

Dear Mrs Higby

Thank you for your letter of 9 September inviting comments on effect of draft NPPF on the Core Strategy examination. For various reasons this is a rather limited and late response. Sorry for that.

The draft NPPF at paras. 177 to 186 under Historic Environment risks provisions of Core Strategy in this respect. Draft NPPF advises capturing evidence...particularly where heritage asset is to be lost, that LPA should ensure a conservation area justifies that status, that substantial harm to/loss of Grade 2 Listed building, park, garden etc should be "exceptional". All this doesn't inspire confidence. Whereas Core Strategy at policies CP1, 2, 3 gives much firmer protection. We would not wish to see that watered down.

Under Efficient use of land for housing, at para. 4.15 Core Strategy fears impact of 'town cramming' and therefore calculated former government's target of 60% new development on brownfield land had become unrealistic for Rochford. My comment - there is enough demolition/densification in the district already. Whereas at para.151 draft NPPF says LPAs should not refuse planning permission because of concerns re incompatibility with existing townscape except where concern relates to a designated heritage item..and that is not outweighed by social, economic etc benefits. Townscapes have been ignored in the district with horrible results.

Defined targets are given in Core Strategy, these also subject to dispute. But draft NPPF requires 5 year rolling supply, plus at least 20%. This is all unrealistic.

Draft NPPF expects LPAs to work with neighbouring councils to provide housing. Rochford has enough problems.

Yours sincerely
G Yeadell