



14 July 2010

Lissa Higby – Programme Officer
Rochford Core Strategy Examination
Council Offices
South Street
Rochford
Essex
SS4 1BW

Emailed & Posted

Dear Ms Higby

**ROCHFORD CORE STRATEGY EXAMINATION
RESPONSE ON BEHALF OF ABER LTD**

Further to your letter of 14 June 2010, we are writing on behalf of our client (Aber Ltd), in order to respond to the points raised in the letter regarding the abolition of Regional Strategies and proposed changes to PPS3, notably:

- The definition of previously developed land in Annex B, now excludes private residential gardens; and
- The national indicative minimum density of 30 dwellings per hectare is deleted from paragraph 47.

In response to the above we would forward the following comments:

Abolition of Regional Strategies

Following the recent abolition of the Regional Strategies the local planning authorities will now be responsible for determining the correct level of housing growth for their area. However, it should be remembered that the housing figures contained within the Regional Strategies were not picked out of the air but were based upon a robust assessment of local need in order to meet the planned level of growth in an area.

In going forward the local planning authority will similarly need to base their new housing figures on the number of houses required to stay in step with the projected level of economic growth. In order to achieve this, the local planning authority will need to look at the Strategic Market Housing Assessment, in order to get an indication of local need.

We would hope that in developing their own housing figures the local planning authority would not depart too far from the housing figures contained within the Regional Strategy as this was obviously based on local need. However, we do acknowledge that in light of the current

economic conditions that to deliver this quantum of housing could be extended beyond the current Core Strategy timescale. This approach would still offer a similar level of new units but offer more realistic completion rates.

Removal of private gardens as previously developed land

We welcome the removal of private gardens as previously developed land as in our experience the development of private gardens to create new residential development has a detrimental impact upon the overall environmental quality of the area and the living conditions of the residents. In addition, these types of proposals typically generate considerable local opposition, which often results in the proposal being refused and a subsequent appeal lodged; the uncertainty in this process delays the delivery of new housing.

In order to ensure that new dwellings are provided over the whole plan period, it is necessary to give further consideration to the proper planning of an area by allocating planned communities as opposed to relying on piecemeal sites.

The removal of rear gardens from Annex B of PPS3 will ensure that greater emphasis is given to the delivery of housing as part of properly planned developments, which will be able to contribute towards new infrastructure to the benefit of both the proposed and existing residents.

Deletion of minimum density of 30 dwellings per hectares

In determining the appropriate housing for a site there needs to be balance between maximising the efficient use of land, the capacity of sites, the type of housing, and the delivery of high quality design in order that they are in keeping with the appearance of their immediate environs.

The above approach will ensure that a range of housing to meet demographic and market demands will be provided at suitable locations across the District. Developments in key transport corridors and at community focal points where ability to access services by walking/cycling are maximised should be at a net density of 50 dwellings per hectare or more. Elsewhere, the most efficient use of land should be sought through good design having regard to local characteristics, the type and range of housing provided and prevailing national policy.

Therefore, we welcome the removal of the lower density housing in order to satisfy all sectors of the market. It is important that housing provision meets the needs of the whole of the housing market and that includes the demand for larger family dwellings built at lower densities, which was difficult to achieve with a minimum requirement of 30 dwelling per hectare.

Finally, it should be noted that by removing the minimum density range figure, will mean that certain development will deliver larger family dwellings at lower densities. If the same number of units are to be provided over the plan period, it may necessary to allocate additional land to provide the same number of units on a pro rata basis.

Should you have any questions or queries in the meantime or require further information please do not hesitate to contact Simon Chapman (0207 344 5433), in the first instance.

Yours sincerely

A handwritten signature in blue ink, appearing to read "S. Chapman".

Simon Chapman MRTPI
For and on behalf of Colliers International
DIRECTOR