

Response to Proposed further modifications to Policy S2 and relevant supporting text following discussions on Matter 6 in relation to Reserve Sites

Matt Clarke on behalf of RHS

15th March 2015

These submissions are made further to previous representations and statements, and in turn discussion at the Matter 6 session relating to the proposed allocation of a number of Reserve Sites in the context of Policy S2. The RHS owns land that forms part of the proposed Reserve Site RE3 at Burnham on Crouch.

Within our previous representations it was considered that the proposed policy approach to, and trigger mechanisms for release of, the proposed reserve sites was originally unclear and that the previous proposed modifications were a step in the right direction, but had also lacked clarity. It is noted that the Inspector sought further clarification on the application of this aspect of Policy S2 at the close of the Matter 6 session.

However, it is felt that removal of the proposed reserve sites entirely represents a drastic measure that extended far beyond what was being sought by the Inspector, and that the plan is not necessarily strengthened as a consequence.

In particular it is considered that there has been a lack of explanation for these actions, which have not therefore been fully justified as a consequence, whether any alternative options were explored and whether any alternative provisions are to be made in order to provide the flexibility that is required by the NPPF.

The RHS remains committed to bringing forward its portion of site RE3 in accordance with any appropriate mechanism put in place as part of the plan making process, whether this would be within or beyond the Plan Period.

At the very least, in the context of proposed modifications to the supporting text, it would be beneficial to recognise the potential of the site as being a suitable and sustainable development option which should be prioritised for consideration within any subsequent review in order to expedite the site selection process, given the acceptability in principle already acknowledged for the site. This would be consistent with the suggestion within the proposed modification to supporting text that a fast-track partial review of the plan would be triggered if monitoring revealed a shortfall after the initial 3 year period.

Equally the RHS considers that alternative options are available for the delivery of additional capacity at the proposed allocation sites, as set out in previous submissions and at site S2 (j) in particular. Positive assertions in this regard, subject to adequacy of infrastructure capacity, will provide the flexibility required by the NPPF in a more responsive manner.

In respect of reference to schools capacity it is noted that the emerging Burnham on Crouch Neighbourhood Plan, which is currently out for consultation, suggests that further options exist for expansion of school places, not only through replacement of a temporary class base at St Mary's Primary School in line with the Local Development Plan, but additionally through extension of the Burnham on Crouch Primary School onto adjacent land.

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