



Our Ref: MW/km/07217
Your Ref:
Email: mwoolner@firstplan.co.uk
Date: April 14, 2011

Inspector Laura Graham
c/o Programme Officer
Rochford District Council
South Street
Rochford
Essex
SS4 1BW

By email to Programme Officer

Dear Madam,

ROCHFORD CORE STRATEGY
INSPECTOR'S REQUEST FOR COMMENT ON BUDGET 2011 – PLANNING FOR GROWTH

On behalf of our clients, Stolkin and Clements (Southend) LLP, who own the Tithe Park site, and whom we represented at the Core Strategy Examination hearings, we would like to make the following comments on the planning policy changes that were announced in the 2011 Budget.

The proposed Core Strategy and schedule of proposed changes conflict with the Planning for Growth agenda.

As set out in our resumed examination statement (February 2011), the Rochford Topic Paper 3 'Sustainable Housing Allocation for Rochford District' considers housing need, and confirms that the SHMA and the DCLG projection on housing growth both demonstrated a much higher demand for additional dwellings than that set out within the RSS. Furthermore the SHMA (2010) found a need for 196 affordable dwellings per annum. Despite these high demand figures it is proposed to provide a reduced housing target of 190 dwellings per annum.

The proposed low housing target is inconsistent with the 'Planning for Growth' agenda which sets the expectation that the answer to development and growth should wherever possible be 'yes', and sets out that in preparing development plans, local planning authorities should make every effort to identify and meet the housing, business and other development needs of their areas. By not providing for the identified housing need the Core Strategy is unsound.

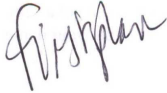
The proposal to provide the housing figure as a maximum is in conflict with this agenda, as it does not provide for a flexible and responsive supply of land which will enable growth.

In considering sustainable forms of development, the allocation of sites for housing as set out in the proposed Core Strategy does not represent the most sustainable option, given the National planning policy objective of locating homes close to jobs and services. The option of developing an urban extension to Southend at Tithe Park is a more sustainable option but has not yet been considered in sufficient depth by the LPA. This approach is supported by the 'Planning for Growth' agenda which asks that Authorities work together to ensure opportunities that extend beyond (or can be met within) their own boundaries are identified and accommodated in a sustainable way.

In conclusion, as currently drafted, Policies H1, H2 and H3 are neither justified nor consistent with national policy and the 'Planning for Growth' agenda reinforces our clients' objection. A sustainable urban extension to Southend in the location of the Tithe Park site could be a preferred choice and will help to deliver sustainable economic growth.

We trust you will take our comments into account, and please keep us apprised of any further matters which may arise prior to the resolution of the Core Strategy.

Yours faithfully,



MIKE WOOLNER
Director