

## **Rochford District Council Core Strategy: Schedule of Changes**

### **Rochford District Council response to Matters and Issues 18<sup>th</sup> January 2011**

#### **1. General**

- (a)** Given that the East of England Plan remains in place as part of the development plan, in what ways and to what extent would the proposed changes result in the Core Strategy failing to meet the requirement to be in general conformity with the East of England Plan, and are there any local circumstances that would justify any lack of conformity?

It is the Council's view that the proposed changes to the Core Strategy are a credible, realistic and robust basis for spatial planning of the District over the next twenty years.

The changes proposed to the plan will deliver a quantum of housing that reflects an appropriate balance between need for housing in the district, the physical and environmental capacity of the district to accommodate new housing and the protection of the Green Belt. The plan, monitor, manage approach advocated for the delivery of housing will ensure the release of Green Belt land is minimised across the Plan period.

As stated within the Core Strategy Submission Document a large proportion of the District is currently allocated as Metropolitan Green Belt, and notwithstanding this, due to its location within a peninsular between the Rivers Thames and Crouch and bounded to the east by the North Sea, a significant area of the District is also Flood Zone. In terms of local circumstance, the District is heavily constrained with little suitable land available for development.

The reduction in annual delivery of dwellings from 250 to 190 per annum, accepting the RSS31 option 1 figures, is a clear and rational approach to housing delivery; the overall quantum of housing to be delivered varies little, but the lower annual rate over a slightly longer plan period reflects a more measured approach taking account of the need to deliver improved infrastructure to support development and minimising the release of Green Belt land by enabling reallocation of previously developed land, and intensification of the existing built up areas, to make a contribution to overall housing requirements.

RSS31 was agreed by the Regional Assembly and submitted to government for approval in March 2010. The draft plan proposed revised housing figures for the period 2011 – 2031, having regard to the views of stakeholders and was also supported by Sustainability Appraisal and Habitats Regulation Assessment.

This view is further supported by Government advice that Authorities may base revised housing targets on the level of provision submitted to the original Regional Spatial Strategy examination (Option 1 targets), together with a response by Robert Neil (Parliamentary Under Secretary of State at the Department of Communities and Local Government) to a parliamentary question in which he confirmed that the 'Option 1' figures for authorities in the East of England were the number specified in the draft East of England Plan review.

(<http://www.publications.parliament.uk/pa/cm201011/cmhansrd/cm100701/text/100701w0008.htm>).

Topic Paper 3 – Sustainable Housing Allocation for Rochford District, which was published alongside the Schedule of Changes (18<sup>th</sup> October 2010) details the studies and evidence that were drawn upon when examining the issue of housing need within the District.

([http://www.rochford.gov.uk/PDF/cs\\_topic\\_paper\\_3.pdf](http://www.rochford.gov.uk/PDF/cs_topic_paper_3.pdf))

During the plan preparation the Council has followed all requirements set out in published legislation and guidance in the preparation of the Core Strategy. The full published evidence base, together with Council/Committee minutes underpins and justifies the plan preparation process.

The schedule of changes to the Core Strategy is supported by an updated Sustainability Appraisal.

- (b)** What weight should be given to the Secretary of State's intention to abolish Regional Spatial Strategies, and what are the implications for the Inspector's consideration of the proposed changes?

The Localism Bill now published provides for the abolition of Regional Spatial Strategies. Whilst there may be some merit in the view that little weight be given to the letter from the Secretary of State as evidenced by the Cala Homes challenge, it is clear, following the publication of the Bill, that any legal challenges are of very short term interest.

There is little, if any doubt, the Localism Bill will become law and whilst there may inevitably be changes to the contents of the Bill as it proceeds, it is unlikely the clause revoking RSSs will be changed or deleted.

That being the case, it is entirely appropriate for Rochford to seek to put in place a Core Strategy as soon as possible that will deliver long-term certainty about development in the district.

The schedule of changes to the Core Strategy are intended to deliver a significant level of housing building in the district, over a slightly longer

period and lower annual rate, but nevertheless still wholly in accordance with the principles set out in the Localism Bill and reflected in government announcements of the need to deliver more housing. The strategy set out in the proposed amendments to the Core Strategy are aligned closely with the coalition government's ambitions for housing.

The Council concludes the Core Strategy is sound and is a sound response to the emerging changes to the Planning system as set out in the Localism Bill.

## **2. Location and Supply of New Homes**

### **(a) Would the revised CS meet the requirements of PPS3, having particular regard to paragraph 33 and paragraphs 52 – 61?**

The housing proposals are based on a robust assessment of future levels of need and demand (SHMA 2008 and 2010). The SHMA (2008, 2010) sets out the level of need for affordable housing, and the Core Strategy takes this into account in determining an appropriate level for affordable housing balanced against the demand for market housing, the environmental capacity of the district and the need to minimise the release of greenbelt land.

The National Housing and Planning Advice Unit has been abolished. The NHPAU was set up in 2006 with the challenge of helping to make housing more affordable and address the rising trend in the number of people prevented from getting onto the property ladder.

The latest household projections have only recently been published (26<sup>th</sup> November 2010), but nevertheless the plan, monitor, manage approach advocated for the plan allows for flexibility in housing delivery.

