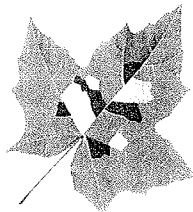


andrew
martin
associates



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Your Ref:
Our Ref: RP/EW/010036/Higby 13-07

Ms Lissa Higby
Council Offices
South Street
Rochford
SS4 1BW

13 July 2010

Dear Ms Higby

Implications for the Core Strategy of the Changes to Government Policy

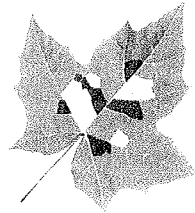
Thank you for your letter dated 14th June, which sought views on the changes to government policy and the implications for Rochford's Core Strategy. As you are aware, we represent a consortium of landowners and we are promoting land known by the Council as "East Ashingdon" and "South-East Ashingdon". We have recently submitted a planning application for land to the north and south of Brays Lane, Rochford for 150 dwellings and a new access/bus turning facility and reserve land for the King Edmund School (LPA ref: 10/00374/OUT).

In light of the recent changes to Government policy, and the revocation of Regional Spatial Strategies (RSS) in particular, we have given careful consideration to guidance that has been issued by the Government. We recognise that further guidance will be issued, but our response below takes into consideration the guidance that has been issued to date.

Revocation of RSS

With regard to the revocation of RSSs, we have turned to the advice issued by DCLG that accompanied the letter dated 6th July from Steve Quartermain to Chief Planning Officers. Section 5 raises the issue of whether LPAs should continue to prepare LDF documents. The response on this is a clear "yes" and states "the revocation of Regional Strategies is not a signal for local authorities to stop making plans for their area". It identifies that LPAs should continue to develop Core Strategies and other DPDs. It goes on to state that LPAs may wish to review their plans following the revocation of Regional Strategies and that such reviews should be undertaken as quickly as possible.

Section 7 goes on to recognise that where LPAs go on to revise emerging policies they will need to ensure that they meet the requirements for soundness under the current legislation. Section 10 identifies that authorities who intend to undertake such a review should "quickly signal their intention to undertake an early review".



Section 12 states that RSS targets can be replaced by "option 1 numbers" if this is the right approach for the area. If this approach is pursued, the advice states that these figures must be supplemented by more recent information as appropriate and authorities should be ready to defend them if challenged.

We understood that RDC will need to give consideration as to whether it keeps to the RSS housing figures, reverts to the "option 1" figures or sets another level in terms of housing requirements. It is our view that the housing numbers from the RSS are appropriate and supported by a robust and credible evidence base.

We have reviewed the various stages of the Core Strategy (CS) and the evidence base which supports it. From the Council's own evidence it is clear that there is a need for additional housing to meet the needs of the district. A summary of our finding is set out below.

The Issues and Options (Regulation 25) CS (2006) considered options for housing numbers including "not attempting to meet the cascaded [RSS] figure due to the restrictive development position vis-à-vis the green belt". Whilst it cited this as a possible option it also cited ensuring enough land to meet RSS figures as a probable option. One of the objectives of the Core Strategy was identified as:

"4. Housing Numbers

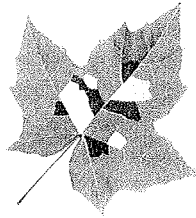
Meet the housing requirements of the East of England Plan"

The Strategic Environmental Assessment and Sustainability Appraisal of the CS Issues and Options document (prepared by ECC) identified that the Core Strategy had four alternatives in regards to housing numbers. These alternatives were subjected to detailed appraisals and it was found that the option of not attempting to meet the RSS requirements (Option A) would have negative impacts in the medium and longer term. With regard to the objective of providing everybody with the opportunity to live in a decent home, it was concluded for Option A that "choosing to adopt this option there will be inadequate housing provision to meet the local need, which will have a negative impact on the provision of a decent home for all". Following these findings, subsequent stages of the CS worked on the basis that RSS requirements would be met.

With regard to the Council's consideration of housing numbers, it is also important to consider the impact on affordable housing provision. The Thames Gateway South Essex Strategic Housing Market Assessment (SHMA) identified the need for 131 affordable dwellings per annum, yet for the period 2008-2009 there were -1 net affordable housing completions. A reduction in the housing targets would be likely to result in a reduction in the number of larger Greenfield sites coming forward, which would have a negative impact on the supply of both market and affordable housing.

The Inspector's attention is drawn to a recent Secretary of State (SoS) decision (appeal ref: APP/M9565/A/09/2114804/NWF) to allow a proposal for 315 dwellings in Tilbury. The SoS's reasoning was that despite the site not being allocated, Thurrock did not have a five year supply of land and it was the quality of the proposal and the fact that it would provide affordable housing in a district where they were behind target. Although we appreciate that all cases are different, many of these principles apply in Rochford.

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Previously Developed Land

This change will have limited implications for the CS and is primarily a matter for the Development Management DPD. In the interim, the government policy will be a material consideration when determining planning applications for development on garden land.

Abolition of Indicative Minimum Density

Again, this change will need to be considered in the Development Management DPD and will need to be taken into consideration when determining planning applications below 30dph.

Summary

In summary, we believe that Rochford should continue with the housing numbers as set out in the RSS to ensure that housing needs for the district are met. In the event that the Council decides to change their housing figures, this should have regard to the impact on strategic objectives and should be undertaken at the earliest possible opportunity to minimise delay and uncertainty.

Whilst we do not consider that the policy changes warrant an additional examination session, and the consequential delay to the CS, we would welcome the opportunity to attend should such a session be held in the future.

Yours sincerely

A handwritten signature in black ink that reads "Emma Walker". The signature is fluid and cursive.

ROBERT POMERY BA(Hons) Dip TP MRTPI
ASSOCIATE DIRECTOR
robert.pomery@amaplanning.com

cc Samuel Hollingworth (Rochford District Council)
Squiers and Crolls
Paul Fosh – Strutt and Parker
EW