



ROCHFORD DISTRICT COUNCIL ALLOCATIONS DEVELOPMENT PLAN DOCUMENT

INSPECTORS ISSUES AND QUESTIONS – AUGUST 2013

FAIRVIEW NEW HOMES LTD

ISSUE 2

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.

1.4 With respect to this specific Issue, our response is focused solely upon the allocations in Rayleigh.

Issue 2, Question i) Is the site selected justified when compared to other reasonable alternatives?

1.5 Through our previous submissions, we have shown that the assessment of the land “North of London Road, Rayleigh” (SER1) has had little regard to the “Land off Poyntens Road”, and how the

two sites score against each other, using the Councils own method of assessment. We believe that this latter site, to which our Client maintains his interest, is indeed a reasonable, suitable and justified alternative. Whilst we do not necessary object to SER1 coming forward, our objection relates to it being the sole allocation coming forward, and as covered by our response to Issue 1, not allowing for flexibility – a requirement of the Plan.

1.6 We note the commentary in the Adopted Core Strategy, at para 4.20, and without repeating these, note the with the exception of the second bullet point (given the size of the site) the Land at Poyntens Road scores better, in all respects, than SER1 does.

1.7 Whilst SER1 may be justified in itself, a requirement of the plan making process is to ensure that it is appropriate based on the assessment of all reasonable alternatives, and we maintain our objection that the omission of the Land at Poyntens Road, as a suitable alternative to allow flexibility and the reasonable prospect of achieving the plan objectives, renders it unsound and not Justified.

Issue 2, Question vi) If any of the specific sites/locations are found to be unsound, then what are the alternative options?

1.8 As demonstrated, a reasonable alternate site is the Land off Poyntens Road.

1.9 With the exception of the matter that the general location of this site does not fall within the identified areas contained within Policy H2 or H3 of the Adopted Core Strategy, the site is consistent with aim and thrust of Guidance contained in the National Planning Policy Framework.

1.10 It is also consistent with the Guidance and Tests of Soundness, and is a justified and reasonable proposition to deliver the objectives of the Plan.

1.11 We have also shown in previous submissions that the site is suitable and available in the short term, a significant concern considering the past levels of delivery, and need to significantly boost housing supply. Whilst an allowance and acceptance of windfall sites is acknowledge, the sole reliance on a single large site, where the Council acknowledge risk, does not respond to the requirements of paragraph 47 of the NPPF, in so far as the Councils approach is not embracing the need for choice and competition (see comments in Issue 1).

1.12 Accordingly, it is our view that the RASD is unsound, given that it has had little regard to suitable alternatives, and thus not justified.