

Summary Appraisal of Sustainable Housing Growth



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Summary Appraisal of Sustainable Housing Growth Potential

The need for housing - Strategic Housing Market Assessment (SHMA) Update

1. The National Planning Policy Framework (“the Framework”) sets out the national objective to significantly boost housing supply. Paragraph 159 identifies the scope of the necessary assessment, in terms of:
 - meeting household projections, which take account of migration and demographic change
 - addressing the need for all types of housing including affordable housing, and
 - catering for housing demand.

Given the central objective of achieving economic growth, paragraph 20 of the Framework expects that plans meet the development needs of business. Hence, a further test is taken to be the supply of housing needed to support the economic potential of an area.

2. The SHMA Update undertaken by specialist consultants in conjunction with officers of this Council and Hastings Borough Council (HBC) concludes:

Thus, the overall conclusion is that delivery of the new homes identified as being required in the Baseline Scenario is that which fulfils an expectation to meet all three dimensions of housing need.

3. The Baseline Scenario referred to is the most recent demographic projection using the DCLG’s April 2013 household projections and the most recent data from the 2011 Census.
4. Specifically, this gives a housing need for Rother of 6,178 new homes (363 new homes pa) over the period 2011-28. It also identifies a need for 6,863 new homes in Hastings (404 pa), giving a total across the ‘Housing Market Area’ of 13,041 new homes (767 pa).
5. In essence, this Council, as Local Planning Authority, should be aiming to provide for some 6,180 net additional dwellings over the Core Strategy period, although taking account of the (low level) completions 2011-2013, the residual requirement actually equates to 394 dwellings/year.
6. A further consideration is that HBC believes that it is unable to meet all its assessed housing needs in the Borough, essentially for physical capacity reasons. Based on its Proposed Modifications (currently out to consultation), for 3,400 dwellings, it would fall short by some 3,200 dwellings.
7. Therefore, if it is able to meet some of HBC’s unmet housing need, Rother should endeavour to do so, especially as it is in the same ‘Housing Market Area’. In fact, HBC has already asked if Rother could accommodate some or all of its current need. This has been considered but for reasons of Rother’s own environmental and infrastructure constraints (elaborated upon below) this is not considered possible.

8. Further consideration is given to how much of the identified housing needs can be met below. However, a relevant point arising from the SHMA Update is the qualifying statement to the above conclusion, namely that:

However, the level of housing associated with the Baseline Scenario would to a degree work against the economic objectives of the two Councils to reduce unemployment, increase labour force participation, and reduce net out-commuting; the implication being that a lower level housing could be more beneficial in this respect. A lower level of housing provision than implied by the demographically driven baseline scenario could also meet the requirement for affordable homes.

Land supply - Strategic Housing Land Availability Assessment Update

9. The Council previously, in 2010, prepared a Strategic Housing Land Availability Assessment (SHLAA) to demonstrate the deliverability of its housing strategy, to deliver both the quantum of proposed housing and the potential opportunities in each settlement that accorded with its spatial distribution strategy.
10. This has been updated and reviewed (see separate document at Appendix 3), with further testing of assessed sites as well as the evaluation of sites submitted subsequently. The approach has been to test the potential for development at the individual site level, without the limitation of any overall housing requirement.
11. This has yielded across-the-board increases in housing potentials relative to the scale of new allocations previously approved. On the basis of the capacities identified in the SHLAA at Appendix 3, there is the prospect that housing numbers could be increased as follows:

	Scale of new allocations approved by Council Jan. 2013	Revised SHLAA potential for new allocations June 2013 (rounded)
Bexhill	825	750-1,320
Hastings Fringes	54	50-200
Battle	82-122	165
Rye/Rye Harbour	0 (-55)	115
Rural Areas	439	800
Total	1,353	1,880-2,600

12. A critical qualification to this assessment is that, while it draws on relevant available information and, for the most part, draws on local knowledge of the Town and Parish Council representatives who have worked alongside officers in reviewing sites, is that all sites require further investigations, as well as input from other interested parties through consultation, before they can be confirmed as appropriate sites. Use of the SHLAA Update at this point is to demonstrate the deliverability of the proposed levels of housing growth.
13. The implications of the potential capacity of these sites upon total housing numbers in the SHLAA, taking into account completions 2011-13, outstanding commitments and relevant windfall allowances, relative to those approved by Council in January, are set out overleaf.

