



CANVEY GREENBELT CAMPAIGN

Submission on the
Response to the Revocation
of the
Regional Spatial Strategy
and Changes to PPS3
CP/ADD_EV/001

The new Government's Localism Bill is progressing through Parliament. We believe, that this Borough Council's desire to continue with their original plan to develop major areas of West Canvey does not reflect the best interests of the local community. To stubbornly press forward with this Core Strategy so as **"to not waste the amount of work"** previously carried out does not justify the resulting implications or risks. We had cause to write to the Government to express our concerns regarding this Council and received this reply:-

"Dear Mr..... ,

Thank you for your E-mail of 7 July to the Rt Hon Eric Pickles MP about Castle Point Borough Council's core strategy. This has been passed to me to respond. The government is committed to reforming the planning system to give neighbourhoods far more ability to determine the shape of the places in which their inhabitants live. I am not able to comment on individual local authority's procedures in bringing forward their core strategies but can tell you that it is a matter for the local community in collaboration with Castle Point Borough Council to continue to identify development opportunities. In preparing core strategies, local authorities should demonstrate that the most appropriate options come forward when considered against reasonable alternatives and show that the views of the community and others with an interest in the area have been considered."

***Martin Bridgman
Local Planning Branch
CLG
Tel: 0303 444 1652***

The Canvey Green Belt Campaign Group, in our communications with the Borough Council, have noticed no acceptance of the points of concern we have raised nor have we had any impact or input into the Core Strategy Document. Any collaboration between the Council and local community has not resulted in any appropriate options being adopted, as far as Canvey Island is concerned.

In the light of our Referendum, in which of over 6,500 Residents participated and 99.13% expressed a desire to oppose further development of Canvey Island's Green Belt, and in the Canvey Island Town Council's continued opposition to the Core Strategy plans, we remain unconvinced that the Borough Council have the safety and well being of the residents of Canvey Island amongst their foremost concerns. To propose development in a Flood Risk Zone 3A area, recognized as being at **"actual risk"** of flooding, ahead of exhausting all of the other possible development sites does not reflect the sentiment of the Government's proposals.

The Mid-Examination Response to the Revocation of Regional Spatial Strategies and Changes to PPS3: Housing Document's primary function is to justify the view of

Castle Point Borough Council's proposal of housing numbers, and the establishment of an appropriate and acceptable level of local housing needs, following the revocation of the East of England Plan.

We, the Canvey Island Green Belt Campaign, maintain our stance that the housing distribution has been established by questionable means and overwhelmingly directed at one area of the Borough, notably Canvey Island. We suggest this is being planned in such a way so as to minimize disruption to the Mainland towns, to an extent that if successful it would be detrimental to the well being and safety of Canvey Island residents. The many reasons for which we have endeavored to explain within our many submissions has been made clear by this document that the Council was not confident that sufficient regard had been given to the environmental capacity of the borough with regards to the targets previously set by the East of England Regional Assembly, never the less it has considered its position and decided to maintain the level established by the Assembly.

In the circumstances the council has considered it appropriate to revisit this issue of housing needs in the borough, to determine whether the numbers in the Core Strategy were still appropriate, irrespective of the status of the Regional Spatial Strategy, and continues to consider the issues under the following headings

- Housing needs and demands.
- Environmental capacity.
- Relationship between the district and neighbouring areas.
- Economic development and regeneration.
- Infrastructure.
- Delivery.

Housing Needs and Demands.

The housing requirement for Canvey Island has been based upon a number of factors. Demographic growth is seen to have a zero net migration with regards to the existing population.

If the Core Strategy is therefore driven with regards to providing homes for new residential migration it seeks to perpetuate further urbanisation and leading to greater demand on local resources without proper consideration for the existing population. The recognition that deprivation can be readily identified in areas of Canvey is an indictment that Castle Point Council has in part neglected basic needs in its community and making the assumption that a further introduction of migratory housing occupiers will alleviate deprivation is fundamentally flawed. The likelihood that developers can adequately contribute to affordable housing requirements is debatable and the community levy scheme will find itself struggling to quantify a return from developers given the cost of complying with PPS25 requirements.

For the Authority to justify the house requirements it has to seriously consider where it proposes to develop in other Parts of the Borough especially when considering the viability for developers to provide towards affordable housing requirements. Canvey Island is already deeply urbanised and development has to stop at some time. In the interests of the community that time has arrived, and we are in agreement that the

Council should reconsider once again the environmental capacity of the Borough and not look for the least palatable options.

“The revocation of the East of England Plan provides a welcome opportunity to reconsider the total housing numbers to be accommodated within Castle Point. Whilst the numbers in the East of England Plan for Castle Point were informed by consideration of projected needs and demand, though accepting that Castle Point is not an appropriate location for housing growth.”

This comment should give good reason for the Council to think again about its proposals and not be tempted by Government initiatives and rewards for providing housing in excess of the local sustainable circumstances.

