

ROCHFORD DISTRICT COUNCIL

CORE STRATEGY EXAMINATION

PLANNING POTENTIAL ON BEHALF OF FAIRVIEW NEW HOMES

MATTER 1 – SPATIAL VISION

Representation Reference Number – 16609

Core Strategy Vision

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Fairview New Homes have an interest in a parcel of land to the South West of Raleigh Town Centre, as indicated on the attached site location plan. This location has been identified in the earlier stages of the production of the Core Strategy as a suitable location in which to provide an urban extension to the south west of Raleigh to accommodate growth.

To summarise our comments, Fairview New Homes strongly object to the Core Strategy as is currently presented on the basis the document is unsound for a number of reasons:

- The lack of robust and credible evidence base
- Failure to clearly discount reasonable alternatives
- The effectiveness of the plan is also considered to be flawed and the Council's approach to deliverability and flexibility is questioned.

Each of the issues identified for discussion at the Examination are intrinsically linked and, therefore, our comments set out below should be read in conjunction with each other and particularly those representations submitted in respect of Matter 2.

A - Does the Core Strategy present a clear vision for the District?

These representations are submitted on the basis that the Vision for the District consists of the overall visions and topic specific visions and objectives as established at Paragraph 3.3 of the Core Strategy.

Whilst it is considered that the visions set out in the draft Core Strategy are clear there is limited information provided as to how these visions are to be achieved through the associated objectives. This is particularly true of the housing vision and objectives set out in Section 4.

B - Will it deliver sustainable development in accordance with national and regional policy?

On behalf of our Client, we are concerned for a number of reasons that the Core Strategy will be unable to deliver sustainable development in line with national and regional policy. These concerns relate primarily to the approach taken to the allocation of strategic housing locations as well as means by which the release of Green Belt land has been addressed in the Core Strategy.

The approach taken to the proposed release of Green Belt is not considered to be in line with the guidance set out in PPG2, particularly that at Paragraph 2.8. Specifically, it is not considered the proposed release of Green Belt land has been determined to ensure the future endurance and permanence of the Green Belt boundary. The Core Strategy does not offer sufficient certainty that the strategic housing locations, particularly those to that are reallocated employment land. On this basis, it is not possible to gauge whether sufficient Green Belt land is proposed to be released and therefore, further ad hoc Green Belt releases may be necessary to overcome the District's constraints and meet the RSS housing targets. Our representations in response to this aspect of the Core Strategy should also be read in conjunction with our submission in response to issue 'B' of Matter 2.

C - Is the approach in the Core Strategy consistent with the requirement in Paragraph 4.5 of PPS12 that the core Strategy should make clear spatial choices about where development should go in broad terms?

Whilst the direction of strategic development is identified in the draft Core Strategy the Plan lacks transparency to understand how the directions for growth were established. The choices made by the Council in determining appropriate strategic locations do not appear to be founded on a solid and robust evidence base, in this respect we do not consider the Core Strategy to be consistent with the aims of PPS12.

In addition, the Core Strategy lacks clarity in terms of the spatial choices made as to the direction of housing to existing settlements in the District. 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 no detail is provided as to how the Council intends on implementing this balanced approach or how the strategic allocation of housing contributes to the balance.

The proposed distribution of housing development during the Core Strategy plan period does not appear to be proportionately allocated between the various settlement tiers. We would argue development should be distributed proportionately in line with the size of the settlement in order to benefit from available services and facilities and thereby maximise the sustainability potential of these settlements.

Rayleigh is recognised at Paragraph 2.68 of the Core Strategy as having the best access to services within the District. On this basis it is considered that

development should primarily be directed to Rayleigh with a proportionate level of housing allocated to the remaining settlements in the District.

D – Does the topic based approach hinder the expression of a spatial strategy to an unacceptable extent? Should the topic based visions be drawn together to provide a strategic spatial policy so as to provide a clearer picture of the intended development pattern?

It is considered a topic based approach to the Core Strategy is acceptable. However, it should be recognised that certain areas of the Core Strategy are intrinsic to each other and the visions in these instances would benefit from being drawn together to offer a greater level of consistency and ensure the overall vision for the District is met. For example, housing, employment and Green Belt development visions and objectives are fundamentally linked as a result of the need to release Green Belt and employment land for residential redevelopment.