



Ms L Higby
Core Strategy Programme Officer
Planning Department
Rochford District Council
Council Offices
South Street
Rochford
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16th July 2010

Our Ref: 10/1024

Dear Ms Higby

Rochford Core Strategy Examination: Request for additional comments on Core Strategy General Housing Locations – Audit Trail, and further changes to recently published Government Policy

In respect of the recently published information in relation to housing numbers, locations and targets we have a number of additional comments to make on behalf of Fairview New Homes.

We consider that the revocation of the RSS is a critical issue which would benefit from consideration at a further hearing session. We do not believe the abolition of the RSS warrants the need to withdraw the Core Strategy, as PPS3 continues to maintain the need to identify a five year housing supply which follows from our comments and representations already made previously. However, given that it is unclear what Rochford District Council are choosing to pursue as the housing targets for the District, further discussion is necessary.

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Notwithstanding this, it is our understanding that Rochford's "Option 1" housing figures are the same as the RSS published figures (now revoked), but as discussed below, we consider that the delivery of new houses on garden land (now no longer P.D.L) which makes a significant contribution to overall housing supply, is now at risk, and we maintain that the Core Strategy is at risk of being inflexible.

In respect of the alterations made by the Rt. Hon Eric Pickles MP to the definition of previously developed land and the exclusion of residential gardens, the Core Strategy and the associated evidence base requires additional consideration in light of this. It is clear from the recently published (supporting) paper on Affordable Housing that a significant proportion of the District's housing supply is contributed by smaller sites. Specifically, paragraph 4.6 of that paper (Rochford District Council Viability Study Final Report, June 2010 – prepared by Three Dragons) sets out that (recently: 07/08 to 08/09) 56% of all new dwellings granted planning permission are provided from sites smaller than 15 dwellings, and that 44% of all new dwelling granted permission are from developments of less than 10 dwellings. The important contribution such sites make should therefore not be overlooked.

In addition, it is further important not to overlook the contribution small or moderate sites make towards infrastructure improvements. Pursuing a number of smaller or moderate sites enables the Districts' development risk to be spread, and ensures infrastructure improvements and financial contributions are forthcoming.

It is understood further guidance is due to be published by the Government in the near future and it would, therefore, be pertinent to have a further Core Strategy Examination session following the publication of this guidance. As

previously advised, we would reserve our position to attend any further sessions on this matter.

In respect of the recently published documents relating to the housing location audit trail these are clearly intrinsically linked to housing supply, and our comments made above. We believe that the documents **do not** adequately or transparently set out the Council's decisions when choosing preferred strategic housing locations. There appears to be no further robust evidence provided now, as was the case following the Preferred Options stage in the production of the Core Strategy. In respect of our client's site to the south west of Rayleigh no further information has been provided as to why this is (now) considered a less suitable location. Other than the information provided on page 13 of the Audit Trail document, relating to school capacity, no additional explanation has been provided.

There is no reason why specific developments are not capable of meeting the associated demands for educational requirements (or indeed any others) through financial contributions and we therefore do not consider this an appropriate method on which to base the decisions relating to housing locations in the District. Conversely, the recently published affordable housing viability paper, soon to become a background evidence document, clearly states that in many instances smaller schemes can deliver higher values – paragraph 5.31. We therefore maintain that the evidence base and method employed by Rochford District Council remains questionable.

One such example relates to the initial selection of the sites chosen, and consequently those which Members viewed on site their visits. The LDF Sub Committee Report of 9th February sets out that Members only viewed sites that were capable of accommodating more than 50 dwellings and were not located

within the floodplain. However, the land at London Road clearly does not fall within this criteria, being located in area liable to flooding.

There still appear to be many contradictions in both the existing and emerging evidence base, and the justification as to the approach the Council has taken as to identifying broad strategic locations for housing. We maintain our clients position that the land South West of Rayleigh remains suitable for development, is deliverable and can contribute positively to necessary infrastructure, without any undue pressures on existing infrastructure, and that such delivery can be dealt with through existing Development Control processes.

The Council state on page 36 of the audit document that there are highway/infrastructure concerns in South West Rayleigh (linking to the A127), which may be unviable, but without detailed considerations of this, and the fact that on page 9 of the same report, Officers maintain that Rayleigh has a good road network, this "negative" is questionable. Our client maintains that a well designed scheme of appropriate character/density would not place undue impacts on highway capacity – as is the case with many developments across England.

We would also like to remind the Inspector that the original published SHLAA contained errors, in that it inadvertently identified our client's site incorrectly. Subsequently although our site was incorrectly mentioned, once we had raised this with the Council it was then removed from the SHLAA completely.

In the discussion on page 13 of the document, the Council maintain their approach to identifying key locations as identified in the criteria on page 10, but no further evidence, other than that discussed above, show any clear distinction to the shift in spatial direction. Indeed, on page 17 it suggests that some areas west of Rayleigh are vulnerable in terms of landscape character (not south west

of Rayleigh) but this does not seem to be discussed further. This would clearly have implications for the land north of London Road, a preferred location for housing.

Further, page 19 makes it clear that areas with good access to services, such as Rayleigh, should be maximised, thus it is questionable why land that is constrained, further away from these services, has been identified.

Indeed, there can be little harm on the greenbelt through the identification of land south west of Rayleigh when assessing paragraph 1.5 of PPG2 by releasing or identifying the general location of our clients land as a strategic location, for further detailed consideration in later DPDs.

In summary, our client remains of the view that that the audit trial provides no further clarity as to how the Council arrived at the published preferred options, and that our earlier representations on the submission version of the Core Strategy and direct response to the Inspectors Issues & Matters stand.

Please do not hesitate to contact me should any of the above remain unclear, and I look forward to hearing from you with respect to informing me of any subsequent hearing sessions, so that I may confirm our attendance on behalf of our client.

Yours sincerely



STUART SLATTER

Director