

Response to Inspectors' Issues and Questions

1. Further to the publication of the Inspectors' Issues and Questions, we write on behalf of Cogent Land LLP (Cogent) to address those matters of relevance to the issues of soundness raised by Cogent.

Issue 2 – Questions for all sites / locations

2. The responses and representations to Issue 2 (Questions for all sites / locations) included below focus on the proposed allocations at West Great Wakering. Comments and representations made previously in relation to other sites remain relevant and we reserve the right to address these at the Examination.
3. However, as previously noted Cogent contests the robustness of the Council's forecasts for redelivery of the major housing sites identified (as a result of lead in times, constraints and projected delivery rates) the effect of which is the number of the units completed within the five year period will be less than projected.

Question (i)

4. The site at West Great Wakering identified as SER 9a is justified when compared to other reasonable alternatives. It has the potential to make an important contribution towards meeting the needs of Great Wakering and Rochford District Council as a whole and is deliverable in the short term. In this regard it is noted that the wards of Foulness and Great Wakering are identified as being a primary recipient of in-migration in the District and therefore have particular needs to accommodate growth. In addition, the site is capable of delivering more than the housing numbers identified by the Council, particular through the extension of the allocation to include the wider land parcel to the west of SER9a. This site remains available for development to meet the District's housing. Furthermore, the site is capable of meeting wider employment demand requirements and is considered a suitable alternative to land identified as SER 9b and / or NEL3.

Question (ii)

5. As explained in our previous representations, the site is deliverable and developable in the plan period in accordance with the NPPF. The land is held in option and can therefore be delivered at the earliest possible time, as required to meet the Council's need. We would suggest that the allocation has significant potential to be extended to the south as this will allow for improved access arrangements from the site to the services and facilities provided by Great Wakering, such as schools and shopping etc. An additional benefit of this would be to distribute the access and egress more equitably to the north and south of the site.
6. In addition there is a gas main which runs alongside the allocated site. It is important to note that this does not affect the deliverability of development on this site. The site remains capable of delivering a smaller proportion of the dwellings in the HSE's middle consultation

zone (nearest the pipeline), increasing proportionately into the outer consultation zone and beyond the zoned area. In all it is capable of delivering at least 166 dwellings across the site.

Question (iii)

7. As referred to above, the site boundary should be extended to the south to allow for improved access to be provided. This would have the dual benefit of improving access to the facilities and services offered by Great Wakering as well as distributing flows to and from the site to the north and the south.
8. In addition, the site boundary should be extended to include the land to the west of SER 9a. This land is also a suitable location for housing and employment land and is under the control of Cogent. It is therefore deliverable in the plan period and in our view it is required in order to assist the Council in meeting its 5 year housing land supply.

Issue 2 – Questions for specific sites / locations: Great Wakering

Question (i)

9. The Core Strategy Issues and Options Regulation 25 (dated 2007) previously identified the land to the south of Great Wakering, including the proposed employment site, as a strategic gap. As such its proposed allocation for employment uses is surprising. Whilst this strategic gap was not carried through into the adopted Core Strategy its earlier identification clearly demonstrates the sensitivity of the narrow gap between Great Wakering and Southend. Whilst existing industrial uses may be willing to relocate to the new employment site if the development of new employment facilities is completed before redevelopment of the old site, an alternative location that is outside the previously identified strategic gap is available and deliverable.
10. The land to the west of SER 9a is a suitable alternative location for this employment use, outside the land allocated for housing and beyond the gas pipeline. The site is deliverable in accordance with the requirements of the NPPF.
11. Fuelled by current market demand within the local HMA, Cogent Land LLP has a number of volume house builders that have registered serious interest in the land, providing its allocation can be brought forward in order to enable its development now rather than as the Council propose post 2021.

Question (iii)

12. If site 3 is found unsound then extending site SER9a to the west is considered a better option for the provision of employment uses as explained above. It is deliverable in accordance with the NPPF as it is under the control of Cogent and could be developed in conjunction with the site reference SER9a.