

Rochford District Council

Planning policy changes in the 2011 budget - implications for Rochford District Council's Core Strategy

- 1 The following statement has been prepared in response to the Inspector's invitation to submit views as to how the planning policy changes that were announced in the 2011 Budget recently (particularly the Written Ministerial Statement 'Planning for Growth' issued by The Rt Hon Greg Clark MP, Minister of State, on 23 March 2011, and the further details contained in the Treasury's 'The Plan for Growth') might affect the soundness of the Core Strategy.
 - 1.1 The key messages and changes to planning policy from 'The Plan for Growth' and 'Planning for Growth' relevant to the Rochford District Core Strategy are as follows:
 - o Local planning authorities should press ahead and put in place development plans that are pro-growth;
 - o Local planning authorities should prioritise growth and jobs, and support the economic recovery;
 - o The government will introduce a presumption in favour of sustainable development, and wants to see more development in suitable and viable locations;
 - o Local authorities will not be able to adopt plans that impose unsupportable burdens on developers;
 - o The government will enable businesses to bring forward neighbourhood plans and neighbourhood development orders;
 - o The government is committed to maintaining the Green Belt and other environmental designations;
 - o The government will localise choice about the use of previously developed land, removing nationally imposed targets;
 - o The government will require local authorities and public bodies to co-operate on planning issues

Each of the above points is considered in turn below.

2 Local planning authorities should press ahead and put in place development plans that are pro-growth

- 2.1 The Council is seeking to press ahead with its Local Development Framework. The irony that the issuing of guidance encouraging local planning authorities to press ahead with development plans has caused the production of this Development Plan to be delayed is not lost on the Council. Whilst the Council is disappointed that it is being prevented from progressing its Local Development Framework through delays to the Core Strategy examination process, it recognises the need for the

latest new government guidance and statements to be given due consideration.

- 2.2 The Core Strategy is positive about development, setting out a strategy for housing and employment-generating development. This has been balanced with the need to consider environmental constraints, the importance of which the government has recently reiterated as discussed later within this statement. The Core Strategy has tackled potential conflicts between environmental constraints and economic development positively; ensuring decisions are based on robust evidence. For example, the amount of Green Belt land to be allocated for employment land is taken from the Employment Land Study's conclusions on identified need.

3 Local planning authorities should prioritise growth and jobs, and support the economic recovery

- 3.1 The Core Strategy sets out a clear strategy for development and job creation. Ensuring the delivery of the spatial aspects of the Economic Development Strategy is one of the key elements of the Core Strategy.
- 3.2 In particular, the Core Strategy supports the preparation of a Joint Area Action Plan focussed on the development of London Southend Airport and a related new business park – expected to be a key economic driver for the sub-region.
- 3.3 It is important that the Core Strategy is adopted in a timely manner, to provide clarity and certainty for developers and investors, which in turn will significantly aid economic development in the District.

4 The government will introduce a presumption in favour of sustainable development, and wants to see more development in suitable and viable locations

- 4.1 The proposals in the Core Strategy are supported by a sustainability appraisal. As such, the Core Strategy will provide a cogent strategy for the delivery of sustainable development in the District, considering sustainability holistically across the District.
- 4.2 The Core Strategy will ensure development takes place in suitable and viable locations, with due consideration of cumulative impacts and the interrelationship between employment, housing, infrastructure and service development.
- 4.3 It is also pertinent to note the conclusions of the Inspector in considering the appeal for the development of approximately 330 dwellings, and associated infrastructure at Land between Main Road and Rectory Road and Clements Hall Way, Hawkwell (Ref. APP/B1550/A/09/2118700).

In considering the application, which was contrary to the submitted Core Strategy, the Inspector concluded:

“Although the appeal site is in itself a sustainable location for residential development, I agree with the Council that the issue of sustainability is one that affects the whole of the SCS [Submission Core Strategy].... General Locations and their identified dwelling quantum are interdependent with the identification of employment land and with infrastructure. Directing almost twice as much housing development to the South Hawkwell location than is proposed in the SCS could, in my view, have a destabilising influence. Accordingly, I consider that allowing the appeal proposal before the result of the Examination into the SCS is known could prejudice the effectiveness of the Core Strategy and thereby the Council’s sustainable strategy for the distribution of housing in the District.” (paragraph 230 of the Inspector’s report).

The above illustrates that sustainability cannot be considered in isolation, on an ad-hoc basis; that cumulative factors and the interrelationship between proposals should be considered; and, therefore, the importance of the Core Strategy to ensure a cogent strategy is in place to deliver sustainable development.

5 Local authorities will not be able to adopt plans that impose unsupportable burdens on developers

5.1 The Core Strategy proposes that planning obligations and standard charges be set at a rate such that development is viable.

