



ROCHFORD DISTRICT COUNCIL ALLOCATIONS DEVELOPMENT PLAN DOCUMENT
INSPECTORS ISSUES AND QUESTIONS – AUGUST 2013

FAIRVIEW NEW HOMES LTD

ISSUE 1

1.1 On behalf of our client, Fairview New Homes Ltd (Fairview), we have actively participated at all stages of the emerging Rochford Allocations Submission Document (RASD). Whilst we have been supportive of many aspects of the RASD, we continue to object to it, as we are of the firm view that it is not fully Justified nor Effective, when considering the tests of Soundness.

1.2 The Inspector is fully aware of our previous submissions in this respect, and these still remain, and we wish to add to these by responding specifically to the Issues and Question raised by him.

1.3 In summary, our client has an interest in the land off Poyntens Road, and we are of the firm view that this is a suitable site to contribute towards the Districts much needed housing supply. The Council have not provided a robust response as to why it has been excluded, and certainly, when considered against the sites the Council have selected, the Land off Poyntens Road scores significantly better. This contained site, adjacent to existing residential properties would provide / maintain a defensible green belt boundary, is in a sustainable location and well located to the Rayleigh Town Centre, and is not hindered by any technical constraints. It can deliver much needed housing, in the short term.

Issue 1, Question iii) would a 5 year housing land supply be achieved having regard to Paragraph 47 of the National Planning Policy Framework (NPPF)?

1.4 With specific reference to Rayleigh, the Council have only identified a single site to deliver the extension (green belt release) that is needed to provide the significant and much needed housing. There is absolutely no flexibility in this approach. The Council acknowledge that there is risk in this

site, and noting the site specific constraints, could result in the site not being delivered and being able to maintain their five year housing supply.

1.5 Para 47 of the NPPF is clear that the need, as shown in the evidence base must be fully and objectively met. It goes on to require demonstration of a “realistic prospect” of achieving the supply. Simply put, the reliance of a single [large] site, with significant constraint and technical matters that must first be overcome, poses a significant question mark over its delivery, certainly in the early part of the plan period. The pragmatic response would be (and acknowledging that the housing targets needed are minimums) is to allow flexibility in the supply, to not only provide competition and choice, both requirements of the NPPF, but allow for a realistic prospect of achieving the plan objectives.

1.6 It is our view that the RASD is not sound, on the basis it is not Justified and Effective, given the risk shown, and that alternate / additional sites should be identified.

Issue 1, Question iv) Do the proposed Allocations allow for sufficient flexibility?

1.7 As mentioned above, there is no flexibility in the proposed allocations. With respect to Rayleigh, where the majority of new housing is being directed, should the proposed allocation not come forward in the timescales envisaged, there are no alternate options to make up any shortfall. The Council have short-sightedly committed themselves to a single delivery, which could by their own admission not be delivered within the forecast timescales, and thus falling short of their 5 year housing land supply.

1.8 With reference to the Councils most recent AMR (11/12), it is noted that the Council have only in two years (between 2001 and 2012) exceeded the average now needed – and this was in the height of the housing market / boom in 2006 and 2007. The Councils own projections place heavy reliance on the strategic releases, and the reliance on these places little flexibility. With a significant need, and low level of past completions, the Council should be providing alternative sites to ensure that delivery is realistic.

1.9 It is therefore felt that this demonstrates an unrealistic prospect, and not justified, based on an evidence base with ‘reasonable alternatives’ that have been discounted.