PLANNING POLICY SUB-COMMITTEE:
17 NOVEMBER 2017

1   NEW LOCAL PLAN ISSUES AND OPTIONS DOCUMENT: DRAFT CONSULTATION DOCUMENT; DRAFT SUSTAINABILITY APPRAISAL; AND CONSULTATION AND ENGAGEMENT SUMMARY 2017

1.1   This item of business was referred by the Planning Policy Sub-Committee on 17 November 2017 to Council with recommendations relating to public consultation on the draft Local Plan Issues and Options Document and publication of an interim Sustainability Appraisal and a Consultation and Engagement Summary.

1.2   An extract of the key elements of the report of the Assistant Director, Planning & Regeneration Services to the Planning Policy Sub-Committee is attached at Appendix 1, together with a copy of the draft Local Plan Issues and Options Document, which has been amended to take account of the views of the Sub-Committee.

1.3   The Planning Policy Sub-Committee noted that public consultation was anticipated to commence in mid-December for 12 weeks, double the time specified by the Local Plan Regulations 2012 and the National Planning Policy Framework. Residents were encouraged to engage in the public consultation and to comment on all chapters of the Issues and Options Document in which they had a particular interest.

1.4   Officers had circulated to Members of the Sub-Committee an addendum to the report which took account of any shortfall in housing delivery against the District's need to date. The figures of baseline housing need for the period 2017-2037 plus any shortfalls from 2014 ranged from 7,181 to 7,871 homes. This was in response to concern raised by Members that the trajectory date – 2037 - for the quantum of development was not included in the Issues and Options document and that the 2017 Strategic Housing Market Assessment (SHMA) did not include any shortfalls in housing delivery against housing targets within the Core Strategy and Allocations Plan. Members requested that the first paragraph and table on the addendum be included in the Issues and Options Document. This has been included as tracked changes in paragraph 6.10 of Appendix A. It was emphasised that these figures represented the largest, unconstrained figures for objectively assessed housing (OAN) needs and that this figure may be reduced when environmental constraints, including Green Belt, were taken into account.

1.5   Officers emphasised, in response to a Member observation that the Government was in the process of examining the OAN methodology and that the methodology used on the SHMA was different, that it was necessary to work within existing evidence, i.e., published evidence base documents. It was likely that revised methodology would be finalised next year and that it would be necessary to revise documents to take account of any such

revisions, once these were official. It was further noted that projected housing needs had to be aligned with the District's economic ambitions and this could result in housing needs figures being increased.

1.6   Officers advised, in response to a concern raised by a Member relating to environmental protection for specific sites within the District, that the Council would seek to engage with relevant partners, e.g., Essex Wildlife Trust, to explore the possibilities for any further sites.

1.7   Members drew attention to the use of 'endeavour' and 'may' in the Communication and Engagement Summary 2017 and stressed the importance of all engagement strategies listed being utilised. Officers subsequently looked at this issue after the Sub-Committee meeting and the Statement of Community Involvement contains this flexibility, but there is no such ambiguity in the summary, which sets out what methods of engagement will be used. All engagement strategies listed will be undertaken by the Council.

1.8   Members stressed the need to use all means available to the Council to ensure that as many residents as possible contribute to the consultation process. It was felt that consultation via the Council website could disadvantage some sections of the community. It was emphasised that Council had allocated a budget of £15,000 for leaflets, which could be used to circulate consultation leaflets to every household within the District and Members all concurred that this should happen.

1.9   Officers confirmed that all feedback to the public consultation would be used to inform the next version of the Local Plan document and consultation responses would be made publicly available.

1.10   It was noted that the Portfolio Holder was working with officers to explore whether it might be a viable option to produce a video explaining the consultation process for upload to the Council website.

1.11   Officers emphasised the importance of residents responding to the consultation in respect of each individual chapter in which they had a particular interest.

2   RECOMMENDATION

2.1   It is proposed that Council **RESOLVES**

        (1)   That the draft Issues and Options Document and accompanying interim Sustainability Appraisal, as attached at Appendix A and B respectively, be published for formal public consultation for up to 12 weeks.

        (2)   That the Sustainability Appraisal Scoping Report, as attached as Appendix C, be noted as evidence and published on the Council's website.

(3)   That the activities set out in the Consultation and Engagement Summary as attached at Appendix D, be noted and published on the Council's website.

(4)   That leaflet circulation to all properties in the District be included as part of the public consultation, using the existing leaflets budget. (ADP&RS)

If you would like this report in large print, Braille or another language please contact 01702 318111.

NEW LOCAL PLAN ISSUES AND OPTIONS DOCUMENT: DRAFT CONSULTATION DOCUMENT; DRAFT SUSTAINABILITY APPRAISAL; AND CONSULTATION AND ENGAGEMENT SUMMARY 2017

1   PURPOSE OF REPORT

1.1   As the first stage of its local development plan review, the Council has prepared an 'Issues and Options' Document for public consultation. The Issues and Options Document sets out the Council's strategic vision, and a range of identified issues, challenges and opportunities facing the district beyond the end of the existing plan period in 2025.

1.2   The Issues and Options Document will be accompanied by an Interim Sustainability Appraisal report setting out the potential implications of the Issues and Options Document on environmental, social and economic factors. The Issues and Options Document will also be accompanied by a Consultation and Engagement Summary which identifies the methods and techniques that the Council intends to use to engage residents, businesses and other interested stakeholders in the public consultation.

2   SALIENT INFORMATION

National Policy Context

2.1   The National Planning Policy Framework (NPPF)[1] establishes the need for each Local Planning Authority to produce a Local Plan for its area, which is to be reviewed in whole or in part to respond flexibly to changing circumstances. This Local Plan must be prepared with the objective of contributing to the achievement of sustainable development, including meeting economic, social and environmental needs, and must be consistent with the principles and policies set out in the NPPF. Where a plan is absent, silent or out-of-date, the fall back position is the NPPF.

2.2   The NPPF sets out the core planning principles that plan-making and decision-taking should achieve, including a need for planning to be genuinely plan-led, empowering local people to shape their surroundings, with succinct plans setting out a positive vision for the future of the area. Plans should be kept up−to−date, and be based on joint working and co‑operation to address larger than local issues. They should provide a practical framework within

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[1] www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

which decisions on planning applications can be made with a high degree of predictability and efficiency.

2.3   The NPPF establishes a requirement for Local Plans to specifically:

- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of the NPPF;

- be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;

- be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;

- indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;

- allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;

- identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;

- identify land where development would be inappropriate, for instance because of its environmental or historic significance; and

- contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.

2.4   Further detail guidance on plan-making is contained with the Planning Practice Guidance (PPG)[2]. The Town and Country Planning (Local Planning) (England) Regulations 2012 set out the regulatory requirements for the preparation of a Local Plan. There is no longer a requirement to prepare and consult on three formal stages of the Local Plan; however the Council has opted to retain this approach to ensure that residents and businesses were given the earliest opportunity to help shape the Local Plan.

2.5   The Issues and Options Document represents the first stage in the review of the Council's adopted local development plan.

Adopted Local Development Plan

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[2] www.gov.uk/government/collections/planning-practice-guidance

2.6 The Council has a full complement of planning policy documents setting out the key principles which planning applications are assessed against. This local development plan plans for the district up to 2025, however changes at the national and local level – including changes to national planning policy and guidance, and new evidence – means that there is a need to review these documents to ensure that they are robust, effective and up-to-date, and to positively plan for the district beyond the end of the current plan period.

Issues and Options Document

2.7 A programme of early community engagement was undertaken at the parish level in 2016, which aimed to stimulate discussion on planning for the future of each area[3]. This programme consisted of a series of interactive workshops followed by a widely circulated survey. The outcomes and themes from this engagement with residents and businesses were collated into the Early Engagement Consultation Statement[4], and has informed the challenges and opportunities identified in the Issues and Options Document.

2.8 The Issues and Options Document identifies a series of strategic priorities and objectives to support a draft vision for the future of Rochford District; these are supported by key planning issues that have been identified for a number of themes, and potential options to deal with these issues. The Issues and Options Document considers how we can plan for growth in the future, particularly beyond the end of the current plan period, and how we might deliver the necessary infrastructure to support this. It also considers a range of issues such as the natural and historic environment, local economy, health, and community facilities, and options to support these local needs in the future.

2.9 The document is divided into a number of chapters, each structured around a key identified priority. Each chapter sets out a consideration of the identified issues and potential options to meet that priority for the future. These priorities have been set out below:

- Our Characteristics

- Our Spatial Challenges

- Our Vision and Strategic Priorities

- Delivering Homes and Jobs

- Supporting Commercial Development

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[3] www.rochford.gov.uk/new-local-plan-evidence-base

[4] https://www.rochford.gov.uk/sites/default/files/planning_cee_consultationstatement.pdf

- Delivering Infrastructure

- Supporting Health, Community and Cultural Facilities

- Protecting and Enhancing our Environment

- Detailed Policy Considerations

2.10   The Issues and Options Document has been produced to encourage the involvement of local communities, businesses and other stakeholders at the beginning of the plan-making process, so that their views can be taken into account when drafting the new Local Plan. This is the first stage in the preparation of the new Local Plan and will provide a formal opportunity for stakeholders to be involved in planning for the future of the district. There will, nonetheless, be more opportunities to be involved in the future.

2.11   The Council intends for the Issues and Options Document and accompanying Interim Sustainability Appraisal to be open for public consultation for a period of 12 weeks to take account of the holiday period.

Interim Sustainability Appraisal

2.12   The preparation of a Sustainability Appraisal (or SA) is a legal requirement under the Environmental Assessment of Plans and Programmes Regulations 2004, which transposed into national law EU Directive 2001/42/EC on Strategic Environmental Assessment (SEA). An SA is required to be published for consultation alongside a draft plan. Further guidance on the preparation of an SA, and its impact on plan-making, is contained within the PPG[5].

2.13   The Council commissioned AECOM to undertake the SA to support the preparation of the new Local Plan. As a first stage, a Scoping Report setting out the proposed scope and level of detail of information to be covered by the SA was prepared and was published for comment in December 2016, as required by the regulations. The Environment Agency, Historic England and Natural England are statutory consultation bodies for the Scoping Report, but the Council took the decision to consult more widely. The responses received were taken into account and amendments made to the baseline information and draft SA Objectives where necessary. The final Scoping Report can be found in Appendix D.

2.14   An SA report is required to answer the following three questions:

1.   What has Plan-making / SA involved up to this point?

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[5] www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#sustainability-appraisal-requirements-for-local-plans

- Including in relation to 'reasonable alternatives'.

2. What are the SA findings at this stage?

  - i.e. in relation to the Draft Plan.

3. What happens next?

  - What steps will be taken to finalise (and monitor) the plan?

2.15 An Interim SA Report has been prepared for public consultation alongside the Issues and Options Document, as required under Regulation 18 of the Town and Country Planning (Local Plan) Regulations 2012. This Interim SA Report sets out to answer the three questions above on the basis of the information and options identified within the Issues and Options Document. For this purpose, the nine topic headings below provide the framework of the report.

- Biodiversity

- Climate Change

- Landscape and Historic Environment

- Environmental Quality

- Land, Soil and Water Resources

- Population and Communities

- Health and Wellbeing

- Transport and Movement

- Economy

2.16 Following the public consultation, any representations received along with further evidence based work will help to inform an updated Interim SA Report, including consideration of more clearly defined spatial strategy options.

Consultation and Engagement Summary 2017

2.17 The Council's adopted Statement of Community Involvement (SCI)[6] sets out the methods and activities that may be undertaken throughout the plan-making process to notify, consult and engage stakeholders. The SCI was adopted in July 2017.

2.18 A further Consultation and Engagement Summary has been prepared which sets out the consultation and engagement techniques that the Council intends

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[6] https://www.rochford.gov.uk/sites/default/files/planning_sci_2016_0.pdf

to employ to ensure that the public consultation on the Issues and Options Document is well-publicised and that every interested stakeholder is provided with the opportunity to make a representation. This Consultation and Engagement Summary also sets out how the Council's consultation and engagement techniques will conform with the requirements of the adopted SCI, and details of any additional techniques that will be employed, such as methods intended to engage with noted 'harder to reach' groups.

3   RISK IMPLICATIONS

3.1   The preparation of a Local Plan is required by the National Planning Policy Framework (NPPF). Failure to update the adopted local development plan risks allowing the Council's current policies to become out-of-date, and not be reflective of new and emerging evidence, which detracts from the ability of the Council to make positive, justified and effective decisions, and also risks delivery of more speculative development. .

4   ENVIRONMENTAL IMPLICATIONS

4.1   The potential environmental implications of the identified Issues and Options Document have been set out within the Interim SA Report, where possible.

5   RESOURCE IMPLICATIONS

5.1   The preparation of the Issues and Options Document, Sustainability Appraisal and Consultation and Engagement Summary, and accompanying public consultation, will be met within existing budget provisions.

6   LEGAL IMPLICATIONS

6.1   The preparation of a Local Plan is a requirement of the National Planning Policy Framework (NPPF). Failure to review the Council's existing plan risks these existing policies becoming out-of-date, and not be reflective of new and emerging evidence.

6.2   An SA report is legally required to accompany a draft Plan to assess the environmental implications.

6.3   The Consultation and Engagement Summary has been prepared to ensure that the Council complies with the requirements of its adopted Statement of Community Involvement (SCI) and fulfils the consultation and engagement requirements for Local Plan preparation as set out in the Local Plan Regulations 2012 and the NPPF. Failure to meet satisfactory consultation and engagement standards risks the plan being found unsound at examination in public.

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New Local Plan: Issues and Options Document

Executive Summary

This Executive Summary only provides a brief summary of the draft plan and should not be used to provide comment or representations on the main Issues and Options Document.

Introduction

1.1   Rochford District Council is preparing a new Local Plan. The Local Plan is a set of documents that will set out how Rochford should develop in the future to best meet the vision that the local community has for the district. This includes setting out how much development there should be and where it should go and what infrastructure is needed to support that growth. It will also help to guide future decisions on planning applications, including what should be allowed where, and what it should look like.

1.2   Each local planning authority is required by national government policy to prepare a Local Plan, in order to deliver sustainable development that reflects the vision and aspirations of local communities.

1.3   The *Issues and Options Document* is the first stage in preparing Rochford's new Local Plan and is an opportunity for local residents, businesses and other interested stakeholders to help shape the vision for the future development of Rochford at an early stage.

What plans do we have now?

1.4   We already have a number of adopted documents which will help to shape the district up to 2025; these include a *Core Strategy*, which sets out our current vision and overarching planning principles for the District, and an *Allocations Plan*, *Development Management Plan* and four *Area Action Plans* which provide specific details on how we will achieve this vision in those localities and apply these overarching planning principles. These documents together cover a range of topics including where new homes and jobs will be delivered, where children will go to school, and how our natural and historic environments will be protected. However, it is important to ensure that we continue to plan for the future beyond 2025, and take into account new national policy and the latest evidence. This will help to make sure that our plan is up-to-date, relevant and able to deliver the vision that our local communities and businesses have for Rochford.

What is the Issues and Options Document?

1.5   The *Issues and Options Document* forms the first part of our Local Plan review, and follows a programme of early community engagement that we rolled out in Summer/Autumn 2016 through parish-level workshops and a survey. The issues, challenges and opportunities raised by residents and businesses at these workshops and from the survey have helped to inform the issues and options identified within the *Issues and Options Document*.

1.6   The *Issues and Options Document* sets out a range of key issues that have been identified on a number of themes from housing and infrastructure to healthcare and
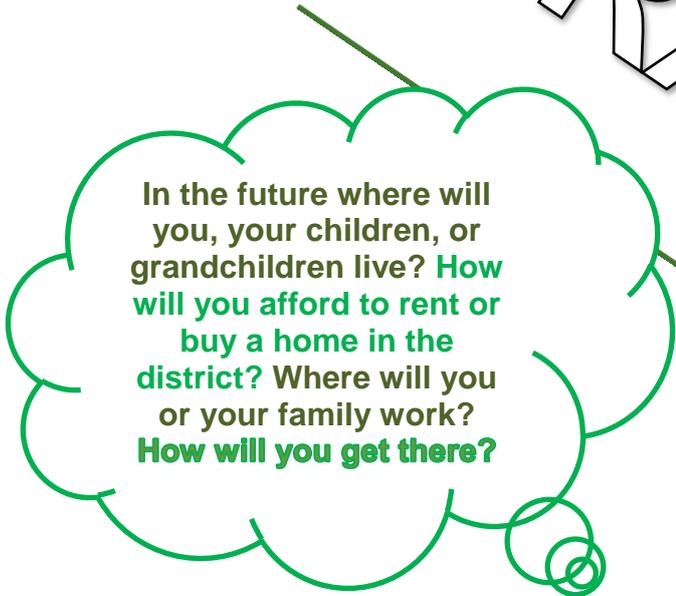
community facilities. We have also included a number of options on how each of these issues could be addressed in the future.

What are we asking for comments on?

1.7   The *Issues and Options Document* includes questions to help us understand your thoughts on how we might plan for the future of the district, and in particular whether you think the issues and options we have identified are the correct ones. The document covers a range of topics, and asks questions about:

Our Vision and Strategic Objectives

We have tried to identify what the main issues and challenges are for the district, and what our environmental, economic and social ambitions should be for the district. We also need to consider our relationship to other areas in South Essex, and how they function, as well as further afield. What should be our vision?

What should your district look like in the future? What should our ambitions be? How will we work with neighbouring areas?
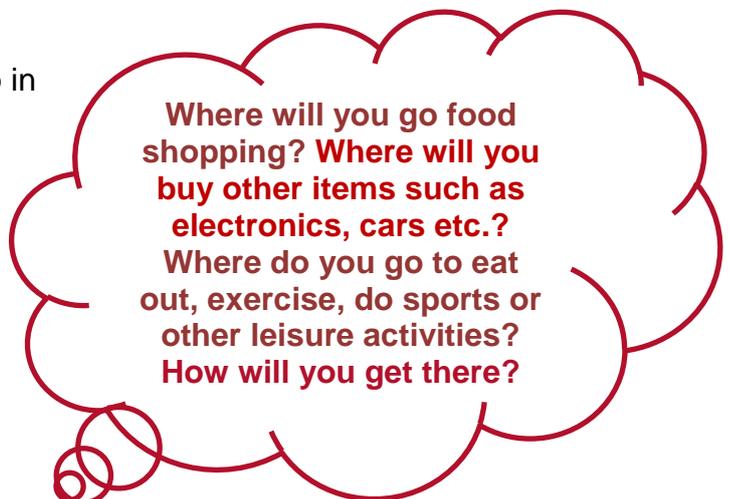
Delivering Homes and Jobs

We have a responsibility to deliver new homes and jobs in the district to meet the needs of current and future residents through planning 20 years ahead. This is based on technical modelling work to identify what our need is, and how we can meet this need. We have to consider the types of homes that will be needed, how people can afford them (particularly for those unable to buy or rent private accommodation), where people want to live, and where they want to work. How can we do this?

In the future where will you, your children, or grandchildren live? How will you afford to rent or buy a home in the district? Where will you or your family work? How will you get there?

Supporting Commercial Development

We need to consider where people will shop in the future, both for everyday goods such as food, and for consumables such as electronic items, cars etc., and accessing leisure activities. Although we have small, distinctive towns and villages in the district, we ensure their growth and survival, and encourage people to continue to visit them. How can we best maintain, grow and attract the best possible commercial and leisure opportunities to

Where will you go food shopping? Where will you buy other items such as electronics, cars etc.? Where do you go to eat out, exercise, do sports or other leisure activities? How will you get there?

support our district's local economy?

> How will you get from where you live to where you work in the future? What prevents you from using public transport? How will your children get to school or college?

Supporting Health, Community and Culture

Health and well-being is important. These can be improved not just by improving access to physical healthcare facilities such as doctors and dentists, but also to opportunities for physical activity such as open spaces. Access to education and childcare, as well as, facilities for the wider community, young people and children are also vitally important for our communities. How should we plan to ensure that our communities are healthy, active and social in the future?

> What will our historic centres look like in the future? How will we achieve the right balance between protecting our unique environment as well as also provide for the needs of existing and future generations?

Delivering Infrastructure

Infrastructure includes a whole range of facilities that we use everyday such as roads, footpaths, public transport, utilities, community centres, pubs etc. We need to ensure that these types of infrastructure across the district meet the needs of residents, businesses and visitors in the future. We need to work with infrastructure providers and neighbouring areas to ensure a joined-up planning approach. What types of infrastructure should we be focussing on to support our needs now and in the future?

> Where will your children go to school or college? How will you access your local healthcare facilities? Where will your local parks and green spaces be? How will you access childcare facilities?

Protecting and Enhancing our Environment

The district is characterised by small towns and villages set in a rural and coastal environment, which is defined by the heritage and culture of the area. There are many areas which are protected by environmental designations, most of the district is designated as 'Green Belt' and there are many valued landscapes. We have 10 Conservation Areas, and hundreds of Listed Buildings, highlighting the unique history of the district. How can we preserve and enhance, wherever possible, our historic and natural characteristics in the future?

Detailed Policy Considerations

What should our specific, detailed planning policies require to ensure the best possible quality of development where it is most appropriate?

1.8   You can view the full *Issues and Options Document*, and all supporting documents, at www.rochford.gov.uk/newlocalplan.

Why do we need to plan?

1.9   Our current adopted documents are delivering homes, jobs and infrastructure to meet the current needs of the District, but if not reviewed, these documents may become out of date. Having an up-to-date plan is a requirement of national planning policy, and without one, we would not have a robust, relevant or well-informed policy framework to assess planning applications against, or meet the needs of local residents and businesses.

How can you give us your views?

1.10   Involvement of local residents and businesses is fundamental to effective plan-making to ensure that we not only plan effectively to meet local needs but ensure that we plan for the right development in the right places. We want to hear from both local residents and businesses to make sure that we are able to represent the needs of all in our local community.

1.11   We are inviting comments on the main *Issues and Options Document*, and its accompanying *Draft Sustainability Appraisal*, from [date and time to be inserted]. Comments can be made in any of the following ways, but please be aware that late comments may not be accepted:

Online – using our online public consultation system: **www.rochford.gov.uk/iao**.This is a simple process requiring a valid email address.

Email – **issuesandoptions@rochford.gov.uk**

Post – Planning Policy, Rochford District Council, Council Offices, South Street, Rochford, Essex. SS4 1BW.

Fax – 01702 318181

1.12   Please be reminded that this Executive Summary document only provides a brief summary of the draft plan and should not be used to provide comment or representations on the main *Issues and Options Document*.

1.13   There is a lot of information in the *Issues and Options Document* and you may only want to look at one or two sections depending on which issues you are interested in. You can respond to as many or as few issues as you like. The future of the district is important for everyone who lives, works or visits so now is a great opportunity to get involved and have your say.

What happens next?

1.14   After this consultation on the *Issues and Options Document*, we will review and respond to the comments that have been received. We will then continue developing the evidence base to support our plan-making and, taking the comments received into account, will be working towards the preparation of a draft new local plan that sets out our preferred options for the future of the district. This will be available for further public consultation in the future.

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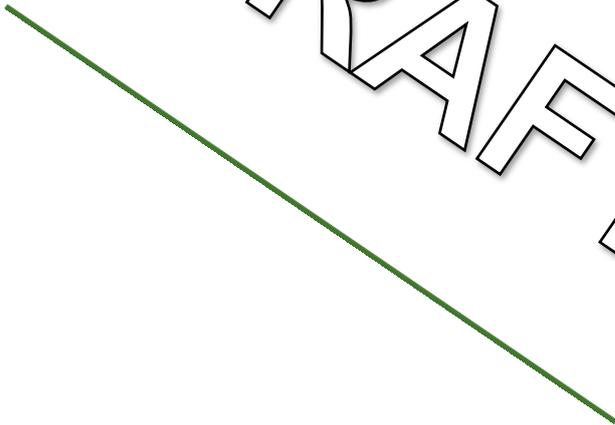
Rochford District Council

Draft New Local Plan: Issues and Options Document 2017

Extraordinary Full Council

28 November 2017

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Contents

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1   Introduction

Why do we need a new Local Plan?

1.1   The new Local Plan is a planning policy document which will guide how Rochford District will look over the next 20 years, covering a range of topics including the challenge of balancing the need to deliver homes and jobs supported by the necessary infrastructure, whilst protecting the local environment. The new Local Plan is an important document in setting out a shared vision for the future our district.

1.2   We already have a number of adopted policy documents which form the current local development plan for the district up to 2025, including a *Core Strategy*, *Allocations Plan*, *Development Management Plan* and four *Area Action Plans*[1]. These documents were adopted between 2011 and 2015 and each went through several stages of consultation and engagement before being approved by an independent planning inspector. However changes at the national and local level – including changes to national planning policy and guidance, and new evidence – mean that there is a need to review these documents to ensure that they are robust, effective and, most importantly, up-to-date. We are therefore at the early stages of reviewing our current local development plan; with this document, the *Issues and Options Document*, being the first stage in this review process.

1.3   If we do not have a new Local Plan that is up-to-date it is possible that – depending on the scheme – we could lose the ability to control and plan for change and growth in the future. Although we have our current local development plan up to 2025 this is in need of updating to reflect changes in circumstances since its adoption. Without an up-to-date plan we may not have a robust policy position that we can assess planning applications against. Therefore, if we reject a scheme without good reason, developers could successfully appeal that decision. National planning policy in the form of the *National Planning Policy Framework* (*NPPF*)[2] places great emphasis on planning decisions to be made in accordance with the local development plan. However the *NPPF* also says, for example, that there should be a presumption in favour of sustainable development particularly in decision-making where a plan is absent, silent or the relevant policies are out-of-date. It is therefore vital that we set out a clear plan for the future of our district.

What is the Issues and Options Document?

1.4   The *Issues and Options Document* is the first stage in the review of the current local development plan for the whole of Rochford District. It identifies a series of strategic priorities and objectives to support the draft vision for the future of our district; these are supported by key planning issues that have been identified for a number of themes, and potential options to deal with these issues. This document considers how we can plan for growth in the future – particularly beyond the current plan period of 2025 – and deliver the necessary infrastructure to support this. Although different

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[1] www.rochford.gov.uk/planning-and-building/planning-policy/adopted-plans
[2] The government has announced that it intends to make significant changes to the *NPPF* and aims for these to take affect in the first half of 2018. This document relates to the current *NPPF* and any changes in the new *NPPF* will be reflected our second stage consultation on the Local Plan.

options are considered, specific sites are not identified in this document; more detailed planning policies will evolve as each consultation stage on the new Local Plan progresses.

1.5   This document is divided into a number of key sections:

- Our Characteristics

- Our Spatial Challenges

- Our Vision and Strategic Priorities

- Delivering Homes and Jobs

- Supporting Commercial Development

- Delivering Infrastructure

- Supporting Health, Community and Cultural Facilities

- Protecting and Enhancing our Environment

- Detailed Policy Considerations

1.6   As part of addressing the issues that have been identified we are continuing to build the background evidence to support and inform the preparation of the new Local Plan[3]. Some evidence base documents have been completed but a number of documents will be prepared and updated throughout the plan-making process.

1.7   The *Issues and Options Document* has been produced to encourage the involvement of local communities, businesses and other stakeholders at the beginning of the plan-making process, so that their views can be taken into account when drafting the new Local Plan. This is the first stage in the preparation of the new Local Plan and we are now asking for your views on the issues and options that have been identified; however there will be more opportunities to be involved in the future.

How have you assessed the sustainability impacts?

1.8   The *NPPF*[4] states that Local Plans are key to delivering sustainable development. Development is broadly considered to be sustainable where it strikes an appropriate balance between environmental, economical and social factors to meet the needs of the present generation without compromising the ability of future generations to meet their own needs.

1.9   Sustainability Appraisal is a technical background document which assesses the potential environmental, economic and social implications – i.e. the sustainability – of an emerging plan and its proposed policies. Undertaking this type of appraisal is a key part of the plan-making process, and is pivotal in addressing the legal

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[3] www.rochford.gov.uk/new-local-plan-evidence-base
[4] Paragraph 150-151

requirements of the Strategic Environmental Assessment or SEA Directive (EU Directive 2001/42/EC). The Sustainability Appraisal process must be undertaken correctly otherwise this can expose a Local Planning Authority to legal challenge, which could threaten the delivery of a Local Plan.

1.10 The preparation of a Sustainability Appraisal is ongoing, and it should be prepared, consulted upon and updated at each stage of the plan-making process. The first stage is the preparation of a scoping report, which sets out the context, objectives and approach of the appraisal; and identifies the relevant environmental, economic and social issues and objectives. A draft scoping report was prepared by independent consultants, AECOM, for the new Local Plan. Historic England, Natural England and the Environment Agency as statutory consultees were formally consulted on the draft between 19 December 2016 and 31 January 2017 as required by the *Planning Practice Guidance (PPG)*. The draft scoping report was published on our website, and residents, business and other stakeholders on our mailing list were also directly consulted.

1.11 The revised scoping report has formed the foundations for the second phase of the Sustainability Appraisal process to support the preparation of the new Local Plan. A *Draft Sustainability Appraisal* has been prepared to accompany the *Issues and Options Document*. As the plan-making process progresses considerations within the *Sustainability Appraisal* will be integrated throughout to ensure that the proposed approach is the most appropriate from a sustainability perspective. We are now seeking your views on the *Draft Sustainability Appraisal* which assesses the sustainability implications of the *Issues and Options Document*. This document is available to view on the Rochford District Council website[5] and paper copies are available in local libraries and Council reception areas. Your comments on the *Draft Sustainability Appraisal* are welcomed and will be used to help inform the preparation of the Sustainability Appraisal as we move forward with the plan-making process.

How have you assessed the environmental impacts?

1.12 We are required to carry out a *Habitat Regulations Assessment* or HRA which assesses whether an emerging plan and its proposed policies would have an adverse effect on European habitats. European habitats include Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites. The Crouch and Roach estuaries, for example, are designed as an SPA and SAC. Where an adverse effect on a protected site is identified, the Habitat Regulations Assessment will identify appropriate mitigation measures. A *Draft Habitats Regulations Assessment* will accompany the next phase of the plan as options are narrowed down, however the *Draft Sustainability Appraisal* provides some commentary in relation to impact on habitats to support the *Issues and Options Document.*

1.13 Other assessments will form part of the evidence relating to environmental considerations, including a Local Wildlife Sites (LoWS) assessment to identify areas of key ecological importance, a landscape character assessment to better understand valued local landscapes and an Environmental Capacity Study.

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[5] www.rochford.gov.uk/planning-and-building/planning-policy/new-local-plan

How have you worked with key partners?

1.14   There is a requirement for Local Planning Authorities, as set out in the Localism Act 2011, to work with relevant bodies on strategic cross boundary issues, this is known as the Duty to Co-operate. Relevant bodies include Rochford District Council, Essex County Council and neighbouring Local Planning Authorities. Such engagement should be constructive, active and ongoing, and although there is not a requirement for relevant bodies to agree, we are required to demonstrate a level of cooperation. The Duty to Co-operate, and how effective this has been, will be considered by a Planning Inspector at the independent examination stage of plan-making. Early and ongoing engagement with relevant bodies is therefore vital to ensure that this does not hinder the delivery of the new Local Plan later on in the process.

1.15   We have been working in partnership with neighbouring Local Planning Authorities and Essex County Council over a number of years; as evidenced in our *Duty to Co-operate Topic Paper*[6]. This includes on-going engagement through one-to-one and South Essex planning officer, Member and Head of Service meetings, workshops on strategic cross-boundary issues and the preparation of joint evidence base work. We have been actively involved in the Local Plan consultations of other Local Planning Authorities within South Essex, as well as neighbouring Local Planning Authorities in west and central Essex and London. This is to ensure that our district's interests including its environment, infrastructure, economy, and local communities are appropriately considered and protected. We have also been involved in the preparation of the minerals and waste planning policy documents, which have been prepared jointly by Essex County Council and Southend Borough Council as the responsible local planning authorities. This includes the Essex Minerals Local Plan 2014 and the Essex and Southend-on-Sea Waste Local Plan 2017[7].

How can local communities get involved?

1.16   Community engagement and feedback will form an important part of the plan-making process. A programme of early community engagement workshops were rolled out over the summer of 2016 to inform the themes identified in this *Issues and Options Document*. The workshops were well received overall and have formed an important engagement starting point with local communities which will be taken forward at each stage of plan preparation. Those residents and businesses who were unable to attend the workshops were given the opportunity to submit their views through a widely-circulated survey. A complete overview of the discussions and outcomes of the workshops, and responses to the survey, is available in on our website[8]. More information on how local communities can get involved is set out in 'Tell Us Your Views' chapter.

1.17   There are other ways for local communities to get more involved in planning for their areas. In our district, the Parish or Town Councils have the option to prepare their own neighbourhood plans and orders that complement the new Local Plan. The Parish or Town Councils have the ability to prepare the following:

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[6] www.rochford.gov.uk/planning-and-building/planning-policy/new-local-plan
[7] www.essex.gov.uk/Environment%20Planning/Planning/Minerals-Waste-Planning-Team/Planning-Policy/Pages/Default.aspx
[8] www.rochford.gov.uk/sites/default/files/planning_cee_consultationstatement.pdf

- A Community Right to Build Order – this enables small scale development in local communities such as housing or community facilities

- A Neighbourhood Development Order – this enables Parish or Town Councils to grant planning permission for certain types of development without the need for people to apply to the District Council

- A Neighbourhood Plan – this provides locally specific policies for the development and use of land in a neighbourhood area (normally within a Parish or Town boundary)

1.18   The main objective of community-led planning is to plan positively for future development within an area, not to prevent growth but to provide a localised policy framework to build on the strategic policies set out in the new Local Plan.

1.19   We are keen to work with local communities who are working on their Neighbourhood Plan to ensure that it complements the new Local Plan. Canewdon Parish Council has had its 'neighbourhood area' approved, after a period of public consultation, and is currently the only local community group that is progressing its Neighbourhood Plan[9]. Once a Neighbourhood Plan has been finalised, a referendum is held in the neighbourhood area it covers. If it is approved by the community, it will be adopted by us and will form part of the future local development plan.

How will the plan be evidenced?

1.20   We need to ensure that any proposals within the new Local Plan are supported by robust, up-to-date information. A number of documents, including feedback reports from consultation and engagement events, background studies, survey and research, have been prepared to date – a number of which have been mentioned above[10]. The evidence to support the new Local Plan will continue to be prepared and updated, where necessary.

1.21   In parallel with the preparation of the new Local Plan, we are producing an *Infrastructure Delivery Plan* (*IDP*) with input from key infrastructure and service providers. The *IDP* will assess the impact of proposed development on infrastructure and set out necessary infrastructure required to support proposed development. We have produced an *Infrastructure Delivery Topic Paper* which sets out our baseline infrastructure position following the adoption of our local development plan. This will in turn inform the *Community Infrastructure Levy* (*CIL*) which will be prepared to set out the circumstances that the *CIL* will be applied and the key infrastructure that the *CIL* will seek to fund.

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[9] www.rochford.gov.uk/planning-and-building/planning-policy/neighbourhood-planning
[10] www.rochford.gov.uk/new-local-plan-evidence-base

2   Tell Us Your Views

How can I have my say?

2.1   Community participation in plan-making – both local residents and businesses – is central to the creation of a shared vision to deliver prosperous, sustainable communities. We are now asking you to tell us what you think about the issues and options that have been identified for the future of your district.

2.2   We are inviting comments on the *Issues and Options Document*, and its accompanying *Draft Sustainability Appraisal*, from [date and time to be inserted]. Comments can be made in any of the following ways, however late comments may not be accepted:

- **Online** – using the Council's online public consultation system for planning policy available at **www.rochford.gov.uk/iao**. This is a simple process requiring a valid email address. If you are already registered on the Planning Policy mailing list, you do not need to re-register.

- **Email** – **issuesandoptions@rochford.gov.uk**

- **Post** – Planning Policy, Rochford District Council, Council Offices, South Street, Rochford, Essex. SS4 1BW.

- **Fax** – 01702 318181

2.3   We will listen to the feedback we receive during this consultation and this will help us shape the next stages of preparing the new Local Plan. We will continue to do this at each stage of its preparation. If you are interested in what we have done previously, more information can be found on our website[11].

How are you engaging with residents and businesses?

2.4   We have prepared a local *Statement of Community Involvement* which details how we plan to widely and proactively engage with local communities and businesses on local planning matters. Our *Statement of Community Involvement 2016* sets out the techniques we will use to consult and engage on our planning policy documents[12]. This is in compliance with the legal requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. We have also prepared a *Consultation Summary Paper* which sets out how we have met the requirements of the 2012 Regulations and our *Statement of Community Involvement 2016.*
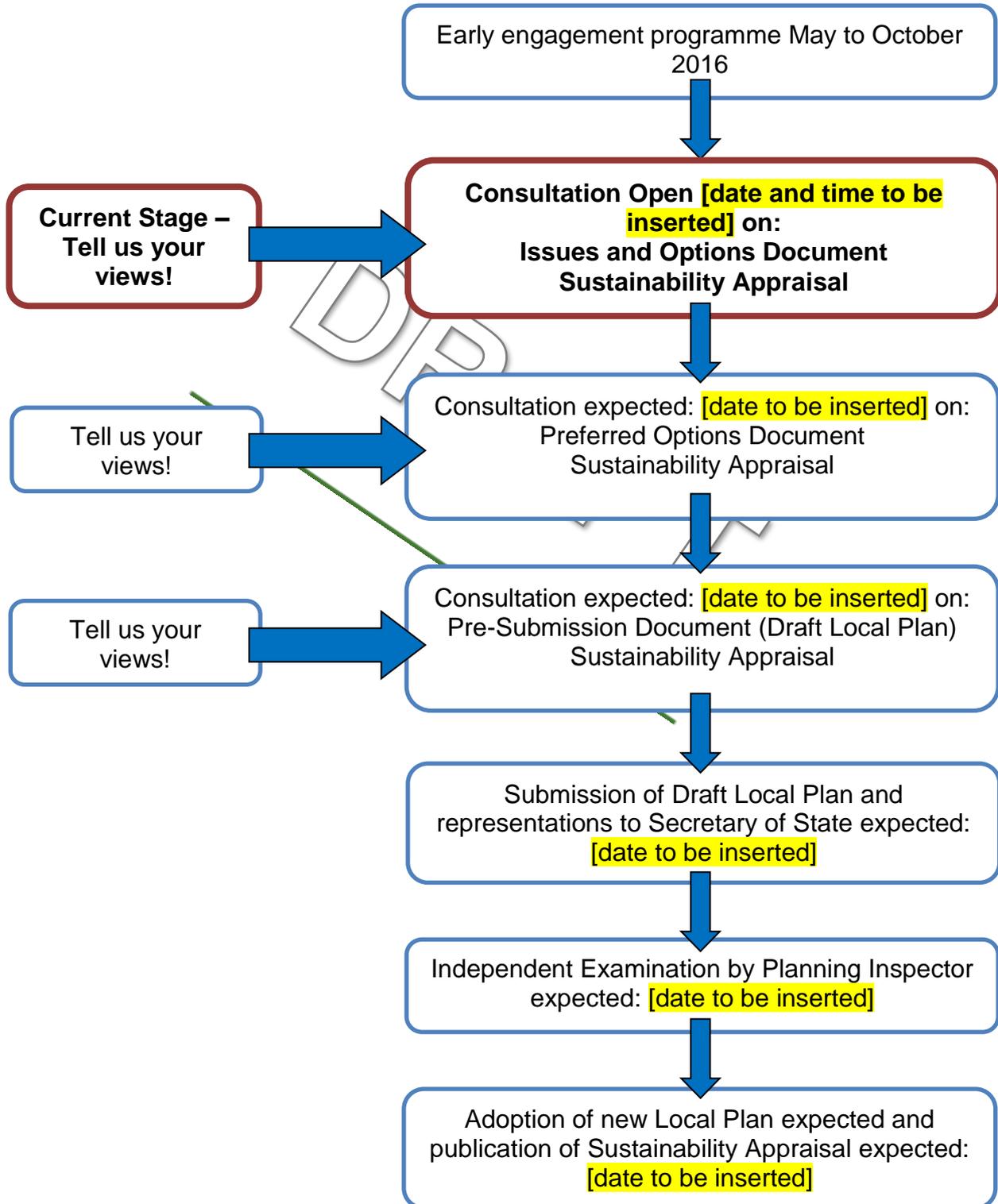
What are the next steps?

2.5   After this consultation on the *Issues and Options Document* we will review and respond to the comments that have been received. We will then continue developing the evidence base to support our plan-making and, taking the comments received into account, will be working towards the preparation of a draft new Local Plan that sets out our preferred options for the future of the district. It is anticipated that this plan will

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[11] www.rochford.gov.uk/planning-and-building/planning-policy
[12] www.rochford.gov.uk/sites/default/files/planning_sci_2016_0.pdf

be published for consultation in 2018. The new Local Plan will go through a number of stages and there will be opportunities for you to get involved at each point. The diagram below sets out the broad timetable that we are looking to follow to prepare the new Local Plan as of October 2017.

Early engagement programme May to October 2016

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Current Stage – Tell us your views! → **Consultation Open [date and time to be inserted] on: Issues and Options Document Sustainability Appraisal**

↓

Tell us your views! → Consultation expected: [date to be inserted] on: Preferred Options Document Sustainability Appraisal

↓

Tell us your views! → Consultation expected: [date to be inserted] on: Pre-Submission Document (Draft Local Plan) Sustainability Appraisal

↓

Submission of Draft Local Plan and representations to Secretary of State expected: [date to be inserted]

↓

Independent Examination by Planning Inspector expected: [date to be inserted]

↓

Adoption of new Local Plan expected and publication of Sustainability Appraisal expected: [date to be inserted]

3.25

3   Our Characteristics

Introduction

3.1   Located east of London, our district is situated on a headland between the River Thames and River Crouch, and is bounded to the east by the North Sea. We have land boundaries with Basildon, Castle Point and Southend Borough Councils, as well as marine boundaries with Maldon District and Chelmsford City Councils. Our district has links to the M25 via the A127 and has a direct rail link to London. In 2015, the area was home to an estimated 85,144 people dispersed across a number of settlements – the three largest of which are the towns of Rayleigh, Rochford and Hockley. The main settlements in the district and the key strategic transport routes connecting us to neighbouring areas, London and beyond are illustrated in Figure 1.

Figure 1: Map of the district
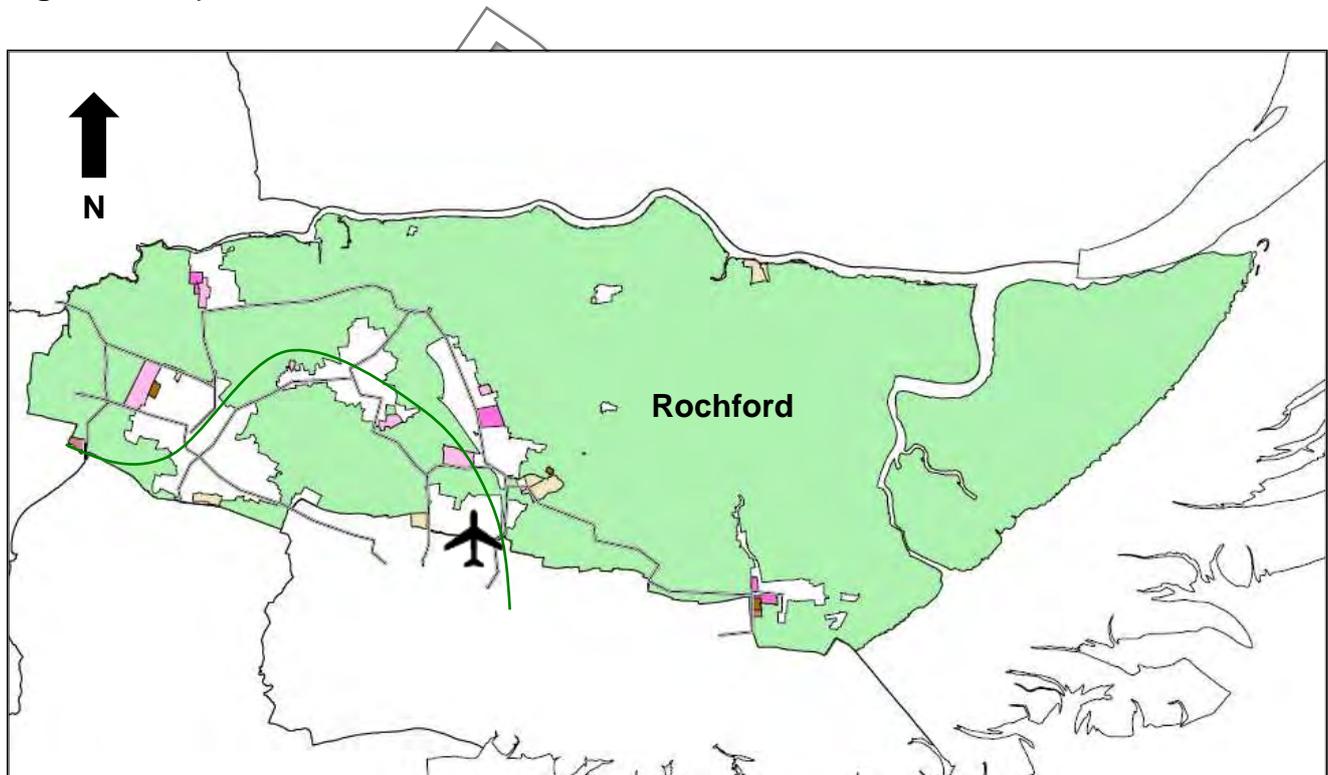
Legend

▇ (green)	Rochford District
——	Principal Roads
▇ (cream)	Existing Employment Land Allocations
▇ (pink-red)	New Employment Land Allocations
▇ (brown)	Brownfield Residential Land Allocations
▇ (magenta)	Settlement Extension Residential Land Allocations post-2021
▇ (light pink)	Settlement Extension Residential Land Allocations pre-2021
—— (green)	Railway line

3.2   The area has a total land mass of 16,800 hectares, including Foulness Island, which is predominantly rural in nature. This is reflected in the fact that 12,481 hectares, which excludes Foulness Island, are designated as Metropolitan Green Belt. Large areas of the district are of ecological importance, with Sites of Special Scientific Interest totalling 2,268 hectares and Natura 2000 Sites exceeding 2,000 hectares. The area is rich in heritage and natural beauty, with many miles of unspoilt coastline and attractive countryside. There are more than 200 sites of archaeological interest, 14 Ancient Woodlands and several nature reserves across the district.

Our Economy

Key Economic Characteristics:

➢ We are home to around 3,320 businesses, with 95% employing fewer than 10 people, and the highest number of surviving start up businesses in Essex

➢ London Southend Airport is a regionally important and expanding airport, with over 93,000m^2 of additional employment floorspace being delivered at the Airport Business Park in Rochford, including an innovation centre

➢ We have a strong relationship with Southend and London. Unemployment is very low and we have low deprivation levels

➢ Skills levels are above average relative to the rest of Essex, with 92% of the working age population having a minimum qualification of NVQ level 1, and we have an increase in apprenticeship starts year on year

3.3   As a district we are part of South Essex, which is a national priority area for growth and regeneration[13]. The area home to around 3,320 businesses and we have a low unemployment rate[14]. London Southend Airport has expanded in recent years including an extension of the runway into neighbouring Southend Borough, the development of a new terminal building and dedicated railway station with direct links to central London via the Southend Victoria to London Liverpool Street Line.

3.4   As of 2016, the district had 26,138 m^2 of office floorspace and over 1 million m^2 of manufacturing, industrial and warehouse floorspace. The available floorspace is to grow considerably following the construction of Airport Business Park located along Cherry Orchard Way in Rochford which began in early 2017.

3.5   We have a small, but productive, and enterprising economy. Although our workforce does not have significant levels of 'high skills', the skills level which underpins the local economy is generally above average compared to the rest of Essex, and supports a healthy share of knowledge-driven jobs. Around 92% of the working age population in the district has a minimum qualification of NVQ level 1. Skills that are in demand include communication, teaching and customer services. The workplace and resident earnings in the district are below average compared to Essex and the UK.

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[13] www.southeastlep.com/images/uploads/resources/TGSE_South_East_LEP_-_Growth_Deal_and_Strategic_Economic_Plan_WEB-7.pdf
[14] www.essexesb.co.uk/public/files/6123b-Rochford%20District%20Profile%20Full.pdf

3.6   The area is a generally prosperous part of the country, despite only a modest share of resident 'knowledge workers', the typically higher paid employees. This is reflected in reasonably low deprivation, excellent health conditions among our population (although some pockets of poorer health in the more urban areas are evident), and one of the lowest crime rates in the country.

3.7   The proximity of Southend to the south of the district and the relationship between this urban area and our predominantly rural district has a considerable impact upon our characteristics. Southend is the most populated area in Greater Essex and is one of the largest retail centres in South Essex, attracting consumer expenditure from a wider area and contributing to the leakage of spending out of the district. The retail catchment area of Southend overlays those of all of the district's centres.

3.8   In addition, Southend provides a range of employment opportunities and is within easy commuting distance of a large proportion of our population, and vice versa. As we are located to the east of London and benefit from a direct train link, a significant proportion of our working age population is also within easy commuting distance of the city. As such, we have a particularly strong relationship with London and Southend, and contribute to workforce flows between other areas in Essex, as illustrated in Figures 2 and 3

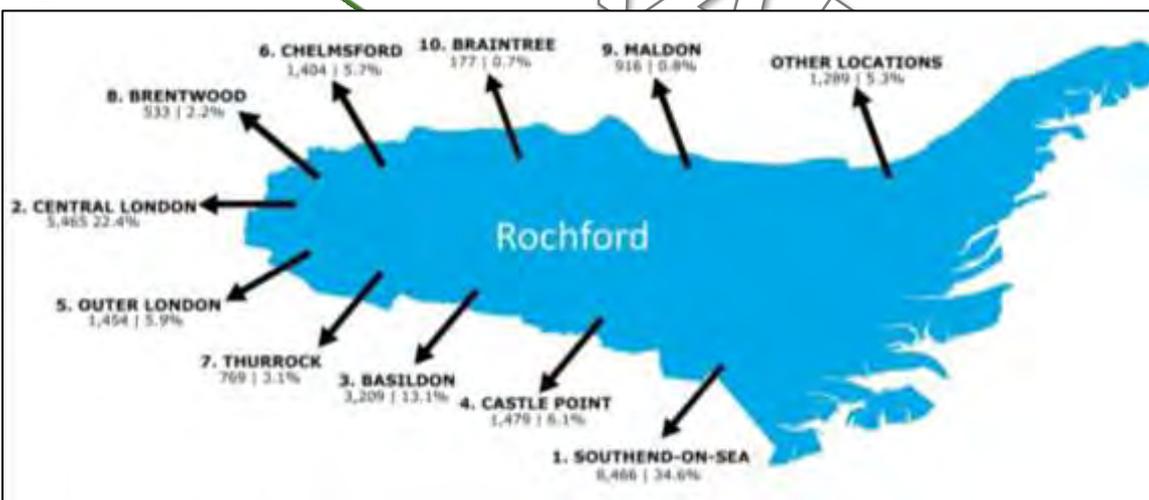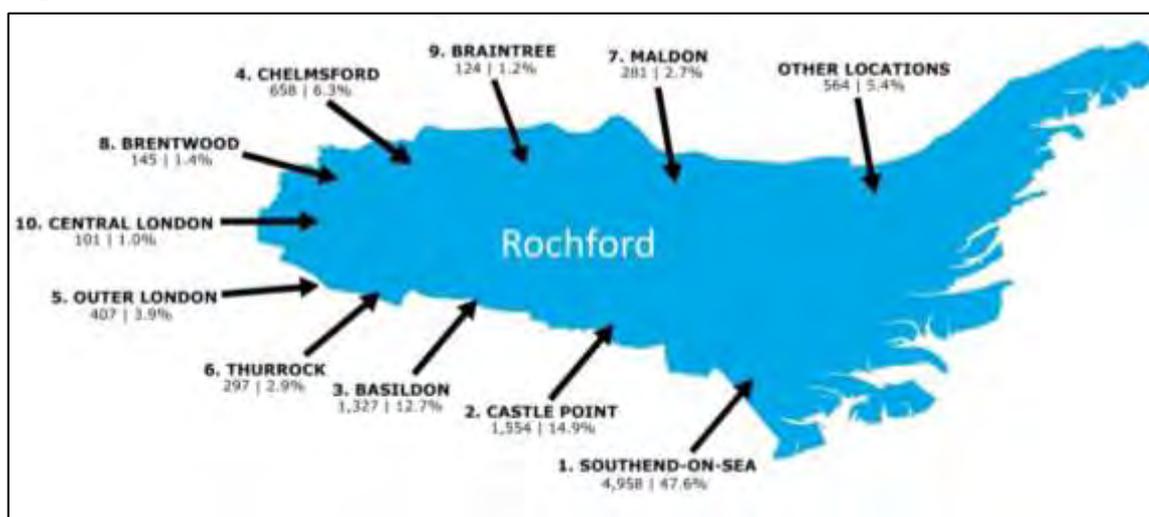**Figure 2:** Travel to work outflows from 2011 Census

Figure 3: Travel to work inflows from 2011 Census

3.28

3.9   In 2015, the district had an unemployment rate of approximately 6% which is slightly higher than the county average of 4.9% but is a reduction from 2013 levels of approximately 8%. The percentage of adults aged 16-64 who were in employment in 2015 was 74.7%, just below the county average of 76.2%[15]. It is however estimated by the Office for National Statistics (ONS) that between 2015 and 2025 the proportion of the working age population will fall slightly from 55% to 52%.

3.10   Overall we have quite a diverse employment base with a large number employed in the public sector or financial and business services. A breakdown of the proportion of district residents employed in certain sectors is illustrated in the Figure 4.
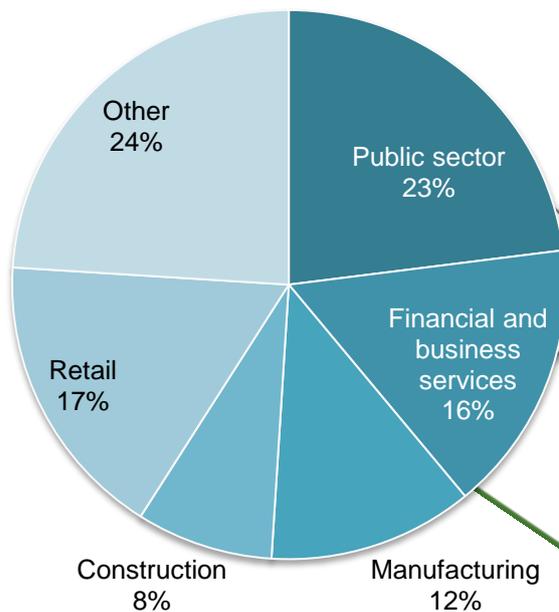

Figure 4: Breakdown of employment proportion per sector (2015)

3.11   In 2014-15, there were 740 apprenticeship starts by our residents compared to 560 starts in 2013-14. The largest employment sectors in the district include the construction, retail, professional, scientific and technical sectors, and higher rates of business growth have been recorded in the district than in the eastern region and the UK. Of the businesses operating in the district, 95% employ fewer than 10 people.

3.12   There are a number of longer term opportunities that are emerging which could further drive the local economy. This includes proposed improvements to the strategic highway network, including the A127 and A130 and sustainable transport provision, including the rail and bus networks, the ongoing work on the RSPB Wallasea Island Wild Coast Project, and the development of the Airport Business Park which is located to the north west of London Southend Airport. Plans are also in place to support the expansion of nearby schools in order to develop the skills of residents. The growth of London Southend Airport has provided local businesses with the opportunity to grow and access European markets.

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[15] www.essexinsight.org.uk/Resource.aspx?ResourceID=382

Our Environment

Key Environment Characteristics:

➢ Our district has significant areas of ecological value, particularly the Crouch and Roach estuaries and Foulness Island

➢ We have an extensive coastline, including the RSPB's Wallasea Island Wild Coast Project which is an ecological tourism opportunity

➢ The Upper Roach Valley is a particularly important landscape which provides an opportunity for accessible recreational uses

➢ We have areas of significant historic importance, with nearly 400 Listed Buildings, 10 Conservation Areas and five Scheduled Ancient Monuments

3.13 The character of our district is split, with a clear east-west divide. Areas at risk of flooding and of ecological importance are predominantly situated in the sparsely populated, relatively inaccessible east. The west of our district, however, contains the majority of our population, has better access to services and fewer physical constraints.

3.14 The predominantly rural nature of our district offers the potential to position us as the 'green part' of the South Essex. Large areas of public open space are located close to the towns of Rayleigh, Hockley and Rochford in the west, within the Upper Roach Valley, including Hockley Woods and Cherry Orchard Jubilee Country Park. Such open spaces provide accessible, quality recreational opportunities for our local communities. Our coast however is largely undeveloped, relatively inaccessible, and home to large areas of ecological importance, including Sites of Special Scientific Interest, Special Protection Areas, Ramsar Sites and Special Areas of Conservation. Foulness Island – which is the far eastern extent of our district – is owned by the Ministry of Defence with restricted and limited access. There are also smaller areas dispersed across our area, which are of local biodiversity importance, including Local Wildlife Sites and Local Nature Reserves. Figure 5 illustrates the extent of protected ecological areas across our district.

3.15 Due to our coastal nature, however, some areas of our district are identified by the Environment Agency as being at risk of river (fluvial) or sea (tidal) flooding. Approximately 7,071 hectares of our district have a 1% annual probability of fluvial flooding and/or a 0.5% annual probability of tidal flooding. Other areas of our district have been identified as being at risk from surface water, ground water and ordinary watercourse flooding; this is the responsibility of Essex County Council as the Lead Local Flood Authority. There are a number of critical drainage areas (CDAs) in our district, which are at risk of flooding and Essex County Council, with support from the Environment Agency, are implementing actions to minimise the risk.

3.16 A significant proportion of our area is important for its landscape and/or ecological value. The landscape character of our district is broadly made up of three types; Crouch and Roach Farmland; Dengie and Foulness Coastal; and South Essex Coastal Towns. The latter of these three is least sensitive to development, which is

located towards the western extent of our district. Much of our area is flat and low lying, predominantly in the east, with more undulating gradients towards Rayleigh providing contrasting landscapes. The underlying geology has helped shape the varying landscapes across the district; which consists of one of the most substantial brickearth deposits within Essex. This resource is the most extensive and important in Essex, and although they remain unworked they require protection for the future.

Figure 5: Ecological Map of the District
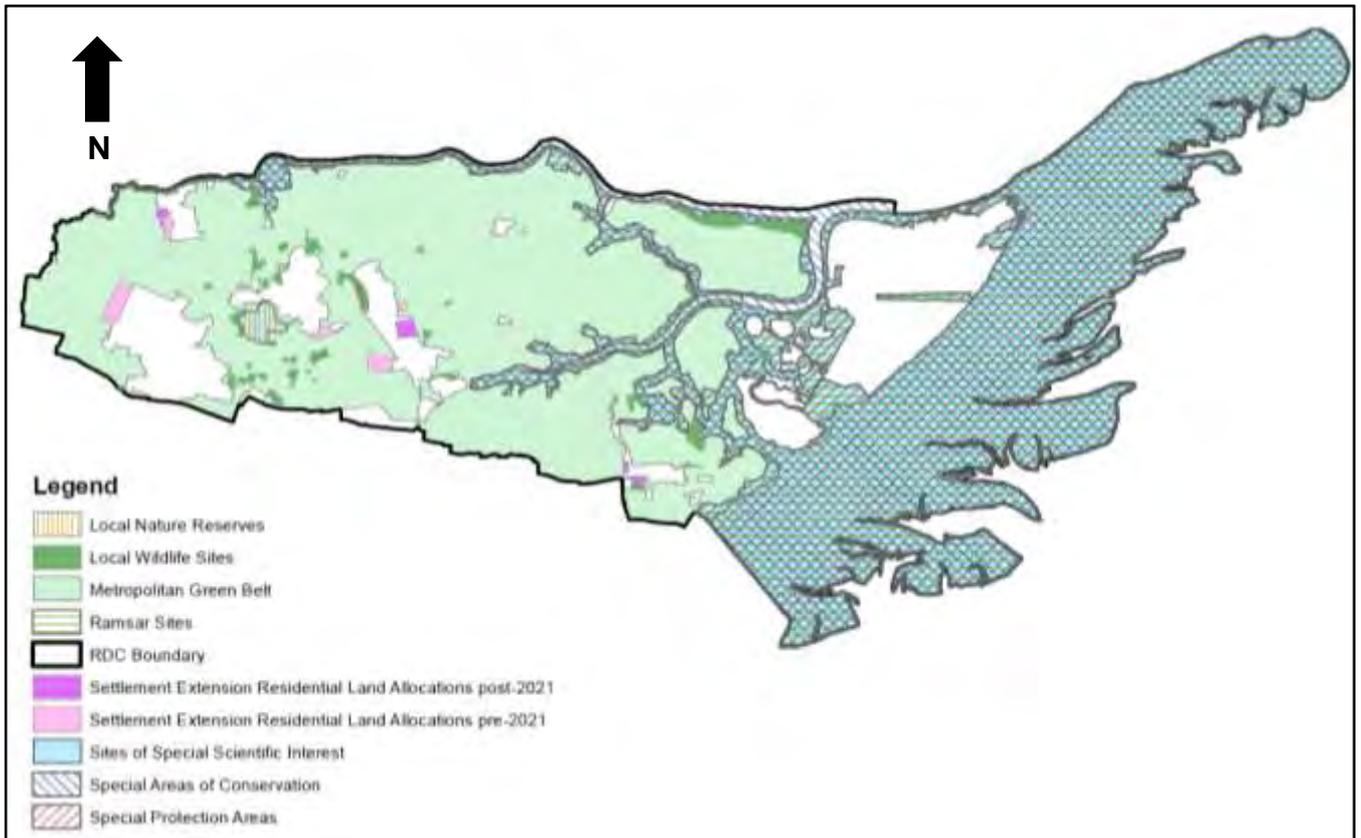
3.17   The physical geography of our district gives rise to the potential to explore opportunities to promote tourism. The RSPB's Wallasea Island Wild Coast Project, adjacent to the realigned coast of Wallasea Island, represents a particular tourism opportunity – one which will have to be carefully managed given the area's ecological importance. Natural England are also spearheading the creation of the England Coast Path to develop a continuous path to improve public access.

3.18   Our district is rich in historical and cultural heritage and is home to a number of historic assets including the historic towns of Rochford and Rayleigh. We have 10 designated Conservation Areas dispersed across our district, which are areas of high historic value. Careful attention must be given to ensuring that any changes continue to preserve and enhance the unique character of such areas, whilst allowing them to adapt to change. We are also home to nearly 400 Listed Buildings and five Scheduled Ancient Monuments, as well as a number of heritage assets which are not listed nationally but are considered to be of local historic importance. The distribution of historic assets across our district is shown in Figure 6.

3.31

Figure 6: Historic Map of the District
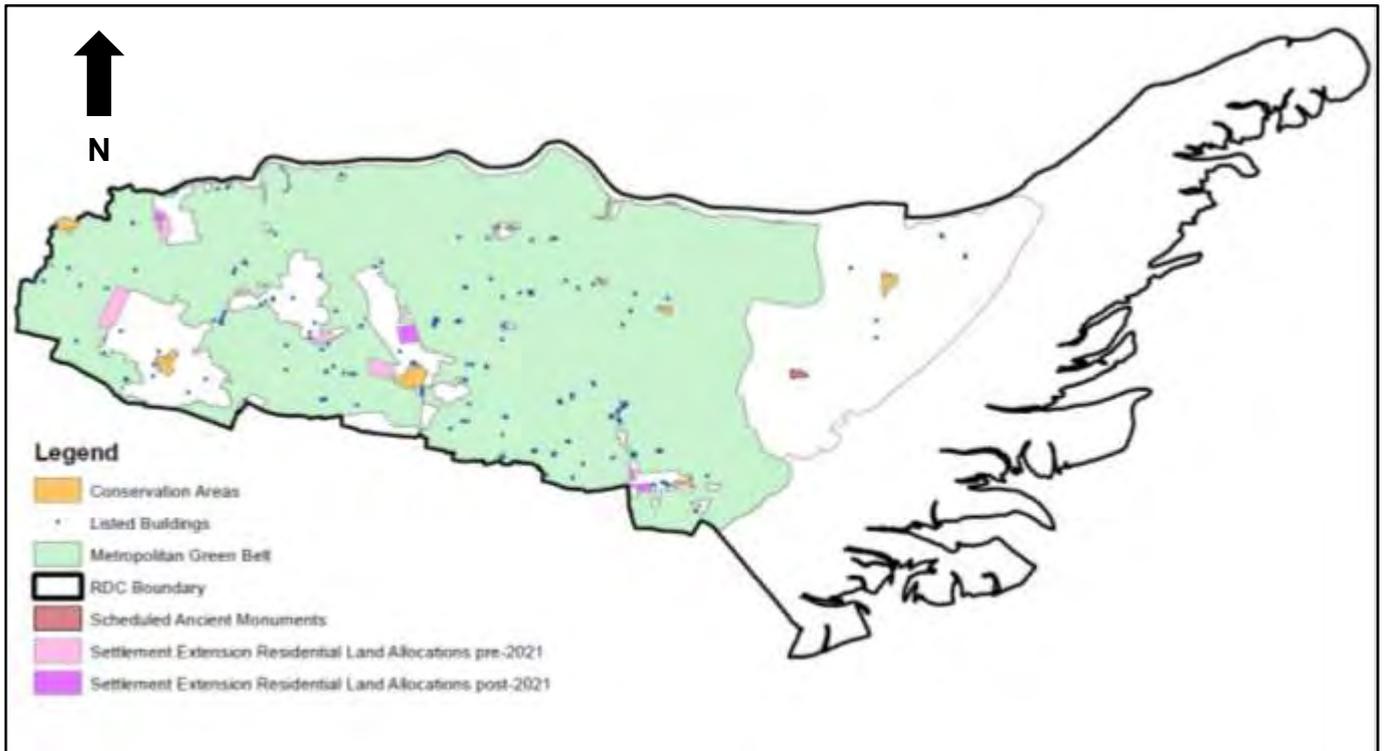
Our Communities

Key Community Characteristics:

➢ We have an estimated 85,144 people living in our district, with 57% of our residents of working age

➢ The proportion of our residents over the age of 65 is projected to grow significantly in the future, which means we have an ageing population

➢ We have a high level of owner occupation in our area, however affordability is a significant issue which follows nationwide trend of unaffordability

➢ Compared to the rest of Essex we have the lowest crime rate, and health and wellbeing are generally considered to be very high in our district

3.19   In 2011, our district was home to 83,287 people; this is estimated to have increased to 85,144 people in 2015 according to the Office for National Statistics. Our district's residents are unevenly distributed, with the majority located in the western extent within the towns of Rayleigh, Hockley and Rochford. The location of facilities and services across our district broadly reflects this distribution. The largest settlement in the district is Rayleigh which, in 2011, was home to 32,150 people (39% of our residents at that time). Table 1 below provides a breakdown of the district's population by parish.

