



**Rochford District  
Council**

<b>REPORT TITLE:</b>	<b>New Local Plan Position Statement – March 2024</b>
<b>REPORT OF:</b>	<b>Director of Place</b>

## **REPORT SUMMARY**

The purpose of this report is to provide a summary on progress in developing the New Local Plan to date, and current and planned activity.

## **RECOMMENDATIONS**

R1. That the Planning Policy Committee notes the New Local Plan Position Statement

## **SUPPORTING INFORMATION**

### **1.0 REASONS FOR RECOMMENDATIONS**

1.1 This position statement has been prepared to inform Members of progress made on the Local Plan to date and outline key considerations.

### **2.0 OTHER OPTIONS CONSIDERED**

2.1 There are no formal decisions attached to this statement and no reasonable alternative options.

### **3.0 BACKGROUND INFORMATION**

3.1 The Council took a decision to review its Local Development Framework in 2015. This review has taken the form of developing a new Local Plan for the District.

3.2 Unlike the Local Development Framework, which consists of a suite of documents setting out planning policies (including the Core Strategy and Development Management Plan), the New Local Plan will comprise a single document which sets the overall planning strategy for Rochford District, alongside the detailed planning policies that applications must be determined against.

- 3.3 The New Local Plan is being developed over a period to 2040. It will need to set a positive and deliverable strategy for addressing development needs (including for housing, jobs and infrastructure) over that period, and make appropriate provisions for safeguarding, enhancing and managing the District’s built, historic and natural environments.
- 3.4 Since 2015, the Council has taken a number of substantial steps in delivering a new Local Plan, including:
- Undertaking an informal public engagement exercise in 2016, focused around parish-level engagement on key issues and opportunities affecting communities
  - Issuing two ‘Call for Sites’ processes between 2015 and 2018, to allow landowners, developers and other parties to put forward land that they consider suitable for future development.
  - Undertaking the “Issues and Options” consultation in 2017-18, which set out the challenges and opportunities facing the future of the District, and detailed options for future planning policies
  - Undertaking the “Spatial Options” consultation in 2021, which set out geographic (or spatial) options for how future development needs could be met, and revisited high-level options for the direction of future planning policies.
- 3.5 Development of the New Local Plan has been supported by a complete refresh of the previous Local Plan evidence base. A large number of technical studies and assessments have been prepared which, taken as a whole, will support decisions on planning strategy and policy matters. A summary of the evidence base completed to date, grouped by theme, is listed in Table 1 overleaf.

Table 1: Summary of ‘Completed’ Local Plan Evidence Base

<b>Title</b>	<b>Broad Purpose</b>
<b>Development Needs Assessments</b>	
<b>South Essex Strategic Housing Market Assessment (2016); Addendum (2017); and South Essex Housing Needs Assessment (2022)</b>	To assess the future need for different forms of housing
<b>South Essex Economic Development Needs Assessment (2017); Economic Development Needs Assessment Update (2023)</b>	To assess the future need for employment and commercial floorspace
<b>South Essex Retail Study (2017); Retail and Leisure Needs Assessment Update (2023)</b>	To assess the future need for retail and leisure floorspace
<b>Gypsy and Traveller Accommodation Assessment (2017) and South Essex Update (2019)</b>	To assess the future need for Gypsy and Traveller pitches
<b>Constraints and Opportunities Assessments</b>	
<b>3G Pitch Feasibility Study (2021)</b>	To assess opportunities to deliver 3G pitches in Rochford District
<b>Employment Land Study (2024)</b>	To assess state of District’s range of current and prospective employment sites and consider their role in addressing future employment need
<b>Green Belt Study (2019)</b>	To assess the relative value of different parts of Rochford’s Green Belt
<b>Housing and Economic Land Availability Assessment (2017) and Update (2021)</b>	To assess the availability and suitability of land in Rochford District for future housing and employment development
<b>Initial Heritage Assessment (2021)</b>	To assess the relative impact development of sites promoted in the New Local Plan would have on local heritage assets
<b>Initial Transport Analysis (2016-2021)</b>	To consider the constraints of the local highway network and the relative impact of future growth on the network
<b>Landscape Character, Sensitivity and Capacity Study (2019)</b>	To assess the relative value of different landscapes in Rochford District
<b>Level 1 Strategic Flood Risk Assessment (2017)</b>	To assess relative flood risk across Rochford District from different sources
<b>Local Wildlife Sites Review (2018)</b>	To review the District’s network of local wildlife sites to ensure they remained worthy of formal designation, and to identify any undesignated sites worthy of a new designation
<b>Playing Pitch Strategy (2018) and Built Facility Strategy (2018)</b>	To assess the capacity of local playing pitches and leisure facilities to meet long-term demand and identify opportunities for improvements
<b>Settlement Role and Hierarchy Study (2021)</b>	To assess the relative role and access to facilities within each of the District’s settlements
<b>Site Appraisal Paper (2021)</b>	To undertake a detailed multi-criteria assessment of areas of land in Rochford District for future housing and employment development
<b>South Essex Green and Blue Infrastructure Study (2020)</b>	To identify opportunities to improve and enhance green and blue infrastructure (e.g. parks, coastal areas)
<b>South Essex Strategic Infrastructure Position Statement (2019)</b>	To assess baseline capacity and issues affecting infrastructure across South Essex
<b>Urban Capacity Study (2021)</b>	To assess the potential capacity of urban land for housing

