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18th April 2011

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Dear Ms Higby,

Rochford District Local Development Framework
Core Strategy
Inspector Seeks Views On Implications Of Planning Policy Changes & 2011 Budget

I refer to the above and to the Inspector's letter of 6th April 2011, which I picked up from the Council's website. I understand that in view of the significance attached by the Government to the policy changes signalled in their various statements at the time of the budget, the Inspector has requested views as to how they might affect our case and the soundness of the Core Strategy.

I also note with some disappointment that the Inspector apologises that this will mean that her target date of 6 April 2011 for the submission of her report to the Council for its fact checking will now be missed. Our evidence to the Examination demonstrated that the Council's performance on delivering housing and growth had been poor, and that there were demonstrable shortfalls in meeting housing requirements, particularly affordable housing, which needed addressing as soon as possible. The Government expresses some concern on the low levels of housing completions and limits on land supply within the current planning system.

The delays whilst the Examination was reconvened coupled with the current consultation will serve to accentuate shortfalls whilst the planning position is clarified, increasing the need to bring



development forward sooner. In saying this, we do of course understand the high priority and the significant weight given by the Government's statements to the reform of the planning system to promote sustainable economic growth and jobs, and the need to seek participants' views on the implications of these changes.

The background to the Government's changes is relevant, as they make clear the overriding need to support enterprise and facilitate housing, economic and other forms of sustainable development, including the need to consider fully the importance of national planning policies aimed at fostering economic growth and employment, given the need to ensure a return to robust growth after the recession. In addition they stress the need to maintain a flexible and responsive supply of land for key sectors, including housing; the need to consider the range of likely economic, environmental and social benefits of proposals; and to ensure that they do not impose unnecessary burdens on development.

In particular, it states in para 2.9 that the Government is committed to ensuring that the planning system does everything it can to support growth. It states that this statement of Government policy is capable of becoming a material consideration in local planning decisions with immediate effect and local authorities should press ahead and put in place development plans that are progrowth.

Our case to the original and reconvened Examination stressed the importance of maintaining a flexible and responsive supply of land in accordance with the advice of PPS3, and to plan on the basis of RSS figures being minimums rather than targets. This accords with the thrust of the Government's budget statements. However, the Council's proposed phasing policy is too rigid and inflexible to enable current deficiencies to be met or to enable a flexible supply of housing to be delivered. This is borne out by the Council's inability to respond quickly over the last 10 years to growing deficiencies, as set out in our evidence to the reconvened Examination.

The economic, environmental and social benefits of the Hullbridge proposals have been previously set out in our evidence, and in particular the capacity within existing schools; the

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minimal infrastructure improvements required; and the ability to anchor the undertrading retail

centre.

As a consequence, we consider that the Government's budget statements reinforce PPS3's

emphasis on flexibility and encouraging sustainable development, and reinforce the case we

have put forward in this regard at the Examination. Despite this, many of the measure that the

Government intends to put into place summarised in para 1.34 will post date the Core Strategy

and as such the impact on the current submission Core Strategy could be argued to be neutral at

present, but highlights the Government's 'direction of travel' which emphasises the case we have

made.

More importantly, in paragraph 2.12 it stresses the expectation that authorities should have an

up-to-date core strategy in place, and with this in mind we would urge the Inspector to find the

original Submission draft of the Core Strategy sound as soon as possible, with the flexibility

requested on phasing.

Yours sincerely,

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