5.2 Paragraph 9.4 of the Submission Core Strategy states:

“It is important that the requirements set by standard charges do not render the delivery of development unviable, i.e. it should not be set at such a high rate as to prevent development. As such, when drawing up the details of how the standard charges will be applied in Rochford District through the production of an Infrastructure and Standard Charges Document, the Council will engage with key stakeholders within the development industry in particular.”

Policy CLT1 includes the following text:

“...[The contribution required by the Standard Charge document] will be developed in conjunction with key stakeholders, including developers and service providers, having regard to the size and impact of developments, as well as impact on economic viability.”

5.3 Policies in the Core Strategy recognise the need to ensure that requirements set for developers are viable, and therefore includes

caveats to ensure such factors are taken into account (e.g. in Policy H4 – Affordable Housing, and Policy ENV8 – On-Site Renewable and Low Carbon Energy Generation)

6 The government will enable businesses to bring forward neighbourhood plans and neighbourhood development orders

- 6.1 It is clear that the government will require neighbourhood plans brought forward by businesses to comply with the “local authority plan” (in this case the Core Strategy). Given this chain of conformity, and that there is nothing within the Core Strategy which precludes the production of a neighbourhood plan within the District, the soundness of the Core Strategy is considered to be unaffected by this issue.

7 The government is committed to maintaining Green Belt and other environmental designations

- 7.1 The Core Strategy will ensure that the vast majority (approximately 99%) of the District’s Green Belt is maintained. In addition, the Core Strategy proposes various other environmental designations, including the Coastal Protection Belt and Upper Roach Valley.
- 7.2 The government’s commitment to maintaining the Green Belt gives further weight to the Council’s proposal that housing quantum from Green Belt release (as set out in Policies H2 and H3) be set as maxima.
- 7.3 There is potential conflict between the government’s stated commitment to maintaining Green Belt and other environmental considerations, and its requirement for Local Planning Authorities to be positive about development, particularly that which promotes jobs and growth. However, Rochford District’s Core Strategy already addresses this issue, setting out a positive approach to development based on identified need, whilst ensuring Green Belt is maintained as far as practicable.
- 7.4 It is clear from the government’s stated commitment to maintain the Green Belt and other environmental considerations that the government is not seeking to allow a “planning free for all”, and that the government recognises – as does the Core Strategy – that areas such as Rochford District are subject to environmental constraints which must be considered in planning for growth. As such, the Core Strategy echoes the government’s approach in that it promotes sustainable development whilst maintaining the Green Belt as far as practicable.

8 The government will localise choice about the use of previously developed land, removing national targets

- 8.1 The submitted Core Strategy already acknowledges (paragraph 4.15) that the government's target of providing 60% of new housing development on previously developed land has become unrealistic for Rochford, having regard to the findings of the Strategic Housing Land Availability Assessment.
- 8.2 The Core Strategy seeks to utilise previously developed land ahead of greenfield sites where appropriate and available. Notwithstanding the potential removal of government targets on use of previously developed land, such an approach is considered appropriate, is supported by Sustainability Appraisal, and existing government policy (PPS3).
- 8.3 The results of community involvement have made clear that use of previously developed land ahead of greenfield, and the protection of the Green Belt, are important for the local community of Rochford District.

9 The government will require local authorities and public bodies to co-operate on planning issues

- 9.1 Local Planning Authorities are already required to have regard to policies of neighbouring authorities, and this is reflected in the number of cross-boundary issues addressed in the Core Strategy.
- 9.2 The preparation of the London Southend Airport and Environs Joint Area Action Plan is one of the most prominent cross-boundary development issues, and this is addressed within the Core Strategy.
- 9.3 In determining housing numbers the Core Strategy has also had regard to cross-boundary issues. The Council worked with neighbouring authorities within the same identified housing market area to produce the Thames Gateway South Essex Strategic Housing Market Assessment, the results of which have fed into the Core Strategy. The Council's proposal that the housing allocation for the District be set at 190 dwellings per annum reflects the figure agreed by local authorities and other stakeholders in the East of England Plan draft review (RSS31), and thus represents a housing figure that has been considered in terms of its wider regional impacts, and in terms of Rochford's role in the housing market area, and not simply by considering Rochford in isolation.
- 9.4 Rochford District Council's Soundness Self Assessment – as submitted with the Core Strategy as part of the examination process – provides further details on cross-boundary working undertaken in the production of the Core Strategy (see Key Question 15 of Self Assessment).

10 Overview

- 10.1 In summary, key messages and changes to planning policy from 'The Plan for Growth' and 'Planning for Growth' are generally supportive of, and compliment, Rochford District's Core Strategy.
- 10.2 The Core Strategy sets out policies which are positive on development, in particular employment and housing, within the environmental limits of the District – balancing need and demand with constraints.

Rochford District Council
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