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Your ref:  
Our ref: CWA/CMW/pl  
Date: 14<sup>th</sup> July 2010

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

**BY EMAIL & BY POST**

Dear Ms Higby,

**ROCHFORD CORE STRATEGY EXAMINATION  
REPRESENTATIONS BY CWA (4961) ON BEHALF OF ILG (9917)**

Thank you for your letter of 14<sup>th</sup> June 2010 seeking views on recent changes in Government policy, specifically (i) the intention to abolish Regional Spatial Strategies (RSS), (ii) the exclusion of private residential gardens from the PPS3 definition of previously developed land (PDL), and (iii) the deletion of the national indicative minimum density of 30 dwellings per hectare (dph). I would comment as follows on each of these issues:-

**Abolition of RSS**

Since your letter was issued, the Government has announced the revocation of RSS under s79(6) of the Local Democracy, Economic Development and Construction Act 2009. As a result, the East of England Plan no longer forms part of the development plan although much of its evidence base continues to carry weight.

Notwithstanding the abolition of RSS, Government policy for housing, as set out in the recently re-issued version of PPS3, remains committed to making full use of PDL to meet housing needs. However, it is not yet known whether Rochford DC will seek to base its assessment of need on the evidence which informs the RSS targets or whether it will review that need in light of a revised local assessment. It is clear that the need for new housing remains, and that central

Government remains committed to ensuring that sufficient new housing is provided on the basis of a local assessment. The Core Strategy's objective of prioritising new housing on PDL, in particular on the vacant and available sites at Stambridge Mills and the former brickworks at Star Lane (part of the Star Lane Industrial Estate), is reinforced by the abolition of 'top down' housing targets. As is clear in Rochford and elsewhere, communities seek to protect themselves from the imposition of housing targets which necessitate the damaging and irreversible release of excessive tracts of Green Belt.

In light of the abolition of RSS, the Inspector may decide to re-open the CS hearing sessions relating to the location and supply of new housing, and to invite further submissions reflecting the recent changes and any further guidance which emerges from national Government in the interim period. Given that further sessions are already programmed, this approach would appear to be in line with PINS guidance.

#### The exclusion of private residential gardens from the definition of PDL

The removal of private residential gardens from the definition of PDL places increased pressure on other land to meet housing needs. The SHLAA makes assumptions about the potential for garden land to provide new housing. Other land which retains PDL status should be prioritised for new housing with particular emphasis on making best use of such opportunities. To do otherwise would be to further increase pressure on Green Belt release in the district.

The sites at Stambridge Mills and the former Star Lane brickworks are available, suitable and achievable as residential development opportunities within the next 5 years. Both of these vacant sites detract from local amenity, and their redevelopment would offer substantial visual, ecological and other enhancements to the locality. Additionally, the flood defence strategy for Stambridge Mills, which has been subject to detailed discussions with the Environment Agency, will protect existing vulnerable residents on adjoining sites from the risk of flooding.

One impact of this change in Government policy on the Core Strategy is therefore to place additional emphasis on the need to maximise use of the PDL sites at Stambridge Mills and the Star Lane former brickworks.

#### The deletion of the national indicative minimum density of 30 dph

The deletion of the national indicative density of 30dph is likely to constrain the delivery of housing on sensitive sites where character and other issues suggest a lower intensity of housing development is appropriate. The site at Stambridge Mills is not constrained in this manner given the very substantial built form on the site at present. The former brickworks site at Star Lane is vacant, and the natural and built character of the surrounding area do not unduly constrain the intensity of future development.

As in the case of the narrowing of the PDL definition, this change to PPS3 therefore places additional emphasis on the need to make best use of the PDL sites of Stambridge Mills and the former Star Lane brickworks.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'C. Wickham', with a large circular flourish on the left side.

CHRISTOPHER M. WICKHAM  
Encs.