	Total dwellings - approved Jan. 2013	Total dwellings - Revised SHLAA (rounded)
Bexhill	2,700	3,330
Hastings Fringes	100	100-250*
Battle	410-450	500
Rye/Rye Harbour	260-360	400
Rural Areas	1,270	1,670
Total	4,810	6,000-6,150

* Range attributable to outstanding Natural England objection to Breadsell Farm (see Hastings Fringes section below)

14. It can be seen that if these capacities were achievable, having regard to other policies of the Framework, then the objectively assessed housing needs for Rother could, with only a very modest number of large site windfalls coming forward (see below), be met.
15. The most significant changes to the current development provisions would be:
 - An increase of up to 630 further homes in Bexhill over and above the increase to 4,700 dwellings approved in January 2013
 - A possible significant additional development on the edge of Hastings (at Breadsell Farm)
 - A relatively large amount of growth at Battle
 - Some new development potentials at Rye, although partly balanced by reduced expectations from existing allocations
 - A noticeable increase in house building in the Rural Areas, with virtually all identified villages having some further potential for growth

Windfall sites

16. Windfall allowances have also been reviewed. In relation to small windfall sites, the estimated rate is still considered reasonable. Some more sites may come forward as a result of recent Government measures to further stimulate home building, including changes in Permitted Development Rights, but these are likely to be balanced by the impact of lower economic forecasts.
17. There is a strong historic trend of large windfall sites. These have generally been excluded from calculations in plan making in recent years because of their unpredictability. Also, within settlements, the SHLAA process is assumed to find most reasonable opportunities. Indeed, the SHLAA includes not only sites that are considered developable, but also identifies 'broad locations', such as localities with properties in large plots capable of intensification, and central locations with the prospect of housing in a redevelopment scheme.
18. Some smaller, individual sites will inevitably be not factored in, even though policies would allow for them. A further potential is that of community-led development proposals in smaller villages and hamlets, etc. These are discussed more in the Countryside section below.

19. While there is no evident robust basis for such an allowance, this supports the flexibility, reflected in some recent Local Plans, that the dwelling target should be qualified by ‘*at least*’.

Sustainable development appraisal

20. The sites-based approach to identifying development potential needs to be reviewed in relation to the cumulative implications for the settlement, and the District as a whole, on a number of factors critical to achieving sustainable development, notably:

	NPPF references
Compatibility with the Vision and Strategic Objectives	Realising a community's positive vision for the future of their local area is a core planning principle. (paragraph 17)
Accordance with the Settlement Pattern and Strategy	Need to take account of roles and characters of areas, promoting vitality of main urban areas, encouraging effective use of brownfield land, accessible locations, including villages with services (paragraphs 17, 55 ,38)
Protection of International Nature Conservation Sites	These enjoy strong protection by European Conventions. Adverse impacts have to be justified in the national interest (paragraphs 14,113, 117, 118)
Conservation of the landscape and scenic beauty of the AONB	AONBs (and National Parks) have the highest status of protection in relation to landscape and scenic beauty, to which great weight should be given. (paragraph 14,115, 116)
Capacity of Critical Infrastructure - Transport	Reduce the need for travel, give choice as to mode ensure provision of viable infrastructure, access whether improvements to the network can limit significant development impacts (paragraph 29, 31, 32)
Capacity of Critical Infrastructure - Water supply	Take full account of water supply, as well as flood risk and coastal change (paragraphs 94, 99, 156 and 162)
Deliverability	Local Plans should be aspiration but realistic (paragraph 154)

21. While these factors apply to some degree across different geographies, for simplicity, protection of international nature conservation sites, conservation of the AONB and capacity water supply infrastructure are considered on a District-wide basis, while accordance with the settlement pattern/strategy, transport capacity and deliverability are presented as settlement/area factors. Compatibility with the vision is considered under both headings.

District-wide sustainability factors

22. Vision and Strategic Objectives: The Core Strategy's vision has been developed with the Local Strategic Partnership and is regarded as fairly reflecting the priorities of local people and businesses.

