

Ref: KC/1027

Date 19 April 2011

Lissa Higby  
Programme Officer  
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Dear Lissa

**Rochford Core Strategy: Invitation for comments on “Planning for Growth” – response on behalf of Countryside Properties (respondent ID 8650)**

I refer to your letter of the 6<sup>th</sup> April regarding the above, and we set out our comments below below.

The recent pronouncement by Government in both the written statement “Planning for Growth” and “The Plan for Growth” place great emphasis on using the planning system to help promote economic prosperity and jobs. Throughout their submissions, Countryside Properties have raised concerns that the Council’s housing delivery strategy is based in no small part on the redevelopment of existing thriving industrial estates for housing purposes (particularly at Hockley and Rayleigh), on the premise that this employment land will be replaced at some point by new commercial development in the Green Belt.

Not only does this approach lack any tangible benefits in terms of the quantum of Green Belt developed, but it offers very real risks that economic prosperity will be damaged in the short-medium term as existing businesses, under threat of relocation, cease to invest in their existing premises.

One of the flagship policies currently out for consultation as a result of “The Plan for Growth” is a proposal to enable re-use of existing commercial premises for residential use, in recognition of the need for additional housing. This may lead to a reduction in existing available business spaces within urban areas, which makes the retention of existing industrial sites all the more important.

Whilst much of the policy in “Planning for Growth” is directed towards the economy, it is of course the case (as the above example illustrates) that the Government remains committed to housing delivery as well, and this is further emphasised in the 23<sup>rd</sup> March Statement. We would suggest that the key message from “Planning for Growth” is contained in the fourth paragraph, which states that Local Planning Authorities should

“ ... make every effort to identify and meet the housing, business and other development needs of their areas, and respond positively to wider opportunities for growth ...”

The Inspector will be well aware from the Hearing sessions that Rochford District Council are not advancing alternative evidence of housing need to justify their 25% shortfall on the RSS housing numbers contained in the Proposed Changes (the background to this calculation is set out in our evidence, and has not been challenged). The evidence still shows a level of



need at least as great as the RSS if not greater, and Rochford is still the least affordable place to live in Essex Thameside, as the SHMA update notes.

Even were it legally/procedurally possible to depart from the requirement of “general conformity” (which for the reasons we have explained previously we believe is not the case), we have argued that the local circumstances for doing so would need to be truly unique and compelling, and that is simply not the case in Rochford District.

The emphasis in Planning for Growth on Local Planning Authorities making “every effort” to meet both housing and other development needs places the ‘bar’ against which a proposal for non-conformity needs to be judged even higher.

We know from the Submission Draft that this Core Strategy can deliver more growth than the Council now seeks to provide. In the context of “Planning for Growth”, we consider that a return to the Submission Draft proposals (corrected for appropriate phasing of the growth locations as per our submissions to H2) and rejection of the Proposed Changes must be the appropriate response.

Yours sincerely

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cc Mr Steve Price – Countryside Properties PLC  
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