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BY POST/EMAIL

Dear Miss Higby,

ROCHFORD CORE STRATEGY
CONSULTATION ON DRAFT NATIONAL PLANNING POLICY FRAMEWORK

Following your letter seeking views on the implications of the draft National Planning Policy Framework (NPPF), we write on behalf of Colonnade Land LLP (CLLLP) to confirm how these matters affect the soundness of the Rochford Core Strategy.

It is significant that the draft NPPF is subject to an ongoing period of consultation, so the final content and form of the document is as yet unknown. However, many of the principles of the draft NPPF, as with the changes that were announced in the 2011 Budget and the Written Ministerial Statement 'Planning for Growth' issued by The Rt Hon Greg Clark MP, are being treated as material considerations in planning decisions. Most notably the recent decisions issued by the Secretary of State in relation to the land at Binhamy Farm, Bude and land at Bishopdown Farm, Salisbury. As such, these representations have sought to address the general principles contained within the draft NPPF rather than addressing points of detail contained within the document and the accompanying Impact Assessment.

In summary, we consider the proposed changes to the national planning policy proposed within the draft NPPF support the case made by CLLLP that the Core Strategy is unsound and is unable to be made sound. The rationale for this contention is set out below in further detail.

a) Housing Requirements

The Ministerial Foreword reiterates the presumption in favour of sustainable development and clarifies that development that is sustainable should go ahead without delay. It also confirms the imperative of housing a rising population and identifies sustainable growth as positive development that makes economic, environmental and social progress for this and future generations.

Paragraph 28 of the draft NPPF reiterates the need for a clear understanding of housing requirements within local authority areas. It maintains the importance of Strategic Housing Market Assessments and Strategic Housing Land Availability Assessment as part of the evidence base to achieve this understanding.

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It specifically identifies the need to establish:

“...realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified requirement for housing over the plan period.”

Paragraph 107 confirms that the key housing objective of the Government is “to increase significantly the delivery of new homes.” In order to achieve this, the NPPF includes an additional allowance of at least 20% over the five year rolling supply of specific deliverable sites when measured against identified housing requirements. This is clearly a matter that requires the immediate attention of the Council in the Core Strategy.

To complement this, the draft NPPF also requires local authorities to produce a housing implementation strategy describing how they will maintain delivery of a five-year supply of housing land to meet their housing target.

b) Town Centre

The Planning for Prosperity chapter of the NPPF includes a number of paragraphs on the promotion of vitality and viability of town centres. The emphasis of the section is on the positive promotion of competitive town centre environments. Paragraph 76 sets out a series of criteria that policies should address including the recognition of the town centre as the heart of the community and the role that residential development can play in ensuring the vitality of centres.

The intended locational distribution of housing provision within the Core Strategy is unsound as it fails to maximise available opportunities which:

- Support the viability and vitality of Rochford town centre because of the respective inaccessibility of the proposed housing growth locations.
- Prioritise reduced travel distances for pedestrians and cyclists to Rochford town centre

East Rochford is the only broad location for housing growth which supports the positive promotion of competitive town centre environments set out in the NPPF.

c) Green Belt

The fundamental aim of Green Belt policy in the draft NPPF does not change significantly from that set out in PPG2. However, paragraph 138 confirms that Green Belt boundary reviews should be considered during the preparation of Local Plans, having regard to their intended permanence in the long term. It goes on to state that:

“...they should be capable of enduring beyond the plan period.”

Paragraph 140 goes on to set out a series of criteria to consider when defining long-term, enduring Green Belt boundaries that allow for growth requirements for a period of at least 15 years. The criteria include the need to ensure consistency with the plan strategy for meeting identified requirements, the identification of safeguarded land to meet longer-term development needs and crucially:

“satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period.”

In seeking to meet these criteria, the Core Strategy should make provision for a minimum of 250 residential units per annum for a period of at least 15 years from the date of adoption of the plan. The Core Strategy fails each of these aims by proposing a short term plan that fails to establish Green Belt boundaries that are capable of enduring in the long term.

d) **Conclusion**

The draft NPPF introduces a number of matters that require immediate attention in the Rochford Core Strategy. Most notable being the need to including an additional allowance of at least 20% over the five year rolling supply of specific deliverable sites for housing and the need to establish long-term, enduring Green Belt boundaries that accommodate growth for a period of at least 15 years.

Yours sincerely

David Churchill
DIRECTOR

cc. Andrew Yeardeley – Stratland Management Limited, p.p. Colonnade Land LLP