Table 1: Breakdown of population by Parish from the 2011 Census

Parish	2011 Population	Parish	2011 Population
Ashingdon	3,634	Hullbridge	6,527
Barling Magna	1,740	Paglesham	246
Canewdon	1,473	Rawreth	1,126
Foulness	151	Rayleigh	32,150
Great Wakering	5,587	Rochford	8,471
Hawkwell	11,730	Stambridge	700
Hockley	9,616	Sutton	136
District Total			**83,287**

3.20   The proportion of residents aged 20 to 64 is expected to remain relatively stable over the next 20 years. However, our district has a higher proportion of older residents than the national and regional averages. The average age of residents in our district was 42.3 years in 2011, which is slightly higher than the average of 40.3 years recorded in 2001. Between 2014 and 2037 it is estimated that the number of residents over the age of 65 will increase by over 10,000, with a fairly even split between those aged 60/65 to 74, 75 to 84 and over 85. At present, approximately 57% of our residents are of working age, with 20% below the age of 19 and 23% above the age of 65. An increase in the older proportion of residents compared to the rest of the population has the potential to lead to a smaller workforce and higher dependency needs. A breakdown of the district's population by age group is shown in Figure 7 below.

Figure 7: Breakdown of Population by Age Group from 2011 Census
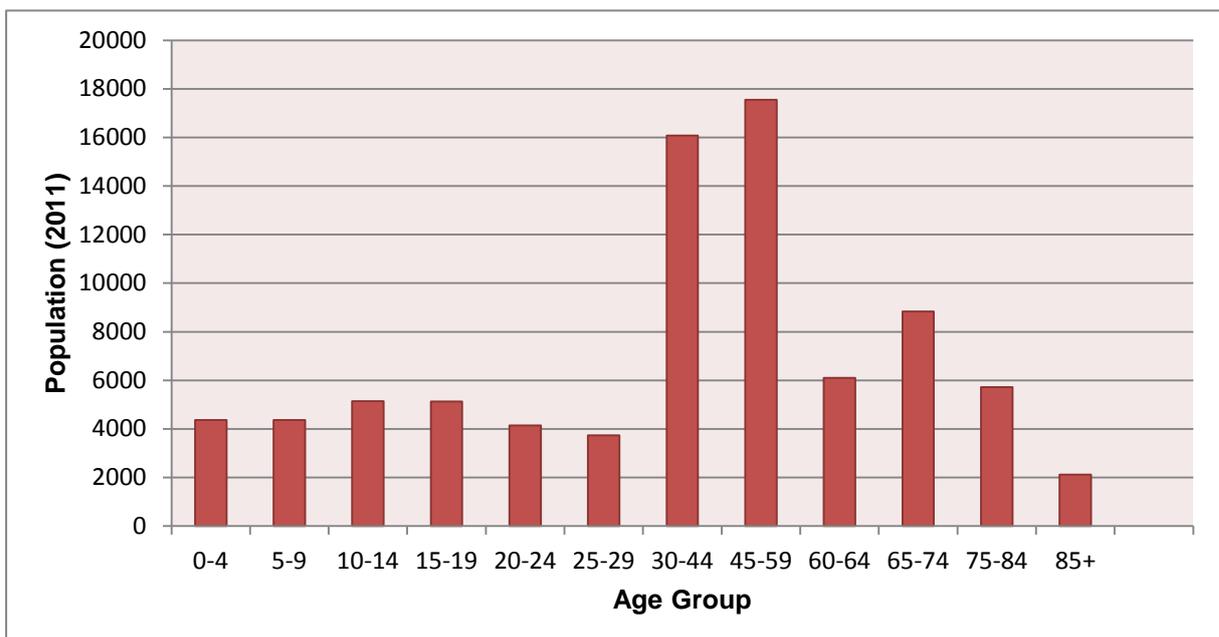
3.21   As a district we maintain a high proportion of owner occupied properties with 83% of households living in the owner occupied tenures, and compared to the rest of South Essex we have the lowest proportion of households, at 9%, living in the private rented tenure or living rent free. There were 34,444 households within our district in 2011, of which the predominant house type are detached and semi-detached dwellings, which comprise roughly 80% of total households. The majority of the remaining households consist of terraced dwellings, flats or maisonettes. The average value of a detached dwelling in June 2017 was £440,783 which is lower than the average price for the same property type in Essex (£644,446)[16].

3.22   Across South Essex there has been a long-term worsening in affordability, which is particularly pronounced in our district. This trend follows the national trend, and suggests that people working within South Essex would be required to spend a greater number of years' income on the cost of purchasing a home in the area where they work. As of July 2017 there are also 893 households on our Housing Waiting List – these are those residents most in need.

3.23   There are a number of schools and academies located within our district, including 22 infant, junior or primary schools and four secondary schools, all of which offer sixth form facilities. The combined numbers of students attending schools within the district was 12,302 in 2016, which is projected to slightly increase to 12,674 by 2021[17], taking account of new homes that are likely be delivered by this time. In addition, 86% of children attending schools in our district attend a 'good' or 'outstanding' school, which is higher than the 84.3% for Essex as a whole.

3.24   Standards of health and wellbeing are generally very high in our district, which is ranked 281 out of 326 local authorities on deprivation (where 1 is the highest level of deprivation). Overall, 69% of Rochford District residents rate their general health as good which is just below the county average of 70%[18].

3.25   We have the lowest crime rate in Essex, with a crime rate of 34.3 per 1,000 people in the year up to September 2015. The rate of motor vehicle accidents in our district is also lower than the county and national averages at 35 per 100,000 people. In general, the majority of our residents feel safe during the day, and feel safer at night than the county average[19].

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[16] www.home.co.uk
[17] www.essex.gov.uk/Education-Schools/Schools/Delivering-Education-Essex/School-Organisation-Planning/Documents/CommissioningSchoolPlacesinEssex-2016-2021.pdf
[18] www.essexinsight.org.uk/Resource.aspx?ResourceID=382
[19] www.essexinsight.org.uk/Resource.aspx?ResourceID=382

4   Our Spatial Challenges

National Picture

4.1   At the national level there is a clear agenda for growth to address the historic under delivery of new homes to meet our country's needs and to support our future economic prosperity. For planning purposes this is enshrined in the *National Planning Policy Framework* (NPPF) published in 2012, followed by the *Planning Practice Guidance* (PPG) in 2014. Other relevant policy documents include the *Planning Policy for Traveller Sites* (PPTS) and *National Planning Policy for Waste* (NPPW). The preparation of planning policies at the local level is at the forefront of the *NPPF* to ensure that the planning system principally remains plan-led where a Local Planning Authority – such as Rochford District – have their own locally specific policies that are up-to-date and in accordance with national planning policy and guidance.

4.2   The achievement of sustainable development is the primary thread that runs throughout the *NPPF*, recognising the mutual dependency between key environmental, economic and social considerations. Paragraph 14 of the *NPPF* establishes the presumption in favour of sustainable development, for both plan-makers and decision-takers. This approach seeks to encourage a positive approach to balancing the need for new homes and jobs against other considerations set out in the *NPPF* to deliver national growth aspirations and speed up the planning system.

4.3   The Government has also set up 39 partnerships (Local Enterprise Partnerships) across the country to determine economic priorities within specific areas, investing in and delivering projects that will drive growth and create new jobs locally. These are business-led, public/private partnerships which cover extensive areas across the region. The South East Local Enterprise Partnership (SELEP) covers Essex, Southend, Thurrock, Kent, Medway and East Sussex and aims to drive economic growth[20]. SELEP has prepared a *Strategic Economic Plan* (due to be refreshed by the end of 2017) which sets out its ambitions to enable the creation of more private sector jobs, more new homes and invest heavily in accelerated growth, jobs and homebuilding through the Growth Deal. Through the Growth Deal, SELEP can direct Government monies towards specific projects across the LEP area – including schemes to deliver new homes, jobs and infrastructure – which can competitively demonstrate a growth return for the investment. A new business park in Rochford, for example, is being delivered with investment from SELEP to support the development of land for business and new local job opportunities.

4.4   In terms of growth the *NPPF*, supported by the *PPG*, sets out how Local Planning Authorities should work out how many new homes are needed within their area and plan positively for those new homes. In simple terms the need for new homes is calculated using a broad methodology across a Housing Market Area, and set out in a *Strategic Housing Market Assessment* (SHMA). As a Local planning Authority, we sit within the South Essex Housing Market Area. This is a 'policy off' position which means that it identifies what an area's unconstrained need is, irrespective of any constraints such as environmental capacity or infrastructure restrictions. It is then the responsibility of the plan-making process to identify whether an area can meet this need in full or whether it will need help from its neighbours. The *NPPF* paragraph 47

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[20] http://www.southeastlep.com

requires us to significantly boost the supply and choice of new homes; with our ability to demonstrate a rolling five year supply of land for new homes being a key requirement. The Government however is proposing to change the way that the need for new homes is calculated. As a Local Planning Authority, we will need to ensure that we deliver the right homes in the right places.

Challenge – how do we deliver the right choice of homes in a sustainable way that meets residents' needs?

4.5   Delivering new jobs and supporting business and inward investment are important considerations within the national planning agenda to support the country's economic growth. The *NPPF* identifies policies to deliver and support a strong and competitive economy, and emphasises that the planning system – both plan-makers and decision-takers – should place significant weight on the need to support economic growth. We need to identify the amount of new land needed for business within a Functional Economic Area, which is set out in an *Economic Development Needs Assessment* (EDNA). We sit within the South Essex Functional Economic Area, and have a close relationship with our neighbouring areas which have different, complementary strengths to us. Whilst the *NPPF* requires us to identify a clear strategy for delivering sustainable economic growth, facilitate new land for business development, support existing business sectors and plan for changes in sectors, and identify priority areas for regeneration and infrastructure investment, we must not over-burden investment in business.

Challenge – how do we deliver new jobs that residents can access?

4.6   Infrastructure is critical to support sustainable economic growth. The *NPPF* recognises that through plan-making, we need to need to work with infrastructure and service providers as well as Essex County Council and neighbouring authorities to deliver strategic and local infrastructure needs. This includes assessing the quality and capacity of infrastructure for transport (including sustainable travel choices), water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecasted demands. Given our location in South Essex, and our relationship with the strategic road and rail network, we need to work closely with our neighbouring areas to ensure that our plans across the sub-region take into consideration future projected growth in homes and jobs.

Challenge – how do we deliver infrastructure to support new homes and jobs?

4.7   The *NPPF* at paragraph 181 makes it clear that as a Local Planning Authority we have a Duty to Co-operate as part of the plan-making process. We must demonstrate how we have worked effectively and collaboratively throughout the plan-making process with a range of organisations (including neighbouring areas, and infrastructure and service providers) to ensure that any identified strategic and cross boundary issues have been addressed within their own local development plans. The Duty to Co-

operate is an important legal test – which is set out in the Localism Act 2011 – that we have to pass when preparing our plans. Guidance on how to apply the Duty to Co-operate is set out in the *PPG*, and how we as a Local Planning Authority have applied the requirements of the Duty are detailed within the *Duty to Co-operate Topic Paper 2017*.

> **Challenge – how do we work with our neighbours to meet the requirements of the Duty to Co-operate?**

South Essex Picture

4.8   Being part of the South Essex sub-region means that as a district we have a close relationship with our neighbouring areas. Sharing land boundaries predominantly with Southend, Castle Point and Basildon Borough Councils within South Essex, a land boundary with Chelmsford City and a marine boundary with Maldon District, means that we have a number of other authorities to engage with on issues that are strategic and cross boundary in nature. We have a long, successful history working with our neighbouring authorities, particularly in South Essex, to deliver on local planning matters as detailed within the *Duty to Co-operate Topic Paper 2017*.

4.9   As a district, we share a sub-regional Housing Market Area with Southend, Castle Point, Thurrock and Basildon Borough Councils; as identified in successive *SHMAs* – most recently the *2016 South Essex SHMA* and *2017 Addendum.* The SHMA also identifies that Rochford District sits within a local Housing Market Area with Southend and Castle Point Boroughs, as illustrated in Figure 8.

Figure 8: Local Housing Market Areas in South Essex (source: 2016 South Essex SHMA)
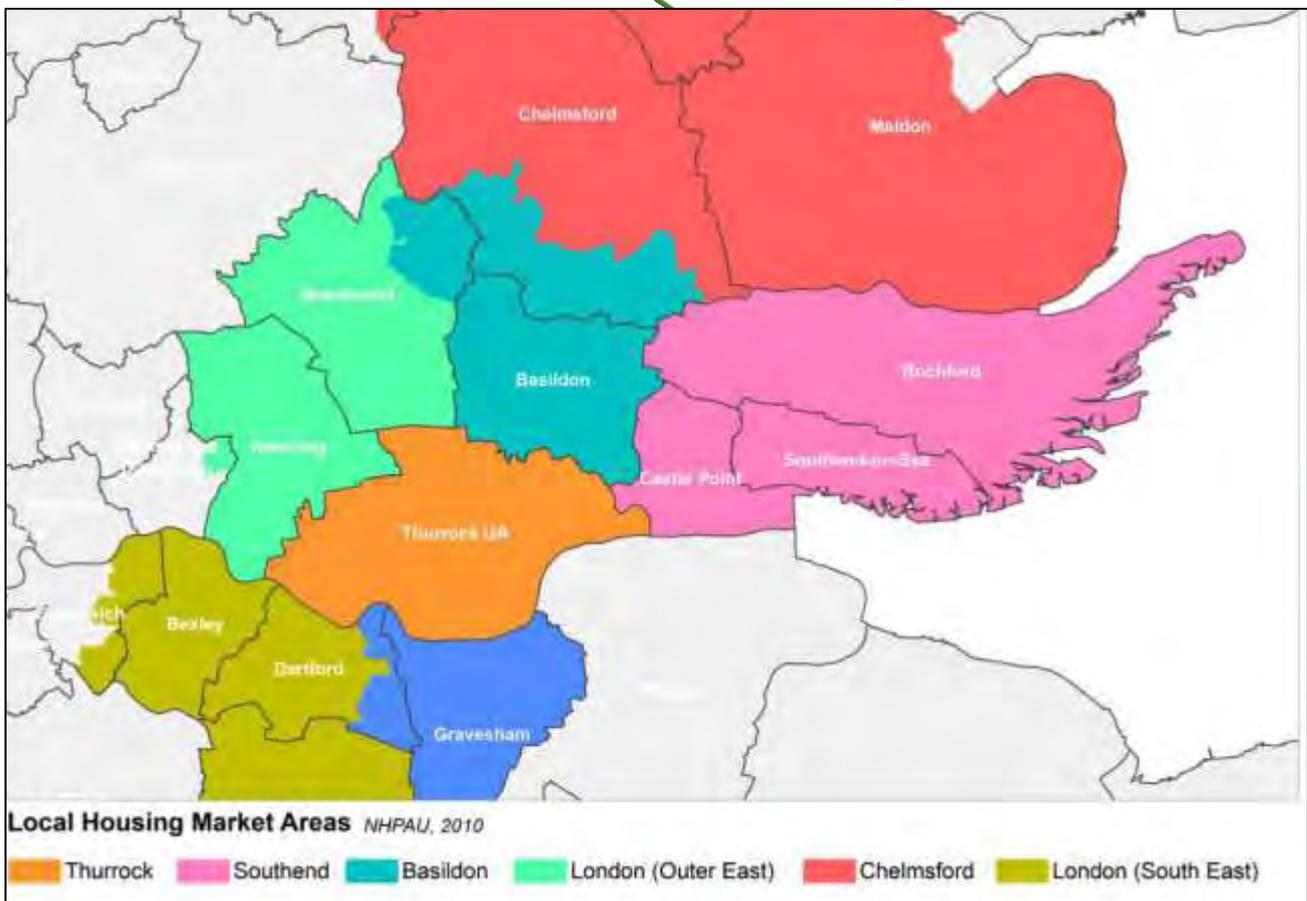
4.10 As part of the Duty to Co-operate, the five South Essex authorities and Essex County Council have signed a South Essex Strategic Planning Memorandum of Understanding (MoU) to provide a framework setting out the co-operation and engagement arrangements, roles and inter-relationships between the relevant authorities. The strategic, cross-boundary matters that have been agreed are:

- Housing (including Gypsy and Travellers)

- Economic Growth and Employment

- Retail

- Green Belt

- Climate Change

- Green Infrastructure/Green Grid

- Transport and Access

- Health and Well Being

- Minerals and waste

- Communications Infrastructure

4.11 Our neighbouring Local Planning Authorities however are at different stages of plan-making, and have their own challenges and opportunities.

Basildon Borough Council

4.12 Located to the west of our district, Basildon Borough has nearly 7,000 hectares of land designated as Metropolitan Green Belt, as identified in their 1998 Local Plan. The Borough covers an area of approximately 11,000 hectares and includes the urban areas of Basildon (including Laindon and Pitsea), Billericay and Wickford, with six villages and thirteen Plotland settlements. The A127 – which is a strategic route serving South Essex – runs through Basildon Borough, and the Council's enterprise corridor, which serves as an important driver for economic growth, is located on the southern boundary of this road. The Borough's population is served by two train lines; the London Fenchurch Street and the London Liverpool Street lines. The Council is working towards the submission (final) stage of its plan-making to deliver new homes, jobs and infrastructure need to support growth in the Borough. Basildon Borough Council is seeking to meet its own needs as far as possible, but has previously indicated that it may not be able to meet all its Gypsy and Traveller pitch requirements within its own boundary. It has also proposed improvements to the A127, including the delivery of a new junction and spur to link to the A130 in Rochford District. The Council anticipate that their pre-submission (final draft) version of their Local Plan will be published in early 2018.

Castle Point Borough Council

4.13   Some 56% of Castle Point Borough's land area is designated as Metropolitan Green Belt in their 1998 Local Plan – equivalent to 2,750 hectares – and is tightly drawn around the existing urban areas of Benfleet, Hadleigh and Thundersley. The Council's draft New Local Plan 2016 sought to meet a fraction of its need identified in the *SHMA*; with fewer new homes planned than previously on its Green Belt land. This approach however did not meet the legal requirements of the Duty to Co-operate however, as found by a Planning Inspector in January 2017 (further detail is provided in the *Duty to Co-operate Topic Paper*). If Castle Point Borough Council can effectively demonstrate that it is unable to meet all of its need for new homes within its own boundaries, it will need to work closely with neighbouring areas such as Rochford District to identify and agree an approach to delivering any potential unmet need. Similar to Rochford District, the Borough is served by the A13, A127 and A130, however, in terms of rail access the Borough is served by the London Fenchurch Street line. In terms of plan-making, the Council is still in the process of preparing its Local Plan following withdrawal of its submission (final draft) version in early 2017.

Chelmsford City Council

4.14   Chelmsford is the main settlement within the Council's administrative area with a number of smaller towns, villages and hamlets dispersed throughout. Nearly 38% of the Borough – located at the southern end of the City's administrative area – is designated as Metropolitan Green Belt. Chelmsford has not undertaken a comprehensive review of its Green Belt to date (as of July 2017), but has sought to deliver on its need for new homes and jobs in areas outside the Green Belt. Chelmsford City published its Preferred Options version of their Local Plan, which proposes to meet the city's needs (plus a 20% homes buffer to provide flexibility) within its own boundaries. Chelmsford city is served by a number of strategic roads, including the A130, which connects South Essex with the city, and the A12. North to south connectivity, particularly in terms of public transport provision, is limited and disjointed which does not make an attractive alternative to private vehicles. Chelmsford City Council are advanced in their plan-making and are anticipating on publishing their pre-submission (final draft) local plan in early 2018.

Southend Borough Council

4.15   Southend Borough is predominantly urban encompassing the settlements of Leigh, Chalkwell, Westcliff, Prittlewell, Southchurch, Southend, Thorpe Bay and Shoeburyness. However, of the 4,163 hectares of land area in the Borough, some 610 hectares is designated as Metropolitan Green Belt. Southend Borough is served by both the A127 and A13, and similar to Rochford District is constrained by the capacity of the strategic and local road network. The Borough is also served by the London Fenchurch Street and London Liverpool Street train lines. Given our location in South Essex we have a close relationship with Southend as an area, in terms of flows of residents to access jobs, schools, healthcare, open spaces and other facilities. The Borough's 2007 Core Strategy seeks to deliver the housing and employment needs set out in the East of England Plan up to 2025 whilst retaining the Green Belt around the urban area. The Council is at the early stages of its formal review of it local development plan, however it is possible that given its constraints it may be unable to meet all of its need for new homes and jobs within its own boundaries. As with Castle

Point, if this is the case Southend Borough Council will need to work closely with other Local Planning Authorities as part of the Duty to Co-operate to address any potential unmet need.

Rochford District Council

4.16   Our district consists of the three main towns of Rayleigh, Hockley and Rochford and the villages of Hullbridge, Canewdon and Great Wakering with a number of smaller settlements located within and outside the Green Belt. Our *Core Strategy* (adopted December 2011) identified a need to reallocate a small proportion of our Green Belt land to meet the need for new homes and jobs, as set out in the East of England Plan up to 2025. The *Allocations Plan* (adopted February 2014) subsequently allocated a number of specific sites to meet this need. Over 74% of the District's land mass remains designated as Green Belt land, excluding Foulness Island. Similar to other areas in South Essex we are served by a number of strategic roads, including A130, A127 and A13, with capacity limitations and a constrained local road network. Given the rural nature of the district, public transport provision can be limited. London Southend Airport and a new Airport Business Park are located within our district, acting as catalysts to support local economic growth.

Thurrock Borough Council

4.17   The Borough extends across an area of 16,500 hectares; over 65% of which is designated as Metropolitan Green Belt. There are several main settlements in the Borough, including Grays and Tilbury, with a number of smaller villages and several major developed sites located in the Green Belt. The Council's Core Strategy (adopted December 2011) seeks to protect the Green Belt whilst permitting a limited number of site-specific releases to meet housing, education and employment needs where necessary over the plan period. Thurrock Borough Council is at the early stages of plan-making, with an Issues and Options Part 1 published in early 2016. A delay in a decision on the preferred route of the Lower Thames Crossing has contributed to a delay in progressing the Council's Local Plan, however this has now been determined. The Borough benefits from its close proximity to London, links to the strategic road network (such as the M25) and the presence of Tilbury Docks, London Gateway and Intu Lakeside which serve to drive economic growth.

> **Challenge – how do we work with our neighbouring areas to address strategic, cross boundary issues, and in particular any unmet need for new homes and jobs?**

Relationship with London

4.18   Given our district's proximity to London, we need to be mindful of the city being a significant attractor for employment for those living in South Essex and therefore the need for some residents to commute. As a Housing Market Area, South Essex will have its own need for new homes and jobs to meet, and so will London. The most recent London Plan is going through a process of review with *A City for All*

Londoners[21] being consulted on in 2016. One of the key challenges will be ensuring that London as a city takes a positive and proactive approach to meeting as much of its own needs within its own boundaries as far as possible. A proportion of London is designated as Green Belt, and so as a South Essex Local Planning Authority we need to work closely with the Greater London Authority in the review of the new homes and jobs needed for London through the Duty to Co-operate.

> **Challenge – how do we work with other areas, such as London, to address strategic, cross boundary issues, and in particular any unmet need for new homes and jobs?**

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[21] www.london.gov.uk/sites/default/files/city_for_all_londoners_nov_2016.pdf

5   Our Vision and Strategic Objectives

Introduction

5.1   The vision for the district will form an important starting point for the new Local Plan, and it will be used as a measure of how successful the overall strategy for the district has been. It is therefore vital that the vision includes a number of realistic aims and aspirations that we, collectively, have been looking over the next 20 years in order to deliver the strategic priorities and needs of our local communities across the district. As part of this we need to identify at the high level what our strategic objectives are that we are planning to achieve.

5.2   Our *Business Plan* sets the four main priorities for the Council from 2016 to 2020: become financially self-sufficient, early intervention, maximise our assets, and enable communities[22]. These priorities can be achieved through putting residents at the heart of everything that we do and, for example, supporting new and existing businesses, helping the district become renowned as a leading regional centre in the science, medical and technology sectors within the next 10-20 years and making the most of our coastal areas.

5.3   The new Local Plan will be a key driver in delivering the *Business Plan*, and the vision and strategic objectives will need to reflect this. The vision in the current local development plan sets the overall strategy for the development of the District up to 2025, and this will need to be taken into consideration when looking beyond this timeframe. Once decided, the vision and strategic objectives can then be translated into policies which will clearly set out how our land and open spaces are used in the future.

Our Current Vision

5.4   The overall vision in our *Core Strategy* states that the plan seeks: 'To make Rochford District a place which provides opportunities for the best possible quality of life for all who live, work and visit here'. This broad vision is supported by a more detailed vision for the district which is divided into short, medium and long term. For each theme addressed in our *Core Strategy*, the vision and objectives for that topic have also been set out. Together, these all contribute to the overall vision for the district. The vision and objectives for each theme are divided into short, medium and long term aspirations reflecting the topics of the policies within each chapter. Where possible these are area or site specific to reflect local circumstances.

Our Future Vision

5.5   Our *Business Plan* will play an important role in informing the overall vision although the new Local Plan will need to look further forward ahead beyond the next 10 years. The vision will need to be aspirational but also achievable to ensure that it remains both meaningful and realistic. The overall vision will set the context and guiding principles for the policies that will be included in the new Local Plan in order to ensure that appropriate and coherent policies are implemented.

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[22] www.rochford.gov.uk/business-plan-2016-20

5.6   The current detailed vision in our *Core Strategy* provides a solid foundation for the vision for the new Local Plan but we recognise that it is in need of updating. The current vision gives an idea of what could be included, however the vision for the new Local Plan could include all, none, or some elements of the current vision. It should be positive, locally specific and address a number of key themes.

What you have told us so far

5.7   Parish Plans set a vision for the local community, based upon the views held by those residents living within a Parish. To date there have been four Parish Plans produced within the district, all looking to influence plan making within their respective areas. Parish Plans have been produced for the following areas: Great Wakering (2015), Hullbridge (2012), Hawkwell (2011) and Hockley (2007). During the community engagement workshops that were held within the parishes between May and October 2016 we also sought to draw out ideas for a vision for each area.

5.8   Key concerns and ideas that have been drawn out from the Parish Plans, workshops and the wider community survey, include:

- Improvements to services and utilities

- Concerns about the number of new homes

- Supporting local employment opportunities, particularly in rural areas

- Developing sustainable transport options such as cycling and walking

- Improvements to the strategic infrastructure network

- Sustaining local schools

- Protecting important views

- Improving local and regional awareness of Wallasea Island

Drafting Our Vision

5.9   We have drafted a vision for our district which sets out where would like to be as an area by 2037.

Our Draft Vision for 2037

"Rochford District is 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.**"**

5.10   This high-level draft vision is supported by key themes which we aim to deliver over the next 20 years. These are aspirational, seeking to capture a wide range of issues and opportunities, yet realistic, and will feed into our strategic objectives – how we will achieve the vision.

3.43

Rochford District, 2037

Our Economy

"We have made the most of our easy access to London, close proximity to neighbouring commercial hubs, connectivity to London Southend Airport and become a key destination to do business. We have also supported the delivery of a leading regional centre in the science, medical and technology sectors at the Airport Business Park. We have worked with Essex County Council and other infrastructure and service providers to deliver meaningful improvements to areas of concern to businesses. We will be recognised as an entrepreneurial and enterprising area, continuing to build on our existing strengths to nurture and support our start-up, small and medium sized businesses and strengthening our rural economy through enabling diversification of activities to provide a viable green tourism offer. We have vibrant and distinctive town and villages centres that continue to meet the shopping and leisure needs of our residents. We have invested in our local education facilities and skills development to enable residents to work locally and reduce the pressure on our transport infrastructure."

Our Environment

"We continue to be recognised as a largely rural area, with many accessible and high quality open spaces and significant stretches of coastline providing attractive and accessible leisure opportunities throughout our district along the rivers Crouch and Roach for our residents and visitors to enjoy. We have supported the development of the RSPB's Wallasea Island Wild Coast Project as the largest and most significant wetland project in Europe. We have protected and, where possible, enhanced our built, historic and natural environment, providing a network of locally, nationally and internationally important assets that are valued. We have retained our open character and extensive Metropolitan Green Belt designation, whilst providing for the needs of future communities, as far as possible. We have ensured that new homes and commercial premises respect local character and distinctiveness, are built to high environmental and design standards and incorporate measures to adapt to the impacts of climate change."

Our Society

"We have an extensive social, health, physical and green infrastructure network across our district which has been enhanced to support our changing population, and delivers health, well being and quality of life benefits for our residents. We have made efficient and effective use of suitable and available land to deliver new homes and jobs, focussing on delivering previously developed land first as a priority, including making appropriate use of our own public assets. We have ensured the delivery of a wide size and tenure of new homes which meets the needs of residents, and is supported by a range of infrastructure necessary to mitigate potential impacts on communities. We have worked with Essex County Council and other infrastructure and service providers to ensure that appropriate facilities are delivered to support strong and sustainable communities, and provide residents and visitors with choice about how they live, work and travel."

3.44

Drafting our Strategic Objectives

5.11   Paragraph 158 of the *NPPF* sets out strategic priorities which are the high-level national planning policy principles that are considered to be of key importance in order to deliver effective local planning policies. It is within this context that we have drafted a number of strategic objectives which are more specific and set a clearer picture of the potential direction of our future policies in light of our draft vision.

Strategic Priority 1: The homes and jobs needed in the area

Strategic Objective 1: To facilitate the delivery of sufficient, high quality and sustainable homes to meet local community needs, through prioritising the use of previously developed land first and working with our neighbours in South Essex.

Strategic Objective 2: To plan for the mix of homes needed to support our current and future residents, in particular viably addressing affordability issues and supporting our ageing population.

Strategic Objective 3: To build on the existing strengths of our local economy, effectively plan to meet changing business needs and strengthen our competitiveness through supporting our new and expanding home grown businesses, facilitating the delivery of more local job opportunities, enabling rural diversification and encouraging inward investment.

Strategic Objective 4: To facilitate accelerated growth in our local economy through supporting the delivery of suitably located land which meets businesses needs at each stage of their lifecycle (including delivering grow-on space to enable local businesses to flourish), the continued functioning of London Southend Airport as a thriving regional airport, serving London and the South East, as well as supporting the continued growth and innovation at the Airport Business Park.

Strategic Objective 5: To enable the upskilling of our residents to match skills with local job opportunities by supporting the provision of accessible, modern and good quality schools, higher and further education and bespoke training facilities to meet the expectations of employers and our local workforce.

Strategic Objective 6: To ensure that all new homes and commercial premises are built to the highest attainable quality, design and sustainability standards.

Strategic Priority 2: The provision of retail, leisure and other commercial development

Strategic Objective 7: To support the vibrancy, vitality and distinctiveness of our local town centres through planning to meet local niche shopping and leisure needs in Rayleigh, Hockley and Rochford.

Strategic Objective 8: To support the continued use and sustainability of our village and neighbourhood centres which serve the local need of current and future residents.

Strategic Priority 3: The 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 Objective 9: To ensure that all new homes and commercial premises are supported by appropriate, timely and necessary infrastructure to mitigate potential impact, including those relating to transport, utilities, telecommunications (including broadband), open spaces and greenways, flood risk, education, health and other community facilities.

Strategic Objective 10: To work with our neighbouring authorities in South Essex and beyond, and Essex County Council, as the highway authority for our district, to deliver meaningful improvements to the strategic and local highway network.

Strategic Objective 11: To facilitate a change in the way residents travel through encouraging walking, cycling and the use of passenger and public transport – and interchanges between them – reducing out-commuting wherever possible, and ensuring that all new homes and commercial premises are in accessible locations offering a choice of ways to travel sustainably both locally and within the wider network.

Strategic Objective 12: To plan for effective waste management by encouraging adherence to the waste hierarchy, working with Essex County Council to make best use of mineral deposits, supporting renewable energy generation and energy efficiency as part of all new homes and commercial premises developed, as well as supporting efficient water use.

Strategic Objective 13: To plan for effective flood risk and coastal change management across the district and working with Essex County Council as the Lead Local Flood Authority, Anglian Water, and the Environment Agency in the delivery of improved drainage infrastructure and sustainable drainage solutions.

Strategic Priority 4: The provision of health, security, community and cultural infrastructure and other local facilities

Strategic Objective 14: To work with Essex County Council and healthcare providers to ensure that our district's residents have access to good quality social and health and well-being services.

Strategic Objective 15: To protect and enhance leisure, sport, recreation and community facilities and to support the delivery of a multi-functional green infrastructure network across our district and along the coastline, connecting to neighbouring areas in South Essex and beyond, to promote healthy and active lifestyles, and improve physical and mental health and well-being.

Strategic Objective 16: To support the development and promotion of our cultural and environmental assets, and diversification of rural activities, to strengthen our district's green tourism offer as a complement to neighbouring areas.

Strategic Objective 17: To ensure that all new developments and the public realm are well designed and safe environments by balancing the principles of Essex design guidance with designing out crime and designing in community safety.

Strategic Objective 18: To support the timely delivery of suitable primary, secondary, higher and further education facilities, and early years and childcare facilities, working in partnership with Essex County Council and other education providers.

Strategic Priority 5: Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape

Strategic Objective 19: To protect, maintain and enhance our district's natural environment, geology and biodiversity, including our open spaces, recreational areas and our extensive coastline, as well as support wildlife, to create habitat networks and reduce fragmentation.

Strategic Objective 20: To ensure that our district's Green Belt continues to serve its five purposes, in particular retaining the openness of the area, protecting valued landscapes, such as the Upper Roach Valley and our coastal areas, retaining the physical separation between our towns and villages, as well as those in neighbouring areas of South Essex and beyond.

Strategic Objective 21: To preserve and enhance the quality of our district's built and historic environment, including within our 10 Conservation Areas, by promoting high quality design that responds to local character and distinctiveness to create a sense of place.

Strategic Objective 22: To mitigate and adapt to the forecasted impacts of climate change, including the water environment, air quality, biodiversity and flooding, support more efficient use of energy and natural resources and facilitate an increase in the use of renewable and low carbon energy facilities.

Tell Us More: What do you think the new Local Plan should be trying to achieve, and why?

6   Delivering Homes and Jobs

Strategic Priority 1: The homes and jobs needed in the area

Introduction

6.1   Ensuring that we deliver high quality, accessible homes and jobs for the future needs of our communities, where they feel safe, secure and valued and are supported by appropriate infrastructure, is central to ensuring the health and well-being of our district.

6.2   The delivery of new homes to meet future needs is a challenge that local authorities planning departments, as well as landowners and developers, must face head on and address through the plan-making process. Local authorities are required to ensure that there is enough land identified for new homes throughout their areas to meet the needs of all local communities; including open market homes, affordable homes, and specialist homes for those with greater support needs, and the travelling community. Throughout the programme of early community engagement in 2016 concern was raised about the number of new homes that have already been planned for up to 2025 which are in the process of being, or have been, delivered, and the potential impact of any future provision. Any new homes should be supported by proportionate and suitable infrastructure to sustain them, which does not impose an unnecessary burden on the capacity of existing infrastructure.

6.3   Being within easy commuting distance of key employment locations such as Southend, Basildon, Chelmsford and London provides local communities in the district with a wide choice of job opportunities. A challenge for the district, however, is attracting and retaining businesses to provide local employment opportunities for local people. Whilst some residents may not wish to live and work in the same area, in the interests of sustainable development we need to seek an appropriate balance between jobs and homes to provide greater choice to local people. This in turn can reduce the need to commute out of the district for some residents. Matching skills with jobs is also critical to provide local people with the right skills to take up local job opportunities; this includes supporting apprenticeships, education, skills development and other training. Providing local employment opportunities and supporting a range of businesses throughout the district was raised through the early community engagement we undertook in 2016. Ensuring that we meet the needs of local communities is important.

6.4   The rural nature of our district compared to some of our neighbours also provides opportunities for diversification of traditional rural activities to, for example, explore the merits of green tourism. If sensitive and appropriate to our environmental assets, this may lead to sustainable rural economic growth. The links, however, between key infrastructure, such as broadband, and tourism were raised through the early community engagement programme in 2016. Any activities need to respect the environmental and open characteristics of the area, particularly in relation to the Green Belt. The history embedded in our towns and villages, and our distinct heritage as a whole, also provides opportunities to develop heritage tourism – whilst being sensitive to the historic importance of these areas. This can strengthen the role that

the district plays in South Essex in delivering quality benefits for our residents through economic growth.

Need for Market, Affordable and Specialist Homes

Tell Us More SP1.1: We have a real and identified need for affordable homes in the district and an ageing population, so how do we sustainably meet our need for market and affordable homes, and homes for older people and adults with disabilities over the next 20 years?

Where are we now?

6.5   There is a national requirement to ensure that enough homes are planned for and delivered to meet local needs, at least over the next 20 years. The current policy in the *Core Strategy* and *Allocations Plan* sets out how the district plans to meet the need for new homes – both market and affordable – up to 2025. The target of 250 homes per year planned for in current policy is based on a regional plan called the *East of England Plan,* which was published in 2008. The *East of England Plan* was withdrawn in January 2013 however, which means that the adopted housing target needs to be reviewed in line with the *NPPF* and *PPG* to ensure that it seeks to meet future needs. Figure 9 illustrates the net number of new homes delivered for the last ten years.

Figure 9: Net housing completions 2006/7 – 2016/7
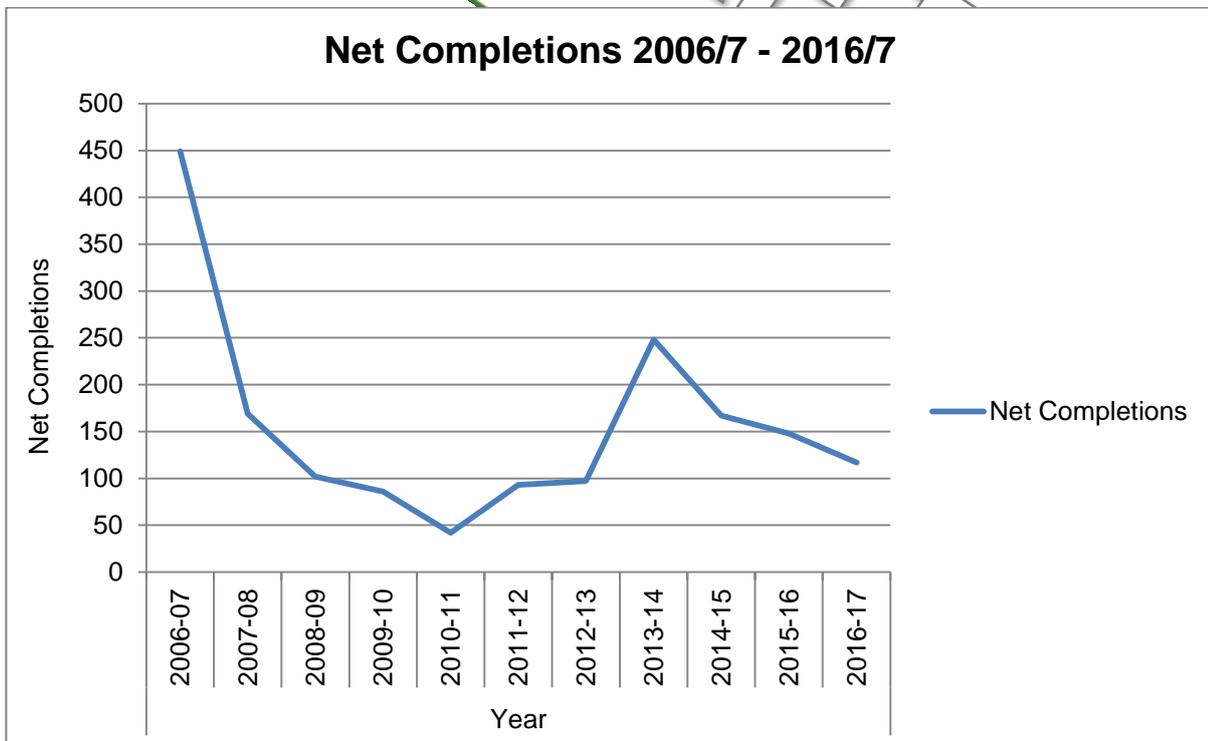
6.6   For the purposes of planning for future housing need, the *NPPF* and *PPG* requires Local Planning Authorities to undertake a *Strategic Housing Market Assessment* (SHMA) to objectively assess what the unconstrained need for new homes is within a Housing Market Area. The *PPG* sets out guidance on the steps that need to be

undertaken to prepare a *SHMA*. Rochford District sits within the South Essex Housing Market Area alongside Basildon, Castle Point, Southend and Thurrock Borough Councils. The five Councils have worked jointly in the past to prepare a *SHMA*, and together commissioned a more up-to-date *SHMA* to meet the requirements of the *PPG*. The primary aim of the *SHMA* is to determine an objective need for market and affordable homes, and homes for older people and adults with disabilities, as well as care homes across South Essex.

Objectively Assessed Need (OAN)

6.7 The *PPG* sets out the broad approach for calculating the need for homes in the future – often referred to as 'objectively assessed need' (OAN). The OAN includes a calculation for market and affordable homes, and homes for older people and adults with disabilities. It does not, however, include specialist communal accommodation in for the form of care homes; these are considered separate and in addition to the OAN. The most recent *South Essex SHMA* was published in May 2016, and updated in June 2017 to reflect more up-to-date national household projections, as required by the *PPG*. The calculation of an OAN range has taken into consideration demographic projections of housing need as well as the likely job growth that could be supported, (based on emerging outcomes within the *South Essex Economic Development Needs Assessment 2017 (EDNA)*), changes to market signals relating to housing supply and demand, which includes several assumptions such as household formation rates.

6.8 The revised OAN projects that the need for homes up to 2037 in our district is expressed as a range of between 331 and 361 homes per year, which takes account of any past under delivery up to 2014 (the base date of the new projections). This need sits within the context of the wider South Essex Housing Market Area, and the local Housing Market Area which Rochford District shares with Castle Point and Southend Borough, as identified in the *South Essex SHMA* 2016. Table 2 below sets out the number of new homes needed across South Essex over a 20 year period.

Table 2: South Essex Housing Market Area – OAN for new homes (Source: *South Essex SHMA Addendum 2017*)

Local Authority	Homes per year (OAN)	Total Homes (over 20 years)
Basildon	972 – 986	19440 – 19720
Castle Point	311	6220
Rochford	**331 – 361**	**6620 – 7220**
Southend	1072	21440
Thurrock	1074 – 1381	21480 – 27620

6.9 The OAN is not, however, the housing target for our district; it is a starting point and effectively a 'policy-off' view of need. The *PPG* recognises that potential constraints such as environmental capacity, land availability, development viability, infrastructure

capacity and other considerations set out in the *NPPF* will need to be taken into consideration when setting an appropriate and achievable housing target for our district.

6.10 The 2017 SHMA Addendum calculates Rochford District's Objectively Assessed Housing Need (OAHN) as being between 331 and 361 homes per year. This equates to a total of 6,620 to 7,220 of new homes between 2017 and 2037 (Table 3). However, as this OAHN uses a 2014 base date, we also need to take into account any shortfall in housing delivery against our need to date. The figure below sets out our baseline housing needs for the period 2017 to 2037, taking into account any existing shortfall against our OAHN. It should be noted, however, that our OAHN is a measure of our housing needs, but it is not equivalent to our future housing target, as it is for the Local Plan to establish how many new homes can actually be delivered given the constraints of the district.

Table 3: Projected housing need 2017 to 2037(SHMA Addendum 2017)

		Objectively Assessed Housing Need (SHMA Addendum 2017)	
		331 homes per year (lower end of range)	361 homes per year (upper end of range)
Projected need	**Baseline need (2017-2037)**	6,620	7,220
	Baseline need (2017-2037) plus shortfall from 2014	7,181 (shortfall of 561 homes)	7,871 (shortfall of 651 homes)

6.106.11 The Government has also issued a consultation document[23], called *Planning for the Right Homes in the Right Places*, in September 2017 which proposes changes to how housing need (including affordable housing need) is calculated by local planning authorities. Although the changes to the method are still at the consultation stage; this proposed method recommends a figure of 362 homes per year as the district's need for new homes. However, the results of this consultation will feed into the next stage of our emerging Local Plan.

Affordable Homes

6.116.12 Affordability, which is the difference between the cost of homes and wages, highlights the importance of providing a range of housing products to meet needs. Affordability can be measured by comparing the lowest 25% of earnings to the lowest 25% of house prices, which gives an affordability ratio. The *South Essex SHMA 2016* highlights that in 2014 the affordability ratio for our district was 9.7, which was the highest in South Essex, and is substantially higher than the England average of 6.9.

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[23] www.gov.uk/government/consultations/planning-for-the-right-homes-in-the-right-places-consultation-proposals

Affordability is, therefore, a significant concern in South Essex, which needs to be addressed. The *2017 Addendum* identifies that there is a need for around 296 affordable homes per year up to 2037 in our district, however, it recognises that full affordable housing need is unlikely to be viable, as across South Essex this equates to a significant proportion of the overall need. It has also been confirmed in the High Court that the *PPG* does not require the OAN to meet the need for affordable homes in full.

6.126.13   The *Core Strategy* requires affordable homes to be delivered as a proportion of the housing capacity of sites. Across South Essex there is an issue of providing affordable homes to meet local needs. Current policy in the *Core Strategy* (policy H4) requires that at least 35% of dwellings on all developments of 15 or more units or on sites of half a hectare or more need to be affordable, subject to viability. The Council no longer delivers its own affordable housing however; in 2008 all the Council's stock was transferred to Rochford Housing Association to manage, in consultation with the Council. Since the *Core Strategy* came into effect in December 2011, a total of 257 affordable homes have been delivered to meet local needs as of 27 October 2017.

Homes for Older People

6.136.14   Homes for older people (those over the age of 75) forms part of the OAN for our district, as they are likely to be private accommodation. This includes Essex County Council's Independent Living Programme, sheltered housing and extra-care housing. The *South Essex SHMA Addendum 2017* identifies that there is a need for **50** specialist private homes for older people per year over the period 2014 to 2037. However the number of residents applying for traditional forms of sheltered accommodation is decreasing; so it may be that a number of our existing units could be refurbished rather than requiring new homes.

Homes for Adults with Disabilities

6.146.15   Those aged 74 years and under may also require more support to meet their needs, and Essex County Council as the social services provider are encouraging the provision of independent living units for those adults with disabilities, so that they can continue to live healthy and active lives within existing communities. The projected need arising over the plan period up to 2037 is set out in Table 43 below. This equates to an average need of 62 homes/units a year for adults with disabilities as identified in the *South Essex SHMA*. These households are included within the OAN as they are assumed to continue to occupy private housing. We have very few adapted affordable homes and, as a Local Authority, we are receiving more approaches from residents who are either privately renting or own their properties who cannot or are not able to adapt their current residence.

Table 43: Modelled Growth in Private Household Residents with Support Needs 2014 – 2037 (Source: *South Essex SHMA 2016*)

Change in residents with support needs in Rochford District			Total change
15 yrs and under	16 yrs to 59/64	60/65 yrs to 74	2014 – 2037
86	249	1,086	1,421

6.156.16   Essex County Council's *Independent Living for Adults with Disabilities: Planning Position Statement 2016* estimates that, there is a need for 13 self-contained homes within a scheme, 17 shared homes, and 3 individual self-contained homes to be provided by 2020/2021. Meeting part M3 of the Building Regulations (wheelchair accessibility) is particularly recommended.

6.166.17   There is no longer a specific policy on providing for this need however. Our policy in the *Core Strategy* (policy H6) on providing Lifetime Homes is no longer applied due to changes at the national level with the introduction of the *National Technical Housing Standards*. There is, however, still a local policy requirement to provide 3% of homes that are wheelchair accessible on schemes of 30 homes or more, and at least one home on schemes between 10 and 30 homes. Other elements of the standard are now being interpreted by Building Regulation Part M4 (2).

What are the identified issues?

6.176.18   Our adopted *Core Strategy* housing target of 250 homes per year has been challenging to meet, particularly since the recession in 2007/2008. There have been a number of challenges to delivering sites, even on greenfield land, which have been largely outside our control. However, a number of brownfield sites have come forward to deliver in existing residential areas. The OAN for our district, identified in the *South Essex SHMA Addendum 2017*, nevertheless, is greater than this; there is therefore a requirement to deliver against this need, as far as possible, whilst also ensuring that any homes that have not been delivered in previous years are brought forward.

6.186.19   Affordability is a significant issue in the district, and across South Essex as a whole, which impacts on the ability of our residents to access new housing products. Affordable homes (both social and intermediate homes) is allocated based on those on our Housing Waiting List; this is different to market housing which is open to everyone to purchase, and could mean that the residents are unable to compete for local housing. As of 27 October 2017, there were 921 households on our Housing Waiting List. The affordability of homes in the district has been raised as a concern through the early community engagement programme, which we undertook in 2016. The provision of affordable homes is a challenge, however, with limited sites available to deliver against need, and in most cases in recent years there is a reliance on affordable homes being delivered as a portion of market homes across sites.

6.196.20   The current policy on affordable homes has delivered 257 social and intermediate (shared-ownership) products, which reflects our local housing need, as of 27 October 2017. The *Housing White Paper,* 'Fixing Our Broken Housing Market' published in February 2017, sets out the Government's view on affordability and how this can be tackled through the planning system. It has been proposed that the definition of affordable housing be widened to include starter homes and affordable private rent, for example. There is concern, however, that widening the definition to include starter homes and other products, would reduce the number of properties that are delivered and available for affordable rent – for those households on our Housing Waiting List who are most in need. Until these proposals have been fully considered, and integrated into national policy and guidance, there remains some uncertainty about the implications.

6.20<ins>6.21</ins>   The majority of these affordable homes have been delivered on larger greenfield sites, as meeting our policy requirement of 35% is more challenging on brownfield (previously developed) sites because of viability or deliverability issues. Viability is an issue that needs to be carefully considered when setting an affordable homes requirement for schemes. We have gathered evidence from 2010[24] on the viability of our current policy on the affordable homes threshold and requirement for development schemes. This found that most of the district has high property and land values and most new developments are potentially able to support a requirement for affordable housing of 35% of all homes provided.

6.21<ins>6.22</ins>   Any new policy will need to be flexible when considering schemes with the lowest land values in the district, or those with abnormal site costs (for example where land contamination needs to be dealt with). The *Housing White Paper* however has consulted on a national minimum threshold that Local Planning Authorities should except from developments – schemes of over 10 units or on 0.5 hectares or more, may be required to deliver at least 10% of all homes as affordable. The potential impact of this will need to be considered further through the development of viability evidence. Where developers tell us that they believe the affordable homes requirement in our policy will affect the viability of their development, we will consider – and robustly test – whether the requirements would make it unviable through independent scrutiny. In these cases where it can be evidenced, so that development is delivered, it may be necessary to allow the developer to vary the mix, tenure and number of affordable homes. This is an approach which has been taken on some sites which have been delivered in our district, to ensure that a particular scheme is not made unviable and undeliverable by this policy requirement.

6.22<ins>6.23</ins>   National policy specifically requires us to provide for those sections of the population which require more support such as older people and those with disabilities. Specialist accommodation forms a part of our wider new homes requirement identified in the *South Essex SHMA 2016*. There is currently no specific local policy that plans for the provision of specialist homes within local communities; as this is a requirement of *NPPF*, an appropriate housing mix policy needs to be addressed through the new Local Plan. The mix of homes needs to include information about the types that are expected to be delivered as part of market housing schemes; this includes affordable homes in addition to specialist homes. These further requirements for schemes may have an impact on viability of schemes, which may need to be factored into any policies.

6.23<ins>6.24</ins>   The *Housing White Paper* recognised that there are issues with Local Planning Authorities spending limited budgets on *SHMAs*, which establish their own – often complex – methods for calculating housing need, and recommended that a standard method is applied nationally to simplify the process. The potential options for a new standard methodology was published in September 2017 and consulted upon[25]. This indicated a marginal upward lift to the current higher end of the OAN range for the District. This is equivalent to one additional home each year – making the need 362 homes each year. The current local assessment of housing need in the *South Essex SHMA Addendum 2017* at the low end of the range is 331 homes each year. The

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[24] www.rochford.gov.uk/sites/default/files/planning_draft_affordable_housing_viability_assessment.pdf
[25] www.gov.uk/government/consultations/planning-for-the-right-homes-in-the-right-places-consultation-proposals

3.54

difference in the new methodology and the existing lower end of the range is an absolute change of 31 homes each year (around a 9% upward change). The results of the consultation are expected to inform a new England-wide standard methodology expected to be implemented from April 2018. Therefore, there is still uncertainty around housing need.

6.24 6.25   We are legally required to work with our neighbouring authorities – both in and outside our Housing Market Area – to look at any issues which affect more than one Local Planning Authority area such as housing need, infrastructure and jobs under the Duty to Co-operate. The Duty to Co-operate was introduced by the Localism Act in 2011. This means that, in relation to housing need, we need to work jointly across South Essex to meet the level of housing need which is determined within the *South Essex SHMA Addendum 2017.* Working together at this sub-regional level to address housing need, particularly where an area may be unable to meet its own need, is supported by national policy and guidance, but it presents another challenge to delivering much-needed homes in South Essex. This requirement is explained in more detail in the *Duty to Co-operate Topic Paper 2017.*

6.25 6.26   To support more effective joint working where planning issues need to be addressed by more than one Local Planning Authority, the Government intends to set out in a revised *NPPF* that all Local Planning Authorities should produce a Statement of Common Ground (SoCG). The objectives of the SoCG would be to:

- increase certainty and transparency, earlier on in the plan-making process, on where effective co-operation is and is not happening;
- encourage all local planning authorities, regardless of their stage in plan-making, to co-operate effectively and seek agreement on strategic cross-boundary issues, including planning for the wider area's housing need; and
- help Local Planning Authorities demonstrate evidence of co-operation by setting clearer and more consistent expectations as to how co-operation in plan-making should be approached and documented.

6.26 6.27   To meet these objectives, the Government are proposing that every Local Planning Authority produce a SoCG over the Housing Market Area or other agreed geographical area, where justified and appropriate. It is proposed that the statement will set out the cross-boundary matters, including the housing need for the area, distribution and proposals for meeting any shortfalls. In setting out the strategic cross-boundary issues, the statement will record where agreement has, and has not, been reached.

6.27 6.28   Any growth in the district has the potential to impact on the local environment. The *Environmental Capacity Study 2015* considers a range of environmental factors including air quality, climate change, land, soils, minerals, water (resources, quality and flood risk), biodiversity, and the health and well-being of people (landscape, recreation, cultural heritage and the historic environment). The *Environmental Capacity Study 2015* has identified those broad areas where there is potentially no or limited environmental capacity for additional new homes, and those broad areas where there are possibilities for further small scale sites to deliver new homes. The

delivery of new homes in the future has been raised as a concern through the early community engagement programme, which we undertook in 2016.

~~6.28~~6.29   Based on a target of 240 homes per year (taken from the *South Essex SHMA 2013*), between 2026 and 2031, i.e. beyond the current plan period of the *Core Strategy*, the *Environmental Capacity Study 2015* concludes that it is uncertain as to whether the district has the environmental capacity to accommodate this level of growth; and is unlikely to be able to accommodate additional homes from other areas. However, it notes that there would need to be more site-specific assessments of impact undertaken. We also need to be mindful of the requirements of the Duty to Co-operate, as set out in the *Duty to Co-operate Topic Paper 2017.* The Study recommends that site-specific studies should be undertaken to identify any small scale sites for new homes through infill and adjacent to the existing urban areas, particularly around the northern and western urban areas of the district. This may include an assessment of the Green Belt. The study, however, concludes that it is uncertain whether the cumulative impacts of even small-scale development of new homes would be acceptable.

What are the realistic options?

Objectively Assessed Need (OAN)

~~6.29~~6.30   Three options have been identified in relation to ensure that we – as far as possible within the context of national policy and guidance – meet our own needs, and work effectively with our neighbours to ensure that we, as a collective, address the need for housing in the South Essex Housing Market Area.

Option	Justification
A. Seek to provide as much of the district's housing need within our area, as far as possible, given environmental and other constraints.	There is a need to carefully consider whether the district can accommodate all our need, identified in the *South Essex SHMA*, given the environmental and other constraints such as Green Belt. Failing to provide for all our need, if there is no reasonable justification and evidence, would be contrary to national policy and guidance.
B. Work with neighbouring Local Planning Authorities to ensure that housing need across the South Essex Housing Market Area is effectively met.	Under the Duty to Co-operate, we are required to work together to ensure that housing needs are met. If we do not co-operate with other authorities, it is likely that any plan we produce would be found to be unsound. National policy and guidance advocates a plan-led system, so it is important to have an up-to-date plan in place, to avoid speculative schemes coming forward.
C. Consider a policy requirement to deliver a percentage of new	This would provide residents with the opportunity to access market housing as a priority on a percentage of new market homes. This approach would ensure that such housing would continue to meet the needs of residents

Option	Justification
market homes on schemes to be available to residents on a first-come, first-served basis for a limited period of time	wherever possible.

Affordable Homes

6.306.31   There are three options that have been identified for the affordable housing threshold. Increasing the threshold for the provision of affordable homes as part of a scheme is not considered to be reasonable as this is not in line with the potential direction of national policy and guidance, and would reduce the number of affordable homes being delivered.

Option	Justification
A. Reduce the threshold for the provision of affordable homes as part of a scheme (potentially in line with emerging national policy and guidance)	The threshold for providing affordable homes is currently a scheme of 15 or more homes, or on sites greater than half a hectare. This would mean that more schemes may be eligible to provide affordable homes to buy or rent. This could have an impact on viability of smaller sites, however.
B. B. Retain the current threshold for the provision of affordable homes as part of a development scheme	Schemes of fewer than 15 units would continue to be ineligible for providing affordable homes. Such schemes therefore would not contribute to meet local need for affordable homes; whether to rent or buy.
C. C. Do not have a policy threshold for the provision of affordable homes (potentially rely on emerging national policy and guidance to set the minimum threshold)	All new housing schemes, regardless of the number of homes proposed or the site size, would contribute to the delivery of affordable homes subject to viability. Where on site provision is impractical, we could accept a proportionate financial contribution instead to allow us to provide affordable homes elsewhere in the district. However site provision would potentially still be an issue.

6.316.32   There are two identified options for the proportion of affordable homes to be provided. Lowering the requirement is not considered to be a reasonable option as it would reduce the number of affordable homes that could be delivered – any policy would need to be caveated to take account of potential viability issues in any case.

Option	Justification

D. Retain the current affordable homes requirement of 35% where a scheme meets the prescribed threshold, subject to viability	The threshold and requirement for affordable homes varies across South Essex. However we need to ensure that the majority of future schemes can deliver as many affordable homes as possible without undermining the viability of any scheme.
E. Increase the proportion of homes that we require developers to provide as affordable housing, subject to viability	While this approach may be desired, realistically it may only be achievable on a select few sites. The viability of most sites may not support more than 35% affordable housing.

Homes for Older People and Adults with Disabilities

6.326.33   There are two options that have been identified for the provision of homes for older people and adults with disabilities.

Option	Justification
A. Continue the current approach to applications for specialist homes – on an ad hoc basis as applications are received based on available evidence	Although this approach should be effective and respond to needs in a timely manner as it would be based on available evidence; it does not ensure certainty for those requiring specialist homes and appropriately plan for provision in the future.
B. Include a policy on housing mix which requires the provision of specialist homes, such as wheelchair accessibility (part M Category 3), independent living units, sheltered and extra-care housing, over a certain threshold	This approach would provide certainty for the provision of homes to meet the needs of those specialist needs. This policy would replace *Core Strategy* policy H6 on Lifetime Homes which is no longer applicable.

Need for Care Homes

Tell Us More SP1.2: In addition to sustainably meeting our need for market, affordable and older person's homes over the next 20 years, how do we plan for care homes?

Where are we now?

6.336.34   Social services in the district are provided by Essex County Council. The district has an ageing population, similar to other parts of South Essex. Those older people, particularly aged 75 and over, requiring extra support in the form of residential homes or nursing homes, depending on the nature of the accommodation and the level of care provided, have a need in addition to the OAN. This is because such communal homes fall within a different planning use class to all other types of homes. It is projected that there is likely to be a need for an average of 11 bed spaces annually for those over the age of 75 living in care homes.

What are the identified issues?

6.346.35   The *NPPF* requires us to provide for older people needing additional support in addition to the need for other types of homes. Specialist accommodation forms a part of our wider housing requirement identified in the *South Essex SHMA 2016*. There is currently no specific policy that plans for the provision of this type of accommodation within local communities; as this is a requirement of national policy and guidance, an appropriate housing mix policy needs to be addressed through the new Local Plan.

What are the realistic options?

6.356.36   There are two potential options for providing care homes in the district.

Option	Justification
A. Continue the current approach to applications for care homes on an ad hoc basis as applications are received based on available evidence	Although this approach should be effective and respond to needs in a timely manner as it would be based on available evidence; it does not ensure certainty for those requiring specialist accommodation and appropriately plan for provision in the future.
B. Include a specific policy on the provision of care homes, and identify appropriate locations in conjunction with Essex County Council	This approach would provide certainty for the provision of care homes to meet the requirements of those with specialist needs; however this would need to be clearly evidenced in conjunction with Essex County Council.

Delivering our Need for Homes

Tell Us More SP1.3: How do we plan for and facilitate the delivery of our need for new homes over the next 20 years within the district?

Where are we now?

6.366.37   We need to plan for and facilitate the delivery of homes to meet a range of residents' different needs over the next 20 years. The *Core Strategy* sets out the plan

for delivering 250 homes per year up to 2025 through prioritising the reuse of brownfield (previously developed) land within the existing residential area, wherever possible, as set out in policy H1. It was determined through a detailed assessment of available land at the time that there would be insufficient land within the existing residential area to meet the need for new homes. Limited infilling and intensification of the existing residential area has been resisted, to an extent, in order to protect the character of settlements. A balanced strategy was determined to be the best approach to ensure that housing need was met across the district, and supported by appropriate infrastructure. This approach is supported by the settlement hierarchy set out in Table 4 5 below. It is recognised that whilst some settlements have their own distinct identities, they are not functionally separate from their neighbours. This primarily relates to the settlements of Rochford/Ashingdon and Hockley/Hawkwell.

Table 45: Rochford District's Settlement Hierarchy (Source: *Core Strategy 2011*)

Tier	Settlements
1	Rayleigh; Rochford/Ashingdon; Hockley/Hawkwell
2	Hullbridge; Great Wakering
3	Canewdon
4	All other settlements

6.37 6.38   The balanced approach to meeting need directs development to the higher tiers of settlements to reflect the fact that these settlements are characteristically more developed with a greater level of infrastructure and service provision than the smaller settlements, and therefore would provide more sustainable development. It was determined however that this balanced approach should be delivered through extensions to the existing residential area, which involved reallocation of a very small amount of our total land which is designated as Green Belt land (in the region of 1%). The *Core Strategy* identified nine strategic locations to meet housing need, as identified in policies H2 and H3; the specific sites allocated through the *Allocations Plan* (policies BFR1 to BFR4, and policies SER1 to SER9).

6.38 6.39   As a Local Planning Authority, we are responsible for monitoring the supply of land for new homes against projected delivery on a regular basis. The housing trajectory within our *Strategic Housing and Employment Land Availability Assessment* (SHELAA) *2017* sets out our most up-to-date situation on housing delivery against supply. This assessment also considers the suitability, availability and achievability of sites for the delivery of new homes over the next plan period. It is projected that there are potentially 38 sites, within the existing residential area, which may be appropriate to be considered for the delivery of 935 new homes.

6.39 6.40   We must make efficient and effective use of available land in line with national policy and guidance. We need to exhaust every opportunity to deliver our need for new homes on land that is not allocated as Green Belt land. In seeking to identify additional brownfield land that may have become available since the adoption of

current policies on land allocations, we have undertaken a 'Call for Sites' which invited anyone with an interest in land to submit it to us for consideration. We also need to be proactive in identifying sites within the existing residential area which may have the potential to deliver new homes. The sites that have been identified through the 'Call for Sites', and through this proactive approach, have been assessed for their suitability, availability and viability to be developed – in theory – to deliver new homes. This is included in the *SHELAA 2017.* Our ability to deliver new homes within the existing residential area means that there is less pressure to look at those areas outside, which are allocated as Green Belt land.

6.40 6.41   We have identified several brownfield sites outside the Green Belt which were considered appropriate for the development of new homes in the current adopted local development plan. National policy requires us to reconsider those sites that have been allocated but do not have planning permission; this includes the sites identified within *Core Strategy* policies BFR1 to BFR4, and policy SER8. The suitability of these sites has been considered further in the *SHELAA 2017.* Policy BFR1 and BFR4 have also been considered in the emerging *South Essex Economic Development Needs Assessment 2017 (EDNA).* The *SHELAA* reconsiders these brownfield sites, adding in other sites that have been submitted to us for consideration into the mix. Our town centre *Area Action Plans* also identify opportunity sites where new homes could be delivered on brownfield (previously developed) land within the town centres. *Hockley Area Action Plan,* for example, identifies that around 100 new homes could be delivered on the Eldon Way Opportunity Site as part of a mixed use scheme (Policy 4). The *Rochford Town Centre Area Acton Plan* and the *Rayleigh Centre Area Action Plan* identify smaller opportunity sites which could deliver additional homes within these locations.

What are the identified issues?

6.41 6.42   There is a recognised need to deliver a certain number of new homes within South Essex and within the district over the next 20 years as identified in paragraph 6.6, based on the *South Essex SHMA Addendum 2017.* Failing to plan for future growth would be contrary to national policy and guidance and would not meet the requirements of Duty to Co-operate which is a legal obligation on us as a Local Planning Authority. Without a plan in place which clearly sets out a viable and deliverable plan for meeting needs in the future, the district may be vulnerable to ad-hoc planning applications. Not planning for our future needs is not a realistic option that we, as a Local Planning Authority, can take. The *Housing White Paper* is clear that each area needs to effectively and proactively plan for new homes, and must be covered by an up-to-date plan. Areas that are not covered by an up-to-date plan, and Local Planning Authorities that are not progressing with plan-making, risk intervention from the Government.

6.42 6.43   Although we have undertaken a 'Call for Sites', which is open on an annual basis (April to March), at present there are insufficient sites within the existing residential area to accommodate the level of OAN for all types of homes identified in the *South Essex SHMA Addendum 2017*. Other sites which may become available over the next five to 10 years within the existing residential area may be promoted as the new Local Plan progresses, so we will aim to update the *SHELAA* on at least an annual basis. This is particularly important as national policy and guidance advocates that brownfield (previously developed) land is used before greenfield (undeveloped)

land and, ultimately, Green Belt. However, this is dependent on appropriate brownfield land being available in the quantity and at the time that it is required to deliver new homes. We will, therefore, keep our list of potentially available land under review to ensure that we identify all appropriate and available brownfield land within the existing residential area. The need to avoid the sterilisation of underlying geology across the district also need considerations (as detailed within the 'Protecting and Enhancing our Environment' chapter).

6.43 6.44   There may be sites identified in the Green Belt which can be classified as brownfield (previously developed) land, as defined by the *NPPF* (Annex 2):

"Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time."

6.44 6.45   The majority of the district is allocated as Green Belt land (see 'Protecting and Enhancing our Environment' chapter for more information on Green Belt policy). National policy and guidance places great weight on retaining the Green Belt; this view is reinforced in the *Housing White Paper*. However, the Green Belt needs be reassessed where other options for meeting our own housing needs, as set out in the *South Essex SHMA Addendum 2017*, have been exhausted – and amended in exceptional circumstances. This is a challenge across South Essex. We need to demonstrate that we have considered all the options before considering the Green Belt. However, when considering the Green Belt we will need to look carefully at how each parcel of land fulfils the five purposes of the Green Belt, as set out in national policy.

