

## **ALLOCATIONS SUBMISSION EXAMINATION HEARING STATEMENT**

### **Introduction**

This Hearing Statement is submitted to the Examination into the Rochford District Allocations Submission by Mr Barrie Stone. In particular this Statement responds directly to Issues 2 raised by the Planning Inspector in advance of the opening of the Hearing Sessions on 3 September 2013. It should be read in conjunction with our previous representations made to the Rochford District Allocations Submissions and earlier Core Strategy Plan and their subsequent modifications.

### **Response to Issues**

#### **Issue 2**

Are the allocated housing and employment sites below (both brownfield and settlement extensions) justified, deliverable within the plan period and consistent with national policy?

It is considered that the sites selected within the Allocations submission are not justified when compared to reasonable alternatives and in addition not consistent with national policy.

The allocated sites within Rayleigh (SER1) and Stambridge Mills (BFR3) are not appropriate having regard to the availability of reasonable alternatives. It does not represent the most appropriate strategy to contribute to the sustainable development of the District and as such is in conflict with the National Planning Policy Framework (NPPF).

Paragraph 152 of the NPPF requires LPA to seek opportunities to achieve sustainable development economically, socially and environmentally and it is considered that existing allocation are not the most suitable sites available within the District to meet this target.

The allocation of land to the west of Rayleigh ignores the large hub of employment generated adjacent to Southend airport. It is considered that allocations within Rayleigh should be located on the eastern side of the town within 3 miles of this expanding employment hub. The Southend Airport area is an area that is projected to have considerable growth in employment. Increased job growth will add pressure to provide additional housing in the east of the district within a sustainable commutable distance to employment zones. The east of Rayleigh is within 3 miles and more justified location for development that the site SER1 being promoted on the west side of Rayleigh.

Land at Stambridge Mills is located within the flood plain and as such is an unsustainable location for residential development. Mitigation in respect of flood risk has not yet been agreed so it is questionable whether this site can be delivered within the timescales.

## ISSUE 2

Representor Name: Barrie Stone  
Representor No.: 29002

### Suitable Alternative Site

Land at Eastwood Nurseries (Call for Sites Allocations Site 146) is a medium sized site which offers a more integrated development site and therefore a more suitable alternative to sites SER1 and BFR3. In the Inspectors report on the Rochford District Replacement Plan in 2006 it was noted by the Inspector that the site "*adjoins two established communities likely to be able to accept further additions of population*" and also that "*the local infrastructure would be sufficient to absorb further development*". The reason for the rejection of this site was that there was no need at that time to release Green Belt land for housing which is not the case within the current plan period. A more rounded, balanced and objective appraisal of alternatives would conclude that land at Eastwood Nurseries should be allocated as indicated by the previous Inspector in 2006.

Additional benefits offered by the site include:

- Rayleigh Station is within 2 miles of this site and there are established bus links from this site to Rayleigh town centre. This is a similar distance from the proposed site allocation SER1.
- Local infrastructure could absorb additional development in this location. It is noted in the Site Allocations assessment that the site "has fair access to services." It is within proximity of leisure facilities and schools and has access to the highway network.
- Development with good design and effective landscaping would enhance this unattractive greenbelt land which is subdivided and provides limited landscape benefit but is highly visible from the A127.
- Cycle connectivity with both Rayleigh station and employment centres along A127 from Rayleigh Weir to the Airport exists and can be enhanced as part of this development. This will reduce reliance on car traffic in this congested area.
- Green connectivity from this site available to Cherry Orchard Country Park and open space at neighbouring Castle Point.

### Conclusion

The Plan should be amended and the land at Eastwood Nurseries (Call for Sites Allocations Site 146) should be allocated for residential development. It is considered that the allocation on this site can be achieved by reducing the housing quantum on SER1 or BFR3.

Barrie Stone  
Lady Spring Wood  
Dunton Road  
Billericay  
CM12 9TZ

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