

REPORTS FROM THE EXECUTIVE, COMMITTEES AND SUB-COMMITTEES TO COUNCIL

REPORT OF THE PLANNING POLICY SUB-COMMITTEE

1 LOCAL PLAN: LOCAL DEVELOPMENT SCHEME 2018-2021

- 1.1 This item of business was referred by the Planning Policy Sub-Committee on 31 January 2019 to Council with a recommendation relating to adoption of the draft Local Development Scheme 2018-2021.
- 1.2 An extract of the key elements of the report of the Managing Director to the Sub-Committee is attached at appendix 1 with a copy of the draft Local Development Scheme 2018-2021 attached at appendix 2).
- 1.3 During debate, the question was raised as to whether the Council had taken into consideration the timescale for development of the Local Plan in respect of sites allocated for development going up to 2025/2030 to ensure that sites were developed within that timescale before adding additional sites. It was, however, emphasised that the importance of expediting identified sites had been appropriately raised; however, it was not within the Council's powers to dictate deadlines to developers for development. This did not, however, negate the fact that the Council was expected to continue to produce 5-year plans.
- 1.4 It was noted that officers were unaware of any allocated sites that were not in the process of discussions around development being brought forward. The development process was simple for sites with a single landowner; however, some of the allocated sites were more complicated, with multiple ownership. There was a need for all such owners to reach agreement between themselves and with developers. This could take longer than the Council would wish and posed a risk to the need for a constant 5-year supply of sites.
- 1.5 Members questioned whether newer, emerging sites that appeared likely to proceed to allocation relatively quickly might take the place of slower, previously allocated sites and officers advised that this could potentially be the case in principle but was unlikely. If the Council was to consider removing a site currently allocated for housing from a Plan on the basis that it was slow to progress, it would be likely to encounter issues relating to compensation. It was further emphasised that any landowners submitting an argument to the Council that they had land to put forward that would resolve the Council's housing supply problems would be disappointed. The Council planned properly for development in the District; the Council considered all appropriate policies and allocations through the plan-making process, including the Joint Strategic Plan. The Council should resist the notion that the owner of an unallocated Green Belt site should take precedence over allocated sites or the plan-making process. Within a Green Belt District the National Planning

Policy Framework indicates that sites should only be brought forward through a local planning allocations process.

2 RECOMMENDATION

2.1 It is proposed that Council RESOLVES

That the draft Local Development Scheme 2018-2021 be adopted.

3 GYPSY AND TRAVELLER ISSUES PAPER AND SUSTAINABILITY APPRAISAL: REGULATION 18 CONSULTATION

- 3.1 This item of business was referred by the Planning Policy Sub-Committee on 31 January 2019 to Council with a recommendation relating to publication of the Gypsy and Traveller Issues Paper and accompanying Sustainability Appraisal for formal publication for six weeks, subject to removal of site 340370 Eastwood Road from the paper, the inclusion of specific notes on the current planning status of unauthorised sites, and the checking of all traveller site maps for accuracy.
- 3.2 An extract of the key elements of the report of the Managing Director to the Sub-Committee is attached at appendix 3 with a copy of the draft Gypsy and Traveller Issues Paper and Sustainability Appraisal attached at appendix 4).
- 3.3 The Sub-Committee noted at the meeting on 31 January 2019 that within the last 24 hours written confirmation had been received from the owner of one of the sites, site 340370, listed within the document, along the Eastwood Road, that he wished to withdraw the site. Members confirmed that it would therefore be appropriate to remove that site from the Issues Paper.
- 3.4 It that there were currently two planning appeals in respect of unauthorised traveller sites waiting to be heard. The outcome of any planning appeals relating to unauthorised traveller sites would have to be taken into consideration, including the option of planning applications coming forward for consideration by the Council in respect of granting permission to those unauthorised sites. The capacity of sites would have to be considered on a case by case basis for sites occupied by travellers not wishing to expand those sites if the Council was to consider allowing additional pitches on any sites. The traveller sites would ordinarily be considered inappropriate development within the Green Belt; however, the Council had to take into consideration the outcome of recent planning appeals which had given greater weight to the issue of unmet need for such sites within the District, as well as the potential harmful impact of the sites on the Green Belt. In the case of existing unauthorised sites that may have been in place for some considerable time any impact on the Green Belt would have a degree of permanence. The Council was not seeking to challenge Government policy, but sought to balance competing requirements.

- 3.5 It was noted that the issues paper explored the kinds of facilities that sites might need to include and there was a programme of work planned with the Essex Planning Officers Association (EPOA) in respect of a potential Design Guide for new traveller sites. Some treatment of foul water did fall within the planning system; existing issues should be addressed by a different process to this current one which looked at whether there was planning justification for authorising currently unauthorised sites. At that point issues relating to the treatment of waste might be considered, but only in proportionate detail based on submitted details rather than the settled community's experience of such sites. The document outlined a number of options including authorising sites that were relatively remote from the settled community, although there were also some options that were closer to the settled community.
- 3.6 Officers confirmed that GT1 Michelins Farm was an allocated site and the Council was currently in receipt of a planning application from the new owner of the site for business development at the site, which excluded the area allocated for the traveller site. If Members considered that the Council should take action via its budget processes to seek to acquire the land and develop the site, they had the opportunity to raise the matter for consideration at the Council's forthcoming budget meeting. The site had been put forward by the Council and had been tested through the local plan process and confirmed as a suitable site for delivering traveller accommodation. The site had, however, a complicated and chequered history. A concern had been raised about potential contamination levels at the site and the implications of that on the deliverability of the site. Ownership of the site had now changed and there had been discussions with the new owner about the deliverability of a traveller site. The Council had to determine whether there was a likelihood of a private development taking place on the site for traveller accommodation or whether the owner was willing for there to be a substantial public investment in bringing forward a publicly provided site to make a contribution towards meeting the traveller accommodation needs within the District.
- 3.7 It was noted that the delivery of a traveller site would depend on which options the Council determined should be pursued. Authorising already occupied unauthorised sites was a quicker process than allocating new land for new sites. Allocating new land would require a new development plan document and would take a considerable amount of time to compile. The Council would need to consider all the responses gathered during any public consultation on the broad options outlined in the document. Consultation would provide an opportunity for all members of the community to put forward their views, whether from the settled community or from the traveller community on the issues set out in the paper.
- 3.8 It was noted that the County Council was seeking to develop design guidance for gypsy and traveller sites. This was currently at the scoping stage, assessing what issues the design guide would need to cover. Once that work was well advanced this Council could take a decision as to whether or not to adopt that guidance. This was likely to include guidance around the layout of

sites and, for example, the provision of green space on particularly large sites. The issues paper was looking at the process for bringing forward potential sites.

- 3.9 During debate, Members questioned how many traveller sites with temporary planning permission granted on the basis of exceptional circumstances were included in the document and officers confirmed that two such temporary permissions had been identified in the document, one of which was relatively recently determined on appeal. This apportioned weight in respect of the needs of a child on that particular site. When the Council considered whether or not that particular site was appropriate to be authorised permanently, it would need to consider whether or not the child's need was the only factor in granting that permission and if there were any fundamental reasons why a site in that particular location was not acceptable in planning terms. In terms of the other temporary site, the Council was in receipt of a planning application to extend the temporary permission and there would need to be consideration as to whether or not the circumstances on that site had changed and whether or not there was justification to grant temporary or permanent permission on that site. This would have to take into consideration the site's acceptability in planning terms and also the extent of unmet need within the District and whether there was an alternative site where those people could go, if refused planning permission, as any potential appeal would consider the issue of whether unmet need outweighed any potentially negative impact on the Green Belt. If the Council did not expect the Michelins Farm site to be delivered at the end of the expiry period for these temporary planning permissions, it would have to consider options for providing alternative accommodation for those existing households, including the possibility of the grant of permanent planning permission.
- 3.10 It was noted that it would be possible to include a note in the paper outlining the current planning status on unauthorised sites and indicating, where relevant, whether there was a possibility of such sites, including site TR9, not being delivered.
- 3.11 It was confirmed that the landowner of site TRA12 Greenacres had not formally withdrawn this particular site for use as a traveller site. It was noted that some residents claimed that the map relating to site TRA12 within the document was an old one that was inaccurate. Members stated that there would be merit in all the maps relating to traveller sites within the document being checked for accuracy and replaced where necessary.

4 RECOMMENDATION

- 4.1 That the Gypsy and Traveller Issues Paper and accompanying Sustainability Appraisal be published for formal public consultation for six weeks, subject to the following:-

- (1) That site 340370 Eastwood Road be removed from the Issues Paper.
- (2) That specific notes be included in the Issues Paper outlining the current planning status on unauthorised sites and indicating, where relevant, whether there was a possibility of such sites, including site TR9, not being delivered.
- (3) That all maps relating to traveller sites within the Issues Paper be checked for accuracy and replaced, where necessary.

