies in infrastructure provision. Nor are they to be used to secure contributions to the achievement of wider planning objectives that are not necessary for consent to be granted. In that context the Core Strategy should set this out as its policy framework.

Policy GB1 - Green Belt

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The objectives of this policy are supported, although as noted in other representations the SCS is unsound as it does not meet the tests in relation to justification, compliance with national policy or effectiveness of strategy.

Policy GB1 mentions the objective to allocate the minimum amount of Green Belt land necessary. The policy should link to the requirements of PPG2 and RSS which are discussed in relation to the representations on Policy H2 and H3. The policy should set out a timeframe for the review and why Rochford requires a Green Belt review (what the exceptional circumstances are in this District that justify a review of local boundaries. The policy should be amended to set out a 2031 time frame and this may require the SCS to have an extended life span beyond 2021.

We would recommend the deletion of the word character since Green Belt designation is not related to landscape character as currently drafted. For clarity we would also recommend that the Policy or its supporting text explain that a Green Belt review will take place in support of an allocations document (paragraph 6.6) in order to identify an appropriate new boundary. This is particularly necessary given the commitment to a Green belt review in the adopted Local Development Scheme.

Policy CLT1 - Planning Obligations and Standard Charges

In view of the need to test fully the basis on which standard charges are based it is important that any document produced is in a development plan document that enables an examination in public. The policy should explain this in order that when the document is produced it accords with Policy and is based on sound evidence.

ENV9 - Code for Sustainable Homes

Object. The advice from the Department of Communities and Local Government is that the new requirement to have a rating against the Code does not make it mandatory to build a Code home or to have each new home assessed against the Code. It does however mean that all buyers of new homes be given clear information about the sustainability of the new home. A house builder can do this in one of two ways:

- they can choose to build a Code home, have that home assessed against the Code and provide the home buyer with a Code certificate stating the star rating the home has achieved
- or, they can choose to build to current building regulations standards, not to pay for an assessment and instead download a nil-rated certificate of non-assessment (also referred to as a nil-rating) to provide to the home buyer.

As such the Rochford policy requirement that coding 3 be achieved by 2010 and Code 6 by 2013 is out of step with Government advice. The policy wording should explain that it is just the coding that is a requirement of new homes and not necessarily that new homes should be constructed to achieve a standard.

The current Government objectives are for the code to be introduced over a reasonable period with development to be code 3 by 2010, code level 4 by 2013 and code level 5 by 2016. In this regard the policy, as drafted, seeks to achieve code 6 by 2013 and consequently compresses the code requirements into a shorter time scale with the costs associated expected to be subsumed within the housing market through higher prices. This is not a realistic strategy for the delivery of sustainable homes and we consider that the policy should be revised to extend the period of compliance but to also make it more flexible based on local circumstances.

Research undertaken on behalf of the Housing Corporation and English Partnerships, published in February 2007 'A cost review of the code for sustainable homes' reveals that code 6 is unlikely to be unattainable given existing technologies and that achieving code 5 could result in a 12% to 20% increase in costs that would have to be passed onto the consumer. Given the variability of the housing market with peaks and troughs, it is unlikely that the housing market would be able to subsume this level of price increase.

The code system policy as currently drafted does not have regard to site circumstances and so many of the requirements could be difficult to meet. For example, micro electricity generation on site may be difficult to achieve where local circumstances deter the capture of wind or solar power. If more expensive technologies are required to generate power than is the norm then costs will rise. There may be other competing reasons why designs cannot include certain sustainability measures if housing sites are in sensitive landscape and historic locations. Alternatively there may be significant development costs associated with site specific circumstances and so viability of the site's development becomes a valid consideration. By insisting on the code for sustainable homes other policy objectives such as affordable housing at particular rates and other contributions may need to be reconsidered. Consequently, we are of the view that this policy should be drafted in a manner which enables site specific circumstances to be taken into account. As noted above the Government explains that the code is a certification requirement and does not necessarily mean that buildings are constructed in accordance with a code level.

It is also important to note that it is not the purpose of planning legislation to duplicate other legislation. In this regard, the policy should accept that the Building Regulations will be the main vehicle for implementing this policy and that unless the coding requires external development then there will be no need to specify what is to be carried out in a planning application.

