

Hearing Statement for Swan Housing Association, August 2013

In respect of the Examination of the Rochford Allocations Submissions Document on Wednesday 4th September 2013, this statement responds to the *Issues and Questions – Final Version* document.

Summary of previous written representation, ID 28689

Swan Housing Association objects to the selection of sites in SER6 as we think the Council's decision is unjustified, ineffective and therefore unsound. We believe that Site 17 should be included and that the site to the north-west could be forgone. We think this is a rational suggestion based on the accessibility and availability of Site 17 and the appropriateness of utilising a site which is already part developed and bordered on all sides by built form. Both Swan and our partners the Hanover Land Trust are ready to progress a planning application and deliverable housing development as soon as permissible.

Swan would suggest that a reasonable alternative would be for the preferred SWH1 to include Site 17 but forego the site to the north-west (that currently falls within SER6b). Please see Image 1 on the attached image appendix for reference. Please also see Image 3, which shows that some of the proposed sites fall outside of the parish, ward and county council boundaries of Hullbridge; we would argue that a social infrastructure is already in place for those sites within the boundaries. The proposed alternative of using Site 17 would avoid building too far west towards the flood plain as well as keeping the beneficial aspects of Option SWH1 of being well related to the existing residential area and having good links with the local highway network through existing minor roads to the east such as Malyons Lane.

Therefore as set out in our original submission, we feel Site 17 is a more sustainable, more defensible and less intrusive option.

Issues and Questions – Final Version

Below is our response to the questions relevant to this case, posed by Inspector David Smith, 26th June 2013.

Issue 1

- l ii While Swan cannot comment on the achievability of developing the sites in SER6, Site 17 could be delivered within 5 years to contribute to the 5 year housing land supply required by Rochford District Council. A previous feasibility study for the site showed circa 90 units would be possible, subject to consultation.

- vii) While Site 17's inclusion does not avoid the loss of Green Belt land, we believe it mitigates the impact of the inevitable Green Belt loss when compared to the sites proposed in SER6, as it is a logical continuation of the existing town since it is already partially developed, and surrounded on all sides by development of different kinds: highways on two sides, residential on one side and a golf course on the other.

As the Green Belt is a planning policy for controlling urban growth, having a clear boundary, as offered by Site 17, would help protect Hullbridge from future urban sprawl as it is restricted from further growth by other development, as explained above. Green Belt land, as described by the National Planning Policy Framework (NPPF), has a number of benefits. However, unlike the sites proposed, utilising Site 17 would not result in a loss of agricultural land. The site is not forested, nor considered especially attractive, and as it is privately owned does not offer local people opportunity for outdoor leisure pursuits. As such, development on this site does not represent loss of 'open space' in the same way that other proposed sites do.

Given the above, it is considered the Council's assessment is unsound, and there is a more appropriate alternative available in Site 17.

Issue 2 – Questions for all sites/locations

- i) The sites selected by SER6 are not justified when compared to other reasonable alternatives; an analysis of this particular issue can be found in our previously submitted Representation 28689. To summarise, only four options of site configurations were considered in the Updated Sustainability Appraisal for the Allocation DPD Discussions and Consultation Document (options SWH1-4); there was no justification for these groupings, and some individual plots were only considered as part a wider selection of sites, rather than judged on their own merits and on the potential benefits of including them in a sensible configuration. This meant that a site with clear opportunity such as Site 17 was ruled out by default, as the rest of that option was illogically designed: this is an unsound approach.

Option SWH4, the only option to include Site 17, was ruled out because of concerns over cohesion, and over leaving a gap in the urban extension to the north of Malyons Farm. Site 17 is arguably more cohesive than other proposed sites due to its proximity to village facilities in the south of Hullbridge and its location along the highway and current bus route. Regarding the problem of leaving a gap of exposed fields to the north of the farm, this would be easily resolvable by considering a different arrangement, such as that shown on the attached image. It is therefore asserted that the selection is unsound, being unjustified in its reasoning, and failing to compare all reasonable alternatives.

- ii) The deliverability of the proposed plan is questionable, because regardless of the status of ownership of the proposed sites, it is inevitable that the infrastructure of highways, drainage and sewerage will be affected, and to best achieve a sustainable development it would be advantageous to include Site 17 because of its key location.

Site 17 is deliverable. Swan Housing Association is in partnership with the Hanover Land Trust, who is in single ownership of the land, and we are able to begin the design process immediately, starting with a review of the draft scheme for the site that was created in 2008 by Swan, the Hanover Land Trust and Bree Day Partnership, with respect to the then upcoming Local Development Framework. Development could begin as soon as the Local Planning Authority would permit, helping to achieve the Council's target for new homes.

