



**Rochford District  
Council**

**Rochford District Council**  
C/o Council Offices, South Street,  
Rochford, Essex SS4 1BW

Our reference: RDC/PFTF/RJ

Rt Hon Robert Jenrick MP  
House of Commons  
SW1A 0AA

**ALSO SENT BY EMAIL**

Date: 9 November 2020

Dear Mr Jenrick

We are writing to you today to express our concerns over the revised method that the Government proposes to introduce to ascertain local authority housing requirements.

Rochford is a rural district with very little brownfield land and large areas of Green Belt. The proposed method raises an already challenging target of c.380 homes per year to c.590 homes per year, the achievement of which would necessarily require significant development on Green Belt, greenfield land and put enormous strain on local infrastructure.

We feel that the proposed standard method is an extremely arbitrary one-size-fits-all model. From our point of view in Rochford, which has a large commuter residency base, against a much smaller locally employed base, the earnings differential heavily distorts the modelling when only the local earnings ratio is taken into consideration. Furthermore, we would like to raise our particular concerns around the arbitrary and volatile nature of the 10 year affordability factor. We would note that where an alternative period of 9 years is used, we have observed a 15% drop in the figures. This suggests that the outcome of the proposed method is likely to change dramatically each year creating more uncertainty and speculation for both local communities and the development industry.

We would also like to express our concerns regarding the proposed infrastructure levy, which on the face of it sounds positive. However, as we looked closer at this proposed policy, we became concerned that local authorities will face disproportionate responsibility and risk for facilitating the required infrastructure upfront.

The proposed policy infers that the initial costs of the infrastructure will be recouped upon occupation of the properties when sold. For larger phased developments, a significant number of homes may become occupied before the developer has contributed enough to pay for the infrastructure required. Even at this point, it may still take years for the infrastructure to be operational. In the interim period we are concerned that there is no obvious funding stream or

loan support scheme from Government to support local authorities in delivering the said infrastructure when it is required without taking on a disproportionate burden of risk.

With reference to our concerns, we would be grateful if in your reply you would give greater clarity and assurance over the impacts of these proposals on authorities such as ourselves, with large Green Belt areas as well as other constraints, together with communities that have a larger than normal commuter base.

We fully acknowledge the need to build more housing where it is most needed, and we can support changes that can make the planning system more manageable and understandable. However our concerns centre on those proposals that would seem to us neither manageable nor understandable in their current form.

We would be grateful if you could ensure your response is sent to all three email addresses provided below.

Yours sincerely

A handwritten signature in black ink, appearing to read 'S. E. Wootton', with a horizontal line underneath.

Cllr Simon E Wootton, Leader of the Council  
cllrsimon.wootton@rochford.gov.uk

A handwritten signature in black ink, appearing to read 'Ian H Ward', with a horizontal line underneath.

Cllr Ian H Ward, Portfolio Holder for Planning and Enterprise  
cllrian.ward@rochford.gov.uk

A handwritten signature in black ink, appearing to read 'Dave J Sperring', with a horizontal line underneath.

Cllr Dave J Sperring, Chair – Planning Policy Committee  
cllrdavid.sperring@rochford.gov.uk