

ROCHFORD CORE STRATEGY - PREFERRED OPTIONS CONSULTATION

1 SUMMARY

- 1.1 In June and July 2007, the draft Core Strategy was subjected to 6 weeks of consultation, which included a series of public participation events, letters to statutory consultees and those registered on a database, school workshops, and information on the Council's website. A key conclusion from the consultation is that a further round of public consultation would be appropriate before the preparation of the submission version of the plan.
- 1.2 Nevertheless, the large number of responses made to the draft is to be welcomed, and will be used to inform the preparation of a revised draft of the Core Strategy. This report summarises the main points emerging from the consultation.

2 INTRODUCTION

- 2.1 As part of the new Local Development Framework the Council is required to produce a Core Strategy. This document will set out the general approach and strategy for the development of the District up to 2021.
- 2.2 The Core Strategy is produced in three stages: the Initial Issues and Options; the Preferred Options and Submission. After analysing the results of public participation, the sustainability appraisal and strategic environmental assessment of the Initial Issues and Options draft, the Council produced its Preferred Options draft and went out to public consultation on the document in accordance with Regulation 26 of The Town and Country Planning (Local Development) (England) Regulations.
- 2.3 Having regard to the results of community involvement and other assessments, such as the sustainability appraisal, the next stage would be for the Council to prepare a Submission version of the Core Strategy to include the detailed policies and proposals necessary to implement the preferred options. As the name suggests, this draft would be submitted to the Secretary of State and undergo a public examination arranged by the Planning Inspectorate. At the submission stage, there will be further opportunity for public involvement through participation in the examination process.
- 2.4 However, the submission stage is limited to an assessment of the 'tests of soundness', and no further 'policy' or 'allocation' changes can be considered. Once the public examination is complete the Planning Inspectorate will decree that either the document is sound, sound subject to changes, or is unsound. In the case of the document being found to be sound or sound subject to changes the Council may then formally adopt the Core Strategy. If the Core Strategy is found to be unsound the Council will have to revise the document,

almost inevitably, depending on the outcome of the examination, having to return to a much earlier stage in the production process.

- 2.5 That being the case, it is essential that the earlier issues and options and preferred options stages are supported by sufficient detail and empirical data to explain the rationale for the submission version and to ensure the public examination confirms the proposals to be sound.

3 COMMUNITY INVOLVEMENT

- 3.1 In June and July the Council undertook a variety of community involvement exercises on the Core Strategy Preferred Options. These ensured that the Council not only met the minimum requirements set out in the Town and Country Planning (Local Development) (England) Regulations, but exceeded them, as per the Council's adopted Statement of Community Involvement.
- 3.2 The Council utilised its new online consultation system for the first time for consultation on the Core Strategy. The system allows respondents to submit and view comments online, and enables the Council to analyse large volumes of correspondence more effectively. A link to the system was placed on the main page of the Council's website, along with a rolling banner promoting the opportunity to participate.
- 3.3 Those on the Council's Local Development Framework mailing list – which comprises statutory consultees along with groups and organisations who may have interest in the development of the District, and members of the public who have requested to be kept updated with opportunities to participate – were written to informing them of the consultation period and encouraging them to submit views using the online system. Groups written to inviting comment included those representing sections of the society who have traditionally been underrepresented in the planning process. Mindful that the over-reliance on electronic communication may exclude some sections of society, the opportunity to comment via written correspondence was also made available.
- 3.4 Notices were published in local papers and a press release was issued via the Council's Corporate Communications Officer.
- 3.5 Public exhibitions / meetings were staged at various locations across the District, primarily on evenings and weekends, in order to cater for those who do not normally have the opportunity to talk to Council Officers during office hours. Information available at the public exhibition was exactly as available in Rochford Council Offices, Rayleigh Civic Suite and online on the Council's website.
- 3.6 Notwithstanding information on display at the exhibitions being available from a variety of sources, there appeared to be a false expectation amongst many of those attending the exhibitions that additional information would be

available there and / or they would miss out on an opportunity to participate if they did not attend. This caused some confusion and frustration for members of the public and is a lesson to be learned in connection with the new process. The nature of the Core Strategy does not lend itself easily to public participation as people generally were more interested in detailed allocations, which is not the intended purpose of the document.