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NEW LOCAL PLAN: LOCAL DEVELOPMENT SCHEME 2018 - 2021

1 PURPOSE OF REPORT

- 1.1 The Council is required to prepare and keep up to date its timetable for preparing any emerging statutory planning policy documents. The most recent Local Development Scheme (LDS) was adopted by the Council in July 2018 and reflected revisions to the timetable for the Rochford District New Local Plan and the South Essex Joint Strategic Plan (JSP). A further revised LDS has now been prepared to reflect a decision made by Council on 30 October 2018 to prioritise the preparation of a separate Gypsy and Traveller Issues Paper. The revised LDS to which this report relates contains a timetable for the preparation of this Issues Paper.

2 INTRODUCTION

- 2.1 The preparation of the LDS is a statutory requirement¹. It sets out a timetable for any emerging statutory planning policy documents that the Council intends to prepare which will comprise the Local Plan for an area. The LDS enables residents, infrastructure providers, neighbouring Councils and other interested parties to keep track of our progress.

Local Development Scheme: Rochford District New Local Plan

- 2.2 The Council has been working on an early review of its adopted local development plan, which will take the form of a new Local Plan in line with relevant planning legislation, national policy and guidance. This review commenced with a Call for Sites in 2015. A number of key technical studies have been prepared since then – both at the local level and jointly with our neighbours at the sub-regional level – to provide up to date evidence and inform plan-making. This includes topics such as environmental capacity, transport, and housing, retail and employment needs, as well as land availability.
- 2.3 The Council is committed to proactively planning for its area to ensure that an appropriate plan is in place to provide certainty for local communities. Officers have been actively engaging with local communities to seek their views on the first stage of the new Local Plan, the Issues and Options Document, which was consulted on between 13 December 2017 and 7 March 2018. All comments are available to view on the Council's online consultation system.²

¹ [Section 15 of the Planning and Compulsory Purchase Act 2004](#), as amended by the Localism Act 2011

² www.rochford.jdi-consult.net/localplan/readdoc.php?docid=201

- 2.4 A feedback report summarising the outcomes of this consultation will be considered as part of a separate Agenda item at this meeting of the Planning Policy Sub-Committee.
- 2.5 A revision to the Council's Local Development Scheme is necessary to reflect a decision made at the 30 October 2018 meeting of Council to prioritise the preparation of a Gypsy and Traveller Issues Paper, ahead of the 'Preferred Options' draft of the New Local Plan.
- 2.6 This Issues Paper is considered to be a prudent step in effectively meeting the needs of the Gypsy and Traveller community in the District. This Paper considers the current policy situation and its implementation, and seeks to refine the options for future policy. This Issues Paper will be considered as part of a separate Agenda item at this meeting of the Planning Policy Sub-Committee with a recommendation to publicly consult in due course.
- 2.7 Whilst not considered by Council at this stage, the Local Development Scheme has also been revised to reflect a possible timetable for the preparation of 'Preferred Options' and Final Submission versions of a Gypsy and Traveller Accommodation Development Plan Document (DPD), should the Council consider it prudent to prepare a separate DPD on an accelerated timescale relative to the new Local Plan.
- 2.8 Timetables for the New Local Plan, Community Infrastructure Level (CIL) and South Essex Joint Strategic Plan are unchanged from the LDS adopted by the Council in July 2018.

3 RISK IMPLICATIONS

- 3.1 The Ministry for Housing, Communities and Local Government (MHCLG) is taking a keener interest in the progress of Local Planning Authorities in preparing their Local Plans since the publication of the NPPF in 2012. Three South Essex authorities are being closely monitored by the Government to ensure that they accelerate their plan-making functions, as they have failed to consistently deliver and adopt an appropriate strategy to plan for the future of their areas.
- 3.2 MHCLG is likely to use the Council's published LDS as a tool to monitor future performance, given the Government's intention to speed up the planning process through the measures indicated within the emerging NPPF.
- 3.3 Publication of an up to date LDS is a statutory requirement for the Council. It is important that the LDS is updated to reflect current progress on the preparation of the new Local Plan, commitment to joint working to satisfy the Duty to Co-operate and that any monitoring undertaken by DCLG is based on the Council's current position.

4 ENVIRONMENTAL IMPLICATIONS

- 4.1 The delivery of a robust local planning framework will set out an appropriate strategy for the use of land in the district; including the enhancement and protection of sites designated for their local and national nature conservation interests, and historic assets.

5 RESOURCE IMPLICATIONS

- 5.1 The approval of the draft LDS 2018-2021 provides a framework for how the Council will prepare the new Local Plan, Gypsy and Traveller Issues Paper and a CIL charging schedule. The anticipated costs of delivering these are to be met from investments in the existing budget provision.
- 5.2 To support the delivery of a Joint Strategic Plan for South Essex, the six South Essex authorities and Essex County Council successfully bid for £871,000 from the Government through the Planning Delivery Fund (announced in the housing White Paper). It is anticipated that there will be further opportunities to bid for monetary support from the Planning Delivery Fund. However, should the bid be unsuccessful, provision may need to be made from within existing budget provisions to continue to support its delivery, given the Secretary of State's discretion to use his intervention powers to accelerate plan-making.
- 5.3 Enabling a robust local planning framework will facilitate delivery of sustainable growth in the district. The planning system directly contributes income to the Council through Section 106 agreements, CIL (with the intention to bring this forward alongside the new Local Plan) and the New Homes Bonus to enable infrastructure and service delivery district-wide.

6 LEGAL IMPLICATIONS

- 6.1 Under section 15 of the Planning and Compulsory Purchase Act 2004, as amended, the Council is required to prepare and maintain its LDS. The LDS sets out the emerging planning policy documents that the Council is going to prepare to set out a clear and appropriate future strategy for the area.
- 6.2 The Council is required to prepare these documents under Section 17(3) of the Planning and Compulsory Purchase Act 2004 in order to set out its policies relating to the development and use of land in its area. Section 13 of this Act requires the Council to keep under review matters which may affect the development of its area. Section 17(6) of the Act also requires the Council to keep under review its planning policy documents in light of any review of its policies.
- 6.3 Other sections of the Planning and Compulsory Purchase Act 2004, and Town and Country Planning (Local Planning) (England) Regulations 2012 provide the legal basis for the current plan-making system. These are

supported by the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG).

- 6.4 The Secretary of State has powers to intervene in plan-making under Section 27 of Planning and Compulsory Purchase Act 2004 where he considers a Council to be failing or omitting to do anything necessary in connection with the preparation, revision or adoption of a planning policy document.

7 EQUALITY AND DIVERSITY IMPLICATIONS

- 7.1 An Equality Impact Assessment has been completed and found there to be no impacts (either positive or negative) on protected groups as defined under the Equality Act 2010.

Rochford District Council
Draft Local Development
Scheme 2018-2021
Planning Policy Sub-Committee

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1 Introduction

- 1.1 The Council is required to prepare a Local Development Scheme (LDS) under Section 15 of the Planning and Compulsory Purchase Act 2004. The purpose of the LDS is to set out the programme for the preparation of the Council's planning policy documents. The Council's first LDS was adopted in 2005 and has since been subject to a number of updates, the most recent of which was July 2018. This revised LDS covers 2018 to 2021, and will be reviewed regularly to ensure that there continues to be a realistic and achievable programme for the preparation of the Council's planning policy documents.
- 1.2 Community and stakeholder involvement is a key component of the planning system. Public participation will take place at an early stage in the preparation of the Council's planning policy documents. The LDS is the document which the public can use to find out what the Council is proposing to do and when, and at what stage they can expect to be involved in the planning process.

2 Adopted Planning Policy Documents

- 2.1 The adopted local development plan (as of June 2018) consists of seven development plan documents and a number of supporting supplementary planning documents. These documents were produced under the previous Local Development Framework (LDF) system, which has since been superseded by the reintroduction of single Local Plans through the Localism Act 2011.
- 2.2 These documents were prepared in accordance with the Council's Statement of Community Involvement (SCI), which was adopted January 2007. This has since been superseded by a revised SCI which was adopted in July 2016 to support the preparation of the new Local Plan. The SCI outlines how the Council intends to involve the local community, as well as other stakeholders, in the preparation of its planning policy documents, the consideration of planning applications and enforcement action.

Adopted Development Plan Documents

- 2.3 The Council has produced and adopted seven development plan documents, which together form the statutory local development plan for the district. Development plan documents set out the planning policies which planning applications are assessed against. These documents, detailed below, have been adopted following independent examination by a Planning Inspector:
 - Core Strategy (adopted December 2011) sets out the spatial vision, strategic objectives and core policies up to 2025;
 - Allocations Plan (adopted February 2014) sets out site specific policies and land use allocations over the plan period;
 - Development Management Plan (adopted December 2014) sets out detailed policies for managing development across the District;
 - London Southend Airport and Environs Joint Area Action Plan (adopted December 2014), produced in conjunction with Southend Borough Council, sets out detailed policies for managing growth and change at the airport and in the surrounding area;

- Hockley Area Action Plan (adopted February 2014) sets out detailed policies for managing development in the centre of Hockley;
- Rochford Town Centre Area Action Plan (adopted April 2015) sets out detailed policies for managing development in and around Rochford town centre;
- Rayleigh Centre Area Action Plan (adopted October 2015) sets out detailed policies for managing development in the centre of Rayleigh.

