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Ms Lissa Higby
Programme Officer
Rochford District Council
Council Offices
Rochford
Essex SS4 1BW

By post + email
9th July 2010

Dear Ms Higby,

**Rochford LDF Core Strategy – Mr & Mrs Poole, Lime House Industrial Park, Rayleigh
Response to Proposed Changes to Government Policy**

We refer to your letter dated 14th June 2010 seeking comments on the effect, if any, on the Rochford LDF Core Strategy in light of the intention to abolish the East of England Plan Regional Spatial Strategy – (housing targets) and the changes that have subsequently been made to PPS3 by the Coalition Government.

On behalf of our client, Mr & Mrs Poole, we have prepared the following response which we would respectfully request the Inspector to consider.

- i. **The Government's Intention to Abolish RSS Housing Targets** – At the time of writing this letter, the Coalition Government has now announced the revocation of Regional Strategies with immediate effect, although in the longer term the legal basis to abolish them has yet to be enacted via the Decentralisation and Localism Bill that is due to be introduced in the Autumn.

Whilst the RSS no longer forms part of the development plan, PPS3 and PPS12 still remain in force, and provide the baseline guidance upon which Core Strategies should be prepared. There is still a requirement to provide a 5 year housing land supply, and for Core Strategies to identify a 15 year supply of housing land that will enable continuous delivery from the date of adoption.

Whilst Rochford District Council will now be responsible for establishing the right level of housing provision for their area without an obligation to the RSS, the Council will still have to plan for 15 years of housing land supply, which will be based either on an acceptance of the RSS housing target, or an alternative more localised assessment which could be provided by the strategic housing market assessment (SHMA) which is currently a requirement of PPS3.

If the SHMA route is endorsed, then it is highly likely that the Council will need to revisit their methodology, and with the removal of garden sites, this could lead to a revised approach. The Council will also have to look at other sources of evidence of local housing needs derived from housing waiting lists and the housing strategy. However, from the analysis of different projections that was undertaken in the RSS Review of population



growth for Rochford using the Chelmer Model, the projections would not be dissimilar to those currently proposed in the housing targets.

The Government's latest advice issued on 6th July 2010 supports the use of the planning data and research currently held by the Regional Local Authority Leaders Board for the collection and analysis of evidence, and reaffirms the need for local authorities to be able to justify their housing supply policies and defend them during the LDF examination process.

There is potentially a need to re-open the Examination in order to discuss this issue, and provide all stakeholders with the opportunity to comment. We would also request the Council's response on this matter.

- ii. **The reclassification of garden land from previously developed land to Greenfield land in Annex B, PPS3** – The removal of private residential gardens from their definition of previously developed land presents a number of issues for the Core Strategy. This change in emphasis will result in the need to reassess the evidence base upon which the Core Strategy has been prepared, and the choice of housing sites that has been made in the Submission version which was debated at the EiP.

There are a number of sites in the Council's SHLAA which comprise private residential gardens, and we understand that the David Wilson Homes Appeal Site in South Hawkwell includes garden land. This policy shift is significant enough to undermine the broad housing location for South Hawkwell that is identified in the Core Strategy under Policy H2. It may be that following a review of the SHLAA and removal of private residential gardens, that there will be a need to identify alternative sources of housing land supply which could be achieved by allocating additional sustainable urban extensions, primarily in Tier 1 settlements such as Rayleigh, through small releases of Green Belt land adjoining the settlement boundary.

- iii. **The removal of the national indicative minimum 30 dph in PPS3** – Whilst the Core Strategy does not make an explicit reference to 30 dph, the SHLAA is based on an assessment of gross site density ranging from 30 dph. In light of this, it will be necessary to reconsider the SHLAA, and look at issues of character and amenity more closely. The Council will be unable to deliver to the quantum of PDL projected in their housing trajectory, and will need to look at other sources of housing land supply.

We maintain that there is a need for the Examination to be reconvened to discuss the above issues, together with the comments which we have already made to the Housing Audit Trail on 25th June 2010. We would be grateful if you pass on our response to the Inspector.

Thank you for your assistance.

Yours faithfully,


WGDP Ltd

Cc. Mr & Mrs Poole