

Mr Shaun Scrutton
Head of Planning and Transportation
Rochford District Council
Council Offices
South Street
Rochford
Essex
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25 January 2013

DC/08/256
BY POST/EMAIL

Dear Mr Scrutton,

ROCHFORD DISTRICT COUNCIL ALLOCATIONS DPD PRE-SUBMISSION DOCUMENT

We write on behalf of Cogent Land LLP (Cogent) in response to the consultation on the Rochford District Council Pre-submission Allocations DPD (Allocations DPD).

a) Policy SER9 – West Great Wakering

Cogent supports the proposed allocation of land to the west of Little Wakering Road, identified as SER9a within the Allocations DPD for residential use. The site has the potential to make an important contribution towards meeting the growth and sustainable development needs of Great Wakering and Rochford District as a whole in the short term. In this regard we note that the Foulness and Great Wakering Ward has been identified as being a primary recipient of in-migration to the Borough.

We note that SER9a is currently identified as a potential allocation in conjunction with land identified as SER9b, to the south of the High Street. In accordance with the previous representations submitted on behalf of Cogent regarding the Allocations DPD, we can confirm the continued availability of the wider land parcel to the west of SER9a. The wider site is considered to be a suitable alternative location for housing and employment land should the need be identified and alternative locations (i.e. to SER9b and/or NEL3) be determined to be either unacceptable to the local community or less sustainable.

A plan showing the boundaries of SER9a and the wider land parcel is provided as Appendix One for reference. The plan seeks to illustrate the potential benefits of extending the proposed allocation to, as a minimum, improve access arrangements to the site from the south in accordance with the supporting text of the policy. It also confirms the extent of land under the control of Cogent should a suitable alternative location for housing or employment provision be required.

We can confirm that, should the circumstances arise where development of the site would be supported prior to 2021, then the site can be defined as both deliverable and developable in accordance with the National Planning Policy Framework (NPPF).

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b) Housing Land Supply

Cogent has undertaken a review of the Rochford housing land supply. It is concerned that the Council may not be able to identify a five year supply of deliverable housing sites that accords with the NPPF and recent appeal decisions.

Furthermore, Cogent is concerned that the housing provision targets contained within the Core Strategy, and by extension within the housing land supply numbers, do not meet the requirement of the NPPF to meet the *'full objectively assessed needs for market and affordable housing'* (paragraph 47).

Such concerns with housing land supply are magnified where delivery from identified sites is constrained and levels of in-migration are comparatively high. The SADPD includes a number of examples of where housing land supply is likely to be constrained, but we draw particular attention to the identified constraints at BFR3, SER2 and SER9b.

c) Population Demographics

Recent figures released by the Office for National Statistics published in respect of the 2011 Census have confirmed an increase in the population of the UK as a whole, with a particular emphasis on London, the South East and East of England.

The findings of the Essex Planning Officers Association (EPOA) within their assessment of the Greater Essex Demographic Forecasts in March 2012 provide further evidence of the anticipated population growth within Essex. They confirm that the sub-national population projections (SNPP), Migration-led and Economic scenarios identified the need for significantly higher annual housing provision figures than those which the adopted Rochford District Council Core Strategy currently allows for.

It is on this basis that we are currently preparing an objective assessment of housing needs for Rochford and surrounding local planning authority areas with a view to addressing the housing needs of the contiguous market area in the period to 2031. We would be pleased to discuss the results of the assessment with the Council as soon as practicable.

d) Land south of Stambridge Road, Rochford

Cogent maintains control freehold ownership of land to the south of Stambridge Road, also referred to on occasions as Coombes Farm, which it considers to be both suitable and available for residential development. It is considered to occupy a sustainable location in close proximity to Rochford Town Centre within which a wide range of public services, community facilities and public transport networks can be accessed with ease.

It is significant that the land under the control of Cogent falls outside of an area considered to be at risk of flooding and also excludes land indicated as the future potential extent of the Southend Airport Public Safety Zone.

e) Alternative Sites in West Great Wakering

Cogent is concerned that the other proposed allocations in West Great Wakering – SER9b and NEL3 – are likely to be constrained by wildlife and other ecological matters related to the Star Lane Local Wildlife Site, would contribute to the potential coalescence of between Great Wakering and Shoeburyness and would encourage development in a locally sensitive landscape.

f) Moated Barn, Stambridge Road, Rochford

Cogent also owns the freehold of a small site to the south of Stambridge Road. It is bounded by existing residential development to the north, east and west as identified on the Rochford District Council Replacement Local Plan (2006) Proposals Map A and is part of a contiguous frontage of development along Stambridge Road.

The site is previously developed land; it comprises a cluster of existing farm buildings which are currently used for the storage of machinery and other industrial plant. The buildings on site are in a relatively poor state of repair, but the site benefits from ancillary external parking, servicing and loading areas.

The site benefits from its sustainable location, in close proximity to Rochford Town Centre, within which a wide range of public services, community facilities and public transport networks can be accessed. In view of its sustainable location, the site is considered suitable for alternative planning uses, including residential and/or local health uses. Cogent can confirm that it is currently engaged in discussions with a Rochford medical practice and Primary Care Trust regarding the provision of a health centre at the site. As such, the site offers the potential to provide a positive contribution to the local community and an improvement to the setting of the urban environment.