6.45 6.46   The choice for residents occupying new homes to travel using a range of different transport modes (buses, trains, walking or cycling) to key destinations (local services, facilities and jobs), particularly for those who are less affluent or who may not have access to a private vehicles, is important. This will reduce inequalities and have a positive impact on health and well being of residents, with the potential for wider benefits for the environment through reduced congestion and air quality issues. Sustainable travel is considered in more detail in the 'Delivering Infrastructure' chapter.

6.46 6.47   Other issues such as environmental capacity, as assessed in our *Environmental Capacity Study 2015,* and impact on infrastructure need to be taken into consideration when assessing our ability to meet our housing need. Our current position in relation to infrastructure provision for the current plan period (up to 2025) and how we plan to work with service providers in the future is detailed within our *Infrastructure Delivery Topic Paper 2017.*

What are the realistic options?

6.47~~6.48~~ There are six potential options that could provide a realistic strategy for delivering new homes – a combined approach could be considered, if required.

Option	Justification
A. Increase density within the existing residential area – which would require an amendment to our current density policy	National policy encourages the effective use of brownfield (previously developed) land, provided it is not of high environmental value (*NPPF* paragraphs 17 and 111). Land within the existing residential area could deliver more homes – particularly in proximity to town centres and sustainable transport hubs – provided this would not have a detrimental impact on design and amenity for example, and other material planning considerations. This approach would reduce pressure on land elsewhere to deliver new homes, and would likely require an amendment to our current policy on density (*Development Management Plan* policy DM2), which sets a minimum of 30 homes per hectare, but does not set out criteria for increasing density in town centres and around sustainable transport hubs for example. *Development Management Plan* policy DM3 also supports appropriate infilling and residential intensification.
B. Increase density on allocated residential sites	Similarly allocated sites that have not yet been delivered could accommodate more new homes, provided this would not have a detrimental impact on design and amenity for example, and other material planning considerations. Ensuring that identified sites are utilised efficiently is advocated in the *Housing White Paper* which seeks to discourage building at lower densities (however this is defined). This approach would reduce pressure on land elsewhere to deliver new homes.
C. Several small extensions to the existing residential area	Small extensions that relate well to the existing residential area tend to be serviced by infrastructure and services such as schools and shops. The *Housing White Paper* expresses clear support for small and medium-sized house builders, and the delivery of small and medium-sized sites to deliver new homes more quickly than larger house builders. Although this is a reasonable approach, cumulatively with the current structure of S106 agreements and CIL, this could impact on the level of funding secured to deliver meaningful mitigation to offset new homes delivered. However, the impact may not be so severe if considered in conjunction with other options.
D. A number of fewer larger	Larger extensions that relate well to the existing residential

Option	Justification
extensions to the existing residential area	area are serviced by infrastructure and services such as schools and shops. These sites can contribute more to improving existing infrastructure and deliver new infrastructure through S106 agreements and CIL to mitigate the impact of any scheme.
E. A new settlement	The Government has already expressed support for ten new garden towns and cities and 14 new garden villages. We are required to consider all reasonable options to deliver new homes within in our area. There is an opportunity to consider, and potentially deliver, a new, sustainable settlement in the district, supported by necessary infrastructure, although this would depend on developing a range of evidence.

Good Mix of Homes

Tell Us More SP1.4: How do we plan for and deliver a good mix of homes in the future? What types, sizes and tenures are needed?

Where are we now?

6.486.49   A good mix of homes on schemes to meet the needs of a range of people is supported by national policy, through identifying the type, size, tenure and range of homes needed in the area. Our housing need for market and affordable homes, and homes for older people and adults with disabilities have been identified in the *South Essex SHMA Addendum 2017* within the OAN. We must also consider the type and size of homes that are provided so that they meet the requirements of those looking to move into them. The *South Essex SHMA Addendum 2017* identifies the existing housing stock – by number of bedrooms – from the 2011 Census, and suggests the likely size of properties required in the district between 2014 and 2037; this is set out in Table 5 6 below. In relation to the type of homes that should be provided – flats, detached, semi-detached etc. – the *South Essex SHMA Addendum 2017* recognises that this is likely to be driven by the market, which will determine the type of housing that is most appropriate to meet demand at any point in time.

Table 56: Implied Size of Housing Required 2014 – 2037 (Source: *South Essex SHMA Addendum 2017*)

1 bed	2 beds	3 beds	4+ beds
7%	24%	42%	27%

6.496.50   A need for smaller properties, in particular bungalows, was raised through the early community engagement programme in 2016. Bungalows are typically one or

'one and a half' storey homes, generally containing no more than two bedrooms. The district is home to a modest number of bungalows. The *PPG* states that we should ensure that our policies recognise the diverse types of housing needed in our area, including, where appropriate, the provision of bungalows[26].

~~6.50~~6.51   Our current policy on housing mix in the *Core Strategy* (policy H5) requires developers to consult the Council's Housing Strategy team on the mix of house types to be delivered on a site; this is broadly based on the needs of those on our Housing Waiting List. Specific reference is made to three or more bedroom homes for those requiring affordable homes, whether social or intermediate (shared-ownership). However there is a continued need to ensure that there is an appropriate mix of properties within schemes that cater for all housing needs. With the population of over-65s in the district projected to rise over the next 20 years, it remains of significance to consider how best to cater for the housing needs of this portion of our population. As of October 2017, however we have a significant amount of sheltered accommodation compared to our current demand. At present our biggest demand is for 1 and 2 bed properties, which makes up over 75% of our Housing Waiting List.

~~6.51~~6.52   Density also needs to be considered to ensure that any schemes make efficient and effective use of available land – without undermining other factors such as design or amenity. Our current policy in the *Development Management Plan* (policy DM2) establishes a minimum of 30 homes per hectare, unless there are exceptional circumstances that suggest that this should be lower. It takes a flexible approach to density, indicating that schemes should take cues from the site's immediate context, on-site constraints, type of development proposed and the need to provide a good mix of homes. There is reference to 75+ homes per hectare potentially being appropriate within town centres in the *Development Management Plan*, but this is not currently reflected in policy.

~~6.52~~6.53   We also require new homes to meet the *National Technical Housing Standards – nationally described space standards*[27] which were introduced in March 2015, replacing our own policy on floorspace standards in the *Development Management Plan*. Elements of our policy do, however, remain important such as ensuring a good internal layout, well-designed, planned and useable spaces.

What are the identified issues?

~~6.53~~6.54   There are a number of uncertainties at the national level, in relation to density and floorspace, due to the publication of the *Housing White Paper.* The paper supports the efficient use of land and recommends avoiding building homes at low densities where there is a shortage of land for meeting identified housing requirements (that are set out in the *SHMA*). It also supports potential for higher-density development in urban locations, although the paper acknowledges that developments should reflect the character of each locality. This is key to utilising land effectively, particularly where brownfield (previously developed) land is scarcer.

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[26] Paragraph: 006 Reference ID: 12-006-20150320

[27] www.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard____Final_Web_version.pdf

6.546.55   Minimum space standards are recognised at the national level as being an important tool in delivering high quality family homes. The delivery of, and access to, high quality homes can also have a positive impact on health and well-being of communities. The *Housing White Paper* suggests that these standards will be reviewed to ensure greater local housing choice, as there is concern that a one size fits all approach may not reflect the needs and aspirations of a wider range of households. Any changes to national policy and guidance will need to be taken into consideration.

6.556.56   Specifically in relation to bungalows, nationally prescribed permitted development rights have meant that many bungalows have been able to be converted into 'chalets' or houses without the need to apply for planning permission, such as through the construction of dormer windows or hip-to-gable alterations. Also the conversion of loft-space into habitable rooms, such as additional bedrooms, has typically not required planning permission. Even when planning permission has been sought, our policies have not specifically resisted the conversion of bungalows, unless doing so would cause unjustifiable harm to local amenity for example. Many bungalows in our district have been subject to large increases in built-form and floor space, which has reduced both their affordability and suitability for certain members of our communities.

6.566.57   The majority of new bungalows built in the district have been as a result of 'infill' or backland development, typically within the existing residential area, where the size and characteristics of the site mean a bungalow is the most appropriate, or only realistic, form of development. They are also typically delivered by small to medium sized house builders on smaller sites. Whilst our current policies do require a mix of housing types, and the provision of specialist accommodation which may provide an alternative to bungalows, the number of new bungalows being built within the district remains relatively low. In addition, the *South Essex SHMA Addendum 2017* recognises that between 2001 and 2011, 72% of the housing stock delivered in South Essex was flats. An appropriate mix of homes is therefore required to ensure that housing stock meets the needs of all residents.

What are the realistic options?

6.576.58   Four options have been identified in relation to the broad approach for considering the type and size of new homes.

Option	Justification
A. Retain the current policy on types of homes, which takes a flexible, market-driven approach to types	*Core Strategy* policy H5 is responsive to market conditions. However, it lacks guidance of the types of homes that are likely to be needed in the district, taking into consideration the existing housing stock. There is uncertainty for local communities on the type of homes that would be delivered as part of a particular scheme.
B. Include specific reference to the size and types of homes referred to the	This slightly more prescriptive approach would ensure that there is an appropriate mix of homes on a particular scheme, as suggested in the *South Essex SHMA.* However, there could be an element of flexibility to ensure

Option	Justification
South Essex SHMA	that the policy would not undermine the viability and deliverability of a scheme. A county or region-wide approach could be considered.
C. Continue to require new homes to meet the *National Technical Housing Standards – nationally described space standards*	Ensuring that schemes meet the national space standards would ensure that all homes are of a suitable standard. It is important however that the right balance is struck between the density of a scheme and the internal floorspace of homes. It is likely that these national standards will be reviewed in due course to be more responsive to different circumstances. This would require an update to *Development Management Plan* policy DM4 on expected standards – reference to good internal layout and being suitable for modern living is considered to still be appropriate.
D. Do not adopt specific policy on the mix of homes	National policy requires that a good mix of homes is delivered on schemes to meet the needs of a range of people. Failing to have a policy on the mix of homes is not considered to be an appropriate approach to this issue.

6.586.59   There are two potential options that have been identified specifically in relation to bungalows, if local evidence can demonstrate that there is a real need for this type of intervention.

Option	Justification
E. Consider a proportion of new homes delivered as part of larger schemes, above a certain threshold, to be bungalows	Requiring a proportion of new homes to be bungalows may help to ensure a diverse mix of housing which greater reflects and serves the needs of the wider community, in line with national policy requirements. However, care would have to be given to ensuring such a policy did not impose such an obligation onto developers so as to make any development unviable. It is likely that such an obligation would therefore have to be subject to viability considerations. Such an approach would need to be clearly evidenced.
F. Consider removing permitted development rights for new bungalows, or introduce a policy to limiting the conversion or enlargement of existing bungalows	The removal of permitted development rights would help to ensure that new bungalows are retained as such unless, through a full planning application, we considered the enlargement or conversion of the bungalow to otherwise be acceptable. Similarly limiting the development of existing bungalows may help to ensure that existing bungalows are retained as such. However, the majority of bungalows would still have permitted development rights and as a

Option	Justification
	result, may be able to undergo enlargement or conversion without requiring planning permission. Attention would have to be given to whether such an approach was reasonable and/or proportionate, and would need to be clearly evidenced.

6.596.60   Three options in relation to the density of schemes have been identified.

Option	Justification
G. Retain the current policy on density of schemes	Our current *Development Management Plan* policy DM2 establishes a minimum of 30 homes per hectare in an attempt to ensure that efficient use is made of available land in the district. The policy seeks to be responsive to the local area, constraints etc.
H. Include specific criteria on circumstances when density should be greater than the minimum	This approach would specify when it may be appropriate to increase the density of a scheme in the most sustainable locations – for example within or near to town centres or transport hubs. Flexibility could be integrated to enable lower densities in appropriate circumstances.
I. Do not have a specific policy on density	Paragraph 47 of the *NPPF* seeks to set national policy to deliver a wide choice of high quality homes; this includes enabling Local Planning Authorities to set our own approach to housing density to reflect local circumstances. This approach would therefore not be appropriate.

Gypsy, Travellers and Travelling Showpeople

Tell Us More SP1.5: How do we sustainably meet our need for Gypsy and Traveller pitches over the next 20 years?

Where are we now?

6.606.61   A need for 15 Gypsy and Traveller pitches up to 2018 was identified in the *Core Strategy* as a result of the policies in a former regional plan called the *East of England Plan,* which was published in 2008 (*Core Strategy* policy H7). This policy sets out a criteria-based approach to the provision of sites. Our *Allocations Plan* (Policy GT1) identifies a specific site for the delivery of these 15 Gypsy and Traveller pitches to the south west of the district (at Michelins Farm in Rayleigh) to be delivered by 2018. An *Essex Gypsy and Traveller Accommodation Assessment (GTAA)* was undertaken in 2014[28] to provide updated information on need across the county. A need for Gypsy

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[28] www.rochford.gov.uk/sites/default/files/2014%2007%2016%20Essex%20GTAA%20Final%20Report.pdf

and Traveller pitches was identified, but there was no need for Travelling Showpeople plots.

6.616.62   The Housing and Planning Act 2016 requires us to consider the needs of people living in or coming into the district in relation to the provision of sites on which caravans can be stationed. National policy on such provision is contained in the *Planning Policy for Travellers Sites (PPTS)*. There is a requirement for Local Planning Authorities in national policy to identify and provide for a five year supply of such accommodation alongside traditional market and affordable homes. The *PPTS* was updated in 2015, which changed the definition of how a 'traveller' is defined for planning purposes – this means that the definition now excludes those who no longer travel permanently.

6.626.63   Within the *2015 PPTS* Gypsy and Travellers are defined as:

"Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such."

6.636.64   Travelling Showpeople are defined separately as:

"Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above."

6.646.65   Following this change in definition of Gypsies and Travellers, a further Essex-wide *GTAA* was commissioned to understand the implications for plan-making. This revised assessment included a desk based survey using the Government's annual Gypsy and Traveller data, supplemented by a number of site visits (including re-visits) to each identified site and interviews. A total of 18 pitches were identified in the district; the findings of the interviews (where possible) is set out in table 6 7 below. One pitch was found to be vacant, the total number of pitches identified is reduced to 17.

Table 67: Findings of the interviews undertaken on identified Gypsy and Traveller sites in Rochford District

Site Status	Meet Planning Definition	Unknown	Do Not meet Planning Definition	Total
Private sites	2	0	3	**5**
Temporary sites	0	1	0	**1**
Unauthorised sites	3	1	7	**11**
Total	**5**	**2**	**10**	**17**

6.656.66   Our Gypsy and Traveller site at Michelins Farm in Rayleigh was allocated to meet the need for 15 pitches identified in the *Core Strategy* policy H7, which was a

requirement of regional policy at the time. This requirement was calculated based on a 3% compound increase in the Gypsy and Traveller population. However, the emerging *GTAA 2017* has recognised that this broad national application of household formation is not always appropriate at the local level. For all 'known' sites that formed part of our assessment (i.e. those that were interviewed), a 1% increase is considered appropriate for our district.

6.666.67   Taking into account household formation rates for the district's Gypsy and Traveller population, the emerging GTAA evidence for Rochford District identifies a need for an additional six pitches to be delivered between 2016 and 2033 for those that do meet the planning definition. This is based on the three unauthorised pitches (Table 6) that meeting the definition plus allowances for concealed households/doubling-up/over crowding, a need within five years from older teenage children and new household formation (based on a rate of 1%). This is in addition to the two private pitches already with planning permission.

6.676.68   Two households were unable to be interviewed. In this instance, it has been calculated that there may be a requirement for up to three additional pitches for the two unknown Gypsy and Traveller households that may fall into the new planning definition. Nationwide research has shown that approximately 10% of households that have been interviewed fall within the planning definition; if this is applied to the two unknown households, there could be no additional pitches required.

6.686.69   The interviews found that 10 pitches are required for Gypsies and Travellers that do not fall within the new planning definition, arising from the 7 unauthorised pitches, concealed households/doubling-up/overcrowding and new household formation (based on a rate of 1.1%). This is in addition to the three pitches which do not meet the definition but already have planning permission (Table 76). If the potential need from 90% of unknown households is added to this total of 10 additional pitches, then the need for non-travelling households could rise to 12 additional pitches.

6.696.70   There is no need has been identified for Travelling Showpeople plots in our district.

6.706.71   These finding of the emerging *GTAA 2017* for Rochford District are summarised in Table 7 8 and 89.

Table 78: Need for Gypsy and Traveller pitches in Rochford District 2016 to 2033 (source: Rochford District element of the *GTAA 2017*)

Status	GTAA	SHMA	Total
Meet planning definition (incl. 10% of unknowns)	6 (6+0)	0	**6**
Not meeting planning definition (incl. 90% of unknowns)	0	13 (10+3)	**13**
Total	**6**	**13**	**19**

Table **89**: Breakdown of five year need for Gypsy and Traveller pitches (source: Rochford District element of the *GTAA 2017*)

Years	0-5	6-10	11-15	16-17	
Planning definition status	2016-21	2021-26	2026-31	2031-33	Total
Meet planning definition	5	0	1	0	**6**
Unknown	2	0	1	0	**3**
Do not meet planning definition	8	0	1	1	**10**
Total	**15**	**0**	**3**	**1**	**19**

6.71**6.72**   The change in the *2015 PPTS* definition means that whilst there is no longer a need to provide Gypsy and Traveller pitches for those that do not meet the planning definition, there is still a need to provide accommodation for them in addition to the need for market, affordable and other types of homes assessed within the *Strategic Housing Market Assessment* (SHMA).

6.72**6.73**   The *Strategic Housing and Employment Land Availability Assessment* (SHELAA) *2017* has considered the suitability and availability of sites for the delivery of Gypsy and Traveller pitches over the next plan period, including an assessment of the 15 pitch site, at Michelins Farm in Rayleigh, allocated under policy GT1 of our *Allocations Plan*. A total of 11 sites in the Green Belt have been considered in the assessment.

6.73**6.74**   Our assessed need up to 2033 identified in Table **98** could be met through our 15 pitch site allocated in our current *Allocations Plan* policy GT1, at Michelins Farm in Rayleigh, including a five year supply. This means that we can demonstrate a five year supply (up to 2021) for all households within the district, regardless of whether they meet the *2015 PPTS* definition or not. The allocated site is in the early stages of delivery but it is envisaged the site will be delivered in the short term. Despite this position, unauthorised sites in the Green Belt do still occur, and are pursued through our planning enforcement powers.

What are the identified issues?

6.74**6.75**   Similar to the delivery of market and affordable homes there is a requirement for Local Planning Authorities to demonstrate a five year supply of land to meet the needs of Gypsies and Travellers. If we are unable to demonstrate a five year supply of deliverable sites, the Government has made it clear that this in turn may make it more difficult for us to justify reasons for refusing planning applications for temporary pitches at appeal.

6.75**6.76**   Although we can meet the majority of our needs for Gypsies and Travellers pitches through our current allocated site; we are no longer required to deliver pitches for those that do not meet the planning definition in the *2015 PPTS*. How these needs are met in the future must be carefully considered.

6.76**6.77**   There is also likely to be a need for transit provision or temporary stopping places for Gypsies and Travellers in Essex. As noted in the Rochford District element of the emerging *GTAA 2017*, however, the situation with unauthorised encampments

across Essex should be monitored and we will need to work with other authorities (as part of the Duty to Co-operate) to develop an appropriate policy response.

What are the realistic options?

6.776.78   There are five options that have been identified to meet the needs of Gypsies and Travellers.

Option	Justification
A. Retain the current criteria-based policy (*Core Strategy* policy H7)	The criteria within this policy are considered to be appropriate when considering applications for Gypsy and Traveller pitches, although reference to guidance and evidence will need to be updated.
B. Retain the current allocated site (*Allocations Plan* policy GT1)	This site could meet the needs of the majority of households that were identified in the Rochford District element of the *GTAA 2017* that are on unauthorised sites or have temporary planning permission in the district i.e. those that do and do not meet the definition in the *PPTS*.
C. Allocate a number of smaller Gypsy and Traveller pitches / sites to meet needs	Another approach is to allocate a smaller number of sites throughout the district – however it is likely that these sites would have an impact on the purposes of the Green Belt, in particular openness. A site has already been allocated to meet the majority of needs, and is in the early stages of delivery.
D. Consider a mobile home policy for those no longer falling within the Gypsy and Traveller definition	An alternative to providing for all households on the allocated sites is to develop a specific criteria-based policy and allocation for those which do not meet the definition of a Gypsy and Traveller in the *PPTS.*
E. Prepare a more detailed criteria-based policy	A criteria-based policy would enable – in addition to the need that has been identified in the *GTAA 2017* – to be appropriately addressed through the planning system. This would need to highlight that allocated sites meet the needs of our current (i.e. assessed in the *GTAA*) population first.
F. Do not have a policy on Gypsy and Traveller provision	This is not considered to be an appropriate option as there is a requirement, as there is for market, affordable and other types of homes, to ensure that adequate provision is made for Gypsies and Travellers through the plan-making process. If provision is not made for these groups over the plan period, this would be contrary to the Equalities Act 2010, for example, other legislation, and national policy. The plan would likely fail the legal and soundness tests at the examination stage.

Houseboats and Liveaboards

> **Tell Us More SP1.6: How do we sustainably provide for houseboats and liveaboards over the next 20 years?**

Where are we now?

6.78~~6.79~~   Houseboats are defined in our *Development Management Plan* as a boat which is not primarily used for navigation, and is kept on a river or its estuaries, creeks and tributaries, or other natural or man-made waterways such as lakes, long term for residential use. Consultation took place in 2016 on draft national guidance for reviewing housing needs for caravans and houseboats. However, to date national policy does not give any guidance on how houseboats should be treated.

6.79~~6.80~~   Whilst the definition in our *Development Management Plan* broadly aligns with that in the Crouch Harbour Act 1974; in practice the navigation clause could be used to sidestep compliance with our current policy which seeks to regulate and ensure impacts on the natural environment are effectively considered and mitigated against. The definition in the Housing and Planning Act 2016 provides broader guidance on what could constitute a 'houseboat', and is inserted into section 8 of the Housing Act 1985. Within the Act, a houseboat is considered to mean "a boat or similar structure designed or adapted for use as a place to live." For planning purposes, a houseboat therefore includes those that are permanently or temporarily moored for any period of time, and would require planning permission.

6.80~~6.81~~   This is a departure from our current policy. The houseboat policy in the *Development Management Plan* (policy DM24) is clear that proposals for permanent moorings should not have a negative impact on sites of ecological importance, the Green Belt, the historic environment, water and air quality, or other users of the waterways for example, but does not include those which may be temporarily moored (however this is defined). There are a number of houseboats in the district – some of these may be lawful for planning purposes through the passage of time and some do have planning consent through enforcement appeals. There are also enforcement cases open on the majority of the boatyards in the district.

6.81~~6.82~~   Although we do not have any "inland waterways" which are specifically referred to in the Housing and Planning Act 2016 in relation to houseboats; as the rivers Crouch and Roach are tidal waters, there is a need for us to establish our current position with houseboats on our waters. This would assist us in monitoring the situation through planning but would also assist the Crouch Harbour Authority in regulating this type of use. As part of the Duty to Co-operate we will work with other neighbouring authorities and relevant bodies such as the Marine Management Organisation, Natural England and the Environment Agency to clarify our position.

What are the identified issues?

6.82~~6.83~~   The rivers Crouch and Roach and their estuaries, creeks and tributaries are ecologically significant habitats important for wildlife which encompass some of the most sensitive environments within the district. These habitats are protected by national and international nature conservation designations, and we will continue to protect them from any unnecessary disturbance or pollution. The presence of

houseboats has the potential to have a negative impact on these sensitive environments, through disturbance such as noise, light pollution and movement. Land-use planning control however only extends as far as the mean high water spring tide[29].

6.83 6.84 Houseboats with permanent moorings in particular are considered by us to be residential development as their occupation would require the development of infrastructure needed for their continued occupation. This can have an impact on visual amenity. Such paraphernalia includes not only the infrastructure which is associated with traditional permanent homes, such as pedestrian and vehicle access roads, car parks and toilets, but also fuel stores, boardwalks, railings, jetties and sheds. The definition in the Housing and Planning Act 2016 extends this definition to include any vessels which could or are being lived in – whether temporarily or permanently moored. The design and size of houseboats can make some vessels have a more intrusive impact on the landscape than an ordinary vessel. The impact of houseboats on the landscape and character of the Green Belt is an important factor. Design and siting of such vessels are therefore key considerations.

6.84 6.85 This type of development would not only impact on the wildlife and the nature conservation importance of the rivers, but also our current policies on the delivery of homes and protecting the Green Belt in our *Core Strategy* and *Development Management Plan*. It is also important that the safe and efficient navigation of the rivers is not adversely affected by any development along them.

What are the realistic options?

6.85 6.86 There are four options that have been identified to address the mooring of houseboats in our district.

Option	Justification
A. Retain the existing policy	The existing policy in the *Development Management Plan* (policy DM24) sets out a criteria based approach to houseboats to ensure that any moorings are appropriately controlled and would not have a negative impact on the environment or other users of the waterways.
B. Amend the existing policy to strengthen criteria	Houseboats have the potential to be located in the most sensitive environments; so it is important that the policies will minimise or, where possible, prevent any negative impact, and to strengthen any necessary enforcement action. This could include the design and size of such vessels, domestic paraphernalia and associated operational development.
C. Allocate specific areas of coastline where such uses may be acceptable	Designating an area – the 'planning unit' – would provide greater clarify for local communities and occupiers of such vessels. It would also help with planning enforcement. This

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[29] Below this point, the Marine Management Organisation is responsible
mis.marinemanagement.org.uk/planning-on-land-and-at-sea

Option	Justification
	approach would require input from Natural England and other bodies.
D. Amend the definition in the *Development Management Plan*	The definition of what constitutes a houseboat could be considered and agreed at the Essex level to assist relevant bodies with the management of such vessel on the county's waterways.
E. Do not have a policy on houseboats	Although houseboats are not specifically referred to in the *NPPF*, we need to be mindful that any moorings and associated occupation on our rivers could have an impact on the local environment. This is not considered to be an appropriate approach.

Meeting Business Needs

> **Tell Us More SP1.7: How do we sustainably meet businesses needs over the next 20 years?**

Where are we now?

6.866.87 The district is home to over 3,200 businesses and has a low rate of unemployment. Of these businesses over 87% employ between 1 and 9 employees, just under 11% employ between 10 and 49 employees, over 1% employ between 50 and 249 employees and only 0.1% employ over 250 employees. Compared to the rest of the county, however, we have the most positive survival rates of start-up businesses – with over half of all businesses recorded as surviving between 2009 and 2013. We also consistently have a low rate of working age residents who claim out-of-work benefits (previously job seekers allowance). Compared to the rest of Essex, we also have the highest proportion of 'managers, directors and senior officials' and the second highest in 'professional occupations'.

6.876.88 The security of a rewarding and enjoyable job can have a positive impact on health and well-being. Our current policies in the *Core Strategy* support the development of economic growth in the district with an ambition to deliver 3,000 new jobs over the plan period (as required by the former *East of England Plan 2008*). To deliver these new jobs, our current economic growth strategy broadly focusses on developing existing spatial patterns of employment through; providing higher level employment, realising the economic potential of London Southend Airport, and enhancing the skills of the district's population. Skills, education and childcare are essential to the ability of our residents to access local employment opportunities; these are considered in more detail in the 'Supporting Health, Community and Culture' chapter.

6.886.89 There is also a recognised entrepreneurial culture in the area. It was envisaged that the majority of these new jobs would be delivered on new employment land to the north west of London Southend Airport, adjacent to the existing Aviation Way Industrial Estate. To support the delivery of this new employment land – and new local job opportunities – we worked closely with Southend Borough Council to prepare the

London Southend Airport and Environs Joint Area Action Plan (JAAP), which sets out appropriate controls for the operations of London Southend Airport in the future, and the requirements for a new Business Park in our district.

6.896.90   The *Core Strategy* seeks to encourage development that enables the economy to diversify and modernise through the growth of existing businesses and the creation of new enterprises providing high value employment, having regard to environmental issues and residential amenity (policy ED1). This includes supporting the enhancement of town centres and London Southend Airport, the development and growth of home businesses and the voluntary sector, and the protection and enhancement of small and medium sized businesses. It also seeks to support the development of a skills training academy, Cherry Orchard Country Park and the Wallasea Island Wild Coast Project. It is however also recognised that there are a number of physical constraints within our district that restrict opportunities for employment growth. The two primary constraints are the rural nature of the district together with the limited transport links – both issues are more prevalent in the east of the district. We therefore seek to support and encourage rural diversification in the district and improved transport connections.

6.906.91   The *Economic Development Needs Topic Paper 2017* has been prepared to provide a broad overview of the projected need for new employment land and the likely change in demand for different types of accommodation arising from the emerging South Essex EDNA. This assessment sets the context for our *Employment Land Study Update 2014* which looks in detail at the appropriateness of land that is currently allocated for employment use in the *Allocations Plan*. The emerging evidence from the *EDNA 2017* suggests that there is a need for up to 16 hectares of 'new' employment land between 2016 and 2036, which is considered further below*.*

What are the identified issues?

6.916.92   The *Grow-On Space Feasibility Study 2016* prepared on behalf of Essex County Council recognises that there is an imbalance between the potential demand and supply for grow-on space across most of Essex (excluding Southend and Thurrock Borough Councils) – but this is most pronounced in Rochford District. We are the second highest in the area and above the county, eastern region and national for Micro Businesses (0 to 9 employees) at 87.6%, just below Castle Point Borough, so there is a good supply of local businesses that would either require start-up space or eventually grow-on space. This means that there is a lack of available grow-on space for our businesses. The Feasibility Study identifies that there are a number of possible reasons why there is a shortage of this type of space; including its delivery not being an attractive proposition for the private sector, a shortage of available land (the pressure to deliver new homes impacts on land values, which then impacts viability), poor quality of units on existing employment land (building fabric, as well as broadband and parking), and affordability.

6.926.93   There have been some issues with matching business needs – particularly for those outside the area looking to locate to the district – with available employment land opportunities. In practice this appears to stem from the range of available unit sizes (particularly larger units), the quality of available units, negotiations with landowners on new employment land that has been allocated, and the potential cost

of units on new employment land. This also links to how we make the best use of available employment land, which is considered further below.

6.936.94   The availability of broadband in more rural areas is a constraint to the development of rural diversification, specifically tourism, and the growth of home businesses. Although the Superfast Essex project is working to improve coverage in the district, there is a need to continually support the provision of broadband particularly in rural areas to support the local economy. The links between broadband and tourism were raised through the early community engagement programme in 2016. Whilst broadband is important in rural areas, it is still necessary to support its continued development in more urban areas of the district to continue to support local businesses and local employment opportunities. Broadband and other telecommunications infrastructure are considered in more detail in the 'Delivering Infrastructure' chapter.

6.946.95   We have a high level of car ownership in the district and there are high levels of out-commuting to employment locations outside the district, which can impact on our road network at peak times. There is a need to support local businesses to deliver local employment opportunities and the up-skilling of our workforce to fill local jobs. We need to support improvements to the strategic road network across South Essex to help unlock local employment growth potential and increase the attractiveness of the area to businesses – particularly given the location of London Southend Airport within the district. The local road network also needs investment to improve accessibility across the district. The availability of realistic and affordable sustainable ways to travel in the district would also be of benefit to those looking to access local employment opportunities particularly those without access to a private vehicle; this can include safe and attractive walking and cycling routes.

What are the realistic options?

6.956.96   There are five options that have been identified to support employment and economic growth in the district.

Option	Justification
A. Continue to support employment growth within the current employment growth policy	*Core Strategy* policy ED1 supports a number of key initiatives to deliver new local job opportunities, and business start ups and business growth in the district. These initiatives are still considered to be of importance over the next 20 years to ensure economic growth. However this could benefit from minor updates to reflect new evidence.
B. Update the current employment growth policy to include reference to broadband	Despite the roll out of the Superfast Essex broadband programme, there is a need to support continued broadband improvements in the district, as broadband is particularly poor in the rural eastern extent of the district which can impact on rural diversification opportunities, as well as the growth of home businesses. Broadband is considered in more detail in the 'Supporting Health,

Option	Justification
	Community and Cultural Facilities' chapter. *Core Strategy* policy ED1 could benefit from updating to reflect this need.
C. Update the current employment growth policy to further support new businesses at each stage of their lifecycle – in particular to reflect the need for grow-on space	*Core Strategy* policy ED1 makes reference to an Eco-Enterprise Centre in the district, which would offer invaluable support and advice for early stage businesses at the most vulnerable point in their lifecycle. However the *Grow-On Space Feasibility Study 2016* recommends that there is a requirement for grow-on space for local businesses in the district to support and nurture them. *Core Strategy* policy ED1 could benefit from updating to reflect this need to ensure that we can support our high level of start-up businesses and enable them to grown within our district.
D. Include specific reference in the current employment growth policy to tourism and rural diversification	There is a need to support tourism and appropriate forms of rural diversification in the district to deliver local, rural job opportunities and promote rural economic growth. This is considered in more detail in the 'Supporting Health, Community and Cultural Facilities' chapter.
E. Include specific reference to supporting sustainable travel options and promoting highways improvements	The highway network, and a lack of appropriate and realistic sustainable transport options, can impact on the prosperity of local businesses. It is important that highway improvements and sustainable transport options are supported and promoted to improve accessibility to local jobs for all our working age population, particularly those without access to private transport. This is considered further in the 'Delivering Infrastructure' chapter.

Need for Jobs

Tell Us More SP1.8: How do we plan for and facilitate the delivery of our need for new jobs over the next 20 years?

Where are we now?

6.96~~6.97~~ There are 10 sites allocated for employment use in the *Allocations Plan* spread across the district. These sites total 112 hectares, which represents 8% of South Essex's total employment land stock. They are predominantly located in the district's three urban centres of Rayleigh, Hockley and Rochford, as well as a key employment site on Wallasea Island which provides local port-related employment. There are a number of smaller, more informal sites located in the Green Belt which also perform an important function in providing local employment opportunities. Allocated employment land was reviewed a number of years ago when the current policies were being prepared, which means that four sites that were previously allocated for

employment land were reallocated for other uses. Three new sites were also allocated to compensate for this and to deliver additional high, quality employment land.

6.976.98   Our approach to reallocating existing employment land for residential use and the allocation of new employment land formed part of our wider strategy for delivering new homes through encouraging the relocation of existing 'bad neighbour' industrial estates, as set out in the *Core Strategy* and *Allocations Plan*. In short, the new employment land at Michelins Farm in Rayleigh and land to the south of Great Wakering were allocated to compensate for the de-allocation of existing employment land at Rawreth and Star Lane industrial estates, respectively. Significant new employment land was also allocated to the north west of London Southend Airport, to partly compensate for the aspiration of a mixed-use development on Eldon Way industrial estate in Hockley and Stambridge Mills in Rochford, in addition to delivering thousands of new local job opportunities for our residents primarily in high-tech business sectors across 99,000sq.m of floorspace.

6.986.99   The *NPPF* (paragraph 22) requires us to identify a portfolio of sites within the district that have a reasonable prospect of being delivered, and that allocations should not simply be 'rolled over' from one plan period to the next. The *PPG* is also clear that in identifying land for economic development it should be demonstrated that it is "suitable, available and achievable…over the plan period".

6.996.100   An Economic Development Needs Assessment (EDNA) has been commissioned for South Essex to assess the cross-boundary economic development needs in the sub-region. This emerging high-level, strategic assessment seeks to bring together growth opportunities across South Essex, and ensure that the area acts like one functional economic hub, rather than developing competing or conflicting schemes. The emerging EDNA is supplemented by our *Employment Land Study Update 2014* which provides an up-to-date position on employment land supply and quality within the district. The *Economic Development Needs Topic Paper 2017* summarises the emerging findings from the EDNA.

6.1006.101   The Topic Paper provides an overview of the analysis in the emerging EDNA of commercial property market trends review, a baseline SWOT analysis of South Essex, the socio-economic characteristics of the district, and an assessment of current and potential employment land supply portfolios. The Topic Paper notes that the 10 allocated employment sites in Rochford District can be split into six sub-market areas – London Southend Airport, Purdeys, Great Wakering, Wallasea Island, Southend Arterial Road and the rural cluster of Rayleigh, Hockley and Ashingdon. Each cluster has different characteristics, making them more suitable for certain types of employment over others.

6.1016.102   Potential future employment land supply has also been identified; these are sites which have been promoted through the 'Call for Sites' process to inform the *SHELAA 2017,* and allocated land identified in the *Allocations Plan* which has yet to be delivered. The site assessments are detailed in the Topic Paper at Appendix B. This equates to 175.4 hectares of potential future employment land supply. Each potential site has been assessed to understand its potential contribution as future employment land, the type of employment use it is most suitable to accommodate, and the likelihood of this coming forward in the short, medium and long term.

3.79

6.102<u>6.103</u>   Two potential employment growth scenarios have been applied to a baseline position as detailed in the *Economic Development Needs Topic Paper 2017.* This takes account of the impact of London Southend Airport, and the potential relocation of businesses from London into South Essex. A 'combined scenario' suggests that there is a need for a minimum of 7 hectares of 'new' employment land between 2016 and 2036. It is anticipated that over this period, within the Topic Paper, that there will be a reduced demand for warehousing in the district, and a greater demand for manufacturing / industrial (B1c / B2) uses on 6 hectares and higher density office (B1) developments on a further 1 hectare of land. This requirement equates to total employment creation of 1,242 jobs over the projection period (2016-2036), which equates to job creation of approximately 62 jobs per year.

6.103<u>6.104</u>   Supply-side adjustments are then made, as set out in the *Economic Development Needs Topic Paper 2017*, to consider unexpected (windfall) losses of employment land and 'churn' in the market. The emerging EDNA suggests that this could generate a need for a further 9 hectares, the majority of which could be needed for manufacturing and industrial business uses. However, caution is advised as some of the stock lost to other (non-B class) uses when units became vacant may have become redundant naturally, and so planning for a total of 16 hectares could therefore be over-inflating the actual need. The potential requirement for new employment land in the district over the next plan period is summarised in table <u>10</u>9 below.

Table 9<u>10</u>: Requirement for economic land in Rochford District

Total Employment Land Supply (Allocations and Call for Sites) (ha)	Total Employment Land Demand (ha) : Combined Scenario	Total Employment Land Demand (ha) : Combined Scenario with supply side adjustment	Employment Land Demand as % of Supply
175.4	7	16	1% or 2%

6.104<u>6.105</u>   *Development Management Plan* policy DM32 provides more detail on how planning applications on employment land would be treated. Its seeks to deliver a predominance of business (B1) and light industrial (B2) uses on sites, which broadly aligns with the projected demand for building stock over the next 20 years in the emerging EDNA as detailed within the identified in the *Economic Development Needs Topic Paper 2017.*

What are the identified issues?

6.105<u>6.106</u>   Each area across South Essex (Basildon, Castle Point, Rochford, Southend and Thurrock) has different strengths in terms of attractiveness and clustering of business sectors. Basildon and Thurrock in particular, given their location near to the strategic road network and the development of their enterprise corridor and ports respectively, have strong local economies and can act as a draw for businesses.

Combined with the ease of access into London, the district experiences high levels of out-commuting.

6.1066.107   The *Economic Development Needs Topic Paper 2017* recognises that Rochford District has the second lowest job density in South Essex, which is determined by the number of jobs divided by the number of working age people resident in the area. Low job density, if left unchecked, has the potential to form a feedback loop with out-commuting, as one re-enforces the other. Providing adequate local jobs is therefore important for the sustainability of an area through a potential reduction in out commuting.

6.1076.108   Both Rochford District and Southend have supported the growth of London Southend Airport as an important, thriving regional facility, however, in order to generate high-value local employment opportunities. Nevertheless there is a need to invest in infrastructure and education to continue to improve the attractiveness of South Essex and to enable the sub-regional economy to continue to grow. Issues raised during the early community engagement undertaken in 2016, also included ensuring sites are accessible by different transport modes (such as walking and cycling), broadband connectivity, refurbishment of existing stock, impact on roads and more diverse businesses and local employment opportunities are needed in some areas.

6.1086.109   The *Economic Development Needs Topic Paper 2017* identifies six clusters of employment land that have emerged through the EDNA; Purdeys; Great Wakering; Wallasea Island; Southend Arterial Road; Rayleigh, Hockley and Ashingdon; and London Southend Airport. The assessment has considered the predominant stock quality and overall site quality, and makes some high-level recommendations for the future of these sites. There has been a notable increase of leisure uses looking to allocate on some of our industrial estates, which whilst providing a mix of uses undermines the predominant business uses on these sites. This can been taken into consideration in the allowances for windfall losses within the Topic Paper however. The emerging EDNA concludes that the majority of sites should be 'protected and maintained' or 'protected and enhanced' with the exception of two sites (Rochford Business Park and Purdeys industrial estate) which should be 'monitored and managed'. This stems from an encroachment of non-B class uses. The current status of employment land in the district and the advice within the emerging *EDNA* is summarised in Appendix A of the Topic Paper.

6.1096.110   There is recognised future demand for sustainable employment land in the district to become available as the demand from businesses for floorspace is increasing year on year, as identified in the *Economic Development Needs Topic Paper 2017* and the *Employment Land Study Update 2014*. We will need to carefully consider our strategy for delivering land for employment uses over the next 20 years, given that there is a need to provide further land for businesses and balance this with the delivery of new homes.

What are the realistic options?

6.1106.111   There are a number of potential options to support economic growth in the district over the next 20 years.

3.81

Option	Justification
A. Develop specific policies for each employment site to protect certain uses	This would reflect the recommendations within the *EDNA Topic Paper 2017* to continue to promote the allocated employment sites, predominantly for business use. The *Employment Land Study Update 2014* recognises that there has been an increase in leisure uses on some sites which could detract from their impression as 'successful' business locations, such as Brook Road industrial estate. Rochford Business Park also does not have a business ('B class') focus.
B. Reconsider the allocation of Rawreth and Star Lane industrial estates back to employment	These two industrial estates were reallocated for residential use as they were considered to be 'bad neighbour' sites. However there has been no interest to date (as of October 2017) in delivering new homes on these sites. The *EDNA Topic Paper 2017* also considered that they are generally well occupied and suggests that they could be reallocated back to employment use to support the existing activities. The impact on our strategy for delivering new homes for the future however, would need to be carefully considered. Also see Option C below.
C. Review new employment land allocations that do not have planning permission	Three new sites have been allocated for employment land up to 2025. We are required by the *NPPF* to reconsider whether sites have a reasonable prospect of being delivered. Sites should not just be carried forward into a new plan. • Land to the north west of London Southend Airport in Rochford – The majority of this site is in the process of being delivered, although a reserved matters application has not yet been received for the site (as of October 2017). The remainder of the site however is being promoted for residential uses, despite commercial interest in developing the site to support local employment opportunities in accordance with our *Core Strategy* and *JAAP*. Consideration could be given to reallocating this part of the site to Green Belt. • Michelins Farm in Rayleigh – There has been commercial interest in this site and, given its strategic location, it is expected that this site will be delivered for employment use over the current plan period (up to 2025). The *Employment Land Study Update 2014* notes that it is located within the strongest commercial market sub-area of Rayleigh and provides an accessible and visible development opportunity.

Option	Justification
	• Land south of Great Wakering – Given the absence of interest in redeveloping the existing employment land at Star Lane, and its continued occupation by vibrant businesses is it not envisaged that this site will come forward for employment use over the plan period. There is however commercial interest in developing the new allocated land in the *Allocations Plan* for business use.
D. Retain current strategy and allocate additional employment land	The *EDNA 2017* recognises that in addition to our current strategy for delivering new homes and jobs in the district, there is a further need to identify land for employment uses to support local economic growth in the future. Given the lack of interest in delivering new homes on Rawreth and Star Lane industrial estates in particular to date, parts of this strategy may need to be reviewed.
E. Promote improvements to quality of building stock and intensification of existing sites	The *Employment Land Study Update 2017* notes that there are some opportunities to improve the quality of existing building stock (noting that some uses are more suited to a higher building quality) and some potential to deliver further units on the existing industrial estates, where appropriate.
F. Strengthen policy stance on access improvements	Both the *EDNA 2017* and the *Employment Land Study Update 2014* recognise that there are challenges with access to some employment sites. Purdeys industrial estate in Rochford in particular would significantly benefit from access improvements which could unlock potential opportunities to intensify the site.
G. Do not have a policy on employment land	This is not a feasible option as there is evidence of an increase in demand for industrial units and offices over the next 20 years. An increased supply of quality building stock on sustainable, well located sites is needed to meet this demand.

London Southend Airport

Tell Us More SP1.9: How do we continue to support the prosperity and development of London Southend Airport over the next 20 years?

Where are we now?

6.1116.112   London Southend Airport is a regionally significant airport that is located within the district. It has the potential to be a focus for economic growth, and activity as

recognised in the *Environmental Capacity Study 2015*, not simply in terms of aviation-related industries, but also as a catalyst for wider forms of employment which would benefit from being in proximity to a thriving airport. Given its importance to the region, we worked together with Southend Borough Council to produce a joint plan to manage – and benefit from – the growth of this facility. *Core Strategy* policy ED2 sets out the high-level principles for the *London Southend Airport and Environs Joint Area Action Plan (JAAP)*. This policy supports the delivery of the *JAAP* in conjunction with Southend Borough Council to manage the growth of London Southend Airport, deliver a skills training academy, and additional employment land. *Allocations Plan* policy NEL3 identifies the exact area of land that the *JAAP* covers. The *JAAP* was adopted in 2014, and sets out planning policies for this specific area up to 2031. London Southend Airport has grown from just over 4,000 passengers a year in 2010 to over a million in 2014, with expectations to serve two and half million passengers per year by the end of 2018[30]. This growth has been managed through the *JAAP* which sets out controls on the number of possible night flights per month and strict noise controls on aircraft operating from London Southend Airport have been introduced for example.

6.112 6.113   It was recognised that linkages with the Southend Victoria to London Liverpool Street railway line needed, in order to improve the ease of connectivity for users of London Southend Airport, and the importance of the X1 and X30 bus services to reduce the number of people travelling in their own vehicles to London Southend Airport and encourage use of public transport. Greater Anglia are working with London Southend Airport to address concerns with the scheduling of train services and enhancing the customer experience of the four stations within the district.

6.113 6.114   Whilst the *JAAP* sets out policies for London Southend Airport, it also details opportunities to support the development of a new Business Park to the north of Aviation Way industrial estate and north west of the airport. An outline planning application for the Airport Business Park with access off Cherry Orchard Way in Rochford was approved in March 2016, which included floorspace to deliver predominantly office (B1) and light industrial (B2) uses with over 7,000sq.m. set aside for other complementary uses. This application covers the majority of the land identified in the *JAAP* for a new Business Park, with the exception of Area 1. Southend Borough Council, as the landowner for this site, has been successful in bidding for funding through the Government's Local Growth Fund to assist in the delivery of the Business Park, including a new access road and roundabout off Cherry Orchard Way in Rochford, improvements to walking and cycling, and the delivery of an innovation centre. As of October 2017 a reserved matters planning application has not been submitted.

What are the identified issues?

6.114 6.115   Improvements to road access around London Southend Airport – on the local road network – are needed to continue to support its role in the local economy as an important catalyst for growth. *Core Strategy* policy T2 seeks to prioritise improvements within the vicinity of London Southend Airport; and includes improvements to surface access to the airport. However a recent bid by Essex County Council to the Government's Local Growth Fund to improve access along Sutton Road in Rochford

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[30] London Southend Airport Annual Report 2016–2017
southendairport.com/corporate-and-community/community-reports

was unsuccessful. Improvements to the local road network in the district are therefore required and this should remain a priority as London Southend Airport continues to thrive. The *NPPF* recognises that we need to have appropriate strategies to support growth, and need the necessary investment in infrastructure to support it.

6.1156.116   There are wider concerns about the capacity of the strategic road network, namely the A127 which is a vital route into and out of the district. Improvements are needed to this route to ensure that this route does not hinder the economic growth potential of the district or the wider sub-region of South Essex. Although we are not the highway authority, we work closely with Essex County Council who delivers this function and neighbouring local authorities who are similarly affected and potentially constrained by the capacity of the strategic road network. Options for improvements to the local and strategic road network are considered further in the 'Delivering Infrastructure' chapter.

What are the realistic options?

6.1166.117   There are four options that have been identified in relation to London Southend Airport.

Option	Justification
A. Retain and update the *Core Strategy* policy supporting London Southend Airport's growth	*Core Strategy* policy ED2 is considered to be appropriate in supporting this key economic driver in the district. However it could benefit from updating as the *JAAP* has now been prepared.
B. Retain the existing policy in the *Allocations Plan*	*Allocations Plan* policy NEL3 sets out the area that the *JAAP* covers, which is fit-for-purpose.
C. Retain the existing policies in the *JAAP*	The *JAAP* is considered to be fit-for-purpose in setting out appropriate controls on the operations at London Southend Airport up to 2031. The *JAAP* is also beginning to deliver significant new employment land to the north west of London Southend Airport and associated access improvements.
D. Continue to support surface access improvements in and around London Southend Airport	*Core Strategy* policy T2 seeks to prioritise the improvements of the roads providing surface access to London Southend Airport. This can include not only local roads, but also the strategic road network such as the A127. This is still a priority, and could be included within any future Community Infrastructure Levy (CIL) or similar.

Supporting Tourism and Rural Diversification

Tell Me More SP1.10: How do we support green tourism and rural diversification across the district in the future?

Where are we now?

6.117 6.118 Our district is a place that has a diverse environment characterised by substantial spaces of unspoilt, attractive countryside; a rich heritage including many iconic and historical buildings, and our villages and market towns are supported by strong, vibrant communities. We identified an opportunity to enhance the district's economy through the promotion of tourism and have an ambition to maximise tourism's contribution to the local economy, employment and quality of life.

6.118 6.119 Visit Essex is the County's official tourism organisation and the only body specifically marketing the whole of the county to the visitor market. The visitor economy offers opportunities to deliver our local priorities. Nationally one third of all new jobs created between 2009 and 2011 were in tourism. The sector directly employs over 1.3 million people, with many jobs being at entry level or part time jobs, offering much needed opportunities for 16-24 year olds not in employment, education or training (NEETs) and parents of young children looking to return to work. In Essex tourism contributes £3 billion to the local economy, employing 55,000 people. It is estimated that there are 41 million visitors to Essex, the majority being day visitors.

6.119 6.120 The River Crouch Coastal Community Team[31] was established jointly by Rochford and Maldon District Councils in September 2015. It aims to encourage greater local partnership working in coastal areas. The Team brings together local stakeholders, especially those involved in any form of tourism, visitor and leisure sectors to work together for the benefit of the people and the community.

6.120 6.121 There is potential for tourism to deliver economic benefits. Transport and accessibility are vitally important for tourism. However, public transport is often limited within areas with rural tourism potential and that other factors, such as the need for rural regeneration, need to be given weight. Infrastructure is vital to future development and needs to be incorporated into the long term future activities, including better road connectivity and cycle routes, and is considered further in the 'Delivering Infrastructure' chapter.

6.121 6.122 National policy supports the development of sustainable tourism and leisure uses that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside (*NPPF* paragraph 28). It also makes specific reference to supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres. An example of this would be the RSPB's Wallasea Island Wild Coast Project located to the east of Canewdon.

6.122 6.123 The district is predominantly Green Belt (this is considered further in 'Protecting and Enhancing our Environment' chapter), which places restrictions on the scale and types of uses that may operate within those areas outside the existing settlement

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[31] https://www.rochford.gov.uk/river-crouch-coastal-community-team-0

boundaries. However there is recognition that diversification into other forms of economic activity is necessary for rural businesses to remain viable and continue to thrive in the longer term. This diversification can also support local tourism. Our principal policy on tourism in the *Core Strategy* (policy CLT11) supports rural diversification and schemes in rural areas which, despite having limited public transport access, would have positive benefits in terms of rural regeneration.

6.1236.124   *Core Strategy* policy GB2 advocates a balanced approach to support certain forms of rural diversification and recreational uses in the Green Belt in appropriate circumstances. Rural diversification includes proposals to convert buildings to bed and breakfasts/small-scale hotels or for small-scale outdoor leisure and recreational activities. The overall aim of supporting such activities is to encourage green tourism in the district – an approach which is supported in the *Environmental Capacity Study 2015*. This broad policy is supplemented by policies within the *Development Management Plan*; providing more detail on acceptable proposals for rural diversification (policy DM12), the conversion of existing agricultural and rural buildings in the Green Belt (policy DM13) and the appropriateness of green tourism proposals (policy DM14). Equestrian facilities (depending on their size and scale) are also considered to be appropriate in certain circumstances taking into account the impact on the Green Belt as detailed in policy DM15.

What are the identified issues?

6.1246.125   There is a recognised need to support the rural economy in the district whilst striking the appropriate balance with the openness of the Green Belt. There have been a number of applications and enquiries about rural diversification opportunities in the district in the last few years, which demonstrates that there is a desire for rural businesses to diversify into other areas; including bed and breakfasts, self-catering accommodation and wedding venues. A significant issue is to ensure that there is not a clustering of such uses that would undermine the purposes of the Green Belt. Another issue is to ensure that those venues are of a substantial quality.

6.1256.126   There are a limited number of facilities to enable people to stay in the district, for example short weekend breaks; including bed and breakfasts, small hotels, and temporary camp sites. The potential impact of any proposal on the Green Belt – particularly openness – is a fundamental consideration however.

6.1266.127   The availability of broadband in more rural areas is a constraint to the development of tourism in the district; nowadays visitors need access to promotional and other material electronically to help them navigate around (although paper copies are still important). Broadband coverage is patchy in the rural parts of the district; although the Superfast Essex project[32] is working to improve coverage in the county. Our approach to broadband is considered in more detail in the 'Delivering Infrastructure' chapter. This is a particular issue raised during our early engagement with local communities in 2016. Brown tourism signs were also raised; however these are covered within the 'Detailed Policy Issues' chapter.

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[32] www.superfastessex.org/

What are the realistic options?

6.127̶6.128   Three different options for tourism and rural diversification have been identified.

Option	Justification
A. Continue to support current defined forms of green tourism and rural diversification as set out in our current policies	Our current approach is set out in *Core Strategy* policy GB2 and *Development Management Plan* policies DM12, DM13, DM14 and DM15. The number of applications and enquiries that have been received about rural diversification opportunities has increased in the last few years. There is a need to support rural businesses in the longer term as the rural economy changes.
B. Expand the current approach to include other forms of rural diversification	The range of applications and enquiries received since 2011 have gone beyond those that current policy advocates as appropriate forms of diversification, for example wedding venues. Such activities could be considered appropriate provided they would not have an undue negative impact on the Green Belt. This is similar for temporary camp sites, which could encourage short stay trips in the district, provided they were appropriately located, sensitively managed and would not undermine the purposes of the Green Belt.
C. Do not support rural diversification	Rural diversification – if sensitive to the setting of the natural and historic environment – can help support the rural economy and provide local employment opportunities. This is not considered to be an appropriate option; and is not an approach supported by the *NPPF*.

3.88

7   Supporting Commercial Development

Strategic Priority 2: The provision of retail, leisure and other commercial development

Introduction

7.1   We have three individual town centres located to the west of our district, each providing for the local shopping and leisure needs of their communities. These are complemented by a number of smaller village and neighbourhood centres. Our area is steeped in history which provides a unique setting for each of our town, village and neighbourhood centres. The environment within which we live, work and socialise can have a positive impact on the health and well-being of our residents.

7.2   Changes of use from retail to other uses within town centres in particular was raised as a concern through the early community engagement in 2016,, as well as ensuring that shop frontages respect the Conservation Area status of many of our town and village centres. However, given our location close to larger commercial centres in South Essex, including Southend, Basildon and intu Lakeside, Chelmsford City in Mid Essex and our easy access to London, this poses challenges for ensuring that our more local-serving centres, which meet the needs of our communities, continue to not only survive, but thrive.

Retail, Leisure and Town Centres

Tell Us More SP2.1: How do we plan for an appropriate mix of retail, leisure and other uses within our town centres in the future?

Where are we now?

7.3   The district's town centres of Rayleigh and Hockley contain a good range of shops, services and facilities to meet the needs of our local communities. Generally empty units do not pose a big issue across the district, and in the main, empty units are not empty for long before being brought back into use. However, more recently Rochford has experienced a decline in services, including the loss of the town's two banks and supermarket.

7.4   Rayleigh is our principal town centre as identified in the *Core Strategy* with the most comprehensive range of facilities and an established night time economy. Hockley and Rochford's town centres are classed as smaller town centres catering for local needs. The Airport Retail Park to the south of London Southend Airport is also located in the district. The *Core Strategy* sets out a number of policies to strengthen the role of our town centres whilst ensuring that our village services are sustained. Policies RTC1 and RTC2 promote a sequential approach to retail development in the district to support our town centres. Each of our town centres is supported by an *Area Action Plan* which provides a planning framework to guide their evolution and security their future prosperity.

7.5   The NPPF and PPG requires Local Planning Authorities to assess the needs for retail and leisure to inform Local Plans, and to meet these needs as far as possible. Existing

evidence in the *Retail and Leisure Study Update 2014* highlights that the amount of expenditure retained for goods that we do not often buy (comparison goods, such as cars) is generally lower than for goods that are bought frequently (convenience goods, such as food) in the three town centres. This reflects the tendency of customers to do food shopping locally; whilst for comparison shopping, customers are more likely to shop around and/or travel longer distances to visit larger centres that have more choice. The study found that our district's ability to increase its comparison goods market share will be constrained by larger centres in South Essex.

7.6 This 2014 Study forms the basis of a more strategic study commissioned for South Essex. A *South Essex Retail Study* has been prepared to provide a broader overview of retail and leisure needs across the sub-region. The *Retail and Leisure Needs Topic Paper* 2017 draws out the key findings from the emerging *South Essex Retail Study* for Rochford District. This study confirms that the district has the highest rate of convenience expenditure leakage of all the South Essex authorities. Similarly, expenditure leakage for comparison shopping is the second highest in South Essex.

7.7 Rayleigh is the main shopping centre in the district. The town serves its own residents and nearby villages, and competes primarily with the other medium sized town centres, such as Wickford in Basildon Borough and Hadleigh in Castle Point Borough. Just under half the floorspace in the town is for convenience goods. The *Retail and Leisure Study Update 2014* highlights that the retention of convenience goods expenditure in the town is reasonable, and has the highest comparison goods average sales density, which reflects the stronger presence of national chain stores, compared to Hockley and Rochford. The study recommends that Rayleigh should continue to be designated as a town centre. *Core Strategy* policy RTC4 sets out the high-level principles for the *Rayleigh Centre Area Action Plan*. This *Area Action Plan* was adopted in 2015 and establishes a detailed planning framework for the town, defined by identified character areas given the town's heritage.

7.8 Rochford is a smaller town centre that serves a more localised catchment than Rayleigh, including the town itself and smaller rural catchments providing a range of shops and non-retail services. Around two-thirds of floorspace in the town is for convenience goods as noted by the *Retail and Leisure Study Update* in 2014, although spending retention for convenience goods is relatively low; and the town's principal supermarket closed in early 2017. The *Retail and Leisure Study Update 2014* recommends that Rochford should continue to be designated as a town centre based on the number, scale and type of shops and services available. Rochford has a thriving community led Town Team which was awarded Heritage Lottery Funding in 2016 to develop a heritage trail and promote the town and its heritage. The *Rochford Town Centre Area Action Plan 2015* is heritage led and sets out the principles that any future schemes in the town should follow.

7.9 Hockley is a small town centre which serves the town and some smaller rural catchments. The majority of floorspace in Hockley is for convenience goods, although spending retention for these goods is lower than Rochford. The *Retail and Leisure Study Update 2014* however recommends that Hockley should continue to be designated as a town centre. The *Hockley Area Action Plan 2014* seeks to strengthen the retail role of the town; this is an approach which is supported by the *Retail and Leisure Study Update 2014.* This *Area Action Plan* builds on the existing strengths of Hockley and sets out the key planning principles for its future.

7.10 The planning framework for our town centres recognises that people make town centres vibrant and seeks to encourage people to visit the town centres by ensuring that they are attractive, accessible and contain a variety of uses. The *Retail and Leisure Study Update 2014* recommends that the district should seek to increase its market share of comparison retail expenditure; however, it is limited by developments in neighbouring areas. Improvements to future provision could help to claw back some additional expenditure leakage out of our district and to retain its current market share.

7.11 More recent projections set out in the *Retail and Leisure Needs Topic Paper 2017* suggest that by 2037 there is likely to be a need for at least 10,792 square metres (net) of comparison floorspace in the district, with at least 880 square metres (net) of convenience floorspace. The exact provision is likely to depend on the number of new homes the district is able to accommodate over the new plan period; aligning retail provision with population will have a positive impact on the sustainability of settlements.

7.12 In terms of commercial leisure uses, the *Retail and Leisure Study Update 2014* considers potential demand for cinema, tenpin bowling, bingo, nightclubs, private health and fitness clubs, casinos and catering, pubs and bars.

- Cinema – The study considers that there is theoretical scope for a small, independent niche cinema, if the district can attract 20% of cinema trips from within the district itself, as echoed in the *Retail and Leisure Needs Topic Paper 2017*. The commercial viability of a cinema is questionable given the proximity of large cinemas in Basildon and Southend however.

- Tenpin bowling – The study suggests that current provision should meet the future needs of residents over the next 20 years. Bowling facilities in Southend and Basildon will also limit the commercial potential in the district.

- Bingo – The study considers that in theory the district could support one bingo hall, however existing facilities in Basildon, Canvey Island and Southend are likely to reduce the commercial viability of new facilities in the district.

- Nightclubs – The study highlights that there are two nightclubs in Rayleigh, and residents also have access to a large number of nightclubs in Southend. This suggests that there is limited potential for large nightclubs in the district.

- Private health and fitness clubs – The study suggests that there is an adequate supply of gyms and health clubs within the district for the foreseeable future.

- Casinos – The study notes that there are no casinos in the district, but Southend has two casinos, and so it is unlikely that the district would have a catchment population large enough to support a casino. It is also likely that casino operators would prefer to locate in Basildon or Southend.

- Catering, pubs and bars – The study recommends that there is a potential requirement for an additional 3,000 square metres (gross) of Class A3/A4/A5 floorspace in the district up to 2034, with the priority for Class A3 (restaurant/café) within Rayleigh and Hockley.

7.13 Paragraph 23 of the *NPPF* states that planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. The *Area Action Plans* have been adopted following the publication of the *NPPF*. These plans are considered to meet the requirement of national policy in promoting vibrant and viable town centres, building on the individual characters and strengths of our towns.

What are the identified issues?

7.14 The district is in proximity to a number of significant neighbouring town centres which act as a draw for those looking for a specific retail or leisure experience as recognised by the *Retail and Leisure Study Update 2014*, for example Southend and Basildon have a wide range of shops and have other attractors such as cinemas and ten-pin bowling. Just two venues within the district reach the top 2,500 venues in the UK – Rayleigh and London Southend Airport Retail Park – based on the number of leading multiple retailer brands present (as ranked by Venuescore).

7.15 Southend, Chelmsford and Basildon town centres are at the top of the shopping hierarchy in Mid/South Essex with significant competition from intu Lakeside shopping centre. Whilst it is beneficial for our residents to have good access to a choice of larger retail and leisure centres, this however means that the outflow of retail expenditure from the district, particularly comparison goods, is significant and this is likely to remain high in the future. To complement the district-wide *Retail and Leisure Study Update 2014*, the emerging *South Essex Retail Study* explores the relationship between the different retail centres and will provide a broader context on the retail needs of the sub-region.

7.16 Future improvements to comparison retail provision within the district could help to claw back some additional expenditure leakage. However, major developments in neighbouring authorities will limit the ability of shopping facilities in the district to increase their market share of expenditure. Some retail development will be necessary in the district however in order to maintain existing market share in the future.

7.17 We found during the early community engagement in 2016 that residents would like to see their town centres protected from any change of use that may occur, replacement shops should be a 'like-for-like' swap. Some changes of use can also have a potential impact on public health; for example, clustering of fast food outlets (Class A5 uses) located near schools. It has also been brought to our attention through the early engagement that the visual appearance of some shop frontages is not up to Conservation Area standards. Whilst we can manage the visual appearance of frontages within these areas, without the co-operation of landowners, there are limitations on rectifying past developments which can undermine the character of Conservation Areas. In terms of changes of use there are also limitations on our control due to permitted development rights which enable certain changes of uses without the need to apply for planning permission.

7.18 Small supermarkets in the district have an important role to play in providing day-to-day top-up shopping to residents in villages and more rural parts of the district less accessible by public transport, especially for our ageing population. Larger supermarkets that are located both within town centres and on the outskirts still provide an option for weekly shopping and are generally well used. Although it is worth

acknowledging that shopping habits have changed and many residents make use of online food shopping with it either being delivered to the home or click and collect from the store without going inside. Nationally this has seen a decline in the large scale out of town major supermarket developments and more recently a reduction in 24 hour opening.

7.19 Transport infrastructure capacity is also limited within our town centres in the district which could have a detrimental impact on businesses. Parking is important within the town centres, although there is limited free parking available. Subsequently out of town shopping areas can act as a draw away from traditional town centres through offering extensive free parking where land is more widely available.

What are the realistic options?

7.20 There are five options that have been identified for the district's town centres.

Option	Justification
A. Retain current *Core Strategy* policies	The broad town centre policies within the *Core Strategy* are considered to be appropriate in directing retail development to the district's town centres through the sequential approach supported by the *NPPF*.
B. Retain current policies in the *Rayleigh Centre Area Action Plan*	The area specific policies within the *Rayleigh Centre Area Action Plan* are considered to strike an appropriate balance between promoting the vibrancy and vitality of the town and facilitating appropriate development opportunities whilst respecting the historic character of Rayleigh.
C. Retain current policies in the *Rochford Town Centre Area Action Plan*	The area specific policies within the *Rochford Town Centre Area Action Plan* are considered to strike an appropriate balance between promoting the vibrancy and vitality of the town and facilitating appropriate development opportunities whilst respecting the historic character of Rochford.
D. Retain current policies in the *Hockley Area Action Plan*	The area specific policies within the *Hockley Area Action Plan* are considered to strike an appropriate balance between promoting the vibrancy and vitality of the town and facilitating appropriate development opportunities whilst respecting the individual character of Hockley.
E. Review the town centre *Area Action Plans*	These plans were adopted post-publication of the *NPPF* and *PPG* and are considered to be fit for purpose. In addition, opportunity sites and employment land identified in the plans have been assessed within our evidence base.
F. Do not have policies on town centres	This approach is considered to be contrary to the *NPPF* and is not considered to be appropriate.

Villages and Local Neighbourhood Centres

Tell Us More SP2.2: How do we continue to support local facilities in our village and neighbourhood centres?

Where are we now?

7.21 Local centres generally include a small range of shops of a local nature, such as a small supermarket, newsagent, post office and pharmacy, which serve the local community. The *Core Strategy* sets out a number of policies to strengthen and ensure our village services are sustained. We have many more shops and services located outside of the established town centres, dotted throughout residential areas in our towns and villages. Local centres in the district have an important role to play in providing day-to-day shops and services that are available to residents in villages and more rural parts of the district less accessible by public transport, especially for our ageing population. The *Retail and Leisure Study Update 2014* recognises that the facilities at Hullbridge, Great Wakering, Canewdon and other villages are more limited and serve local catchment areas. The study recommends that other village centres should continue to be designated as local centres.