Core Strategy Submission Document

O - 16918 - 10009 - Implementation, Delivery and Monitoring - i

16918 Object

CHAPTER 13 Implementation, Delivery and Monitoring

Summary: Implementation, Monitoring and Delivery - page 132 onwards

One of the key tests of soundness is that the Core Strategy should be effective - it should be able to deliver its strategy. The Implementation strategy set out at page 132 onwards of the Core Strategy does not explain how Policy H1, RTC6 and the strategy for redeveloping Eldon Way (Policy ED2 and ED3) will be delivered. The comment at Policy ED3 on page 161 identifies it as a potential risk and alludes to land assembly difficulties and the choices to be made by owner/occupiers. In order to deliver the strategy there should be a clear understanding as to whether the new land use values being promoted are sufficient to encourage relocation voluntarily. Secondly there is a need for more information to be gathered and presented to show that current occupiers and landowners are willing to relocate and the timescales likely for this. For example, do the building lease contracts enable early review or are there any break out clauses. There should be some commentary on whether the Council will engage in compulsory purchase orders to pursue their strategy should the 'encouragement' route fail. As currently drafted there is no clear path to deliver the strategy and the danger is that despite reallocation, the sites identified for redevelopment will not come forward in the plan period. In this regard, evidence to satisfy the test of soundness is not provided.

Change to Plan

Appear at exam? Not Specified **Soundness Tests** i

Core Strategy Submission Document

S - 16002 - 13441 - Key Diagram - None

16002 Support

CHAPTER 14 Key Diagram

Respondent: Go-East (Mr Richard Inman) [13441]

Agent: N/A

Go-East
Development and Infrastructure
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DF
01223 372775

Full Text: The Key Diagram provides a graphic overview of strategic issues across the district.

Summary: The Key Diagram provides a graphic overview of strategic issues across the district.

Change to Plan N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Core Strategy Submission Document

O - 16092 - 14154 - Key Diagram - i, ii, iii

16092 Object

CHAPTER 14 Key Diagram

Respondent: H R Philpot and Sons and Mr [14154]

H R Philpot and Sons and Mr
c/o Bidwells
Number One Legg St
Chelmsford
CM1 1JS

Agent: Bidwells (Mr Sam Metson) [14151]

Bidwells
Number One Legg Street
Chelmsford
Essex
CM1 1JS
01245 250998

Full Text: We support the Council's identification of Hullbridge as a growth location but cannot support the key diagram as the proposed extensions to residential envelopes pre and post 2021 are too site specific. The purpose of the Core Strategy is not to identify specific locations but indicate general areas for future development. The Core Strategy should identify land at Hullbridge as a growth location and not specifically land South-West of Hullbridge. Fundamentally, the detailed locations and quantum of development should be tested through and articulated within the Allocations DPD.

We consider it appropriate for the Key Diagram to indicate locations for new open space, parkland and riverside walks which should be assessed in terms of feasibility. There are opportunities for Hullbridge to be enhanced with the introduction of high quality public open space, parkland and riverside walks as well as appropriate links to facilities such as the local infant and primary school which would be essential elements of an extension to Hullbridge.

Summary: The proposed extensions to residential envelopes pre and post 2021 are too site specific. The purpose of the Core Strategy is not to identify specific locations but indicate general areas for future development. The Core Strategy should identify land at Hullbridge as a growth location and not specifically land South-West of Hullbridge. Fundamentally, the detailed locations and quantum of development should be tested through and articulated within the Allocations DPD.

The Key Diagram is missing the opportunity to identify opportunities for public open space, parkland and riverside walks which also exist at Hullbridge, particularly to the West.

Change to Plan The Key Diagram should identify Hullbridge as a growth settlement but should not identify the location for growth in relation to the existing settlement at this stage. The Core Strategy should also indicate how the open space needs of new development in Hullbridge will be accommodated alongside housing growth.

Appear at exam? Yes **Soundness Tests** i, ii, iii

Core Strategy Submission Document

O - 16465 - 7507 - Key Diagram - ii

16465 Object

CHAPTER 14 Key Diagram

Respondent: Mr S Welsh [7507]

Hanover Land Trust
35 Castle Road
Rayleigh
Essex
SS6 7QD

Agent: N/A

Full Text: We consider the DPD is potentially unsound depending on the final selection of specific sites or site in South West Hullbridge.

Please see attached statements 1, 2, 3 and 4 evidential statement.

The precise wording should correlate to the proposal of the attached statements, although the issue may be resolved by publication of the allocations development plan document.

Oral participation will depend on whether the proposed site is included in the allocation development plan document for specific sites for future development, if the proposed site is included oral participation will not be required or necessary.

Summary: We consider the DPD is potentially unsound depending on the final selection of specific sites or site in South West Hullbridge.

Please see attached statements 1, 2, 3 and 4 evidential statement.

Change to Plan The precise wording should correlate to the proposal of the attached statements, although the issue may be resolved by publication of the allocations development plan document.

Appear at exam? Yes

Soundness Tests ii