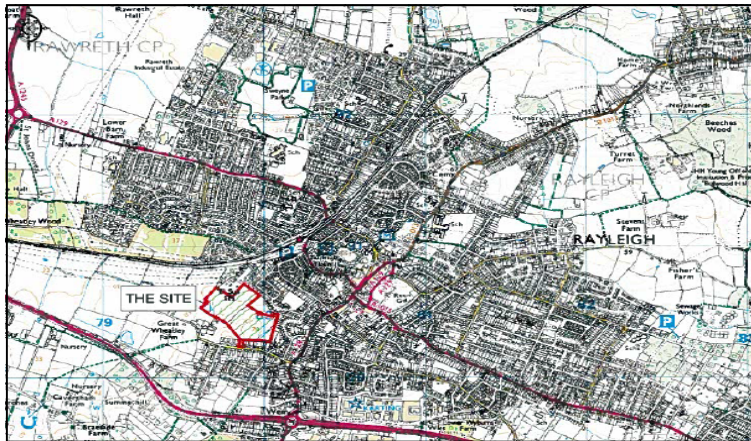


**ROCHFORD LOCAL DEVELOPMENT FRAMEWORK  
CORE STRATEGY EXAMINATION MATTERS AND ISSUES  
APRIL 2010**

**Representation ID: 16871, 16870, 16869, 16868, 16867  
Matters and Issues 1)b), 2)a), b)i) and c)  
Policy H2 and H3**

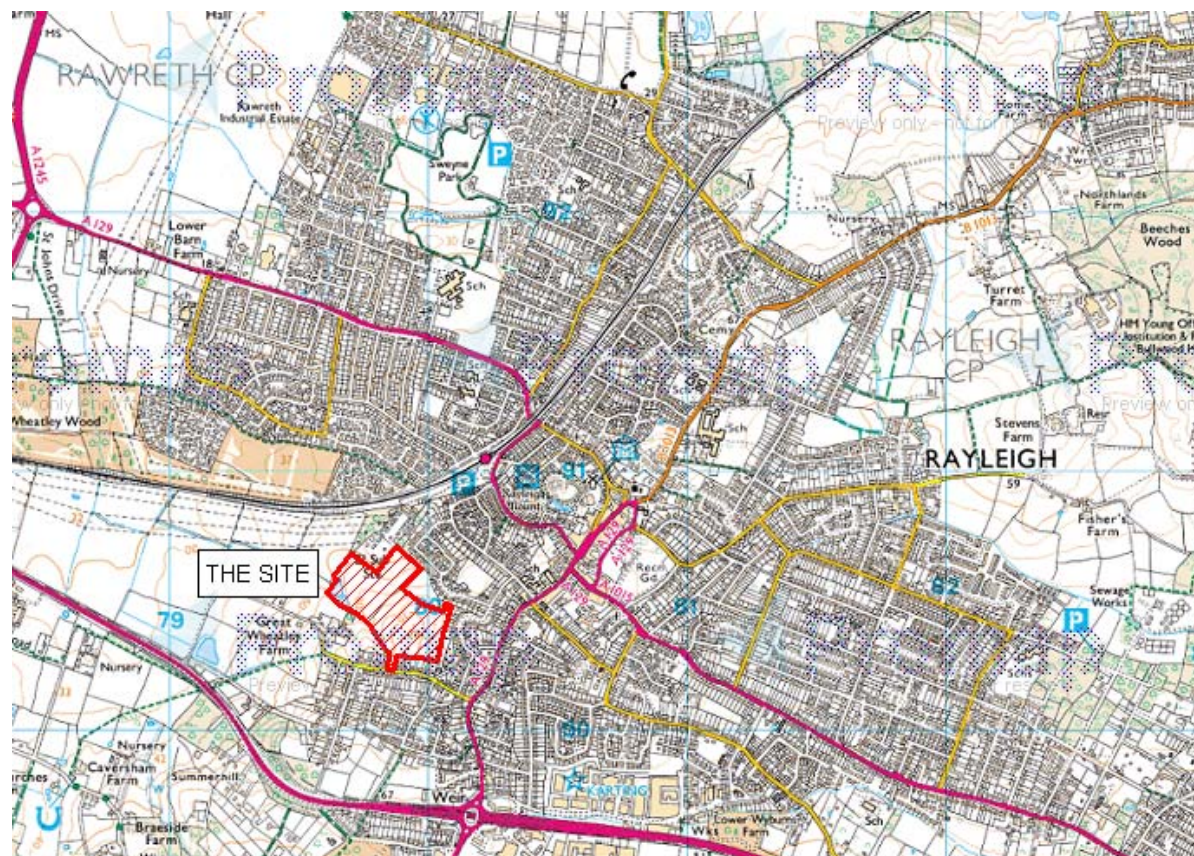
**LAND AT GREAT WHEATLEY, RAYLEIGH  
On behalf of Knight Developments**