23. Main points arising from an appraisal of further growth against the Vision are:
- a) Further housing may assist in developing 'balanced communities' if it further encourages younger people to live locally;
 - b) While housing can assist the key objective of economic growth, the Assessment of Housing Needs notes that a lower level of housing would actually provide greater opportunities for the local workforce to be employed, increased economic activity and working locally;
 - c) Further housing would more readily meet the need for affordable housing for local people although, again, a somewhat lesser level should also achieve this;
 - d) There are increasing incompatibilities of higher housing numbers with conservation of the area's outstanding environmental assets (see below).
24. International nature conservation sites: These are the Dungeness and Rye Bay "complex" of designations and the Pevensy Levels. The Appropriate Assessment under the Habitats Regulations carried out for the submitted Core Strategy did not raise serious issues of adverse impacts, except for the potential of the combined impacts of further development and tourism at the south-eastern parts of the District. Initial advice from the Council's environmental consultants is that the more limited increase in housing in the Rye area should not be inconsistent with the wildlife interest of the Rye Bay area. The sustainable access strategy, previously highlighted to manage access to the international sites, is still important. In fact, this is currently being progressed with Shepway District Council.
25. Significant growth on the western and northern fringes of Bexhill was previously tested, so no material additional impacts are envisaged.
26. High Weald Area of Outstanding Natural Beauty: There is a statutory obligation to have regard to the conservation of the High Weald AONB; the 'great weight' to be given to this in national policy reflects this duty.
27. In terms of the overall scale of housing, it is notable that the scale of housing now proposed in the inland parts of the District is higher than that deemed appropriate by the Panel examining the South East Plan.
28. It is very difficult to prescribe a "carrying capacity" of the landscape. Rather, in undertaking the review of development potential in the AONB, and following discussion with AONB officers, use has been made of data identifying key landscape features as well as information about the historical development, and typology, of settlements. These have complemented the area-based landscape assessments (previously carried out by the County Council's Landscape Group) and site surveys.
29. As may be implied from the additional development potential identified in the SHLAA Update, there will inevitably be some sites where (subject to further investigation) development may cause a degree of harm to the AONB setting of settlements, but not such harm as to prevent them being considered in order to help towards boosting the supply of housing.

30. Nevertheless, the cumulative implications of further activity, and populace, in the AONB will impact on its character. To mitigate these, maintaining the settlement pattern, the character of settlements and the tranquility of more remote locations have all been considered.
31. Water supply: Water in Rother is supplied by two companies - Southern Water and South East Water. Their plans to ensure that there is a sufficient supply of water to meet the anticipated demands are set out in their respective Water Resources Management Plans.
32. Both companies have recently published Draft Plans for consultation covering the period to 2039/40. These will be reported to Cabinet later this month.
33. At this point, it is noted that underpinning both draft Water Management Plans is demand forecasting. Future forecast of population and property numbers have been provided by expert demographic consultants, Experian, based on a combination of current policy and trend-base projections. Initial investigation is that these assume increases of a little over 8,000 more dwellings in the Rother/Hastings area up to 2030.
34. This is marginally less than the housing growth now being proposed by the two Councils. While this situation needs to be drawn to the attention of the water companies through the consultation process, to ensure that housing targets can be accommodated, both South East Water and Southern Water have advised that they are in the process of updating their figures to reflect the results of the 2011 Census.

Local area sustainability factors

35. Bexhill: The town is already identified as being the strong focus of development. It should benefit from enhanced facilities and services which would result from further development. Maintaining and improving the balance between homes and jobs is important in order to meet the objective of fostering a more balanced demographic profile. Further housing, as identified in the SHLAA, (of up to 3,330 additional homes) would be expected to facilitate additional employment land releases, although the economy is unlikely to grow to a sufficient extent to provide a high level of employment.
36. Aside from the local view, (expressed in the early residents' questionnaire) that growth of the town should not be too great as to change its character, particular factors exist that constrain growth in relation to the capacity of the transport network and the deliverability of development.
37. A supplementary report to the SHMA Update prepared by the Council's housing consultants looks at potential 'Housing Delivery in Bexhill and Hastings' (see separate document as Appendix 4). This concludes that:

'There are also concerns about the overall capacity of the Bexhill market to absorb new homes. A number of benchmarks would indicate that it will be challenging to consistently deliver more than 200 homes pa, year in year out, both because of market capacity; and the potential impact on sales values of new homes, if the market is relatively oversupplied – since this will act as a deterrent to high volumes of new building.'