Adopted Supplementary Planning Documents

2.4 Supplementary planning documents are non-statutory documents that give further guidance on the policies and proposals set out in development plan documents. Whilst supplementary planning documents must be in conformity with development plan documents and subject to public consultation, they do not have to go through independent examination.

2.5 The Council has adopted a number of such guidance documents including:

- Educational Contributions (adopted January 2007);
- Housing Design (adopted January 2007);
- Shop Fronts - Security and Design (adopted January 2007);
- Design Guidelines for Conservation Areas (adopted January 2007);
- Design, Landscaping and Access Statements (adopted January 2007);
- Parking Standards Design and Good Practice (adopted December 2010);
- Playing Pitch Strategy (adopted April 2012);
- Local List (adopted December 2013).

Adopted Statement of Community Involvement

2.6 The level of participation in the preparation of the Council's planning policies has dramatically increased since the first Statement of Community Involvement (SCI) came into effect in 2007. However, there have inevitably been a number of legislative changes on community engagement since its adoption and, taking into consideration the Council's more recent consultation and engagement experience, the Council undertook a review of the 2007 SCI and updated where necessary.

2.7 The revised SCI was consulted on for a nine week period between 16 March and 18 May 2016, and was adopted by the Council on 19 July 2016. The SCI sets out how the Council will engage with the local community and other stakeholders throughout the preparation of the new Local Plan and Community Infrastructure Levy (CIL) Charging Schedule in particular. The preparation of the SCI was in line with the timetable adopted on 23 February 2016.

- 2.8 The Council has subsequently prepared three addendums to its adopted SCI, relating to the preparation of the South Essex Joint Strategic Plan (JSP) and neighbourhood planning arrangements. It is intended that these addendums will be consulted on in Spring 2019.

3 Proposed Planning Policy Documents

- 3.1 The Council is looking to prepare two planning documents; a new Local Plan and Community Infrastructure Levy (CIL) Charging Schedule.

New Local Plan

- 3.2 The Council is committed to an early review of its Core Strategy. This will take the form of a new single Local Plan, which will become the principal development plan document for the district. It will include the Council's strategy for future development across the district; specific proposals and the allocation of specific sites to realise this strategy; and development management policies to support these. In particular it will ensure that policies are in place to meet development needs for residential and employment use throughout the district over the next 20 years.
- 3.3 The new Local Plan will be part of the statutory local development plan and on its adoption it will supersede a number of policies within the current adopted local development plan (as set out at paragraph 2.3). As to which policies will be superseded, this will be dependent on the outcome of the plan-making process in respect of the new Local Plan, and which policies are ultimately included in the final, adopted version.
- 3.4 Community and stakeholder involvement will be a key element in the preparation of the new Local Plan. As with past development plan documents, the new Local Plan will be produced in stages, with opportunities for the public and other interested parties to participate in the decision-making process on a wide range of planning issues. The Council will also continue to engage with specific prescribed bodies, such as neighbouring Local Authorities, as part of the Duty to Co-operate.
- 3.5 Early engagement with local communities – both residents and businesses – took place over Summer/Autumn 2016. This has included a programme of parish workshops supplemented by a community survey. Such early engagement has enabled local communities to input into the first stage of the new Local Plan; the Issues and Options Document. Consultation on the Issues and Options Document (and draft Sustainability Appraisal) took place for a 12 week period between 13 December 2017 and 7 March 2018.
- 3.6 The new Local Plan will also need to be supported by an evidence base covering a range of topics which will be prepared and reviewed throughout the preparation of the Plan. A number of key evidence base documents are being prepared or reviewed including a Strategic Housing and Employment Land Availability Assessment (SHELAA), a Strategic Housing Market Assessment (SHMA) and an Economic Development Needs Assessment (EDNA). Other evidence relating specifically to highways, education and infrastructure in general are also being prepared. The preparation of such evidence, particularly in relation to highways (modelling options and potential mitigation measures), could have an impact on timescales. It is important therefore that the LDS is kept under review; and that the timescales are ambitious but realistic.

- 3.7 Some supporting documents will be available for comment alongside the new Local Plan, including the Sustainability Appraisal/Strategic Environmental Assessment and Habitats Regulations Assessment. The timetable for the new Local Plan is set out below:

Stage	Target Date
Preferred Options Document public consultation (Regulation 18)	October / November 2019
Proposed Pre-Submission Document public consultation (Regulation 19)	October / November 2020
Submission to Secretary of State for independent examination (Regulation 22)	Winter 2020
Examination hearings	Spring 2021
Inspector's Report expected	Summer 2021
Adoption by Full Council	Summer 2021

- 3.8 The timetable for the preparation of the new Local Plan will be refined further as the document is progressed, and will need to take account of any changes at the national policy level as these emerge.

Community Infrastructure Levy (CIL) Charging Schedule

- 3.9 The Council intends to produce a Community Infrastructure Levy (CIL) which will detail a schedule of charges to be paid by developers to contribute towards the implementation of infrastructure. The CIL will set a charge per square metre of new floorspace which will be levied on new development across the District, where applicable. As with the new Local Plan there is a requirement for consultation and independent examination of the CIL.
- 3.10 Taking into account the current CIL Regulations, the Levy would be inherently linked to the preparation of the new Local Plan and will be supported by a robust evidence base, in particular a Viability Assessment to determine what can be charged; as well as an Infrastructure Funding Gap Assessment to identify the funding gap for the delivery of necessary infrastructure. As such it is anticipated that the preparation of the CIL will, for the most part, run alongside the new Local Plan. The timetable for the CIL is set out below:

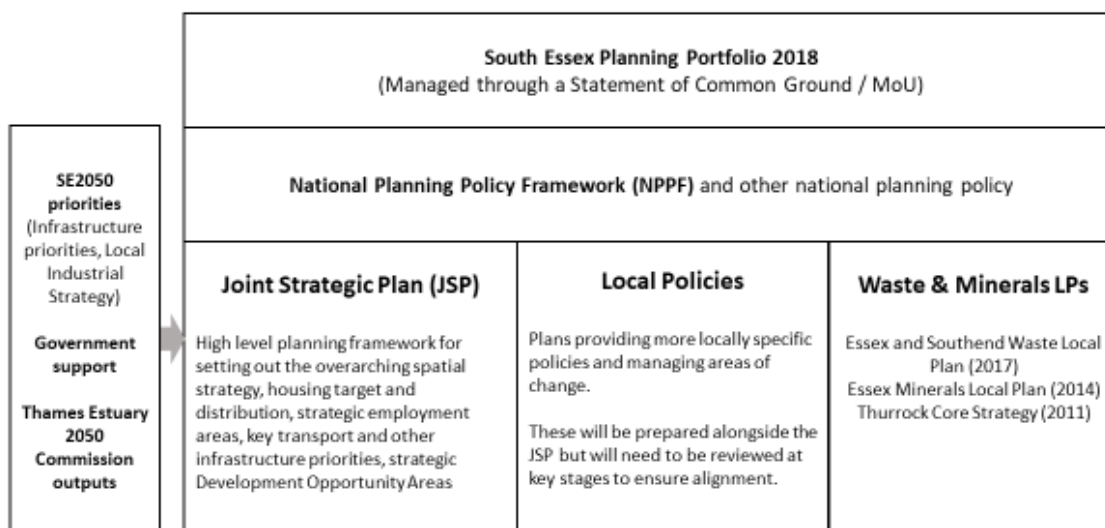
Stage	Target Date
Evidence base preparation	2018/2019
Preliminary Draft Charging Schedule public consultation	Summer / Autumn 2019
Draft Charging Schedule public consultation	Summer / Autumn 2020
Submission to Secretary of State for independent examination	Winter 2020
Examination hearings	Spring 2021

Stage	Target Date
Inspector's Report expected	Summer 2021
Adoption by Full Council	Summer 2021

- 3.11 The timetable for the preparation of the CIL will be refined further as the document is progressed, and will need to take account of any changes at the national policy level or new regulations as these emerge.

