



**ROCHFORD DISTRICT COUNCIL**

**CORE STRATEGY EXAMINATION**

**PLANNING POTENTIAL ON BEHALF OF FAIRVIEW NEW HOMES**

***MATTER 3a – AFFORDABLE HOUSING***

**Representation Reference Number – 16614**

**Affordable Housing – Policy H4**

**17<sup>th</sup> August 2010**

## **MATTER 3a – AFFORDABLE HOUSING**

### **PLANNING POTENTIAL ON BEHALF OF FAIRVIEW NEW HOMES**

Fairview New Homes have an interest in a parcel of land to the South West of Rayleigh Town Centre. This location has been identified in the earlier stages of the production of the Core Strategy as a suitable location in which to provide an urban extension to the south west of Rayleigh to accommodate growth.

To summarise our comments, Fairview New Homes strongly object to the Core Strategy as is currently presented on the basis that the document is unsound for a number of reasons:

- The lack of robust and credible evidence base
- Failure to clearly discount reasonable alternatives
- The effectiveness of the plan is also considered to be flawed and the Council's approach to deliverability and flexibility is questioned.

Each of the issues identified for discussion at the Examination are intrinsically linked and, therefore, our comments set out below should be read in conjunction with all previous submissions and representations made to date.

Enclosed is a copy of our recent comments, on behalf of Fairview New Homes, relating to the Three Dragons Affordable Housing Viability Assessment (Draft), consulted on in July 2010.

**3a – Is Policy H4 consistent with the requirements of PPS3, notably the requirement at paragraph 29 to reflect assessment of the likely economic viability of land for housing within the area?**

The 'acute' need for additional affordable housing is recognised at paragraph 4.30 of the draft Core Strategy. It is unclear from the draft Core Strategy document exactly how much affordable housing is required (overall) in the District over the plan period, nevertheless, taking the starting point as set out in Paragraph 4.30 that the Thames Gateway South Essex Housing Market Assessment, 131 net additional affordable dwellings are needed per year, which constitutes 52% of the District's overall annual housing target.

In order to achieve this target using the Council's proposed policy requirement (Policy H4) that new housing developments are to provide a minimum of 35% affordable housing, representing an annual requirement of 375 new dwellings needed to achieve this (this calculation does not account for those developments with fewer than 15 dwellings which have no requirement to provide affordable housing or developments which cannot viably afford to provide non-market housing).

An annual requirement of 250 dwellings is identified at Paragraph 4.2 of the Core Strategy which would leave a significant short fall of affordable housing and act to compound the current situation. It is therefore, considered in order to meet the District's affordable housing requirement additional housing land should be identified in order to ensure a wholesale increase in housing provision to address the Council's shortfall in affordable housing and meet the targets set for the plan period.

In addition to the above, the Council has recently advised the Inspector that in relation to other matters (the revocation of the RSS) that they wish to

retain the existing housing numbers, but 'stretch' this out to 2031, effectively reducing the annual requirement to 190 units, rather than rolling on the 250 per annum requirement.

As stated above, the Council acknowledge in their Housing Strategy (2008 – 2011) that there is an annual need of 131 affordable units, and that the Council accepts that 'need' is greater than 'supply'. More recently, the Council stated that in fact this requirement has now increased to 196 units per year, and that in the longer term, the Council is only expecting to deliver around 57 – 67 units per year.

With the basis of accepting and undersupply in the region of 70%, the District Council are placing significant pressure on 'housing sites' to deliver significantly in excess of the minimum requirements, bringing in the question of viability.

Without repeating the comments in the attached which focus in much more detail on the intricacies behind the viability assessment, the District has an established overall housing need, an established affordable housing need, and the Core Strategy Policy will not seek to address this, placing significant burden on a 'few' larger developments.

In short, my client is of the view that for the comments made above, and those in the attached, Policy H4 IS NOT consistent with the requirements of PPS3.

Enclosure: Letter to Jody Owens-Hughes, dated 15<sup>th</sup> July 2010