38. On this basis 200 dwellings pa over the remaining 15 years of the plan period, added to those built in 2011-13, would give a total approaching 3,100 homes, 235 dwellings less than the full SHLAA capacity.
39. The 2,700 dwellings previously accepted would involve building 175 dwellings pa. While this may be seen against a rate of 130 dwellings pa from 2001-07, when economic conditions were clearly more advantageous, the consultants' point that the town did not then have the same major land releases is accepted.
40. The other strategic constraint to growth is the capacity of the transport network. While the construction of the Link Road obviates the need for a "non-Link Road" scenario (currently provided by Policy OSS2), there remain real limitations to further growth, not least as it does not reduce flows on the A259 east of the town centre, while already planned development may not leave much capacity for further flows on local roads in the area.
41. Traffic modelling has been commissioned. It looks at the potential for 2,800 dwellings (essentially as previously considered, but with a small increase to reflect higher brownfield capacity), 3,100 dwellings (the market potential), and 3,400 dwellings (to accommodate the SHLAA potential).
42. The results, together with the comments of the County Council, as highway authority, are awaited. They should be available for Cabinet to consider.
43. Hastings Fringes: A review of the existing evidence base of development potential on the fringes of Hastings in Rother district has essentially confirmed the current position of this and Hastings Borough Council. The only real potential for the outward growth of Hastings that would not have direct and substantial impact on the High Weald AONB setting of the town is the Breadsell Farm area on the south side of Battle Road.
44. This site, which straddles the administrative boundary, mainly in Hastings but with a road frontage in Rother, has been the subject of close scrutiny through the Hastings Planning Strategy Examination. The Borough Council's position is that it is not allocated for development because of unresolved objections by Natural England regarding its impact on the Marline Valley SSSI. The Inspector has not indicated that the Planning Strategy be modified in the light of evidence presented at the Examination. The implication is that he is satisfied that there is not sufficient confidence to justify its inclusion in the Hastings Planning Strategy at this time.
45. Notwithstanding this position, the construction of the Hastings plan would not rule out a development proposal should Natural England's objections be overcome and it be satisfactorily demonstrated that the local highway network could cope (which is likely to require Baldslow improvements in place).
46. For both Hastings and Rother, because this could represent a rare opportunity for sustainable development (if planned comprehensively) outside the AONB, it is considered appropriate to not rule it out; hence, the range in the SHLAA. The overall potential would be of the order of 750 dwellings (with other uses), of which some 150 dwellings could be in Rother.
47. Addressing these twin constraints is likely to mean that, if development can come forward, it would not be in the first 10 years of the plan period.

48. Rye: The strategic objective for Rye emphasises its economic and social well-being within a context of managing its historic character, vulnerability to flooding and internationally important ecological setting. Together, these considerations weigh heavily against significant new development.
49. The SHLAA Update partly reflects these limitations to opportunities for significant outward growth. Of particular note, evidence presented to the Examination indicated that the prospect of relocation by the main business occupiers to enable residential-led redevelopment at Rock Channel (as provided for by the adopted Local Plan) is unlikely. The area is still retained as a 'broad location' in the SHLAA, to maintain the option, but the likely housing yield is much reduced; it may well be nothing. Balancing this, is the identification of other potential opportunities for housing through redevelopment schemes. Further work is required, through the development of the proposed Neighbourhood Plan for Rye, to further investigate such possibilities.
50. It is reasonable to maintain a range of housing growth for the town, as it is clear that if redevelopment opportunities (on which a higher level of growth is based) do not all come forward, there is little or no potential for alternative sustainable outward growth. The range allows for a proportion of redevelopment capacity not being realised.
51. Battle: In terms of the overall vision, the key issue is the ability for the town to grow while at the same time retaining its historic character and setting. There is no doubt that this imposes limits to growth, but the SHLAA has revealed that there are sites across the town the development of which, while having some local impact on the AONB setting, could be developed (subject to further assessment) in line with the development strategy for the Town to distribute development, not least to balance transport movements.
52. An overall housing growth of 400-440 dwellings was included in the submitted Core Strategy, increased by just 10 dwellings (i.e. 410-450) to help meet the South East Plan target. An increase of up to 500 dwellings would represent a significant increase in the housing stock (17% in Battle Parish), even though it is only a 11% increase on what has been accepted.
53. While Battle has a relatively buoyant market, this is considered the limit of sustainable growth. Apart from AONB impacts, there are infrastructure issues that require further attention, notably in relation to education and traffic capacity around this scale of development. These will require further investigation, although they are not believed to be "showstoppers". Also, as the capacity includes some 'broad locations' where the prospects of development are currently uncertain, it is appropriate to allow for some not coming forward. This is done, as for Rye, by adopting a range that reflects this prospect.
54. Villages: The key test for growth in the villages is whether it reflects the vision to retain their distinctive, individual character and qualities, as well as support local services and community "life".
55. Officers have had further discussions with Parish Council representatives to positively pursue the scope for additional land releases. This has produced tentative capacity for nearly 400 additional homes in the villages, a 50% increase in the amount of new allocations, and a 26% increase in total housing relative to the 1,270 dwellings figure agreed by Council in January.