**STRUTT  
& PARKER**

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## 1.0 Introduction

- 1.1 This statement is submitted on behalf of Knight Developments who are promoting land at Great Wheatleys. Knight Developments have an interest in an area of land comprising approximately 11 hectares located generally on the south western edge of Rayleigh.
- 1.2 Representations were made of behalf of Knight Developments to the Core Strategy Issues and Options and also the Core Strategy Submission Document in October 2009. This Statement relates to the Matters and Issues as set out on the list of Revised Matters and Issues for the Examination dated 31 March 2010. The relevant Matters and associated Issues will be dealt with in the next section of this statement under the individual headings.

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## 2.0 Comment on the Matters and Issues raised by The Inspector for discussion

2.1 This section deals with the Matters and Issues raised by The Inspector.

### **Matter I: Spatial Vision**

#### **Issue b)**

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

- 2.2 Planning Policy Statement (PPS) 12 advises Local Planning Authorities (LPAs) to adopt a spatial planning approach to Local Development Frameworks (LDFs) to ensure the most efficient use of land by balancing competing demands within the context of sustainable development (paragraph 1.8). It goes on to state in paragraph 4.9 that the evidence base is critical to the preparation of Local Development Documents (LDDs). Local Planning Authorities should ensure that the delivery of housing and other strategic and national requirements is not compromised by unrealistic expectations about the future availability of infrastructure, transportation and resources.
- 2.3 A number of factors are unknown in relation to funding and timescales of the areas identified for residential development and there is a risk that contrary to the requirements of both PPS3 and PPS12 and the Regional Spatial Strategy (RSS) Rochford will lose ground against the required completions year on year. A balance of allocations should provide housing at the right time and in the right places to recognise any limitations on delivery. The Core Strategy does not currently achieve that balance.
- 2.4 Rayleigh is the largest settlement in Rochford and Government guidance in PPS3 sets out as an objective that housing developments

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should be in suitable locations which offer a good range of community facilities and with good access to jobs, key services and infrastructure. The distribution of services and facilities across the District, broadly reflects the distribution of the population and the west of the District contains the majority of the population, has better access to services and fewer physical constraints. More allocations in this area would result in a more sustainable pattern of development.

- 2.5 The Rochford Core Strategy does not make a realistic provision for housing land in accordance with Planning Policy Statement 3 (PPS3). The Strategy does not set a clear vision for the future pattern of development in the first instance, nor contain sufficient flexibility to respond to changing circumstances. It does not allow for realistic alternative options to be properly considered at an early stage, and therefore the Core Strategy is considered to be unsound in relation to Test 4b and Test 9.
- 2.6 The change being sought within the Core Strategy is that the distribution of housing allocations should be amended so that there is an opportunity for more housing to be allocated in a more appropriate spatial distribution. The proposed change would enable the plan to become more sound as there will be less associated risk, and the change will ensure flexibility whilst still ensuring sustainability. A steady release of housing sites across the District should meet the continuous housing targets, resulting in a wider choice of sustainable housing locations in accordance with the requirements of PPS3 and PPS12.

