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Date: June 28, 2010

Inspector Laura Graham
c/o Programme Officer
Rochford District Council
South Street
Rochford
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SS4 1BW

By email to Programme Officer

Dear Inspector,

**CONSULTATION ON ADDITIONAL DOCUMENTATION REQUESTED BY THE
INSPECTOR
ROCHFORD CORE STRATEGY GENERAL HOUSING LOCATIONS – AUDIT TRAIL**

On behalf of our clients, Stolkin and Clements (Southend) LLP, who own the Tithe Park site, and whom we represented at the recent Core Strategy Examination hearings, we would like to make the following comments on the Core Strategy General Housing Locations – Audit Trail.

A key part of our case is that Rochford have provided no evidence to the effect that they have considered the possible option of providing a sustainable urban extension to Southend. In our view, the Core Strategy is therefore unsound because it has not been properly justified. The Audit trail reveals that this option was never considered. Therefore our opinion remains that the Core Strategy is unsound.

Page 9 of the Audit details that specific criteria were applied in order to establish the numbers of new houses set out at page 7.34 of the preferred options document. The Council's first consideration was the overall population level of the District's settlements but they have failed to think strategically. Our clients proposals will have significant, strategic benefits in terms of safeguarding more sensitive areas of green belt, and an extension to Southend was not considered. Therefore when assessing the second criterion, which dealt with the environmental capacity of the existing settlements in the district and their connectivity in terms of road networks and sustainability, an extension to Southend was not considered. It is our opinion that our client's proposal would have scored highly had this been the case.

The importance of Southend is noted several times throughout the Audit. For example, it is noted that Essex County Council highlighted the importance of considering the functional

economic relationships with Southend, Basildon and other parts of the Essex Thames Gateway and what the practical implications might be for job/home alignment, commuting patterns, transport and patterns of development provision (page 11). On pages 20 and 21 the implications for housing distribution arising from the Employment Land Study are set out. The Employment Land Study recognises the strategic and strong links with Southend. Consequently a number of locations are considered to relate well to Southend whilst avoiding the generation of traffic on local road networks. An urban extension to Southend was not considered as one of these options, even though it can provide a sustainable option and avoid generating traffic on local road networks.

The Audit details that a 'Call for Sites' took place and members visited sites which were suitable and were capable of providing over 50 dwellings. However, there is no information provided on the conclusions of these site visits and why particular sites/ locations were dismissed (p.37).

The SHLAA provided no detail as to why particular sites were dismissed, they are excluded from the final evidence base document. It is also not recognised in the Audit that the SHLAA was published after the public consultation on the Core Strategy had taken place; and the Audit does not consider at what stage the SHLAA fed in to the process. It was clearly at a late stage noting that the Core Strategy identifies suitable locations on the basis that they are situated in the proposed strategic locations set out in the Core Strategy. This undermines the way in which the Core Strategy has evolved.

The Strategic Environment Assessment (SEA) is recognised in the Core Strategy as a key basis for determining the location of housing. However, the process fails to identify that some sites, such as that of our clients, will also link well to the green grid, and that the whole of the south east of the Borough is not grade 1 agricultural land, but of mixed quality. These considerations have not been fully examined by Rochford because the option of providing a sustainable urban extension to Southend has not been considered at all.

In conclusion our view remains that the Core Strategy is unsound because the suggested locations for new residential development have not been properly justified.

I trust that these representations will be taken into account in your consideration of the soundness of the Core Strategy.

Yours faithfully



MIKE WOOLNER
Director

Enc.