

## **Inspector's Guidance to the Council on work during the suspension of the Castle Point Core Strategy DPD**

In light of representations and following discussions during the hearing sessions conducted between 22<sup>nd</sup> June and 1<sup>st</sup> July 2010 I consider the Council should review some aspects of its Core Strategy (CS). This may require further evidence and/or a clearer justification of elements of the policy base. The main areas to address are:

1. The implications arising from revisions to PPS3, especially in terms of further land requirements and the need for any changes to the CS to enable delivery of the proposed housing by 2026. It would be sensible to make clear the Council's position with regard to housing numbers (e.g. are the original targets to remain and are these minimum/maximum numbers) in order to provide clarity on this matter now that the Regional Strategy (RS) has been revoked.
2. The need for a clearer explanation of the Council's approach to housing and employment land provision, including the distribution of growth between Canvey Island and the mainland. This should form part of the explanation to the spatial strategy.
3. The evidence to show that identified housing sites will come forward over the course of the plan period. It is important that the Council adopts a realistic stance on this, particularly for locations where the data is old but also where provision relies upon significant investment or where there are potential constraints which could undermine the speed or scale of delivery.
4. Its approach to employment so that it can demonstrate that the required number of jobs will come forward during the plan period in its preferred locations or that there is sufficient flexibility built into the CS to address any unforeseen failure in employment land supply.
5. That sufficient flexibility has been built into the CS generally so that adjustments can be made in subsequent Development Plan Documents (DPDs) should monitoring indicate there may be difficulties in delivering elements of the spatial strategy.
6. The importance of making clear its approach to the Green Belt (GB). This could be achieved through the inclusion of relevant policies in the CS. These may, if necessary, reflect any local emphasis on GB matters not covered by national guidance. The Council should also consider whether the spatial strategy would benefit from defining a sequential approach to development including the role of GB locations. This could identify 'safeguarded land' as a means of introducing the necessary flexibility into the CS to cope with changing circumstances.
7. How any matters relating to the GB, including the setting of detailed boundaries, the priority for the release of sites and the need for additional sites will be dealt with in subsequent DPDs. In this respect, The Council may wish to consider the balance between the strategic role of the CS and the more detailed aspects of implementation necessary in subsequent DPDS for Canvey Island and Benfleet, Hadleigh and Thundersley.

8. The relative weight given to different constraints. It may wish to review its approach on this to ensure it is consistent with the outcome of the Sustainability Appraisal (SA).
9. Its position and approach to the oil and gas installations on Canvey Island during the plan period. This should be realistic and acknowledge what scope there may be, if any, for change.
10. Other matters, such as those raised by Sport England, and how these can be addressed in a satisfactory manner.

A number of other points have been identified such as the need for cross-referencing and the incorporation of other information including a consistent approach to dates. These are not necessarily matters which affect the soundness of the CS but are points which the Council may wish to address in any further minor changes to the Plan.

It would be helpful if further information, such as the updated SFRA being carried out by Scott Wilson, is made available, if possible, to inform the Examination process. It will also be useful to know what approach the Council will now adopt on other matters affected by the demise of the RS, such as Gypsy and Traveller provision. Finally, the Council will also need to have regard to any other changes to the planning system which may be introduced by the Secretary of State.

### **Changes to the Core Strategy**

In undertaking this further work the Council should consider whether any changes it is likely to recommend will be significant and therefore need to be subject of further Sustainability Appraisal, Habitats Regulations Assessment work etc. It may consider the work undertaken to date remains valid but it should err on the side of caution in considering what it considers to be a 'significant change'.

Further consultation on changes to the CS will be undertaken after a procedural meeting takes place (currently intended to be held in the autumn). In preparing to undertake this work it should be made clear that representations are invited only on the proposed changes. Each change should be referenced and it should be clear what alterations are being proposed in terms of deletions and additions to the CS. Where the change affects the majority of a section or area of policy, the revision should be set out in full.

Any further minor modifications to the CS can be appended to the existing schedule by merely continuing the numbering sequence. A separate list of 'significant' changes should be prepared. It is advisable that the Council's consultation includes both minor and significant changes it is recommending to the CS.

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7 July 2010