South Essex Joint Strategic Plan

- 3.12 The local authorities across South Essex have a history of working collaboratively on a range of issues to develop appropriate approaches to meet common strategic aims and objectives. Building on this partnership working approach, the Leaders and Chief Executives from Basildon, Brentwood, Castle Point, Rochford, Southend-on-Sea and Thurrock Councils, and Essex County Council initiated an approach of collaboration to develop a long-term place-based growth ambition in July 2017. This culminated in the signing of a South Essex 2050 Memorandum of Understanding in January 2018. A joint approach will enable South Essex to collectively support economic growth and sustainable development across the sub-region and effectively respond to external pressures, such as the Thames Estuary 2050 Commission and the London Plan.
- 3.13 Part of the South Essex ambition to effectively deal with the challenge of growth will be realised through the preparation and adoption of a Joint Strategic Plan. The Joint Strategic Plan will be a high-level planning framework covering the whole of South Essex, which includes the six local authorities listed above. It will set out the overarching spatial strategy for the sub-region, a target and distribution of new homes and jobs, strategic development opportunities and key transport and other infrastructure priorities to support growth. It is set to deliver a minimum of 90,000 new homes and 52,000 new jobs by 2038 (based on available evidence as of June 2018), and once adopted it will form part of the local development plan for the District.
- 3.14 A Statement of Common Ground has been prepared, in accordance with the NPPF, to support the preparation of the Joint Strategic Plan. This will ensure that there is not only a proactive and positive approach to strategic planning matters across the sub-region, but that there is a clear (and agreed) approach to how these will be delivered in all relevant local planning documents.
- 3.15 The relationship between Rochford District's new Local Plan and the Joint Strategic Plan is illustrated in the diagram below:



3.16 The timetable for the Joint Strategic Plan is set out below:

Stage	Target Date
Spatial strategy options, including preferred option (Regulation 18)	Spring 2019
Final Pre-Submission Draft (Regulation 19)	December 2019
Submission to Secretary of State for independent examination (Regulation 22)	March 2020
Adoption	Autumn 2020

Gypsy and Traveller Accommodation

- 3.17 In October 2018, the Council decided to prioritise the preparation of a separate Gypsy and Traveller 'Issues Paper' which specifically considers the current and future accommodation needs of Gypsy and Traveller households within the District. This was considered prudent given that the Council's existing allocation for Gypsy and Traveller accommodation (Policy GT1 – Michelins Farm) has not been delivered. The Council considers the preparation of an Issues Paper to be a suitable and pro-active step in identifying an appropriate supply of pitches in accordance with national policy.
- 3.18 This Issues Paper will be subject to public consultation in accordance with Regulation 18 of the Local Planning Regulations 2012, and the Council's adopted Statement of Community Involvement (SCI).
- 3.19 The Council intends to use the findings of the Issues Paper consultation to shape and inform the Preferred Options draft of the New Local Plan. Following consultation on the Issues Paper, the Council may consider the prudence of developing a separate Gypsy and Traveller Accommodation Development Plan Document (DPD) to help

meet the needs of the Gypsy and Traveller community on an accelerated timescale, relative to the New Local Plan. The table below provides a timetable for the preparation of the Issues Paper, and any DPD should it be prioritised by the Council. The timetable for the New Local Plan is provided on Page 6.

Stage	Target Date
Issues Paper public consultation (Regulation 18)	Spring 2019
Preferred Options public consultation (Regulation 18)**	Summer 2019
Final Pre-Submission Draft public consultation (Regulation 19) **	Winter 2019
Submission to Secretary of State for independent examination (Regulation 22)**	Spring 2020
Adoption **	Summer 2020

** If the Council decides to prepare a separate Gypsy and Traveller Accommodation Development Plan Document (DPD)

4 Other Statutory and Non-Statutory Planning Documents

Supplementary Planning Documents

- 4.1 The Council has adopted a number of Supplementary Planning Documents to date. Whilst it is not anticipated that these guidance documents will need to be revised at present, the Council's adopted documents will be kept under review as the new Local Plan and CIL progress. The LDS will be updated as necessary.
- 4.2 It was recognised in late 2017 that there was a need to work collaboratively with neighbouring Councils throughout Essex to ensure a consistent approach to preventing disturbance to protected habitats and species along the coast. As such, since December 2017 11 districts and boroughs across Greater Essex* have been working together alongside Natural England to create a Recreational disturbance Avoidance Mitigation Strategy (RAMS) and SPD to set out a strategic approach to identifying the scale of recreational disturbance to Special Protection Areas, Special Areas of Conservation and Ramsar sites along the Essex coast and propose measures to mitigate potential impacts. It is expected that the RAMS SPD will be adopted by April 2019, and will be integrated into the Council's new Local Plan..

Neighbourhood Plans

- 4.3 Neighbourhood Plans are community-led plans for guiding the future development and growth of a local area introduced by the Localism Act (2011). Such plans must be in general conformity with the strategic policies in the local development plan for the

* Basildon Borough Council, Braintree District Council, Brentwood Borough Council, Castle Point Borough Council, Colchester Borough Council, Chelmsford City Council, Maldon District Council, Rochford District Council, Southend-on-Sea District Council, Tendring District Council and Thurrock Council

area. They are subject to independent examination and referendum, and once adopted will form part of the statutory local development plan for the area.

- 4.4 In areas with defined parishes, such as Rochford District, these plans can be prepared by the Parish or Town Councils in consultation with the local community. As of June 2018 one formal application had been received by the Council for the designation of Neighbourhood Areas. Details are published on the Council's website[†].

Minerals and Waste Local Plans

- 4.5 Essex County Council is responsible for preparing Minerals and Waste Local Plans, and determining planning applications for minerals and waste uses across Essex (excluding Southend and Thurrock unitary authorities). As of June 2018 the following local development documents had been prepared and adopted by Essex County Council:
- Minerals Local Plan (adopted July 2014)
 - The Essex and Southend Waste Local Plan (adopted July 2017)
- 4.6 These policy documents form part of the statutory local development plan for the district and can be viewed online at www.essex.gov.uk.

Authority (formerly Annual) Monitoring Report (AMR)

- 4.7 The Authority (formerly Annual) Monitoring Report (AMR) is a document prepared by the Council which includes information on progress of local development plan preparation. This report is published on the Council's website at the earliest opportunity.

5 Monitoring and Review

- 5.1 The Council's progress in respect of plan production will be monitored through the AMR. Each year the AMR will:
- show how the Council is performing against the timescales in the LDS for the preparation of development plan documents and supplementary planning documents;
 - consider the effectiveness of extant policies in advance of the adoption of new planning policy documents;
 - monitor local development plan policies against a set of government, regional and local indicators; and
 - provide an up to date list of documents in preparation and adopted, and provide details of future reviews of those documents.
- 5.2 This LDS sets out broad timetables for the preparation of the new Local Plan, CIL Charging Schedule and the Joint Strategic Plan for South Essex. These timetables will be reviewed and refined as the document production progresses.

[†] www.rochford.gov.uk/planning-and-building/planning-policy/neighbourhood-planning

6 Risks and Mitigation

- 6.1 There are a number of key risks which could impact on the delivery of these planning policy documents by the broad targets that have been identified. The key risks and potential mitigation measures include:

Risk	Level of Risk	Potential Mitigation
Changes to national policy and/or legislation	Medium/ High	Keep up to date with national policy and/or legislative changes Make amendments to emerging policies and undertake additional consultation as necessary
Lack of capacity/resources to deliver planning policy documents by timescales identified	Medium/ High	Consider options for increasing capacity/resources, including recruiting temporary staff Timescales may need to be reviewed
Failure for infrastructure to be delivered by the relevant providers, e.g. Essex County Council, to appropriately support development	Low	Consider alternative options for delivering infrastructure, including exploring an infrastructure-first approach and maximising funding opportunities Ongoing engagement and consultation with infrastructure providers at all stages of the plan-making process to ensure objectives are aligned and information is shared
Lack of capacity/resources to support preparation of Neighbourhood Plans	Medium/ High	Consider options for increasing capacity/resources, including recruiting temporary staff Ongoing engagement with Parish or Town Councils throughout the plan-making process
Lack of capacity/resources within external organisations including Planning Inspectorate	Medium	Early and ongoing engagement with key organisations needed to minimise risk Timescales may need to be reviewed

Risk	Level of Risk	Potential Mitigation
Significant public opposition to planning policy document	Medium / High	Effective Member and public engagement Clear communication Robust evidence, including community participation
Legal compliance and soundness tests not met at examination	Medium	Robust, evidence based plan Effective public engagement Ongoing engagement with specific prescribed bodies as part of the Duty to Co-operate
Legal challenge to adoption of a planning policy document	Medium / High	Ensure that procedures and regulatory requirements are followed Seek legal advice as required
Budget shortfalls as a result of timetable delays, examination length and / or legal challenge	Medium	Regular budget monitoring Seeking external funding sources e.g. Planning Delivery Fund Ongoing engagement with S151 officer and Leadership Team



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GYPSY AND TRAVELLER ISSUES PAPER AND SUSTAINABILITY APPRAISAL: REGULATION 18 CONSULTATION

1 PURPOSE OF REPORT

- 1.1 Pursuant to a decision made by Council on 30 October 2018, a Gypsy and Traveller Issues Paper (GTIP) has been prepared setting out the identified challenges and options for meeting the present and future accommodation needs of the Gypsy and Traveller community in the District; this includes considering how best to provide a sufficient number of accommodation pitches, and how to ensure that those sites are located, designed and laid out in the most appropriate way.
- 1.2 It is recommended that the Gypsy and Traveller Issues Paper, and its accompanying Sustainability Appraisal, are subject to a six-week period of public consultation between 25 February 2019 and 5pm on 8 April 2019, in accordance with Regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012; and the Council's adopted Statement of Community Involvement (SCI).

