



**Councillor John Mason**

**Representing the Hawkwell West Ward**

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**Member Correspondence**

Date: 13 August 2010

Miss Laura Graham BSc MA MRTPI  
Planning Inspector  
C/O The Programme Office  
Rochford District Council

Dear Miss Graham

I am making a representation to you on behalf of residents in response to your request of the Council for a Topic Paper on Affordable Housing where the closing date for comments under this Topic you have set to 17 August.

I was hoping that I could have seen the Topic Paper and I have delayed writing to you in the expectation that it would have been published because the Portfolio Holder made reference to this at Full Council as long ago as 27 July.

But it has not and I regret that because I believe that since the Council issued its Statement to you on 19 July that this Topic Paper has become pivotal in the examination of the Core Strategy.

Indeed I believe that since the Statement that this Topic Paper and the Statement itself should be subject to a further district wide public consultation of a minimum of six weeks. I do not, however, believe that the Council's position is sufficiently prepared right now for such a consultation to be accompanied with sufficient evidence for a consultee to form a considered view on Soundness. Under such circumstances it would have to be found Unsound and the CS returned to the Council for major revision.

The Statement adopts the RSS31 targets without significant or material evidence or justification in relation to the housing needs of the district. It refers to the SHMA 2008 and 2010 studies but there is no data analysis linkage to the RSS31 quantum position the Council has adopted in the Statement.

At Full Council on 27 July, and prior to the debate by emails to residents, the Portfolio Holder claims that the SHMA studies represent a local housing needs study which is represented in the new quantum put forward in the Statement. Councillor Hoy and I have challenged this in Council by way of a Motion but were defeated by the majority administration.

Materially the SHMA 2010 recommends that the local housing needs represent 196 affordable dwellings per year but this is rejected in the Statement and replaced with the inferred 60 per year from the total annual building target per year from RSS31.

I do not believe that 196 is correct but I do not believe that 60 is either and the approach is Unsound because there is no justification for the latter in the absence of further local study evidence.

The other issue, and which I have raised with you in my paper on Hawkwell South, is that instead of just affordable housing the district really needs a development policy to also target the growth in homes for certainly single older people and even older couples. Both affordable homes and the latter need to be in or near town centre Locations rather than Locations like Hawkwell South which is not sustainable for these purposes.

A whole district annual supply of affordable housing numbering 60 in South Hawkwell is inappropriate.

Since the revocation of the RSS Targets the Council now has in adopting its Statement the responsibility and accountability to justify the quanta and locations in much greater detail than under the RSS Targets. It must also re-consult and in my opinion replace the present version of the CS with significant revisions.

I have already written to you and stated that I cannot find a trail to the actual evidence that the Council has undertaken a comprehensive and detailed (in planning terms) comparative assessment of the impact of the CS Locations, in that they are identified for places of housing growth, in terms of the impact on green belt, the effect on the landscape and highways. This is even more important now in the changed position of the Statement because the Council also has to justify that there any exceptional circumstances under PPG2 to justify altering Green Belt boundaries in relation to housing and employment provision.

If the Topic Paper on Affordable Housing becomes available then I reserve the right, please, to make an additional representation to you by 17 August.

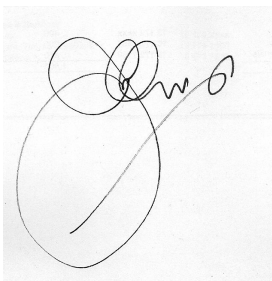
Personally, given the pivotal position of the Topic Paper, I would like to formally ask you to order the Council to undertake a full public consultation on the Topic Paper and the Statement.

If you cannot do this then I would respectfully ask you to issue an interim statement under the PE that the Core Strategy is Unsound.

If none of this is possible then the date of 17 August and the Hearing dates of 7 and 8 September are oppressive to the interests of participants given the fact that the Topic Paper in its new pivotal position has not been published.

Many residents are concerned that the recent actions of Government and their implications to future housing policy are not being properly enacted by the Council in the context of the Public Examination of the CS.

Sincerely

A handwritten signature in black ink, appearing to be 'D. W. O.', written over a large, faint, circular scribble or stamp.

**Councillor John Mason BSc FLS ACIB**