The SHLAA was published in November 2009, and will be reviewed on a regular basis. The analysis provided within the SHLAA was taken into account during the Core Strategy process, and as such the SHLAA forms a key part of the evidence base behind the Core Strategy Submission Document and the Schedule of Changes. The regular review of the SHLAA, alongside the publication of the Annual Monitoring Reports will ensure that the Council can utilise the plan, monitor, manage approach to development, and make certain that sites are deliverable at the most appropriate times. This approach will also make certain that there is a continuous five year supply of deliverable sites.

The Core Strategy will deliver a mix of affordable housing types that reflect the needs of the districts population.

The Core Strategy has undergone Sustainability Appraisal at every stage, ensuring that the most suitable locations within the District have been selected for development. Notwithstanding this the Council has worked alongside service providers throughout the development of the Core Strategy to ensure that the impact of development on infrastructure can be mitigated, planned for, and provided for.

- (b)** Is there sufficient justification for using the Option 1 figures from the East of England 2031?

The Council takes the view that the option 1 figures will deliver an appropriate quantum of housing over the extended plan period. The acceptance of the option figures reflects the contents of the information provided to Local Authorities in the appendix to the letter of 6<sup>th</sup> July 2010 from the Chief Planning Officer.

(<http://www.communities.gov.uk/documents/planningandbuilding/pdf/1631904.pdf>)

The option 1 figures were developed as a part of a detailed analysis and assessment carried out to support the preparation of RSS31. The figures are supported by a detailed evidence base.

- (c)** Would the revised CS comply with the requirement in PPG2 that Green Belt boundaries should be revised only in exceptional circumstances?

The Council has carefully considered its choices and options for delivering housing requirements taking account of the need to protect and maintain the Green Belt.

The proposals for housing set out in the schedule of changes and taking account of a plan, monitor, manage approach will deliver new housing to meet local need, at appropriate, sustainable locations but with an emphasis on minimising Green Belt release of land.

- (d)** To the extent that the revised CS allows for the potential release of Green Belt land to meet housing needs, is there sufficient clarity on when and how such land would be released, for example what would trigger the need to review the Green Belt boundary?

The Council considers that the Core Strategy as amended will clearly set out the arrangements for release of Green Belt land to contribute to housing need. It should be borne in mind that detailed site allocations reflecting the proposals in the Core Strategy will follow in the Allocations DPD. The Core Strategy sets out general locations for housing, and timescales within which the housing will be delivered.

The policies within the Core Strategy (particularly H2 and H3) together with the key diagram provide absolute clarity as to where, how and

when sustainable residential development can be delivered within Rochford District.

- (e) Would the revised CS provide sufficient flexibility and continuous supply of housing land?

The Core Strategy in adopting a plan, monitor, manage approach will ensure a highly flexible, responsive approach to housing delivery over the plan period.

Policy H2 also states that “The Council will maintain a flexible approach with regard to the timing of release of land for residential development to ensure a constant five year supply of land.” Alongside this the SHLAA has identified the potential for a greater quantum of development at the general locations than is required. The plan, monitor, manage approach will enable the Council to ensure that the most appropriate and sustainable developments can be delivered first, whilst enabling flexibility.

The SHLAA and AMR should be treated as “living documents” and the housing figures proposed will be reviewed on an annual basis to ensure that a rolling supply of deliverable and developable housing sites are available over the short, medium and long term.

The number of houses being built will be monitored on an annual basis to ensure the housing need is being met, and that the houses are being built in the most suitable and sustainable locations.

The Council has committed to delivering no more than 3,800 dwellings between 2011 and 2031. Any changes to the housing trajectory i.e. sites without planning permission has been come forward in that year will be updated in the Annual Monitoring Report (AMR) which is published at the end of every calendar year. The AMR will then be used as a tool to put the flexible plan, monitor, manage approach into practice.

### **3. Sustainability**

- (a) Would the proposed changes have a positive or negative impact on sustainability and would the revised CS strike the right balance between meeting development needs and environmental considerations?

The Sustainability Appraisal confirms the Schedule of Changes will have a positive effect. The range of affordable housing to be provided will not be reduced.

There are several positive impacts noted within the Sustainability Appraisal including the statements that extending the time period over which housing will be delivered will have positive effects on smaller settlements “as the total number of houses may be spread over a longer period, giving an increased period of time for infrastructure improvements to be implemented and to allow development to integrate with existing communities.” An overall summary of the conclusions of the Sustainability Appraisal stated that “The proposed changes to policies H1, H2 and H3 relate to the extended phasing of housing proposed in the Core Strategy. This extended delivery time was found to have positive effects for SA objectives relating to the environment, including water, climate change and land and soils. Extending the time period for the delivery of housing will result in the delivery of fewer dwellings per year therefore reducing pressure on environmental resources. Dwellings constructed toward the end of the time period are also more likely to have to meet more stringent sustainability targets. The Code for Sustainable Homes has staggered targets; extending the time period for the delivery of housing could therefore result in a greater number of dwellings meeting a higher standard of the Code for Sustainable Homes, having positive effects on water and climate change.”

The Sustainability Appraisal fully reflects an assessment of the balance to be struck between delivering an appropriate level of housing (and other development to meet social and economic needs) in a district with significant environmental constraints and Green Belt policy protection.