**Matter 2: Location and Supply of New Homes****Issue b)i) and iii) and Issue c)**

*Is the CS consistent with PPS3 particularly in respect of the following: i) the requirement to address housing delivery for at least 15 years from the date of adoption and iii) is there sufficient flexibility and will the CS deliver a continuous supply of housing land? Are the broad locations for the supply of new housing the most appropriate when considered against all reasonable alternatives?*

- 2.7 In the Preferred Options draft of the Core Strategy, Rayleigh previously had two sites including the site which is the subject of this representation. A total of 750 houses were allocated; 550 to be provided by 2015 and 200 houses between 2015 and 2021. In the Submissions draft of the Core Strategy, 200 houses have been removed from the plan for Rayleigh, and the provision of homes prior to 2015 is now at 0.
- 2.8 The Submission Document fails the 7th test of soundness for Policy H2 in terms of not being justified. The removal of housing numbers from Rayleigh, in particular from south west Rayleigh, is not founded on a robust and credible evidence base and it is not the most appropriate strategy when considered against reasonable alternatives of allocating sufficient housing in a Tier I settlement. The delivery of housing is now solely reliant on the 550 houses proposed for allocation on land to the north of London Road. The DPD therefore fails the test of soundness as it is not flexible enough to respond to a variety of, or unexpected changes in, circumstances. The allocation of our client's land allowed for flexibility through out the plan period.
- 2.9 There is considered to be a fundamentally more appropriate alternative to the housing allocation distribution. Our client's land has the ability to contribute at any stage of the trajectory set out within the Submission Document. Rayleigh has a high level of service

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provision and the allocation of housing land to the south west of Rayleigh will enable significant enhancement to these facilities to be made.

- 2.10 The infrastructure required in relation to the site to the south west of Rayleigh is less than other areas, and it is not clear in the sustainability appraisal how the different sites perform against each other and why there is such a difference in Policy H2 following the Preferred Options stage. The Core Strategy is considered to be unsound in relation to the 9th test of soundness in that Policy H2 is not reasonably flexible to enable it to deal with changing circumstances.
- 2.11 The allocation of housing in Rayleigh should not be in one location to the north of London Road. The site to the south west of Rayleigh forming the basis of these representations can make an important contribution and should be included within the housing allocations in the Core Strategy Submission Document.
- 2.12 The Core Strategy does not offer an alternative source of land to guarantee the supply of housing land in the event that the sites do not come forward. The strategy is not based on a sound and comprehensive assessment of locations and an element of choice and flexibility for local people is being lost.
- 2.13 Policy H3 in the Submissions document fails the test of soundness in terms of not being justified. Our client's land forming the basis of this representation is suitable for meeting the housing needs of the area and can be brought forward either prior to 2021 or could be suitable for inclusion post 2021. A flexible approach is required to maintain a 5-year supply of land, and in the event that identified areas

can no longer be delivered for development, alternative sites should be scheduled.

- 2.14 The change required to the DPD to make Policy H2 sound is for the inclusion of the site to the south west of Rayleigh for at least 100 houses for the plan period.
- 2.15 Notwithstanding the objection to the soundness of Policy H2, Policy H3 could be made sound by including the land the subject of this representation as an extension to the residential envelope post 2021.



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### 3.0 Conclusions and Proposed Changes

- 3.1 The Core Strategy does not reflect national guidance on spatial planning and is in contravention with key Planning Policy Statements— notably 3 and 12 , as well as the associated practice notes issued by the Government. Accordingly, the Inspector is asked to make changes to the Spatial Strategy. Accordingly, the Inspector is asked to make changes to the spatial strategy to allow for more housing to be allocated in an appropriate, sustainable and deliverable distribution.
- 3.2 The Submission document fails the test of soundness for Policy H2 in terms of not being justified, The removal of housing numbers from Rayleigh and in particular from south west Rayleigh is not founded on a robust and credible evidence base and is not the most appropriate strategy when considered against reasonable alternatives of allocating sufficient housing in a tier 1 category town which meets the Council’s sustainability criteria. Furthermore, Policy H2 of the Submission DPD is not considered to be sufficiently flexible to deal with any changes to the RSS by being reliant on less sites and again fails the test on flexibility grounds.
- 3.3 The change required to the DPD to make Policy H2 sound is for the inclusion of the site to the south west of Rayleigh for at least 100 houses for the plan period. Notwithstanding the objection to the soundness of Policy H2, Policy H3 could be made sound by the inclusion of the land the subject of this representation as an extension to the residential envelope post 2021.