7.22 The *NPPF* recognises the importance of maintaining a network of retail centres in areas. The smaller centres in the district should – as recommended in the *Retail and Leisure Study Update 2014* – continue to perform a more local function meeting day-to-day shopping and service needs. *Core Strategy* policy RTC3 seeks to protect retail uses within residential areas and will only permit the loss of such retail uses where it has been clearly demonstrated that a retail use in the location is not viable and that the proposed alternative use will still offer a service to the local community that meets day-to-day needs. It also supports the provision of new facilities as part of schemes for new homes coming forward, which do not undermine the current provision nearby. This is an approach which is encouraged through the *Allocations Plan* within schemes to the north of London Road in Rayleigh (policy SER1), and to the south west of Hullbridge (SER6), which is also supported by the *NPPF* (paragraph 38).

7.23 Further guidance on the treatment of local shops is set out in *Development Management Plan* policy DM36. It is recognised that it may be appropriate to change the use of premises to a use that would provide a similar service for local residents or convert a premises for alternatives uses, where a lack of demand for the current use has been demonstrated. Our current policies support the retention and enhancement of small rows and parades of shops. Policy DM36 supports the conversion of units from retail to non-retail in certain circumstances, but not to residential. It does however support the conversion of non-retail units – such as offices, hair dressers, takeaways and pubs – to residential in exceptional circumstances with the aim of retaining these locally important services.

What are the identified issues?

7.24 There is a requirement to deliver new homes to meet needs – and it is important that we look to utilise potentially available land within the existing residential area wherever possible and appropriate. However this should not be to the detriment of local shops and services which perform an important function in meeting the day-to-day needs of local communities.

7.25 Similar to town centres, the *NPPF* at paragraph 69 promotes strong neighbourhood centres and active street frontages to contribute to healthy communities. In terms of supporting prosperous rural communities, the *NPPF* promotes the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship (paragraphs 28 and 70 in particular).

7.26 We therefore need to ensure that village and neighbourhood shops are protected from changes of use which would undermine their purpose in providing for the day-to-day shopping needs of local residents, particularly proposals to convert shops to residential. Non-retail uses also perform an important function in supporting local shops and should be retained wherever possible. We also need to work in partnership with healthcare providers to ensure that core services such as GP surgeries, dentists and other health facilities can continue to meet the needs of the local population.

What are the realistic options?

7.27 There are three options that have been identified for village and neighbourhood centres.

Option	Justification
A. Retain existing *Core Strategy* policy	*Core Strategy* policy RTC3 which seeks to protect local shops in village and neighbourhood centres is considered to be appropriate, as it promotes more sustainable shopping/travel patterns. Local top-up food shops provide a lifeline for those without access to public or private transport.
B. Retain existing *Development Management Plan* policy	*Development Management Plan* policy DM36 sets out circumstances when conversion from retail to non-retail, and non-retail to residential may be considered appropriate. This policy is considered to be fit-for-purpose in further supporting the retention of local facilities.
C. Do not have a policy on village and neighbourhood centres	This approach is considered to be contrary to the *NPPF* and is not considered to be appropriate.

8   Delivering Infrastructure

Strategic Priority 3: The 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)

Introduction

8.1   Infrastructure is essential to support local communities and facilitate local economic growth. The equality of infrastructure in terms of services and facilities is challenging across the district given that we have such a large rural area to the east, which can mean that isolation becomes an issue. The west of the district, whilst still in need of infrastructure improvements, is markedly better connected than the more rural east. The rural areas of the district to the east of Rochford often have limited services and facilities including poor broadband access. This, coupled with poor public transport links, can make it difficult for those that do not have a car to access the services and facilities they need.

8.2   Any scheme – whether that is for the delivery of new homes or new jobs – will inevitably have some impact on local infrastructure, and it is the responsibility of the planning system to identify what is needed to support a particular development. However this extends beyond just the need to consider local infrastructure within our district, but also how we relate to infrastructure, such as roads, schools, open spaces and healthcare, within other areas of South Essex and what impact we may have on these services and facilities. It is an important issue for those who may be affected by schemes coming forward through the planning system; and is a concern that has been raised throughout early engagement with local communities in 2016. Our *Infrastructure Delivery Topic Paper 2017* sets out our current position in relation to infrastructure requirements for planned growth up to 2025. This will be updated and further refined, through working closely with infrastructure and service providers, as we develop our plans for the future of our district to become an Infrastructure Delivery Plan (IDP).

Highways Infrastructure

Tell Us More SP3.1: How can we prioritise and deliver improvements to the strategic and local highway network over the next 20 years?

Where are we now?

8.3   The western extent of the district in particular is well located in relation to three strategic roads, namely the A127, A130 and A13. The A127 and A13 provide access to London, a key employment generator and commuter hub, and the wider area via the M25, and the A130 provides access to north Essex and beyond (see Figure 10). There are four train stations serving Rayleigh, Hockley and Rochford, with a dedicated station for London Southend Airport on the London Liverpool Street to Southend Victoria line.

Figure 10: The main local and strategic roads serving our district
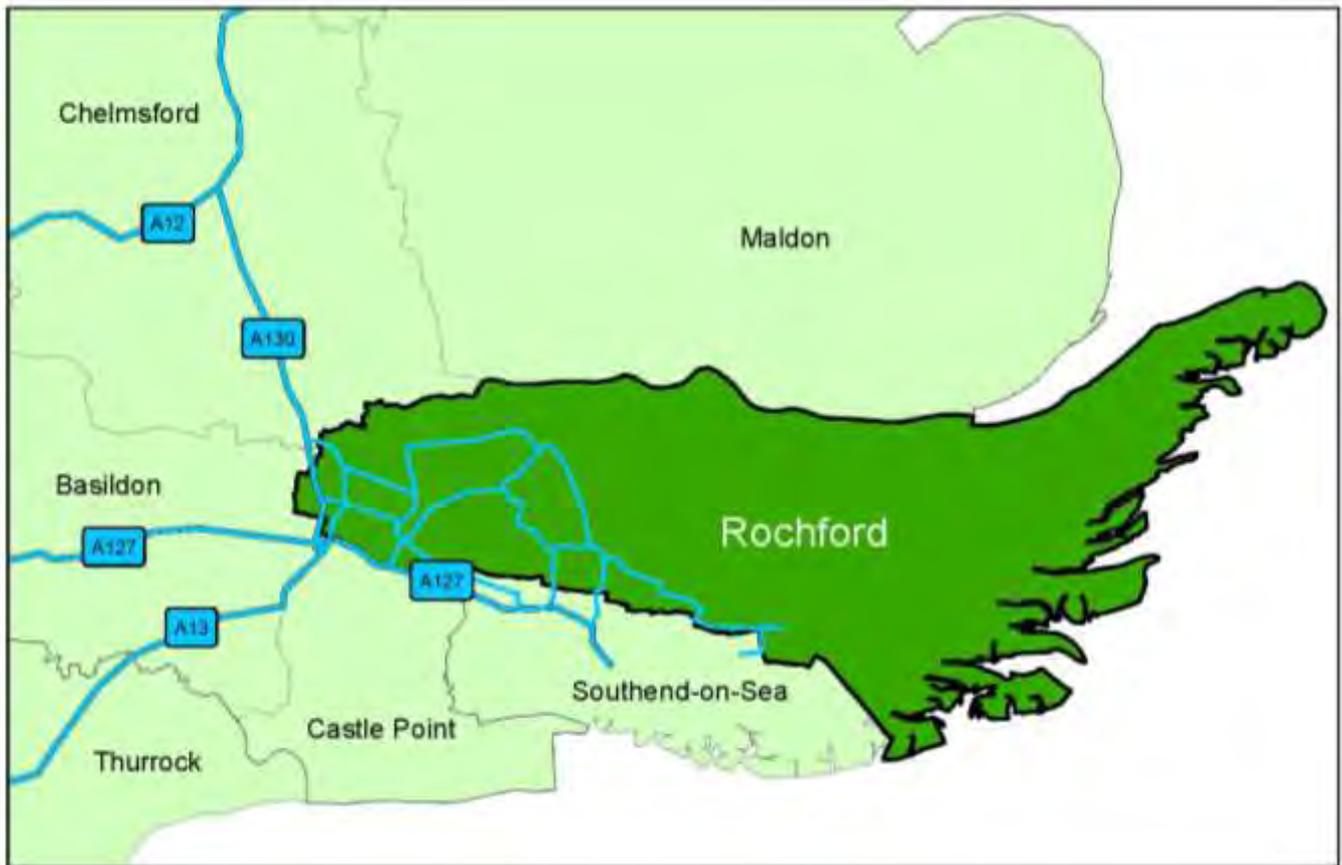
8.4 Although the district is well served by train stations, there is a high level of car ownership in the district with 63% of commuters travelling by car or van compared to 16% by train, as identified in the *Highways Baseline Technical Note*. This means that there is a high level of out-commuting to employment locations outside the district, most notably London. In total over 14,000 people commute to work elsewhere in the country. Essex County Council is the Highway Authority for the district and is responsible for the maintenance and improvement of the local and strategic highway network.

8.5 Car dependency and the impact of commuting on the local and strategic highway network is recognised within current policy, and through the balanced approach seeks to direct development towards appropriate locations around the highest tiers of settlements. Each of the allocated sites for new homes (set out in the *Core Strategy* and *Allocations Plan*) is required to deliver local improvements to the highway network; these have been and will continue to be secured through the planning application process. Other localised improvements are identified in the *Area Actions Plans.* However, due to the nature of planning, improvements are limited to those that are directly related to a development site, and are proportionate to the impact of the scheme alone. This is a requirement which is controlled by legislation.

8.6 Any scheme that is delivered can only mitigate its own impact; it cannot rectify any existing deficiencies. The *NPPF* (paragraph 32) is also clear that "development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe." On-site highway improvements and

enhancements to nearby junctions, for example, would be acceptable, whereas any major off-site improvements or financial contributions to deliver improvements elsewhere – depending on the scale of impact from a scheme – would not be acceptable. We are however working to deliver a Community Infrastructure Levy (CIL) charge on schemes in the future, which would mean that financial contributions could be sought from different types of development to potentially contribute to the network improvements beyond a development area.

8.7   It is recognised that there are issues associated with a high car dependency population and high levels of out-commuting in the district. We have worked with Essex County Council as the Highway Authority for the district to prepare a baseline position on the local highway network to illustrate on a district-wide basis where there are current issues. The *Highways Baseline Technical Note* sets out the existing condition of the network which will be used to inform future modelling of the network and identify potential mitigation options which will assist in taking forward the plan-making process.

8.8   However whilst the district benefits from access to the strategic highway network, our location in the south east of Essex is constrained by neighbouring boroughs and the Thames Estuary to the south, the north sea to the east and the River Crouch to the north, which offers somewhat limited opportunities for enhancing accessibility without substantial sums of investment. We recognise that there are issues with the function and capacity of the strategic highway network and junctions – particularly the A127 and key junctions such as Rayleigh Weir and the A127/A130 Fairglen Interchange.

8.9   We are, and will continue to, work closely with Essex County Council, and neighbouring authorities, to seek all opportunities for funding the necessary improvements. Essex County Council, for example, has successfully secured a commitment of £27m to deliver improvements to the A127/A130 Fairglen Interchange from the South East Local Enterprise Partnership (SELEP) through the Local Growth Fund supported by Essex County Council capital funding.

What are the identified issues?

8.10   There are a number of outlying villages and rural employment opportunities in the east of the district. There is a need to improve east to west connections to reduce this divide and ensure that rural employment opportunities remain visible and viable. This includes the area to the north east of Canewdon which is home to Baltic Wharf and Essex Marina, and the RSPB's Wild Coast Project at Wallasea Island. It also includes the area to the south of the River Roach in proximity to Great Wakering.

8.11   On both the local and strategic highway network there are recognised congestion and capacity issues. With the local routes there are issues of through traffic. Our adopted *Core Strategy* policy T2 identifies key areas of concern in relation to the east of Rayleigh and Rochford, and the west of Hockley, where commuters are likely to be drawn through the town centres to reach the employment destinations of Southend, Basildon and Chelmsford. This in turn could have a detrimental impact on the local environment and health.

8.12 Rayleigh town centre south towards the A127, for example, was designated an Air Quality Management Area (AQMA) in February 2015[33] due to annual mean levels of nitrogen dioxide(NO_2) marginally exceeding the nationally prescribed level. This is considered in more detail in the 'Protecting and Enhancing our Environment' chapter. However, one of the measures to assist with reducing the annual mean levels of nitrogen dioxide (NO_2) within the town centre – identified within the Air Quality Action Plan (AQAP) – includes consideration of a bypass for the town. Consultees recommended consideration be given to a bypass around the town, however the AQAP notes this would likely entail very high costs and long timescales. Also the scale of the problem in the town centre does not justify a bypass but the AQAP does recognise that this could be an option to mitigate highways impact of planned development in the future.

8.13 There is a lack of resilience on the local highway network, in particular incidents such as large volumes of traffic queuing at key junctions and stationary vehicles, or obstacles along main routes impacting on the capacity of the network and causing congestion. This has an impact on journey times and the ability of residents to not only reach their destinations in a timely manner, but in some cases to leave their villages or towns. Residents expressed concern, for example at the community engagement workshop in Hullbridge in 2016 about access for emergency vehicles but also exiting the village in general. Traffic management and parking are other issues which need to be considered, and are discussed in the 'Detailed Policy Considerations' chapter.

8.14 There is an issue of through-traffic across the district between Rochford, Hockley and Rayleigh in particular on the B1013. Traffic is also drawn through the district to go northwards towards Chelmsford and elsewhere in the north of the county to, for example, access Watery Lane which is not part of the strategic highway network.

8.15 Specific junctions and roads have been highlighted by local communities through the early community engagement programme, which took place in 2016, as areas of concern they would like to see addressed. These areas have also been broadly identified in the *Highway Baseline Technical Note* and include (but are not limited to) the following highways:

- Ashingdon Road
- Barling Road
- Rawreth Lane

- Hall Road / Ashingdon Road / West Street junction
- Barrow Hall Road
- London Road

- South / West / North / East Street junction
- Spa Road roundabout
- Pooles Lane

- Cherry Orchard Way/ Hall Road roundabout
- Watery Lane / Lower Road junction
- Rayleigh town centre (including Websters Way, Eastwood Road, Crown Hill)

- Lower Road / Ferry Road roundabout
- Sutton Road / Purdeys Way junction

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[33] https://www.rochford.gov.uk/environment/air-quality/air-quality-management-area-aqma

- Warners Bridge junction (although this just outside Rochford District in Southend Borough)
- Carpenters Arms roundabout to Fairglen Interchange on A127

8.16 A number of the district's railway bridges have also been identified as 'pinch points' for both vehicles and pedestrians in the *Highway Baseline Technical Note*, for example the rail crossings at Hall Road in Rochford, Spa Road in Hockley and Rectory Road in Hawkwell.

8.17 The A127 is a key strategic highway serving South Essex providing an important east to west connection between Rochford District and Basildon, Castle Point and Southend Boroughs, which has known capacity and congestion issues. Essex County Council and Southend Borough Council's joint strategy *A127 – Corridor for Growth – An Economic Plan 2014 is* a Route Management Strategy for this strategic route. This strategy acknowledges the importance of this route to the South Essex economy and the maintenance and improvements necessary for this key artery to continue to support the local economy in the future. An options assessment report for the A127 is currently being developed. Improvements are taking place at Kent Elms junction in Southend Borough and upgrades have been completed at the Rayleigh Weir junction on the borders of Rochford District. There are also major improvements planned for the A127/A130 Fairglen Interchange to improve the function and capacity of the junction over the longer term, although there is a recognised need for a joined up approach across South Essex to support improvements to the A127. This is a particularly important element of the Duty to Co-operate, which is a legal requirement, as set out in the *Duty to Co-operate Topic Paper 2017*.

8.18 We need to continue to work with neighbouring local authorities and Essex County Council as the Highway Authority to promote strategic and more localised improvements to the highway network. Any improvements can be identified through the new Local Plan. Basildon Borough Council have, for example, identified the potential for a new link road from the A127 at Pound Lane to link to the A130 in Rochford District.

8.19 Surface access to London Southend Airport has also been identified as in need of improvement as set out in *Core Strategy* policy T2 (considered further in 'Delivering Homes and Jobs' chapter). Improving access on both the local and strategic highway network is vital to supporting economic growth and the continued prosperity of the district and wider South Essex area. There are a number of options that have been identified to improve the local and strategic highway network. However it is important to acknowledge that although improvements may need to be made there are limited funds available which could deliver improvements to the local highway network; particularly if significant improvements to the strategic network are also sought.

What are the realistic options?

8.20 There are four options that have been identified for the local highway network.

Option	Justification
A. Retain current policies on the local highway network	*Core Strategy* Policy T1 sets the broad approach to ensuring localised improvements to the local highway network as schemes are proposed. It also identifies particular improvements to the east to west highway network, and the area serving Baltic Wharf for improvements to support rural employment opportunities. *Core Strategy* Policy T2 identifies specific roads and junctions for improvement which are supported – some of which have been secured (for example improved access to King Edmund School, Rochford and Rayleigh Weir junction). This aspect of the policy could be updated, depending on the outcome of future modelling work.
B. Prioritise local highways and junctions between Rayleigh, Hockley and Rochford (B1013), to support and direct funds to improve the local highway network	It is recognised that there is an issue of through-traffic on the B1013 between the three town centres, which has a negative impact on the capacity of key junctions across the local highway network at peak times. Funding – for example through CIL – could be used to deliver improvements to the local highway network between the three towns. This could be informed by detailed future modelling of the highway network and the development of a Route Management Strategy.
C. Prioritise local highways and junctions by upgrading the east to west connection north of Rayleigh, Hockley and Rochford, to support and direct funds to improve the local highway network	The route from Rawreth Lane in Rayleigh or Watery Lane in Hullbridge along Lower Road is a well used route which bypasses the three town centres, and provides an informal, alternative route into a number of towns and villages across the district. This could be considered through detailed future multi-modal modelling of the highway network as an option to alleviate issues particularly within Rayleigh town centre, as suggested within the Air Quality Action Plan.
D. Do not have a specific policy on the local highway network	This would involve just relying on localised improvements as part of any new development coming forward through the planning application process. This may also mean that resources would be focussed solely on seeking improvements to the strategic highway network. However there are recognised issues with the local highway network which need to be resolved to increase capacity and reduce congestion where possible. This would be contrary to the *NPPF* and is not considered to be a suitable option.

8.21 We will need to work with Essex County Council and Southend Borough Council, as the relevant Highway Authorities, to develop a transport model for South Essex, which covers the length of the A127. There are two options identified for the strategic highway network.

Option	Justification
A. Support improvements to the strategic highway network	Essex County Council is the highway authority for the district, and is responsible for the A127 west of the Progress Road junction. Improvements are taking place at the Rayleigh Weir junction to the south of Rayleigh. Funding has been secured for future improvements to the A127/A130 Fairglen Interchange junction to the south west of Rayleigh. This will require land adjacent to the junction to facilitate these improvements, which can be allocated through the new Local Plan. Other improvements may also be identified through the multi-modal modelling work for the district and South Essex.
B. Do not have a specific policy on the strategic highway network	There are recognised issues with the strategic highway network that need to be addressed through cross-boundary working between the relevant highway authorities – in particular Essex County Council and Southend Borough Council. This is not considered to be an appropriate option to address this cross-boundary issue, which is also important for the Duty to Co-operate.

Sustainable Travel

Tell Us More SP3.2: How can we improve sustainable travel choices across the district to deliver realistic and meaningful travel options for our communities over the next 20 years?

Where are we now?

8.22 Whilst there is a desire to encourage a modal shift towards alternative, more sustainable ways to travel, the economic and social importance of car usage in the district should not be underestimated. It is also recognised that people cannot be forced to not use their cars; however we must try to give local communities the option to use alternatives ways to travel where they can. Alongside seeking improvements to the local and strategic highway network to ensure there is adequate highway infrastructure to support the needs of the district in the future, sustainable ways to travel – such as passenger and public transport, walking and cycling – will continue to be promoted. These alternative ways to travel are realistic longer-term options for the district, which can have a positive impact on local congestion, emissions and air quality (specifically within the Rayleigh Air Quality Management Area). This in turn can have a positive impact on the health and well-being of local communities.

8.23 Passenger transport services are the responsibility of Essex County Council, which delivers a valuable service to support those most in need in our communities. This includes transportation for vulnerable children, older people, those with learning disabilities and physical and sensory impairments to facilities around the county, and bus services for pupils to and from school. Essex County Council also supports and funds some commercially unviable services which are considered to be important for local communities, where possible. We will need to continue to work with Essex County Council to ensure that passenger transport meets the needs of our communities over the next 20 years, with a particular need to support our ageing population.

8.24 Public transport is another valuable service for those who do not have access to a private vehicle, particularly within the more rural areas of the district, and is supported within our *Core Strategy* (policy T3). A number of bus operators serve the area including the X30 which provides connections between Southend, London Southend Airport, Rayleigh, Chelmsford and London Stansted Airport. There are other local bus routes connecting the majority of the district's towns and villages to larger towns and facilities, including hospitals and shops in neighbouring areas such as Southend and Basildon. Our current policies seek to deliver improvements to existing public transport service delivery, for example through the extension or rerouting of existing routes and enhancements to associated infrastructure such as bus stops.

8.25 The existing routes through the district are illustrated in Figure 11 below.

Figure 11: The existing bus network and train stations in the district
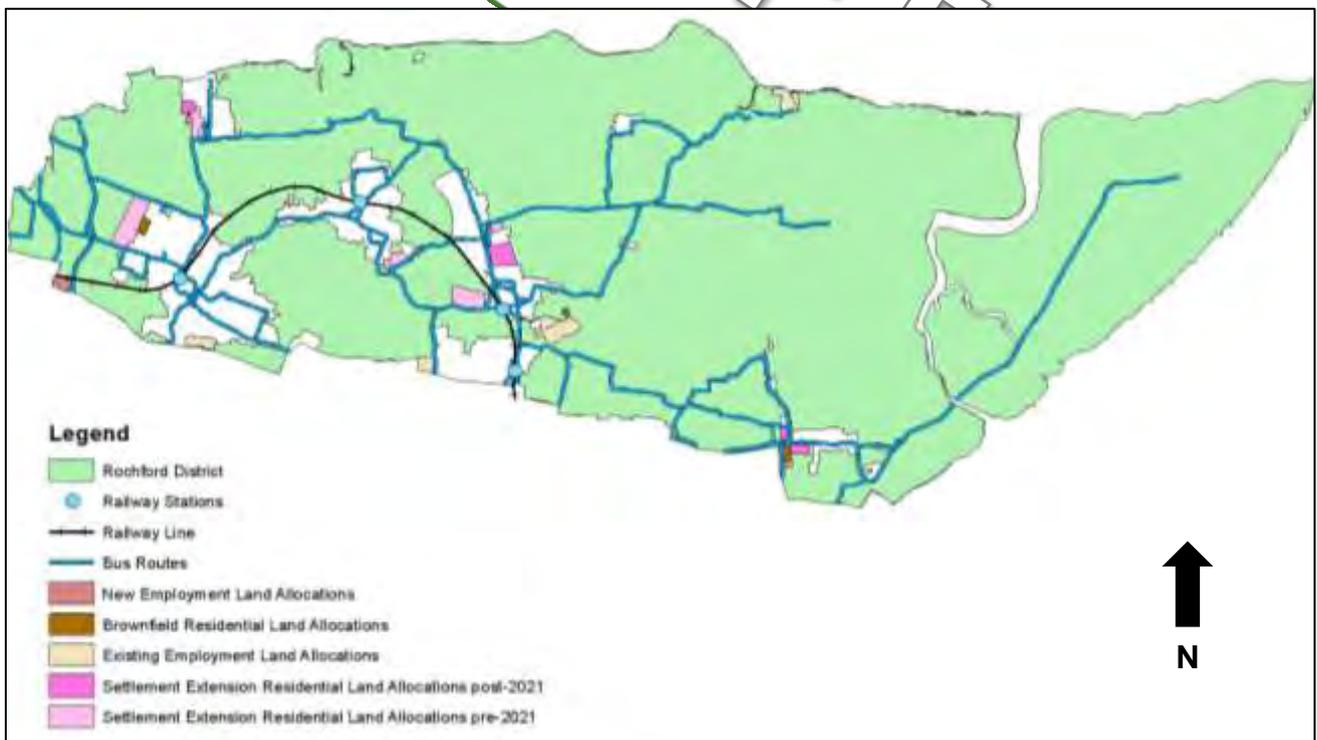
8.26 There are also four train stations in the district, one in each of the main towns and a dedicated station for London Southend Airport which opened in 2011. Public transport provision (both bus and train) in the district are privately operated which means that there is a limit as to how much we can influence the level of provision – although it is recognised that some bus routes are funded by Essex County Council. We will,

however, continue to work with relevant providers to promote better services for our communities to provide a realistic and viable alternative to private vehicles for commuting and other journeys, to reduce congestion and associated problems. This may require further co-operation with other areas in South Essex and beyond.

8.27 There are a number of existing cycling routes across the district but these are largely fragmented. There are routes along Ashingdon Road, Hall Road and Cherry Orchard Way in Rochford, although this is not continuous, and a partial route along Hullbridge Road between Hullbridge and Rayleigh. Increased opportunities for walking as well as cycling not only provides health and leisure benefits, but can also help reduce car dependency for certain journey types. Cycling was noted by residents, through the early community engagement programme in 2016, to have health benefits. Improvements to walking and cycling provision are supported within *Core Strategy* policy T6, and should be fully integrated into schemes to encourage communities to cycle wherever possible. Encouraging cycling within and through Rayleigh town centre are, in particular, supported to drive improvements to local air quality in this area, for example improved cycling storage.

8.28 Our current policies seek to support the creation of a safe and convenient network of routes to link homes, workplaces, services and town centres; as well as developing a network alongside the district's rivers. A spine route through the district, and improved connectivity around London Southend Airport, has been identified in the *Core Strategy* and *London Southend Airport and Environs Joint Area Action Plan*. Building on this, a number of studies have been prepared to further refine the potential route across the district, predominantly focussing on off-road routes where possible[34]. Further routes to improve safe cycling opportunities in the eastern part of the district are also being explored to connect a number of the towns and villages and local employment opportunities, and green spaces.

8.29 Essex County Council, as the Highway Authority, is supportive of sustainable transport and has prepared an *Essex Cycling Strategy*[35] for the county which aims to improve the attractiveness of cycling and increase its uptake as a reasonable alternative form of travel to the car. This will be supplemented by an Action Plan for the district which will provide more detail on specific proposals at the local level.

8.30 Travel plans for schemes are required to promote more sustainable travel, where possible. *Core Strategy* policy T5 requires schemes for 50 or more new homes, and any other types of developments generating trips such as schools and leisure uses, to prepare travel plans. However, Essex County Council's Sustainable Modes of Travel Strategy (August 2016) requires residential travel plans for schemes of 250 homes or more, or where there are existing problems (in line with Essex County Council's *Development Management Policies*, policies DM9 and DM10). Also, Essex County Council's guidance *Helping you create a Business Travel Plan (December 2016)* which establishes a threshold of 50 employees or more as a result of the development of new business premises or extensions to existing business premises – or where there will be a significant impact on the local road network, or where existing problems exist. There does however need to be a more cohesive approach to ensure that

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[34] www.rochford.gov.uk/new-local-plan-evidence-base
[35] www.essexhighways.org/Getting-Around/Cycling/cycle-strategy.aspx

sustainable travel options – bus and rail, walking and cycling connectivity – are better integrated into all schemes to give real choice to residents.

8.31 The Rayleigh Town Centre Air Quality Action Plan (AQAP) considers different measures that could be implemented to improve air quality within the town centre. This plan recommends that our current policies could be amended or reviewed. A key cause of air quality issues is from congestion and emissions from road traffic as recognised in the *Environmental Capacity Study 2015*. This study recommends several mitigation measures to counteract any potential increases in vehicle movements, including highway improvements, particularly to reduce congestion, and promoting more sustainable ways to travel. Air quality is considered in more detail in the 'Protecting and Enhancing our Environment' chapter.

8.32 We also have a policy on promoting green infrastructure in the district (*Core Strategy* policy T7) through the provision of specific greenways across into neighbouring areas; these were identified through the *Green Grid Strategy*. Green infrastructure is considered in more detail in the 'Supporting Health, Community and Cultural Facilities' and 'Protecting and Enhancing our Environment' chapters.

What are the identified issues?

8.33 The district has high car ownership, and many rural communities are reliant on private transport due to the lack of frequent and reliable alternatives. During the early community engagement programme in 2016, a number of specific issues were identified across the district in relation to sustainable travel choices for communities, including:

- Conflict between walkers and cyclists along Ashingdon Road in Rochford/Ashingdon

- Cycle paths could be provided for example along Southend Road in Rochford; Ironwell Lane in Hawkwell; Shopland Road in Rochford; and in Canewdon and Hockley

- Need to provide appropriate facilities for cyclists

- Improvements to condition of footpaths along the river Crouch, particularly around Hullbridge are needed

- Amendments to certain bus routes are needed, such as rerouting to avoid the Market Square in Rochford

- Impact of buses serving King Edmund School in Rochford on Great Wakering / Little Wakering / Barling

- Improved access to secondary schools for children in Hullbridge such as free bus service

8.34 Bus and rail facilities (other than passenger transport) are privately owned which can limit our ability to influence improvements; these may also be limited by existing infrastructure. We have a significant number of train stations in the district, and there is interchange between bus and rail services, but this could benefit from improvement, for example in relation to London Southend Airport; the new Airport Business Park in Cherry Orchard Way, Rochford; Rochford Market Square; Rayleigh High Street, as

well as at the three town centre train stations. The frequency of bus and rail services is summarised within the *Highways Baseline Topic Paper 2017*. There are also issues at the South Essex level with poor north to south public transport connectivity. To make passenger and public transport an attractive, reliable and viable option for local communities in the future, we will need to carefully consider where we seek to locate new homes and jobs; ensuring that they are well related to existing public transport hubs or networks to promote sustainable travel, or have the potential to develop new hubs or routes. Providing better bus facilities in particular would offer greater choice to those looking to access local employment opportunities across the district, and subsequently benefit local economic growth. We could consider setting a more challenging mode share, for example 30/30/40 (public transport/walking and cycling/private vehicle).

8.35 We will continue to work with relevant private and public transport providers and Essex County Council to promote better services throughout the district; and improve connectivity between different transport modes. This could consist of a review of current routes to increase residents' use of local services or through planning obligations or a Community Infrastructure Levy (CIL) charge on schemes in the future to deliver improvements. This could mean that financial contributions could be sought from different types of development to potentially contribute to the network improvements beyond a development area and secure improvements to routes, including bus stop facilities. We will also need to work in partnership with Essex County Council and Southend Borough Council, as two of the Highway Authorities in Essex, as well as other neighbouring areas, to develop an improved passenger transport offer for our district, which connects to the wider area and meets the needs of our communities.

8.36 Opportunities for walking between homes, schools, local jobs and bus and rail connections are particularly well used in our towns. However, opportunities are more limited in the rural areas of the district although there are numerous public footpaths available for leisure use. Cycling on the whole is more challenging in the district, due to narrow roads within many of our towns and fast, winding country roads in the more rural eastern areas of the district. This can create conflict between cyclists and other road users. There are some off-road routes in the district but these tend to be fragmented. The *Environmental Capacity Study 2015* recognises that promoting efficient movement of through-traffic and to encourage more sustainable transport and movement in the South Essex area, as a whole, is a challenge. It recommends that this should be considered on a sub-regional transport impact assessment scale. The *Core Strategy* supported the provision of a South Essex Rapid Transit (SERT) system as set out in policy T4, although this has not come to fruition.

What are the realistic options?

8.37 Seven options have been identified to support sustainable travel.

Option	Justification
A. Retain the current policy on public transport	The policy on public transport is considered to broadly be appropriate in promoting and supporting the connectivity of schemes to the public transport network as set out in *Core Strategy* Policy T3. However, consideration should be

Option	Justification
	given to whether this could be strengthened to ensure that public (and passenger) transport is a key consideration and is fully integrated into all schemes. Improvements to public transport interchanges in key locations across the district and north/ south public transport connectivity across the wider South Essex area should also be supported. This could be supported by a more comprehensive review of public transport and options for improvement to encourage a shift in the way people travel around the district (and beyond) in the future.
B. Support the development of a rapid public transit system for South Essex	We have a current policy on the South Essex Rapid Transit (SERT) which was envisaged as a network of priority bus routes to connect Basildon, Southend, Thurrock and London Gateway Port, and other key development sites and services (*Core Strategy* Policy T4). This could still be an option considered to be appropriate at the South Essex level, but would require effective co-operation and a clear business case to demonstrate viability over the longer term.
C. Retain the current policy on travel plans	*Core Strategy* Policy T5 requires new schools, visitor attractions, leisure uses and larger employment schemes to prepare and implement travel plans. Schemes over 50 homes are required to prepare a travel plan. This policy could benefit from updating to reflect Essex County Council's guidance on employment sites in order to take a proportional approach to the requirement for business travel plans. However, it is not considered to be appropriate to increase the threshold for residential travel plans to 250 homes or greater given that the majority of schemes for new homes in the district tend to be below this threshold and would not be captured by an amended policy.
D. Lower the threshold to require travel plans to be prepared for schemes under 50 homes	Only schemes over 50 homes are required to prepare a travel plan within *Core Strategy* Policy T5. If we consider smaller sites to deliver new homes as part of our strategy to deliver new homes in the future, this could have a cumulative impact. The *NPPF* requires schemes which would generate significant amounts of movement to prepare a plan; our policy could be applied to more schemes, which cumulatively could have an impact.
E. Retain the current policy on walking and cycling	Our current policy on walking and cycling is considered to be fit for purpose in promoting these alternative modes of

Option	Justification
	travel within schemes (*Core Strategy* Policy T6). Studies have been and will continue to be developed to explore the potential for new routes within the constraints of the existing highway network. We will continue to work closely with Essex County Council on the development of the *Rochford Cycling Action Plan*. The policy may need minor amendments as this plan progresses however, for example in response to local air quality issues. This could include strengthening the requirement for cycling storage at destinations.
F. Do not have policies on sustainable travel	This approach would involve not supporting improvements to public transport, walking or cycling in policy – particularly the more rural east, and would be contrary to the *NPPF*.

Communications Infrastructure

> **Tell Us More SP3.3: How do we support and deliver improvements to the communications infrastructure across the district over the next 20 years?**

Where are we now?

8.38 There is an increasing reliance on digital technology for many aspects of our everyday life, including buying goods and services, and running businesses. Fibre broadband – which can deliver much faster internet speeds than more traditional connections – is becoming integral to enhancing our quality of life and improving the performance, and competitiveness, of businesses. It can enable more people to work from home and work remotely, encourage enterprise and innovation in business growth and enable home businesses to develop. It can also reduce the need to travel. Access to broadband can support the education and skills development for those still at school – as well as those wishing to access higher, or further, education. It can also be used to access public services and healthcare services, and promote tourism opportunities (such as attractions or accommodation) to a wider potential audience.

8.39 Broadband connection speeds can vary significantly across the district; with much lower speeds found in more rural areas. As of October 2017, 90.5% of the district has superfast broadband coverage – defined in the UK as over 24 Mbps – which is a significant increase from 2011[36]. This follows the publication of *Britain's Superfast Broadband Future*[37] setting out the Government's vision for improved broadband coverage throughout the country which included a commitment of £530m for Broadband Delivery (BD) UK to invest. This commitment has continued, with over £1 billion of new funding to boost the UK's digital infrastructure being committed by the Government in the 2016 Autumn Statement.

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[36] Think Broadband district profile and speed test sample mapping available from: www.thinkbroadband.com
[37] www.gov.uk/government/publications/britains-superfast-broadband-future

8.40 Superfast Essex is a scheme co-ordinated by Essex County Council, as part of the national Superfast Britain programme. The scheme aims to extend fibre broadband coverage to 97% of Greater Essex by the end of 2019. As part of the Superfast Essex scheme, areas of the district have been identified for fibre broadband roll-out, including parts of Canewdon, Foulness, Great Wakering, Hockley, Hullbridge, Rawreth, Rayleigh and Sutton parishes. Improvements to fibre broadband coverage are planned for every parish in the Rochford District by 2019. As of August 2017, 82.71% of homes and businesses in the district now have access to fibre broadband, with a further 12.57% planned to be covered by 2019 and 2.9% additional premises are either existing or planned by providers whose claim is currently under review.

8.41 Our current policy – relating to telecommunications infrastructure in general – is set out in our *Development Management Plan* within policy DM6. It addresses issues particularly in relation to the location, design and siting of such infrastructure to ensure that there is adequate provision whilst (particularly in rural and potentially sensitive areas) balancing this against potential impacts on the built and natural environment. This approach is supported by the *NPPF* (paragraph 43 in particular).

What are the identified issues?

8.42 *Development Management Plan* policy DM6 addresses telecommunications infrastructure in general, but does not specifically refer to broadband. Given that access to fast and reliable broadband is now seen as an essential part of everyday life – at home, at work and at school – it is pertinent to have a policy which refers specifically, and in appropriate detail, to the provision of broadband infrastructure. This will ensure that broadband is a requirement for all new commercial and residential schemes in the district.

8.43 The availability and reliability of fast broadband varies across the district. Some rural areas, in particular, have poor or no broadband connectivity, which may have an impact on both the quality of life of residents, and the willingness of businesses to locate in such areas. This was an issue raised by residents in the more rural parts of the district during our early community engagement in 2016. Such areas may benefit from Superfast Essex and similar roll-out schemes, but policies may need to consider how rural connectivity can be improved, including requiring new developments in these areas to incorporate suitable broadband infrastructure.

What are the realistic options?

8.44 Four options have been identified for communications infrastructure.

Option	Justification
A. Retain the existing policy on telecommunications infrastructure	The existing policy is considered to be generally fit for purpose, and provides a sufficient basis for the determination of a planning application relating to telecommunications infrastructure. However the existing policy does not take a proactive approach to new technologies, and in particular lacks specific reference to broadband infrastructure.

Option	Justification
B. Amend the existing policy to include specific reference to improving broadband and mobile coverage	As stated above, the existing policy is sufficiently comprehensive and detailed providing the necessary guidance to successfully determine a planning application, however it is very passive. The policy could be made more proactive to seek to improve broadband and mobile coverage in areas designated as lacking for the benefit of the local and rural economies and communities. The policy has room to expand in order to introduce a standard requirement for new developments to install fibre-to-premises cables during their construction to ensure that all new developments for homes and businesses have suitable broadband provision to future proof them. As an alternative a new policy could be developed specifically to address the issue of broadband and enable flexibility to take into account any technological advances.
C. Ensure that all commercial and residential developments over a certain threshold are conditioned to deliver appropriate broadband infrastructure	Ensuring that all commercial and residential developments, above a threshold, provide broadband infrastructure would help to ensure that the basic needs of the future occupants of these buildings are met with regards to broadband connectivity. One way to achieve this would be through the use of a condition attached to any relevant planning consent which requires agreement of details relating to the provision of broadband infrastructure as part of, and serving, the approved development.
D. Do not have a policy on telecommunications infrastructure	We could rely on national policy for guidance on development of telecommunications infrastructure in the district, however a specific local policy strengthens our ability to ensure that any proposed telecommunications infrastructure is sensitive and acceptable, and may help to deliver improvements to the wider telecommunications connectivity of the district.

Water and Flood Risk Management

Tell Us More SP3.4: How do we address water and flood risk management over the next 20 years?

Where are we now?

8.45 Development within areas at risk of river and sea flooding should be avoided (flood zones 2 and 3) as defined by the Environment Agency through the application of the sequential and exceptions test outlined in national policy. We have a *Strategic Flood Risk Assessment* (SFRA) for South Essex which is a requirement of national policy which assesses the flood risks posed and outlines the main hazard zones in order to

further aid the planning process. However due to changes in the Environment Agency's climate change allowances, this is in the process of being updated as part of a joint project with neighbouring authorities.

8.46 The Environment Agency has also worked with other local authorities in Essex and Suffolk to produce a *Shoreline Management Plan*. The *Shoreline Management Plan* is a high level document that forms an important element of the strategy for flood and coastal erosion risk management. As noted within the *Environmental Capacity Study 2015* the *Essex and South Suffolk Shoreline Management Plan* policy is to hold the line with maintaining or upgrading defences along the coast. We are committed to working with the Environment Agency to ensure that the district continues to be subject to an appropriate level of protection. The Coastal Protection Belt is considered in more detail in the 'Protecting and Enhancing our Environment' chapter.

8.47 Flooding can result in significant damage to properties and threaten human life. To counteract these risks, the *NPPF* requires that flood risk is taken into account at all stages of the planning process. In plan-making, Local Planning Authorities apply a sequential approach to site selection so that any development is, as far as reasonably possible, located where the risk of flooding (from all sources – including surface water, groundwater, tidal and fluvial) is lowest, taking into account climate change and the vulnerability of future uses to flood risk.

8.48 We seek to avoid inappropriate development by appraising, managing and reducing the risk in the areas prone to flooding, as set out in the *Core Strategy*. Policy ENV3 enforces the principle that we seek to direct development away from areas at risk of flooding, and does so by applying the sequential test and exceptions test, where necessary. Proposed development on previously developed land located in flood zone 3 will however be permitted if it enables a contribution towards our requirement for new homes that would otherwise require the reallocation of Green Belt land, providing it can pass the necessary tests and accommodate flood defence infrastructure.

8.49 Parts of the district are also susceptible to surface water flooding which can result from heavy or prolonged rainfall events overloading existing drainage systems, and fast run-off over impermeable surfaces which prevents the water from infiltrating into the ground. A *South Essex Outline Water Cycle Study* was prepared in 2011 which identifies key constraints on housing and employment growth planned within Basildon Borough, Castle Point Borough and Rochford District that may be imposed by the water cycle and how these can be resolved. The *Environmental Capacity Study 2015* recommends that the *Water Cycle Study* is updated to take account of any additional new homes that may be planned for in the future. Similarly, the *South Essex Surface Water Management Plan 2012* sets out a co-ordinated approach to managing surface water within South Essex (encompassing Basildon Borough, Castle Point Borough and Rochford District).

8.50 Sustainable Drainage Systems (SUDS) offer an alternative approach to drainage within developed areas, which are promoted within our *Core Strategy* and *Development Management Plan*. SUDS can help to reduce flooding by controlling surface water run-off as close to the source as possible, before the water enters the watercourse. SUDS features include above ground infrastructure such as swales, filter strips, basins, ponds and wetlands etc., and below ground infrastructure such as pipes, soakaways and underground storage structures. Such systems can also protect water

resources and improve wildlife interests of developments. Any development should also not increase water pollution.

8.51 *Core Strategy* policy ENV4 requires SUDS to be incorporated into all residential schemes of more than 10 homes. However, there may still be occasions where smaller developments have the potential to give rise to concerns in respect of surface water flooding, particularly in areas that have been identified as being susceptible to such flooding, including through *Surface Water Management Plans* which identifies a number of critical drainage areas (CDAs) in the district. New developments cannot address any pre-existing surface water flooding issues, as set out in the *Surface Water Management Plan*, although financial contributions could be sought to improve surface water drainage infrastructure through a standard CIL charge for example (considered in more detail below).

8.52 Other instances where there may be a perceived risk of surface water flooding include where historical instances of such flooding have been documented. *Development Management Plan* policy DM28 therefore requires schemes of 10 homes or fewer to submit a flood risk assessment where there is a perceived risk of flooding from surface water run-off, to ensure that the risk is appropriately managed. Essex County Council is the Lead Local Flood Authority and is responsible for overseeing the management of local flood risk including groundwater flooding, surface water (rainfall) runoff, or ordinary watercourses (streams and ditches). Essex County Council has also produced a *Sustainable Drainage Systems Design Guide*[38] in 2016 to assist in the design of schemes. SUDs should also be required on all major schemes, not just residential however.

8.53 The impact of climate change on water supply is a factor that needs to be taken into consideration. The *Environmental Capacity Study 2015* notes that there is a surplus of supply in the Essex Water Resource Zone, and that water resources are adequate for proposed and additional growth, and without any adverse effects on ecological quality. The Study also considers water treatment, and recognises that there are two waste water treatment facilities in the district, which are not likely to have any capacity constraints up to 2032. There is however uncertainty about the capacity of the facility in Southend.

What are the identified issues?

8.54 Flooding can cause significant damage to property and endanger human life – both from watercourses and from surface water run-off. Concerns about both coastal and surface water flooding were raised by residents during the 2016 early community engagement programme.

8.55 The Environment Agency is responsible for advising on schemes that are potentially within flood zone 2 or 3. Parts of Great Wakering and other existing settlements are in areas at risk of flooding as defined by the Environment Agency. It would not be appropriate to relocate these affected areas due to the detrimental impact this would have on community cohesion and the viability of such an approach. Nonetheless, we continue to work closely with our partners to safeguard the flood risk area, and direct

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[38] www.essex.gov.uk/Environment%20Planning/Environment/local-environment/flooding/View-It/Documents/suds_design_guide.pdf

development away from these areas wherever possible. The *Environmental Capacity Study 2015* highlights that there are coastal erosion threats in the district and a likely increased need for increased flood protection measures as result of climate change.

8.56 The type of flood risk defined by the Environment Agency's flood zones from rivers and the sea differs from surface water flooding but can sometimes be confused with these identified risk areas. Essex County Council's role as the Lead Local Flood Authority is to manage surface water flooding. This type of flooding tends to be more localised and happens quickly after a rainfall event, which means that it can be difficult to issue flood warnings. SUDS schemes that are implemented with any new development needs to ensure that any run-off as a result of the development would not increase above the level if the development had not occurred. Preferably the run-off levels would be reduced. The *Surface Water Management Plans* identify broad critical drainage areas to predict the likelihood of surface water flooding within an area. The *Environmental Capacity Study 2015* notes that the impermeable geology structure in the west of the district limits opportunities for some types of SUDS, however, there are a number of above ground options that can be implemented to mitigate against any risk.

8.57 The impact of any increases in water resource demand, waste water treatment capacity and any impact on the biodiversity of water quality (chemical and ecological) need to be considered, as recognised in the *Environmental Capacity Study 2015.* However the sensitivity of water resources is considered to be low, water quality low to medium sensitivity and water treatment and sewerage medium sensitivity. Flood risk on the other hand is considered to be high and medium sensitivity due to the coastal nature of the district.

What are the realistic options?

8.58 Four options have been identified in relation to minimising flood risk.

Option	Justification
A. Retain the existing flood risk policy for coastal flooding	*Core Strategy* policy ENV3 aims to resist inappropriate developments in areas at risk of coastal flooding, wherever possible, following the sequential and exceptions test approach. The exception is some brownfield (previously developed) land. This is in line with national policy and is considered to be an appropriate policy position.
B. Revise *Core Strategy* policy ENV3	If this policy was revised, the brownfield (previously developed) land exception in flood zone 2 and 3 could be removed. However the approach in policy ENV3 is considered to an appropriate balance in certain circumstances to avoid development on greenfield land elsewhere.
C. Continue to apply SUDS policies	SUDS are crucial in keeping runoff and discharge rates similar to those that would naturally occur in order to mitigate possible flash flooding events. *Core Strategy* policy ENV4 sets out when schemes would be required to include a SUDS element. This is supplemented by *Development Management Plan* policy DM28 covers which

Option	Justification
	relates to smaller developments. These policies are considered to be fit-for-purpose in managing surface water flood risk from new developments, but could be combined into one succinct policy.
D. Do not have a policy on flood risk	This is not an appropriate approach and would be contrary to national policy.

Renewable Energy Generation

> **Tell Us More SP3.5: How can we continue to support and encourage renewable energy generation over the next 20 years?**

Where are we now?

8.59 Supporting alternative energy sources is important to help address climate change, and is an approach supported by national policy. There is a need to reduce energy and water consumption not only for the benefit of our local environment, but also for the global environment. We are keen to reduce the impact of any schemes on the environment through a variety of measures, including renewable energy. The *NPPF* also recognises that supporting such schemes can reducing vulnerability and improve adaptability to climate change.

8.60 Over the last five years there have been a few applications for the installation of solar panels on a scale not seen before in the district – including one in Canewdon and one to support London Southend Airport's operations. Any large-scale renewable energy scheme would need to be considered in terms of the potential impact on the landscape character and the ecological importance of where it is proposed, and any impacts on visual amenity, as set out in *Core Strategy* policy ENV6. We encourage small-scale renewable energy schemes, including additions to residential properties such as solar panels, photovoltaic cells and geothermal heat pumps. We would not; however, support biomass heating as these boilers can produce more pollution than similar gas-based systems. *Core Strategy* policy ENV7 supports such proposals taking into consideration the location, scale, design and other factors such as ecological impact.

8.61 New schemes have the potential to deliver secure, decentralised, renewable or low carbon energy sources, which are likely to be more cost effective to fit at the construction stage. Onsite renewable and low carbon energy generation are particularly encouraged for both residential and commercial schemes to lower emissions and reduce their carbon footprint. *Core Strategy* policy ENV8 requires schemes of five new homes or more, or 1,000 square metres or more to secure at least 10% of their energy from decentralised and renewable or low carbon sources (subject to viability).

8.62 The Rayleigh Town Centre Air Quality Action Plan (AQAP) considers different measures which could be implemented to improve air quality within the town centre. One such measure is encouraging the installation of electric vehicle charging points within new developments to promote the use of electric vehicles. There are however

currently very few electric vehicle charging points in the district. The provision of electrical upstands and outlets for the recharging of vehicles would typically not require planning permission, provided that certain restrictions on dimensions and siting are met. However, we do not currently have a policy to deal with any planning applications for charging points which exceed these allowances.

What are the identified issues?

8.63 Large scale renewable energy projects such as the installation of a solar or wind farm will likely require vast areas of land. Given that the majority of the district's open land is designated as Green Belt, and that significant areas are also protected for their historic, ecological or wildlife importance, any large scale project in these areas has the potential to cause significant harm to the preserved character, visual amenity or special ecological contribution that these areas possess. The purposes of the Green Belt such as the preservation of openness may also be difficult to maintain. The *NPPF* however at paragraph 91 notes that many renewable energy projects will be considered inappropriate development in the Green Belt. It would be up to the developer to demonstrate that very special circumstances merit such development.

8.64 Electric vehicles (EV) are becoming an increasingly more common sight on our roads, and with manufacturers diversifying the range of choice of electric vehicles, the trend for increased uptake is set. As a result, the means to charge these vehicles away from the home will become ever stronger. Monitoring the need for electric vehicle charging points in urban centre car parks needs to be ongoing to enable us to meet the need as and when it becomes high enough to be economically viable to install the charging points. As discussed above, the provision of an electric vehicle charging point would typically not require planning permission, unless certain restrictions on dimensions and siting were not met. However, it may be that changes to consumer trends mean planning applications for electric vehicle charging points increases.

8.65 The impact of electric charging points within existing car park spaces on the availability of parking for non-electric vehicles must also be considered. It may be that to introduce electric charging points where the demand is modest would displace other car park users and exacerbate parking issues. It is therefore important to ensure that the provision of electric vehicle charging points is appropriate and justified at the time of doing so. However, it must be noted that in cases where providing a charge point would be permitted development, there would be no scope to consider such an impact.

What are the realistic options?

8.66 Three options have been identified to support renewable energy provision within the district.

Option	Justification
A. Retain the current policies on renewable energy	*Core Strategy* policies ENV6, ENV 7 and ENV 8 are considered to be fit-for-purpose in addressing proposals for renewable energy generation and should be retained.
B. Include a specific policy on electric vehicle	As and when the need arises, which could be within the next plan period, our current policy could be amended or a

Option	Justification
charging points	new policy be proposed to manage the introduction of electric vehicle charging points in car parks and other appropriate areas such as new residential and employment developments.
C. Do not have a policy on renewable energy	Such an approach is not considered to be appropriate as national policy requires us to consider the impact of renewable energy schemes.

Planning Obligations and Standard Charges

> **Tell Us More SP3.6: How do we deal with planning obligations and standard charges to support the delivery of new homes and jobs over the next 20 years?**

Where are we now?

8.67 Promoting sustainable development is the key thrust of the *NPPF*. As part of this, we need to consider viability and the potential implications of any policy requirements on the deliverability of a scheme. This includes ensuring affordable housing provision, standards, infrastructure contributions, and other contributions (including financial), still provides a competitive return to landowners and developers (paragraph 173). This is recognised in the *Core Strategy*. The planning system enables us to require developers to make payments or undertake additional works to mitigate the impacts of new development, using a system known as 'planning obligations' involving a legal agreement between developers and local authorities (also known as a S106 agreement).

8.68 Guidance on appropriate planning obligations is set out in the *NPPF*. Paragraph 204 sets out three tests that any obligations must pass:

- necessary to make the development acceptable in planning terms;

- directly related to the development; and

- fairly and reasonably related in scale and kind to the development.

8.69 The *NPPF* (paragraph 203) emphasises that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. For conditions to be acceptable, where necessary, they need to be enforceable, precise and reasonable in all other respects (paragraph 206).

8.70 We have used planning obligations to secure the provision of infrastructure improvements, such as highway improvements, to meet education needs and to ensure affordable housing is delivered. There are concerns that planning obligations cannot address all the infrastructure deficiencies that will be caused by new development, particularly the incremental impact of smaller schemes, which individually do not warrant the provision of planning obligations, but have a significant cumulative impact. It was envisaged within the *Core Strategy* that we would produce a standard charges document under the Community Infrastructure Levy (CIL)

regulations, which would set out a simple formula to calculate the contributions for each scheme coming forward through the planning system. This is still our intention.

8.71 *Core Strategy* policy CLT1 sets out the requirement for developers to enter into legal agreements in order to secure planning obligations to address specific issues relating to developments, including requisite on-site infrastructure and the provision of on-site affordable homes. It also refers to the preparation of a standard charges document and the application of standard charges for certain types of infrastructure as detailed in Appendix CLT1. Our current position with regard to S106 agreements (and other secured funding sources for infrastructure) is detailed within our *Infrastructure Delivery Topic Paper 2017*. This topic paper also sets out our approach to engaging with infrastructure and service providers, which we are required to do in a proactive, on-going manner as required under the Duty to Co-operate. More information on the Duty is set out in our *Duty to Co-operate Topic Paper 2017*.

What are the identified issues?

8.72 Any planning obligations required from new development must meet the three tests set out in the *NPPF* to be acceptable. In particular they need to be directly related to a development to mitigate the expected impacts of the development itself, and cannot be used to rectify existing infrastructure deficiencies. Viability is a key consideration.

8.73 The *Housing White Paper* supports small and medium-sized house builders, and the delivery of small and medium-sized sites to deliver new homes more quickly than larger house builders. However, small schemes may not merit us to require planning obligations to make the development acceptable which means that the cumulative impact of such schemes cannot be captured and effectively mitigated against. This is an issue which has broadly been raised during the programme of early community engagement we undertook in 2016. Similarly even if a standard charge was in place, it is not guaranteed that these funds would be spent on specific infrastructure related to a specific scheme, as any funds must be spent on agreed infrastructure projects in line with the CIL regulations, which could be anywhere across the district depending on prioritisation of projects. Any future changes to the CIL regulations will also need to be carefully considered and accounted for.

8.74 Certain infrastructure is more vulnerable than others to viability constraints within the planning system, in particular the requirement to deliver affordable homes. An appropriate balance therefore needs to be struck.

What are the realistic options?

8.75 Two options have been identified for planning obligations and standard charges.

Option	Justification
A. Retain the existing policy, and provisions in Appendix CLT1	*Core Strategy* policy CLT1 and Appendix CLT1 clearly set out when standard charges would be applied to schemes for which infrastructure types, although these may require updating. It is still considered to be a suitable approach to acquiring funds to direct infrastructure improvements across the district. It is still our intention to prepare a

Option	Justification
	standard charges document.
B. Do not have a policy on planning obligations and standard charges	It is necessary to continue to set out our position on planning obligations and standard charges – particularly our intention to prepare a standard charges document. The current policy however may require updating.

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9   Supporting Health, Community and Culture

> **Strategic Priority 4: The provision of health, security, community and cultural infrastructure and other local facilities**

Introduction

9.1   Our residents need good access to high quality healthcare, and facilities and infrastructure to support their health and well-being. As a Local Planning Authority we are responsible for ensuring that we work effectively with the relevant infrastructure, education and healthcare providers, including Essex County Council, to ensure that we effectively plan for the public health and education needs of our local communities.

9.2   Supporting the delivery of a network of infrastructure, community, education and healthcare facilities across our district – as well as the wider South Essex sub-region – can have positive benefits for our residents. Access to green open space is also an important community resource that is essential to supporting the health and well-being of our residents. We need to ensure that any new schemes to deliver homes and jobs are well designed and deliver environments which the public feel safe to use, and are accessible by different ways to travel. This includes clear and legible routes through development, access to and within our green open spaces, and use of the public realm within our towns and villages.

Health and Well-being

> **Tell Me More SP4.1: How do we promote the health and well-being of our local communities over the next 20 years?**

Where are we now?

9.3   Health and well-being goes beyond the delivery of healthcare facilities; it is about improving public health through promoting and protecting the physical and mental health of communities. Within the planning system, this is about enabling health and well-being initiatives and integrating this into all aspects of schemes; for example enabling access to public open space is only one solution; we also need to encourage our residents to access them and take part in physical activity through ensuring that they are high quality, safe and accessible. Overall it is about ensuring the right conditions are in place to improve the health of communities through planning for and enabling the right type and quality of infrastructure to be put in place at the right time.

9.4   The *NPPF* seeks to promote healthy communities, and requires Local Planning Authorities to plan to deliver opportunities for different members of local communities to meet, and support safe and accessible environments through designing out crime, ensuring clear pedestrian routes, and high quality, active public spaces (paragraph 69). The importance of access to high quality open spaces – as well as opportunities for sport and recreation – are also recognised as being important for health and well-being (paragraph 73). Public health is interwoven throughout the *NPPF*, including promoting sustainable travel, reducing congestion, improving air quality and delivering high quality homes, which combined seek to effectively plan for and deliver healthy and inclusive communities.

9.5   Essex County Council is responsible for public health. Our current policy in the *Core Strategy* (policy CLT4) gives a clear steer on those schemes which would need to consider the potential impact on healthcare infrastructure in the district. Schemes looking to deliver 50 homes or more, and commercial and industrial buildings over 1,000 square metres would need to undertake a Health Impact Assessment, and propose suitable mitigation measures. This approach seeks to prevent, and address, potential health inequalities and promote improved public health and well-being opportunities. The identification of suitable sites for additional healthcare facilities, and the renovation or replacement of facilities in need of updating is also supported. In addition our policies have an important role to play in encouraging healthy, active lifestyles for example by promoting access to open spaces, and leisure and recreational facilities within any schemes. The *NPPF* recognises that accessible, high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.

9.6   The Castle Point and Rochford Clinical Commissioning Group (CCG) is responsible for contracting health services within the district to ensure that there is suitable healthcare provision that meets the needs of local communities. The CCG became responsible for this function from 1 April 2015. Although it is important to ensure that needs within local communities are met in terms of local healthcare infrastructure, such as GP provision, there is also a need to ensure that wider healthcare facilities such as hospitals are adequately equipped to deal with changes in the population's needs in the wider south east Essex area – across Rochford District, Castle Point Borough and Southend Borough. This needs to be addressed within the new Local Plan to ensure that there is appropriate provision over the plan period.

What are the identified issues?

9.7   Healthcare provision in the past has been largely ad-hoc and there has not been the clear direction that Local Planning Authorities need in order to effectively plan for such facilities. However with recent changes to the organisation of healthcare there is an opportunity to improve the planning of healthcare facilities across the district in a comprehensive and co-ordinated way. As part of the Duty to Co-operate we have been involved with the Castle Point and Rochford CCG, Southend CCG, Southend University Hospital NHS Foundation Trust and South Essex Partnership University NHS Foundation Trust to support the preparation of a longer term strategy for the delivery of healthcare facilities.

9.8   Ensuring that there is adequate healthcare provision in the district, both now and in the future, was raised as an issue during the early community engagement programme in 2016. There is concern about access to local GP services, in particular the ability to be seen within a reasonable time period, as well as the response of the emergency services and the ability of the hospitals to cope with increasing numbers of patients and emergencies. Improvements to healthcare infrastructure can be fed into our Infrastructure Delivery Plan and will link to the strategies and business planning of the CCG.

9.9   We need to ensure that future healthcare provision meets the needs of all our communities, particularly our older population which is projected to increase over the next 20 years as detailed in the *South Essex SHMA*. Supporting older people to have

a healthy and active lifestyle can have a positive impact on local healthcare needs. This is an initiative which is supported by our *Ageing Population Strategy 2017-2017*.

9.10 Concerns around air pollution were also raised during our early community engagement programme in 2016 in certain areas across the district; air quality is considered in more detail in the 'Protecting and Enhancing our Environment' chapter.

What are the realistic options?

9.11 There are four options that have been identified to promote the health and well-being of our local communities**.**

Option	Justification
A. Retain the current policy on healthcare provision	Our current policy in the *Core Strategy* policy CLT4 is considered to be appropriate in setting out the broad approach to support future healthcare provision and to work with relevant partners to ensure effective planning for new facilities. The policy could have a minor update to reflect the role of the Castle Point and Rochford CCG. For smaller sites this relies on calculations from the CCG on potential impact of schemes.
B. Ensure that land is specifically allocated for healthcare	There is a need to ensure that land set aside for healthcare is specifically allocated for the use, so that this is reflected in the value of the land which would have a positive impact on viability.
C. Do not have a policy on meeting healthcare needs	This approach would not enable us as the local planning authority to work effectively with the CCG to ensure that there is adequate healthcare provision in the future to meet the needs of local communities. In addition it would not meet the requirements of the Duty to Co-operate or the provisions within the *NPPF*. This is therefore not an appropriate option.
D. Build on the existing healthcare policy to address wider health and well-being issues	As a Local Planning Authority, we need to consider the wider public health impact of our planning policies. Public health crosses a number of policy areas including promoting sustainable travel, reducing congestion, improving air quality, delivering high quality homes, and accessible open space. A wider policy will assist in supporting and bringing together the key elements which can impact on the health and well-being of local communities.

Community Facilities

> **Tell Me More SP4.2: How do we continue to safeguard existing community facilities and support the delivery of new facilities in the future?**

Where are we now?

9.12 There are a range of community facilities throughout the district, which includes local shops, meeting places, libraries, sports venues, cultural buildings, public houses and places of worship. These facilities tend to be well used and provide an important role for communities. Through our current approach in the *Core Strategy* (policy CLT6) we seek to safeguard the use of community facilities, and ensure that they continue to provide a useful function to the communities they serve, wherever possible.

9.13 National policy supports the retention and development of community facilities, particularly in more rural areas, in the interests of sustainability. We are required to plan positively for these facilities. Our *Core Strategy* recognises that there is a need for additional community facilities within the district which will continue to increase, and that such facilities can act as a focal point for new or existing communities, helping to strengthen identity and sense of community. Policy CLT6 seeks to safeguard community facilities from development, and promote new facilities where a need is shown.

What are the identified issues?

9.14 Such facilities can create a strong sense of community, however some facilities can become under threat or pressure to be developed for other uses, for example local shops and public houses. These facilities are largely dependent on private enterprise to ensure their viability and continued use as such to benefit the local community. This is particularly important in more rural areas where community facilities are more scarce. However, permitted development rights exist which enables certain facilities to change to other uses without the need to apply for planning permission.

What are the realistic options?

9.15 Three options have been identified for community facilities.

Option	Justification
A. Retain the existing policy	This approach would continue to seek to support community facilities as set out in *Core Strategy* policy CLT6.
B. Strengthen the provisions with the existing policy	Community facilities can be registered as Assets of Community Value however case law has indicated that this may not necessarily prevent a community facility from being changed to an alternative use. It may therefore be appropriate to include a provision to resist the conversion of community facilities to residential, as this could undermine the sustainability and vibrancy of a community.
C. Do not have a policy on	We are required to take a positive approach to community

Option	Justification
community facilities	facilities. To not have a policy would be contrary to the *NPPF*.

Education and Skills

Tell Us More SP4.3: How do we facilitate the delivery of education improvements and skills development to support our residents and local economy over the next 20 years?

Where are we now?

9.16   As a district we have a well-educated and skilled workforce, with over a quarter of our workforce holding an NVQ level 4 equivalent or higher (degree level and above)[39]. Just over 80% of those that are of working age are in employment; with the remaining consisting of students, those on temporary / long term sick or looking after the home / family, for example. We also have a lower percentage of people leaving education without any qualifications compared to regional and national averages. There are four secondary schools within Hockley, Rayleigh and Rochford and numerous primary schools throughout our towns and villages.

An educated workforce

9.17   As of 2016, there are 6,541 pupils registered in Primary and Nursery Education in the district, an increase of 3.1% since 2011 (6,344 pupils). In the same year, there were 5,859 pupils registered in secondary education in the district (including 691 at school-based sixth forms), an increase of 2.1% since 2011 (5,786 pupils). Ensuring that there is sufficient capacity within schools in the district to meet the future needs of residents is clearly of paramount importance.

9.18   As part of this, Essex County Council forecasts the potential excess or shortage of places in our primary and secondary schools on an annual basis. We have worked closely with them to deliver improvements in to provision up to 2025. In their role as commissioner for school places in Essex, Essex County Council also produce key reports including the *Developers Guide to Contributions,* the *10 Year Plan* and *Commissioning School Places in Essex.* These reports set out the projected future capacities of schools, the projected number of pupils seeking education at these schools, and how development is expected to contribute to improving school provision in each area. Working alongside Essex County Council, we will need to ensure that any scheme supports improvements in school place provision to cater for the future educational needs of the district's residents, whether this is through expansion of existing schools or through the provision of new schools.

9.19   Our current policies in the *Core Strategy* (policy CLT2 and CLT3) supports this approach through requiring land to be set aside for new schools, enabling the expansion of existing schools and accumulating funds for future use. These have been supplemented by relevant policies within the *Allocations Plan.* Essex County

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[39] www.nomisweb.co.uk

Council is the local authority responsible for advising us on education needs in the district. We have worked closely with Essex County Council under the Duty to Co-operate to ensure that sufficient education provision – both primary and secondary – is provided to support new homes being delivered under our current plans to 2025. This includes new primary schools to the west of Rayleigh and Rochford, as well as land set aside for the expansion of King Edmund School in Rochford. Contributions will continue to be sought for the expansion of the other secondary schools, and primary schools on a site by site basis as required. We also need to make provision for early years and childcare facilities. Widening the choice in education and taking a positive, proactive and collaborative approach to meeting future need is supported by national policy.

A Skilled Workforce

9.20 We have strong links with London which means that we need to accept that a certain level of out-commuting will always be important given our close proximity to the city, as well as other key employment destinations in the county. The strength of our economy, however, can be demonstrated by the fact that, of all businesses registered in the district, 41% have existed for more than 10 years and a further 30% for between four and nine years. There are approximately 29,000 jobs in the district, which gives a job density of 0.56, and means there are only 0.56 jobs available to each person of working age living in the district. This highlights the need to provide more jobs within the district to meet the needs of our residents and also to act as a counter to the high levels of out-commuting.

9.21 The largest sectors for employment in the district include the construction, retail, professional, scientific and technical sectors. We also have a relatively high proportion of enterprises in the IT, digital and creative sector. However there is a mismatch between the level of skills and qualifications of our residents required for available local employment opportunities. A skills training academy is supported in the *Core Strategy* particularly in relation to the high-value aviation-related sector.