56. Every effort has been made to ensure that the increases represent a manageable level of growth in terms of absorption into the settlement, socially and physically, as well as in terms of local infrastructure. The scale of growth is still broadly proportional to settlement size and services.
57. In particular, impacts on the AONB, where applicable, have been carefully considered, as set out above in relation to the cumulative impacts. At the settlement level, inevitably, there will still be some adverse AONB impacts, if only by the loss of open fields. Detailed proposals will be required to not only mitigate these impacts but, where practicable, to incorporate measures to enhance key characteristics of the AONB.
58. Countryside: No specific changes are proposed in respect of the countryside. It will remain strongly protected by the proposed modifications, with net increases in housing only being allowed where there is a strong justification.
59. Consideration has been given to whether the Core Strategy should make further allowance for limited housing schemes coming forward in smaller villages and hamlets not currently identified for growth. For example, individual communities may identify an acceptable development opportunity that will enable some locally important benefits (such as affordable housing for local people or improved community facilities).
60. While not wanting to rule this out – it could be compatible with the historically dispersed settlement pattern of the High Weald - there is little evidence of such schemes. Previous small schemes have been at Pestalozzi (to enable investment in the International Village) and at Pett (redevelopment of a garage site). However, it does lend weight to the potential for more windfall sites.

Conclusions

61. In the light of all the further analysis to date, and subject to outstanding work (elaborated upon below), it is recommended that the housing numbers for each of the spatial areas be modified as follows:

	Total dwellings - approved Jan. 2013	Total dwellings - Revised SHLAA	Proposed housing levels 2011-2028
Bexhill	2,700	3,330	3,100
Hastings Fringes	100	100-250*	100-250
Battle	410-450	500	475-500
Rye/Rye Harbour	260-360	400	355-400
Rural Areas*	1,270	1,670	1,670**
Total	4,810	6,000-6,150	At least 5,700 (5,700-5,920)

* Subject to the outcome of ongoing transport study

** The indicative distribution between villages is indicated in Appendix 5.

62. As can be seen, housing targets are increased degrees across the district. The overall provision would be 1,000 dwellings more than previously agreed and as provided by the South East Plan. Moreover, it represents a significant boost to housing supply, the annual average rate 2011-28 being 335 dwellings pa compared to 235 pa over the last 22 years (i.e. an increase of 43%).

