



ROCHFORD DISTRICT COUNCIL

CORE STRATEGY EXAMINATION

PLANNING POTENTIAL ON BEHALF OF FAIRVIEW NEW HOMES

MATTER 2 – LOCATION AND SUPPLY OF NEW HOMES

Representation Reference Numbers 16609-16613

Housing Vision, Policies H1, H2 and H3 and supporting text

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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. These locations have 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 Rayleigh 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.

A – Will the strategy deliver the number of new homes required to meet the RSS requirements?

There is currently too greater level of uncertainty associated with the Council's approach to providing new homes in order to meet the RSS requirements and direct growth within the District.

Policies H1 and H2 are key to ensuring the delivery of the required new housing in the District and at present do not offer sufficient reassurance that the necessary housing can be delivered on the strategic sites/locations identified.

At present housing development in the District is highly reliant on the reallocation of employment sites for residential purposes. Whilst the redevelopment of brownfield land is favourable and in line with guidance set out in PPS3, each of these sites present a number of constraints which will need to be overcome in advance, such as flooding and contamination issues. This is in addition to the provision of a significant level of infrastructure requirements, as indicated at Appendix H1 of the Core Strategy. Furthermore, the reallocation of the identified employment sites are dependant on new employment land allocations identified in Policy ED4. Each of these factors will clearly influence the timely deliverability of the sites identified in Policies H1 and H2 and consequently the ability for the District to meet the RSS housing requirement. Reliance on the redevelopment of brownfield sites should not be pursued if this is an unrealistic approach to securing the new housing required by the RSS.

There is currently limited detail contained in the Core Strategy as to direction of housing to existing settlements in the District. It is stated at Paragraphs 4.10-4.12 that the Council has 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 intends to implement 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 provided in order that it can be understood the proportion of housing that is to be allocated to each settlement tier.

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 maximise sustainability benefits from 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.

Furthermore, the identification of the sites within the Core Strategy has not been based on a clear, robust and transparent evidence base as discussed in further detail below.

B – Is the Core Strategy consistent with PPS3 particularly in respect of the following:

- (i) **the requirement to address housing delivery for at least 15 years**

The production of the Core Strategy, particularly in respect of strategic housing allocations, is fundamentally flawed as a result of the lack of a transparent and robust evidence in line with the requirements of PPS12. The SHLAA is of key importance for the identification of strategic housing sites for the purposes of the Core Strategy, however, there was no opportunity to comment on the study and the document was not published as part of the Core Strategy consultation.

We question the soundness of the Core Strategy due to the lack of available evidence to support the choices made by the Council. 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. 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/locations 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.

In terms of the timings of the release of housing land it is stated a flexible approach to the timings of the release of land will be maintained 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. The need for this flexibility places further uncertainty on the ability of the Plan to bring forward the necessary housing pre 2015.

- (ii) **bearing in mind that Green Belt releases may be necessary, does the Core Strategy provide the appropriate context and give adequate guidance for a subsequent site allocations DPD readily to identify the land needed without having to re-visit strategic flexibility?**

It is understood that 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 released land do not undermine the principle of the Green Belt. On this basis, the

careful and well considered release of Green Belt land is needed to ensure sufficient land is supplied in order to meet the District's housing requirements.

Paragraph 6.7 of the Submission Core Strategy sets out 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. As a result, reassurance is not currently offered by the draft Core Strategy that sufficient Green Belt land has been identified. In this respect the Core Strategy is not consistent with Guidance set out in PPG2 in that the release of Green Belt land should not be carried out on an ad hoc basis.

This issue is further amplified given the constraints identified by the Council in terms of the need to avoid 'town cramming' it is, therefore, critical the Core Strategy adequately and realistically plans for new residential development in Rochford District.

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. No method for discounting some Green Belt sites and not others can be identified in the Core Strategy or the available evidence for the Plan. On this basis, 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.

(iii) Is there sufficient flexibility?

In line with arguments set out at 'A' above the approach to housing provision, the Core Strategy does not currently offer sufficient flexibility in order to realistically meet the District's housing requirements.

It appears there are two key factors determining the level of housing that will be delivered in the District of Rochford in the plan period. Firstly, the deliverability of the identified employment sites to be released for housing and secondly the restrictions in place as a result of the need to protect Green Belt land in the District. On reflection, these issues represent a clear need to build sufficient flexibility into the Core Strategy to ensure the District's housing requirement can still be met should any of the strategic housing allocation fail to come forward within the identified timescales.

Given the level of uncertainty of deliverability of the strategic housing site and the reliance placed on these sites it would be advantageous to identify additional sites should any of these sites fail to come forward.