9.22 We are committed to developing a continual supply of a skilled young workforce and promoting apprenticeship opportunities, particularly higher apprenticeships to school leavers. Therefore, from 2017, a 3 year programme of Career Taster Days has been developed with the district's secondary schools, which focuses on promoting the career opportunities available in the South Essex skill shortage areas and in particular within our district. Access to skills, training and education – whether secondary, higher or further – can improve the health and well-being of communities through providing greater choice to access employment opportunities.

9.23 Students are now required to stay in some form of education or training until the age of 18. In the district, 1.8% to 2% of those between the ages of 16 and 18 were not in employment, education or training (NEETs), from September 2016 to January 2017, according to the Essex Employability and Skills Unit. This equates to between 34 and 38 individuals. There are no colleges or universities in the district but each of our secondary schools has its own sixth form, and there is a wide choice of colleges and universities in neighbouring areas, including South East Essex College and University of Essex.

What are the identified issues?

9.24 The relationship between Essex County Council as the education authority and schools has changed in recent years. Within the district all four of our secondary schools now hold academy status, which means they are self-governing and in control of their own budgets and staffing. Essex County Council still has an advisory role, but even if a need is identified for a school to expand, Essex County Council cannot insist on it. There is therefore a need to work closely with schools in the district to ensure that adequate provision is delivered to meet the needs of local communities in the future.

9.25 There is concern within local communities about the capacity of secondary schools to meet needs in the future; particularly within the outlying villages of Hullbridge, Canewdon and Great Wakering where pupils are bussed to their nearest secondary school, as identified through the early community engagement programme in 2016. In Canewdon for example there was a recognised need to sustain the local school; it was also highlighted that there is a need for more childcare facilities in the village. Appropriate education and childcare provision is therefore important to local communities and needs to be appropriately addressed through plan-making. The Essex County Council-produced report, *Commissioning School Places in Essex,* forms a useful tool as it sets out the current and projected pupil numbers at each school, enabling us to identify any specific issues relating to under-supply or over-demand of schools in a particular area.

9.26 As a general guide around 800 new homes would generate a need for a new primary school and around 3,000 new homes would generate a need for a four form entry secondary school, with up to 6,000 new homes generating a need for an eight form entry secondary school. However this need is dependent on other factors including the current capacity of existing schools, as well as the location of any new homes in proximity to one another to generate a need. There are also complex flows both across the district and between neighbouring local authorities – primarily Southend and Castle Point Boroughs – which need to be taken into consideration. We will therefore need to work with Essex County Council and Southend Borough Council under the Duty to Co-operate, and with other relevant authorities, on cross-boundary issues such as education.

9.27 There is a skills gap in the district of necessary skills for specific careers, which impacts on the ability of local people to access certain local jobs. *Core Strategy* policy ED1 supports the development of a skills training academy to bridge this recognised gap, however deliverability is likely to be an issue. We need to intervene early to inform students of their choices, and work in partnership with skills training providers to continue to nurture them into successful career paths. Working with students is a key opportunity to educate students of the skills gap and those skills that are in demand which is a key role, performed by our economic development officers. We will continue to be an active partner of the Castle Point and Rochford Employment, Skills and Business Group. One of the fundamental aims of this group is to work with local stakeholders to promote skills and education. We also need to invest in up-skilling our workforce through promoting apprenticeships, especially higher apprenticeships and working with local businesses wherever possible to support these through the plan-making process. We have explored this issue further in the emerging *Rochford District Economic Growth Strategy 2017*.

9.28 The *Economic Development Needs Topic Paper 2017* notes that across Essex skills and education are a concern, as there is an increasing need for higher level skills and qualifications as growth continues in professional and senior occupations. There is a mismatch between the level of skills and qualifications of our residents required for available local employment opportunities, which means that there is a need to invest in up-skilling our working age population – as well as those progressing through our local secondary schools. The closure of the Adult Community Learning Centre in Rochford supports the need for the development of a skills training academy, as identified in the *Core Strategy*. This may not be feasible given the increase in further and higher education provision in neighbouring authorities within South Essex. Other initiatives may need to be considered to support up-skilling in the district.

What are the realistic options?

9.29 There are five options that have been identified to plan for education and skills development in the future.

Option	Justification
A. Retain the current policies on schools provision	The detail of current policies in the *Core Strategy* – specifically policies CLT2 and CLT3 – are considered to be appropriate in setting out the broad approach to facilitating the delivery of new schools, school expansion and financial contributions to deliver improvements. However, some elements of the policies may need updating to reflect planned delivery and future need.
B. Ensure that land is specifically allocated for schools	There is a need to ensure that land set aside for education is specifically allocated for the use, so that this is reflected in the value of the land which would have a positive impact on viability.
C. Do not have a policy on meeting education needs	This approach would not enable us as the local planning authority to work effectively with Essex County Council and local schools to ensure that there is adequate school provision in the future to meet the needs of local communities. In addition it would not meet the requirements of the Duty to Co-operate or the provisions within the *NPPF*. This is therefore not an appropriate option.
D. Update the current employment growth policy on skills and continue to support skills development through a skills training academy	Our current policy (*Core Strategy* policy ED1) supports the development of a skills training academy to enhance the skills base within the district and match local skills with locally available employment opportunities. There is a mismatch coupled with a shortage of specific skills within our district. Whilst the delivery of a skills training academy is still an aspiration, deliverability may be an issue. In the interim, up-skilling of our workforce is important and through promoting apprenticeships and working with local

Option	Justification
	businesses this could be supported through the plan-making process and working with local colleges to address identified skills gaps arising in the future.
E. Promote apprenticeships through planning	Similar to proposals within neighbouring authorities, we could consider conditioning approved applications for new, extension to or the replacement of employment provisions to require businesses to work with us and our partners to offer apprenticeships and further education training to residents.

Early Years and Childcare Provision

Tell Us More SP4.4: How do we facilitate the delivery of early years and childcare facilities to support our residents and local economy over the next 20 years?

Where are we now?

9.30 Essex County Council is responsible for meeting certain statutory responsibilities relating to the provision of early years and childcare services within the district. This includes supporting early years and childcare providers with information, advice, guidance and training, as well as funding early years and childcare providers to meet certain agreed objectives. The *Essex Early Years and Childcare Strategy 2015-2018*[40] sets out Essex County Council's strategic objectives and priorities relating to early years and childcare services across Essex.

9.31 The provision of early years and childcare facilities is a key service which supports parents wishing to re-enter employment, continue with their current employment or to pursue further or higher education. Both the *Core Strategy* and *Allocations Plan* identify where additional early years and childcare facilities are required – which is supplemented by up-to-date information at the planning application stage. *Core Strategy* policy CLT2 sets out the broad requirements for the provision of early years and childcare facilities that are required to accompany the delivery of new homes. Essex County Council monitors the demand and supply for these facilities across Essex to give an overview of the additional early years and childcare facilities that would be needed as a result of population growth within an area.

9.32 The figures below in Table 110 have been provided by Essex County Council as of August 2016 and identify the point at which a development site would trigger early years and childcare provision. Those wards which are red suggest that not much development would be needed in the area to trigger a need for early years and childcare provision. This this a snap shot which does not take into account new homes planned as part of our current policies in the *Core Strategy* and *Allocations Plan*, but it does identify where there is likely to be a shortfall in provision in the future.

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[40] dnn.essex.gov.uk/Portals/49/Documents/Home/About%20us/DS15_4960_EY_20_03_17_sp-EY_Strategy_2017.pdf

Table 1<u>10</u>: Triggers for early years and childcare provision (source: Essex County Council)

Ward Name [41]	Provision Type	Amount of EYCC funded places available	Early Years provision needed	RAG rating
Ashingdon and Canewdon	There are currently 5 providers: Childminder 1 Pre-School 4	There are currently 6 (2 year old funded) places available, and 12 (3-4 year old funded) places available	There would need to be at least 18 funded places being generated for Early Years provision to be considered.	
Barling and Sutton	There are currently 4 providers: After-School Club 1 Breakfast Club 1 Day Nursery 1 Holiday Club 1	There are currently 7 (2 year old funded) places available, and 10 (3-4 year old funded) places available	There would need to be at least 17 funded places being generated for Early Years provision to be considered.	
Downhall and Rawreth	There are currently 5 providers: Childminder 2 Day Nursery 2 Pre-School 1	There are currently 3 (2 year old funded) places available, and 3 (3-4 year old funded) places available	There would need to be at least 6 funded places being generated for Early Years provision to be considered.	
Foulness and Great Wakering	There are currently 6 providers: Childminder 5 Pre-School 1	There are currently 2 (2 year old funded) places available, and 2 (3-4 year old funded) places available	There would need to be at least 4 funded places being generated for Early Years provision to be considered.	
Grange	There are currently 9 providers: Childminder 5 After-School Club 1 Breakfast club 1 Day Nursery 1	There are currently 0 (2 year old funded) places available, and 10 (3-4 year old funded) places available	Due to the insufficient amount of 2 year old funded vacancies. We would look to add additional Early Years and childcare provision within this ward.	

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[41] Note that Ward Boundaries in the district changed in 2015

Ward Name [41]	Provision Type	Amount of EYCC funded places available	Early Years provision needed	RAG rating
	Primary School Nursery 1			■
Hawkwell North	There are currently 4 providers: Childminder 3 Pre-School 1	There are currently 4 (2 year old funded) places available, and 4 (3-4 year old funded) places available	There would need to be at least 8 funded places being generated for Early Years provision to be considered.	■
Hawkwell South	There are currently 3 providers: Childminder 2 Pre-School 1	There are currently 1 (2 year old funded) places available, and 1 (3-4 year old funded) places available	There would need to be at least 2 funded places being generated for Early Years provision to be considered.	■
Hawkwell West	There is currently 3 providers: Childminder 2 Day Nursery 1	There are currently 0 (2 year old funded) places available, and 0 (3-4 year old funded) places available	Due to the insufficient amount of 2 and 3-4 year old funded vacancies. We would look to add additional Early Years and childcare provision within this ward.	■
Hockley Central	There are currently 11 providers: Childminder 7 Day Nursery 2 Pre-School 2	There are currently 23 (2 year old funded) places available, and 25 (3-4 year old funded) places available	There would need to be at least 48 funded places being generated for Early Years provision to be considered.	■
Hockley West	There are currently 2 providers: Childminder 1 Holiday Club 1	There are currently 0 (2 year old funded) places available, and 0 (3-4 year old funded) places available	Due to the insufficient amount of 2 and 3-4 year old funded vacancies. We would look to add additional Early Years and childcare provision within this ward.	■
Hullbridge	There are currently 3 providers: Childminder 2	There are currently 1 (2 year old funded) places available, and	There would need to be at least 3 funded places	■

Ward Name [41]	Provision Type	Amount of EYCC funded places available	Early Years provision needed	RAG rating
	Pre-school 1	2 (3-4 year old funded) places available	being generated for Early Years provision to be considered.	red
Lodge	There are currently 6 providers: Childminder 5 Pre-school 1	There are currently 0 (2 year old funded) places available, and 0 (3-4 year old funded) places available	Due to the insufficient amount of 2 and 3-4 year old funded vacancies. We would look to add additional Early Years and childcare provision within this ward.	red
Rayleigh Central	There are currently 2 providers: Childminder 2	There are currently 0 (2 year old funded) places available, and 0 (3-4 year old funded) places available	Due to the insufficient amount of 2 and 3-4 year old funded vacancies. We would look to add additional Early Years and childcare provision within this ward.	red
Rochford	There are currently 10 providers: Childminder 4 Pre-school 1 Day Nursery 4 Primary School Nursery 1	There are currently 20 (2 year old funded) places available, and 40 (3-4 year old funded)places available	There would need to be at least 60 funded places being generated for Early Years provision to be considered.	green
Sweyne Park	There are currently 12 providers: Childminder 11 Pre-school 1	There are currently 0 (2 year old funded) places available, and 0 (3-4 year old funded) places available	Due to the insufficient amount of 2 and 3-4 year old funded vacancies. We would look to add additional Early Years and childcare provision within this ward.	red
Trinity	There are currently 4 providers: Childminder 2 Pre-school 2	There are currently 1 (2 year old funded) places available, and 1 (3-4 year old funded) places available	There would need to be at least 2 funded places being generated for Early Years provision to be	red

Ward Name [41]	Provision Type	Amount of EYCC funded places available	Early Years provision needed	RAG rating
			considered.	
Wheatley	There are currently 7 providers: Childminder 5 Pre-school 2	There are currently 0 (2 year old funded) places available, and 1 (3-4 year old funded) places available	Due to the insufficient amount of 2 year old funded vacancies. We would look to add additional Early Years and childcare provision within this ward.	
Whitehouse	There are currently 3 providers: Day Nursery 2 Pre-school 1	There are currently 5 (2 year old funded) places available, and 4 (3-4 year old funded) places available	There would need to be at least 9 funded places being generated for Early Years provision to be considered.	

What are the identified issues?

9.33 Essex County Council's Early Years and Childcare service are beginning to develop new facilities in the hotspot areas where there is likely to be a shortfall, and are beginning to put forward proposals for Childrens Centres that have closed to offer additional childcare. However the Early Years and Childcare sufficiency data still demonstrates a shortfall of places in specific wards.

9.34 The information in Table 110 can assist with plan-making, however it should be recognised that since September 2017, the Government has been implementing the extended funding entitlement offer for 3-4 year olds. The additional 15 hours of free childcare is available alongside the current 15 hours universal offer for families. These additional hours are for families where both parents are working (or the sole parent is working in a lone-parent family), and each parent earns the equivalent of 16 hours a week at the national minimum or living wage, and earns less than £100,000 a year. This could significantly affect the data shown in Table 110 with a further shortfall of places.

9.35 Since April 2017 Virgin Care, in partnership with Barnardos, has been delivering the Child and Family Wellbeing Service (Pre-Birth- 19 and PB-25 for SEND) throughout the whole of Essex. As part of this process every district now has a dedicated family hub – in our district, the hub will be the Oak Tree in Rayleigh – as well as multiple family hub delivery sites. The centres will also undertake outreach services into local libraries and community areas where there is felt a need for additional services to be provided.

What are the realistic options?

9.36 Three options have been identified for the provision of early years and childcare facilities.

Option	Justification
A. Retain the current policies on schools, early years and childcare	The detail of current policies in the *Core Strategy* – specifically policies CLT2 and CLT3 – are considered to be appropriate in setting out the broad approach to facilitating the delivery of new schools, early years and childcare facilities, school expansion and financial contributions to deliver improvements. However, some elements of the policies may need updating to reflect planned delivery and future need.
B. Ensure that land is specifically allocated for schools, early years and childcare	There is a need to ensure that land set aside for education is specifically allocated for the use, so that this is reflected in the value of the land which would have a positive impact on viability.
C. Do not have a policy on early years and childcare facilities	This approach would not enable us as the local planning authority to work effectively with Essex County Council and local schools to ensure that there is adequate school provision in the future to meet the needs of local communities. In addition it would not meet the requirements of the Duty to Co-operate or the provisions within the *NPPF*. This is therefore not an appropriate option.

Open Space and Outdoor Sports and Recreation

> **Tell Me More SP4.3: How do plan to meet the needs for open space, sports and recreational facilities across the district over the next 20 years?**

Where are we now?

9.37 National policy recognises that access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. There are many open spaces across the district, which are available and accessible for both formal and informal leisure uses. This can include parks, public gardens, playing fields and allotments. These areas contribute to the character of the district's settlements, and form important green networks, as well as providing opportunities for sport and recreation.

9.38 Our current policy in the *Core Strategy* (policy CLT5) requires any schemes to incorporate suitable open space to support future needs of local communities. It also seeks to protect existing open spaces. The calculations for providing new open space as part of any schemes are detailed within our *Open Spaces Study 2009. Core*

Strategy policy CLT10 sets out our broad approach to the provision of playing pitches in particular. There are specific calculations for providing areas for formal sports pitches, which are set out within our *Playing Pitch Strategy 2012.*

9.39 Our *Allocations Plan* policy OSL1 allocates areas of land in the district which are existing open space, as defined in our *Open Spaces Study*, and policy OSL2 specifically identifies those schemes which would require open space provision in accordance with our local standards. Our *Development Management Plan* also provides further guidance on the suitability of locating playing pitches for formal sports (football, rugby, cricket and hockey) across the district within policy DM16. Depending on their size and scale these are considered to be appropriate in certain circumstances taking into account the impact on the Green Belt.

9.40 Open space is an important resource for local communities, with many areas providing a multi-functional use; for example walking and cycling, informal play and formal sports such as football and cricket. Ensuring high quality, accessible open spaces is important given the increasing pressure on land for other uses. We are required by national policy to base our open space policies on up-to-date evidence to assess the quantity and quality of existing provision, and identify potential future needs for different open spaces. We are in the process of updating our sports, recreation and open space evidence through a joint working approach with other authorities in South Essex.

What are the identified issues?

9.41 Our current evidence on the demand for playing pitches is in need of updating to inform the planning of future provision. We are working with neighbouring authorities in South Essex to prepare more strategic level evidence of needs across the sub-region for sports and recreation. There is a similar issue relating to our evidence on open space requirements in the district. However, we will work with our neighbouring authorities to update our evidence in line with national policy, and to identify ways to improve connectivity between green spaces through the provision of 'green' corridors. This would have a positive impact on biodiversity in the district. Biodiversity and green infrastructure are considered in more detail in the 'Protecting and Enhancing our Environment' chapter.

What are the realistic options?

9.42 There are four options that have been identified for open space, outdoor sports and recreation.

Option	Justification
A. Retain, and where necessary update, the existing overarching policy on open spaces	*Core Strategy* policy CLT5 provides our broad approach to the protection of existing, and requirements for new, public open space across the district. It is considered to be fit for purpose but would benefit from updating where necessary.
B. Retain, and where necessary update, our current policy on existing	*Allocations Plan* policy OSL1 allocates all of the areas which are currently identified and are in use. This may need to be updated for example if new open spaces are identified through a strategic review of our *Open Spaces*

Option	Justification
open space	*Study 2009* and *Playing Pitch Strategy 2012*.
C. Retain, and where necessary update, our current policy on new open space	*Allocations Plan* policy OSL2 identifies the strategic locations where it is expected that new open space would be provided as part of schemes. This may need to be updated as the new Local Plan progress, and taking into consideration a strategic review of our *Open Spaces Study 2009* and *Playing Pitch Strategy 2012*.
D. Retain, and where necessary update, our current policies	*Core Strategy* policy CLT10 sets out the broad approach to the provision of playing pitches. *Development Management Plan* policy DM16 provides detailed criteria for locating playing pitches. This policy is considered to be fit for purpose but would benefit from minor updates in relation to landscape character, following a review of our evidence, where necessary.

Indoor Sports and Leisure Centres

Tell Me More SP4.4: How do we plan the provision of indoor sports and leisure centres in the future?

Where are we now?

9.43 Sport and leisure activities have an important role to play in improving the health, well-being and quality of life of residents, and supporting the local economy. The importance of having good quality, accessible leisure facilities is reinforced in the *NPPF* (particularly paragraphs 70 and 73). The district contains a number of both private and public sports and leisure facilities, including those on school premises. The two main leisure centres are Clements Hall in Hawkwell and Rayleigh Leisure Centre to the west of Rayleigh, but their offer is complemented by a variety of other private facilities across the district, and potentially elsewhere in neighbouring areas.

9.44 The *Core Strategy* recognises that there are a number of potential leisure opportunities, such as within school premises, which are currently not available to all. If these facilities were opened up fully they have the potential to increase accessibility to leisure activities for residents. Accessibility of leisure and recreation facilities is an important issue and future leisure developments should be in locations accessible by a range of transport options – such as walking, cycling and public transport.

9.45 The *Retail and Leisure Study 2014* found that residents of the district have relatively good access to a range of leisure facilities, including facilities in neighbouring areas. However, the study also found that the proximity of major leisure facilities in neighbouring districts may limit the potential for any major commercial leisure facilities in the district. The study also found there to be an adequate supply of gyms and health clubs within the district to meet local needs for the foreseeable future.

9.46 Paragraph 74 of the *NPPF* seeks to protect existing built facilities for sport and leisure use, unless there is evidence to show they are surplus to requirements, they would be

replaced by an equivalent or better facilities, or other sports needs outweigh the loss. *Core Strategy* Policy CLT9 sets out our broad policy for indoor sports and leisure facilities across the district. It seeks to maintain and enhance facilities and encourage school premises to make their facilities accessible to all. Furthermore, Clements Hall Leisure Centre in Hawkwell and Rayleigh Leisure Centre are specifically allocated as leisure facilities in the *Allocations Plan* (Policy OSL3), in order to preserve their use. Great Wakering Leisure Centre was not allocated as at the time it had closed.

9.47 An assessment of built leisure facilities will be undertaken alongside the review of playing pitches for the wider South Essex area to strategically assess the need for these facilities across the sub-region.

What are the identified issues?

9.48 Whilst the *Retail and Leisure Study 2014* found that residents of the district have relatively good access to a range of leisure facilities, including those in neighbouring districts, there is local disparity between the diversity and quality of these facilities. At present, whilst some residents may reside close to a leisure facility, they may still have to travel a significant distance to access a specific type of leisure facility, e.g. a swimming pool. As part of our early community engagement programme in 2016, specific concerns were raised about the lack of swimming facilities in Rayleigh and the lack of operational leisure facilities in Great Wakering.

9.49 The *Core Strategy* identifies that many schools within the district contain or operate leisure facilities, but that these are not always accessible to residents. If these facilities were made accessible to residents, this may help to expand and diversify the offer of leisure facilities across the district.

What are the realistic options?

9.50 There are two options that have been identified to address the provision of indoor sports and leisure centres.

Option	Justification
A. Retain the existing policy	This approach would continue to seek to deliver the ambitions of *Core Strategy* policy CLT9 to preserve and enhance existing facilities, and to make the best use of other underutilised facilities by encouraging those, such as within school premises, to be made accessible to all.
B. Do not have a policy on indoor sports and leisure centres	To not have a policy would weaken our ability to preserve and enhance our indoor sports and leisure facilities, and would be inconsistent with national policy which seeks to protect existing built facilities for sport and leisure use.

3.135

Facilities for Young People

> **Tell Me More SP4.5: How do we enable the delivery of more facilities that are suitable and accessible for young people in the future?**

Where are we now?

9.51 Youth facilities provide a useful service to young people in the district, providing them with places to meet with their peers and participate in recreational activities.

9.52 The *Core Strategy* identified a lack of accessible, appropriate, informal meeting places for young people in the district, made complex by the varying needs of facilities for younger and older teenagers. As a consequence, policy CLT8 seeks to encourage the provision of additional facilities for young people within appropriate locations where a need has been identified and which are accessible by a range of transport options. Such facilities will need to be well managed, flexible to changing needs and ultimately be appropriate to the target age-group.

9.53 Appendix H1 of the *Core Strategy* identifies specific opportunities to increase the provision of activities for young people in the central area of Hockley, and on the majority of strategic sites identified in policies H2 and H3. More detailed on the specific thresholds for youth facilities for these sites is provided within the *Allocations Plan*. These requirements are based on the findings of the *Open Space Study 2009.*

9.54 Paragraph 70 of the *NPPF* requires planning authorities to plan positively for the provision and use of community facilities, such as meeting places, which would include youth facilities. Furthermore, the *NPPF* requires us to guard against the unnecessary loss of valued facilities and services.

What are the identified issues?

9.55 Formal places where people can meet and interact with their peers have traditionally fallen into two categories: spaces for children (e.g. playgrounds); and spaces for adults (e.g. pubs). Both of these spaces tend not to be accepting of young people. These reasons have meant that existing meeting places are insufficient and unsuitable for the needs of young people, and mean there is an unmet demand for additional youth facilities. The need for more facilities for young people in Great Wakering and Rochford was raised by residents during the early community engagement programme in 2016.

What are the realistic options?

9.56 Two options have been identified to address the provision of youth facilities.

Option	Justification
A. Retain the existing policy	*Core Strategy* policy CLT8 identifies the requirement to provide age appropriate youth facilities where need is identified, in an accessible location. This covers all the aspects needed for such a policy.
B. Do not have a policy on youth facilities	Having no specific policy on youth facilities weakens our ability to provide additional facilities for young people in the district.

Play Space Facilities

> **Tell Me More SP4.6: How do we facilitate the delivery of appropriately located and accessible play space for our communities in the future?**

Where are we now?

9.57 In order to reduce the amount of greenfield (undeveloped) land needed to deliver new homes, it has become increasingly difficult to ensure that homes have large garden areas that can be used as play space. Therefore the need to provide communal play space is becoming even more vital within new housing schemes. Play spaces are a valuable community asset which provide a recreation facility for children, and can help foster a sense of community through providing a space where neighbours can interact.

9.58 Policy CLT7 of the *Core Strategy* requires new developments to incorporate appropriate communal play space in compliance with the Council's *Open Space Study 2009.* This strategy sets out our approach to the delivery of communal play space. It is crucial these are conformed with in order to successfully deliver desirable, safe play space. Appendix H1 of the *Core Strategy* identifies specific opportunities to increase the provision of play spaces within the majority of strategic sites identified in policies H2 and H3. More detailed on the specific thresholds for play space for these sites is provided within the *Allocations Plan*. These requirements are based on the findings of the *Open Space Study 2009*.

What are the identified issues?

9.59 Play spaces are a valuable community asset which provide recreation facilities for younger people. Whilst the district is home to a significant number of play spaces, accessibility and quality is somewhat uneven across the district. It is therefore of importance to ensure that existing play spaces are preserved and enhanced, where appropriate, and that new play spaces are provided, where justified, which offer a safe environment to those using them. Through the early community engagement programme in 2016 it was suggested that there is a need for more play areas in Rochford in particular.

9.60 Some of our older play spaces are poorly located, and have not been planned as an integral part of a housing scheme. This can mean that there are issues with natural / passive surveillance, access, security and quality. There is an ongoing need to secure funding for the maintenance of play areas, to ensure that their quality is upheld and

effective safe working practices can be carried out to ensure play spaces remain safe for all.

What are the realistic options?

9.61 There are two options that have been identified to address the provision of play spaces.

Option	Justification
A. Retain the existing policy	*Core Strategy* policy CLT7 is reasonable in its requirements to incorporate communal play space within new housing schemes. Associated charges, maintenance and protection of play spaces are also considered to be addressed by the policy, comprehensively covering all aspects of delivering and maintaining adequate safe play space.
B. Do not have a policy on play space	This is not seen as an appropriate option. Accessibility to play space is vital to the quality of life of local residents and is proven to improve health amongst the population, as well as fostering a sense of community. As such, play space comprises a crucial role in the make up of new residential schemes.

10   Protecting and Enhancing our Environment

> **Strategic Priority 5: Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape**

Introduction

10.1 National policy is clear that planning has a role to play in minimising vulnerability and providing resilience to the impacts of climate change, including flood risk, coastal change, water supply and changes to biodiversity and landscape. Development in areas potentially vulnerable to climate change should be avoided, and where it cannot be avoided, development should be suitability adaptable to deal with any changes (*NPPF* paragraph 99).

10.2 Our district is rich in heritage, geology and biodiversity with many miles of undeveloped coastline. The River Crouch forms the north boundary of the district, with the North Sea providing the eastern boundary, and the River Roach flowing east to west through the district. Our coast and estuaries are of great importance and are recognised through their international and national designations for their wildlife and natural habitats. The impact of development on the natural environment, and in particular the character of different areas, was a common issue raised through the early community engagement we undertook in 2016. Local areas of ecological value – such as Local Nature Reserves and Local Wildlife Sites – are also of importance and make a significant contribution to the character of our district.

10.3 The different landscapes across the district, which have been shaped by the underlying geology, are of significance and are valued, along the rivers and coastline as well as further inland towards the more undulating landscape towards the west of our district. Most of the district is Green Belt, which is important for protecting the open, predominantly rural, character of the area. The history of our district and the preservation of the historic fabric of our urban and more rural areas are also valued and is distinctive. This is reflected in the plethora of Conservation Areas, Listed Buildings, Scheduled Ancient Monuments and locally distinctive buildings spread across the district.

10.4 Improving the quality of the environment for residents and visitors is important, with key issues such as air quality, light pollution and flood risk, needing to be addressed.

Green Belt

> **Tell Us More SP5.1 – How do we balance protection of the district's Green Belt that the meets the five Green Belt purposes, against the need to deliver new homes and jobs across the district, and the wider South Essex area?**

Where are we now?

10.5 Our Green Belt forms part of the Metropolitan Green Belt, which extends eastwards across South Essex from London. The Metropolitan Green Belt is effectively a planning designation that is given to land, which can include both greenfield (undeveloped) and brownfield (previously developed) land in areas with potentially varying landscape quality. Most of our open countryside – 12,763 hectares – is

designated as Metropolitan Green Belt; the only exception to this is Foulness Island, which is Ministry of Defence land. The Green Belt provides opportunities for people to access the countryside, to keep land for agriculture, forestry and similar land uses, and for nature conservation. Our *Environmental Capacity Study 2015* notes that there are agricultural activities across large areas of the district, predominantly to the north, east and south-east. The quality of our agricultural land needs to be carefully considered.

10.6   A fundamental principle of the Green Belt is to keep a sense of openness between built up areas. The *NPPF* and *PPG* are clear that development in the Green Belt should only happen in exceptional circumstances. Subsequent publications released by the Government reiterate the importance of a plan-led system to maintain and, where necessary, review the existing Green Belt boundary to deliver sustainable development.

10.7   The five purposes of the Green Belt are set out in the *NPPF:*

- to check the unrestricted sprawl of large built-up areas;

- to prevent neighbouring towns merging into one another;

- to assist in safeguarding the countryside from encroachment;

- to preserve the setting and special character of historic towns; and

- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

10.8   However, whilst policies on development in the Green Belt are generally restrictive, there are exceptions to this, for example the construction of new buildings in the Green Belt is generally considered to be inappropriate development, depending on the use. The *NPPF* also supports certain beneficial uses in the Green Belt including outdoor sport and recreation, improvements to biodiversity, visual amenity and landscapes, access and improvements to damaged and derelict land. Further guidance on this is provided within the *PPG*. Our *Environmental Capacity Study 2015* recognises that Green Belt is a planning tool, rather than an environmental resource as such, however as this designation focuses on protecting open space and through consideration of landscape character and sensitivity, it is an issue affecting the condition of the receiving environment.

10.9   Our approach to the Green Belt is broadly set out in the *Core Strategy,* which seeks to balance the wider protection of the openness and character of the Green Belt whilst meeting our development needs, as sensitively as possible, up to 2025. This approach takes into account of the very limited opportunities – when our adopted local development plan was being prepared – to accommodate further development within existing settlements. *Core Strategy* policy GB1 adopts a restrictive approach to development in the Green Belt through allocating the minimum amount of Green Belt to meet development needs, whilst protecting the overall purposes of the Green Belt. Certain types of other development can take place in the Green Belt, and are considered compatible, as set out in the *NPPF. Core Strategy* policy GB2 sets out the types of rural diversification and recreational uses that may be considered appropriate

in the Green Belt. Policy GB2 and more detailed policies in the *Development Management Plan* are considered in detail in the 'Detailed Policy Issues' chapter.

10.10 Previous community involvement exercises have made it clear to us that residents consider the protection of the Green Belt to be very important – as does national policy and guidance. This is a view which has been reiterated through the more recent community engagement programme in 2016; particularly in relation to retaining the open, rural character of the area and preventing towns and villages merging into one another. As a Local Planning Authority, we value the Green Belt and recognise its importance; our current adopted strategy to deliver new homes and jobs has ensured that in the region of 99% of the district's Green Belt remains as such. The extent of the Green Belt is identified in the *Allocations Plan.*

10.11 Although there is a general presumption against development in the Green Belt, national policy and guidance is clear that we must explore all reasonable options for meeting our need for homes and jobs in the future. These options are set out in the 'Delivering Homes and Jobs' chapter. There is also continued support through community engagement for the redevelopment of brownfield sites within existing residential areas. We have prepared a revised *Strategic Housing and Employment Land Availability Assessment* (*SHELAA*) – in line with the *NPPF* and *PPG* – to consider in detail the potential available brownfield land within existing residential areas. We will now consider undertaking an assessment of the Green Belt against the five purposes defined above, in line with national policy and guidance.

What are the identified issues?

10.12 Nationally there is a commitment to increasing the number of new homes delivered to address the issues of a greater requirement for a mix of different types and tenures of homes to meet the changing needs of our population, coupled with an historic undersupply. We are required – taking into account all the policies in the *NPPF* – to 'objectively assess' what our housing need is for the district and for the wider South Essex Housing Market Area. We are also required to assess our need for new jobs in the future. These issues are considered further in the 'Delivering Homes and Jobs' chapter. However the majority of South Essex, outside the existing residential areas, is designated as Green Belt. We need to consider this objectively assessed housing and employment need, within the wider context of the *NPPF* and *PPG*, and the Government's commitment to protect the Green Belt.

10.13 Our current policies seek to prioritise the development of brownfield (previously developed) land, wherever possible, whilst enabling some development on greenfield land, previously designated as Green Belt. However, national policy is such that development of new homes and commercial property on brownfield land in the Green Belt can take place. This however could mean that development takes place in the Green Belt, regardless of whether we assess the Green Belt boundaries provided it meets the relevant policies in the *NPPF.*

10.14 Our current position in terms of housing need is complicated by the proposals within the *Housing White Paper;* Fixing Our Broken Housing Market (February 2017), and the Government's subsequent consultation document, called Planning for the Right

Homes in the Right Places[42] (September 2017), which seeks to establish a national methodology for assessing housing need. This is further complicated by an appeal decision within Castle Point Borough, recovered by the Secretary of State. The Secretary of State refused planning permission for new homes in the borough on 21 April 2017 against the advice of a Planning Inspector for the development of a Green Belt site, despite the Inspector finding that the Council only had 0.4 years worth of housing land supply. This is coupled with the withdrawal of Castle Point Borough Council's draft New Local Plan on 4 April 2017, following its failure to meet the legal requirements of the Duty to Co-operate in relation to meeting the need for new homes and the Green Belt. Another Planning Inspector examining St Albans City and District Council's draft plan also concluded that Local Planning Authorities need to leave "no stone unturned" in meeting the need for new homes and jobs. This is considered further in the *Duty to Co-operate Topic Paper 2017*.

10.15   The *Environmental Capacity Study 2015* considers in detail a range of factors and draws some conclusions and recommendations on the environmental capacity of the district to accommodate additional new homes beyond 2025. It highlights that it is uncertain as to whether the district could accommodate additional growth, and is unlikely to be able to accommodate additional needs from other areas. The study however recommends site-specific studies could be undertaken for small sites around the northern and western urban areas, and that this could include an assessment of the Green Belt. The need for new homes in the district is considered in more detail in the 'Delivering Homes and Jobs' chapter.

What are the realistic options?

10.16   Three options in relation to the Green Belt have been identified.

Option	Justification
A. Retain the existing policy on broad Green Belt principles in the *Core Strategy*	The broad policy on Green Belt – policy GB1 in the *Core Strategy* – is considered to be appropriate in seeking to direct development away from the Green Belt as far as possible.
B. Amend the current Green Belt policy in the *Core Strategy*	The policy may need to be updated to reflect our strategy for delivering new homes and jobs over the next 20 years. In particular, this is likely to be influenced by the new national methodology for assessing the need for new homes. An assessment of the Green Belt as a whole would also need to be taken into consideration.
C. Do not have a policy on the Green Belt	This is not considered an appropriate position – there is a need to protect the Green Belt wherever possible.

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[42] www.gov.uk/government/consultations/planning-for-the-right-homes-in-the-right-places-consultation-proposals

Biodiversity, Geology and Green Infrastructure

> **Tell Us More SP5.2 – How should we protect, manage and enhance our important habitats, nature conservation areas, geology and greenways?**

Where are we now?

10.17 Due to its coastal location the district is particularly important for biodiversity. There are a number of international and national nature conservation designations which reflect this importance:

- Foulness and the Crouch and Roach Estuaries Ramsar sites – these are wetlands designated for their international importance under the Ramsar Convention

- Foulness and the Crouch and Roach Estuaries Special Protection Areas (SPAs) – these are habitats that are important for migratory birds under the European Birds Directive

- Essex Estuaries Special Area of Conservation (SAC) – these are internationally important for threatened habitats and species which are designated under the Habitats Directive

- Foulness, Crouch and Roach estuaries, and Hockley Woods Sites of Special Scientific Interest (SSSI) – these sites, which are designated under the Wildlife and Countryside Act 1981, cover 12,986 hectares and are the country's very best wildlife and geological sites

10.18 There are many other nature conservation designations in our district that are important including 14 Ancient Woodlands, seven of which lie within the Upper Roach Valley with Hockley Woods being the largest, four Local Nature Reserves at Hockley Woods, Hullbridge Foreshore, Marylands and Magnolia Fields, and a further 400 hectares of land that have been allocated as Local Wildlife Sites. A major intertidal engineering project being delivered by the RSPB at Wallasea Island in the north east of the district on the river Crouch is also becoming a significant haven for migratory birds, and other wildlife[43].

10.19 River corridors and green open spaces across the district make a significant contribution to our green and blue infrastructure network. Green and blue infrastructure is a term used to describe networks of natural features that provide benefits to people. These features can range from trees along roads to woodlands and from ponds to rivers. As well as contributing to the character of the district, these areas provide additional habitats for our wildlife, and access for local communities to can have positive impact on mental health, social cohesion and physical activity. The *NPPF* is clear that green infrastructure can increase adaptability to climate change and should be supported. The *Green Grid Strategy 2005* identifies a number of potential greenways which could be developed across our boundaries and into the neighbouring areas of Castle Point and Southend Boroughs to improve habitat

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[43] Wallasea Island Wild Coast Project: www.rspb.org.uk/reserves-and-events/find-a-reserve/reserves-a-z/reserves-by-name/w/wallaseaisland/

connectivity and deliver alternative sustainable ways to travel. This is reflected in *Core Strategy* policy T7. This document however is in need of updating – this will be considered at the South Essex level to take a strategic approach to green infrastructure provision. The *Environmental Capacity Study 2015* recognises that key green infrastructure can be found in the Upper Roach Valley in particular, including dedicated bridleways, Ancient Woodland and marked walking routes.

10.20 We have a number of current policies in our adopted local development plan, which seek to protect and enhance our natural landscapes and important habitats. *Core Strategy* policy ENV1 sets our broad commitment to maintaining, restoring and enhancing our sites of nature conservation importance and the implementation of the *Crouch and Roach Estuary Management Plan.* The *Environmental Capacity Study 2015* notes that there is a risk of non-compliance with the Water Framework Directive for ecological quality along parts of the Rivers Crouch and Roach however.

10.21 Our varying landscapes are partly shaped by the underlying geology of the district. Brickearth is found in shallow seams in south east Essex with significant deposits found throughout our district as identified in the *Essex Minerals Local Plan 2014*. Although these are not currently worked, they could be capable of economic use in the small-scale manufacture of bricks, roof tiles and clay materials, and should be safeguarded. Essex County Council is the minerals and waste local planning authority responsible for planning for the effective use of available minerals and has identified a number of Minerals Safeguarding Areas, which apply to the development of one or more new homes. Minerals deposits, such as brickearth across the district, are safeguarded from sterilisation under policy S8 of the *Essex Minerals Local Plan 2014*. There is also one of three Strategic Aggregate Recycling sites in Essex, located at Purdey's Industrial Estate in Rochford, which is well placed to serve south-east Essex, and is safeguarded under policy S5 of the *Essex Minerals Local Plan 2014*). One of seven coated stone plants in Essex, located at Suttons Wharf in Rochford, is also safeguarded under policy S9 of the *Essex Minerals Local Plan 2014*.

10.22 National policy broadly seeks to prevent the loss or deterioration of irreplaceable habitats, including Ancient Woodland and the loss of aged or veteran trees found outside Ancient Woodland. It also recommends the use of criteria based policies to assess schemes which may impact on protected wildlife sites. Policy DM25 of our *Development Management Plan* provides more local detail on how applications which may impact on trees and woodlands would be treated; with the aim of conserving and enhancing existing trees and/or woodlands wherever possible. It also supports the creation of new woodland. Our *Development Management Plan* has other policies on the natural environment, including policy DM26 which relates to the protection of important landscape features (such as hedgerows, lakes and ponds), and policy DM27 which relates to the protection of priority species and habitats. The *Environmental Capacity Study 2015* also recommends investigating the scope for enhanced local food production and security, including restoration of the traditional orchards and revival of local market gardens and allotments. A mix of different types of open space is an approach which has been promoted through our adopted local development plan; in particular the provision of public open space and allotments.

10.23 A number of our woodlands are currently designated as Local Wildlife Sites in the *Allocations Plan* (policy ELA1). These are the minimum habitats needed to be protected in order to maintain current wildlife levels across the county. They can also

function as corridors for wildlife through providing key connections between other habitats. We have identified 39 such sites in the *Local Wildlife Sites Review* prepared in 2007; however this is in the process of being updated to ensure that our evidence on current biodiversity levels, threats and management arrangements is both up-to-date and effective.

What are the identified issues?

10.24 The potential impact of climate change on the adaptability from small to larger scale habitats is a concern. This, coupled with the fragmentation of habitats, can have a negative impact on the biodiversity and wildlife. Ensuring that appropriate networks are available throughout the district is important to help local populations adapt to any change in the local climate. A landscape scale approach can help to build resilience in wildlife responding to climate change, development and other potential pressures.

10.25 National policy requires us to plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure, and make connections between the hierarchy of international, national and locally designated sites. This is to ensure that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks. We therefore need to work with neighbouring local authorities to identify local wildlife corridors and networks across boundaries, to show the links between the different hierarchies of international, national and locally designated sites of importance for biodiversity.

10.26 Given this district's coastal location there are many habitats designated as Special Protection Areas (SPA's), Special Areas of Conservation (SACs) and Ramsar sites, which create a network of important habitats along the Essex coast. Natural England have identified the need to develop a joint Essex-wide strategy to identify how the potential impacts of recreational disturbance resulting from the delivery of new homes in the county (not just the coastal authorities) may be mitigated against. This is to address concerns that Natural England have identified within the Habitat Regulations Assessments (HRAs) prepared to support emerging Local Plans. HRAs are a legal requirement for formal stages of plan-making. We are therefore working with Natural England and other authorities to prepare an Essex Coastal Recreational Avoidance and Mitigation Strategy to ensure compliance with HRA Regulations.

What are the realistic options?

10.27 Two options have been identified in relation to biodiversity and geodiversity in the district.

Option	Justification
A. Retain or amend our current broad policy on sites of nature conservation importance	*Core Strategy* policy ENV1 sets out our commitment to maintaining, restoring and enhancing our sites of nature conservation importance. It could however be strengthened to identify and seek to enhance local wildlife corridors and networks which support the adaptability of wildlife to any change in climate. Reference could also be made to the geology of the district as per the *Minerals Local Plan 2014.*
B. Do not have a policy on	The broad approach set out in *Core Strategy* policy ENV1

Option	Justification
sites of nature conservation importance	is considered to be appropriate in in setting out our commitment to sites of nature conservation importance, and supports more detailed policies on protecting specific habitats.

10.28 Five options have been identified to support and protect local habitats which have important ecological value.

Option	Justification
C. Retain our current policy on trees and woodlands	*Development Management Plan* Policy DM25 on trees and woodland is considered to be fit for purpose in terms of requiring appropriate mitigation for any loss of habitats, their retention and enhancement and the creation of new habitats. This approach is supported by national policy.
D. Retain our current policy on other important landscape features	*Development Management Plan* Policy DM26 sets out our approach to protecting other important landscape features that have been identified. This policy is considered to be fit for purpose and this approach is supported by national policy.
E. Retain our current policy on species and habitat protection	*Development Management Plan* Policy DM27 sets out our approach to protecting priority habitats and species. This policy is considered to be fit for purpose and this approach is supported by national policy.
F. Update our current policy on Local Wildlife Sites	*Allocations Plan* Policy ELA1 will need to be updated to reflect the findings of the latest Local Wildlife Sites assessment; and allocate these sites accordingly.
G. Condense and merge our current policies on nature conservation	Whilst our current policies are considered to be appropriate; there is potential to strengthen our broad, strategic policy and supplement this with more succinct detailed policies.

10.29 Two options have been identified in relation to greenways in the district.

Option	Justification
H. Retain our current policy on greenways	*Core Strategy* Policy T7 sets out our approach to greenways, which are important walking and cycling corridors which promote biodiversity and connectivity of habitats. No strategic greenways have been developed in the district to date, however we are committed to reviewing the appropriateness of these greenways, set out in the *Green Grid Strategy* and promoting their delivery.
I. Do not have a policy on greenways	Ensuring the connectivity of habitats as a response to climate change pressures, and facilitating a network of green open spaces and greenways to promote health and well-being, are national policy considerations. To not have a policy on greenways would not be an appropriate approach.

Wallasea Island and the RSPB's Wild Coast Project

> **Tell Us More SP5.3 – How do we continue to support the RSPB's development of the Wallasea Island as an important nature conservation project and visitor destination in the future?**

Where are we now?

10.30 Work to create an RSPB nature reserve on Wallasea Island is well underway with development of the reserve expected to continue until around 2025[44]. This RSPB project is progressing to create wildlife habitats consisting of mudflats, saltmarsh, lagoons, grazing marsh and pasture. Policy URV2 in the *Core Strategy* supports the development of this project in the district, including promoting recreational use, additional marina facilities and access improvements. There is significant potential for the area to become a tourism and leisure destination, in addition to the wider ecological benefits of the project. There are two walking routes that have been delivered on Wallasea Island; Allfleets Marsh Trail which runs from the temporary car park for 3km along the length of seawall on the River Crouch; and the Jubilee Marsh Trail which runs south from the Allfleets Marsh Trail for 2.4km to reach the River Roach.

10.31 Current policy supports the delivery of the nature reserve, including the development of recreational facilities and the development of Essex Marina which is located before the entrance to the reserve, provided that any potential adverse ecological impacts are avoided or mitigated against. There are limited facilities on site (as of October 2017) including a 24 space car park, visitor's information board and a number of bird hides. The RSPB predict that the number of visitors in 2016/2017 is in the region of 22,000; so there is a need to support and monitor this site in conjunction with the RSPB. Improving access to this facility has the potential to positively impact on the health and well-being of local communities.

What are the identified issues?

10.32 As Wallasea Island is located in the north eastern extent of the district, the current opportunities are rather constrained by its relatively remote location, and inaccessibility. Access is therefore a key issue to overcome, although there is potential to improve sustainable access to this location over the long term.

10.33 The designation of the area as Green Belt may be challenging for the provision of facilities on the island, although these are needed to support this area as a destination in the longer term. However, provided these facilities would not have a detrimental impact on the Green Belt – particularly in terms of openness – this issue could be overcome.

What are the realistic options?

10.34 There are three realistic options that have been identified for Wallasea Island and the RSPB's Wild Coast Project:

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[44] Wallasea Island Wild Coast Project: www.rspb.org.uk/reserves-and-events/find-a-reserve/reserves-a-z/reserves-by-name/w/wallaseaisland/

Option	Justification
A. Retain the current policy which supports the Wallasea Island Wild Coast Project	This policy in the *Core Strategy* supports the RSPB's project, including promoting recreational use, additional marina facilities and access improvements. It would also support the development of sustainable access such as cycle routes to the Island to connect homes, jobs and this key leisure destination.
B. Continue to support further development at Essex Marina as per current policy	Essex Marina is identified, alongside Baltic Wharf, as a major developed site in the Green Belt in the *Core Strategy* and *Allocations Plan*. This area may be able to support further development, provided that any adverse ecological impacts are avoided or mitigated, as set out in the *Core Strategy.*
C. Do not support further development at Essex Marina	Essex Marina, alongside Baltic Wharf, provides rural employment opportunities in the district. Although Essex Marina by its nature requires a coastal location, any detrimental impact on the environment should be avoided or mitigated. Applications should be considered on a case-by-case basis.

Landscape Character

> **Tell Us More SP5.4 – How should we address local landscape character?**

Where are we now?

10.35 The district has a varied nature in terms of local landscape character. The vast majority of our Green Belt remains open and undeveloped and, as a district, we continue to perform the role of the green part of South Essex. The *Essex Landscape Character Assessment 2003* identifies at a high-level the changing landscape across the county. There are three broad landscape characters that have been identified across the district;

- Crouch and Roach Farmland – extends south from the River Crouch then skirts around Hockley, Rochford and Rayleigh, to the east of Rochford as far south as Great Wakering

- Dengie and Foulness Coast – covers the far eastern extent of the district, meeting the eastern boundary of Great Wakering

- South Essex Coastal Towns – encompasses Hockley, Rochford and Rayleigh and the area in between, and Great Wakering

10.36 The *Essex Landscape Character Assessment 2003* also recognises that traditional landscape characters – such as the Upper Roach Valley and the Crouch Valley – survive well and need particular protection from landscape or development change. A

specific assessment was undertaken in 2005 for the coastline; the *Landscape Character Assessment of the Essex Coast*. This assessment identified a number of landscape character areas along our coastline including: Crouch Estuary and Foulness, Rochford mixed farmlands, River Roach, Canewdon sloping claylands, and River Crouch. These areas broadly align with the Coastal Protection Belt. The Essex Wildlife Trust have identified the Upper Roach Valley, the Crouch and Roach estuaries, areas to the east of Rochford and Foulness Island as 'living landscapes'[45], which will need to be considered further as part of a local level landscape character assessment for the district.

10.37   National policy supports the protection of valued landscapes and requires us to implement criteria based policies to assess any schemes which may impact on landscape areas. It requires us to maintain the character of the undeveloped coast and to protect and enhance its distinctive landscapes, whilst improving public access to and enjoyment of the coast. We are required to plan for biodiversity at a landscape-scale across local authority boundaries.

10.38   The *Environmental Capacity Study 2015* notes that there is an evident east to west divide across the district in terms of landscape, with mostly low lying land with marsh and sandy flatlands to the east of the district creating far-reaching views. The undeveloped coast is one of the most important landscape assets of our district; an area which is recognised for its wildlife and natural importance through the national and international nature conservation designations. We are encouraged by national policy to protect such areas but to also improve access. *Core Strategy* Policy ENV2 on the Coastal Protection Belt seeks to direct development away from the undeveloped coastline wherever possible. This includes preventing the potential for coastal flooding and not permitting development in areas at risk of flooding, erosion or land instability. The extent of the Coastal Protection Belt is allocated within policy ELA2 of the *Allocations Plan*. A *Marine Management Plan* is also being prepared by the Marine Management Organisation – the marine area beyond the district will be covered by the *South East Marine Plan*[46]. Until this is adopted, the *UK Marine Policy Statement*[47] should be referred to.

10.39   The Upper Roach Valley is located between the towns of Rayleigh, Hockley and Rochford, and includes Hockley Woods – which is Ancient Woodland – and Cherry Orchard Jubilee Country Park. This is an area with special landscape characteristics. The role of the Upper Roach Valley as a large 'green lung' has been further reinforced providing a substantial informal, accessible area for recreation, with green links criss-crossing the valley and connecting Rochford with Rayleigh and linking the Cherry Orchard Jubilee Country Park in the south with Hockley Woods in the north. This area is known for its landscape, as well as biodiversity, importance. *Core Strategy* Policy URV1 seeks to protect this area from development which would undermine it as a vast 'green lung', but provide recreational opportunities for local residents. It supports the expansion of the Country Park, and the creation of links with other parts of the Upper Roach Valley, effectively creating a single, vast informal recreational area. This broad

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[45] www.essexwt.org.uk/living-landscapes
[46] www.gov.uk/government/collections/south-east-marine-plan
[47] www.gov.uk/government/uploads/system/uploads/attachment_data/file/69322/pb3654-marine-policy-statement-110316.pdf

policy is supported by policy ELA3 of the *Allocations Plan* which identifies its boundary.

10.40 National policy also recommends that landscape character assessments are prepared, and integrated with an assessment of historic landscape character. These assessments should consider the sensitivity of the landscape. Taking a landscape scale approach can help to build resilience in wildlife. A *Historic Environment Characterisation Project* was undertaken in 2006 which considers the rich history of the area, the historic natural landscape and the potential for significant archaeological deposits across the district, and their sensitivity to change. A further district-level landscape character assessment; taking account of the *Historic Environment Characterisation Project* will be prepared in due course to inform the next stage of plan-making to provide a greater understanding of the value and importance of landscapes across the district. The *Environmental Capacity Study 2015* also recognises that there is good quality (grade 1-3) agricultural land through most of the district with high quality (grade 1-2) in the central area. There are also large areas of safeguarded mineral (brickearth) deposits in the central area of the district. The study recommends a further distinction between grade 3a and 3b to identify any possibilities for small scale housing development in the western area of the district.

What are the identified issues?

10.41 Any proposed schemes need to take into account the different landscape characters across the district with the aim of protecting and enhancing the diversity and local distinctiveness of the countryside. However some landscapes are more sensitive to development than others, and any schemes need to be carefully considered within this local context. We therefore need to prepare more detailed evidence on local landscape characters within the context of the wider landscape character areas identified through the *Essex Landscape Character Assessment.* The *Environmental Capacity Study 2015* considers landscape character, historic environment and key recreational areas together to determine potential sensitivity; unsurprisingly the areas comprising the Upper Roach Valley and Dengie and Foulness Coast are considered to have a higher sensitivity compared to the other two areas.

10.42 There is potentially some policy conflict between the direction of policies in our *Development Management Plan* (such as policy DM10) – which supports schemes within the South Essex Towns Landscape Character Area, which is predominantly covered by our Upper Roach Valley Special Landscape Area, and Hockley Woods which is Ancient Woodland. It was clear from the early community engagement programme in 2016 that residents value the open, rural nature of the area. This further reinforces the need to have more detailed evidence on local landscape characters.

10.43 From an agricultural land quality perspective, the district can be divided into three different areas, as set out in the *Environmental Capacity Study 2015*, with varying sensitivity to change. The land to the east of the district has medium to high sensitivity due to the quality of the land and soils, and their importance to wildlife; whereas as you move further to the west of the district towards the central area the sensitivity is medium due to the soil types and minerals deposits. The west of the district has the lowest sensitivity as it contains our three towns with lower quality agricultural land.

What are the realistic options?

10.44 Five options have been identified for landscape character.

Option	Justification
A. Retain the current policies on the Upper Roach Valley	Our *Core Strategy* (policy URV1 and ELA3) are considered to be appropriate and in line with national policy, however the extent of the Upper Roach Valley may be reviewed as part of a local level landscape character assessment.
B. Retain the current policies on the Coastal Protection Belt	Our *Core Strategy* (policy ENV2 and ELA2) are considered to be appropriate and in line with national policy. However the extent of the Coastal Protection Belt will reviewed as part of a local level landscape character assessment.
C. Develop a broad policy on landscape character	This policy would consider the varied landscapes across the district, and identify any particular sensitivities.
D. Ensure consistency throughout *Development Management Plan* policies in relation to supporting development in appropriate landscape character areas and special landscapes.	A more detailed assessment of landscapes within the district should help to resolve any potential issues of conflict within existing policies.
E. Do not have a policy on landscape character	The *NPPF* supports the protection of distinctive and valued landscapes, including the undeveloped coast. It would therefore not be appropriate to fail to have a policy addressing landscape character.

Protecting and Enhancing Heritage and Culture

Tell Us More SP5.5 – How do we continue to protect and enhance our heritage and culture in the future?

Where are we now?

10.45 There is a strong sense of heritage and culture within the district, ranging from the natural environment, with miles of unspoilt coastline, to the historic Conservation Areas in many of our town and village centres. The district is predominantly rural and is rich in natural heritage, consisting of miles of internationally and nationally protected stretches of our coastline, 14 ancient woodlands, five scheduled ancient monuments and many nature reserves. The heritage of our district – both the natural and built environment – was highlighted as important through the early community engagement programme in 2016.

10.46 There are over 330 Listed Buildings across the district, with concentrations in our towns and villages. *Area Action Plans* have been adopted for the town centres of Hockley, Rayleigh and Rochford, with the latter two encompassing their Conservation

Areas highlighting the importance of their historical identity. These plans are centred upon increasing the attractiveness of the centres to shoppers and visitors, partially through regeneration to preserve and enhance the character and heritage of the area.

10.47 In order to preserve the character of the district high quality design is an essential practise. Through the implementation of *Core Strategy* policy CP1 we seek to promote good design which takes into account to the local setting following guidance from our *Housing and Design Supplementary Planning Document,* the Essex Design Guide and Urban Place Supplement. Any schemes within our 10 Conservation Areas are subject to *Core Strategy* policy CP2, requiring that the actions recommended in the adopted *Conservation Area Appraisal and Management Plans* are implemented in order to protect these areas against inappropriate development. Essex County Council's *Essex Design Guide* is also referred to inform heritage-led developments within sensitive areas. This document is currently being updated.

10.48 Some buildings carry historic value providing a sense of identity and place in addition to being the physical evidence of our cultural heritage. These buildings are listed, applying a statutory protection to them, resulting in proposed building works, both internal and external, requiring an additional level of approval to be sought. Some buildings, despite not being listed, are of local distinctiveness and form part of a familiar and cherished local scene. These buildings form part of the *Local List Supplementary Planning Document* and, although not statutory, through implementing *Core Strategy* policy CP3, we encourage land owners to be sympathetic, avoiding demolition or any alterations which would diminish the architectural, historic or townscape value of these locally important buildings.

10.49 *Development Management Plan* policy DM7 provides further guidance on the treatment of locally listed building through the planning application process. Policies DM8 and DM9 in this plan relate to demolition within Conservation Areas and development just outside these areas; and further seek to protect the character of the Conservation Areas. Policy DM23 also seeks to specifically manage schemes proposed in Conservation Areas within the Green Belt.

What are the identified issues?

10.50 There is a risk of inappropriate development in Conservation Areas. These areas are afforded statutory protection under the Planning (Listed Buildings and Conservation Areas) Act 1990 for alterations such as extensions, boundary treatments, the demolition of unlisted buildings and works to trees. However, designation of a Conservation Area does not prevent all changes and the area may be subject to pressures (good and bad) that will affect their character and appearance.

10.51 There are numerous Listed Buildings within the district. However there are many buildings which do not merit statutory listing but are important in contributing to the local distinctiveness and form a familiar part of the local streetscene. Those buildings are protected within Conservation Areas, but outside there is no statutory protection. We have prepared a *Local List Supplementary Planning Document* to identity and seek protection of their important assets, including resisting unsympathetic alterations.

What are the realistic options?

10.52 There are two options that have been identified for heritage and culture.

Option	Justification
A. Retain the existing policies	*Core Strategy* policies CP1, CP2 and CP3 are considered to be appropriate and fit for purpose in seeking to maintain high quality design and preserving the local heritage and culture in the district. The supplementary policies in the *Development Management Plan* (policies DM7 DM8, DM9 and DM23) contribute to this purpose through appropriately managing schemes within sensitive areas. The policies within the *Area Action Plans* for Rayleigh and Rochford, in particular, due to their historic significance are also heavily focussed on protecting the character of these town centres. Locally listed buildings, which do not have statutory protection, are afforded some protection through the planning polices by *Core Strategy* policy CP3 and *Development Management Plan* policy DM7.
B. Do not have policy or additional guidance relating to culture and heritage	This is not seen as a feasible option. It is vital to protect the culture and heritage of the district, through maintaining good design practises and preserving historically important areas. The policies seek to maintain the character of the district which is steeped in history, which is important not only for the welfare of local people through preserving a quality environment but also the local economy through tourism opportunities.

Good Design and Building Efficiency

> **Tell Us More SP5.6 – How do we promote good design and building efficiency for new homes and commercial premises in the future?**

Where are we now?

10.53 Good quality design is essential for creating safe, attractive and prosperous places where people want to live, work and visit. It is important that the design of any scheme is of high quality and sensitive to our local areas, through drawing on the existing strengths of our rich natural and built environment to create a sense of place. National policy places great importance on achieving high quality, inclusive design and a good standard of amenity within schemes. Accessibility is also important through the provision of clear pedestrian routes and high quality public spaces.

10.54 The general thrust of national policy is reflected in our current policies on design in the *Core Strategy* and *Development Management Plan.* Policy CP1 sets the broad approach that should be taken to design; to reflect local character and distinctiveness and take cues from the existing historic fabric of the area. It recognises that good design can prevent further erosion of the area's character. Guidance in Supplementary Planning Documents and Village Design Statements are

recommended, and other design guidance such as the *Essex Design Guide* and *Urban Place Supplement* are referred to. It is appreciated that, whilst creating a sense of place, good design can also encourage community cohesion by designing out crime and anti-social behaviour, and reduce inequalities. It is also recognised that other aspirations such as small-scale renewable energy projects could conflict with good design principles, so the location, scale, design in particular needs to be carefully considered. Policy DM1 sets out a criteria-based approach to how good design principles should be applied to any schemes. This is supported by our *Housing and Design Supplementary Planning Document*.

10.55   In terms of efficient building design, our *Core Strategy* includes a policy on the code for sustainable homes (policy ENV9) which was the national single standard on energy efficiency for new homes and involved an environmental assessment method for new homes based on a scoring system of six levels. The Government's aim was for all new homes to be carbon-neutral (code level 6) by 2016. As part of housing standards review by the Government in 2014, however, most of the initiatives within the code for sustainable homes were put into Building Regulations to deliver a more standardised and clear approach to efficiency expectations; which limits efficiency standards to code level 4. However, energy efficiency measures such as limited water, energy, access and space can still be required through planning.

10.56   BREEAM standards for commercial and industrial buildings – which are set out in the *Core Strategy* (policy ENV10) – were not affected by this review and can still be required through planning. BREEAM (Building Research Establishment Environmental Assessment Method) is the most widely used environmental assessment method for buildings. BREEAM covers a wide range of building types such as BREEAM Offices and BREEAM Retail, which are assessed against set criteria. There are four levels of rating for all commercial and industrial buildings to achieve (Pass, Good, Very Good and Excellent). We require a 'Very Good' standard as a minimum unless this would affect the viability of a particular scheme.

What are the identified issues?

10.57   Overall, it is considered that our current policies are broadly sufficient in being able to deal with design issues when assessing any schemes. However, at times it is recognised that good design principles – from an urban design perspective – could create conflict with security. Security principles set out in the national guidance *Secured By Design*[48] are referred to in the *Development Management Plan*, but are not specifically referenced in any design policies.

10.58   The *Essex Design Guide* provides guidance on principles for reflecting local character within the county. There are currently no Village Design Statements that set out design criteria for specific areas, or other area level plans that have established design principles (other than the *Area Action Plans*). Many of the district's towns and villages are however covered by *Conversation Area Appraisals and Management Plans* due to their historic importance.

10.59   The *Housing White Paper* raises concerns that design guidance is not localised enough to ensure that schemes reflect the character and identity of individual areas.

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[48] www.securedbydesign.com/

We have specific design guidance within our *Supplementary Planning Documents* on housing design, design, landscaping and access but the paper recommends detailed guidance within policies – whether they are local or neighbourhood plans. It suggests that design codes or similar be prepared in consultation with local communities, which would mean – it is suggested – that if a scheme complies with a particular code, then design would not be a valid reason to object to the scheme at the planning application stage.

10.60 There are limitations on the efficiency measures that can be required through planning for new homes. It is also challenging to enforce compliance with the remaining efficiency measures which still fall within planning, given the types of measures that would be required for energy efficiency such as shallower baths and more efficient toilet systems.

10.61 We still require commercial and industrial buildings to comply with BREEAM standards. This approach is still considered to be appropriate in the drive for efficiency; however in practice viability has proved to be an issue. Complying with BREEAM may not be appropriate for all building types, for example warehouses, and the BREEAM assessment itself, and even proving that it is not economically viable has been found to have a detrimental affect on the deliverability of schemes.

What are the realistic options?

10.62 Four options have been identified in relation to ensuring design principles are appropriate.

Option	Justification
A. Retain the existing policies on design.	The current design policies are considered to be broadly sufficient in being able to deal with design issues when assessing any schemes. However any changes in national policy or guidance, such as design codes, may need to be considered.
B. Ensure design policies make specific reference to *Secured by Design*, and the need to strike an appropriate balance between urban design and security.	It is important to ensure that any scheme – whilst being appropriately sensitive to the local context – is also suitably secure over the lifetime of the development.
C. Retain current guidance within our *Supplementary Planning Documents.*	Our current guidance provides broad principles that schemes should follow to ensure that they are appropriately designed, which is considered to be fit for purpose. However this could be further expanded to provide more specific design guidance for each area.
D. Develop specific design principles for individual towns and villages building	This would ensure that any new schemes, potentially outside of those covered by the *Area Action Plans* and *Conversation Area Appraisals and Management Plans*,

Option	Justification
on the current guidance within our *Supplementary Planning Documents.*	are suitably designed for each area, in consultation with local communities, which have already agreed a design code or framework for schemes.

10.63 Seven options have been identified for building efficiency standards for new homes, and new commercial and industrial buildings.

Option	Justification
E. Remove reference to the Code for Sustainable Homes and replace with a simpler policy on water efficiency.	*Core Strategy* policy ENV9 has mostly been replaced by changes to Building Regulations. However the *NPPF* promotes sustainable development, and resilience to climate change.
F. Continue to drive up energy efficiency standards for new homes through replacing the Code for Sustainable Homes with one that focuses on energy, thermal and water efficiency in particular.	This option would ensure that all new builds meet minimum standards for energy, thermal and water efficiency which would improve their sustainability and reduce greenhouse gas emissions in line with national policy. However, this may prove to be challenging to enforce.
G. Do not have a policy on energy efficiency standards for new homes.	Promoting sustainable development is a thread running through the *NPPF*. The potential impacts of climate change are also a concern, so improving the sustainability and efficiency of homes is supported by national policy.
H. Retain existing policy on BREEAM.	*Core Strategy* policy ENV10 is considered to be fit-for-purpose in terms of ensuring a high standard of energy efficiency for commercial buildings in accordance with national policy and guidance. However applying it to all types of commercial buildings may not be appropriate.
I. Amend the existing policy on BREEAM to apply to only certain types of buildings.	Given the viability challenges that affect schemes trying to assessment BREEAM; therefore the requirement could just be applied to public buildings as an example of good practice, so that the delivery of private schemes is not hindered.
J. Include a specific policy on the efficiency of conversions, extensions and alterations to	This option would ensure that conversions, extensions and alterations to existing homes meet minimum standards for energy, thermal and water efficiency which would improve their sustainability and reduce greenhouse gas emissions

Option	Justification
existing homes.	in line with national policy.
K. Do not have a policy on energy efficiency standards for conversions, extensions and alterations to existing homes.	Promoting sustainable development is a thread running through the *NPPF*. Potential impacts of climate change are also a concern, so improving the sustainability and efficiency of homes is supported by national policy. This is not considered to be an appropriate option.

Air Quality

Tell Us More SP5.7 – How do we manage air quality issues in the future across the district?

Where are we now?

10.64   Access to clean air is a fundamental requirement when seeking to ensure a high standard of living. Exposure to poor quality air is associated with health risks, environmental damage and pollution.

10.65   Air quality in a particular area can be affected by a number of factors, including emissions from nearby industrial and commercial activities and vehicle movements, as well as the density and scale of buildings through the potential to affect the dispersal of pollutants. Vehicle movements are responsible for the majority of nitrogen dioxide (NO_2) emissions across the country[49]. Growing dependence on cars in the district has increased air pollution in recent decades; however technological improvements and shifts towards more sustainable ways to travel (such as walking, cycling and public transport) may help to counteract this.