63. As regards Bexhill, the target reflecting market potential is taken, although it is stressed that this is subject to further weighing of the transport study findings, against the housing need, the vision for the town and its economic and housing market context.
64. It is not considered appropriate to build the higher figures for the Hastings Fringes, Battle and Rye into the base target for the reasons explained above and, in the case of the Hastings Fringes higher figure, as accepted through the Hastings Planning Strategy Examination.
65. While the housing target for the Rural Areas is a 30% increase on that previously approved, there is market potential for this. As Appendix 5 shows, the growth is spread across a good number of villages. It should also be stressed that these are indicative numbers for each village to be further tested through the respective site allocations or neighbourhood planning processes. These will also further investigate the most suitable locations for growth, and scales and forms of development.
66. Central to these conclusions is the acceptance of the weight that the Government is giving to boosting house building as part of its economic strategy. Accordingly, these recommendations duly give more weight than has previously been the case. Were it not for this housing need, the previously approved levels of growth were, and are, regarded as consistent with the local visions set out in the Strategy. Housing need is a legitimate and genuine need though, warranting due consideration.
67. The minimum recommended housing target still falls a little (7.8%) short of the objectively assessed housing needs for the district of 6,180 dwellings 2011-2028 (subject to the final Bexhill figure). At the upper end (5,920 dwellings), the gap is less than 5%, which would be bridged with some 260 dwellings on large windfall sites over the next 15 years.
68. Even so, it has to be acknowledged that the housing provisions in Hastings and Rother taken together of at least 9,300 ($\geq 3,400 + \geq 5,700$) would still fall below the combined housing needs across the Housing Market Area, of 13,041 dwellings. Four key points may be made in relation to this shortfall:
- i. The actual planned housing provisions of the combined areas are consistent with the economic-led housing target of 9,250 dwellings (paragraph 2.4.27 of Appendix 2)
 - ii. The actual planned housing provisions of the combined areas are consistent with the local housing needs based assessment of 8,848 dwellings; (paragraphs 2.3.26 and 2.3.27 of Appendix 2)
 - iii. The shortfall is essentially that in Hastings. It is doubtful that the flow of in-migrants to Hastings would look to Rother as the main alternative. It seems more likely that many would move to other towns in the region with low housing costs and/or job opportunities, such as the Kent coastal towns or Ashford;
 - iv. It is evident that Hastings has, physically, no additional land (except for the possible potential of Breadsell Farm) to accommodate more housing which would allow it to maintain the past trend of relatively high net in-migration, while Rother is constrained in ways recognised by the Framework as justifying not meeting trend-based housing needs and demand in full.

Consequential impacts on the Local Plan Core Strategy

Business and retail needs

69. Amended housing numbers may impact on other facets of the Core Strategy, notably employment land and retail provision. As regards employment land, the implications are likely to be modest, as provision is already made for as much new business floorspace as is likely to be capable of being needed to meet the economic potential of the area over the plan period.
70. Significant further employment land allocations are unlikely to be taken up, although further housing does place added emphasis on securing mixed use developments wherever practicable to assist in maintaining the balance between homes and jobs.
71. As regards retail floorspace, the significant increase in urban growth (in both absolute and percentage terms) is at Bexhill. This is the subject of a further retail assessment. Revised retail floorspace requirements will need to be incorporated into the Strategy, although these are not expected to be so great due to the impact of the recession on spending forecasts.

Housing land supply

72. Local Plans are expected to demonstrate at least a 5-year supply of deliverable sites and a 10-year supply of developable sites. Recognising that the Core Strategy is effectively “Part 1” of the Local Plan, with site allocations to be set out in “Part 2”, it should still provide a policy basis to maintain these targets.
73. A review of housing land supply as at 1st April 2013 has recently been completed for the annual Monitoring Report. This shows a 5-year supply of 1,558 dwellings. This must be compared to a requirement if the housing target was 5,700 dwellings of 1,898 dwellings¹. This yields a shortfall of 340 dwellings, which has Development Management implications.
74. Pending achieving the 5-year target through further permissions, the SHLAA provides a basis for meeting this shortfall. (As an aside, this illustrates the implications of a challenging housing land target in an economic recession. If completions over the last two years had been on target, the 5-year requirement would be some 1,760 dwellings; that is, a 200 rather 340 dwellings shortfall.)
75. Similarly, the SHLAA (see Appendix 3) provides a sound basis, pending site allocations work, to show that there are potential sites to meet a 10-years’ supply of developable sites. The SHLAA identifies a potential supply (from current commitments, small windfall sites in years 5-10, and potential new allocations (i.e. excluding ‘broad locations’) of some over 4,500 dwellings. This would readily meet the 10-years supply target of 3,796 dwellings² even allowing for the fact that not all SLHAA sites come forward within this period.

¹ 5,700 (2011-28) – 275 (homes built 2011-13)/15 years x 5 years x 1.05 (a 5% buffer)

² Two times the above 5-year supply target of 1,898 dwellings=3,796 dwellings

Further work

76. Subject to Cabinet and Council consideration of the housing targets set out in this report, officers will complete the work outlined above, together with a further Sustainability Appraisal, in order to present the Inspector with Revised Proposed Modifications to the Local Plan Core Strategy (which will also incorporate other modifications agreed by council in January).
77. There will be the opportunity for local residents and other stakeholders to make representations on the proposed modifications to the Core Strategy and for any such representations to be considered by the Inspector.