A plan showing the boundaries of the site is provided as Appendix Two for reference.

g) Land to the West of Purdey's Industrial Estate

Cogent has long-term control of land immediately adjacent to the West of Purdey's Industrial Estate, Rochford, also referred to on occasions as Three Ashes Farm.

Purdey's Industrial Estate is currently the largest employment site in the district as confirmed by the 2008 Employment Land Study which identifies it as *'fit for purpose... should be maintained and, if possible, expanded'*.

The Cogent landholding to the west of Purdey's Industrial Estate is ideally located to support development and establishment of a strategic employment location which is establishing at Southend Airport. An allocation, through the Allocations DPD, would contribute to the sustainable expansion and enhancement of the most successful employment location within the District by virtue of its location and ability to accommodate uses which whilst vital to the success of growth of operations at the airport would not be able to afford to be located airside.

Purdey's location and accessibility contrasts with proposed allocations of land to the west of Rayleigh and north of the Annwood Lodge Business Park, which are considered to be unsuitable for distribution uses and not deliverable respectively.

The land is well contained by existing development and its allocation for the provision of infrastructure improvements with complementary employment uses provide an opportunity to enhance the transport network in the immediate area.

The development of land to the west of Purdey's Industrial Estate presents an opportunity to facilitate improvements to relieve well-known bottlenecks which cause congestion at the 'Anne Boleyn' junction which will also enhance the amenity of local residents. Furthermore, its identification within the Allocations DPD would not be precluded by the policies of the Core Strategy.

A site location plan showing the boundaries of the site is provided as Appendix Three for reference.

h) Other matters

In addition to the above, we have a number of observations regarding the following policies:

i. Policy BFR1- Star Lane Industrial Estate

The re-use of vacant brownfield land (formed by the southern section of Star Lane Industrial Estate) is welcome in principle.

A planning application (reference: 12/00252/FUL) which proposes 140 dwellings on the southern section of Star Lane Brickworks is currently pending determination. Cogent has submitted representations to the application, which supported the proposals in principle, whilst identifying a number of matters for consideration. We trust that these matters, which included the including the consideration of the effects of the proposals on the adjacent Local Wildlife Site (LWS); the desirability of improving public access to the LWS as part of the need to enhance publicly accessible greenspace provision within Great Wakering; and the cumulative effects of development proposals on existing infrastructure and facilities will be given due regard in the plan making process.

ii. Policy BFR3- Stambridge Mills, Rochford

The identification of a requirement to provide children's play facilities, in the form of either a Local Area of Play (LAP) or Local Equipped Area of Play (LEAP), in association with any proposed residential development is considered to add weight to the concerns expressed by Cogent regarding the deliverability of the Stambridge Mills site. The provision of children's play facilities alongside the identified constraints (including but not limited to highways/access infrastructure, flood mitigation measures and affordable housing), means that the overall quantum of dwellings that may be deliverable on site is likely to fall considerably below that originally anticipated in the adopted Core Strategy. These factors cast doubt over the deliverability of the proposed scheme, both in terms of the number of dwellings capable of being accommodated at the site and in terms of the timing of their provision, and re-affirm the need to ensure that the development of Stambridge Mills is comprehensively planned in accordance with the proposed development of land South of Stambridge Road.

iii. Policy SER2- West Rochford

We note the fact that the Council clearly anticipates a greater provision of housing at West Rochford by defining the delivery of 600 houses as a minimum. Cogent is concerned that this is contrary to the principles established in the Core Strategy, its evidence base and the NPPF.

Equally, the concerns expressed previously regarding the ambitious housing delivery projections from the site which, on the latest available projections, still anticipate delivery of between 100 and 200 units per annum from 2013/14 to 2017/18. The projected delivery is ambitious both from the perspective of the anticipated delivery start date and in terms of the projected annual provision.

The resolution to grant planning permission, subject to the completion of a Section 106 agreement, was made on 18 January 2012. It is clear that the completion of the Section 106 agreement has taken over a year to date and there is no apparent prospect of its completion in the near future. It is also significant that the application was submitted by a single housebuilder. Recent evidence of housebuilding rates indicates delivery of between 0.5 and 0.6 units per week (25-30 units per annum) by a single housebuilder. As such, it is unrealistic to programme housing delivery to commence until much later in the five year period and the levels anticipated are also unrealistic.

iv. Procedural Matters

Finally, Cogent is concerned to ensure its representations to the previous iterations of the Allocations DPD and its associated Sustainability Appraisal Consultation have been taken into account in the preparation of the current consultation.

i) Conclusions

Cogent supports the identification of proposed allocation of land to the west of Little Wakering Road for residential use. However, it maintains a number of concerns regarding the ability of the Council to demonstrate an NPPF compliant housing land supply.

Cogent has also sought to identify other potential development sites that are capable of making a positive contribution to housing land supply, healthcare provision, infrastructure and employment.

We respectfully request that the Council notifies Iceni, on behalf of Cogent, of the future arrangements for the Examination of the Allocations DPD. Furthermore, Cogent wishes to take this opportunity to formally register a request to appear at all relevant stages of the Examination. Please confirm this request by way of return to this letter.

We trust that the Council will find these representations to be constructive and helpful in taking forward the Allocations DPD. Should you wish to discuss any aspect of these representations further, please do not hesitate to contact us.

Yours sincerely

David Churchill
DIRECTOR