10.66   We are required to monitor air quality periodically within our administrative area, in order to monitor and assess air quality against set standards. Where air quality is particularly poor, we need to designate an Air Quality Management Area (AQMA) and propose an action plan to improve air quality in that area. Air quality was identified through the early community engagement programme, which took place in 2016, as an area of concern.

10.67   Paragraph 124 of the *NPPF* states that planning policies should sustain compliance with, and contribute towards, EU thresholds or national objectives for pollutants, taking into account the presence of Air Quality Management Areas (AQMAs) and the cumulative impacts on air quality from individual sites in local areas. *Core Strategy* policy ENV5 states that schemes for new homes will be restricted in any areas designated as AQMAs, in order to reduce public exposure to poor air quality. The policy also states that we will seek appropriate measures to reduce the impact of poor air quality and to address the causes of poor air quality. Our approach to supporting

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[49] Improving air quality in the UK: *Tackling nitrogen dioxide in our towns and cities*: www.gov.uk/government/uploads/system/uploads/attachment_data/file/486636/aq-plan-2015-overview-document.pdf

and encouraging sustainable ways to travel and requiring travel plans (considered in the 'Delivering Infrastructure' chapter) seeks to reduce carbon emissions produced by vehicles wherever possible. *Development Management Plan* policy DM29 specifically requires all major schemes (10 or more homes, or a site area over 0.5 hectares) to undertake air quality assessments, with conditions attached to any approval of permission to offset the impact on local air quality.

10.68 The *Environmental Capacity Study 2015* examines the issue of air quality and notes that a key cause of air quality issues in the district is congestion and emissions from road traffic. It recommends that to mitigate additional vehicle use arising from new homes and businesses, the following measures should be supported: highway improvements, particularly to reduce congestion; provision of better and more efficient public transport; improved walking and cycling routes and improved rail lines and train services. Policies relating to these measures are considered in more detail in the 'Delivering Infrastructure' chapter.

What are the identified issues?

10.69 The district has high sensitivity to changes in air quality, as noted in the *Environmental Capacity Study 2015,* due to the capacity of the road network. We currently have one area designated as an AQMA, Rayleigh High Street. This AQMA area envelops the Rayleigh High Street (A129) from the junction with Sweyne Court to the junction with the A127, at the Rayleigh Weir. This AQMA was declared in February 2015 after monitoring showed marginal exceedances on Government guidelines on Nitrogen Dioxide. The *Rayleigh Town Centre Air Quality Action Plan* (AQAP), due to be adopted in 2017, sets out the Council's strategy for tackling the poor air quality in this AQMA area. The AQAP notes that the Council's adopted local development plan includes policies and measures which will help to reduce poor air quality over the plan period, such as promotion of greener, sustainable transport options and potential improvements to Rayleigh town centre. However, the *AQAP* also suggests further actions which may help to alleviate the poor air quality in the AQMA, of which some actions may fall within the scope of the new Local Plan. Such actions include highway management schemes and alterations, electric vehicle charging points, and enhanced pedestrian and cycling routes.

10.70 The development of new homes in areas with poor air quality, particularly areas designated as an AQMA, may have the potential to exacerbate the air quality situation, and expose a greater number of residents to poor quality air. Where such schemes are proposed, it may be necessary to consider the impact such a proposal would have on the quality of air in the area, and the potential harm to those residents living within the AQMA area. However, our current policy seeks to restrict residential development within AQMAs. The *Environmental Capacity Study 2015* however notes that poorer air quality is likely to the west and south-west of the district and associated with road traffic emissions and the key transport corridors of the A130 and A127, including routes into Southend-on-Sea and to London Southend Airport.

10.71 During our early community engagement programme in 2016, concerns were raised by some residents regarding the quality of air in certain areas of the district, and whether air quality was being monitored in these areas. Whilst the monitoring of air quality is fundamentally dealt with by the Council's Environmental Health team, it may be necessary to consider the impact that proposed developments have on air quality

across the district, and any areas which are declared AQMAs in the future, in order to adequately safeguard residents against exposure to poor air quality.

What are the realistic options?

10.72 There are four options that have been identified in relation to air quality.

Option	Justification
A. Retain the existing policies on air quality	*Core Strategy* policy ENV5 is still considered to be fit for purpose and allows us to restrict schemes for new homes where it would increase exposure to poor air quality or exacerbate existing poor air quality situations. *Development Management Plan* policy DM29 is also still considered to be appropriate in requiring air quality assessments for specific schemes.
B. Continue to promote clean air initiatives, such as sustainable ways to travel and renewable energy projects	Such proposals, where implemented, may help to improve air quality in that location and reduce the risks associated with exposure to poor air quality. Making use of technological innovations can result in positive contributions to managing air quality.
C. Support, where appropriate, the actions put forward in the *Rayleigh Town Centre Air Quality Action Plan*	The *Rayleigh Town Centre Air Quality Action Plan* includes specific proposals to combat poor air quality within the designated Rayleigh High Street AQMA. Where these actions require planning permission, or other planning involvement, supporting the implementation of these actions, provided they are considered appropriate, may help to alleviate the poor air quality situation in this area.
D. Do not have a policy on air quality	Such an approach is not considered to be a realistic option as national policy requires us to consider the impact proposed development has on air quality, and the presence of AQMAs.

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11   Detailed Policy Considerations

As a part of our review of our current local planning policies and emerging evidence, we identified potential issues and opportunities relating to our more non-strategic, detailed policies.

Introduction

11.1   In addition to the strategic priorities and objectives that have been identified in previous chapters, which together support our draft vision, there a number of detailed policy issues that sit behind them. Our current adopted local development plan includes specific, detailed policy requirements which need to be reviewed and updated in line with more recent evidence. This includes the composition of affordable housing products, extensions to homes and businesses in the Green Belt, and signage. Other policy considerations have emerged through national policy and guidance which we need to give consideration to, including how we meet the needs for self-build and custom-build homes, and how we deal with rural exception sites.

Mix of Affordable Homes

Tell Us More D.P1.1: How do we ensure that affordable homes (the split between intermediate and social housing products) meet the needs of our residents over the next 20 years?

Where are we now?

11.2   Our *Core Strategy* requires that 35% of all new homes on sites of 15 or more units, or on sites that are greater than 0.5 hectares, are required to be affordable depending on viability constraints in exceptional circumstances within policy H4. Of these affordable homes 80% should be social housing to provide homes for those on our Housing Waiting List, and 20% intermediate housing products, such as shared ownership. Of the 257 affordable homes delivered, since the *Core Strategy* came into effect in December 2011, 213 have been affordable rented homes for those on our Housing Waiting List, and 43 intermediate (shared ownership) homes for those needing help to purchase their own home, as of October 2017. The wider issue of how we deliver affordable homes is considered in more detail in the 'Delivering Homes and Jobs Chapter'.

What are the identified issues?

11.3   Our current policies have delivered affordable homes to meet local need, particularly for those of our residents who are most in need. However the *Housing White Paper* – which sets out how the affordability of homes could be tackled nationally through changes to the planning system – proposed that the definition of affordable housing be widened. The definition could include starter homes and affordable private rent for example, which would likely reduce the number of properties that are delivered and available for affordable rent. Affordable rented homes are specifically for those households on our Housing Waiting List who are most in need of a home. Until these

proposals have been fully considered, and integrated into national policy and guidance, there remains some uncertainty about the potential implications.

11.4 If the definition of affordable homes changes then we would still need, as the body responsible for local housing matters, to ensure that we seek to meet the needs of our residents as far as we can.

What are the realistic options?

11.5 There are three identified options to address the split between affordable housing products.

Option	Justification
F. Retain the current affordable homes split (80% social and 20% intermediate) where a scheme meets the prescribed threshold	This current policy requirement has delivered 232 affordable homes over the last five years. It particularly provides for those households most in need on our Housing Waiting List.
G. Amend the split taking into account any changes in national planning policy and guidance (if the definition of affordable homes is widened to include other products)	There is some uncertainty about the direction of national policy and guidance in relation to the definition of affordable homes. This may reduce the number of homes available for those on our Housing Waiting List. However, the mix could favour affordable rent, for example 10% starter homes; 70% affordable rent; 15% shared ownership and 5% affordable private rented, depending on the outcome of the *Housing White Paper* and local viability testing.
H. Do not have a prescribed split in a policy	This would increase the flexibility of a policy; and would enable any schemes to meet affordable homes need at the time an application is submitted. However, it would provide less certainty for developers and could mean that there is no guarantee that enough social products are delivered to meet the needs of those on our Housing Waiting List.

Self-Build and Custom-Build Homes

Tell Us More D.P1.2: How do we plan for the demand for self-build and custom-build plots over the next 20 years?

Where are we now?

11.6 Providing more choice for those that wish to build their own homes is a Government initiative which is not currently covered by local policy. There are two types of housing which is supported; self-build and custom-build homes. Self-build housing normally means that a person manages the design and construction of their own home, and may undertake some of the building work as well. Custom-build usually means that a

person will work with a specialist developer who will organise the design and construction to help them deliver their new home to their specifications.

11.7 There are currently no self-build plots in the district or plots of land allocated for this purpose; and there are no existing policies to support their development. We are required to maintain a register of interest from people hoping to build their own home[50], and as of October 2017 we had 44 individuals and organisations on our register. To be included on the register, applicants must confirm that the property – if delivered – would be their sole or main residence[51]. As a home is designed to suit the needs of the individual, on average, residents are more likely to stay in their home for longer. Such homes can prove to be more innovative – in terms of design and construction – and potentially be delivered more quickly than more traditional methods.

What are the identified issues?

11.8 National policy and guidance requires us to support proposals for self-build and custom-build homes where demand is indicated by registrations on our Self Build and Custom Build Register; and where this demand is realistic in terms of the financial capacity of applicants. This presents a challenge for us, as there are a number of pressures to deliver different types of homes to meet different needs across the district; and the requirement for self- and custom-build homes needs to be considered as part of our wider strategy for delivering new homes. However the *NPPF* also states that we should avoid new isolated homes in the countryside unless there are special circumstances (paragraph 55).

11.9 Land outside the existing residential areas is allocated as Green Belt land; of those on our Register, only 14% have their own plots of land that they would like to deliver as a self-build project. Allocating land for individual self-build plots in the Green Belt has the potential to lead to sporadic development in the countryside, contrary to the five purposes of the Green Belt (*NPPF* paragraph 80), and the wider sentiments of the *NPPF* to retain the character of the countryside. Such an approach could create further pressure which could have an erosive impact on the Green Belt. This would need to be carefully considered, potentially on a case-by-case basis.

11.10 For those that do not have access to their own plots of land; identifying suitable land or working with land owners to utilise their land for such a use may prove difficult due to the nature of the construction. The profit margin for the land owner may be reduced when compared to a similar traditional build. Consideration also needs to be given to the locations in the district where there is a demand for such plots.

11.11 There could prove to be issues with adequate funding available to those wishing to begin a self- or custom-build project. Banks are usually less inclined to lend to fund such projects, due to the increased risk. However, this is a factor outside the planning system. Self- or custom-build build homes are also exempt from certain contributions such as the Community Infrastructure Levy (or CIL) that we are looking to develop.

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[50] Rochford District's Self-Build and Custom-Build Register: www.rochford.gov.uk/planning-and-building/planning-policy/self-build-and-custom-build-register
[51] Self-Build and Custom Housebuilding Act 2015; Self-build and Custom Housebuilding (Register) Regulations 2016

This could prove problematic to providing the necessary infrastructure to support such development – and could have a cumulative impact on local services and facilities.

What are the realistic options?

11.12 Four options have been identified for the delivery of self-build and/or custom-build plots.

Option	Justification
A. Require a proportion of self-build and/or custom-build plots to be provided on private market allocated or windfall schemes over a certain size (alongside other types of homes needed) based on the level of local demand. For example, a minimum of one plot per 0.5 hectare to be set aside for these types of homes.	This approach would involve a portion of a private developer's site being reserved for self-builds or custom-builds. There may be implications for private developers in terms of viability, however this would provide greater certainty that a number of self-build or custom-build plots would be made available for purchase, and delivery. The actual threshold for provision of plots could be determined by the level of demand within different locations across the district.
B. Utilise the Council's assets, wherever possible, or acquire land to allocate plots for the purpose of self-build and/or custom-build, and help match people on the register to the plots.	We do not currently own, manage or deliver homes, and there are limited assets and resources available to do this. There is also a financial risk involved which needs to be carefully considered.
C. Allocate individual plots in the Green Belt for self-build, where those on the Register have identified that they own the land, and this will be their sole or main residence.	Whilst this approach can provide plots for those with ready-access to land, it has the potential to lead to sporadic development in the countryside, contrary to the five purposes of the Green Belt. Such an approach could create further pressure which could have an erosive impact on the Green Belt.
D. Do not have a policy on self-build or custom-build plots.	This approach is not considered to be appropriate, as the Government requires us to facilitate the delivery of self-build or custom-build plots.

3.163

Rural Exception Sites

> **Tell Us More D.P1.3: How do we address rural exception sites which aim to provide affordable homes to meet local housing needs in rural Green Belt areas?**

Where are we now?

11.13 The purpose of rural exception sites is to provide affordable homes to meet local housing needs in rural Green Belt areas, as an exception to other local policies. Rural exception homes must be for households with local connections through living in that area, or having family or working there, and must remain part of the affordable stock indefinitely. Rural exception sites are defined in the *NPPF* (Annex 2) as:

"Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. Small numbers of market homes may be allowed at the local authority's discretion, for example where essential to enable the delivery of affordable units without grant funding."

11.14 It is important that we provide the right amount of rural homes, of the right type and in the right places. National policy and guidance is clear that we should be looking at providing affordable homes, subject to viability, potentially as part of a mix with market homes. The development of isolated homes should be avoided, although there are certain exceptions. The *PPG* recognises that providing homes in more rural communities can support the rural economy, and help retain local services and community facilities such as schools and local shops. We do not have a current policy specifically on rural exception sites, but have sought to provide rural homes in some of the district's villages. The *PPG* however recommends that we should avoid blanket policies on restricting the delivery of new homes in some settlements and preventing other settlements from expanding, unless their use can be supported by robust evidence.

What are the identified issues?

11.15 There is no clear definition of what defines 'rural' as this varies from place to place depending on the size and number of settlements within a particular area. The guidance in the *NPPF* suggests that 'small' rural exception sites should be promoted in locations where housing would not normally be allowed.

11.16 Although national policy and guidance supports the identification of rural exception sites, with the publication of the *Housing White Paper* in February 2017 the definition of what constitutes affordable homes could be amended to include a wider range of products, which could impact on the ability of affordable homes to meet the needs of local communities. However, within the current definition in national policy we could utilise our Housing Waiting List to analyse demand for affordable homes within rural areas to identify demand, although the provision of intermediate homes is less straightforward.

11.17 Other challenges to the delivery of homes in more rural areas include the potential for homes to be located in more sensitive environments – although this could drive up design standards; potentially a more limited range of landowners which could restrict the supply of sites; and limited amount of brownfield (previously developed) land which could put pressure on land allocated as Green Belt. Such sites however would need to carefully consider local landscape character and integrate green infrastructure.

11.18 It is recognised that rural exception sites are an important policy tool to deliver affordable homes within smaller settlements across the district, which can help to maintain the sustainability of rural communities. However, in some instances the viability of schemes is increasingly becoming an issue for Registered Providers. We therefore need to consider whether allowing some market homes on rural exception sites – in limited circumstances – would allow for more affordable homes to be provided particularly where this meets a local housing need e.g. to enable local people to downsize. This may affect the price paid for the land but we cannot allow this factor alone to justify more market homes on such sites.

What are the realistic options?

11.19 There are a number of different options that have been identified relating to the approach to delivering rural exception sites in the district.

Option	Justification
A. Introduce a specific policy on rural exception sites to promote the delivery of affordable homes only in rural areas (under 3,000 existing homes), subject to viability	Any schemes within a rural exception site will need to be led by a Registered Provider; the affordable homes would be affordable in perpetuity (however affordability is defined). There could be viability issues on some sites, which would impact on their ability to meet local needs. National policy recommends considering the inclusion of market homes to deliver more affordable.
B. Introduce a specific policy on rural exception sites to promote the delivery of affordable homes in rural areas (under 3,000 existing homes), with an element of market homes to improve overall viability	Any schemes within a rural exception site will need to be led by a Registered Provider, and solely enable the delivery of affordable homes with no element of profit including no additional uplift in land values. Supporting an element of market homes improves viability, and delivers a mix of homes in line with national policy. However it must be made clear that the subsidiary element of market homes is purely enabling development.
C. Include rural exception sites into a wider housing delivery policy, accepting that a limited amount of market homes can be delivered to support a	Any schemes within a rural exception site will need to be led by a Registered Provider, and solely enable the delivery of affordable homes with no element of profit including no additional uplift in land values. This would need to be made explicitly clear within any wider housing delivery policy. Supporting an element of market housing

Option	Justification
greater amount of affordable homes	improves viability, and delivers a mix of homes in line with national policy. However it must be made clear that the subsidiary element of market homes is purely enabling development.
D. The split between the different affordable homes products reflects the overall policy for affordable homes across the district.	This would ensure that there is consistency in the provision of a wide range of affordable homes products that meet the needs of the district's population.
E. A flexible approach to the split between the different affordable homes products so that it is timely and reflects the needs of rural settlements at a time when a scheme is being proposed.	This would ensure that the requirement for different affordable homes products meets the specific needs of a rural settlement when a scheme is being proposed.
F. Any policies on rural exception sites is prescriptive on their size and location to ensure that they reflect the size and function of the nearest rural community	Any schemes will need to reflect the size and function of the rural settlement so that they respect the rural character of an area. Taking a prescriptive approach on the size and location of any rural exception sites would provide certainty for local community.
G. Any policies on rural exception sites is flexible on their size and location to ensure that they reflect the size and function of the nearest rural community	Any schemes will need to reflect the size and function of the rural settlement so that they respect the rural character of an area. Taking a more flexible approach on the size and location of any rural exception sites would enable schemes to be determined on their individual merits as they are proposed. However this could potentially mean ad-hoc schemes being proposed in the Green Belt.
H. Do not have a rural exceptions site policy	The *NPPF* requires us to be responsive to local circumstances and plan to reflect local housing needs, particularly for affordable homes, including through rural exception sites where appropriate.

3.166

Annexes, Outbuildings and Independent Homes

> **Tell Us More D.P1.4: How do we address the development of annexes and outbuildings as independent homes, which sit within the curtilage of existing homes?**

Where are we now?

11.20 In recent years, we have seen a rise in the number of annexes and outbuildings within the curtilage of existing homes being built and then used as separate accommodation, essentially forming an independent home.

11.21 Annexes tend to be attached to the main home, whereas outbuildings form physically separate buildings to the main home. Outbuildings – within the rules set out by Government – are permitted development, provided they are not used as living accommodation. It is recognised that the challenging housing market, and the shortage of new homes across the country, has created housing issues for some in our communities. Such units can give independence to teenagers, young adults, young families or elderly relatives close to the main home. The use of annexes and outbuildings to live in as independent homes has led to a rise in enforcement cases on this issue in the district.

11.22 Although we have a policy on intensification, infilling and backland development in residential areas (*Development Management Plan* policy DM3); we do not have a current policy on the treatment of annexes and outbuildings – specifically in relation to dependence on the main home. However local case law has been established and has set a precedent for the treatment of these types of accommodation.

What are the identified issues?

11.23 The key issue is whether an annex or outbuilding (or similar) are independent from the main home. Case law (ref: 15/00020/FUL) suggests that a dwelling dependent on the main home could have similar facilities to an independent dwelling such as a kitchen, living area and separate rooms, which could be used as a bathroom and a bedroom. To be considered dependent, case law has established that it should have the following features in relation to character and appearance and living conditions:

- Shares the same address as the main home
- Utility services and drainage shared with main home
- Shares external space with the main home
- Does not have a separate access to the main home (access in this case was on foot)

11.24 This case found that the proposal, due to its scale, would not have an impact on *Core Strategy* policies H1 and CP1, or *Development Management Plan* policy DM1 or DM3. The case also found that because of the constrained area that the outbuilding was in and the view that it was reliant on the facilities of the main home for access etc., the fact that internal space standards did not comply with our standards in Development

Management Plan policy DM4 (superseded by the national technical houses standards) was irrelevant.

11.25 The dwelling was permitted on appeal subject to a condition that requiring occupation of the outbuilding to remain ancillary to the main home, with the intention to prevent it from being used as a separate home in the future, as the floorspace, amenity area and access arrangements would not provide adequate living conditions for future occupiers.

11.26 A further consideration – outside the residential area – would be impact on the Green Belt. This would need to be taken into consideration, particularly with regard to protecting the openness of the Green Belt.

What are the realistic options?

11.27 Two options have been identified for annexes, outbuildings and independent homes.

Option	Justification
A. Develop a policy which sets out clear criteria for annexes and outbuildings (or similar)	We could take a positive approach to the treatment of annexes and outbuildings (or similar) where it can be clearly demonstrated that the dwelling would be dependent on the main home. Such dwellings could be conditioned to require their occupation to remain ancillary to the main home. It would also be useful to include guidance on such development in the Green Belt.
B. Do not have a policy on this – continue to reply on case law	Case law has provided clearer guidance on how applications for separate annexes or outbuildings (or similar) should be treated in relation to the threshold for a 'dependence' test on the main home.

Basements

Tell Us More D.P1.5: How do we deal with applications for basements within the existing residential area in the future?

Where are we now?

11.28 The development of a basement can be defined as the construction or extension of one or more storeys of accommodation – associated with the home – below the prevailing ground level of a site or property.

11.29 The construction of buildings with basements, and the construction of basements beneath existing buildings, are becoming increasingly popular nationally[52], particularly

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www.gov.uk/government/uploads/system/uploads/attachment_data/file/564556/161031_Basements_Call_for_Evidence_Final.pdf

in areas with higher land prices or a lack of available space for sideways or 'upwards' development, such as London. The construction of a basement below a building may be desirable for a landowner, because it increases the amount of usable floor space, without encroaching on adjacent land or having an external visual impact.

11.30 The conversion of existing cellars or basements into habitable accommodation is generally considered to not require planning permission, provided it does not form a separate residential unit or require additional external works, such as an external access or light-well. The creation of new basements and the substantial engineering works required to do so would generally require planning permission.

11.31 Policy DM20 of our *Development Management Plan* sets out our approach to the development of basements within the Green Belt. The policy requires that basements do not exceed the footprint of the original dwelling plus the 25% policy allowance for extensions, and that proposed basements do not give rise to a self-contained unit or accommodation, separate from the building to which they relate. The current policy also requires the removal of permitted development rights for further extensions in order to protect against the over-expansion of homes within the Green Belt, and to prevent any potential harm to the openness of the area.

11.32 The construction of a basement would not generally be considered overly intrusive or bulky, nor would basements in the Green Belt generally be considered harmful to openness. However, the provision of a basement may be considered to intensify a particular use; the provision of a residential basement within the Green Belt may, for example, be considered to introduce further undesired residential activity into the Green Belt.

What are the identified issues?

11.33 The provision of a basement may give rise to an undesirable increase in habitable capacity of a particular home, or even the potential for a separate habitable unit otherwise independent of the original 'above-ground' home. Such an increase may cause issues relating to increased activity on the site, and associated planning considerations such as volume of vehicular traffic, parking, amenity space, and compliance with the National Technical Housing Standards. Other concerns about structural stability of nearby buildings can also be raised as an issue.

11.34 In more densely populated areas such as London, issues such as impact on the quality of life, traffic management and the living conditions of nearby residents as a result of the construction of basements (particularly as several in a road could be constructed at one time) are considered to be material planning considerations. Whilst these are important considerations, in our district we have not seen such an increase in applications for basements as London. In the London Boroughs, such as the Royal Borough of Kensington and Chelsea, there are also concerns about the structural stability of adjacent properties, the impact on the character of rear gardens and impact on sustainable drainage – although in some cases it is permitted to extend a basement up to half of the garden area.

11.35 The external visual impact of a basement is generally quite minor, given that the vast majority, if not all, of the basement is unlikely to be readily visible from outside of the associated home. However, the provision of a basement may require other

development such as light-wells, ventilation, external accesses or railings, which have an impact on the character or appearance of a building. Where these are proposed, they could have an impact on visual amenity or the historic environment.

What are the realistic options?

11.36 Two options have been identified relating to the development of basements in the district.

Option	Justification
A. Extend the current policy on basements in the Green Belt	This would limit basements in the residential area to the same extent as those in the Green Belt; including in size and its use as a dependent part of the above ground building. Within the residential area, this policy could also take into consideration the impact on the historic environment (such as Conservation Areas, Listed Buildings and locally listed properties).
B. Do not have a policy on basements in the existing residential area	There has not been a significant increase in the number of applications for basements. The justification for such a policy would need to be clearly evidenced. It is still considered to be appropriate to have a policy on basements in the Green Belt however.

Replacement, Rebuild or Extension of Existing Green Belt Homes

Tell Us More D.P1.6: How do we deal with applications for the replacement, rebuild or extension of existing homes in the Green Belt in the future?

Where are we now?

11.37 For a variety of historical reasons, there are many homes in the Green Belt, and it is entirely reasonable for those living within the Green Belt to be able to extend their homes to meet changing circumstances. However, it is equally reasonable that the scale of such extensions are managed to ensure they do not undermine Green Belt purposes.

11.38 The *NPPF* enables proportionate extensions or alterations of existing homes in the Green Belt over and above the size of the original building, which we take as of 1 July 1948 or, when it was first constructed, if this is later. The replacement of a building is permitted, provided that the new building is in the same use and not materially larger than the one it replaces. Our *Development Management Plan* policies DM17 and DM21 provide more detailed criteria for alterations and extensions; through enabling a 25% increase in the floorspace of the original building. Our policies require schemes to be designed to avoid impact on the character and appearance of the Green Belt through its scale, mass and orientation, as any increase in the volume of a home will inevitably, by its very presence, impact upon the openness of the Green Belt. We also express a preference for low pitched roofs and do not support applications for derelict

or abandoned properties as these are no longer be considered part of the district's housing stock.

What are the identified issues?

11.39 Permitted development rights enable some development to be undertaken without the need to obtain planning permission. These rights have, over more recent years, provided greater flexibility for extensions to homes in the Green Belt, in some circumstances, setting aside the test of what is a 'reasonable' extension for the purposes of the *NPPF*. Therefore the Council considered that the previous 35sq.m of additional habitable floorspace as set out in historic policies no longer related appropriately to the permitted development rights; so we have applied a revised approach of 25%. However in some circumstances permitted development rights are more generous than our policy and this is reflected in the low number of applications for extensions in particular. The Governments permitted development rights have therefore encouraged piecemeal, oversized and disproportionate extensions in the Green Belt, contrary to the *NPPF*, with flat roofs which has had a detrimental impact on the character of the area. In the context of the *NPPF* our current policy to permit a 25% increase is not considered to be disproportionate but it does not encourage submissions of applications for well-designed extensions.

What are the realistic options?

11.40 Three options have been identified to address applications for the rebuild or extension of existing Green Belt homes.

Option	Justification
A. Retain the current policies on replacement, rebuild or extension of existing Green Belt homes	On the whole, our policies in the *Development Management Plan* (DM17 and DM21) are considered to be consistent with the *NPPF*. However there have been a low number of applications, due to the nature of current permitted development rights.
B. Amend the extension allowance within *Development Management Plan* policies DM17 and DM21	Permitted development rights enable generous extensions, contrary to the *NPPF*, which has encouraged numerous disproportionate, piecemeal, flat roofed extensions. Our current policies could be more flexible to encourage applications for well designed, low pitched roof extensions in line with current permitted development rights. This would take a more 'scenario-based' approach to these types of applications.
C. Do not have a policy on extensions and rebuilds	There is a need to provide guidance on what is acceptable in the Green Belt, regardless of the permitted development rights. This approach is not considered to be appropriate.

Agricultural, Forestry and Other Occupational Homes

Tell Us More D.P1.7: How do we deal with applications for agricultural, forestry and other occupational homes in the Green Belt in the future?

Where are we now?

11.41 We take the approach that the provision of new homes in the Green Belt and wider countryside is considered appropriate, where it can be demonstrated that the existence of on-site accommodation is crucial to the success of an agricultural or forestry business. The *NPPF* also allows the construction of new buildings for the purposes of agriculture and forestry in the Green Belt. As part of this we require – in relation to *Development Management Plan* policies DM18 and DM19 – specific information from applicants to consider the functional need for someone to live on the site, whether the enterprise is, or will become financially viable, and whether such viability is likely to be sustainable in the long term, particularly for permanent homes. We also need to carefully consider the size and siting of permanent or temporary accommodation. The size, for example, should be determined by the needs of the business rather than those of the owner or occupier.

11.42 Greater floorspace than that set out in *Development Management Plan* policy DM18 is permitted only in exceptional circumstances where it can be sufficiently demonstrated to us that the functional need of the business truly requires a larger building. Conditions are also imposed to limit the occupation of all new homes to people who are employed, or were last employed, in agriculture in the locality. This ensures that accommodation is kept available to meet the needs of other agricultural businesses in the area as a whole if, for whatever reason, a home is no longer required to meet the needs of the original business. That being the case, applications for the removal of agricultural occupancy conditions will not, therefore, be permitted except in the most exceptional circumstances.

What are the identified issues?

11.43 New homes demonstrated to be necessary to support agricultural and forestry businesses have an impact on the purposes of the Green Belt. However, the principle for allowing their development is established through national policy. Our policy for permanent homes (*Development Management Plan* policy DM18) restricts the size of such buildings to 175 sq.m, which is based on the 25% increase in original dwelling floorspace established within policy DM17. This is considered to be a proportionate response to the *NPPF*, and is our adopted approach. Permitted development rights are also removed for these types of accommodation, as the size of the building is determined by the business needs.

What are the realistic options?

11.44 There are two options that have been identified for these types of homes.

Option	Justification
A. Retain the current policies	*Development Management Plan* policies DM18 and DM19 are considered to appropriate and fit-for-purpose; and in line with the *NPPF*.
B. Do not have policies on agricultural, forestry and other occupational homes	There is a need to provide some more specific guidance on how applications for these types of accommodation would be treated, given the extent of the Green Belt in the district. This approach is not considered to be appropriate.

Development of Previously Developed Land in the Green Belt

> **Tell Us More D.P1.8: How do we address applications for the development of Brownfield (Previously Developed) Land in the Green Belt in the future?**

Where are we now?

11.45 The *NPPF* at paragraph 89 allows the redevelopment of brownfield (previously developed) sites whether redundant or in continuing use (excluding temporary buildings), if the scheme would not have a greater impact on the openness of the Green Belt, and the purpose of including land within it, than the existing development. This was introduced nationally following the adoption of the *Core Strategy*. We therefore introduced a policy within our *Development Management Plan* (policy DM10) to supplement this national position, including further guidance on what is not considered to be previously developed land, as defined in Annex 2 of the *NPPF*.

11.46 Policy DM10 seeks to ensure that any schemes proposing new homes, retail, or other forms of rural diversification, which are not supported in Core Strategy policy GB2, on brownfield land is appropriate, sustainable (in terms of access to roads and services for example), and would not undermine the purposes of the Green Belt. Consideration of potential impact on areas of nature conservation, landscape character or historical importance also needs to be taken into account.

What are the identified issues?

11.47 Promoting the redevelopment of brownfield land has the potential to conflict with the purposes of the Green Belt through impacting on openness in particular. Other principles such as the need to prevent coalescence or merging of towns and villages needs to be carefully considered as this would be contrary to national policy. This is particularly important when considering, for example, a change of use from a relatively low intensity use into residential as this can impact on the character of an area and have a greater impact on the principles of the Green Belt. The sensitivity of the Green Belt on a strategic level also needs to be considered.

11.48 Brownfield development, whilst potentially preserving nearby greenfield land, can have an impact on the Green Belt, and the rural, open nature of our countryside, which is important to local communities (as identified through early community engagement in 2016), by encouraging sporadic, piecemeal development in potentially unsustainable

locations. This can have a detrimental impact on our wider strategy for delivering new homes.

What are the realistic options?

11.49 There are two options that have been identified for the proposals for the redevelopment of previously developed land in the Green Belt.

Option	Justification
A. Retain the current policy on previously developed land	*Development Management Plan* policy DM10 is considered to be appropriate in supplementing the provisions of the *NPPF.*
B. Do not have a policy on previously developed land	Our current policy provides more localised guidance on how applications for the development of previously developed land in the Green Belt in accordance with national planning policy.

Extension of Domestic Gardens in the Green Belt

Tell Us More D.P1.9: How do we deal with applications for the extension of domestic gardens in the Green Belt in the future?

Where are we now?

11.50 A domestic garden can be defined as a private or semi-private area of open space normally attached to a home. Applications to extend domestic gardens beyond the current designated residential area are considered in relation to *Development Management Plan* policy DM22, and are permitted only where the impact on the surrounding environment, or visual amenity (the value, attractiveness or desirability of a particular view) for neighbours or the public is minimal. The size of the proposed garden extension is also taken into consideration; it should not be out of proportion with the size of the existing garden, for example it should not be more than double the size of the existing garden area.

11.51 We currently remove permitted development rights to minimise impact on the openness of the Green Belt through the erection of fences, additional buildings and other built structures. Proposals should also not encroach on other areas of open space, consume valuable agricultural land (particularly that which is Grade 1 or 2), or cause unnecessary disturbance to areas which are of nature conservation importance or the historic environment.

What are the identified issues?

11.52 Garden extensions can be harmful to the visual appearance and openness of the Green Belt; particularly given that permitted development rights allow the erection of additional domestic buildings, structures and other domestic paraphernalia. We currently take a restrictive approach and remove these rights. However in practice this can means that the extended part of gardens cannot be used by residents as part of

the enjoyment of their home. It can also mean that garden areas do not visually form part of garden areas (for example through the erection of fences).

What are the realistic options?

11.53 There are three options that have been identified for proposals to extend domestic gardens into the Green Belt.

Option	Justification
A. Retain the current policy on extension of domestic gardens	Our current policy (*Development Management Plan* policy DM22) – particularly in relation to ensuring that extensions are not disproportionate – is working well. However in practice there are concerns about the removal of permitted development rights, and the ability of home owners to enjoy their gardens.
B. Allow permitted development rights within extended garden areas	Permitted development rights would enable those who have, lawfully, extended their garden into the Green Belt to erect certain structures. This could have an impact on the openness of the Green Belt but it would enable home owners to enjoy their gardens.
C. Do not have a policy on the extension of domestic gardens	*Development Management Plan* policy DM22 provides detailed guidance on how applications for such extensions into the Green Belt would be treated. Having a local policy on this is considered to be an appropriate response.

Parking Standards and Traffic Management

> **Tell Us More D.P1.10: How do we address parking standards and traffic management across the district in the future?**

Where are we now?

11.54 Our current parking standards are set out in *Parking Standards Design and Good Practice Supplementary Planning Document* which are based on evidence developed by Essex County Council in conjunction with the Essex Planning Officers Association. This approach of setting localised parking standards is supported by the *NPPF* (paragraph 39). Our guidance applies minimum car parking standards to residential schemes, including visitor parking, as we recognised that limited parking availability does not necessarily discourage car ownership and can push vehicle parking onto adjacent roads. This impacts both on the amenity of roads and potentially obstructs emergency and other passenger transport vehicles. This approach also applies maximum parking standards for trip destinations, whilst ensuring that provision is adequate. The intention is to encourage other sustainable ways to travel and to reduce congestion, particularly where any schemes are near to train stations. Our broad policy on parking standards in the district is outlined in *Core Strategy* policy T8; which is supplemented by *Development Management Plan* policy DM30.

11.55 We recognise that schemes could have an impact on our highway network. Where this may be the case we want to ensure that there is effective traffic management to create thriving sustainable communities, to improve road safety and reduce air pollution, noise, severance and visual impacts caused by transport and transport infrastructure. Our *Development Management Plan* policy DM31 requires major schemes (which is defined as a scheme for 10 or more new homes are proposed or the site area is 0.5 hectares or more) to prepare a traffic impact assessment to set out clearly how any impact would be mitigated against through appropriate traffic management measures.

What are the identified issues?

11.56 There is a need to ensure that there is appropriate parking within residential and commercial areas, whilst promoting and facilitating more sustainable ways to travel such as walking, cycling or public transport wherever possible. Parking was raised as an issue during the early community engagement programme that took place in 2016; particularly in relation to inadequate off-street parking for larger properties which can lead to increased on-street parking, and within our town centres. This is an issue which is addressed within the *Supplementary Planning Document.* The need for additional disabled parking bays within the Hockley area has been highlighted. However, the *Supplementary Planning Document* has comprehensive guidance and policy on the provision of disabled parking bays in shopping areas. The issue of parking also relates to appropriate traffic management measures within schemes to ensure that safe and efficient movement of people and goods.

What are the realistic options?

11.57 Three options have been identified for parking and traffic management.

Option	Justification
A. Retain our broad policy on parking standards and remove our *Development Management Plan* policy	Both these policies support the implementation of our *Supplementary Planning Document* – which is considered to be fit-for-purpose – as a Countywide strategy for addressing parking standards. It is therefore considered that *Development Management Plan* policy DM30 does not strengthen the *Core Strategy* policy T8 so is no longer appropriate.
B. Retain our current approach to traffic management	*Development Management Plan* policy DM31 is considered to be fit-for-purpose in requiring appropriate traffic management mitigation measures to be planned for and implemented.
C. Do not have policies on parking and traffic management.	It is important that local guidance on parking standards and traffic management for new schemes across the district. This approach is, therefore, not considered to be appropriate.

Homes Businesses

Tell Us More D.P1.11: How do we continue to support the growth of home businesses across the district?

Where are we now?

11.58   Modern technology provides greater flexibility for those who want to start their own business, or those who may otherwise be denied the opportunity to work from the comfort of their own home. Our current policy (policy DM33 in our *Development Management Plan*) however recognises that a balance needs to be struck so that any proposals do not have a negative impact on the surrounding residential area. Not all forms of home working require permission from us – but planning consent is required where there is a material change from the main residential use of a home.

11.59   Policy DM33 does not seek to restrict home businesses to use class B1, which is for general business use, as it is recognised that other uses may be compatible with the main residential use of a home. Any proposals are however considered on a case-by-case basis taking into account the potential impact on neighbours such as amenity, visual character and traffic.

What are the identified issues?

11.60   The number of home businesses in the district is unknown, as businesses under a certain threshold are not liable to pay business rates. However we are keen to continue supporting these businesses at the most vulnerable stage of their lifecycle through the planning process. We do have a lot of entrepreneurial talent within the district – and a low rate of working age residents who claim out-of-work benefits – with many residents aspiring to start their own businesses. Over half of all businesses starting up in the district were recorded as surviving between 2009 and 2013, which is more positive than the rest of the county. We are actively seeking to engage with home businesses, via our economic development service, to enable a two way communication process, where home businesses are able to access information from us and can contact us easily. There is however a balance that needs to be struck between enabling new start-up businesses within the residential area and protecting the amenity of the local area.

What are the realistic options?

11.61   There are four options that have been identified to deal with home businesses.

Option	Justification
A. Retain the current policy	Our current approach in *Development Management Plan* policy DM33 is considered to be appropriate in striking a balance between enabling businesses to start-up and prosper at home, provided they would not have an unreasonable negative impact on the residential nature of the local area or neighbours.
B. Take a more restrictive	We want to continue to support and nurture home

Option	Justification
approach to home businesses	businesses in the district. We have the highest survival rate of new businesses in South Essex as identified in the *EDNA*, and want to continue to improve this trend through supporting start-up businesses. Taking a more restrictive approach to home businesses, which could discourage entrepreneurs in the district and have a negative impact on our local economy, is not considered to be an appropriate approach.
C. Take a more flexible approach to home businesses	Taking a more flexible approach to home businesses could have a greater negative impact on neighbouring properties through impacting on residential amenity and the local road network for example. As home businesses grow – which we support – there are more suitable locations for such businesses to locate to within the district. It is important that the right balance is struck between supporting and nurturing home businesses and considering the impact on neighbours. The need for grow-on space in the district is considered in more detail in the 'Delivering Homes and Jobs' chapter.
D. Do not have a policy on home businesses	This is not considered to be an appropriate response to the need to encourage homes business whilst protecting the amenity of neighbouring properties.

Alterations to Existing Business Premises

> **Tell Us More D.P1.12: How do we deal with proposals for alterations to existing business premises in the Green Belt in the future?**

Where are we now?

11.62   There is an entrepreneurial culture in the district which is reflected within the diverse range of small to medium sized businesses that are located here. Many of these are located within our town or village centres or on land that is formally designated for employment uses. In addition a number of businesses currently operate within the Green Belt – which covers the majority of our countryside – for a variety of historical and operational reasons. These locations are not designated as employment land because they are not appropriate for intensification or additional business uses, as these would negatively impact on the character of the area and would be considered unsustainable. We recognise, however, that these businesses make an important contribution to the local rural economy; although their location still merits Green Belt designation. Therefore an appropriate balance needs to be struck.

11.63   Our current policies support lawfully established businesses in appropriate and accessible locations to encourage the vitality of the local economy and to fulfil the

potential of local businesses. As part of this, we enable rural businesses – that are existing and lawfully established – as set out in *Development Management Plan* policy DM11 to extend their premises based on the original or current building (whichever is applicable) in the Green Belt. On a case-by-case basis we take into account whether the size and scale of proposed extensions are proportionate in terms of the openness of the Green Belt. We do, however, encourage existing units should be utilised, as far as possible, before extensions are permitted. Other considerations such as impact on residential amenity, traffic generation and pollution are also taken into account. Our positive approach to existing businesses in the Green Belt broadly aligns with the *NPPF* in supporting economic growth and a strong economy in rural areas.

What are the identified issues?

11.64 *Development Management Plan* policy DM11 relates to existing businesses in the Green Belt. Whilst the guidance within it is useful, in practice the reference to scale of a proposed extension is open to interpretation which could mean that planning applications are submitted that are much larger than we envisaged for this sensitive area.

What are the realistic options?

11.65 There are three options that have been identified for alterations to existing business premises in the Green Belt.

Option	Justification
A. Retain the current policy on existing businesses in the Green Belt	Our current approach in *Development Management Plan* policy DM11 is broadly considered to be appropriate. However, the undefined reference to scale could be misinterpreted.
B. Include further guidance on the size of extension that would be considered proportionate	This approach would limit the guidance being misinterpreted to potentially allow larger than intended proposals coming forward through the planning application process.
C. Do not have a specific policy on alterations to existing business premises	The majority of the district is designated as Green Belt land. It is not considered to be an appropriate approach to not have a specific policy on alterations to existing business premises in the Green Belt.

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Advertising and Signage

> **Tell Us More D.P1.13: How do manage advertising and signage across the district in the future?**

Where are we now?

11.66 Advertising is necessary for the promotion and functioning of the district's commercial activities, but a balance needs to be struck to ensure that this does not have a negative impact on the accessibility, appearance or value of a particular street scenes or buildings.

11.67 Inappropriate signage which is poorly located, designed or excessively illuminated within the context of the surrounding area can detract from the visual amenity, character and quality of the local environment and may present, particularly with inappropriate illumination, a road safety hazard. A proliferation of signage on one building or along one street can create a cluttered street scene which can cause distractions and confusion for the general public. Also some forms of advertising, such as advertising boards, when clustered can cause uncontrolled clutter in the public realm (i.e. along pavements) and can have the potential to restrict and obstruct access, and provide obstacles for people who are blind or partially sighted. The potential for proposed advertising to create access issues needs to be carefully considered.

11.68 Our *Development Management Plan* policy DM37 provides guidance on the appropriateness of advertising across the district. Specific guidance on advertising in Conservation Areas and Listed Buildings and Conservation Areas is also provided within policy DM38. This is particularly important as several of our Conservation Areas are valuable commercial centres, where significant commercial activities take place. These areas are, however, more sensitive to the presence, and in particular, the style of advertising employed. This approach is supported by the *NPPF*.

11.69 Other types of signage include brown tourism signs. It was noted during the early community engagement in 2016 that there are a number of attractions, destinations and businesses in the district, which could benefit from such signage. These have to be approved by Essex County Council, with the approval process being managed by Visit Essex according to specific guidance[53]. Suitably located brown tourism signs could further enhance the tourism and leisure offer to visitors and help with navigation around the district.

What are the identified issues?

11.70 As most of our commercial centres are also Conservation Areas with numerous Listed Buildings there is a need to strike a careful balance between supporting local businesses through enabling appropriate signage, whilst not undermining the character and value of the historic fabric of the area. There is limited guidance on signage outside the commercial areas, however; for example on roundabouts.

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[53] Procedure for consideration of brown and white tourism signs: mediafiles.thedms.co.uk/Publication/EE-EssW/cms/pdf/Brown%20and%20white%20tourism%20signs%20procedure.pdf

11.71 It is the responsibility of local businesses and other bodies managing a particular attraction or destination to apply for brown tourism signs. Essex County Council's guidance on such signs is clear however that such signage cannot be used for advertising. The intention is to help visitors from outside the local area on the final stage of their journey. We are therefore not responsible for these signs, although we can pro-actively encourage tourism related businesses to apply for brown tourism signage, where appropriate to improve navigation.

What are the realistic options?

11.72 There are two options to consider in relation to advertising and signage.

Option	Justification
A. Retain the current policies on advertising in the *Development Management Plan*	We have taken a proactive approach to advertising through *Development Management Plan* policies DM37 and DM38, which is line with the *NPPF*. This is considered to be an appropriate approach.
B. Do not have a policy on advertising	Failing to have a policy on advertising is not considered to be a suitable response to national policy.

Light Pollution

Tell Us More D.P1.13: How do we light pollution across the district in the future?

Where are we now?

11.73 Inappropriate lighting can create light pollution which can affect rural, coastal and urban areas. This type of pollution can have a negative effect on ecology and wildlife, obscure vision of the stars, and introduce a suburban feel into rural areas which can affect local character and cause stress and anxiety for those adversely affected. Paragraph 125 of the *NPPF* requires local policies to encourage good design to limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation. The *PPG* provides more guidance on how the impact of schemes should be assessed, and notes that for maximum benefit, the best use of artificial light is about getting the right light, in the right place and providing light at the right time.

11.74 Our *Development Management Plan* recognises that light pollution can take several forms, as defined by Environmental Protection UK; intrusive lighting, sky glow, glare and poor lighting. Our policy DM5 sets out the guidance for addressing light pollution. A key part of this policy is to safeguard the environment from unnecessary light spill through the identification of environmental zones. The environmental zone in which a scheme is proposed dictates the permitted lighting threshold that can be reached. Our policy also seeks to minimise the impact of flood lighting for sports and other leisure facilities.

What are the identified issues?

11.75 Our policy seeks to minimise the impact of light pollution wherever possible. However as noted within the *PPG* lighting schemes can be costly and difficult to change, so getting the design right and setting appropriate conditions at the planning stage is important. It also notes that some types of premises (including prisons, airports and transport depots where high levels of light may be required for safety and security reasons) are exempt from the statutory nuisance regime for artificial light, so it is even more important to get the lighting design for these premises right at the outset. This is particularly key in relation to the operations of London Southend Airport.

What are the realistic options?

11.76 There are three options for the delivery of suitable, considerate lighting in the district.

Option	Justification
A. Retain our existing policy on light pollution	*Development Management Plan* policy DM5 is fit for purpose, following guidance from professional bodies. It is considered to take into account appropriate factors in determining the suitability of lighting schemes.
B. Update policy, considering favouring the use of new technologies	Our current policy could be amended to specifically require installation of the best technology (where appropriate) which seeks to reduce the light spillage, glare and sky glow over traditional lighting.
C. Do not have a policy on light pollution	Such an approach is not considered to be a realistic option as national policy requires us to consider the design and potential impact of lighting schemes at the planning application stage.

Contaminated land

> **Tell Us More D.P1.14: How do we address potential contaminated land in the future?**

Where are we now?

11.77 Contaminated land is land that has been polluted with hazardous materials. This may, for example, be due to past industrial uses or storage of industrial substances on land, which means that the issue of contaminated land has the potential to impact upon the reuse of brownfield (previously developed) sites. Part 2A of the Environmental Protection Act 1990 requires Local Authorities to inspect land in their area for threats to human health and the environment from land contamination.

11.78 Our *Contaminated Land Strategy* outlines our inspection regime to identify land that may be contaminated land. The Strategy clearly sets out how land which merits detailed individual inspection within the contaminated land regime, will be identified in an ordered, rational and efficient manner.

11.79 Our current policy in the *Core Strategy* (policy ENV11) supports the development of appropriate contaminated land provided it can be adequately remediated and made 'fit for purpose' for its intended use. Contaminated land is not considered to be a suitable reason for not supporting the development of a site; the *PPG* notes that the responsibility for securing a safe development rests with the developer and/or landowner, although we need to be satisfied that this is the case. The *Environmental Capacity Study 2015* also recognises that development can help to remediate contaminated land.

What are the identified issues?

11.80 As we want to encourage the reuse of suitable brownfield (previously developed) sites over greenfield land wherever possible, it is crucial that contaminated land is identified and appropriately remediated. This can however have an impact on the viability and subsequently the deliverability of brownfield sites for other uses. The *PPG* provides guidance on the role of local development plans where contaminated land has been identified[54]. However, as of October 2017, we do not have any formally declared contaminated land as defined under Part 2A of the Environmental Protection Act 1990. This is reflected in the *Environmental Capacity Study 2015*.

What are the realistic options?

11.81 Two options have been identified in relation to contaminated land.

Option	Justification
A. Retain the current policy on contaminated land	*Core Strategy* policy ENV11 is considered to be fit for purpose in supporting the development of suitable brownfield (previously developed) sites wherever possible, whilst ensuring that appropriate investigation, remediation and mitigation measures are implemented.
B. Do not have a policy on contaminated land	National planning guidance requires that we address the issue of contaminated land through the plan-making process. Failing to have a policy on this is not considered to be an appropriate approach.

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[54] Paragraph: 009 Reference ID: 33-009-20140306

Sustainability Appraisal (SA) of the Rochford Local Plan

Interim SA Report

Rochford District Council
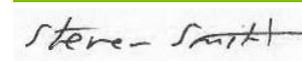
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Quality information

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Revision History

Revision	Revision date	Details	Name	Position
1	27 July 2017	Draft for internal review	Rosie Cox	Assistant Consultant
2	03 August 2017	Revised Draft for internal review and approval	Alastair Peattie	Principal Consultant
3	14 August 2017	Revised Draft for client review	Steve Smith	Technical Director
4	30 October 2017	Revised Final Draft	Alastair Peattie	Principal Consultant

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Table of Contents

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1.   Introduction

1.1   Background

AECOM is commissioned to lead on Sustainability Appraisal (SA) in support of Rochford District Council's emerging new Local Plan (hereafter referred to as the 'Local Plan'). SA is a mechanism for considering and communicating the likely effects of a Draft Plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising the positives. SA of Local Plans is a legal requirement.[1]

1.2   SA Explained

It is a requirement that SA is undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which transposed into national law EU Directive 2001/42/EC on Strategic Environmental Assessment (SEA).[2]

In accordance with the Regulations, a report (known as the SA Report) must be published for consultation alongside the Draft Plan that essentially 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'.[3] The report must then be taken into account, alongside consultation responses, when finalising the plan.

More specifically, the SA Report must answer the following three questions:

1.   What has Plan-making / SA involved up to this point?

    •   Including in relation to 'reasonable alternatives'.

2.   What are the SA findings at this stage?

    •   i.e. in relation to the Draft Plan.

3.   What happens next?

    •   What steps will be taken to finalise (and monitor) the plan?

1.3   This Interim SA Report

This Interim SA Report is published alongside the Issues and Options Document, under Regulation 18 of the Local Planning Regulations. The legally required SA Report will be published subsequently, alongside the final draft ('Pre-Submission) version of the Local Plan, under Regulation 19 of the Local Planning Regulations.

Despite being an interim report, it is nonetheless helpful for this report to provide the information required of the SA Report. As such, questions 1 – 3 above are answered in turn.

Before answering Question 1, two initial questions are answered in order to further 'set the scene': i) What is the plan trying to achieve?; and ii) What is the scope of the SA?

1.4   Rochford District's new Local Plan

Rochford District Council ('the Council') is in the process of undertaking an early review of its current Local Development Plan (LDP) in response to policy and guidance changes at the national and local level, which include the publication of the National Planning Policy Framework (NPPF), National Planning Practice Guidance (NPPG) and updated evidence (e.g. the South Essex Strategic Housing Market Assessment). It will include strategic and detailed planning and development management

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[1] Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (2012). The Town and Country Planning (Local Planning) (England) Regulations 2012 require that an SA Report is published for consultation alongside the 'Proposed Submission' plan document.
[2] The SA process incorporates the SEA process. Indeed, SA and SEA are one and the same process, differing only in terms of substantive focus. SA has an equal focus on all three 'pillars' of sustainable development (environment, social and economic).
[3] Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004

policies, land allocations for housing, employment and mixed use and identify areas in the District for protection.

Figure 1: Rochford District
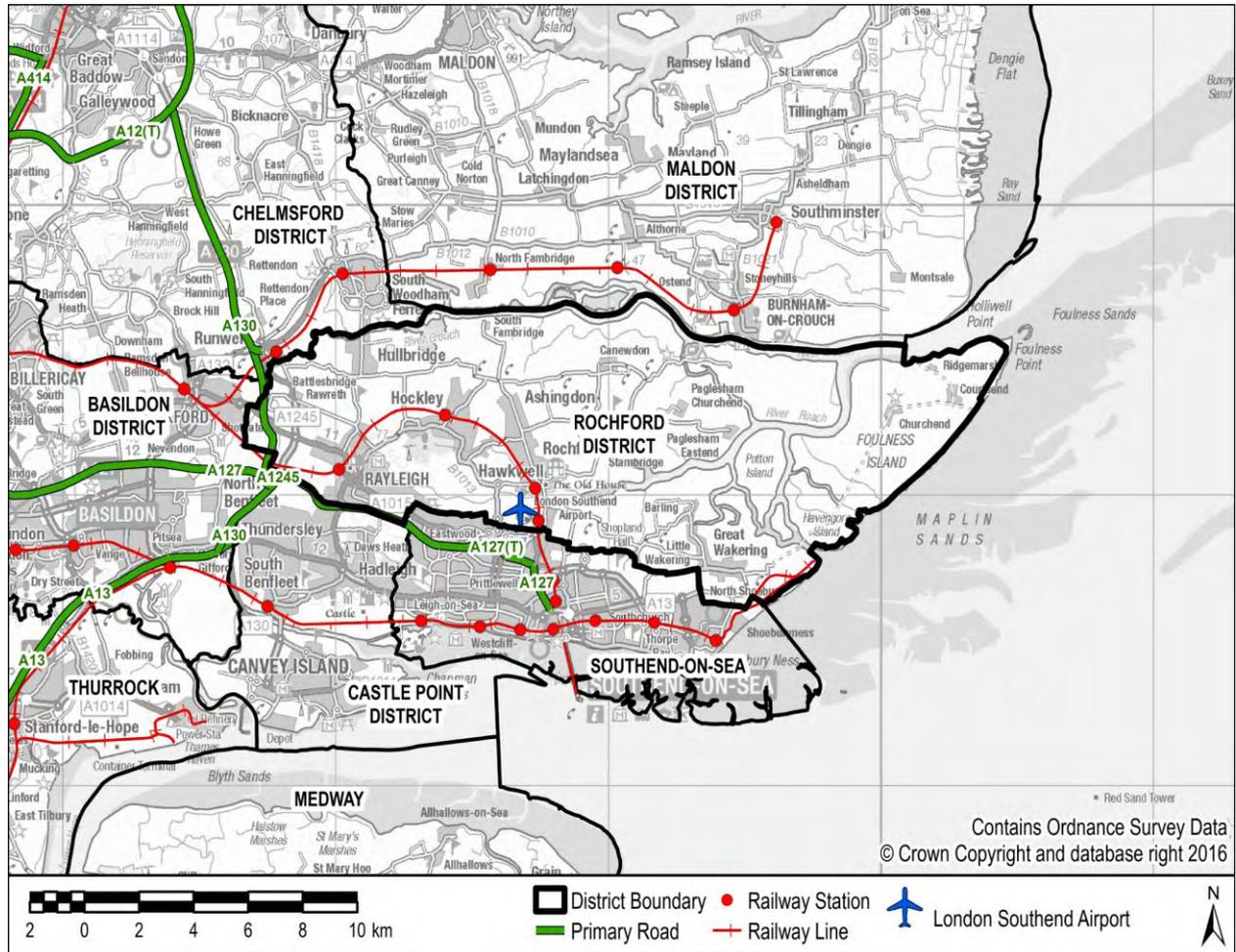
1.4.1   Issues and Options Document

The Issues and Options Document represents the Council's first public stage of plan preparation in accordance with the Town and Country Planning Regulations (2012). In line with Regulation 18 the Council are undertaking this consultation to inform future stages in the preparation of the Local Plan.

The Issues and Options document sets out a number of key District-wide challenges in preparing the new Local Plan and planning positively for growth in homes, jobs and associated infrastructure. It proposes a number of key issues for discussion. These include options for policies which may be needed in the Local Plan to deliver good growth, high quality design, jobs and economic activity and protection of the natural and built environment. What is the scope of the SA?

1.4.2   Scoping

The aim here is to introduce the reader to the scope of the SA, i.e. the sustainability objectives that should be a focus of (and provide a broad methodological framework for) SA. Further information on the scope of the SA - i.e. a more detailed review of sustainability issues/objectives as highlighted through a review of the sustainability 'context' and 'baseline' - is presented in the Scoping Report.

The Regulations require that *"When deciding on the scope and level of detail of the information that must be included in the Environmental Report* [i.e. the SA scope], *the responsible authority shall consult the consultation bodies"*. In England, the consultation bodies are the Environment Agency,

Historic England and Natural England.[4] A Scoping Report was sent to the statutory consultees for comment in December 2016. The responses received were taken into account and amendments made to the baseline information and draft SA Objectives where necessary. A Final Scoping Report was produced in March 2017 and is available on the Council's website.

1.4.3   SA Objectives

Table 1 presents the draft sustainability objectives - grouped under nine topic headings - established through SA scoping, i.e. in light of context/baseline review, identified key issues and responses from statutory consultees.

Taken together, the sustainability topics and draft objectives presented in Table 1 provide a methodological 'framework' for appraisal.

Table 1: SA Objectives

SA Objectives	Decision-aiding questions
Biodiversity	
Protect and enhance biodiversity within and surrounding the District. *Relevant SEA Topics:* *Biodiversity, flora & fauna* *Relevant NPPF Paragraphs: 109 & 117*	Will the option/proposal help to: • Avoid, or if not possible minimise impacts on biodiversity, ancient woodland, nationally or locally protected sites and provide net gains where possible? • Protect and enhance ecological networks, including those that cross administrative boundaries? • Minimise recreational impacts on designated sites, in particular European sites?
Climate Change	
Promote climate change mitigation in Rochford District. *Relevant SEA Topics:* *Climatic factors* *Relevant NPPF Paragraphs:* *93-108*	Will the option/proposal help to: • Promote the use of sustainable modes of transport, including walking, cycling and public transport? • Reduce the need to travel? • Promote use of energy from low carbon sources? • Reduce energy consumption and increase efficiency? • Promote climate change mitigation to address the impacts on the water environment?
Support the resilience of Rochford District to the potential effects of climate change. *Relevant SEA Topics:* *Climatic factors & water* *Relevant NPPF Paragraphs:* *93-108*	Will the option/proposal help to: • Direct development away from areas at risk of all forms of flooding as per the sequential test, taking into account the likely effects of climate change? • Make development safe where it is necessary within an area of flood risk and without increasing flood risk elsewhere? • Sustainably manage water run-off, with priority given to SuDS, ensuring that the risk of flooding is not increased and where possible reduced? • Improve and enhance multifunctional green infrastructure networks in the District (and beyond) to support adaptation to the potential effects of climate change? • Support the priorities identified in the Essex and

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[4] In accordance with Article 6(3).of the SEA Directive, these consultation bodies were selected because *'by reason of their specific environmental responsibilities,[they] are likely to be concerned by the environmental effects of implementing plans and programmes.'*

SA Objectives	Decision-aiding questions
	South Suffolk Shoreline Management Plan?

Landscape and Historic Environment

Protect and enhance the significance of the District's historic environment, heritage assets and their settings. *Relevant SEA Topics:* *Cultural heritage including architectural and archaeological heritage* *Relevant NPPF Paragraphs:* *6-10 & 126-141*	Will the option/proposal help to: • Protect, and where possible, enhance heritage assets and their settings? • Protect, and where possible, enhance conservation areas? • Protect, and where possible, enhance the wider historic environment? • Support access to, interpretation and understanding of the historic environment?
Protect and enhance the character and quality of the District's landscapes and townscapes. *Relevant SEA Topics:* *Landscape* *Relevant NPPF Paragraphs:* *109-125*	Will the option/proposal help to: • Protect and enhance landscape and townscape character? • Support the integrity of the District's conservation areas? • Protect the tranquil areas in the east of the District that remain relatively undisturbed by noise and are important for their recreational and amenity value?

Environmental Quality

Improve air, soil and water quality. *Relevant SEA Topics:* *Soil, water and air* *Relevant NPPF Paragraphs:* *109-125*	Will the option/proposal help to: • Maintain or improve local air quality? • Promote the remediation of contaminated land? • Protect and improve the area's chemical & biological water quality? • Protect groundwater resources?

Land, Soil and Water Resources

Promote the efficient and sustainable use of natural resources. *Relevant SEA Topics:* *Water and soil* *Relevant NPPF Paragraphs:* *47-78*	Will the option/proposal: • Promote the use of previously developed land? • Avoid the use of land classified as best and most versatile agricultural land? • Minimise water consumption? • Reduce the amount of waste produced and move it up the waste hierarchy? • Encourage recycling of materials and minimise consumption of resources during construction?

Population and Communities

Cater for existing and future residents' needs as well as the needs of different groups in the community. *Relevant SEA Topics:* *Population and human health* *Relevant NPPF Paragraphs:*	Will the option/proposal help to: • Meet the identified objectively assessed housing needs for the District? • Ensure an appropriate mix of dwelling sizes, types and tenures to meet the needs of all sectors of the community? • Provide housing in sustainable locations that allow easy access to a range of local services and

SA Objectives	Decision-aiding questions
47-78	facilities? • Promote the development of a range of high quality, accessible community facilities, including specialist services for disabled and older people?
To maintain and enhance community and settlement identity. *Relevant SEA Topics:* *Population and human health* *Relevant NPPF Paragraphs:* *47-78*	Will the option/proposal help to: • Avoid the coalescence of settlements and loss of Green Belt land, where possible? • Provide development in the most deprived areas and stimulate regeneration? • Can development effectively integrate within the existing settlement pattern? • Enhance the identity of a community or settlement?

Health and Wellbeing

Improve the health and wellbeing of the Rochford District's residents. *Relevant SEA Topics:* *Population and human health* *Relevant NPPF Paragraphs:* *69-78*	Will the option/proposal help to: • Promote accessibility to a range of leisure, health and community facilities for all age groups? • Encourage healthy lifestyles and reduce health inequalities? • Enhance multifunctional green infrastructure networks in the District and neighbouring authority areas? • Provide and enhance the provision of community access to green infrastructure? • Improve access to the countryside for recreation? • Promote the use of sustainable transport modes such as walking and cycling?

Transport and Movement

Promote sustainable transport use and reduce the need to travel. *Relevant SEA Topics:* *Population, human health and material assets* *Relevant NPPF Paragraphs:* *29-41*	Will the option/proposal help to: • Reduce the need to travel through sustainable patterns of land use and development? • Encourage modal shift to more sustainable forms of travel? • Enable transport infrastructure improvements? • Facilitate working from home and remote working? • Provide improvements to and/ or reduce congestion on the existing highway network?

Economy

Support a strong, diverse and resilient economy that provides opportunities for all. *Relevant SEA Topics:* *Population and human health* *Relevant NPPF Paragraphs:* *18-22, 42 & 43*	Will the option/proposal help to: • Facilitate the provision of the right type of employment land in the right place? • Provide employment in the most deprived areas and stimulate regeneration? • Support the economic vitality and viability of the District's town centres? • Create opportunities for a variety of businesses and people to flourish in the District? • Support the rural economy? • Support the visitor economy?

SA Objectives	Decision-aiding questions
	• Facilitate working from home, remote working and home-based businesses? • Support the growth of London Southend Airport? • Enhance educational opportunities?

SA Objectives	Decision-aiding questions
	• Facilitate working from home, remote working and home-based businesses?
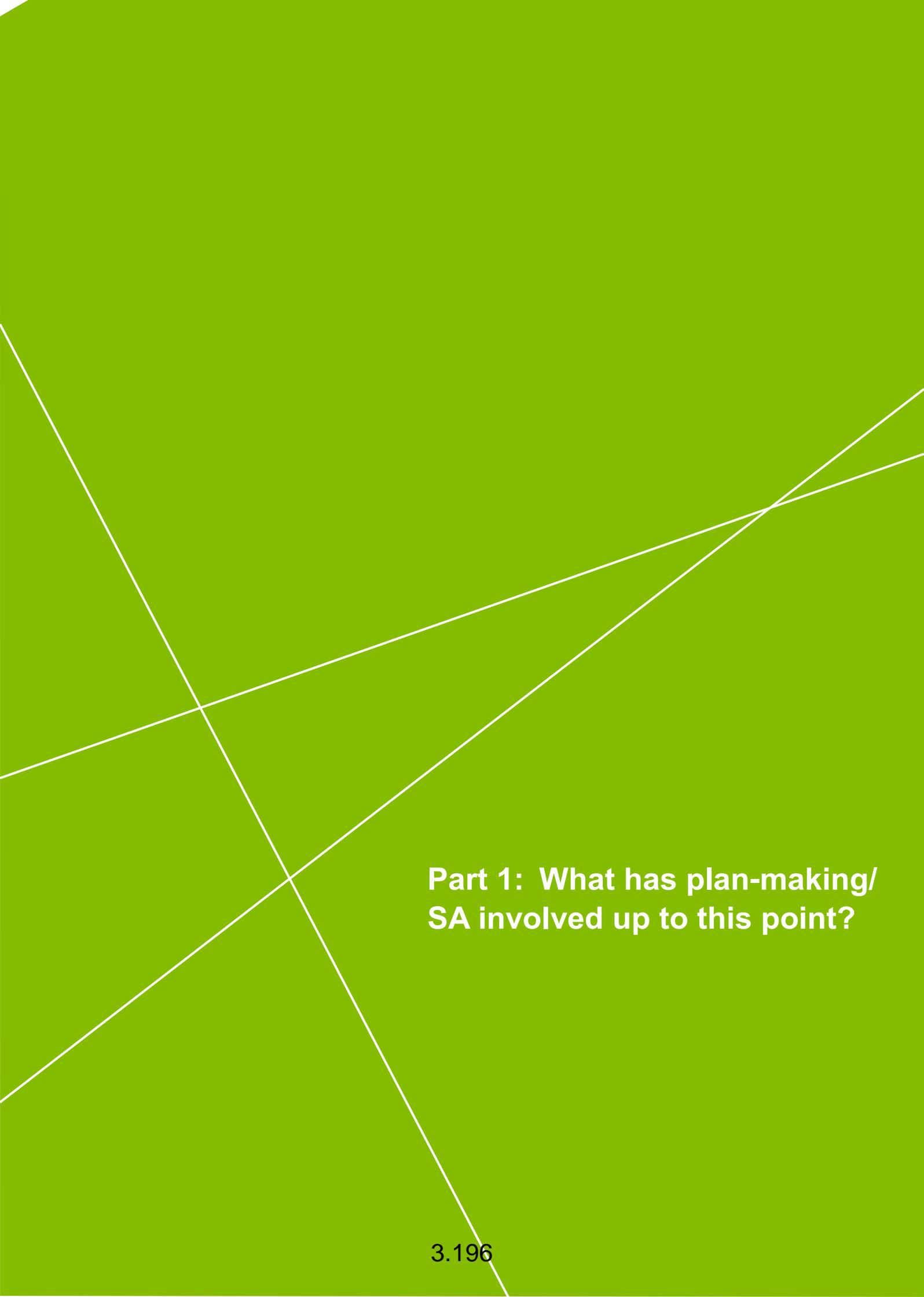
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Part 1: What has plan-making/ SA involved up to this point?