Environmental Capacity and Physical Constraints

“During the Examination in Public of the draft East of England Plan, concerns were raised by some participants that the scale and location of development proposed in the draft would exceed the capacity of the region to accommodate it, particularly in terms of environmental limits. As a result EERA commissioned Land Use Consultants and Cranfield University to produce a study examining this issue entitled Environmental Capacity in the East of England Draft (published June 2007).

This study noted that there is not even a clear understanding of what is meant by environmental limits, let alone how impact on these can be measured. The study suggested that in fact what constituted a “limit” may be somewhat subjective. It suggested a methodology to be applied to determine environmental capacity, but neither it nor any other subsequent studies were produced which robustly concluded that the quantum of development proposed for the region were acceptable in terms of environmental capacity.”

Accepting that setting these limits are far from an exact science on paper, local knowledge should be afforded input and respect. Traffic congestion during peak times, daily commute and weekend, together with residents’ quality of life and well-being with the proposed reduction in green open space on Canvey Island are also major factors for consideration.

Being located in a Zone 3a Flood Risk area with the updated SFRA documents provided by the councils consultants Scott Wilson which now warn of overtopping, increased breach depth and faster inundations times confirming a safety issue across the whole of Canvey Island and the southern most part of Benfleet. Access and Egress issues for emergency planning are also of grave concern, with all routes leading to Waterside Farm Roundabout. The road layout with its single access point would cause problems in itself for Emergency Services should a flood or incident at the two Hazardous Industrial sites occur. The sea wall defences barriers and gates themselves need considerable investment to maintain their integrity throughout the life span of future development and without an underwritten guarantee from the Environment Agency the sustainability of the long-term future occupation of Canvey Island poses questions.

The sea wall realignment, to deal with coastal squeeze and provide the flood management programme needed for long-term flood water catchments, has not been fully considered by the Core Strategy or fully assessed by Scott Wilson.

The Planning Authority now admits to recognising that development on open recreation spaces will cause further impact on nature conservation areas, non more so than on Canvey Island. The loss of open space and sports pitches will have untold impact on SSSI areas of Canvey, areas already suffering from misuse and proposed industrial development. The proposed continued expansion of the urban area will have a negative impact on environmental sustainability. The sewage and rainwater piping system are seriously undermined with the existing load already demanded by the current population. Sewage treatment works along the Thames will require increased capacity to accommodate growth to prevent causing harm to the natural environment.

Relationship between Castle Point and Neighbouring Areas

“The Strategic Housing Market Assessment 2008, as updated 2010, ascertained that South Essex is a single, functional, sub-regional housing market that can be defined as stretching from the M25 along the Thames Estuary to Southend and Shoeburyness. There are strong inter-dependencies between the towns in the sub-region in terms of both household movement and travel to work patterns, which support the identification of this area as a housing market.”

This indicates a housing development future that will eventually mirror the dense urban development of East London and Southend. The mainland towns will consistently be fighting to prevent future development and should consider the position of Canvey Island, not in isolation as exists now, but as part of one entity that if properly managed can be viewed as an asset to the borough. As unpopular as this appears to be with the Mainland Community, Canvey given its problems, should not be used to alleviate politically motivated agendas affecting housing development proposals within the Borough. Collectively with the will of our local politicians we need to allow the local community to have a say in planning decisions that shape our own future.

Travel patterns are clearly dictated by the economically essential access by road and rail to employment destinations outside of the borough. All parts of the borough suffer from this necessity causing a high reliance on private car use. Planners have to come to terms with the fact that the provision of local low paid employment will have an insignificant effect upon vehicle use when considering employment migration to neighbouring areas and beyond. Subsequently to suggest that the proposed, limited local employment increase, alongside the proposed significantly increased housing numbers will reduce overall congestion, is unfounded.

Economic Development and Regeneration

The London Gateway Port, Southend Airport expansion, the significant growth planned for Basildon and Southend are all quoted as providing opportunities that, for the migrant work force of Canvey Island, may be of some advantage. However how this can be equated to additional housing needs for Canvey residents is questionable, with the alignment between employment and housing facilitating the development of a more sustainable community supporting local ambitions for the regeneration of town centres such as Canvey and Hadleigh is some what ambitious.

Infrastructure

“The responses from service providers have made it clear that the requisite infrastructure to support the levels of development set out in the Core Strategy can be provided.”

Given the state of the economy and the condition of the local area’s facilities evidence needs examining. Drains in various areas do not function, whilst the relevant authority’s representative stated during the Examination in Public that there was no outstanding works, until challenged by a local Councillor. Drains, dykes and ditches remain silted and perform below capacity given Canvey being situated within Flood Risk zone 3. Canvey Way upgrading remains low on the Borough Council’s priority road upgrade list.