- 3.7 The volume of people attending the exhibitions varied from venue to venue, with some unexpectedly high turnouts in certain locations. Attendance in most, but not all, areas was considerably higher than at the last round of consultation. This was, it is believed, partly due to the Council learning from the previous stage and improving publicity for the events and also from increased media interest. In Rayleigh, where there was a particular concern that the exhibition event venue and timing would not meet the demand, the Council attempted to rectify this by inserting an additional exhibition into the schedule and by promoting the alternative sources from which information on display at the exhibitions was available. Although most events were held in the evening or at weekends, and times and locations varied, concern was still expressed by the public that they would be unable to attend events and that there was only one or two events in each area.
- 3.8 Having regard to the above, further consideration will need to be given to the choice of venues and timings. In the staging of future participation events the use of un-staffed static exhibitions alongside staffed exhibitions / meetings will be utilised. This will allow for exhibitions to be staged for longer – up to as long as the whole consultation period if required – thereby increasing the number of people reached. The Area Committee system will also be utilised. However, it is recognised that whatever mix of methods and formats is utilised, it will be difficult to meet all public expectations and requirements. Nonetheless, the communication network now in place is certainly more extensive in terms of providing community information and access.
- 3.9 In addition to being encouraged to submit formal representations on the Core Strategy, the public and other stakeholders were invited to join the Council's Local Development Framework mailing list so that they could be kept updated with development in planning policy and opportunities to submit comments.
- 3.10 Public participation exercises at the Preferred Options stage should not be seen purely as a means of generating formal submissions. A number of other benefits have arisen, including the following:-
- An increase in people joining the Council's Local Development Framework mailing list;
 - Raising awareness of the Local Development Framework and the changes the District will be facing. Although many members of the public appeared disappointed that the Core Strategy does not deal with detailed planning proposals it is hoped that the raising of issues at the

events will help to generate community involvement in subsequent Development Plan Documents which do address more specific aspects of planning policy; and

- Publicity around the Core Strategy consultation has encouraged hitherto unidentified community groups and mechanisms to make themselves known to the planning department and thus enable involvement in the production of future Development Plan Documents.

4 CONSULTATION RESULTS

- 4.1 The results gleaned from community involvement exercises build upon, and should be considered alongside, those obtained from public participation on the previous stage of the Core Strategy.
- 4.2 A total of 793 representations were submitted by 443 groups, organisations and members of the public. 151 (19%) were submitted to the Council directly through the new online consultation system; 186 (23.5%) via email; and 456 (57.5%) were paper representations.
- 4.3 Details of all representations received are available to view online via the Council's consultation system and in paper format available in the Member's Library in the Civic Suite.
- 4.4 In addition to the representations received a petition with 328 signatures was submitted at the Hullbridge public exhibition. The petition stated "Please all support your village, sign below if you are opposed to the amount of building houses/flats in our village. We need more shops for the village."
- 4.5 A statistical breakdown of representations received is attached to this report as Appendix 1.
- 4.6 The issue that by far and away elicited the most responses was that of the location and numbers of new housing. 459 representations related to this issue, 327 of which were objections, 114 comments and 18 in support. A large proportion of representations on this section were people objecting to addition development in their area of residence, the majority of which were objections to the allocation for Rayleigh, or respondents promoting development on particular sites.
- 4.7 A detailed analysis of the qualitative aspects of the consultation results together with Officer comments on these will be presented to Members at a future date.
- 4.8 Representations from both members of the public, statutory bodies and other organisations expressed concern regarding the lack of detail as to where new development will be located, the quality of the evidence base used to arrive at the preferred options, and the impact on infrastructure from new development.