3.6 The above list is not exhaustive, and it is recognised that a wide range of other evidence is available to inform the New Local Plan. It also does not include topic papers prepared at the time of Local Plan consultations, which generally look to

consolidate and compare the various sources of evidence available on relevant themes.

**Further Development of the Evidence Base**

3.7 In addition to the range of evidence base studies already complete, a number of new evidence base studies are substantially completed, awaiting presentation to the Committee, under preparation, or planned for the future.

3.8 A summary of the status of this future evidence base is summarised in Table 2 below.

Table 2: Summary of Planned Local Plan Evidence Base

<b>Title</b>	<b>Broad Purpose</b>	<b>Status</b>
<b>Development Needs Assessments</b>		
<b>Gypsy and Traveller Accommodation Assessment Update</b>	To assess the future need for Gypsy and Traveller pitches	Draft report due April 2024
<b>Constraints and Opportunities Assessments</b>		
<b>Town Centre Healthchecks Topic Paper</b>	To consider the role and purpose that the town centres are playing and explore the policies that may be required to preserve their role in the long-term	Complete – to be presented March 2024 Committee
<b>Commercial Property Market Review</b>	To provide a detailed review of the current supply of employment floorspace stock and land within the District, considering market conditions.	Complete – to be presented March 2024 Committee
<b>Open Space Study</b>	To objectively assess the quality and quantity of open spaces across the District	Complete but with updates to be made – late March 2024
<b>Local Cycling and Walking Infrastructure Plan (LCWIP)</b>	To assess the baseline quality of the District's walking and cycling network and identify opportunities for improvement	Underway, draft first stage report to be completed March 2024
<b>Site Selection Assessment</b>	To justify the selection of particular sites as proposed allocations for their planning reasons	Planned, initial draft to be presented late April 2024
<b>Local Plan Transport Assessment</b>	To review the impact of potential growth on the District's transport network, and assess the adequacy of potential mitigation to manage those impacts	Underway, first stage draft report due to be completed in May 2024
<b>Infrastructure Delivery Plan</b>	To understand the baseline infrastructure capacity within the District, review the impact of potential growth on local infrastructure, and assess the adequacy of potential mitigation on those impacts	Underway, first stage draft report due to be completed in May 2024
<b>Whole Plan Viability Assessment</b>	To review the impact of proposed policies on the overall viability of developing in the District	Underway, first stage draft report due to be completed in May 2024
<b>Local Wildlife Sites Review</b>	High-level refresh of the 2018 Local Wildlife Sites Review to ensure outcomes remain reliable	Planned commencement Summer 2024
<b>Detailed Heritage Assessment</b>	To assess the impact of the Plan's policies and strategy on protected heritage assets	Planned for Q4 2024
<b>Level 2 Strategic Flood Risk Assessment</b>	To assess the specific flood risk of proposed allocations within the Local Plan	Planned for Q4 2024 (post-Preferred Options)