2 INTRODUCTION

National Policy Context

- 2.1 The Housing Act 2004, as amended by the Housing and Planning Act 2016, requires local authorities to include Gypsy and Traveller needs in their accommodation assessments, and to prepare a strategy in respect of meeting such accommodation needs as part of their overall housing strategy.
- 2.2 Furthermore, the National Planning Policy Framework (NPPF) 2018 requires local planning authorities to assess the size, type and tenure of housing needed for different groups in the community, and reflect these in planning policies (including, inter alia, the needs of the Gypsy and Traveller community). The Government has also issued a specific Planning Policy for Traveller Sites (PPTS) document in 2015, which expands upon the NPPF and provides specific guidance on planning for Gypsy and Traveller sites.
- 2.3 Paragraph 4 of the PPTS sets out the Government's aims in respect of planning for (Gypsy and) Traveller sites, these being:
 - that local planning authorities should make their own assessment of need for the purposes of planning;
 - to ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites;

- to encourage local planning authorities to plan for sites over a reasonable timescale;
 - that plan-making and decision-taking should protect Green Belt from inappropriate development;
 - to promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites;
 - that plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective;
 - for local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies;
 - to increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply;
 - to reduce tensions between settled and traveller communities in plan-making and planning decisions;
 - to enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure; and
 - for local planning authorities to have due regard to the protection of local amenity and local environment.
- 2.4 In order to deliver these aims, the Council is required by national policy to identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets; and identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15. However, in planning for Gypsy and Traveller needs, the Council must also ensure its approach protects local amenity and the environment.
- 2.5 In seeking to guide the spatial delivery of Gypsy and Traveller sites, local planning authorities must ensure such sites are sustainable economically, socially and environmentally. In general, national policy requires sites to:
- promote peaceful and integrated co-existence between the site and the local community;
 - promote, in collaboration with commissioners of health services, access to appropriate health services;
 - ensure that children can attend school on a regular basis;

- provide a settled base that reduces both the need for long-distance travelling and possible environmental damage caused by unauthorised encampment;
- provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers that may locate there or on others as a result of new development;
- avoid placing undue pressure on local infrastructure and services;
- not be located in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans; and
- reflect the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability.

2.6 Gypsy and Traveller communities are protected against race discrimination under the Equality Act 2010. The Council has a responsibility under the Public Sector Equality Duty provisions of the Act to ensure that its actions help to eliminate unlawful discrimination, harassment and victimisation, advance equality of opportunity between those who share a protected characteristic and those that do not, and to foster good relations between people who share a protected characteristic and those that do not. The Council must ensure that its approach to planning for Gypsy and Traveller needs acknowledges, upholds and protects the provisions of the Equality Act and the Public Sector Equality Duty.

Local Policy Context

- 2.7 The Council's current local development plan comprises a suite of documents, including a Core Strategy 2011, Development Management Plan 2014, Allocations Plan 2014 and four area action plans. These set the overarching vision and planning policies for the District up to 2025.
- 2.8 Policy H7 of the Core Strategy sets out the Council's overarching policy towards Gypsy and Traveller accommodation. In response to Policy H7, and its commitment to allocate sufficient land to meet identified needs for 15 pitches by 2018, Policy GT1 of the Allocations Plan allocated a 1 hectare plot of land at Michelins Farm for Gypsy and Traveller accommodation.
- 2.9 This policy further sets out the specific requirements and expectations for the delivery of the site, including design principles, site layout, decontamination requirements and landscape and boundary treatments.
- 2.10 As of December 2018, Michelins Farm is yet to be delivered or be subject to a planning application. Its lack of delivery to date has impinged on the Council's ability to demonstrate a five-year supply of pitches, and has contributed, in part, to two recent allowed appeal decisions (APP/B1550/C/16/3162651 &

APP/B1550/W/17/3174424) on the basis of unmet need, despite harm to the Green Belt being identified in both cases.

- 2.11 This lack of delivery has contributed, in part, to the Council's decision at the 30 October 2018 meeting of Council to prioritise the preparation of this Issues Paper. This Issues Paper is considered to provide a pro-active and prudent review of the Council's approach to meeting Gypsy and Traveller accommodation needs.

Gypsy and Traveller Issues Paper

- 2.12 The Issues Paper has been informed by the latest assessment of need provided by the South Essex Gypsy, Traveller and Travelling Showpeople Assessment (GTAA) 2018 which will be considered under a separate agenda item at the 31 January 2019 meeting of the Sub-Committee.
- 2.13 The GTAA 2018 found the District to contain 7 permanently authorised sites with a total of nine pitches. In addition, there are 2 temporarily authorised sites with a total of two pitches and 5 unauthorised sites with a total of thirteen pitches, however these sites cannot be considered to constitute part of the District's permanent supply.
- 2.14 The GTAA 2018 identifies need for 18 additional pitches (beyond the District's permanent supply) for those travellers considered to meet the definition of a traveller in the PPTS; 3 additional pitches from unknown households; and 11 additional pitches for households who do not meet the definition of a traveller. Whilst the Council is not required to plan for pitches for those households who do not meet the PPTS definition of a traveller, it is still required to meet their needs through its wider housing strategy.
- 2.15 National policy suggests the Council should adopt a criteria-based approach to assessing potential sites for Gypsy and Traveller accommodation. The GTIP considers several topics which could be factored into a criteria-based assessment including proximity to basic services, green belt, flood risk, landscapes and visual Impact, biodiversity and wildlife, heritage assets, access and infrastructure, and amenity and site conditions. The GTIP presents options including whether to retain the Council's existing criteria-based policy in the Core Strategy (Policy H7), to expand or amend the criteria-based policy, or to not pursue a criteria-based policy.
- 2.16 The GTIP also presents different options for meeting the needs of Gypsy and Traveller communities, including through retaining the Council's existing allocation at Michelins Farm, authorising existing sites, allow sites to expand or intensify, to allocate new sites and to re-open the 'Call for Sites' process to identify any additional site options. It is expected that any criteria-based assessment policy could be used to assess these site options.

- 2.17 The GTIP also considers how best to ensure that new sites are designed and laid out to meet the needs of households and protect local amenity and the environment. It presents options around site size, layout, facilities and vehicle parking arrangements. The GTIP also considers possible options for site delivery and management including sites being delivered and managed by private households, landlords, registered social landlords, the public sector or a mix of options.
- 2.18 In addition to permanent sites, the PPTS requires the Council to consider the travelling needs of the Gypsy and Traveller community, including the temporary or transit accommodation needs of those households who may have a fixed base elsewhere but who are travelling through the District for work or other reasons. The GTIP presents options for whether such temporary or transit sites should be delivered within the District or whether a collaborative approach with neighbouring authorities should be pursued.

Interim Sustainability Appraisal

- 2.19 The preparation of a Sustainability Appraisal (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). The Council is required to publish a draft SA for consultation alongside any draft plan. Further guidance on the preparation of a SA, and its impact on plan-making, is contained within the Planning Practice Guidance.
- 2.20 The interim SA provides an initial analysis of the sustainability of presented options and approaches within the Issues Paper. The level of analysis within an SA increases as its accompanying Plan refines in scope.
- 2.21 The findings of the SA, and any relevant representations received through this consultation, will help to inform the preparation of future draft Plans and SAs.

Next Steps

- 2.22 Following the consultation, the Council will consider any representations received and use these to inform its subsequent approach to planning for Gypsy and Traveller accommodation needs. The Council intends to publish a 'Feedback Report' in due course to summarise and provide an initial response to the issues, opportunities and comments raised through this consultation.

3 RISK IMPLICATIONS

- 3.1 If the Council does not take a prudent and pro-active approach to addressing the needs of the Gypsy and Traveller community, it risks failing to demonstrate a five-year supply of pitches in accordance with the National Planning Policy Framework (NPPF) and Planning Policy for Traveller Sites (PPTS). If the Council cannot demonstrate a supply of pitches it may be required to allow

pitches, either by application or by appeal, on non-preferable sites to address unmet need.

4 ENVIRONMENTAL IMPLICATIONS

- 4.1 The potential environmental implications of the identified options have been set out within the Interim SA Report, where possible.

5 RESOURCE IMPLICATIONS

- 5.1 The preparations of this Gypsy and Traveller Issues Paper, and accompanying Sustainability Appraisal, have been met within existing agreed budgets and resources.

6 LEGAL IMPLICATIONS

- 6.1 The Housing Act 2004, as amended by the Housing and Planning Act 2016, requires local authorities to include Gypsy and Traveller needs in their accommodation assessments, and to prepare a strategy in respect of meeting such accommodation needs as part of their overall housing strategy. The Council is further required by national policy to identify and update annually, a supply of specific deliverable sites to provide 5 years' worth of sites against their locally set targets; and identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15. The preparation of this GTIP is considered to be a prudent and pro-active step to meet these obligations; without this approach, the Council may not be able to demonstrate compliance with these legislative and policy requirements.
- 6.2 The Council must also ensure that any formal consultation on a draft Plan fulfils the requirements of Regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012 and its adopted Statement of Community Involvement (SCI). If the Council fails to meet these requirements, its eventual Plan may be found unsound at examination.
- 6.3 A Sustainability Appraisal is legally required to accompany a draft Plan to assess the environmental implications of any proposals.

7 EQUALITY AND DIVERSITY IMPLICATIONS

- 7.1 The Public Sector Equality Duty applies to the Council when it makes decisions. The duty requires us to have regard to the need to:
- To eliminate unlawful discrimination, harassment and victimisation
 - To advance equality of opportunity between people who share a protected characteristic and those who do not
 - To foster good relations between those who share a protected characteristic and those who do not.

- 7.2 The protected characteristics are age, disability, gender, race, sexual orientation, religion, gender reassignment, marriage/civil partnerships, pregnancy/maternity.
- 7.3 The Equality Impact Assessment (EIA) indicates that the proposals in this report will not have a disproportionately adverse impact on any people with a particular characteristic.

1 Introduction

Purpose and Scope

- 1.1 A *Gypsy and Traveller Issues Paper* (GTIP) has been prepared by Rochford District Council in order to identify, analyse and consult on possible approaches to meeting the existing and future needs of Gypsy and Traveller communities within the District.
- 1.2 The issues identified in the GTIP focus on providing and maintaining an adequate supply of sites to meet demand and lifestyle needs, ensuring that the types of site delivered are the most appropriate, and that these are managed and delivered in the best possible way.
- 1.3 This GTIP will be subject to public consultation under Regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012. The purposes of this consultation are:
 - To ensure that the issues identified are the correct ones and that any additional issues are identified for consideration;
 - To ensure that options and opportunities to address identified issues are informed by engagement with relevant stakeholders, including potential sites for allocation;
 - To establish robust and informed criteria for the selection and delivery of suitable and appropriate sites in the future; and
 - To identify any additional, relevant information which can help to inform and shape the Council's future approach to planning for Gypsy and Traveller needs.

How can you have your say?

- 1.4 We are inviting comments on the Gypsy and Traveller Issues Paper and its accompanying Draft Sustainability Appraisal from **25 February 2019 until 5pm on 8 April 2019**. 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 Strategic Planning consultations available at this www.rochford.gov.uk/gtip
 - **Email** – to planning.policy@rochford.gov.uk
 - **Post** – by sending a completed response form to **Strategic Planning, Rochford District Council, Council Offices, South Street, Rochford, Essex SS4 1BW**
- 1.5 All representations must be accompanied by a name, address and, if applicable, email address. The Council cannot accept anonymous representations.
- 1.6 The Council will also not accept representations that are of an abusive, discriminatory or defamatory nature and any such representations received will be rejected.

- 1.7 All comments accepted as duly-made will be logged on the Council's online public consultation system and will be available to view at the earliest opportunity.
- 1.8 The Council will seek to engage with local communities, businesses and other consultees throughout this consultation in accordance with its *Statement of Community Involvement* (SCI). The SCI 2016, available on the Council website, sets out the ways in which it will publicise the consultation opportunity and manage the consultation itself.
- 1.9 Following the consultation, the Council will consider any representations received and use these to inform its subsequent approach to planning for Gypsy and Traveller accommodation needs. The Council intends to publish a 'Feedback Report' in due course to summarise and provide an initial response to the issues, opportunities and comments raised through this consultation.

2 Policy Context

National Policy and Legislative Context

- 2.1 The Housing Act 2004, as amended by the Housing and Planning Act 2016, requires local authorities to include Gypsy and Traveller needs in their accommodation assessments, and to prepare a strategy in respect of meeting such accommodation needs as part of their overall housing strategy.
- 2.2 Furthermore, the National Planning Policy Framework (NPPF) 2018 requires local planning authorities to assess the size, type and tenure of housing needed for different groups in the community, and reflect these in planning policies (including, inter alia, Gypsy and Traveller needs).
- 2.3 The Government issued a specific Planning Policy for Traveller Sites (PPTS) document in 2015, which expands upon the NPPF and provides specific guidance on planning for Gypsy and Traveller sites.
- 2.4 The PPTS included a revised definition of a Gypsy or Traveller for planning purposes, as copied below:

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.

- 2.5 The PPTS also included a definition of Travelling Showpeople for planning purposes, as follows:

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.

- 2.6 These new definitions mean that some individuals who may previously have been identified as a member of the Gypsy or Traveller, or Travelling Showpeople, community, but who no longer travel permanently, are excluded from the definition for planning purposes. This means that these individuals will no longer need to be considered as part of any assessment into Gypsy, Traveller or Travelling Showpeople accommodation needs; local authorities are still required to consider the housing needs of these individuals as part of their overall housing strategy.
- 2.7 Paragraph 4 of the PPTS sets out the Government's aims in respect of planning for (Gypsy and) Traveller sites, these being:
- that local planning authorities should make their own assessment of need for the purposes of planning;

- to ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites;
- to encourage local planning authorities to plan for sites over a reasonable timescale;
- that plan-making and decision-taking should protect Green Belt from inappropriate development;
- to promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites;
- that plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective;
- for local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies;
- to increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply;
- to reduce tensions between settled and traveller communities in plan-making and planning decisions;
- to enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure; and
- for local planning authorities to have due regard to the protection of local amenity and local environment.

2.8 Paragraph 9 of the PPTS further states that local planning authorities should set pitch targets for gypsies and travellers as defined in Annex 1 (of the PPTS) and plot targets for travelling showpeople as defined in Annex 1, which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities.

2.9 Specifically, local planning authorities should, in producing their Local Plans:

- identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets;
- identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15;
- consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area

(local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries);

- relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density; and
- protect local amenity and environment.

2.10 The PPTS requires local planning authorities to utilise criteria-based policies to guide land supply allocations and to provide a basis for decisions where applications come forward. Such policies should be fair and facilitate the traditional and nomadic life of travellers, while respecting the interests of the settled community.

2.11 In seeking to guide the spatial delivery of Gypsy and Traveller sites, local planning authorities should ensure such sites are sustainable economically, socially and environmentally. In general, sites should:

- promote peaceful and integrated co-existence between the site and the local community;
- promote, in collaboration with commissioners of health services, access to appropriate health services;
- ensure that children can attend school on a regular basis;
- provide a settled base that reduces both the need for long-distance travelling and possible environmental damage caused by unauthorised encampment;
- provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers that may locate there or on others as a result of new development;
- avoid placing undue pressure on local infrastructure and services;
- not be located in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans; and
- reflect the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability.

2.12 Gypsy and Traveller communities are protected against race discrimination under the Equality Act 2010. The Council has a responsibility under the Public Sector Equality Duty provisions of the Act to ensure that its actions help to eliminate unlawful discrimination, harassment and victimisation, advance equality of opportunity between those who share a protected characteristic and those that do not, and foster good relations between people who share a protected characteristic and those that do not. The Council must ensure that its approach to planning for Gypsy and Traveller needs acknowledges, upholds and protects the provisions of the Equality Act and the Public Sector Equality Duty.

Local Policy Context

- 2.13 The Council's current local development plan comprises a suite of documents, including a *Core Strategy* 2011, *Development Management Plan* 2014, *Allocations Plan* 2014 and four area action plans. These set the overarching vision and planning policies for the District up to 2025.
- 2.14 Policy H7 of the *Core Strategy* sets out the Council's overarching policy towards Gypsy and Traveller accommodation, as set out below.

Policy H7 – Gypsy and Traveller Accommodation

The Council will allocate 15 pitches by 2018, as per the East of England Regional Assembly's single-issue review.