2. Introduction (to Part 1)

The chapter sets out the work undertaken by the Council to date in the preparation of the Local Plan and the Issues and Options document.

2.1 Background

The Council began preparation of the new Local Plan in 2016 which will set the strategy for the future development of the District beyond 2025 - the period covered by the current local development plan. The new Local Plan will replace a number of the adopted policy documents which form the local development plan for the District.

The Council has been developing and preparing the evidence base to inform plan-making. A wide range of studies have been, and will be, undertaken. These include studies on the need for new homes, infrastructure, open spaces, and the character of the District's built-up areas and landscapes.

2.2 Developing alternatives

A revision to the South Essex Housing Market Assessment (SHMA) was published in May 2016, and updated in June 2017 to reflect more up-to-date national household projections, as required by the Planning Practice Guidance (PPG). Its purpose is to assess the future requirement for affordable and market housing within the wider Housing Market Area (HMA) that comprises the local authority areas of Basildon, Castle Point, Rochford, Southend-on-Sea and Thurrock. The SHMA Addendum identifies a revised objectively assessed housing need (OAHN) of between 331 and 361 new homes per year for Rochford District, which takes account of any past under-delivery up to 2014. The SHMA Addendum also identifies an affordable housing need for the District of 296 affordable homes per year up to 2037.

The currently adopted policy documents and updated evidence, including SHMA and SA Scoping Report (March 2017), led the Council to identify five strategic priorities for the future development of the District:

- Strategic Priority 1: The homes and jobs needed in the area.

- Strategic Priority 2: The provision of retail, leisure and other commercial development.

- Strategic Priority 3: The 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: The provision of health, security, community and cultural infrastructure and other local facilities.

- Strategic Priority 5: Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

The strategic priorities have been taken from the National Planning Policy Framework (NPPF) 2012, and set out the key localised challenges and issues that need to be addressed through the new Local Plan. Informed by the currently adopted policy documents and emerging evidence base, the Council has identified a range of options to address the key challenges and meet future needs of the District.

Part 2: What are the SA findings at this current stage?

3. Introduction (to Part 2)

The aim of this chapter is to present an appraisal of the options presented within the Issues and Options document against the SA topics.

3.1 Methodology

The Issues and Options document sets out the key District-wide challenges and strategic priorities for preparing the new Local Plan. It proposes a range of different options to address key issues and provides an early opportunity for stakeholders to comment on these and suggest alternatives. It is important to note that, at this stage, the majority of options identified for key issues are not mutually exclusive. This means that an individual option is unlikely to be progressed alone; it is more likely that a combination of the options would be taken forward by the Council to address the issue in question.

The approach and method for the SA at this stage reflects the early stage of plan-making and high level nature of the Issues and Options document. An appraisal narrative has been produced to identify and evaluate the 'likely significant effects' of the options with respect to the baseline drawing on the sustainability topics and objectives identified through scoping (see Chapter 2, above) as a methodological framework. To reiterate, the sustainability topics are:

- Biodiversity

- Climate Change

- Landscape and Historic Environment

- Environmental Quality

- Land, Soil and Water Resources

- Population and Communities

- Health and Wellbeing

- Transport and Movement

- Economy

The appraisal focusses on key issues and highlights differences between the options where relevant. Where no effects or significant differences between options are identified, then options/ SA topics may not be specifically referred to within the appraisal narrative. The appraisal narrative is structured according to the five strategic priorities set out in Section 2.

Every effort is made to predict effects accurately; however, this is inherently challenging given the early stage in plan-making and high level nature of the options under consideration. Given uncertainties there is a need to make assumptions, e.g. in relation to the way in which the plan might be implemented and aspects of the baseline that might be impacted. Assumptions are made cautiously, and explained within the text (with the aim to strike a balance between comprehensiveness and conciseness/ accessibility) where necessary. In many instances, given reasonable assumptions, it is not possible to predict 'significant effects' or any significant differences between the options, but it is nonetheless possible and helpful to comment on merits (or otherwise) of the options in more general terms.

3.2   Appraisal of the options

3.2.1   Strategic Priority 1: Delivering homes and jobs

Objectively Assessed Housing Need (OAHN)

Table 2: Objectively Assessed Need (OAN) options

	Option	Justification as presented in the Issues and Options document
A.	Seek to provide as much of the District's housing need within our area, as far as possible, given environmental and other constraints.	There is a need to carefully consider whether the District can accommodate all our need, identified in the *South Essex SHMA*, given the environmental and other constraints such as Green Belt. Failing to provide for all our need, if there is no reasonable justification and evidence, would be contrary to national policy and guidance.
B.	Work with neighbouring Local Planning Authorities to ensure that housing need across the South Essex housing market area is effectively met.	Under the Duty to Co-operate, we are required to work together to ensure that housing needs are met. If we do not co-operate with other authorities, it is likely that any plan we produce would be found to be unsound. The national policy and guidance advocates a plan-led system, so it is important to have an up-to-date plan in place, to avoid speculative schemes coming forward.
C.	Consider a policy requirement to require a percentage of new market homes on schemes to be available to residents on a first-come, first-served basis for a limited period of time	This would provide residents with the opportunity to access market housing as a priority on a percentage of new market homes. This approach would ensure that such housing would continue to meet the needs of residents wherever possible.

With regards to meeting the OAHN identified through the SHMA, three options have been identified under Strategic Priority 1 (SP1). All three options identified in Table 2 take positive approaches to meeting the housing need, performing positively in terms of the population and community SA topic. Option A takes the environmental constraints of the plan area into consideration, which would have positive effects on SA topics including biodiversity, landscape and historic environment, and land, soil and water resources. Whilst Option A focuses on the physical constraints of the area, it also recognises that if OAHN can't be delivered for environmental reasons, there will need to be clear evidence based justification, to ensure compliance with national policy and guidance.

Option B further supports the need to comply with national policy under the Duty to Co-operate (DtC), referring to the wider needs of the HMA and encouraging constructive engagement with local planning authorities, supporting strategic economic growth. This option would deliver a more dispersed distribution of growth across the HMA, enabling more communities and neighbourhoods to benefit from the delivery of housing, employment and associated infrastructure. For example, Option B would have positive effects on meeting the needs of the ageing population of the District, potentially allowing older people to downsize more effectively,   Option A may still deliver these benefits to the community; however, this will be on a smaller scale given the constraints within the District. Option B has the potential to deliver housing away from the existing centres, being less constrained by environmental issues such as flood risk and Green Belt policy, which limit Option A.

Whilst being less constrained by the natural environment, Option B is also able to take advantage of the Districts' transport links to central London and London Southend Airport. Given the good links available locally, travel by rail is likely to continue to be a dominant mode of travel for work purposes. Taking advantage of these strong local links would likely provide for further growth of the economy, having an enhanced positive effect compared to other growth options.

Where options A and B set out strategic alternatives, Option C takes a different approach, considering a specific policy requirement. This would provide residents with the opportunity to access market housing as a priority on a percentage of new market homes. This would have significant positive effects on population, supporting community cohesion.

Whilst all options highlight reasonable approaches, the options themselves are not mutually exclusive. Decisions over the delivery of housing should be multi-dimensional, taking into consideration a variety

of factors. For example, the distribution of growth under a combination of Options A, B and C could result in the delivery of large scale development that might be more likely to provide for significant improvements to community infrastructure, be situated so as to be less harmful to the environment *and* meet existing and future residents' housing needs.

It is however noted that the benefits derived from new development will depend on siting new development appropriately through spatial planning, and creating a clear spatial strategy for the District, underpinned by a well-informed set of development management policies*.*

3.2.1.1   Distribution strategy

Table 3: Distribution strategy options

	Option	Justification as presented in the Issues and Options document
A.	Increase density within the existing residential area – which would require an amendment to our current density policy	National policy encourages the effective use of brownfield (previously developed) land, provided they are not of high environmental value (*NPPF* paragraphs 17 and 111). Land within the existing residential area could deliver more homes – particularly in proximity to town centres and sustainable transport hubs – provided this would not have a detrimental impact on design and amenity for example, and other material planning considerations. This approach would reduce pressure on land elsewhere to deliver new homes, and would likely require an amendment to our current policy on density (*Development Management Plan* policy DM2), which sets a minimum of 30 homes per hectare, but does not set out criteria for increasing density in town centres and around sustainable transport hubs for example. *Development Management Plan* policy DM3 also supports appropriate infilling and residential intensification.
B.	Increase density on allocated residential sites	Similarly allocated sites that have not yet been delivered could accommodate more new homes, provided this would not have a detrimental impact on design and amenity for example, and other material planning considerations. Ensuring that identified sites are utilised efficiently is advocated in the *Housing White Paper* which seeks to discourage building at lower densities (however this is defined). This approach would reduce pressure on land elsewhere to deliver new homes.
C.	Several small extensions to the existing residential area	Small extensions that relate well to the existing residential area tend to be serviced by infrastructure and services such as schools and shops. The *Housing White Paper* expresses clear support for small and medium-sized house builders, and the delivery of small and medium-sized sites to deliver new homes more quickly than larger house builders. Although this is a reasonable approach, cumulatively with the current structure of S106 and CIL, this could impact on the level of funding secured to deliver meaningful mitigation to offset new homes delivered. However, the impact may not be so severe if considered in conjunction with other options.
D.	A number of fewer larger extensions to the existing residential area	Larger extensions that relate well to existing residential area are serviced by infrastructure and services such as schools and shops. These sites can contribute more to improving existing infrastructure and deliver new infrastructure through S106 and CIL to mitigate the impact of any scheme.
E.	A new settlement	The Government has already expressed support for ten new garden towns and cities and 14 new garden villages. We are required to consider all reasonable options to deliver new homes within in our area. There is an opportunity to consider, and potentially deliver, a new, sustainable settlement in the District, supported by necessary infrastructure, although this would depend on developing a range of evidence.

Table 3 details the five potential options (A-E) that have been put forward for the distribution of new homes across the District. Options A and B seek to increase densities in the existing residential area, boosting utilisation in current development locations, and reducing pressure for development of land beyond existing urban areas. This is of particular significance considering 74% of the District is designated as Green Belt land.

In addition to positive effects on land resources, Options A and B will have positive impacts on the population and communities SA topic due to increasing development in well-connected areas. However, whilst Options A and B may support additional housing in areas with good access to

facilities and services, the population increase would likely place pressure on the capacity of these facilities (on the assumption of a lag between population growth and infrastructure delivery). For example, with regard to access to open space and amenity space there is an existing uneven distribution across the District, with most natural and semi-natural greenspaces focused around the Hockley/Hawkwell settlement area. To increase positive effects, development will need to be supported by high quality public spaces, green infrastructure and exemplary design. In this context Options C, D and E would have enhanced positive effects on human health, through the provision of community facilities alongside residential development. This would positively contribute towards meeting the needs of new residents, distributing amenity space equally throughout the District. Options A and B perform negatively in this respect as their delivery would exacerbate pressures on existing green infrastructure and community facilities.

Whilst Option E would include infrastructure delivery, garden villages/towns are envisaged as reasonably self-contained entities, and not extensions to existing towns or villages.[5] In this respect, the new settlement would likely be reasonably self-sufficient in terms of services and amenities (at least eventually) if not employment, and whilst it would meet the needs of new residents in terms of infrastructure provision, it might not substantially benefit the remainder of the District (although it would help alleviate development pressures). Options C and D are considered to most positively support the economic vitality and viability of the District's town centres as they direct growth towards existing residential areas. Option D would best contribute to the improvement and delivery of infrastructure, through Section 106 and the Community Infrastructure Levy (CIL) charge on new development. The provision of larger extensions under Option D would be serviced by infrastructure and services such as schools and shops. This will help address the increased pressure on schools predicted for the District[6], in addition to other community facility requirements.

The Issues and Options Document highlights that Option C would deliver new homes more quickly than Option D. Whilst this may meet some of the housing need at a faster pace, Option C is less likely to be serviced by or deliver significant improvement without external infrastructure and facilities, and might also impact on the level of funding to be secured through S106 and CIL. As such, with regard to offsetting adverse impacts and providing mitigation through infrastructure provision, Option D is expected to perform more positively. This is likely to be of greater significance in areas where community facilities are less accessible in the District. i.e. outside of the larger settlements of Rayleigh, Hockley and Rochford. The delivery of development serviced by infrastructure is expected to ensure the needs of new and existing residents are met, reducing the need to rely on infrastructure in the larger centres.

Options are also likely to vary in performance with regard to transport. There are existing congestion issues in the District mainly attributed to local journeys, school runs and commuting to London or elsewhere for work. As such, Options A and B are likely to direct growth towards areas that are currently experiencing highway infrastructure capacity issues, which has the potential to result in negative effects without appropriate mitigation. Options C, D and E however, include infrastructure delivery to mitigate adverse effects that may arise with development. This is predicted to be less of an issue with Option C due to the small-scale extensions proposed.

A garden village/town (Option E) would ensure that residents have access to good homes, services and recreation, whilst providing job opportunities through the construction and operational phases. However, considering environmental and policy constraints within the District, the provision of a new village/town under Option E may not be viable. It is highlighted within SP1 that a combined approach could be considered, if required. This should be explored by the Council, as the varied constraints across the District may be more appropriately managed through a range of housing delivery options. This hybrid approach has the potential to reduce pressure on the District's existing infrastructure, increase the provision of services and facilities, provide a suitable mix of housing, and also minimise effects on the District's wider landscape and townscape and historic environment.

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[5] Department for Communities and Local Government (2016) Locally-Led Garden Villages, Towns and Cities. Available [online]: https://www.gov.uk/government/publications/locally-led-garden-villages-towns-and-cities
[6] Rochford District Council (2016) Rochford Authority Monitoring Report

3.2.1.2   Housing mix

Table 4: Housing mix options

	Option	Justification as presented in the Issues and Options document
A.	Retain the current policy on types of homes, which takes a flexible, market-driven approach to types	*Core Strategy* policy H5 is responsive to market conditions. However, it lacks guidance of the types of homes that are likely to be needed in the District, taking into consideration the existing housing stock. There is uncertainty for local communities on the type of homes that would be delivered as part of a particular scheme.
B.	Include specific reference to the size and types of homes referred to in the *South Essex SHMA*	This slightly more prescriptive approach would ensure that there is an appropriate mix of homes on a particular scheme, as suggested in the *South Essex SHMA.* However, there could be an element of flexibility to ensure that the policy would not undermine the viability and deliverability of a scheme. A county or region-wide approach could be considered.
C.	Continue to require new homes to meet the *National Technical Housing Standards – nationally described space standards*	Ensuring that schemes meet the national space standards would ensure that all homes are of a suitable standard. It is important however that the right balance is struck between the density of a scheme and the internal floorspace of homes. It is likely that these national standards will be reviewed in due course to be more responsive to different circumstances. This would require an update to *Development Management Plan* policy DM4 on expected standards – reference to good internal layout and being suitable for modern living is considered to still be appropriate.
D.	Do not adopt specific policy on the mix of homes	National policy requires that a good mix of homes is delivered on schemes to meet the needs of a range of people. Failing to have a policy on the mix of homes is not considered to be an appropriate approach to this issue.

Table 5: Affordable homes options

	Option	Justification as presented in the Issues and Options document
A.	Reduce the threshold for the provision of affordable homes as part of a scheme (potentially in line with emerging national policy and guidance)	The threshold for providing affordable homes is currently a scheme of 15 or more homes, or on sites greater than half a hectare. This would mean that more schemes may be eligible to provide affordable homes to buy or rent. This could have an impact on viability of smaller sites, however.
B.	Retain the current threshold for the provision of affordable homes as part of a development scheme	Schemes of fewer than 15 would continue to be ineligible for providing affordable homes. Such schemes therefore would not contribute to meet local need for affordable homes; whether to rent or buy.
C.	Do not have a policy threshold for the provision of affordable homes (potentially rely on emerging national policy and guidance to set the minimum threshold)	All new housing schemes, regardless of the number of homes proposed or the site size, would contribute to the delivery of affordable homes subject to viability. Where on site provision is impractical, we could accept a proportionate financial contribution instead to allow us to provide affordable homes elsewhere in the District. However site provision would potentially still be an issue.

Table 6: Proportion of affordable homes options

	Option	Justification as presented in the Issues and Options document
D.	Reduce the threshold for the provision of affordable homes as part of a scheme (potentially in line with emerging national policy and guidance)	The threshold for providing affordable homes is currently a scheme of 15 or more homes, or on sites greater than half a hectare. This would mean that more schemes may be eligible to provide affordable homes to buy or rent. This could have an impact on viability of smaller sites, however.
E.	Retain the current threshold for the provision of affordable homes as part of a development scheme	Schemes of fewer than 15 would continue to be ineligible for providing affordable homes. Such schemes therefore would not contribute to meet local need for affordable homes; whether to rent or buy.

SP1 proposes options to support a mix of housing, including:

- Affordable housing;

- Homes for older people and adults with disabilities; and

- Care Homes.

Three potential options have been identified for the affordable housing threshold (Table 5). SP1 recognises that increasing the affordable housing threshold is not a viable option and, as such, the alternatives are to reduce (Option A) or retain (Option B) existing thresholds in the adopted Core Strategy, or not to have a policy threshold for the provision of affordable homes at all (Option C). Option B is currently in line with national policy and guidance, and would provide the greatest amount of affordable housing of the three options proposed. Options A and C are seen to be less appropriate as they would not meet the affordable housing need of the area. Table 6 shows the two options that have been identified for the proportion of affordable homes to be provided (D and E). Option E seeks to increase the proportion of homes that developers are required to provide as affordable housing, subject to viability. Whilst this option would have positive effects for the community, and support a mix of housing, it is an ambitious target. It is highlighted that this may not be possible at all sites and, as such, delivery is dependent on viability. Option D retains the existing requirement of 35%, which may be a more realistic option that a higher proportion of schemes can deliver.

Table 7: Care home options

	Option	Justification as presented in the Issues and Options document
A.	Continue the current approach to applications for care homes on an ad hoc basis as applications are received based on available evidence	Although this approach should be effective and respond to needs in a timely manner as it would be based on available evidence; it does not ensure certainty for those requiring specialist accommodation and appropriately plan for provision in the future.
B.	Include a specific policy on the provision of care homes threshold, and identify appropriate locations in conjunction with Essex County Council	This approach would provide certainty for the provision of care homes to meet the needs of those specialist needs, however this would need to be clearly evidenced in conjunction with Essex County Council.

Table 8: Home for older people and adults with disabilities options

	Option	Justification as presented in the Issues and Options document
A.	Continue the current approach to applications for specialist homes – on an ad hoc basis as applications are received based on available evidence	Although this approach should be effective and respond to needs in a timely manner as it would be based on available evidence; it does not ensure certainty for those requiring specialist homes and appropriately plan for provision in the future.
B.	Include a policy on housing mix which requires the provision of specialist homes, such as wheelchair accessibility (part M Category 3), independent living units, sheltered and extra-care housing, over a certain threshold	This approach would provide certainty for the provision of homes to meet the needs of those specialist needs. This policy would replace *Core Strategy* policy H6 on Lifetime Homes which is no longer applicable.

Table 9: Houseboats and liveaboards options

	Option	Justification as presented in the Issues and Options document
A.	Retain the existing policy	The existing policy in the *Development Management Plan* (policy DM24) sets out a criteria based approach to houseboats to ensure that any moorings are appropriately controlled and would not have a negative impact on the environment or other users of the waterways.
B.	Amend the existing policy to strengthen criteria	Houseboats have the potential to be located in the most sensitive environments; so it is important that the policies will minimise or, where possible, prevent any development negative impact, and to strengthen any necessary enforcement

Option	Justification as presented in the Issues and Options document
	action. This could include the design and size of such vessels, domestic paraphernalia and associated operational development.
C. Allocate specific areas of coastline where such uses may be acceptable	Designating an area – the 'planning unit' – would provide greater clarify for local communities and occupiers of such vessels. It would also help with planning enforcement. This approach would require input from Natural England and other bodies.
D. Amend the definition in the *Development Management Plan*	The definition of what constitutes a houseboat could be considered and agreed at the Essex level to assist relevant bodies with the management of such vessel on the county's waterways.
E. Do not have a policy on houseboats	Although houseboats are not specifically referred to in the *NPPF*, we need to be mindful that any moorings and associated occupation on our rivers could have an impact on the local environment. This is not considered to be an appropriate approach.

For care homes, the options identified in Table 7 are predicted to respond positively to the needs of residents. Option A in both cases is considered to have less of a positive effect as it does not provide certainty with regards to deliverability. Enhanced positive effects are likely for Option B, which provides certainty through policy, contributing to mixed and inclusive communities. Option B is encouraged as it looks to ensure that all residents can continue to live healthy and active lives within existing communities

Options for homes for older people and adults with disabilities (Table 8) take the same approach as above, and as such option B is the better performing option.

Table 9 shows that mixed and inclusive communities are further supported through Options A-D regarding the mooring of Houseboats and Liveaboards, which support this type of development.

Table 10: Gypsy, traveller and travelling showpeople options

Option	Justification as presented in the Issues and Options document
A. Retain the current criteria-based policy (*Core Strategy* policy H7)	The criteria within this policy are considered to be appropriate when considering applications for Gypsy and Traveller pitches, although reference to guidance and evidence will need to be updated.
B. Retain the current allocated site (*Allocations Plan* policy GT1)	This site could meet the needs of all households that were identified in the *GTAA 2017* that are on unauthorised sites or have temporary planning permission in the District i.e. those that do and do not meet the definition in the *PPTS*.
C. Allocate a number of smaller Gypsy and Traveller pitches / sites to meet needs	Another approach is to allocate a smaller number of sites throughout the District – however it is likely that these sites would have an impact on the purposes of the Green Belt, in particular openness. A site has already been allocated to meet needs, and is in the early stages of delivery.
D. Consider a mobile home policy for those no longer falling within the Gypsy and Traveller definition	An alternative to providing for all households on the allocated sites is to develop a specific criteria-based policy and allocation for those which do not meet the definition of a Gypsy and Traveller in the *PPTS.*
E. Prepare a more detailed criteria-based policy	A criteria-based policy would enable – in addition to the need that has been identified in the *GTAA* – to be appropriately addressed through the planning system. This would need to highlight that allocated sites meet the needs of our current (i.e. assessed in the *GTAA*) population first
F. Do not have a policy on Gypsy & Traveller provision	This is not considered to be an appropriate option as there is a requirement, as there is for market, affordable and other types of homes, to ensure that adequate provision is made for Gypsies and Travellers through the plan-making process. If provision is not made for these groups over the plan period, this would be contrary to the Equalities Act 2010, for example, other legislation, and national policy. The plan would likely fail the legal and soundness tests at the examination stage.

Table 10 shows the options put forward under SP1 to meet Gypsy and Traveller needs. An Essex Gypsy and Traveller Accommodation Assessment (GTAA 2017) identifies that there is a need for six additional Gypsy and Traveller pitches for the period 2016 to 2033; and that a further need for three pitches may also arise. There is a need for between 10 and 12 pitches for those travellers that do not meet the planning definition.[7] No need has been identified for Travelling Showpeople plots in the District.

Of the options, Options A and B appear to be most achievable, as they would meet the identified need under existing policies whilst minimising adverse impact on the wider environment. Option B supports the provision of a single site under the adopted Allocations Plan policy GT1, which is in a relatively sustainable location (an open and accessible brownfield site adjacent to allocated employment land)[8] and, due to the size of the site, may have flexibility to meet potential additional demand post 2018. Adverse effects are expected through Option C, which seeks to allocate a smaller number of sites throughout the District, possibly impacting on the purposes of the Green Belt. This has the potential to negatively affect landscape, land, soil and water resources, and human health; however, effects could be mitigated depending on specific development design principles. Options D and E look to develop a more detailed *'criteria based'* policy for site allocation, which again may adversely affect the natural environment through dispersed growth. However, the options may include criteria which focuses growth on brownfield land, or in urban locations close to existing development and with access to facilities and amenities. Further policy detail is likely needed to gain a comprehensive understanding of residual effects under Options D and E. Nonetheless, Options D and E would increase provision for Gypsies and Travellers, having a positive effect on these communities through responding positively to local need. Option F is a 'do nothing' scenario and as such performs less positively against population and communities and, as the Council says, is not an appropriate option.

3.2.1.3   Economic growth

Table 11: Employment and economic growth options

	Option	Justification as presented in the Issues and Options document
A.	Continue to support employment growth within the current employment growth policy	*Core Strategy* policy ED1 supports a number of key initiatives to deliver new local job opportunities, and business start ups and business growth in the District. These initiatives are still considered to be of importance over the next 20 years to ensure economic growth. However this could benefit from minor updates to reflect new evidence.
B.	Update the current employment growth policy to include reference to broadband	Despite the roll out of the Superfast Essex broadband programme, there is a need to support continued broadband improvements in the District, as broadband is particularly poor in the rural eastern extent of the District which can impact on rural diversification opportunities, as well as the growth of home businesses. Broadband is considered in more detail in the 'Supporting Health, Community and Cultural Facilities' chapter. *Core Strategy* policy ED1 could benefit from updating to reflect this need.
C.	Update the current employment growth policy to further support new businesses	*Core Strategy* policy ED1 makes reference to an Eco-Enterprise Centre in the District, which would offer invaluable support and advice for early stage businesses at the most vulnerable point in their lifecycle. However the *Grow-On Space Feasibility Study 2016* recommends that there is a requirement for grow-on space for local businesses in the District to support and nurture them. *Core Strategy* policy ED1 could benefit from updating to reflect this need.
D.	Update the current employment growth policy on skills	Our current policy (*Core Strategy* policy ED1) supports the development of a skills training academy to enhance the skills base within the District and match local skills with locally available employment opportunities. Whilst this is still an aspiration, deliverability is likely to be an issue. However up-skilling of our workforce is important and through promoting apprenticeships and working with local businesses this could be supported through the plan-making process.
E.	Include specific reference in the current employment growth policy to tourism and rural	There is a need to support tourism and appropriate forms of rural diversification in the District to deliver local, rural job opportunities and promote rural economic growth. This is considered in more detail in the 'Supporting Health, Community and Cultural Facilities' chapter.

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[7] Department for Communities and Local Government (2015) Planning Policy for Traveller Sites available [online] https://www.gov.uk/government/publications/planning-policy-for-traveller-sites
[8] Rochford District Council (2014) Local Development Framework Allocations Plan

|	Option	Justification as presented in the Issues and Options document
	diversification	
F.	Include specific reference to supporting sustainable travel options and promoting highways improvements	The highway network, and a lack of appropriate and realistic sustainable transport options, can impact on the prosperity of local businesses. It is important that highway improvements and sustainable transport options are supported and promoted to improve accessibility to local jobs for all our working age population, particularly those without access to private transport. This is considered further in the 'Delivering Infrastructure' chapter.

Table 12: Economic growth options over the next 20 years

	Option	Justification as presented in the Issues and Options document
A.	Develop specific policies for each employment site to protect certain uses	This would reflect the recommendations within the *EDNA 2017 to* continue to promote the allocated employment sites, predominantly for business use. The *Employment Land Study* recognises that there has been an increase in leisure uses on some sites which could detract from their impression as 'successful' business locations, such as Brook Road industrial estate. Rochford Business Park also does not have a business ('B class') focus.
B.	Reconsider the allocation of Rawreth and Star Lane industrial estates back to employment	These two industrial estates were reallocated for residential use as they were considered to be 'bad neighbour' sites (Rawreth and Star Lane industrial estates). However there has been no interest to date (as of June 2017) in delivering new homes on these sites. The EDNA 2017 also considered that they are generally well occupied and suggests that they could be reallocated back to employment use to support the existing activities. The impact on our strategy for delivering new homes for the future however, would need to be carefully considered. Also see Option C below.
C.	Review new employment land allocations that do not have planning permission	Three new sites have been allocated for employment land up to 2025. We are required by the NPPF to reconsider whether sites have a reasonable prospect of being delivered. Sites should not just be carried forward into a new plan. • Land to the north west of London Southend Airport in Rochford – The majority of this site is in the process of being delivered, although a reserved matters application has not yet been received for the site (as of June 2017). The remainder of the site however is being promoted for residential uses, despite commercial interest in developing the site to support local employment opportunities in accordance with our Core Strategy and JAAP. Consideration could be given to reallocating this part of the site to Green Belt. • Michelins Farm in Rayleigh – There has been commercial interest in this site and, given its strategic location, it is expected that this site will be delivered for employment use over the current plan period (up to 2025). The Employment Land Study Update 2014 notes that it is located within the strongest commercial market sub-area of Rayleigh and provides an accessible and visible development opportunity. • Land south of Great Wakering – Given the absence of interest in redeveloping the existing employment land at Star Lane, and its continued occupation by vibrant businesses is it not envisaged that this site will come forward for employment use over the plan period. There is however commercial interest in developing the new allocated land in the Allocations Plan for business use.
D.	Retain current strategy and allocate additional employment land	The EDNA 2017 recognises that in addition to our current strategy for delivering new homes and jobs in the District, there is a further need to identify land for employment uses to support local economic growth in the future. Given the lack of interest in delivering new homes on Rawreth and Star Lane industrial estates in particular to date, parts of this strategy may need to be reviewed.
E.	Promote improvements to quality of building stock and intensification of existing sites	The Employment Land Study notes that there are some opportunities to improve the quality of existing building stock (noting that there some uses are more suited to a higher building quality) and some potential to deliver further units on the existing industrial estates, where appropriate.
F.	Strengthen policy	Both the *EDNA 2017* and the *Employment Land Study Update 2014* recognise

Option	Justification as presented in the Issues and Options document
stance on access improvements	that there are challenges with access to some employment sites. Purdeys industrial estate in Rochford in particular would significantly benefit from access improvements which could unlock potential opportunities to intensify the site.
G. Do not have a policy on employment land	This is not a feasible option as there is evidence of an increase in demand for industrial units and offices over the next 20 years. An increased supply of quality building stock on sustainable, well located sites is needed to meet this demand.

Rochford District is home to 3,320 businesses (2012) that provide a diverse range of jobs over an equally diverse range of sectors. The District has an economic participation rate of 70.8% which is in line with the regional and national context (**Figure 2**).   65.4% of the economically active population is in employment, which is the highest among all benchmarks. The unemployment rates in the District have remained consistently low[9].

Figure 2. Resident population age structure (2011)
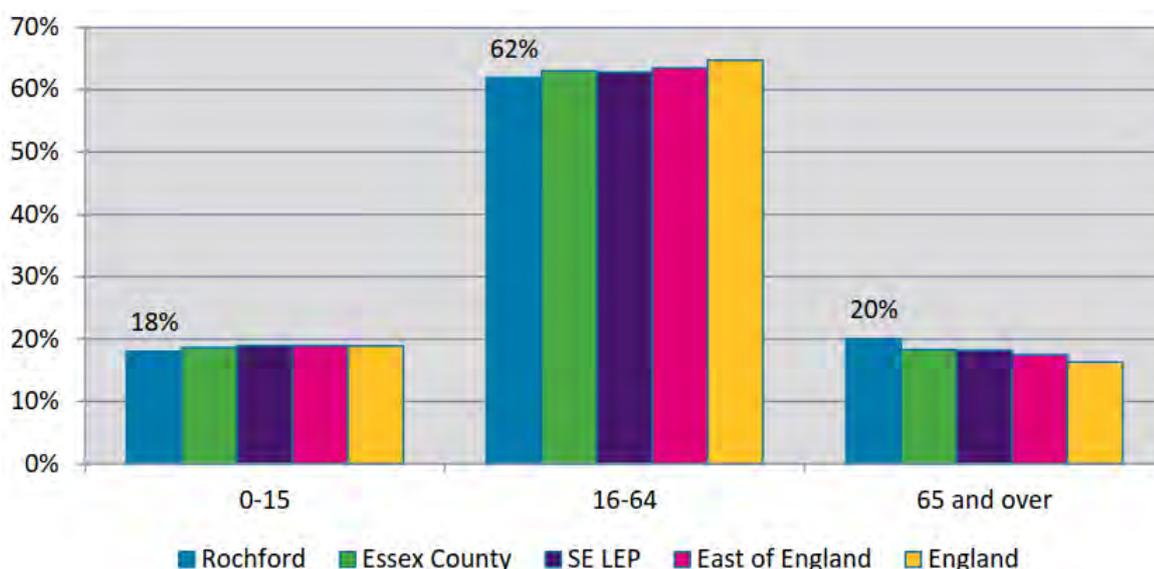
(Source Rochford District Council (2015) Employment Land Study Update 2014)

The six options identified in Table 11 to support employment and economic growth in the District take similar approaches; with the exception of Option A which is not seen to be a feasible option by the Council. Options B to F are suggestions for updates to the existing Core Strategy policy ED1, which, if the plan was being ambitious, could all conceivably be reflected in Local Plan policy. The implementation of a number of, if not all options, would have long-term positive effects on the economy through the delivery of improved tourism, skills, and infrastructure. The tourism and visitor economy in particular provides significant opportunities for growth in the District, and should be a focus for economic development.

SP1 further highlights seven potential options for helping to deliver economic growth via the development of employment sites in the District (Table 12). Again, options are not mutually exclusive, and should be considered in-combination to fully meet the District's needs and aspirations. All options look to promote land for employment use which would contribute positively to the growth of the economy. Option A reflects the recommendations within the South Essex Economic Development Needs Assessment (EDNA) 2017[10] to continue to promote the allocated employment sites, predominantly for business use. This will support the economic vitality and viability of the District's centres.

Options B, C and D recognise that there is a need to identify additional land for employment use to support local economic growth in the future. Option C looks to take full advantage of the opportunity

[9] Rochford District Council (2015) Employment Land Study Update 2014
[10] South Essex Economic Development Needs Assessment (2017)

for new deliverable sites such as Michelins Farm in Rayleigh. These options would actively promote the development of new employment areas to serve towns and villages throughout the District, whilst also utilising the transport network available and improving accessibility through Option F. This would have long term positive effects for population, human health and transport, encouraging sustainable modes of transport such as walking and cycling where possible. It is therefore considered that a combination of Options A-F should be progressed to meet the future economic needs of the District.

Table 13: London Southend Airport options

	Option	Justification as presented in the Issues and Options document
A.	Retain and update the *Core Strategy* policy supporting the airport's growth	*Core Strategy* policy ED2 is considered to be appropriate in supporting this key economic driver in the District. However it could benefit from updating as the *JAAP* has now been prepared.
B.	Retain the existing policy in the *Allocations Plan*	*Allocations Plan* policy NEL3 sets out the area that the *JAAP* covers, which is fit-for-purpose.
C.	Retain the existing policies in the *JAAP*	The *JAAP* is considered to be fit-for-purpose in setting out appropriate controls on the operations at the airport up to 2031. The *JAAP* is also beginning to deliver significant new employment land to the north west of London Southend Airport and associated access improvements.
D.	Continue to support surface access improvements in and around the airport	*Core Strategy* policy T2 seeks to prioritise the improvements of the roads providing surface access to the airport. This can include not only local roads, but also the strategic road network such as the A127. This is still a priority, and could be included within any future Community Infrastructure Levy (CIL) or similar.

Table 13 shows that options A-C for London Southend Airport seek to retain and update existing planning policy set out in the adopted Core Strategy, Allocations Plan and London Southend Airport and Environs Joint Area Action Plan (JAAP). Option D seeks to continue support for surface access improvements in and around the airport. None of the options are mutually exclusive and it is important for the new Local Plan to support proposed development within and around the airport as well as seek new opportunities if they arise.

3.2.1.4   Tourism and rural diversification

Table 14: Tourism and rural diversification options

	Option	Justification as presented in the Issues and Options document
A.	Continue to support current defined forms of green tourism and rural diversification as set out in our current policies	Our current approach is set out in Core Strategy policy GB2 and Development Management Plan policies DM12, DM13, DM14 and DM15. The number of applications and enquiries that have been received about rural diversification opportunities has increased in the last few years. There is a need to support rural businesses in the longer term as the rural economy changes.
B.	Expand the current approach to include other forms of rural diversification	The range of applications and enquiries received since 2011 have gone beyond those that current policy advocates as appropriate forms of diversification, for example wedding venues. Such activities could be considered appropriate provided they would not have an undue negative impact on the Green Belt. This is similar for temporary camp sites, which could encourage short stay trips in the District, provided they were appropriately located, sensitively managed and would not undermine the purposes of the Green Belt.
C.	Do not support rural diversification	Rural diversification – if sensitive to the setting of the natural and historic environment – can help support the rural economy and provide local employment opportunities. This is not considered to be an appropriate option; and is not an approach supported by the NPPF.

Option	Justification as presented in the Issues and Options document

The rural economy plays a large part in the economic vitality of the District. In March 2011, 23% of Rochford District based businesses were classified as being rural businesses, showing the strength of the District's rural economy.[11] However, it is also recognised within this context that consideration must be given to the openness of the Green Belt. The Council believes that it will be possible to promote rural tourism in a sustainable manner which respects biodiversity and the character of the Green Belt.[12]

The District's important tourism offer and historic and cultural legacy provides significant opportunities for the economy. Rochford District has been identified as the 'green' part of the Thames Gateway and as having the potential to be the arts and cultural opportunities area for the sub-region. A focus on tourism in the District can bring many broader benefits that will contribute to economic growth for local communities. For example, there is opportunity in the District for tourism to diversify the economy, responding to the limited number of facilities to enable people to live and work in the District (including bed and breakfasts, small hotels, and temporary camp sites).

SP4 identifies two viable options for tourism and rural diversification (Options A and B, Table 14), as Option C is not seen to be appropriate by the Council. Option A seeks to retain existing policy, whilst Option B seeks to expand the existing approach to include other forms of rural diversification. Promoting the development and diversification of agricultural and other land-based rural businesses would provide a range of positive effects for SA topics including the economy, population and communities as well as human health. Option B would provide benefits to businesses in rural areas, whilst also supporting communities and visitors, and respecting the character of the countryside through sensitive management and appropriate location of development (i.e. taking into consideration potential transport and accessibility issues in rural settings). Positive effects are also expected for biodiversity and the historic environment as the District's tourism opportunities are focused primarily on the themes of heritage, countryside and coastline. However, tourism also has the potential to cause damage to the environment, through increased footfall, disturbance, littering, and pollution, As such, the maintenance and enhancement of policies under Options A and B would contribute towards the sustainable economic growth of the District.

3.2.2   Strategic Priority 2: Supporting Commercial Development

3.2.2.1   Town, Village and Neighbourhood Centres

Table 15: Town centre options

	Option	Justification as presented in the Issues and Options document
A.	Retain current *Core Strategy* policies	The broad town centre policies within the *Core Strategy* are considered to be appropriate in directing retail development to the District's town centres through the sequential approach supported by the *NPPF*.
B.	Retain current policies in the *Rayleigh Centre Area Action Plan*	The area specific policies within the *Rayleigh Centre Area Action Plan* are considered to strike an appropriate balance between promoting the vibrancy and vitality of the town and facilitating appropriate development opportunities whilst respecting the historic character of Rayleigh.
C.	Retain current policies in the *Rochford Town Centre Area Action Plan*	The area specific policies within the *Rochford Town Centre Area Action Plan* are considered to strike an appropriate balance between promoting the vibrancy and vitality of the town and facilitating appropriate development opportunities whilst respecting the historic character of Rochford.
D.	Retain current policies in the *Hockley Area Action Plan*	The area specific policies within the *Hockley Area Action Plan* are considered to strike an appropriate balance between promoting the vibrancy and vitality of the town and facilitating appropriate development opportunities whilst respecting the individual character of Hockley.
E.	Review the town centre	These plans were adopted post-publication of the NPPF and PPG and are considered to be fit for purpose. In addition, opportunity sites and employment

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[11] Rochford District Council (2014) Rochford District Growth Strategy
[12] Ibid

	Option	Justification as presented in the Issues and Options document
	Area Action Plans	land identified in the plans have been assessed within our evidence base.
F.	Do not have policies on town centres	This approach is considered to be contrary to the *NPPF* and is not considered to be appropriate.

Rochford District is bounded by the local authority areas of Southend-on-Sea, Castle Point, Basildon and Chelmsford. The District itself contains three main town centres - Rayleigh, Hockley and Rochford -which are located to the west of the District. These main centres each provide for the local shopping and leisure needs of their communities, and are complemented by a number of smaller village and neighbourhood centres dispersed throughout the District.

SP2 identifies six options for the growth of the town centres over the plan period (Table 15). Of the six, Options A-E seek to retain/review existing planning policy, while Option F is to avoid having town centres policies; however, this is contrary to the NPPF. Each of the three town centres is currently supported by an Area Action Plan (AAP) which provides a planning framework to guide their evolution and secure their future prosperity. In light of the AAPs, Option E intends to review the documents, however this is an arguably futile exercise, considering the plans were adopted post-publication of the NPPF and PPG and are considered to be fit for purpose. In addition, opportunity sites and employment land identified in the AAPs have been assessed within the Council's evidence base, providing transparency in relation to individual development options. Options A-D therefore consider that existing policies are appropriate for directing the growth of the town centres throughout the plan period. The options set out are not 'either/or' and instead a combined approach should be taken which addresses all of the District's three main centres, seeking opportunities to maintain and enhance their vitality.

Table 16: Village and neighbourhood centre options

	Option	Justification as presented in the Issues and Options document
A.	Retain current *Core Strategy* policy	*Core Strategy* policy RTC3 which seeks to protect local shops in village and neighbourhood centres is considered to be appropriate, as it promotes more sustainable shopping/travel patterns. Local top-up food shops provide a lifeline for those without access to public or private transport.
B.	Retain existing *Development Management Plan* policy	*Development Management Plan* policy DM36 sets out circumstances when conversion from retail to non-retail, and non-retail to residential may be considered appropriate. This policy is considered to be fit-for-purpose in further supporting the retention of local facilities.
C.	Do not have a policy on village and neighbourhood centres	This approach is considered to be contrary to the *NPPF* and is not considered to be appropriate.

National and local policy indicates that it is important for the District's town centres to maintain and strengthen their role in the retail hierarchy. The smaller centres should continue to perform a more local function meeting day to day shopping and service needs.[13] Table 16 sets out the options proposed for village and neighbourhood centres, which again seek to retain existing policies with no amendments. The Core Strategy and Development Management Plan policies are considered to be fit-for-purpose, supporting the function of the District's village and neighbourhood centres, having a positive effect on human health and population. The options set out are not 'either/or' and instead a combined approach, as suggested above, would best support the growth of the District's village and neighbourhood centres.

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[13] Rochford District Council (2015) Retail and Leisure Study Update

3.2.3 Strategic Priority 3: The 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)

3.2.3.1 Transport

Table 17: Local road network options

	Option	Justification as presented in the Issues and Options document
A.	Retain current policies on the local road network	Core Strategy Policy T1 sets the broad approach to ensuring localised improvements to the local road network as schemes are proposed. It also identifies particular improvements to the east to west road network, and the area serving Baltic Wharf for improvements to support rural employment opportunities. Core Strategy Policy T2 identifies specific roads and junctions for improvement which are supported – some of which have been secured (for example improved access to King Edmund School, Rochford and Rayleigh Weir junction). This aspect of the policy could be updated, depending on the outcome of future modelling work.
B.	Prioritise local roads and junctions between Rayleigh, Hockley and Rochford (B1013), to support and direct funds to improve the local road network	It is recognised that there is an issue of through-traffic on the B1013 between the three town centres, which has a negative impact on the capacity of key junctions across the local road network at peak times. Funding – for example through CIL – could be used to deliver improvements to the local road network between the three towns. This could be informed by detailed future modelling of the road network.
C.	Prioritise local roads and junctions by upgrading the east to west connection north of Rayleigh, Hockley and Rochford, to support and direct funds to improve the local road network	The route from Rawreth Lane in Rayleigh or Watery Lane in Hullbridge along Lower Road is a well used route which bypasses the three town centres, and provides an informal, alternative route into a number of towns and villages across the District. This could be considered through detailed future modelling of the road network as an option to alleviate issues particularly within Rayleigh town centre, as suggested within the AQAP.
D.	Do not have a specific policy on the local road network	This would involve just relying on localised improvements as part of any new development coming forward through the planning application process. This may also mean that resources would be focussed solely on seeking improvements to the strategic road network. However there are recognised issues with the local road network which need to be resolved to increase capacity and reduce congestion where possible. This would be contrary to the NPPF and is not considered to be a suitable option.

Table 18: Strategic road network options

	Option	Justification as presented in the Issues and Options document
A.	Support improvements to the strategic road network	Essex County Council is the highway authority for the District, and is responsible for the A127 west of the Kent Elms junction. Improvements are taking place at the Rayleigh Weir junction to the south of Rayleigh. Funding has been secured for future improvements to the Fair Glen junction to the south west of Rayleigh. This will require land adjacent to the junction to facilitate these improvements, which can be allocated through the new Local Plan. Other improvements may also be identified through the modelling work for the District and South Essex.
B.	Do not have a specific policy on the strategic road network	There are recognised issues with the strategic road network that need to be addressed through cross-boundary working between the relevant highway authorities – in particular Essex County Council and Southend Borough Council. This is not considered to be an appropriate option to address this cross-boundary issue, which is also important for the Duty to Co-operate. This could be informed by detailed future modelling of the road network.

SP3 places great focus on transport and accessibility. Key transport constraints in the District include:

- High levels of car ownership in the District;

- Limited access to public transport in many areas;

- Capacity issues on the highway network;

- Traffic hotspots on A127 and A13; and

- A lower proportion of people travel to work by bicycle or on foot than regionally or nationally.

It is recognised that future growth in the District will increase pressure on existing infrastructure, and as such SP3 addresses road capacity issues by identifying four options for the management of the local highway network (Table 17). Options seek to improve congestion and manage the existing high level of out-commuting to employment locations outside the District, most notably London. Options range from a no policy option, to retaining current planning policies, to prioritising specific sections of the road network that require the most attention. These specified areas are local roads between Rayleigh, Hockley and Rochford (B1013) (Option B), and the east to west connection north of Rayleigh, Hockley and Rochford (Option C). Continuing to work with neighbouring local authorities (and Essex County Council as the Highway Authority) through Options B and C is predicted to have an enhanced positive effect on transport, promoting strategic and more localised improvements to the road network. This will positively contribute towards the growth of the wider economy, through improving transport and accessibility throughout the District. Indirect positive effects are also anticipated in relation to climate change, air quality, human health, and population.

Two further options are identified in Table 18 for managing the strategic road network. Of these, Option A is seen to be the Council's preferred approach, supporting improvements to the A127 road network. The A127 is a key strategic road serving South Essex providing an important east to west connection between Rochford District and Basildon, Castle Point and Southend Boroughs, which has known capacity and congestion issues. Option A promotes junction improvements which will be allocated through the Local Plan. This will reduce congestion at key problem areas, contributing towards improved transport networks, with indirect positive effects on air quality, and health and wellbeing.

Table 19: Sustainable travel options

	Option	Justification as presented in the Issues and Options document
A.	Retain current policies on public transport	The policy on public transport is considered to be fit for purpose, in promoting the connectivity of schemes to the public transport network as set out in *Core Strategy* Policy T3.
B.	Consider the development of a park and ride facility	We have a current policy on the South Essex Rapid Transit (SERT) which was envisaged as a network of priority bus routes to connect Basildon, Southend, Thurrock and London gateway Port, and other key development sites and services (*Core Strategy* Policy T4).
C.	Retain the current policy on travel plans	*Core Strategy* Policy T5 requires new schools, visitor attractions, leisure uses and larger employment schemes to prepare and implement travel plans. Schemes over 50 homes are required to prepare a travel plan.
D.	Lower the threshold to require travel plans to be prepared for schemes under 50 homes	Only schemes over 50 homes are required to prepare a travel plan within *Core Strategy* Policy T5. If we consider smaller sites to deliver new homes as part of our housing delivery strategy in the future, this could have a cumulative impact. The *NPPF* requires schemes which would generate significant amounts of movement to prepare a plan; our policy could be applied to more schemes, which cumulatively could have an impact.
E.	Retain the current policy on walking and cycling	Our current policy on walking and cycling is considered to be fit for purpose in promoting these alternative modes of travel within schemes (*Core Strategy* Policy T6). Studies have been and will continue to be developed to explore the potential for new routes within the constraints of the existing highway network. We will continue to work closely with Essex County Council on the development of the *Rochford Cycling Action Plan*. The policy made need minor amendments as this plan progresses.
F.	Do not have policies on sustainable travel	This approach would involve not supporting improvements to public transport, walking or cycling in policy – particularly the more rural east, and would be contrary to the *NPPF*.

Table 19 shows the six options which have been identified for sustainable travel; a key issue for the District due to the high levels of car ownership, and limited access to public transport in a number of areas. Access to sustainable transport varies significantly across the District, with the west having good transport links to London. Options B-E propose actions which would encourage the use of more sustainable transport modes and reduce reliance on the private vehicle, supporting schemes such as Park and Ride, and the development of the Rochford Cycling Action Plan.

Options B-E are not mutually exclusive and the Council should consider a combined approach to support the aspirations of the Plan. For example, Option C alone would not sufficiently address the scale of growth and potential resulting pressure on the transport network that is predicted. As such, the Council should support an option which facilitates a variety of approaches to sustainable travel. This would have significant positive effects for transport and traffic and indirect positive effects for climate change, air, human health and population.

Table 20: Communications infrastructure options

	Option	Justification as presented in the Issues and Options document
A.	Retain the existing policy on telecommunications infrastructure	The existing policy is considered to be generally fit for purpose, and provides a sufficient basis for the determination of a planning application relating to telecommunications infrastructure. However the existing policy does not take a proactive approach to new technologies, and in particular lacks specific reference to broadband infrastructure.
B.	Amend the existing policy to include specific reference to improving broadband and mobile coverage	As stated above, the existing policy is sufficiently comprehensive and detailed providing the necessary guidance to successfully determine a planning application, however it is very passive. The policy could be made more proactive to seek to improve broadband and mobile coverage in areas designated as lacking for the benefit of the local and rural economies and communities. The policy has room to expand in order to introduce a standard for new developments to install fibre-to-the-home (or business) cables during their construction to ensure all new developments are suitably provided for.
C.	Ensure that all commercial and residential developments over a certain threshold are conditioned to deliver appropriate broadband infrastructure	Ensuring that all commercial and residential developments, above a threshold, provide broadband infrastructure would help to ensure that the basic needs of the future occupants of these buildings are met with regards to broadband connectivity. One way to achieve this would be through the use of a condition attached to any relevant planning consent which requires agreement of details relating to the provision of broadband infrastructure as part of, and serving, the approved development.
D.	Do not have a policy on telecommunications infrastructure	We could rely on national policy for guidance on development of telecommunications infrastructure in the District, however a specific local policy strengthens our ability to ensure that any proposed telecommunications infrastructure is sensitive and acceptable, and may help to deliver improvements to the wider telecommunications connectivity of the District.

Transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and human health. SP3 proposes options for managing communications infrastructure, which can reduce the need to travel. Fibre optic broadband can facilitate working from home and remote working, and encourage enterprise and innovation. Of the four options proposed (Table 20, Options A-D), Options B and C should be considered together, as both support policy improvements which would benefit local and rural communities, ensuring new developments are suitably provided for.

3.2.3.2   Flood risk

Table 21: Flood risk options

	Option	Justification as presented in the Issues and Options document
A.	Retain the existing flood risk policy for coastal flooding	*Core Strategy* policy ENV3 aims to resist inappropriate developments in areas at risk of coastal flooding, wherever possible, following the sequential and exceptions test approach. The exception is some brownfield (previously developed) land. This is in line with national policy and is considered to be an appropriate policy position.
B.	Revise Core Strategy policy ENV3	If this policy was revised, the brownfield (previously developed) land exception in flood zone 2 and 3 could be removed. However the approach in policy ENV3 is considered to an appropriate balance in certain circumstances to avoid development on greenfield land elsewhere.
C.	Continue to apply SUDS policies	SUDS are crucial in keeping runoff and discharge rates similar to those that would naturally occur in order to mitigate possible flash flooding events. *Core Strategy* policy ENV4 sets out when schemes would be required to include a SUDS element. This is supplemented by *Development Management Plan* policy DM28 covers which relates to smaller developments. These policies are considered to be fit-for-purpose in managing surface water flood risk from new developments, but could be combined into one succinct policy.
D.	Do not have a policy on flood risk	This is not an appropriate approach and would be contrary to national policy.

With regard to climate change adaptation, **Figure 3** shows fluvial flood risk for the District. There are a number of main rivers draining Rochford District, mainly the tributaries of the Tidal River Roach and the Tidal River Crouch. As a result, a large proportion of the District falls within the Environment Agency's fluvial and tidal flood zones 2 and 3.

SP3 identifies four options (Table 21, Options A-D) in relation to minimising flood risk. Of these four, Options A and C seek to retain existing policies. Option B seeks to revise Core Strategy Policy ENV3 to remove the reference to the development of brownfield (previously developed) land in flood zone 2 and 3. However, the Council recognises that the approach in policy ENV3 is considered to be an appropriate balance in certain circumstances to avoid development on potential Green Belt land elsewhere. Additionally, ENV3 requires development on brownfield land in flood zones 2 and 3 to pass the exception test and be able to accommodate the necessary flood defence infrastructure, mitigating any potential adverse impacts. As such, it is recommended that a combination of Options A and C be progressed to help manage and reduce flood risk.

3.2.3.3   Renewable energy

Table 22: Renewable energy options

	Option	Justification as presented in the Issues and Options document
A.	Retain the current policies on renewable energy	*Core Strategy* policies ENV6, ENV 7 and ENV 8 are considered to be fit-for-purpose in addressing proposals for renewable energy generation and should be retained.
B.	Include a specific policy on electric vehicle charging points	As and when the need arises, which could be within the next plan period, our current policy could be amended or a new policy be proposed to manage the introduction of electric vehicle charging points in car parks and other appropriate areas such as new developments.
C.	Do not have a policy on renewable energy	Such an approach is not considered to be appropriate as national policy requires us to consider the impact of renewable energy schemes.

Increasing the amount of energy from renewable and low carbon technologies will help to make sure the UK has a secure energy supply, reduce greenhouse gas emissions to slow down climate change and stimulate investment in new jobs and businesses.[14]

SP3 recognises the contribution renewable energy can make, highlighting three options to support renewable energy provision within the District. There are no plans currently for developing large-scale renewable energy projects in the District; however, the Council will seek to reduce carbon emissions through supporting the development of small-scale renewable energy projects.[15]

Of the options shown in Table 22, Option A seeks to retain existing policy, while Option B is more ambitious, proposing the addition of a specific policy on electric vehicle charging points. The Issues and Options Document states that electric vehicles (EV) are becoming an increasingly common sight throughout the District, and as a result, the means to charge these vehicles away from the home will become ever stronger. Option B takes into consideration EV trend data, and plans positively for the future of the District. It positively addresses climate change mitigation, and is likely to have a significant positive effect on sustainable transport through encouraging the use of EVs. Option A is also considered to have a positive effect on climate change mitigation, encouraging renewable energy generation and infrastructure. It is suggested that a combination of Option A and Option B would best accommodate and encourage renewable energy provision in the District.

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[14] Department for Communities and Local Government (2015) Planning Practice Guidance: Renewable and Low Carbon Energy
[15] Rochford District Council (2014) Local Development Framework Core Strategy

Figure 3: Flood Risk
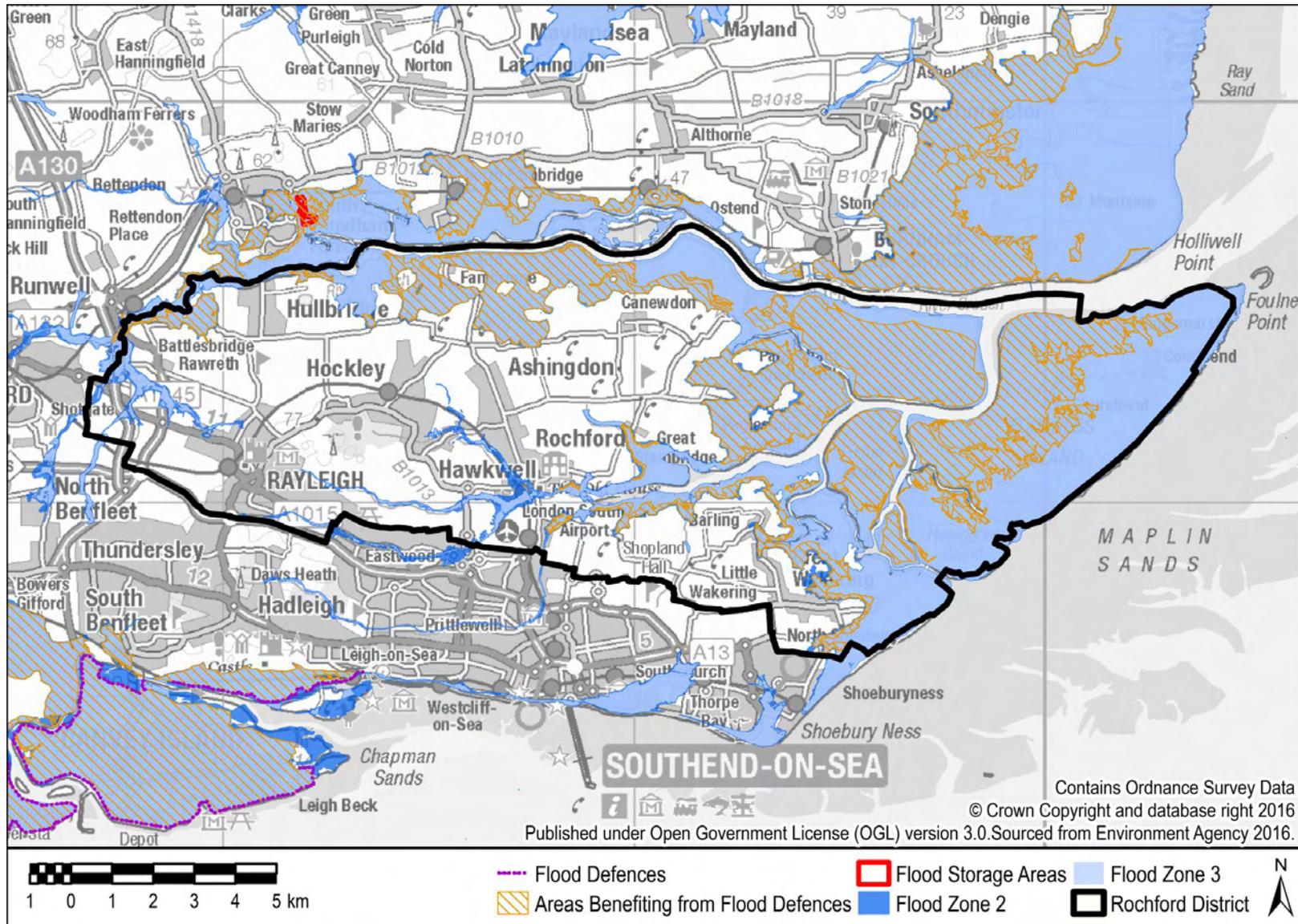
3.2.4 Strategic Priority 4: The provision of health, security, community and cultural infrastructure and other local facilities

3.2.4.1   Community facilities

Table 23: Community facilities options

	Option	Justification as presented in the Issues and Options document
A.	Retain the existing policy	This approach would continue to seek to support community facilities as set out in *Core Strategy* policy CLT6.
B.	Strengthen the provisions with the existing policy	Community facilities can be registered as Assets of Community Value however case law has indicated that this may not necessarily prevent a community facility from being changed to an alternative use. It may therefore be appropriate to include a provision to resist the conversion of community facilities to residential, as this could undermine the sustainability and vibrancy of a community.
C.	Do not have a policy on community facilities	We are required to take a positive approach to community facilities. To not have a policy would be contrary to the *NPPF*.

Table 24: Healthcare options

	Option	Justification as presented in the Issues and Options document
A.	Retain the current policy on healthcare provision	Our current policy in the *Core Strategy* is considered to be appropriate in setting out the broad approach to support future healthcare provision and to work with relevant partners to ensure effective planning for new facilities. The policy could have a minor update to reflect the role of the Castle Point and Rochford CCG. For smaller sites this relies on calculations from the CCG on potential impact of schemes.
B.	Lower the threshold for the requirement to carry out a Health Impact Assessment	The *Housing White Paper* supports smaller sites to deliver new homes, which may mean that such sites are not captured by this policy – and so the cumulative impact would not be effectively considered. The threshold could therefore be lowered to ensure that any development over a certain size – for example 15 homes – would have to assess their impact.
C.	Ensure that land is specifically allocated for healthcare	There is a need to ensure that land set aside for healthcare is specifically allocated for the use, so that this is reflected in the value of the land which would have a positive impact on viability.
D.	Do not have a policy on meeting healthcare needs	This approach would not enable us as the local planning authority to work effectively with the CCG to ensure that there is adequate healthcare provision in the future to meet the needs of local communities. In addition it would not meet the requirements of the Duty to Co-operate or the provisions within the *NPPF*. This is therefore not an appropriate option.

Strong, vibrant communities can help create healthy living environments which should, where possible, encourage physical activity, community engagement and social capital. Rochford District contains a range of community facilities (e.g. village halls, health facilities, post offices, space for recreation), which are most abundant in the larger settlements of Rayleigh, Hockley and Rochford. SP4 identifies three options for community facilities (Table 23), of which Option B is most realistic in the context of the plan. Option B supports appropriate strengthening of community infrastructure given anticipated population growth over the next 20 years. Whilst Option A would continue to support community facilities, Option B looks to include a provision to resist the conversion of community facilities to residential use, positively affecting health and population through the maintenance of existing facilities. Further positive effects could be gained by supporting the provision of new community facilities outside of the key centres. This would improve access across the District, relieve pressure on existing facilities, and reduce health inequalities.

SP4 further discusses healthcare provision; Table 24 sets out the four options identified for delivery throughout the District. Of the four, Options A-C are identified as viable options, with Options B and C performing most positively. Options B and C should be considered in-combination, as both take separate approaches to meeting local healthcare needs: Option B looks to assess impact of development whilst Option C ensures that there is adequate land allocated for healthcare facilities. Rochford has an ageing population and it is recommended that the plan aspires to meet the need of the older population, which is projected to increase in the next 20 years.[16] Supporting older people to have a healthy and active lifestyle can have a positive impact on local healthcare demands and capacity levels. This will result in positive effects on the local economy, human health and population and communities.

3.2.4.2   Education and Skills

Table 25: Education and skills options

	Option	Justification as presented in the Issues and Options document
A.	Retain the current policies on schools provision	The detail of current policies in the *Core Strategy* – specifically policies CLT2 and CLT3 – are considered to be appropriate in setting out the broad approach to facilitating the delivery of new schools, school expansion and financial contributions to deliver improvements. However, some elements of the policies may need updating to reflect planned delivery and future need.
B.	Ensure that land is specifically allocated for schools	There is a need to ensure that land set aside for education is specifically allocated for the use, so that this is reflected in the value of the land which would have a positive impact on viability.
C.	Do not have a policy on meeting education needs	This approach would not enable us as the local planning authority to work effectively with Essex County Council and local schools to ensure that there is adequate school provision in the future to meet the needs of local communities. In addition it would not meet the requirements of the Duty to Co-operate or the provisions within the *NPPF*. This is therefore not an appropriate option.
D.	Update the current employment growth policy on skills and continue to support skills development through a skills training academy	Our current policy (*Core Strategy* policy ED1) supports the development of a skills training academy to enhance the skills base within the District and match local skills with locally available employment opportunities. There is mismatch is coupled with a shortage of specific skills within our District. Whilst the delivery of a skills training academy is still an aspiration, deliverability may be an issue. In the interim, up-skilling of our workforce is important and through promoting apprenticeships and working with local businesses this could be supported through the plan-making process and working with local colleges to address identified skills gaps arising in the future.
E.	Promote apprenticeships through planning	Similar to proposals within neighbouring authorities, we could consider conditioning approved applications for new, extension to or the replacement of employment provisions to require businesses to work with us and our partners to offer apprenticeships and further education training to residents.

Table 26: Early years and childcare facilities options

	Option	Justification as presented in the Issues and Options document
A.	Retain the current policies on schools, early years and childcare	The detail of current policies in the *Core Strategy* – specifically policies CLT2 and CLT3 – are considered to be appropriate in setting out the broad approach to facilitating the delivery of new schools, early years and childcare facilities, school expansion and financial contributions to deliver improvements. However, some elements of the policies may need updating to reflect planned delivery and future need.
B.	Ensure that land is specifically allocated for schools, early years and childcare	There is a need to ensure that land set aside for education is specifically allocated for the use, so that this is reflected in the value of the land which would have a positive impact on viability.

[16] South Essex SHMA

	Option	Justification as presented in the Issues and Options document
C.	Do not have a policy on early years and childcare facilities	This approach would not enable us as the local planning authority to work effectively with Essex County Council and local schools to ensure that there is adequate school provision in the future to meet the needs of local communities. In addition it would not meet the requirements of the Duty to Co-operate or the provisions within the *NPPF*. This is therefore not an appropriate option.

Table 25 lists the five options that have been identified to plan for education and skill development in Rochford. There has been significant increase in school pupils since 2011[17], a trend that is likely to increase, and is raising concern within local communities about the future capacity of schools. Option B positively addresses this, seeking to ensure that there is land specifically allocated for schools. In this context, the Council have been working closely with Essex County Council to deliver improvements to education provision up to 2025.

Option C does not perform well as it is clear that a policy on schools provision is needed to direct and co-ordinate future development. In terms of Option A, while policies CLT2 and CLT3 are supported, the option should arguably be revised to '*update and* retain current policies'. This would allow for an informed approach to school provision /improvements in the District, considering planned delivery and future needs. As stated in the Issues & Options document (2017), widening the choice in education and taking a positive, proactive and collaborative approach to meeting future need is supported by national policy.

Options D and E are distinct from Options A-C, considering how to support the skilled workforce in the District through training academies and apprenticeships, rather than schools provision. Options D and E should be considered in combination, as they both contribute towards developing a continual supply of skilled young workforce. Access to all forms of skills training and education can improve the health and well-being of communities through providing greater choice to access employment opportunities. As such, promoting both Options D and E would support a range of skill development to bridge the skills gap in the District and promote long-term economic prosperity. Overall, a combined approach of Options C, D, E and possibly A (if updated) is preferred.