- iii) Any development on the proposed SER6 sites will need to be carefully designed to avoid a weak boundary between Hullbridge and the Green Belt, with the defensibility of the Green Belt a key issue. Site 17 has the appropriate boundaries (highways, golf course, urban form) hoped for to allow for an unobtrusive extension of the urban area.
- iv) If SER6 or any of the specific sites within it are found to be unsound, a reasonable alternative option is to utilise Site 17, for the reasons of suitability set out in this statement, the Hanover Land Trust's statement of 1st August 2013, and representations 28689 and 29006.

Issue 2 – Questions specific to Hullbridge

- iii) It will be necessary to carry out works to highway, drainage and sewage infrastructure along Watery Lane, as this area is already prone to flooding. Upgrading of these facilities would be made easier if Site 17 were included, since this lies on the main surface water drainage route in the area, and encompasses an existing drainage system that could easily be upgraded to suit the Plan's needs.
- iv) Swan believes that the proposed sites of SER6 would not be as well integrated with Hullbridge if Site 17 is omitted. As it stands, a whole new neighbourhood will be created to one side of the village, building on open space without making use of the 'infill' Site 17, which is conveniently located for the local supermarket at the bottom of Ferry Road.
- v) As this statement and its corresponding representation asserts, Site 17 would be a sound alternative location should SER6 be found to be unsound.

Issue 5

Because of the issues above, the Plan clearly does not have effective mechanisms for implementation as the supporting Allocations policy is unsound and unjustifiable in respect of fulfilling local and national policy.

Image Appendix

Image 1: Swan Housing Association's proposed selection of sites:



Image 2: Site 17 location diagram showing access, existing residential buildings, white land and area of previous planning consent for residential development:

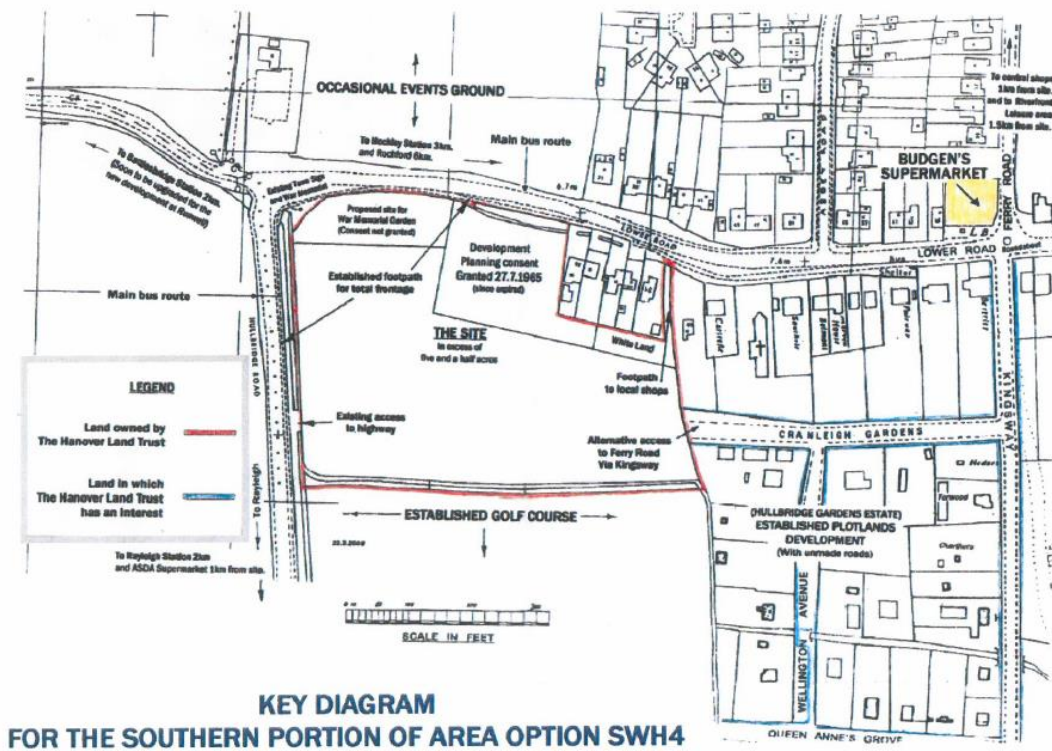


Image 3: Map taken from <http://maps.rochford.gov.uk/myneighbourhood.aspx> showing the Parish (red), Ward (green) and County Council (yellow) boundaries in the area. As can be seen, some of the proposed sites fall outside these jurisdictions, whereas Site 17 is within all three:

