

Draft TGSE EIP Response

Matter 8(B)

(i) Vision and Strategy:

Does the Plan communicate a clear, sustainable and appropriate vision/strategy for the area as a whole and for its main constituent parts?

The Panel has described the constituent parts of the Thames Gateway/South Essex sub-region as, "Thurrock Riverside, Basildon/Castle Point and Greater Southend". This description is simply not acceptable. Rochford is NOT part of "Greater Southend". Paragraph 5.6 of the Plan makes it very clear that Rochford is one of the districts in South Essex.

As a district Rochford has a rural feel and this contrasts markedly with the urban environment in Southend. The requirements for Rochford differ significantly from Southend and this is reflected in the role Rochford can play in the Thames Gateway.

The vision and strategy for South Essex is an articulation of the Thames Gateway South Essex vision and strategy, which reflects the national priority for regeneration.

The vision and planning framework is clear, sustainable and appropriate and positively builds on the needs and priorities for South Essex as a national priority area.

The vision is one of employment-led regeneration compiled with the provision of improvements to the strategic and local transport network. The strategy accepts the requirement for additional housing provision, but the strategy is not housing-led.

Significant numbers of additional houses, without new infrastructure, will simply not be sustainable.

Regeneration through jobs-led growth and investment in the infrastructure deficit is the key to achieving a more sustainable balance between local jobs and workers.

The vision for South Essex has been very carefully considered by all partners and reflects on what is achievable and realistic and seeks to avoid the mistakes of the past where new housing development has not taken into account the structural limitations of area.

(ii) Environment/Culture:

Does the Plan adequately reflect the sub-region's environmental capacities and cultural assets and identify any sub-regional opportunities to secure

more sustainable development through recognition of/linkage with those assets?

Environmental capacity

There is not doubt whatsoever that limits exist on the environmental capacity of Rochford to accommodate new development.

Aside from the MOD land in the east, all of the district outside the built up areas is allocated as Green Belt.

The majority of the coastline has protective designations.

Substantial parts of the district are also at risk from flooding.

Therefore the environment in its broadest sense imposes significant limitations on future development.

Furthermore, whilst there is a debate about strategic transport improvements and connectivity, there is little doubt that internal local improvements will be limited in the future. On that basis, the regeneration focus of seeking to bring more balance into local jobs is appropriate rather than focus on substantial growth which will never be sustainable within a locational context.

Rochford is identified as part of the cultural and intellectual hub of Thames Gateway South Essex with particular opportunities for leisure and tourism. There is no doubt that the rural environment of much of the district with its long coastline coupled with an extensive built heritage including two mediaeval towns, a Norman castle, many listed buildings does present significant opportunities for regeneration within a culture, leisure and tourism context.

(iii) Employment/Economy:

Are the proposals for the sub-region based on appropriate assumptions and achievable proposals?

London Southend Airport

Rochford Council positively supports the contribution that can be made by the airport to the economy of South Essex. The framework recognises the importance of surface access improvements particularly in relation to road network linkages.

(iv) Housing:

(a) Are the proposals for the sub-region, including the district level distributions and phasing, appropriate and achievable?

It is Rochford's view that, taking account particularly of the environmental constraints on the district including protective designations and flood plains and the green belt, the housing allocation proposed in Policy TG/SE6 is realistic and achievable.

However, there is no doubt whatsoever that any significant increase in the figure would result in there being a substantial impact on the green belt.

The proposed phasing reflects the need to see infrastructure and employment provision substantially in advance of the main tranche of new housing.

The level of housing proposed should enable the district to make an appropriate contribution towards the requirement for affordable housing. In any event, the type of housing provided will need to be carefully considered in accordance with updated housing needs analysis.

(b) Are distributions based on sound district level assumptions about previously developed land and urban capacity?

Yes, the allocation is intended to reflect the limited scope for further significant development within the two main market towns in the district. These towns are already intensively developed and there are few previously developed sites with scope for major new housing schemes.

Rochford is essentially a rural district and housing capacity must necessarily be balanced against the protection of that rural character.

(c) Do the identified broad locations cover those that are both appropriate and truly regionally strategic?

The broad locations of new housing in the Plan period will in Rochford, be determined by the Allocations DPD. Given the scale of the provision; the environmental and built environment constraints discussed above it would not be appropriate for there to be any broad locations identified in the district for strategic housing provision. Future housing provision must cater for local needs.

(d) Should the Plan identify any alternative or additional strategic locations?

It would be wholly inappropriate and unacceptable given the location and character of Rochford district to identify any strategic locations within the district.

(e) Are there exceptional circumstances for reviewing the Green Belt and, if so, is appropriate strategic guidance provided for taking land into or out of the Green Belt?

Rochford is not opposed per se to a review of inner green belt boundaries: this will be required to enable appropriate decisions to be made about future housing allocations to fulfil local needs.

That having been said, Rochford is wholly opposed to any requirement to identify land for development beyond 2021 and to any review that would seek to change the notation on substantial areas of Green Belt in an attempt to identify new development land for strategic scale development.

(v) **Key Infrastructure:**

(a) Are the key items required to deliver the sub-regional strategy correctly identified?

It is Rochford's view that in broad terms this is the case, though it is also accepted that some transport infrastructure, for example, is closely tied to specific development or investment programmes.

(b) Are they achievable?

The identified costs for new infrastructure are substantial and some will certainly be dependent on the market, without public subsidy.

New housing development can make an essential contribution towards the provision of infrastructure, but the challenge must be to see new infrastructure in advance rather than after housing is completed.

Furthermore, transport infrastructure must be focussed on improvements to public transport and mass transit systems within South Essex in order to promote modal shift and this will require a different culture of investment, moving away from the traditional notion of road building as the solution to movement issues.

(c) Is it likely to be possible to reduce the level of net out commuting to London, and is this compatible with giving priority to the proposed rails improvement schemes?

There is no doubt this poses a significant dilemma. Improvements to heavy rail are unlikely to benefit passenger movements within the sub-region, but rather will improve the ease of movement to London.

This is the opposite effect that is actually required if the regeneration strategy is to be successful.

There is little doubt that the strong pull of London as a work location will continue to influence work patterns in South Essex. The existing heavy rail arrangements provide an excellent level of service to London on both main lines. It is arguable that any improvements could be justified, certainly outside the ring of the M25.

If, on the other hand, improvements are made to local infrastructure to assist movement within the sub-region and this is combined, as outlined in the strategy, with better value employment opportunities the strategy will reduce the level of out commuting. The strategy could not realistically prevent out commuting to London, but retaining some of the skilled and experienced people who currently commute will substantially benefit and support the growth and development of local businesses.

(vi) **Delivery Arrangements:**

The delivery approach in the sub-region is very clearly outlined in the Plan, particularly the role of the LDVs.

There may certainly be a need for joint Local Development Documents though at the moment no decisions have been taken about where these might be required. That having been said, Southend Airport straddles the boundary between Rochford and Southend and joint working has been in place for some time.