In allocating pitches the Council will examine the potential of current unauthorised sites to meet this need and will consider granting them planning consent subject to advice in *Circular 1/2006 – Planning for Gypsy and Traveller Caravan Sites*. Sites will be allocated in the west of the District, where transport links and access to services are better. In allocating sites consideration will include:

- The promotion of peaceful and integrated co-existence between the site and the local community;
- The wider benefits of easier access to GP and other health services;
- Children attending school on a regular basis;
- The provision of a settled base that reduces the need for long-distance travelling and possible environmental damage caused by unauthorised encampment on alternative sites; and
- The need to direct sites away from areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans

- 2.15 In response to Policy H7, and its commitment to allocate sufficient land to meet identified needs for 15 pitches by 2018, Policy GT1 of the *Allocations Plan* allocated a 1 hectare plot of land at Michelins Farm for Gypsy and Traveller accommodation.
- 2.16 This policy further sets out the specific requirements and expectations for the delivery of the site, including design principles, site layout, decontamination requirements and landscape and boundary treatments.
- 2.17 As of October 2018, Michelins Farm is yet to be delivered or be subject to a planning application. Its lack of delivery to date has impinged on the Council's ability to demonstrate a sufficient five-year supply of pitches, and has contributed, in part, to two recent allowed appeal decisions, despite harm to the Green Belt being identified in both cases. These issues will be expanded upon later in this Paper.
- 2.18 The Council has now commenced work on preparing a new Local Plan for the District. In late 2017 / early 2018, the Council held a Regulation 18 consultation ('the Issues and Options consultation'), which set out the broad opportunities and challenges

facing the District over the next 20 years, including those related to planning for Gypsy and Traveller accommodation.

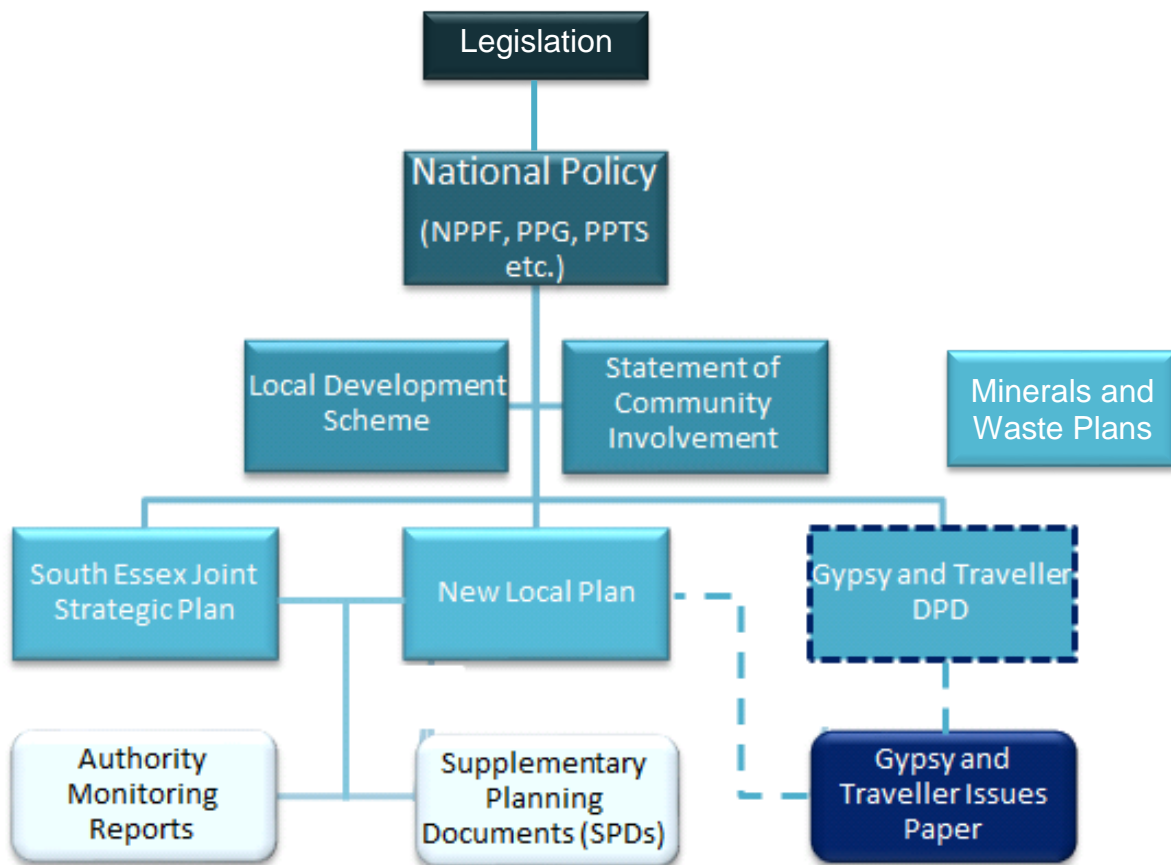
- 2.19 The Council's latest Local Development Scheme (LDS) sets the timetable for the preparation of a new Local Plan, including a further Preferred Options consultation in October 2019, followed by the drafting of a submission Local Plan in 2020/2021.
- 2.20 Concurrently, in January 2018, the Council was a co-signatory (along with Basildon Borough Council, Brentwood Borough Council, Castle Point Borough Council, Southend-on-Sea Borough Council, Thurrock Council and Essex County Council) to a Memorandum of Understanding establishing the Association of South Essex Local Authorities (ASELA), and a commitment to joint planning and place-making across South Essex. The Council has also committed to the preparation of a South Essex Joint Strategic Plan (JSP) in partnership with the other South Essex authorities. The South Essex JSP is likely to consider strategic issues relating to various forms of accommodation across South Essex, and is expected to undergo initial public consultation in 2019.
- 2.21 Due to concerns over the deliverability of Policy GT1, the Council takes the view that it would be prudent to review its approach to Gypsy and Traveller accommodation in advance of the adoption of either Plan, and to prepare a standalone *Gypsy and Traveller Issues Paper* to consider how best to plan for identified Gypsy and Traveller needs in detail. Depending on the outcomes of this consultation and the progress of other development plan documents, the Council will use the Issues Paper to inform its emerging Local Plan, and may decide to prepare a standalone Gypsy and Traveller Development Plan Document.

Other Council Commitments and Projects

- 2.22 The Council is a member of the Essex Planning Officers Association (EPOA) which consists of twelve local authorities across Essex. The role of the group is to provide a forum for the discussion of strategic issues and to pursue projects that are of joint interest and significance. Essex-wide Gypsy, Traveller and Travelling Showpeople Accommodation Assessments (GTAAAs) were commissioned on behalf of the EPOA in 2017. The EPOA is also to establish a task-and-finish group to consider the following the issues:
- Establishing a protocol for unmet Gypsy and Traveller needs;
 - Assessing potential transit sites; and
 - Preparing design guidance for Gypsy and Traveller sites.
- 2.23 The Council is also a partner in the Essex Countywide Traveller Unit (ECTU). The role of ECTU is to provide a consistent, joined-up service to Gypsy and Traveller communities, and to help address issues being experienced by these communities including healthcare, education and accessing key services including fire safety. The

ECTU leads on taking action against unauthorised encampments. Further information on the ECTU is available at this [link](#)¹:

Figure 1: Local Development Plan Structure



Question 1

Do you have any comments to make relating to the national or local planning context?

¹ <http://www.essex.gov.uk/Environment%20Planning/Environment/local-environment/Gypsy-Traveller-Services/Pages/Gypsy-Traveller-Services.aspx>

3 Evidence Context

Gypsy, Traveller and Travelling Showpeople Assessments (GTAA's)

- 3.1 As required by the Housing Act 2004, as amended by the Housing and Planning Act 2016, and expanded upon in the NPPF and PPTS, the Council is required to undertake assessments of Gypsy and Traveller accommodation needs to inform its overall housing strategy and strategic planning policies. Furthermore, national policy requires local planning authorities to identify and provide for a five-year supply of such accommodation alongside traditional market and affordable homes.
- 3.2 In line with these requirements, the Council, alongside other local authorities across Essex, jointly commissioned Opinion Research Services (ORS) in 2017 to undertake a Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA). The purpose of this GTAA was to provide a robust assessment of current and future needs for Gypsy, Traveller and Travelling Showpeople accommodation for each authority across the period 2016 to 2033.
- 3.3 In January 2019, this was supplemented by the South Essex GTAA Update which took account of changes in demand and supply and provided an assessment of need over an extended period, up to 2038, to align with the South Essex authorities' emerging plan periods.
- 3.4 The South Essex GTAA Update (SEGTAU) 2019 identified a total of 423 Gypsy and Traveller pitches across 156 sites, of which 24 pitches across 14 sites fall within Rochford District. No travelling showpeople plots or yards were identified within Rochford District. Figure 2 below sets out the current supply figures for each South Essex authority.

Figure 2: South Essex Gypsy and Traveller Pitch Supply

Local Authority	Gypsies and Travellers		Travelling Showpeople	
	Sites	Pitches	Yards	Plots
Basildon	102	206	1	2
Brentwood	20	55	0	0
Castle Point	2	7	0	0
Rochford	14	24	0	0
<i>Of which authorised</i>	7	9	0	0
<i>Of which temporary</i>	2	2	0	0
<i>Of which unauthorised</i>	5	13	0	0
Southend-on-Sea	0	0	0	0
Thurrock	18	131	2	8
Thurrock - Buckles Lane	0	0	12	109
TOTAL – SOUTH ESSEX	156	423	15	119

- 3.5 The SEGTA 2019 identifies a need for **18 additional pitches in the District for those travellers considered to meet the planning definition**; this comprises five existing unauthorised pitches, 1 temporary pitch, two concealed or doubled-up households, 5 teenagers likely to need their own pitch in the next five years and a new household formation of 5 pitches.
- 3.6 The assessment further identifies a need for **3 additional pitches for unknown households**; this comprises one existing unauthorised pitch, 1 temporary pitch and a new household formation of one pitch.
- 3.7 It also identifies a need for **11 additional pitches for households who do not meet the planning definition**; this comprises seven unauthorised pitches, 1 concealed or doubled-up household, and a new household formation of three pitches. As a result of the change in definition, the Council will no longer be required to plan for pitches for those householders that do not meet the planning definition of a traveller. However, the Council will still need to consider the housing needs of those households who do not meet the planning definition of a Traveller as part of its overall housing strategy.

