

## Topic Paper 5: The Implication of Changes to PPS3

- 1.1. The government has recently made two key amendments to PPS3:
  - The definition of previously developed land (in Annex B) now excludes private residential gardens; and
  - The national indicative minimum density of 30 dwellings per hectare is deleted from paragraph 47.
- 1.2. This paper looks specifically at whether the above two changes impact on the Rochford District Core Strategy.
- 1.3. With regards to density, although there is no longer a defined minimum density for developments, in accordance with PPS3, it is important to ensure the efficient and effective use of land.
- 1.4. The Strategic Housing Land Availability Assessment (SHLAA) (2008) examines potential sites for housing development, including an assessment of their capacity. In examining this issue, the SHLAA (2008) assumes a density based on the particular circumstances of the site in question, and in most instances assumes a net density of between 30 and 45dph (dwellings per hectare).
- 1.5. The Affordable Housing Viability Assessment (2010) tested a range of densities and found that in testing 20dph; lower density development will still provide positive residual values, although significantly below those at 30dph (see paragraph 3.15 and 3.16). Residual values are higher for development at 45 dph (see paragraph 3.12). The former minimum density of 30dph stipulated in PPS3 is therefore, in general, considered to be an appropriate minimum density to continue to apply to Rochford District, particularly in terms of estimating residential capacities of potential sites.
- 1.6. It is also pertinent to note that policy HP3 of the Replacement Local Plan (2006) required new residential development to be implemented at a density of at least 30dph, and stated that the best use of land will be achieved through development in the range of 30-50dph (see page 25). However, as this policy repeated that contained within PPS3 at the time, the Council did not apply for it to be saved – as a local policy which repeated national guidance it did not meet the criteria for being saved. However, this does not mean that the Council’s position on density has changed.
- 1.7. Changes to the definition of garden areas within PPS3 do not impose a moratorium on the development of garden areas, but it does give further weight to the Council’s concerns vis-à-vis ‘town-cramming’ and the need to protect the existing character of residential areas. The

changes to PPS3 support aspects of Policy H1 of the Core Strategy Submission Document which address intensification and infilling.

- 1.8. The amendment to the definition of previously developed land to exclude gardens areas does not affect the calculated housing land supply as identified in the SHLAA (2008). The SHLAA (2008) does not rely on garden areas being designated as previously developed land when identifying the District's housing land supply for the plan period. Calculations of housing land supply do not, as per the guidance, include an estimation of windfall sites (likely to include the development of as yet unidentified garden areas) and existing planning permission for undeveloped garden areas remain extant regardless of changes to PPS3.
- 1.9. In any case, it is still appropriate to permit limited infilling within the existing residential envelope, as this will reduce the pressure on Green Belt sites for future development whilst ensuring the efficient and effective use of land within the urban area.
- 1.10. In summary, neither of the changes to PPS3 addressed within this paper in themselves warrant changes to the Core Strategy Submission Document.