**Key Considerations and Guiding Principles**

- 3.9 Progress of the New Local Plan to adoption is considered to have three substantive steps remaining:
- A consultation on a Preferred Options draft of the New Local Plan, setting out what the Council intends to include in its New Local Plan and why alternatives have been discounted (Regulation 18 stage)
  - A consultation on the final Local Plan that the Council intends to submit to the Government Inspector (Regulation 19 stage)
  - Examination in Public on the submitted Local Plan whereby a Government Inspector will test the Local Plan for soundness and legal compliance
- 3.10 A revised Local Development Scheme (LDS) was adopted at Full Council on 13<sup>th</sup> February 2024. This provides an updated timeline for the preparation of the emerging Local Plan, envisaging a Preferred Options consultation in Q3 (late Summer/early Autumn) 2024 and submission of a final Local Plan document to a Government Inspector for examination by the deadline of 30<sup>th</sup> June 2025 for consideration.
- 3.11 There are two key components to the New Local Plan that together make up the key elements of the remaining process. These are the ‘strategy’ element and the ‘policy’ element. In short, the New Local Plan will need to set a positive planning strategy for the District, underpinned by a vision, objectives and a spatial strategy (which defines areas of growth and/or protection). It will also need to set out a range of detailed planning policies that set rules that development must follow.

Latest Position on Strategy Matters

- 3.12 For context, the Spatial Options consultation held in 2021 was the Council’s last formal consultation stage on its New Local Plan. It included the following overarching vision:
- “Rochford District will be a green and pleasant place with a focus on business and high quality homes supported by accessible and responsive services and facilities, creating healthy and sustainable communities”*
- 3.13 This vision was supported by five strategic priorities, which together covered 23 strategic objectives. The five strategic priorities were:
- Strategic Priority 1: Meeting the need for homes and jobs in the area.
  - Strategic Priority 2: Making suitable and sufficient provision for retail, leisure and other commercial development.
  - Strategic Priority 3: Making suitable and sufficient provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)
  - Strategic Priority 4: Making suitable and sufficient provision of health, security, community and cultural infrastructure and other local facilities.
  - Strategic Priority 5: Making suitable and sufficient provision for climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

- 3.14 National planning policy requires Local Plans to meet the objective development needs of an area unless doing so would conflict with the need to protect areas of particular importance or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- 3.15 The Government has a standard method for calculating the number of homes needed in an area. The method calculates an annual need of 359 homes per year in Rochford District. This equates to a need for around 6,400 additional homes between 2023 and 2040, including an additional 5% 'buffer' to account for problems with some sites coming forward. Whilst use of this method is not mandatory, use of an alternative method requires exceptional justification.
- 3.16 The Council's emerging evidence estimates that by 2040, there will also be a need for:
- A minimum of 9-10 hectares of additional employment space (dependent on the level of assumed population growth and strategic economic aims)
  - 9,700– 12,500m<sup>2</sup> of additional retail, leisure and hospitality floorspace (dependent on the level of assumed population growth)
- 3.17 These need figures do not, however, account for existing planned supply. The current housing trajectory identifies a supply of around 2,650 homes on sites that either already have planning permission or are allocated for housing in the current development plan. Together with an assumed level of 'windfall' development from planning applications not anticipated in the plan, housing supply to 2040 is likely to be around 3,300.
- 3.18 Likewise, the District has an existing pipeline of employment space, supported by developments such as Airport Business Park and Arterial Park. In headline terms, these developments are likely to be large enough to meet most of the District's long-term employment needs. However, the 2024 Employment Land Study has indicated that it is prudent to plan for a minimum of 9-10ha of additional space to account for potential losses of employment space to other means during the Plan period, to provide additional types of accommodation deemed to be in short supply, and to ensure new and existing communities have employment opportunities located conveniently for access.
- 3.19 In this context, the New Local Plan will need to set a strategy that balances opportunities to meet any unmet or additional long-term development needs, with enhancing the natural and built environments, and delivering infrastructure.
- 3.20 The previous Spatial Options consultation identified four broad strategy options for the New Local Plan, with some options having sub-options. These are listed below:
- Strategy Option 1: Urban Intensification
  - Strategy Option 2: Urban Extensions (sites smaller than 1,500 homes)
    - » Option 2a: Focused on main towns
    - » Option 2b: Dispersed to all settlements based on Settlement Hierarchy
  - Strategy Option 3: Concentrated growth (c.1,500+ homes in one location)
    - » Option 3a: Focused west of Rayleigh
    - » Option 3b: Focused north of Southend

- » Option 3c: Focused east of Rochford
  - Strategy Option 4: Balanced Combination
- 3.21 Building on the feedback from the 2021 Spatial Options consultation, the [Feedback Report](#) for which was formally presented to the Committee in July 2023, the subsequent months since have seen a series of Member workshops held to consider a process for site sifting, in order to package up a series of focused and realistic scenarios to input into testing in the technical evidence base. This enables the 300+ sites which have been submitted for consideration for the new Local Plan to be reduced to a more manageable list of realistic options. The sifting principles are summarised as follows:
1. Sites sifted if wholly or mostly within Flood Zone 2 or 3
  3. Sites sifted if within, or within 200m of, a protected habitat site<sup>1</sup>
  4. Sites sifted if wholly or mostly within an area identified for special landscape quality.
  4. Sites sifted if beyond 800m of a bus route served by a frequent or semi-frequent service, unless of a size likely to be served by a new bus service.
  5. Sites sifted if not located within or adjacent to a Tier 1 or 2 settlement, <sup>2</sup>unless identified as an option for a new neighbourhood.
  6. Sites sifted if smaller than 0.5 hectares (notionally the bottom limit for affordable housing)
- 3.22 Based on these principles, a sizeable number of the 300+ sites being promoted for inclusion in the new Local Plan can be removed and a series of strategy options for testing devised. These represent evolutions of the broad spatial strategy options set out in the 2021 Spatial Options consultation, based on a series of principles including prioritising: brownfield sites; sites capable of delivering brand new infrastructure; sites in areas with existing infrastructure capacity; those which are less harmful to the Green Belt, landscapes or heritage assets; sites of lower agricultural grades; and sites within walking distance of services and amenities.
- 3.23 Work on developing these is currently underway, ahead of testing these options through the emerging technical evidence base, most notably the model being developed by our Transport Assessment consultants, Systra, and against the feedback being provided by various infrastructure and service providers for consideration in the emerging Infrastructure Delivery Plan.
- 3.24 The outputs of the first stage of this technical evidence base will be reported to Committee in accordance with the timescales set out in Table 2 . Members will then be able to consider the findings and respective strengths and weaknesses of different strategies, as well as the merits of individual sites. This will help guide the Council towards selecting either a single identified strategy, or a significantly focused number

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<sup>1</sup> i.e. Sites of Special Scientific Importance (SSSIs); Special Protection Areas; Special Protection Areas; Ramsar Sites and other internationally-designated sites, as per <https://www.gov.uk/check-your-business-protected-area#:~:text=Nature%20sites%20and%20areas%20of,have%20clear%20boundaries>

<sup>2</sup> Tier 1 and 2 settlements are: Rayleigh, Hockley/Hawkwell, Rochford/Ashingdon, Great Wakering, Hullbridge and Canewdon

of strategies, for public consultation in the Preferred Options stage, scheduled for Summer/Autumn 2024.

Latest Position on Policy Matters

- 3.25 Alongside strategy matters, work has also been progressed on developing the detailed planning policies that future planning applications must be assessed against.
- 3.26 Whilst a majority of the Council's existing policies remain broadly appropriate, it is clear that some policies have become out of sync with national policy or do not go far enough in achieving our objectives. Examples of areas where policies will need to be expanded include:
- More ambitious climate change policies, including improving building standards toward a carbon net zero standard<sup>3</sup>
  - More ambitious environmental policies, including reflecting mandatory Biodiversity Net Gain
  - Clearer expectations around high quality design, including greater use of design codes and masterplans.
- 3.27 Some initial proposed draft policies (the non-strategic policies focused on development management) were shared with the Planning Policy Committee in a workshop in October 2023 for comment. Further feedback has been received from colleagues in the Development Management team and from infrastructure/service leads at Essex County Council.
- 3.28 Additional work will be undertaken by the Strategic Planning team to refine the draft policies over Spring 2024, with output from the technical evidence base and eventual identification of a single or very small number of spatial strategy options (including sites) enabling the drafting of strategic policies which set out the Council's expectations for how identified areas will contribute the District's needs in aspects such as housing, employment, infrastructure, transport, environment and biodiversity, retail and town centres, and many more.
- 3.29 The full set of draft policies will be presented to a future committee and subsequently submitted for public consultation as part of the Preferred Options paper.