- 4.9 When the drafting of the Core Strategy Preferred Options was originally undertaken, guidance inferred that the Core Strategy should not deal with specific development locations – this being left for the Allocations Development Plan Document – but should instead deal with broad issues and set out the Council's general approach to future development. However, responses from statutory consultees, including GO East, suggest that more detail is required at the Core Strategy Preferred Options stage than was provided in the Council's draft.
- 4.10 Comments from GO East suggest there is a high risk that if the Council were to proceed to Submission Stage from this Preferred Options draft the Core Strategy would ultimately be found unsound. In addition, a report published by the Planning Inspectorate in June 2007, explains the importance of ensuring that evidence is complete on the submission of the plan.
- 4.11 Public participation events have shown that there is clearly considerable public interest and concern regarding the future development of the District.
- 4.12 It is considered that a revision of the draft Core Strategy to include greater detail of development locations and empirical evidence to support the preferred options would not only enhance the prospects of the Core Strategy ultimately being found to be sound by the Planning Inspectorate, but it would allow the Council to take account of issues raised following community involvement, prior to moving to a submission version of the plan. The public and other stakeholders would then be consulted again on the revised Preferred Options draft, allowing more opportunity for public participation before submission. Although there is public participation at Submission Stage, opportunities for stakeholders to put forward alternatives are limited.
- 4.13 Since there will be a delay in the preparation of the submission version of the Core Strategy, it will be necessary to consider a revision to the Local Development Scheme (LDS) timetable; a report will be prepared for consideration at a future meeting of the sub-committee.

5 RISK IMPLICATIONS

- 5.1 If the Council were to proceed to Submission Stage without first going through the Preferred Options Stage again there would be a high probability that the Core Strategy would be found unsound by the Planning Inspectorate during the examination. The Council would subsequently be required to reproduce the Core Strategy, possibly having to recommence at the beginning of the entire process, with considerable resource implications. The adoption of the Core Strategy would then be put back a considerable amount of time. This would consequently cause a delay in the production and adoption of the other Development Plan Documents – such as Development Control Policies and Allocations – as these are required to conform to the Core Strategy. This would further delay the production of the Local Development Framework and may have implications on the awarding of Planning Delivery Grant to the

Council. In addition, it could also undermine the Council's control of development in the District. For example, by failing to be able to demonstrate an adequate housing supply to meet the requirements of the Regional Spatial Strategy, the Council may find it harder to successfully reject unwelcome, ad-hoc development proposals through the Development Control process.

- 5.2 Failure to revisit the Core Strategy Preferred Options stage would limit opportunities for effective public participation in the process and would be detrimental to community involvement in the planning of the District.
- 5.3 It must be noted that revisiting the Core Strategy Preferred Options will cause further delays to the Local Development Framework timetable, and may reduce the amount of Planning Delivery Grant awarded to the Council. Delays would not, however, be as significant as if the Council were to proceed to submission and then have the Core Strategy found to be unsound.

6 ENVIRONMENTAL IMPLICATIONS

- 6.1 The Core Strategy will have a significant impact on shaping the District's future environment.

7 RESOURCE IMPLICATIONS

- 7.1 The production of a revised Core Strategy Preferred Options document and subsequent community involvement exercises, will be largely undertaken by the Council's Planning Policy Team. However, resources will be required to prepare additional baseline reports, including a retail study, pitch/open space provision, and sustainability appraisal and environmental assessment of the revised document. The costs of this work can currently be met from Planning Delivery Grant.
- 7.2 The delay in producing the submission version of the Core Strategy requires a revision to the LDS timetable and this may impact on the award of Planning Delivery Grant.

8 RECOMMENDATION

- 8.1 It is proposed that the Sub-Committee **RECOMMENDS**

That a revised Core Strategy Preferred Options document be prepared, having regard to the results of recent community involvement, and an improved evidence base.

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Background Papers:-

Local Development Frameworks: Lessons Learnt Examining Development Plan Documents, The Planning Inspectorate, June 2007.

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