

25 June, 2010

Ref: RMS/JHA/RAY/10003

L Higby – Programme Officer  
Rochford Core Strategy  
Rochford District Council  
South Street  
Rochford  
Essex SS4 1BW

**Email**

Dear Ms Higby

**Rochford Core Strategy Public Examination  
Further Response on behalf of  
The Aston Unit Trust and Mr John Needs (No. 8324)**

Thank you for the opportunity to submit additional representations in respect of the further information sought from the Council by the Inspector. These representations are submitted on behalf of the Aston Unit Trust and Mr John Needs (No 8324) and primarily relate to the 'Housing Location Audit Trail'.

At the public examination a number of respondents pointed out that there appeared to be a disconnect between the sustainable objectives of the Core Strategy and the submitted document. In particular, there was an absence of evidence to explain why the proposal at Issues and Options and the first Preferred Options stage to locate 90% of all housing in the three Tier 1 settlements had been deleted by the time the submitted document was published. This can most clearly be seen in the context of the town of Rayleigh where the level of new housing allocations was reduced from 1800 dwellings to 500. It was because of this evidence gap that the 'Audit Trail' was requested.

Having reviewed the 'Audit Trail', the absence of an evidence base becomes all the more apparent. Both the Issues and Options document and the first Preferred Options document (and their accompanying ESs) concluded that a strategy which located 90% of the new housing in the three Tier 1 settlements and 1800 dwellings at Rayleigh was both deliverable and sustainable. Indeed, the SA of the Issues and Options document clearly states that this concentration option "had the greatest concentration of positive effects" (page 6).

It is unclear from the 'Audit Trail' why Members decided to prepare a second version of the Preferred Options since the GoEast concerns could have been picked up at submission stage. However, page 13 notes that whilst Members were mindful of the SA conclusions that a concentration strategy was the most sustainable option and this had been generally supported by the consultation process, "a slight change in the balance was considered appropriate". The only justification for the change from 1800 dwellings to 500 in Rayleigh was a 'better fit' with school capacity and a concern about facilities being sustained at lower tier settlements. However, the ECC response shows that the children from 1800 dwellings could have been accommodated with additions to the education infrastructure and the concern about facilities in the lower tier settlements had not been seen as a key issue in the earlier SAs.

The result of this was that Rayleigh (acknowledged as being the largest and most sustainable settlement in the district) had its housing allocation reduced to 28% of what had been originally proposed. This level of new allocation is similar to that now proposed for the Tier 2 settlement of Hullbridge which is acknowledged by the plan as having poor public transport and inferior sustainability credentials.

This was a major and unjustified change in the strategy and not the 'slight change' referred to in the 'Audit Trail'. It leads to a settlement strategy which conflicts with the sustainable objectives of the plan.

Since the 'Audit Trail' fails to provide a sound evidence base for the settlement strategy in the submitted Core Strategy, the document remains unsound.

Yours sincerely,

**R Sellwood**  
Sellwood Planning

cc. J Needs

Aston Unit Trust