**National Policy Changes**

- 3.30 As has been set out in previous Member briefings, the Government has consulted on a range of potential changes to the planning system. It is looking to introduce significant changes through the Levelling Up and Regeneration Act (LURA) and more limited shorter-term changes through changes to the National Planning Policy Framework (NPPF), which was updated on 19<sup>th</sup> December 2023. The more significant changes include:
- Preparing and maintaining up-to-date plans is made an explicit priority and there is greater emphasis on housing delivery.

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<sup>3</sup> An ECC commissioned report has demonstrated that requiring net zero building standards has only a marginal impact on development viability in most cases:  
<https://www.essexdesignguide.co.uk/climate-change/net-zero-evidence/>



- **Standard Method** - The Standard Method for establishing a housing requirement now seen as a starting point, exceptional circumstances are still required to justify an alternative approach.
- **Housing land supply buffers** – The implementation of supply buffers has changed. If delivery of housing over the past 3 years falls below 85% then a 20% buffer is applied. The previous 5% and 10% buffers have been removed.
- **Five-year housing land supply** - Councils with a Plan that is less than 5 years old do not need to demonstrate a rolling 5-year housing land supply. For older plans, if the emerging local plan has reached Reg 18 stage only need to demonstrate a 4-year housing land supply.
- **Green Belt** - Greater emphasis under paragraph 145 that there is no requirement for Green Belt boundaries to be reviewed or changed in the preparation of Local Plan. There is still an allowance for Green Belt boundaries to be reviewed or altered where exceptional circumstances exist.
- **Design and Local Design Codes** – Additional references to beauty added throughout NPPF. Greater emphasis on the use of local design codes prepared in line with National codes.
- **Density of Development** – Consideration of densities in relation to existing character of the area.
- **Agricultural Land** – Further emphasis to consider the availability and quality of agricultural land for food production.

3.31 In terms of forthcoming changes through the LURA, the Government published details of the proposed new system of plan-making in both the December 2022 consultation and a further focused consultation in July 2023. In summary this indicates the following:

- All plans submitted after the deadline of 30 June 2025 will need to be prepared in accordance with the new system.
- The regulations, policy and guidance for the new system should be in place by autumn 2024.
- Plans under the new system should be:
  - Simpler to understand and use.
  - Prepared more quickly and updated more frequently; and,
  - Make best use of digital technology.
- A more streamlined Local Plan process which seeks to make it possible to prepare and adopt a Local Plan in no more than 30 months. The process will become more standardised with three new ‘gateway’ assessments prior to examination.
- A set of nationalised Development Management policies, which may limit the ability for local authorities to set policies beyond ‘locally-important’ matters;
- Supplementary plans will be available to help planning authorities to react quickly to changes in their areas.
- The amount of evidence required to develop a plan and defend it at examination should be reduced.
- A new Infrastructure Levy to replace Section 106.

There is currently a lack of clarity over whether these changes will ultimately be introduced and over what timetable. What is clear is that the planning system will remain plan-led, there will be a fundamental legal need for a local authority to have a

Local Plan, and the process through which any changes will be introduced will offer no immunity to the negative consequences of not having an up-to-date New Local Plan.

**Next Steps**

- 3.32 A separate item will be reported to the Planning Policy Committee setting out a programme and timetable for the future work required.

**4.0 FINANCIAL IMPLICATIONS**

- 4.1 There are no financial implications. An agreed budget is available to assist the preparation of the emerging Local Plan.

**5.0 LEGAL IMPLICATIONS**

- 5.1 There are no legal implications relating to this item.

**6.0 RESOURCE IMPLICATIONS: STAFFING, ICT AND ASSETS**

- 6.1 There are no direct implications relating to this item.

**7.0 RELEVANT RISKS**

- 7.1 There are no direct risks related to this item.

**8.0 ENGAGEMENT/CONSULTATION**

- 8.1 There are no direct implications relating to this item, although a series of engagements and consultations will accompany future stages of the Local Plan.

**9.0 EQUALITY IMPLICATIONS**

- 9.1 There are no equality and diversity implications related to this item.

**10.0 ENVIRONMENT AND CLIMATE IMPLICATIONS**

- 10.1 There are no direct implications relating to this item, although the new Local Plan and its policies will have implications for environment and climate change. Members and the public will have opportunities to respond to these.

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**APPENDICES**

None

**BACKGROUND PAPERS**

None

**SUBJECT HISTORY (last 3 years)**

<b>Council Meeting</b>	<b>Date</b>
<b>Planning Policy Committee</b> [previous version of update]	<b>27/7/2024</b>