



Programme Officer
Lissa Higsby
Council Offices
South Street
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Our Ref: K LW/07/145

Date: 25th June 2010

Dear Ms Higsby

REF: ROCHFORD CORE STRATEGY EXAMINATION - INSPECTOR'S LETTER DATED 14TH JUNE 2010 AND THE IMPLICATIONS OF ERIC PICKLES LETTER

We represent Barratt Eastern Counties who have submitted representations referenced 16915 to 16928 and who have a land interest in the area termed south Hawkwell, an application and appeal relating to this area having been heard between September 2009 and April 2010.

We write to submit additional representations in the light of:

1. The Government's intention to abolish RSS and what the implications might be for the Core Strategy.
2. The exclusion of private residential gardens from PPS3 definition of previously developed land
3. The removal of the indicative minimum dwelling density of 30 dph from PPS3.

I shall deal with each in turn.

The Government's intention to abolish RSS

As indicated in your invitation to submit further representations, until RSS is revoked the East of England Plan remains part of the development plan for the area and is in itself a highly relevant and material consideration. In addition, it is rather unfortunate that the revised PPS3, which was issued after the letter from Eric Pickles MP and presumably is a more up to date statement of Government housing policy, retains reference to RSS (paragraph 21, 34,

35, 37, and 45 as it advises on density). This does not help matters because PPS3 as reissued is Government policy and again is highly relevant and material.

Despite these procedural concerns, the key issue is if RSS is revoked, or those areas relating to housing land supply are revoked, is the implication for the Core Strategy and housing requirements in particular.

a) If RSS were revoked this would not, in our view, be grounds to withdraw the Core Strategy and re-start the process. PPS12 and PPS3 remain in force and these set the baseline upon which Core Strategies should be prepared – the Government is not advocating the abolition of Core Strategies. In particular, PPS3 continues to identify the need to identify a 5 year housing land supply and in terms of development plans a housing supply for 15 years from the date of adoption. This has not changed. In the Conservative Party publication 'open source planning' they endorse the 5 year supply as being a good base line from which to work.

b) As a consequence of the above, the key issue would be 'what should the local housing land supply requirement be over the next 15 or so years?' In view of the localism agenda and the decision to return decision making powers on housing to local Council's, the view of Rochford DC is especially relevant to this question. If Rochford DC confirm that they accept RSS housing land supply figures because they recognise that they need to provide affordable and market housing in their area is so pressing, and they reflect a fair need based on robust projections, then the Examination need not be re-opened and the representations made to date should be sufficient for an assessment of soundness to take place. If Rochford DC do not support the RSS housing requirements then they will need to present their alternative and presumably more 'localised' assessment of housing land supply, the basis on which it is founded and how this would alter the Core Strategy. There will potentially be a need to re-open the Examination in order to discuss these issues and provide all stakeholders, not just representors, with the opportunity to comment.

c) It is our view, that should Rochford DC wish to set aside RSS housing requirements then they will need to explain what housing land supply figures they consider to be relevant for their District, why and how they are seeking to implement them in the context of the decisions already made. It is our view that the existing evidence base should provide an indication of housing need by reference to housing needs surveys, and strategic housing market assessments. In addition, the Regional Plan Review 2008 employed Cambridge Econometrics to provide population, household and labour supply projections using the Chelmer Model. It used ONS and CLG data and introduced migration patterns. In the RSS Review, the Chelmer model assessed the 4 development scenarios identified by the Regional Assembly. However, this need not be the case and if Rochford were to set aside RSS then in our view it would be possible to re-examine the population growth projections in the Chelmer model to identify a locally acceptable quantum of housing.

d) Taking this one step further we have looked at the Chelmer runs for the East of England Plan Review. Based on ONS data at Table 1a of the document, it is clear that Rochford is expected to achieve a population increase between 2001 and 2021 of 11,100 people, which at 2.4 people per household equates to a need for 4,625 dwellings in the period 2001 to 2021. This is not dissimilar to Rochford DC own Strategic Environmental baseline Information Profile 2005-2006 and the dwelling numbers sought by EEP 2008. Table 2a of the Chelmer model document identifies the CLG household projections for Rochford between 2001 and 2021 as being 7,000 extra households. Table 3a is the Chelmer standard run for ONS based population increase data and this refines the extra population to 10,100 between 2001 and 2021. The Chelmer model run at Table 4a identifies household formation as being 7,200 new households for Rochford. Depending on the approach of Rochford DC to its local housing need, it is important that we are afforded the opportunity to consider the methodology they adopt and discuss this in the Examination. That said, the published data would indicate that the current EEP requirements remain robust notwithstanding the Government's intentions.

The Exclusion of private residential gardens from the definition of previously developed land.

The removal of private residential gardens from the definition of previously developed land ('pdl') results in a number of issues for the Core Strategy. The Government's intention is to provide more scope for local authorities to resist the loss of garden land through re-development. However, since publication of the previous PPS3 in 2006 development of gardens has been subject to considerations of impact on character, affect on amenity, loss of important habitat, suitability of access etc. The change to the definition may not actually mean very much in practical terms since it does not place an embargo on the development of private residential gardens. However, what it does highlight is a need to consider very carefully whether permission should be granted on private residential gardens. This change in emphasis may result in a need to reassess the evidence base that Rochford has prepared. From the quote above it is clear that the SHLAA is based on a density calculation of sites and not an assessment of impact on character and amenity.

"one of the Council's objectives is to prioritise the redevelopment of appropriate brownfield sites for housing, and thus minimise the release of Green Belt land for development. The SHLAA has taken this into account when looking at the appropriateness of a site and estimating the appropriate density for housing." (Page 4 of the SHLAA)

This may require the schedule C sites of the SHLAA to be re-assessed so that they are robust in the face of new PPS3 advice. Page 39, site reference 8 is a good example. This is a garden site that has been defined as pdl. If Rochford DC carry out a character assessment they may find that 40 dwellings per hectare is inappropriate. It may be that following this re-assessment, it is necessary to delete some of the identified private residential gardens from the

schedule C sites of the SHLAA and focus on an alternative housing land supply in the form of sustainable urban extensions or make better use of identified Green Belt housing release areas.

The removal of the national indicative minimum of 30 dwellings per hectare.

There does not appear to be any overt reference to 30 dwellings per hectare in the Submission Core Strategy. That said the SHLAA is based on an assessment of gross site density ranging from 30 dph (in all cases it does not look at net density as required by PPS3). In view of the manner in which density is used for the SHLAA it will be necessary to re-consider the SHLAA document and the Schedule C sites to ensure that matters of character are taken fully into account rather. It may be the case that after undertaking this review, and looking more closely at character and amenity, the authority is unable to identify as much new housing from its pdl sites than before and must look to other land for new housing supply.

Yours sincerely



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