“It is however pertinent to note that other areas in the housing Market area particularly Thurrock, Basildon and Southend have greater local provision of services facilities, cultural and social infrastructure and, based on recent trends are likely to be the recipients of relatively greater levels of infrastructure in the future”

Funding, and the ability of Castle Point Borough Council and other partners to deliver infrastructure has not been fully identified throughout the Core Strategy. Several of the policy changes, and the forthcoming Canvey Plan, rely heavily on the funding for infrastructure. Clearly the dependency on developer contributions is unsustainable given the low profit opportunities of Canvey developments. The suggestion that you cannot have regeneration without large-scale housing development is unsound. The delivery of infrastructure is always going to be a constraint and the council has simply provided a shopping list of desired options that may never be attained.

Deliverability

The Canvey community are growing to be disillusioned with the idea of regeneration of it’s town centre on the basis of loss of other amenities in order to support funding. Without properly identified funding the Core Strategy remains unrealistic with the vision, policies and proposals within-it being deliverable, without the imposition of loss of Green Belt and flood plain provision. Any such a document is unlikely to meet the test of soundness.

“Having regard to delivery in the period 2001 to 2008, and considering the current economic climate and the bleak projections of some economists, it is likely that if the Council continues to pursue a dwelling provision rate of 200 dwelling units per annum it will be unsuccessful. This will having implications for the delivery of the Core Strategy in respect of its objective to protect the Green Belt from inappropriate development, which in turn will have implications for its ambitions to regenerate town centres.”

The Planning Applications recently lodged in the Borough by two high profile developers draws the above statement into question. The applications will also prompt close scrutiny into the Councils scoring and assessment process employed when selecting the borough’s Green Belt sites. Whilst the council promotes the Town Centre re-development it also promotes the development on Canvey Green Belt and Flood Plain. However, unlike

Hadleigh, the proposed Canvey Green Belt development proposal seemingly has no implication on the Town Centre regeneration.

Overview of the implications of the revocation of the East of England Plan.

“ This proposed change would deliver the same overall quantum of homes as set out in the Core Strategy submission, but provides flexibility around the annual rate of delivery, recognising that Castle Point is not a key growth location, but a peripheral location focused on meeting its local needs. Flexibility around the annual rate of delivery is important for Castle Point, because it is a small area that has not previously delivered at high rates. Excessive pressure to do so would undermine other objectives of the Council and its partners to regenerate town centres and protect the green belt and the natural environment from inappropriate development. On these bases, the five year housing supply figure should be no less than 750 homes and no more than 1,000 homes. This is considered to be a more realistic and deliverable approach to dealing with a complex issues such as housing, that is flexible enough to deal with highs and lows in the housing market. The economic recession may continue to impact on the delivery of this target during the period to 2016.”

Quite clearly it was correct for the Canvey Greenbelt Campaign Group to highlight the projections of the previous Core Strategy document as being undeliverable, unwelcome and therefore unsustainable. This amounts to a major climb down for the Borough Council and a cause to further question its objectives. The two major re-developments of the Cornelius Vermuyden and Castle View Schools by a major developer were allowed with the promise that local labour would be employed. The Castle Point Cabinet voiced their disappointment that this condition had been ignored, as they are powerless to implement the condition. Should the Planning Inspector approve the Core Strategy in its current form Castle Point Council will promote the development in the Green Belt area of West Canvey. This scale of development in turn will harm employment prospects of local builders / developers, who in turn have suffered under the mistaken belief that a building moratorium is in place on Canvey Island. Efforts should be made into educating the local building traders on conforming to Environment Agency guidance on building on brown field sites in the flood plain. This in turn will see development conform to Planning Policy in as much that large development will be guided away from flood plain

Implications for the Green Belt.

“It is therefore considered appropriate for the Core Strategy to enable the identification of some land in the Green Belt to provide a more varied land supply in some locations. It is also appropriate to amend the Core Strategy to enable the identification of contingency sites and safeguarded land in subsequent documents, as per the requirements of PPG2, in order to ensure that the general extent and strategic function of the Green Belt is protected, whilst ensuring the Core Strategy is adequately flexible to deal with unexpected circumstances.”

What is not appropriate is for the Canvey Island Green Belt to be selected for development by a closed-doors political process, as we have identified, and as conceded by Officers during the Examination in Public. This one act calls into question the whole integrity of the Council and their handling of the Borough's Green Belt and compilation of the Core Strategy document.

Conclusions

“There is a need for new homes to accommodate demographic change and household growth in the existing population (Zero Net Migration).

There is a need to provide some new homes to maintain a reasonable level of economically active population in the borough”.

These conclusions have been challenged by this submission however there is evidence to suggest that outside Agencies are re-locating people into rented accommodation on Canvey Island adding a financial burden and responsibility onto the local Council services. This indicates that there are in fact empty **“dwellings”** on the Island. Many people are being encouraged to relocate onto Thorney Bay Camp where residents have only just recently been deemed liable for payment of Council tax. This site is within the Consultation distances of the Calor Top Tier COMAH site and as such vulnerable residents are at risk from an industrial incident and the incompatibility of a Zones 3A Flood Plain and should be controlled by a variety of agencies, never the less they are **“dwellings”** and as such should be accepted into the housing allocation. The term **“dwelling”** was agreed to be adopted when referring to housing units at the October meeting between Officers and the Special Policy and Development Group.