SP4 further discusses options for childcare facilities (Table 26), highlighting that Essex County Council is responsible for meeting certain statutory responsibilities relating to the provision of early years and childcare services within the District. While Essex County Council's Early Years and Childcare service are beginning to develop new facilities in the hotspot areas where there is likely to be a shortfall, data still demonstrates a deficit of places in specific wards. These wards include Rayleigh Centre, Foulness and Great Wakering, and Hullbridge. Considering the extended Government funding implemented in September 2017, and therefore the likely increase in shortfall of places, Option 2 is supported. Ensuring that land set aside for education is specifically allocated for the use will have positive effects on viability and deliverability, reducing deprivation in key locations. Option A is considered to be broadly appropriate in terms of setting out the approach for childcare and early years facilities, however updates to policy would be helpful in responding to the future needs of residents. For example, where family hub delivery sites are at capacity, additional services can be planned and provision delivered. Option C is not seen to be viable, and would not meet the requirements of the Duty to Co-operate or the provisions within the *NPPF.*

3.2.4.3   Open space and recreation

Table 27: Open space and outdoor sports and recreation options

	Option	Justification as presented in the Issues and Options document
A.	Retain, and where necessary update, the existing overarching policy on open spaces	*Core Strategy* policy CLT5 provides our broad approach to the protection of existing, and requirements for new, public open space across the District. It is considered to be fit for purpose but would benefit from updating where necessary.
B.	Retain, and where necessary update, our	*Allocations Plan* policy OSL1 allocates all of the areas which are currently identified and are in use. This may need to be updated for

[17] Rochford District Council (2017) New Local Plan: Issues & Options document Accessed Oct 2017

	Option	Justification as presented in the Issues and Options document
	current policy on existing open space	example if new open spaces are identified through a strategic review of our *Open Spaces Study 2009* and *Playing Pitch Strategy 2012*.
C.	Retain, and where necessary update, our current policy on new open space	*Allocations Plan* policy OSL2 identifies the strategic locations where it is expected that new open space would be provided as part of schemes. This may need to be updated as the new Local Plan progress, and taking into consideration a strategic review of our *Open Spaces Study 2009* and *Playing Pitch Strategy 2012*.
D.	Retain, and where necessary update, our current policies	*Core Strategy* policy CLT10 sets out the broad approach to the provision of playing pitches. *Development Management Plan* policy DM16 provides detailed criteria for locating playing pitches. This policy is considered to be fit for purpose but would benefit from minor updates in relation to landscape character, following a review of our evidence, where necessary.

National policy recognises that access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Recreation and open spaces within the District include:[18]

- Over 30 football pitches

- 27 play spaces for children

- Sweyne Park, Rayleigh – offering children's play space, a wildlife area with environmental ponds and 2km bridle path over 57 acres

- Hockley Woods – ancient semi-natural woodland designated as a Site of Special Scientific Interest (SSSI) and Local Nature Reserve (LNR) covers an area of almost 300 acres, offering parking, toilets, picnic area, play space, marked trails and a permissive horse route

- Cherry Orchard Jubilee Country Park, south of Hawkwell – a 100 acre country park with woodlands, a lake, bridleways, flower meadows and way marked walks

- The Rayleigh Windmill Museum and heritage resource centre

- Cinemas and community centres generally within settlements

- Three golf courses - Ballards Gore, Rochford Hundred and The Rayleigh Club

- Marinas include the Essex Marina on Wallasea Island and Sutton Wharf just south east of Rochford town centre

Whilst there is an abundance of recreation and open spaces facilities within the District, these are unevenly distributed (**Figure 4**). SP4 addresses the demand on open space and opportunities for new recreational provision in the District. Options are discussed regarding open space and outdoor sports and recreation, indoor sports and leisure centres, facilities for young people, and play space facilities. Open space is an important resource for local communities, with many areas providing a multi-functional use; for example walking and cycling, informal play and formal sports such as football and cricket. All options identified for open space and outdoor sports and recreation (Table 27) look to retain, and where necessary, update existing policies. This is predicted to have positive effects on a variety of SA topics including health and wellbeing, biodiversity, climate change, and population and communities. Any updates to policies should be ambitious, considering the level of need identified during the plan period and the pressure this will place on open spaces in the District. Policy updates should also bear in mind the current uneven distribution of open space facilities within the District and the extent of potential benefits to be delivered.

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[18] Rochford District Council (2015) Environmental Capacity Study [online] available at:
http://www.rochford.gov.uk/planning/policy/new-local-plan/new-local-plan-evidence-base Accessed November 2016.

Table 28: Indoor sports and leisure centre options

	Option	Justification as presented in the Issues and Options document
D.	Retain the existing policy	This approach would continue to seek to deliver the ambitions of *Core Strategy* policy CLT9 to preserve and enhance existing facilities, and to make the best use of other underutilised facilities by encouraging those, such as within school premises, to be made accessible to all.
E.	Do not have a policy on indoor sports and leisure centres	To not have a policy would weaken our ability to preserve and enhance our indoor sports and leisure facilities, and would be inconsistent with national policy which seeks to protect existing built facilities for sport and leisure use.

Table 29: Facilities for younger people options

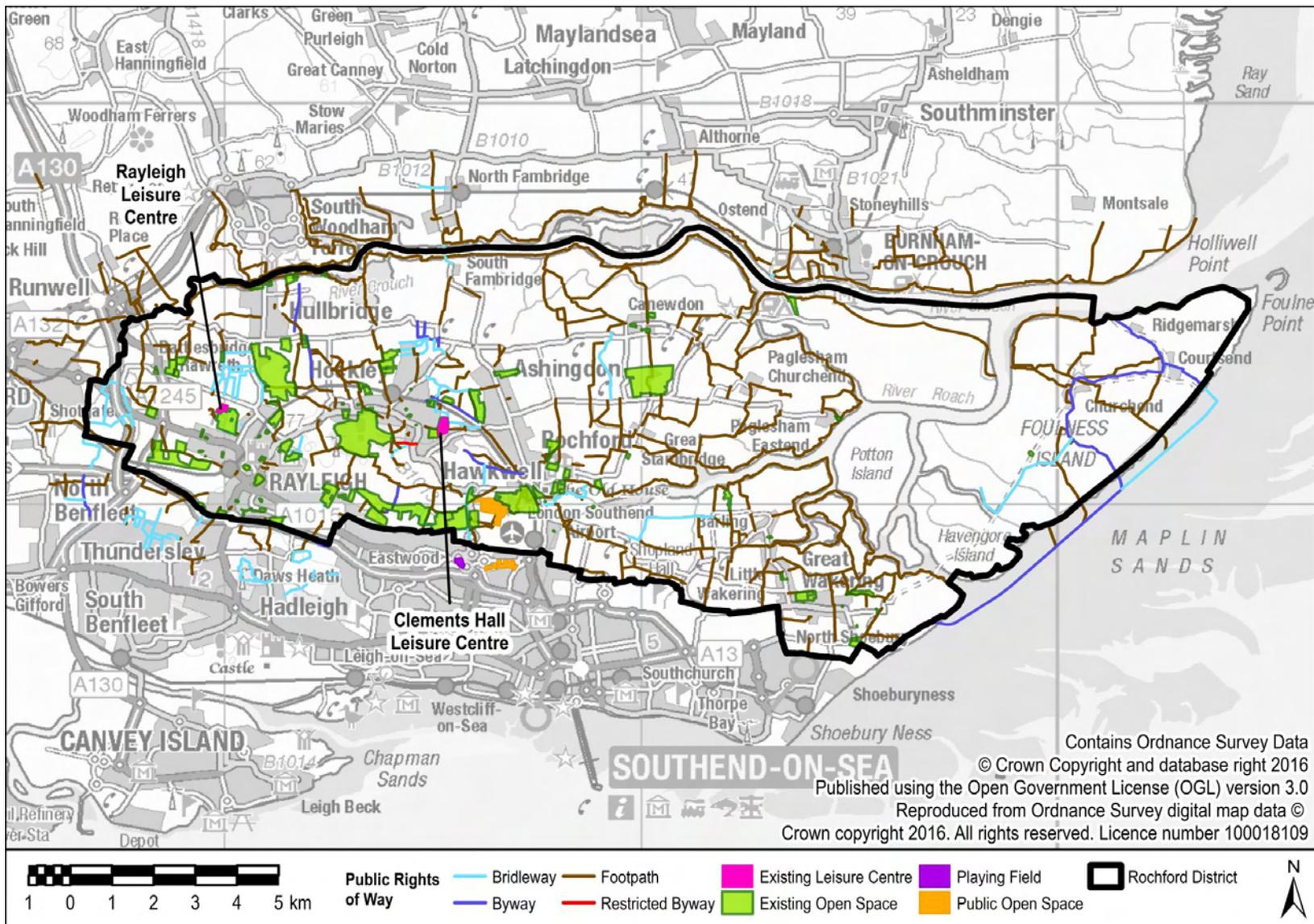|	Option	Justification as presented in the Issues and Options document
A.	Retain the existing policy	*Core Strategy* policy CLT8 identifies the requirement to provide age appropriate youth facilities where need is identified, in an accessible location. This covers all the aspects needed for such a policy.
B.	Do not have a policy on youth facilities	Having no specific policy on youth facilities weakens our ability to provide additional facilities for young people in the District.

Table 30: Play space facilities options

	Option	Justification as presented in the Issues and Options document
A.	Retain the existing policy	*Core Strategy* policy CLT7 is reasonable in its requirements to incorporate communal play space within new housing schemes. Associated charges, maintenance and protection of play spaces are also considered to be addressed by the policy, comprehensively covering all aspects of delivering and maintaining adequate safe play space.
B.	Do not have a policy on play space	This is not seen as an appropriate option. Accessibility to play space is vital to the quality of life of local residents and is proven to improve health amongst the population, as well as fostering a sense of community. As such, play space comprises a crucial role in the make up of new residential schemes.

A similar approach to that taken for open space is taken for indoor sports and leisure centres, facilities for young people, and play space facilities. (Tables 28-30). Whereas Option B is not reasonable, Option A seeks to retain existing policy, which performs positively for a variety of social and environmental SA topics. The delivery of existing fit-for-purpose policy should help to maintain and enhance the District's sport and leisure resources, having a positive effect on human health and wellbeing. This is expected to help maintain the 'very good' health,[19] of almost half of the District (47.8%), which is above the comparative averages.

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[19] ONS (2011) Census 2011, General Health (QS302EW)

Figure 4: Open space & recreation

3.2.5 Strategic Priority 5: Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape

3.2.5.1 Green Belt

Table 31: Green belt options

	Option	Justification as presented in the Issues and Options document
A.	Retain the existing policy on broad Green Belt principles in the *Core Strategy*	The broad policy on Green Belt – policy GB1 in the *Core Strategy* – is considered to be appropriate in seeking to direct development away from the Green Belt as far as possible.
B.	Amend the current Green Belt policy in the *Core Strategy*	The policy may need to be updated to reflect our strategy for delivering new homes and jobs over the next 20 years. In particular, this is likely to be influenced by the new national methodology for assessing the need for new homes. An assessment of the Green Belt as a whole would also need to be taken into consideration.
C.	Do not have a policy on the Green Belt.	This is not considered an appropriate position – there is a need to protect the Green Belt wherever possible.

The Green Belt within Rochford District forms part of the Metropolitan Green Belt, which extends eastwards across South Essex from London. Most of the District's open countryside - 12,763 hectares - is designated as Metropolitan Green Belt; the only exception to this is Foulness Island, which is Ministry of Defence land (see **Figure 5**). The government attaches great importance to Green Belts; the fundamental aim of the Green Belt policy being to prevent urban sprawl by keeping land permanently open.[20] This helps to protect the identity of settlements and communities within the District. **Figure 4** shows that the majority of the District's land is designated as Green Belt land. The NPPF states that *'Once established, Green Belt boundaries should only be altered in exceptional circumstances'* and, as such, detailed policy concerns are raised for all aspects of Green Belt development, including:

• Replacement, rebuild or extensions of existing Green Belt homes;

• Agricultural, forestry and other occupational homes in the Green Belt;

• Development of previously developed land in the Green Belt; and

• Extension of domestic gardens in the Green Belt.

The Green Belt is therefore a policy designation and does not directly relate to a particular SA topic.

The Green Belt is addressed within the Environmental Capacity Study (2015)[21], which considers the ability of the District to accommodate additional new homes beyond 2025. The study recommends that site-specific studies could be undertaken for small sites around the northern and western urban areas, and that this could include an assessment of the Green Belt in these areas.

Table 31 shows the three options identified in relation to the Green Belt, of which Option B performs most positively against population. Option B would support amendments to the Green Belt policy to reflect the strategy for housing delivery for the next 20 years. This would ensure consistency with the Local Plan strategy, meeting identified requirements for sustainable development. However, Option B could also result in the loss of areas of open space and green infrastructure within the District. This has the potential for long-term negative effects on SA topics including landscape and historic environment, biodiversity, climate change, environmental quality, land and soil resources and health and wellbeing.

It is recognised that a balance would need to be struck between meeting social, economic and environmental needs in relation to the Green Belt. However, the constraints of the District are such that retaining the existing policy under Option A in its entirety may not allow the identified housing needs of the District to be met. Option B may result in development within the Green Belt; however,

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[20] Department for Communities and Local Government (2012) National Planning Policy Framework
[21] Enfusion (2015) Environmental Capacity Study prepared for Rochford District Council

the existing mitigation strategy within policy GB1 may reduce the significance of any negative effects. Option B will allow for a transparent approach in which the Council can make an informed decision, i.e. through an assessment of the Green Belt as a whole. A Green Belt assessment would form part of the evidence base for the Local Plan and will be used to identify the functionality of Green Belt parcels in relation to its five purposes (as set out in the NPPF).[22]

3.2.5.2   Biodiversity and green infrastructure

Table 32: Biodiversity and geodiversity options

	Option	Justification as presented in the Issues and Options document
A.	Retain or amend our current broad policy on sites of nature conservation importance	*Core Strategy* policy ENV1 sets out our commitment to maintaining, restoring and enhancing our sites of nature conservation importance. It could however be strengthened to identify and seek to enhance local wildlife corridors and networks which support the adaptability of wildlife to any change in climate.
B.	Do not have a policy on sites of nature conservation importance	The broad approach set out in *Core Strategy* policy ENV1 is considered to be appropriate in in setting out our commitment to sites of nature conservation importance, and supports more detailed policies on protecting specific habitats.

Table 33: Local habitat options

	Option	Justification as presented in the Issues and Options document
C.	Retain our current policy on trees and woodlands	*Development Management Plan* Policy DM25 on trees and woodland is considered to be fit for purpose in terms of requiring appropriate mitigation for any loss of habitats, their retention and enhancement and the creation of new habitats. This approach is supported by national policy.
D.	Retain our current policy on other important landscape features	*Development Management Plan* Policy DM26 sets out our approach to protecting other important landscape features that have been identified. This policy is considered to be fit for purpose and this approach is supported by national policy.
E.	Retain our current policy on species and habitat protection	*Development Management Plan* Policy DM27 sets out our approach to protecting priority habitats and species. This policy is considered to be fit for purpose and this approach is supported by national policy.
F.	Update our current policy on Local Wildlife Sites	*Allocations Plan* Policy ELA1 will need to be updated to reflect the findings of the latest Local Wildlife Sites assessment; and allocate these sites accordingly.
G.	Condense and merge our current policies on nature conservation	Whilst our current policies are considered to be appropriate; there is potential to strengthen our broad, strategic policy and supplement this with more succinct detailed policies.

The District contains a number of international and national nature conservation designations, including five European designated sites (the Crouch and Roach Estuaries SPA and Ramsar, Foulness SPA and Ramsar and Essex Estuaries SAC) and three SSSIs (Hockley Woods, Foulness and the Crouch and Roach Estuaries).

Locally designated biodiversity sites, including Local Nature Reserves (LNRs) and Local Wildlife Sites (LWSs) are spread across the District. There are notable concentrations of local designations in the southwest, west and central areas of the District, around Hockley, Rayleigh and west of Hawkwell. The largest LWS is the Wallasea Island Managed Realignment which covers 90.3 hectares (ha). **Figure 6** provides further detail.

Tables 32 and 33 list the options identified in relation to sites of nature conservation importance, and local habitats. The viable options are those which retain and/or update existing policies. Options C

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[22] Department for Communities and Local Government (2012) National Planning Policy Framework

and D suggest existing planning policies are fit for purpose, reflecting little change in landscape features, woodland and trees. This is seen to be a reasonable approach, considering the biodiversity and ecological baseline is unlikely to have significantly changed since the adoption of the Core Strategy in 2014.

However, updating existing policies would have further positive effects on biodiversity and health and wellbeing through ensuring that data and assessment findings are up to date and that the plan is aligned with these. Policy updates may also reflect the predicted effects on designated biodiversity sites as a result of the implementation of the new Local Plan. As the options proposed are not mutually exclusive, the delivery of a combination of options A, C, D, E and F is seen to be the most appropriate approach, ensuring the safeguarding of biodiversity assets across the District. The new Local Plan should seek opportunities for enhancement where possible and seek to maintain and improve ecological corridors both within District and to surrounding areas.

Table 34: Greenways options

	Option	Justification as presented in the Issues and Options document
H.	Retain our current policy on greenways	*Core Strategy* Policy T7 sets out our approach to greenways, which are important walking and cycling corridors which promote biodiversity and connectivity of habitats. No strategic greenways have been developed in the District to date, however we are committed to reviewing the appropriateness of these greenways, set out in the *Green Grid Strategy* and promoting their delivery.
I.	Do not have a policy on greenways	Ensuring the connectivity of habitats as a response to climate change pressures, and facilitating a network of green open spaces and greenways to promote health and well-being, are national policy considerations. To not have a policy on greenways would not be an appropriate approach.

Table 35: Wallasea Island and the RSPB's Wild Coast Project options

	Option	Justification as presented in the Issues and Options document
A.	Retain the current policy which supports the Wallasea Island Wild Coast Project	This policy in the *Core Strategy* supports the RSPB's project, including promoting recreational use, additional marina facilities and access improvements. It would also support the development of sustainable access such as cycle routes to the Island to connect homes, jobs and this key leisure destination.
B.	Continue to support further development at Essex Marina as per current policy	Essex Marina is identified, alongside Baltic Wharf, as a major developed site in the Green Belt in the *Core Strategy* and *Allocations Plan*. This area may be able to support further development, provided that any adverse ecological impacts are avoided or mitigated, as set out in the *Core Strategy.*
C.	Do not support further development at Essex Marina	Essex Marina, alongside Baltic Wharf, provides rural employment opportunities in the District. Although Essex Marina by its nature requires a coastal location, any detrimental impact on the environment should be avoided or mitigated. Applications should be considered on a case-by-case basis.

SP5 also supports the RSPB's development of Wallasea Island as an important nature conservation project and visitor destination for the future. The project is the largest coastal managed retreat project in Europe, which Options A and B (Table 31), seek to continue to support under existing policy. This will have positive effects on biodiversity, landscape, human health as well as the economy through developing leisure and tourism opportunities.

The green infrastructure (GI) network is also of great value across the District. River corridors and green open spaces make a significant contribution to this, with key GI being found in the Upper Roach Valley, including dedicated bridleways, Ancient Woodland and marked walking routes.[23] Table 32 shows the two options proposed for greenways, which are to retain existing policy (Option H) or to not have any policy (Option I). Option H performs better against the SA topics as it supports the management and provision of greenways. The new Local Plan should continue to protect and seek the provision of greenways along with encouraging their multifunctional use. GI provides benefits

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[23] Environmental Capacity Study (2015)

across a range of SA topics including biodiversity, climate change, environmental quality, human health and population and communities.

3.2.5.3   Landscape character

Table 36: Landscape character options

	Option	Justification as presented in the Issues and Options document
A.	Retain the current policies on the Upper Roach Valley	Our *Core Strategy* (policy URV1 and ELA3) are considered to be appropriate and in line with national policy, however the extent of the Upper Roach Valley may be reviewed as part of a local level landscape character assessment.
B.	Retain the current policies on the Coastal Protection Belt	Our *Core Strategy* (policy ENV2 and ELA2) are considered to be appropriate and in line with national policy. However the extent of the Coastal Protection Belt will reviewed as part of a local level landscape character assessment.
C.	Develop a broad policy on landscape character	This policy would consider the varied landscapes across the District, and identify any particular sensitivities.
D.	Ensure consistency throughout *Development Management Plan* policies in relation to supporting development in appropriate landscape character areas and special landscapes	A more detailed assessment of landscapes within the District should help to resolve any potential issues of conflict within existing policies.
E.	Do not have a policy on landscape character	The *NPPF* supports the protection of distinctive and valued landscapes, including the undeveloped coast. It would therefore not be appropriate to fail to have a policy addressing landscape character.

Whilst there are no nationally designated landscapes within or in close proximity to the District, the District itself is valued for its local landscape character. The landscape of Rochford District is distinct and varied, comprising three broad landscape character areas (LCAs);

- Crouch and Roach Farmland - extends south from the River Crouch then skirts around Hockley, Rochford and Rayleigh, to the east of Rochford as far south as Great Wakering.

- Dengie and Foulness Coast - covers the far eastern extent of the District, meeting the eastern boundary of Great Wakering.

- South Essex Coastal Towns - encompasses Hockley, Rochford and Rayleigh and the area in between, and Great Wakering.

Protecting the character of the landscape is imperative for the District. The East of England Intrusion Map[24] demonstrates how the east of the District is largely formed of undisturbed and tranquil areas. The west contains the built-up parts of the District, which includes many areas disturbed by noise and visual intrusion, particularly to the south west around Rayleigh and boundaries with Castle Point and Southend Boroughs.

There are a range of nationally designated heritage assets within the District, including six Scheduled Ancient Monuments (SAMs), ten Conservation Areas, and many Listed Buildings. There are also more than 350 sites of archaeological interest recorded on the Heritage Conservation Register (HCR) in the District. SP5 refers to the Environmental Capacity Study 2015, which considers landscape character, historic environment and key recreational areas together to determine potential sensitivity. The areas comprising the Upper Roach Valley and Dengie and Foulness Coast are considered to have the highest sensitivity.

Given the presence of a significant number of designated heritage assets, important views and buildings of townscape merit, SP5 identifies a range of options for landscape character (Table 36). Four of the five options put forward (Options A-D) are deliverable, and should be considered in-

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[24] CPRE (2007) East of England Intrusion Map [online] available at: http://www.cpre.org.uk/resources/countryside/tranquil-places/item/1786- Accessed Nov 2016.

combination since they are not mutually exclusive. Options A-D offer positive effects for the landscape/ townscape and the historic environment.

Options A and B seek to retain existing Core Strategy policies as they are deemed fit for purpose, and will be underpinned by a local level landscape character assessment. Option C considers a broad brush approach to landscape character, considering all LCAs in one policy. This may have positive effects through providing an overview of the District's landscape and its sensitivities, and may aid decision making by presenting information within one policy. However, Option C may also result in loss of detail provided in Options A and B, considering the complexities and variabilities between the District's three LCAs.

Option D seeks to address the conflict between the direction of policies in the adopted Development Management Plan, such as the support for development schemes within the South Essex Towns Landscape Character Area, which is rural in nature and valued by local residents. Option D recognises that additional evidence on local landscape character would have positive effects for a number of environmental and social SA topics, contributing towards ensuring development is promoted in appropriate locations. Consideration should be given to the extent of the impact new development may have on the landscape's character and quality; this includes from the loss of landscape features as well as visual impact. A combination of options would maximise sustainability performance for the new Local Plan.

Table 37: Heritage and culture options

	Option	Justification as presented in the Issues and Options document
A.	Retain the existing policies	*Core Strategy* policies CP1, CP2 and CP3 are considered to be appropriate and fit for purpose in seeking to maintain high quality design and preserving the local heritage and culture in the District. The supplementary policies in the *Development Management Plan* (policies DM7 DM8, DM9 and DM23) contribute to this purpose through appropriately managing schemes within sensitive areas. The policies within the *Area Action Plans* for Rayleigh and Rochford, in particular, due to their historic significance are also heavily focussed on protecting the character of these town centres. Locally listed buildings, which do not have statutory protection, are afforded some protection through the planning polices by *Core Strategy* policy CP3 and *Development Management Plan* policy DM7.
B.	Do not have policy or additional guidance relating to culture and heritage	This is not seen as a feasible option. It is vital to protect the culture and heritage of the District, through maintaining good design practises and preserving historically important areas. The policies seek to maintain the character of the District which is steeped in history, which is important not only for the welfare of local people through preserving a quality environment but also the local economy through tourism opportunities.

Table 38: Good design and building efficiency options

	Option	Justification as presented in the Issues and Options document
A.	Retain the existing policies on design	The current design policies are considered to be broadly sufficient in being able to deal with design issues when assessing any schemes. However any changes in national policy or guidance, such as design codes, may need to be considered.
B.	Ensure design policies make specific reference to *Secured by Design*, and the need to strike an appropriate balance between urban design and security	It is important to ensure that any scheme – whilst being appropriately sensitive to the local context – is also suitably secure over the lifetime of the development.
C.	Retain current guidance within our *Supplementary Planning Documents.*	Our current guidance provides broad principles that schemes should follow to ensure that they are appropriately designed, which is considered to be fit for purpose. However this could be further expanded to provide more specific design guidance for each area.
D.	Develop specific design principles for individual towns and villages building on the current guidance within our *Supplementary Planning Documents.*	This would ensure that any new schemes, potentially outside of those covered by the *Area Action Plans* and *Conversation Area Appraisals and Management Plans*, are suitably designed for each area, in consultation with local communities, which have already agreed a design code or framework for schemes.

With regard to the historic environment, Table 37 shows that SP5 has identified just two options; retain existing policies (Option A), and, do not have policy or additional guidance relating to culture and heritage (Option B). Option B is not a viable option considering national planning policy and the extent of heritage assets within the District (see **Figure 7**). It is vital to protect the culture and heritage of the District for its contribution to the local economy and the wider historic environment. Option A suggests existing policies would be fit for purpose and, as such, would provide the necessary maintenance of the Districts' heritage assets, including through ensuring appropriate design and layout.

Landscape character and heritage can also be impacted by development design. SP5 addresses the importance of good building design through four *'design principles'* options (Table 38), of which Options A and C look to retain existing policy and guidance. Options B and D provide specific requirements for design policies and principles, building on guidance within '*Secured by Design'* and other Supplementary Planning Documents (SPDs). Improving design practice would enhance sustainability, protecting the attractiveness of the District's landscape and historic environment. Good design can also extend benefits to other SA topics, including climate change, human health and biodiversity. Given the varied environment and local character of the District, Options B and D are predicted to have the greatest positive effects, tailoring design needs to individual areas. However, as retaining current guidance is also recommended, a combined approach should be explored to maximise safety, attractiveness and prosperity for development locations.

3.2.5.4   Air quality

Table 39: Air quality options

	Option	Justification as presented in the Issues and Options document
A.	Retain the existing policies on air quality	*Core Strategy* policy ENV5 is still considered to be fit for purpose and allows us to restrict schemes for new homes where it would increase exposure to poor air quality or exacerbate existing poor air quality situations. *Development Management Plan* policy DM29 is also still considered to be appropriate in requiring air quality assessments for specific schemes.
B.	Continue to promote clean air initiatives, such as sustainable ways to travel and renewable energy projects	Such proposals, where implemented, may help to improve air quality in that location and reduce the risks associated with exposure to poor air quality. Making use of technological innovations can result in positive contributions to managing air quality.
C.	Support, where appropriate, the actions put forward in the *Rayleigh Town Centre Air Quality Action Plan*	The *Rayleigh Town Centre Air Quality Action Plan* includes specific proposals to combat poor air quality within the designated Rayleigh High Street AQMA. Where these actions require planning permission, or other planning involvement, supporting the implementation of these actions, provided they are considered appropriate, may help to alleviate the poor air quality situation in this area.
D.	Do not have a policy on air quality	Such an approach is not considered to be a realistic option as national policy requires us to consider the impact proposed development has on air quality, and the presence of AQMAs.

Traffic is the primary source of air pollution in the District. In 2015, Rochford District Council declared an Air Quality Management Area in Rayleigh due to exceedances of NO_2 from road traffic. The area extends from the A127 trunk road to and encompassing the Rayleigh Town Centre one way system. Air quality was raised as a concern during community consultation and, as such, SP5 highlights the opportunity for the new Local Plan to affect air quality in a positive way, including through influencing what development is proposed and where, and the encouragement it can give to sustainable transport provision. This is particularly important given the recent publication of Defra's UK Air Quality Plan for tackling nitrogen dioxide, which states that, "*It is for local authorities to develop innovative local plans that will achieve statutory NO_2 limit values within the shortest time possible*".[25]

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[25] Defra (2017) Draft UK Air Quality Plan for tackling nitrogen dioxide. Available [online]:
https://consult.defra.gov.uk/airquality/air-quality-plan-for-tackling-nitrogen-dioxide/

Table 39 shows the four options that have been identified in relation to air quality, of which Options, A, B and C should be considered in-combination if the plan is to have significant positive effect. Retaining existing policies, promoting clean air initiatives, and supporting the actions put forward in the Rayleigh Town Centre Air Quality Action Plan are all positive measures which should be taken to mitigate any adverse impacts proposals may have on air quality in the District. Air quality is significant issue in the District and nationally, and as such the plan should be far reaching in its approach to tackling the problem. Consideration should be given for residents living within low air quality areas, and the potential harm which may be triggered as a result of development. Improving air quality could have positive effects for SA topics such as climate change, human health, population and communities and environmental quality.
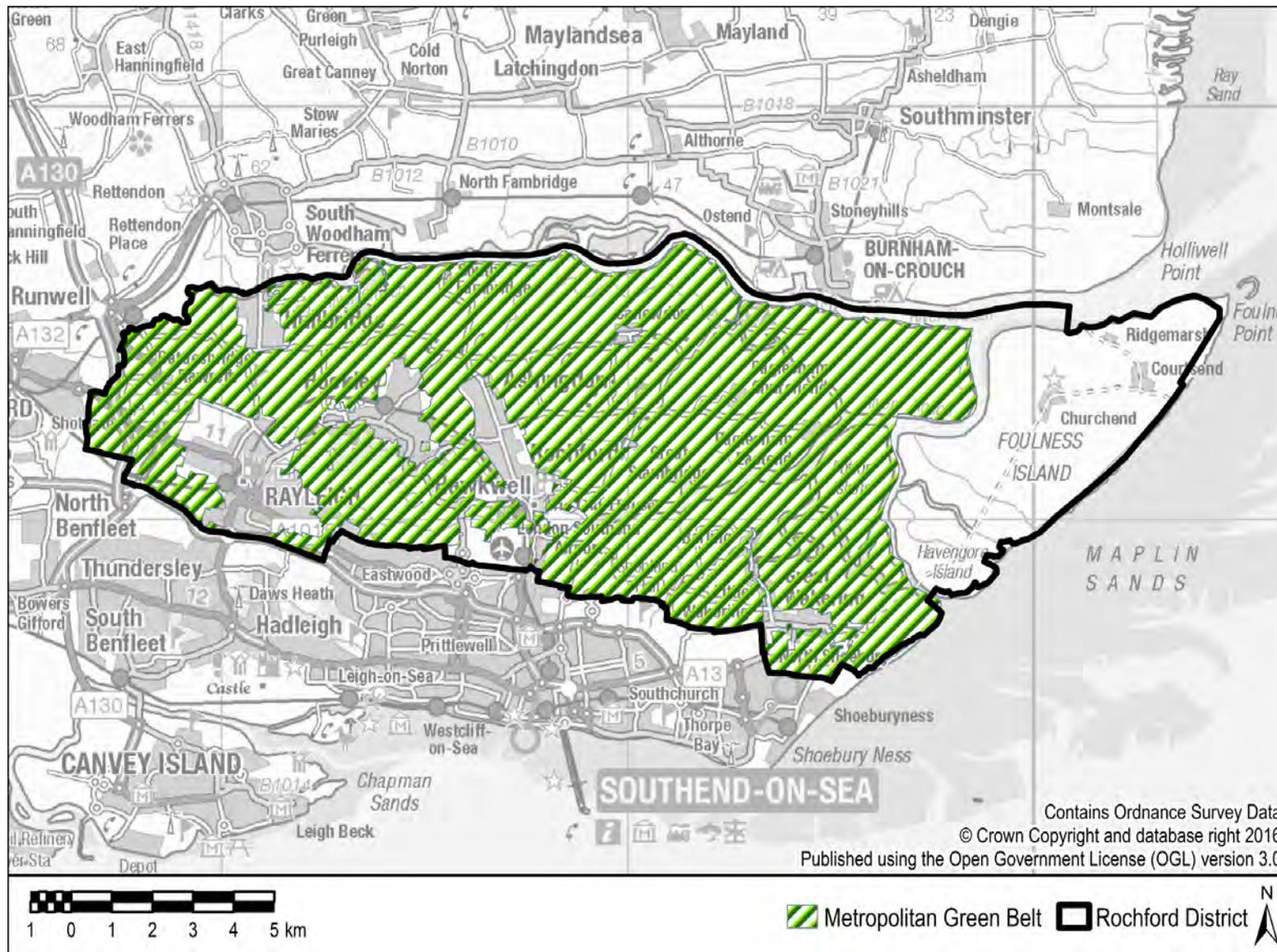
Figure5: Green Belt

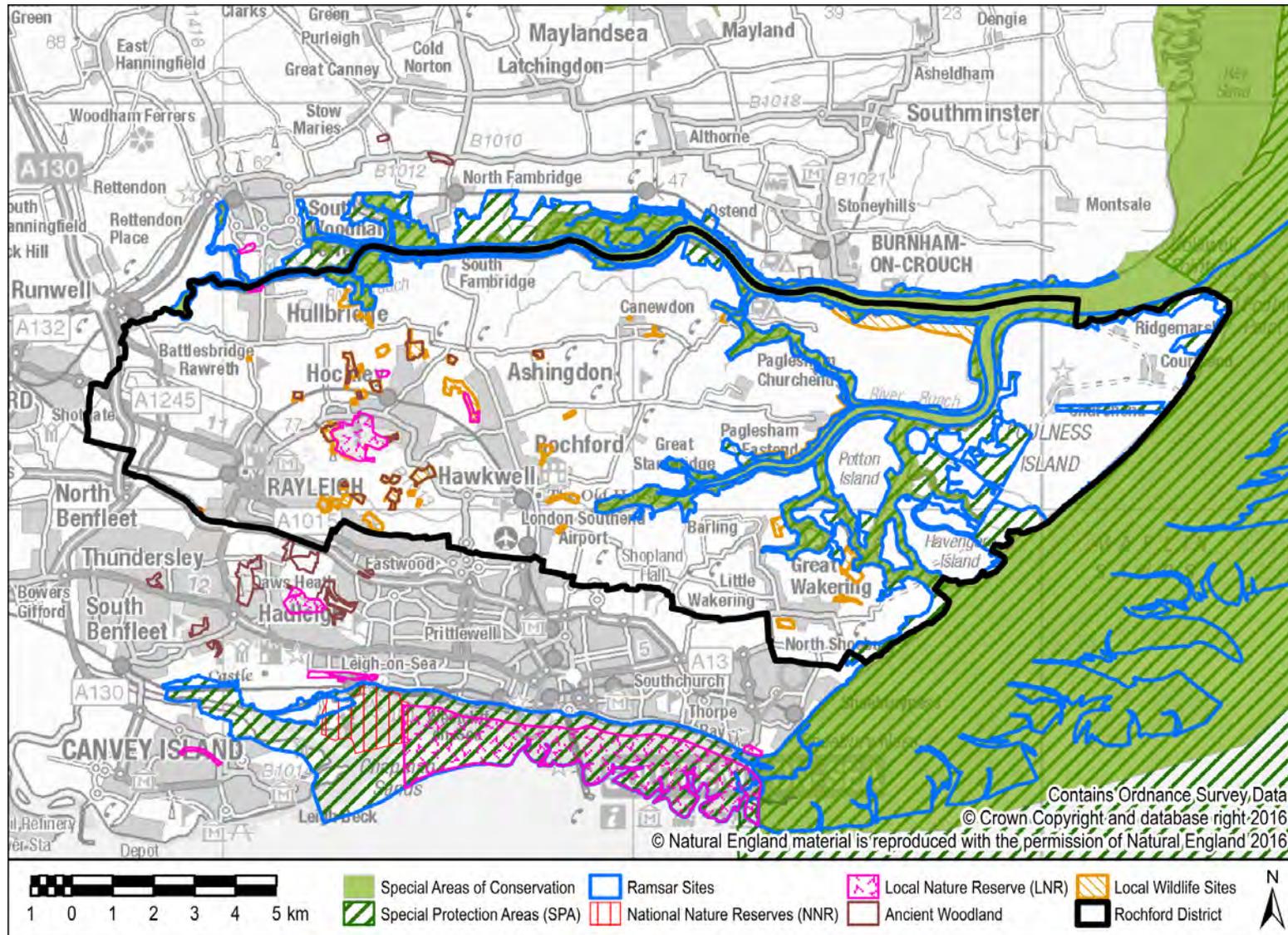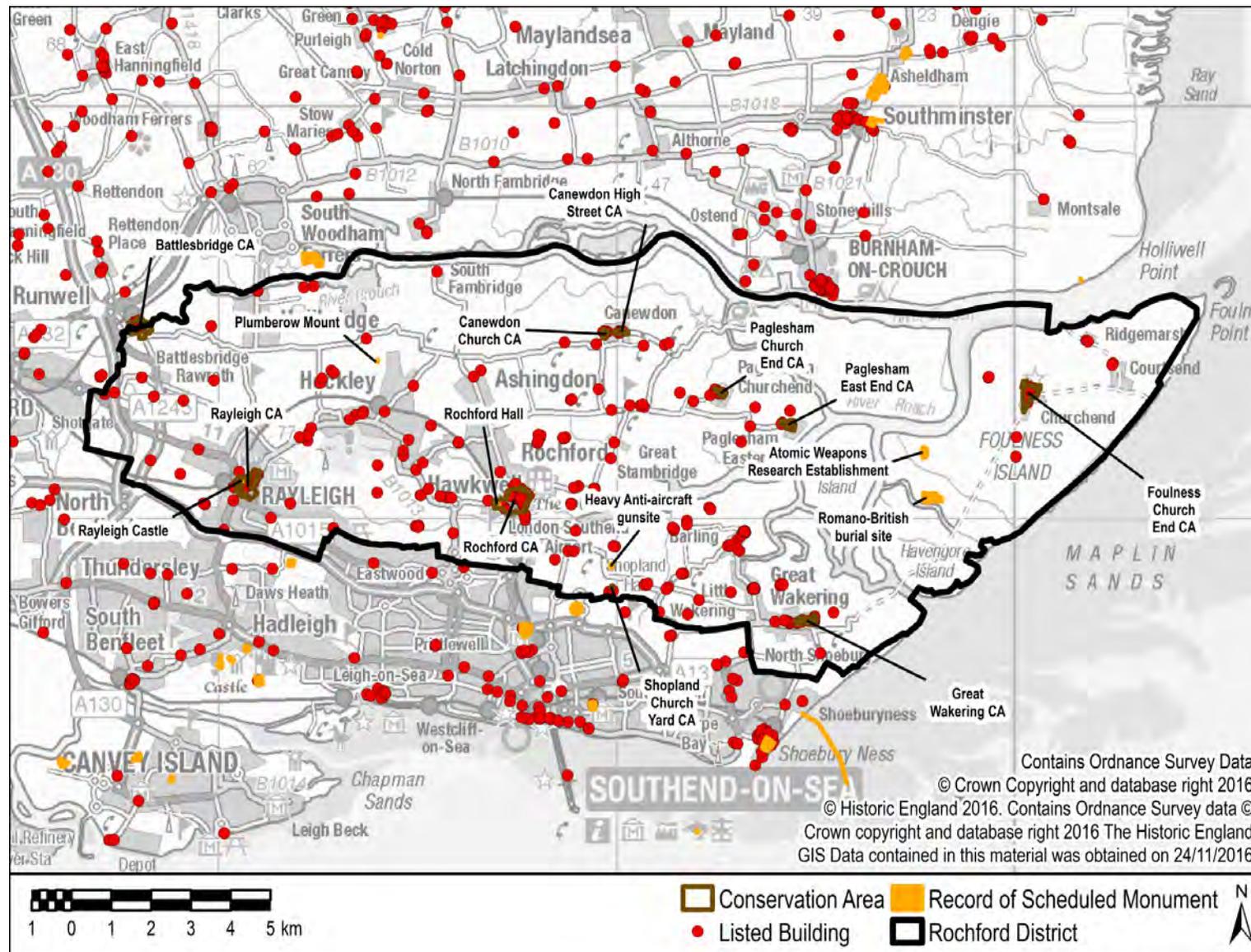**Figure 6: Biodiversity Designations**

Figure 7: Historic environment

3.2.6   Detailed Policy Considerations

As part of the review of existing local plan policies and emerging evidence, the Council has identified potential issues and opportunities relating to non-strategic policies.

3.2.6.1   Housing

Table 40: Mix of affordable homes Options

	Option	Justification as presented in the Issues and Options document
A.	Retain the current affordable homes split (80% social and 20% intermediate) where a scheme meets the prescribed threshold	This current policy requirement has delivered 232 affordable homes over the last five years. It particularly provides for those households most in need on our Housing Waiting List.
B.	Amend the split taking into account any changes in national planning policy and guidance (if the definition of affordable homes is widened to include other products)	There is some uncertainty about the direction of national policy and guidance in relation to the definition of affordable homes. This may reduce the number of homes available for those on our Housing Waiting List. However, the mix could favour affordable rent, for example 10% starter homes; 70% affordable rent; 15% shared ownership and 5% affordable private rented, depending on the outcome of the *Housing White Paper* and local viability testing.
C.	Do not have a prescribed split in a policy	This would increase the flexibility of a policy; and would enable any schemes to meet affordable homes need at the time an application is submitted. However, it would provide less certainty for developers and could mean that there is no guarantee that enough social products are delivered to meet the needs of those on our Housing Waiting List.

Detailed policy consideration is given for a number of housing issues, with focus placed on meeting the needs of the Districts' residents over the next 20 years. Concerns are highlighted with regard to changes to the definition of affordable housing as suggested in the Housing White Paper (2016). The Council recognises that, as the body responsible for local housing matters, options must be put forward to ensure that the needs of residents continue to be met wherever possible. In this context Option B in Table 40 is the only feasible option for addressing the split between affordable housing products (the split between intermediate and social housing products).

Table 41: Rural exception sites options

	Option	Justification as presented in the Issues and Options document
A.	Introduce a specific policy on rural exception sites to promote the delivery of affordable homes only in rural areas (under 3,000 existing homes), subject to viability	Any schemes within a rural exception site will need to be led by a Registered Provider; the affordable homes would be affordable in perpetuity (however affordability is defined). There could be viability issues on some sites, which would impact on their ability to meet local needs. National policy recommends considering the inclusion of market homes to deliver more affordable.
B.	Introduce a specific policy on rural exception sites to promote the delivery of affordable homes in rural areas (under 3,000 existing homes), with an element of market homes to improve overall viability	Any schemes within a rural exception site will need to be led by a Registered Provider, and solely enable the delivery of affordable homes with no element of profit including no additional uplift in land values. This would need to be made explicitly clear within any wider housing delivery policy. Supporting an element of market housing improves viability, and delivers a mix of homes in line with national policy. However it must be made clear that the subsidiary element of market homes is purely enabling development.
C.	Include rural exception sites into a wider housing delivery policy (careful with blanket policy), accepting that a limited amount of market homes can be delivered to support a greater	Any schemes within a rural exception site will need to be led by a Registered Provider, and solely enable the delivery of affordable homes with no element of profit including no additional uplift in land values. 7)This would need to be made explicitly clear within any wider housing delivery policy. Supporting an element of market housing improves viability, and delivers a mix of homes in line with national policy.

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Option	Justification as presented in the Issues and Options document
amount of affordable homes	However it must be made clear that the subsidiary element of market homes is purely enabling development.
D. The split between the different affordable homes products reflects the overall policy for affordable homes across the District.	This would ensure that there is consistency in the provision of a wide range of affordable homes products that meet the needs of the District's population.
E. A flexible approach to the split between the different affordable homes products so that it is timely and reflects the needs of rural settlements at a time when a scheme is being proposed.	This would ensure that the requirement for different affordable homes products meets the specific needs of a rural settlement when a scheme is being proposed.
F. Any policies on rural exception sites is prescriptive on their size and location to ensure that they reflect the size and function of the nearest rural community	Any schemes will need to reflect the size and function of the rural settlement so that they respect the rural character of an area. Taking a prescriptive approach on the size and location of any rural exception sites would provide certainty for local community.
G. Any policies on rural exception sites is flexible on their size and location to ensure that they reflect the size and function of the nearest rural community	Any schemes will need to reflect the size and function of the rural settlement so that they respect the rural character of an area. Taking a more flexible approach on the size and location of any rural exception sites would enable schemes to be determined on their individual merits as they are proposed. However this could potentially mean ad-hoc schemes being proposed in the Green Belt.
H. Do not have a rural exceptions site policy	The *NPPF* requires us to be responsive to local circumstances and plan to reflect local housing needs, particularly for affordable homes, including through rural exception sites where appropriate.

The Council recognises that rural exception sites are an important policy tool to deliver affordable homes within smaller settlements across the District and can help to maintain the sustainability of rural communities. As such, Table 41 shows the eight options that have been identified relating to the approach to delivering rural exception sites. Of these, Option A promotes the delivery of affordable homes only and while this may be the best option for meeting the affordable housing need in the area, there are viability issues. As such, Options B and C look to introduce/merge policies which include some market homes with affordable homes, as a more realistic approach for delivery. It is stressed that the subsidiary element of market homes within these options is purely enabling development. Options D and E approach the split between the different affordable homes products across the District. Option E performs most positively, addressing the needs of rural settlements at a time when a scheme is being proposed rather than having a consistent District wide approach which does not reflect the variability in the settlements' needs. Option G also takes into consideration the functionality of settlements, requiring development schemes to reflect and respect the rural character of an area. As such, a combination of Options B, C, E and G is recommended for delivering rural exception sites in the District.

Table 42: Self-build and custom build homes options

Option	Justification as presented in the Issues and Options document
A. Require a proportion of self-build and/or custom-build plots to be provided on private market allocated or windfall schemes over a certain size (alongside other types of homes needed) based on the level of local demand. For example, a minimum of one plot per 0.5 hectare to be set aside for these types of homes.	This approach would involve a portion of a private developer's site being reserved for self-builds or custom-builds. There may be implications for private developers in terms of viability, however this would provide greater certainty that a number of self-build or custom-build plots would be made available for purchase, and delivery. The actual threshold for provision of plots could be determined by the level of demand within different locations across the District.
B. Utilise the Council's assets, wherever	We do not currently own, manage or deliver homes, and there are

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	Option	Justification as presented in the Issues and Options document
	possible, or acquire land to allocate plots for the purpose of self-build and/or custom-build, and help match people on the register to the plots.	limited assets and resources available to do this. There is also a financial risk involved which needs to be carefully considered.
C.	Allocate individual plots in the Green Belt for self-build, where those on the Register have identified that they own the land, and this will be their sole or main residence.	Whilst this approach can provide plots for those with ready-access to land, it has the potential to lead to sporadic development in the countryside, contrary to the five purposes of the Green Belt. Such an approach could create further pressure which could have an erosive impact on the Green Belt.
D.	Do not have a policy on self-build or custom-build plots.	This approach is not considered to be appropriate, as the Government requires us to facilitate the delivery of self-build or custom-build plots.

Table 43: Annexes, outbuildings and independent homes options

	Option	Justification as presented in the Issues and Options document
A.	Develop a policy which sets out clear criteria for annexes and outbuildings (or similar)	We could take a positive approach to the treatment of annexes and outbuildings (or similar) where it can be clearly demonstrated that the dwelling would be dependent on the main home. Such dwellings could be conditioned to require their occupation to remain ancillary to the main home. It would also be useful to include guidance on such development in the Green Belt.
B.	Do not have a policy on this – continue to reply on case law	Case law has provided clearer guidance on how applications for separate annexes or outbuildings (or similar) should be treated in relation to the threshold for a 'dependence' test on the main home.

Table 44: Basements Options

	Option	Justification as presented in the Issues and Options document
A.	Extend the current policy on basements in the Green Belt	This would limit basements in the residential area to the same extent as those in the Green Belt; including in size and its use as a dependent part of the above ground building. Within the residential area, this policy could also take into consideration the impact on the historic environment (such as Conservation Areas, Listed Buildings and locally listed properties).
B.	Do not have a policy on basements in the existing residential area	There has not been a significant increase in the number of applications for basements. The justification for such a policy would need to be clearly evidenced. It is still considered to be appropriate to have a policy on basements in the Green Belt however.

Tables 42-44 show that options for self-build and custom built homes, annexes, outbuildings and independent homes, and basements are largely either proposing to retain or update existing policies. Updating policies is the preferred option as this would take into account any recent changes in baseline data, key issues, and government policy changes. For annexes, outbuildings and independent homes for example (Table 43), Option A looks to develop criteria for policy to determining decisions with respect to annexes and outbuildings, as this has previously been a grey area. Considering the recent rise in the number of annexes and outbuildings within the curtilage of existing homes being built within the District, Option A is predicted to have an enhanced positive effect on SA topics relating to population and communities and the economy.

3.2.6.2   Development within the Green Belt

Table 45: Replacement, rebuild or extension of existing Green Belt homes options

	Option	Justification as presented in the Issues and Options document
A.	Retain the current policies on replacement, rebuild or extension of existing Green Belt homes	On the whole, our policies in the *Development Management Plan* (DM17 and DM21) are considered to be consistent with the *NPPF*. However there have been a low number of applications, due to the nature of current permitted development rights.
B.	Amend the extension allowance within *Development Management Plan* policies DM17 and DM21	Permitted development rights enable generous extensions, contrary to the *NPPF*, which has encouraged numerous disproportionate, piecemeal, flat roofed extensions. Our current policies could be more flexible to encourage applications for well designed, low pitched roof extensions in line with current permitted development rights. This would take a more 'scenario-based' approach to these types of applications.
C.	Do not have a policy on extensions and rebuilds	There is a need to provide guidance on what is acceptable in the Green Belt, regardless of the permitted development rights. This approach is not considered to be appropriate.

Table 46: Agricultural, forestry and other occupational homes options

	Option	Justification as presented in the Issues and Options document
A.	Retain the current policies	*Development Management Plan* policies DM18 and DM19 are considered to appropriate and fit-for-purpose; and in line with the *NPPF*.
B.	Do not have policies on agricultural, forestry and other occupational homes	There is a need to provide some more specific guidance on how applications for these types of accommodation would be treated, given the extent of the Green Belt in the District. This approach is not considered to be appropriate.

Table 47: Development of previously developed land in the Green Belt options

	Option	Justification
A.	Retain the current policy on previously developed land	*Development Management Plan* policy DM10 is considered to be appropriate in supplementing the provisions of the *NPPF*.
B.	Do not have a policy on previously developed land	Our current policy provides more localised guidance on how applications for the development of previously developed land in the Green Belt in accordance with national planning policy.

Table 48: Extension of domestic gardens in the Green Belt options

	Option	Justification as presented in the Issues and Options document
A.	Retain the current policy on extension of domestic gardens	Our current policy (*Development Management Plan* policy DM22) – particularly in relation to ensuring that extensions are not disproportionate – is working well. However in practice there are concerns about the removal of permitted development rights, and the ability of home owners to enjoy their gardens.
B.	Allow permitted development rights within extended garden areas	Permitted development rights would enable those who have, lawfully, extended their garden into the Green Belt to erect certain structures. This could have an impact on the openness of the Green Belt but it would enable home owners to enjoy their gardens.
C.	Do not have a policy on the extension of domestic gardens	*Development Management Plan* policy DM22 provides detailed guidance on how applications for such extensions into the Green Belt would be treated. Having a local policy on this is considered to be an appropriate response.

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Based on the proposed options under each of these categories, there is a general approach taken which looks to retain existing policies in relation to the Green Belt. Considering the Green Belt constraints, this is seen to be a positive approach as existing policies are consistent with the NPPF, highlighting opportunity for development of land where appropriate. For example, the NPPF (paragraph 89) allows for the redevelopment of brownfield (previously developed) sites whether redundant or in continuing use (excluding temporary buildings), if the scheme would not have a greater impact on the openness of the Green Belt, and the purpose of including land within it, than the existing development. This is reproduced within Policy DM10, and as such remains fit-for purpose, contributing positively to meeting the needs of the District.

For replacement, rebuild or extensions of existing Green Belt homes (Table 45), three options are proposed; of which Option B proposes flexibility in current policy, which is in line with current permitted development rights. Option B would best contribute to the sustainable delivery of homes, encouraging provision which is well-designed, that would likely be in-keeping with the character of the landscape and townscape. Option C is not seen to be viable by the Council and is therefore not a reasonable alternative.

3.2.6.3   Local Businesses

Table 49: Homes businesses options

	Option	Justification as presented in the Issues and Options document
A.	Retain the current policy	Our current approach in *Development Management Plan* policy DM33 is considered to be appropriate in striking a balance between enabling businesses to start-up and prosper at home, provided they would not have an unreasonable negative impact on the residential nature of the local area or neighbours.
B.	Take a more restrictive approach to home businesses	We want to continue to support and nurture home businesses in the District. We have the highest survival rate of new businesses in South Essex as identified in the *EDNA*, and want to continue to improve this trend through supporting start-up businesses. Taking a more restrictive approach to home businesses, which could discourage entrepreneurs in the District and have a negative impact on our local economy, is not considered to be an appropriate approach.
C.	Take a more flexible approach to home businesses	Taking a more flexible approach to home businesses could have a greater negative impact on neighbouring properties through impacting on residential amenity and the local road network for example. As home businesses grow – which we support – there are more suitable locations for such businesses to locate to within the District. It is important that the right balance is struck between supporting and nurturing home businesses and considering the impact on neighbours. The need for grow-on space in the District is considered in more detail in the 'Delivering Homes and Jobs' chapter.
D.	Do not have a policy on home businesses	This is not considered to be an appropriate response to the need to encourage homes business whilst protecting the amenity of neighbouring properties.

Table 50: Alterations to existing business premises options

	Option	Justification as presented in the Issues and Options document
A.	Retain the current policy on existing businesses in the Green Belt	Our current approach in *Development Management Plan* policy DM11 is broadly considered to be appropriate. However, the undefined reference to scale could be misinterpreted.
B.	Include further guidance on the size of extension that would be considered proportionate	This approach would limit the guidance being misinterpreted to potentially allow larger than intended proposals coming forward through the planning application process.
C.	Do not have a specific policy on alterations to existing business premises	The majority of the District is designated as Green Belt land. It is not considered to be an appropriate approach to not have a specific policy on alterations to existing business premises in the Green Belt.

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Rochford District Growth Strategy (2014) sets out a number of actions that are intended to assist local businesses to grow and develop, to promote new business start-ups, to nurture and inspire entrepreneurial talent, and to encourage existing businesses to relocate to Rochford. The Council is therefore keen to support 'home businesses' where possible; however, the Issues and Options Document recognises that the right balance needs to be struck between supporting and nurturing 'home businesses' and considering their potential impact on neighbours. In this context, Table 49 shows that Option A (retaining existing policy) is likely to be most appropriate as it maintains a balance between economic growth and community health and wellbeing. The Council supports the vitality of the local economy through permitting alterations to existing business premises, encouraging the utilisation of existing units as much as possible. Options A and B within Table 50, identified for alterations to existing business premises in the Green Belt, are not mutually exclusive and should be considered in-combination when developing the plan. This would contribute towards reducing misinterpretation of guidance and have positive effects on the population and communities SA topic.

3.2.6.4   Environmental quality

Table 51: Light pollution options

	Option	Justification as presented in the Issues and Options document
A.	Retain our existing policy on light pollution	*Development Management Plan* policy DM5 is fit for purpose, following guidance from professional bodies. It is considered to take into account appropriate factors in determining the suitability of lighting schemes.
B.	Update policy, considering favouring the use of new technologies	Our current policy could be amended to specifically require installation of the best technology (where appropriate) which seeks to reduce the light spillage, glare and sky glow over traditional lighting.
C.	Do not have a policy on light pollution	Such an approach is not considered to be a realistic option as national policy requires us to consider the design and potential impact of lighting schemes at the planning application stage.

Light pollution is highlighted within the detailed policy considerations as a significant issue for the District. Habitats and species have the potential to come under increasing pressure from light induced disturbance, and there may also be changes in tranquillity in and around the District, affected by the levels of light pollution. Existing policy seeks to minimise the impact of light pollution wherever possible, which would be strengthened and enhanced under Option B, considering new technologies where appropriate. Option B (Table 51) therefore performs best, having positive effects on a number of SA topics including biodiversity, landscape, population and human health.

Table 52: Contaminated land options

	Option	Justification as presented in the Issues and Options document
A.	Retain the current policy on contaminated land	*Core Strategy* policy ENV11 is considered to be fit for purpose in supporting the development of suitable brownfield (previously developed) sites wherever possible, whilst ensuring that appropriate investigation, remediation and mitigation measures are implemented.
B.	Do not have a policy on contaminated land	National planning guidance requires that we address the issue of contaminated land through the plan-making process. Failing to have a policy on this is not considered to be an appropriate approach.

There is no evidence to suggest that contaminated land is a significant issue within the District; however, there is support for identifying and remediating contaminated sites over greenfield land wherever possible. Of the two options considered in Table 52, the Council identifies Option A as the preferred approach, proposing to retain the existing policy on contaminated land. Current policy supports the development of suitable brownfield (previously developed) sites wherever possible, whilst ensuring that appropriate investigation, remediation and mitigation measures are implemented. Promoting the

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development of brownfield land would be a positive use of the Districts' natural resources, and may contribute towards relieving pressure on existing constraints. This would likely to have a significant long-term positive effect on land, soil and water resources through the efficient use of land.

3.3   Developing the Preferred Approach

At this stage there has been no decision made in terms of a preferred approach. The Council is currently seeking views from key stakeholders and the public on the key issues and broad options set out in the Issues and Options Document. The majority of proposed options are not mutually exclusive and it is likely that a combination of them will be required to meet the needs of the District during the life of the Plan.

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Part 3: What Happens Next?

4.   Introduction (to Part 3)

The aim of this chapter is to explain next steps in the plan-making / SA process.

4.1   Next Steps

This Interim SA Report will accompany the Issues and Options Document for public consultation in late 2017. Any comments received will be reviewed and then taken into account as part of the iterative plan-making and SA process. Following the consultation, there will be further consideration of more clearly defined spatial strategy options as well as policies for the delivery and management of growth.

The representations received along with further evidence base work, including further SA work, will inform the development of a first draft of the Local Plan (Preferred Options), which is scheduled to be published for consultation in 2018. An updated Interim SA Report will accompany the first draft Local Plan for consultation.

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Rochford District Council

Issues and Options Document: Communication and Engagement Summary 2017

Planning Policy Sub-Committee

17 November 2017

Contents

1 Introduction

1.1 The purpose of this document is to summarise the proposed programme of communication and public engagement for Rochford District Council's forthcoming 'Issues and Options Document' public consultation.

1.2 The Council's adopted Statement of Community Involvement (SCI) 2016[1] sets out the principles for how the Council will engage and consult with the local community – including residents, organisations and businesses – and other interested parties on planning matters.

2 Notification of Issues and Options Document Consultation

1.3 In line with the requirements of the SCI, the Council will employ a range of notification and engagement techniques to raise awareness and encourage public participation at the Issues and Options consultation stage. In particular, the SCI recognises that some potential participants may prefer paper methods of communication, therefore electronic media will not be solely relied on. Furthermore, the Council will endeavour to ensure that its notification techniques reach a broad base of residents, organisations and businesses to ensure that the overall response is representative of the population; this will include employing notification methods designed to reach identified 'hard to reach' groups.

1.4 Table 1 below sets out the notification requirements of the SCI and how these will be delivered at the Issues and Options public consultation stage:

Table 1: Proposed notification techniques

Communication Method set out in Statement of Community Involvement (SCI)	How the Council will meet the requirements of the SCI
Mailing List (Letters) – The Council operates a database of individuals and organisations that have expressed an interest in the plan-making process, have previously been actively involved in policy development or are statutory consultees. Those who wish to be involved will be directly notified at each stage either by email or letter of opportunities to comment.	The Council will send a letter to all those registered on the Planning Policy mailing list and who have set their preferences to letter communications, notifying them of the Issues and Options public consultation, including the dates of the consultation period and how they can comment.
Mailing List (Emails) – as above	The Council will email all those on the Planning Policy mailing list who have set their preferences to electronic communications, including those registered for planning updates through the Council's "Tell Me More" system,

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[1] https://www.rochford.gov.uk/sites/default/files/planning_sci_2016_0.pdf

Communication Method set out in Statement of Community Involvement (SCI)	How the Council will meet the requirements of the SCI
	notifying them of the Issues and Options public consultation, including the dates of the consultation period and how they can comment.
Website – Each consultation stage will feature prominently on the homepage of the Council's website. This will link directly to information on document production, providing access to the consultation material and advice on how and when comments can be made. Articles providing updates on plan production, which may include consultation and engagement opportunities, may be published in Rochford District Matters periodically, but it will not be solely relied upon as a means of communication.	The Council will publicise the Issues and Options public consultation prominently by a banner on the front page of the website. This will link directly to information on document production, providing access to the consultation material and advice on how and when comments can be made. Rochford District Matters is no longer published and updates on plan production will instead be published on the Council's website and periodically through the other identified notification methods at key stages.
Library and Council reception areas – Paper Copies of consultation material, including comment forms, will be available at local libraries and Council reception areas in Rayleigh and Rochford during normal opening hours.	The Council will provide paper copies of consultation materials and paper comment forms in all local libraries and both Rayleigh and Rochford Council offices. These materials will be complemented by posters at all libraries and use of the rolling banner at Council reception areas.
Adverts/public notices, and media briefings – Notices will be placed in a local newspaper advertising consultation and engagement opportunities, where appropriate. Media briefings/press releases will also be issued to local media.	The Council will place newspaper adverts in local publications, highlighting the consultation opportunity and key information including dates of the consultation period and how the reader can comment. A bespoke media pack will also be developed to encourage press/local websites/local television/local radio to promote the ongoing consultation. A press release will be issued on the opening of the consultation, followed by updates/reminders with a 'new angle' to encourage further coverage e.g. figures showing participation to date.
Parish and Town Council and	The Council will contact all local Parish

Communication Method set out in Statement of Community Involvement (SCI)	How the Council will meet the requirements of the SCI
Community Group publications – These types of publications are distributed to local residents at least quarterly. The Council will work with relevant organisations to utilise these publications to notify residents of consultation and engagement opportunities, where possible. Consideration will need to be given to the timing of the consultation, and the timing and circulation of any publications.	and Town Councils, identified community groups and schools, and will request that information about the consultation and key information, including dates of the consultation period and how the reader can comment will be included in any local publications and newsletters.
Posters – Posters may be sent to relevant Parish and Town Councils to be displayed on notice boards to raise awareness of any public consultation and engagement opportunities. Posters may also be displayed in other appropriate locations across the District.	Posters will be produced publicising the consultation opportunity and providing key information including dates of the consultation period and how the reader can comment. These posters will be provided for display on noticeboards at Parish and Town Councils, local medical surgeries, shops, churches libraries, gymnasiums, leisure centres, Council offices and car parks, open spaces, and any other public spaces as considered appropriate. These public spaces have been identified as these are where people congregate, and are likely to visit over the course of the consultation period. The posters will include a QR code for those who wish to access the consultation digitally.
Leaflets – Leaflets may be used to gain wider public awareness of a consultation or engagement opportunity, for example leaflets may be distributed at key attractors/destinations such as train stations and local schools.	Leaflets will be produced publicising the consultation opportunity and provide key information including dates of the consultation period and how the reader can comment. The leaflets will include a QR code for those who wish to access the consultation digitally. These leaflets will be distributed at peak times at the District's railway stations, in order to reach the commuter population, as well as at local events such as local markets and Council events.

Communication Method set out in Statement of Community Involvement (SCI)	How the Council will meet the requirements of the SCI
Social Media – Media such as Twitter will be used to highlight public consultations on planning policy documents with direct links to the Council's website and information on how to comment, and any engagement events. Such messages will be retweeted periodically throughout the consultation period (@RochfordDC). However, comments will not be accepted via social media.	The Council will periodically provide information on its social media profiles publicising the consultation and providing key information, including dates of the consultation period and how the reader can comment. The Council will also use Facebook and Twitter advertising and directed advertisements to help to engage with a wide range of residents, including the harder to reach younger population.
Events – Such events may include drop-in sessions, public exhibitions and/or targeted workshops. Parish and Town Council meetings will be utilised where possible. The type of event undertaken will be dependent on a number of factors, including the consultation stage, and time and resource constraints. Careful consideration will be given to the timing, venue and format of events to ensure accessibility and inclusivity.	The Council will visit local events where residents are likely to congregate, such as the Council-run 'Business Breakfasts' and local markets, to provide information on the consultation and to provide the leaflets described above. The Council will also hold evening 'drop in' events during the consultation period where residents can find out more information about the consultation.

Additional Methods of Consultation:
Radio advertising will provide further opportunities to engage with the local population, with carefully scheduled content. The Council will endeavour to work with the district's schools to engage with their students. These will include a 'peer-to-peer' approach, with students writing features in their own school newsletters explaining the consultation and the reasons that young people should take part. A series of events will also be held at local schools either in assemblies, via student bodies, with students studying related courses, etc. Information will be provided to Council Members and Staff to enable them to answer any queries they might receive in relation to the consultation.

1.5 All consultation materials produced by the Council will be prepared in the corporate format (Arial size 12), however to ensure inclusive access during consultations, information can be made available in alternative formats on request, including larger print, braille, audio tape and different languages.

1.6 The SCI requires at Paragraph 2.5 that where it is identified that the consultation has been ineffective, the Council will reinforce awareness of the active consultation period

through issuing a reminder or repeat notification. Whilst the notification techniques described in Table 1 are considered to be comprehensive and inclusive, the Council will review the effectiveness of the notification techniques periodically throughout the consultation window and will increase publicity where appropriate.

1.7   These monitoring techniques will include:

- Participation figures for the consultation
- Figures relating to how participants were made aware of the consultation (this will be achieved by asking a relevant question of all participants).
- Monitor numbers of web visitors to relevant page
- Collation of analytics provided by social media channels
- Collation of analytics available via the 'TellMeMore' e-bulletin service
- Monitor media coverage

3   Submitting Comments

1.8   In line with the requirements of the SCI, the Council will invite comments on the Issues and Options consultation in the following ways:

- <u>Online</u>: through the Council's online consultation system, available at: www.rochford.gov.uk/iao

- <u>Email</u>: issuesandoptions@rochford.gov.uk

- <u>Post</u>: Planning Policy, Rochford District Council, Council Offices, South Street, Rochford, SS4 1BW

- Fax: 01702 318181

1.9   The Council is unable to accept anonymous comments or comments via telephone or social media. Council Officers will be able to scribe comments for people who cannot make comments on their own due to literacy or disability issues.

1.10   Any derogatory or abusive comments will not be accepted.

1.11   All comments accepted as duly-made will be logged on the Council's online public consultation system and will be available to view online as soon as practical.

4   Next Steps

1.12   Once the consultation period has closed, the comments received will be collated and a Consultation Statement will be produced setting out which individuals and organisations have been consulted, how they have been consulted and the main issues and comments raised by respondents. This Consultation Statement and the comments and issues received will then be used to inform the Council's future Local Plan work, specifically the preparation of the Preferred Options document.