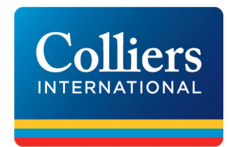


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05 October 2011

Lissa Higby
Programme Officer
Rochford Core Strategy Examination
Council Offices
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SS4 1BW

Emailed

Dear Ms Higby

ROCHFORD CORE STRATEGY EXAMINATION DRAFT NATIONAL PLANNING POLICY FRAMEWORK REPRESENTATIONS

The provision of a sufficient number of homes (including affordable houses), in the right location over the plan period is necessary in order to ensure sustainable development. The level of new dwellings provided should be in-step with the Council's expected level of projected economic growth.

The objective of the Local Development Framework is not just about allocating sufficient land to provide new homes but importantly, it also about ensuring deliverability. This is largely dependent on allocating sites where there is a real prospect (available, suitable and achievable), of delivery within the anticipated timescale. It also requires a mechanism to ensure that sufficient sites are brought forward at the right time to enable delivery.

PPS3 requires that local planning authorities maintain a flexible and responsive supply of housing land that reflects the 'Plan, Monitor, Manage' approach. This supports the need for a clear policy approach that indicates the timing of potential housing sites in relation to the housing trajectory and the five-year supply of land.

The Draft National Planning Policy Framework reinforces the need for plans to identify and maintained a rolling supply of deliverable sites sufficient to provide five-years' worth of housing against their housing requirements. Furthermore, in order to facilitate economic growth it goes on to state that the supply should include an additional allowance of at least 20% to ensure choice and competition in the market for land; this approach is supported as it ensures flexibility and will facilitate the provision of sufficient new housing.



In addition, to the five-year supply of deliverable land, PPS3 also requires a further supply of specific developable sites for years 6-10 and where possible, years 11-15. In the event that the market does not deliver sufficient homes to meet requirements, sites will be brought forward from future year's allocations to ensure housing delivery targets are met.

To ensure that a continuous five-year supply through the Core Strategy there is a need to identify a contingency of housing sites and the criteria by which these sites will be assessed, in order to compensate for any of the preferred locations that may not come forward or do not deliver the target number of dwellings in the required timeframe.

The contingency plan should consider how the delivery of housing will be monitored; develop trigger(s) as to when to move to the contingency plan; and agree an approach on how the contingency will be delivered. Events that could trigger the need for the contingency plan could include amongst other things:

- The delivery of strategic sites are delayed and new housing do not come forward as required;
- Delivery of housing does not come forward at the required rate either because completions fail to keep up with the intended trajectory or a greater number of houses are required as compared to the plan projection.

In order to address this potential concerns with regards the proposed allocations being ineffective or failing to deliver the required number of housing numbers, the Council should maintain a flexible approach with regards to the timing of the release of land for residential development to ensure a constant five-year supply of land. Therefore, if the locations within Policy H2 do not come forward in the required timeframe or deliver the required number of dwellings, then locations with Policy H3 should be brought forward to address this shortfall.

Alternatively, in order to ensure complete flexibility in the delivery of new housing Policies H2 & H3 could be combined into a single policy; this will still maintain the delivery of housing land in accordance with the proposed timescales.

We trust the above comments are of assistance.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S. Chapman', written in a cursive style.

Simon Chapman MRTPI
For and on behalf of Colliers International
DIRECTOR