Figure 3: Rochford District Gypsy and Traveller Pitch Needs, 2016-2038

Status	Total
Meet Planning Definition	18
Unknown	3 (25% = 1)
Do Not Meet Planning Definition	11

- 3.8 The SEGTA 2019 identifies the greatest need for Gypsy and Traveller pitches to fall between 2016 and 2021; by comparison, the need for pitches is relatively low between 2021 and 2038.

Figure 4: Rochford District Gypsy and Traveller Pitch Need Trajectory, 2016-2038

Status	Years					Total
	0-5	6-10	11-15	16-20	21-22	
	2016-21	2021-26	2026-31	2031-36	2036-38	
Meet Planning Definition	14	1	1	1	1	18
Unknown	2	0	1	0	0	3
Do not meet Planning Definition	9	0	1	1	0	11

- 3.9 The SEGTA 2019 identifies a need for **zero additional Travelling Showpeople plots in the District to 2038**.

Question 2

Do you have any comments to make relating to the South Essex Gypsy and Traveller Accommodation Assessment 2019?

Strategic Housing and Employment Land Availability Assessment 2017

- 3.10 In late 2017, the Council prepared a Strategic Housing and Employment Land Availability Assessment (SHELAA); this SHELAA formed a technical study which assessed the potential availability, suitability and achievability of land in the District for meeting identified needs for new homes and jobs. As part of this assessment, the Council also chose to consider the availability, suitability and achievability of land in the District to meet identified needs for Gypsy and Traveller accommodation.
- 3.11 The SHELAA was prepared in accordance with a prescribed methodology set out in Planning Practice Guidance (PPG). The PPG provides specific guidance on the undertaking of a SHELAA, setting out three key objectives of the assessment:
- To identify sites and broad locations with potential for development;
 - To assess the development potential of these sites and broad locations; and
 - To assess each site's suitability for development, and the likelihood of development coming forward ('suitability', 'availability' and 'achievability')
- 3.12 11 sites were identified as being potentially available for Gypsy and Traveller accommodation, of which one comprised the existing allocation, Policy GT1 – Michelins Farm; 5 sites were new submissions received through the 'Call for Sites' and five were existing unauthorised sites.
- 3.13 The suitability of these sites was assessed on the basis of defined criteria developed in accordance with the PPTS; this considered the sustainability of their location (i.e. its proximity to services, facilities and the strategic highway network) and the presence of any policy-based, physical and environmental constraints (e.g. flood risk, topography, proximity to designated environmental sites, and relationship with the Metropolitan Green Belt and areas of defined landscape value).
- 3.14 The SHELAA concluded that only one site, Policy GT1 – Michelins Farm, was likely to be deliverable for Gypsy and Traveller accommodation. The remaining 10 sites were all considered to be undeliverable on the basis that they fell within the Metropolitan Green Belt, where such development would typically be considered definitionally inappropriate. The Council did not, however, seek to assess in detail the impact that Gypsy and Traveller accommodation on each site would have on the principles of the Green Belt, as, at that time, it lacked the evidence base to robustly do so. The Council has now committed to a comprehensive review of its Green Belt boundaries, through a Green Belt assessment, which will help to inform future assessments into the suitability of sites for Gypsy and Traveller accommodation.
- 3.15 The Council has also committed to update the SHELAA, which will seek to assess the availability, suitability and achievability of both previously identified sites and newly

identified sites for potential Gypsy and Traveller accommodation. The outcomes of this Issues Paper consultation will help to inform this SHELAA update, including in setting criteria for assessing the suitability of sites.

Question 3

Do you have any comments to make relating to the findings of the Strategic Housing and Employment Land Availability Assessment 2017?

Sustainability Appraisal

- 3.16 The Planning and Compulsory Purchase Act 2004 requires Local Plans to be accompanied by a *Sustainability Appraisal* (SA), incorporating the requirements of Environmental Assessment of Plans and Programmes Regulations 2004 and, if needed, the Conservation of Habitats and Species Regulations 2010, as amended.
- 3.17 As this Gypsy and Traveller Issues Paper forms a component of the Local Plan, it is accompanied by a *Draft Sustainability Appraisal* (SA) which assesses how potential options for meeting the accommodation needs of Gypsy and Traveller households would contribute to the achievement of sustainable development, including any economic, environmental and social impacts.
- 3.18 Interested parties are encouraged to read this Issues Paper in conjunction with the accompanying *Sustainability Appraisal*

Question 4

Do you have any comments to make relating to the accompanying Sustainability Appraisal?

4 Issues and Options Document Consultation

- 4.1 Between December 2017 and March 2018, the Council held a Regulation 18 consultation on the first stage of its new Local Plan, the Issues and Options Document.
- 4.2 A section of the consultation document focussed on Gypsy, Traveller and Travelling Showpeople accommodation, presenting identified challenges and opportunities as they relate to planning for such accommodation over the next 20 years. Respondents were encouraged to support, object or comment on paragraphs within the section as part of the wider consultation.
- 4.3 The Gypsy and Traveller community is an identified 'harder to reach' group, and are often underrepresented in formal consultation processes, and the Council took additional steps to help engage these communities as part of the consultation. This included hand-delivering a letter to all known Gypsy and/or Travelling households within the District and an offer of support to help those who wished to make a representation understand the consultation and communicate their views.
- 4.4 A number of possible options for future policy were presented as part of this consultation. These are copied below as part of Figure 5.

Figure 5: Tables of Options, Rochford District Council New Local Plan Issues and Options Document 2017

Option	Justification
A. Retain the current criteria-based policy (<i>Core Strategy</i> 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 (<i>Allocations Plan</i> policy GT1)	This site could meet the needs of the majority of households that were identified in the Rochford District element of the <i>GTAA 2017</i> 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 <i>PPTS</i> .
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.
	An alternative to providing for all households on the allocated sites is to develop a specific criteria-based policy and

D. Consider a mobile home policy for those no longer falling within the Gypsy and Traveller definition	allocation for those which do not meet the definition of a Gypsy and Traveller in the <i>PPTS</i> .
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 <i>GTAA 2017</i> – 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 <i>GTAA</i>) 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 examination.

4.5 In total, 25 representations were received on this section of the consultation document. The main points raised by these representations are summarised in Figure 6 below.

Figure 6: Summary Table of Representations, Rochford District Council New Local Plan Issues and Options Document 2017

<ul style="list-style-type: none"> • Pitches should be acknowledged as a highly vulnerable use in flood risk areas. If users of pitches are residents rather than holiday makers, consideration should be given to the fact that they may have no alternative place of residence in the event of flood. • General support for Option B – the retaining of Policy GT1: Michelins Farm • Support for a publically managed site, including directly by Rochford District Council • Paragraph 6.74 states unauthorised sites are pursued through enforcement powers however in the case of Cherry Hill site on the A1245 there is no evidence of this • Some objection to public funds being used to provide such sites • RDC should carry out further work to assess its Gypsy, Traveller and Travelling Showpeople needs between 2033 and 2037
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- The Rochford Local Plan should be updated to meet Rochford's full needs for Gypsy, Traveller and Travelling Showpeople
- Acknowledgement should be made of the fact there may be unmet need for Gypsy, Traveller and Travelling Showpeople accommodation from other Essex authorities
- RDC should acknowledge and support development of protocol for addressing unmet need across Essex
- Policy approach should take account of the transit recommendations within the Essex Gypsy and Traveller Accommodation Assessment
- Concerns raised about the impact of providing Gypsy, Traveller or Travelling Showpeople sites on settled communities

4.6 These previous representations will be used alongside any representations received to this Issues Paper to inform the Council's approach to meeting the accommodation needs of Gypsy and Traveller communities within the District.

5 Identifying a Sufficient Supply of Sites

Introduction

Current Context

- 5.1 The Council's current policy approach to meeting identified needs for Gypsy and Traveller accommodation comprises Policy GT1, the allocation of Michelins Farm, to provide 15 pitches. This allocation was commensurate with a single-issue review of needs prepared in 2009.
- 5.2 In practice, the delivery of the site has been challenging for a number of reasons, including prohibitive site acquisition costs, lack of interest shown from the traveller community in acquiring the site, a potential conflict with emerging business uses on the remainder of the site and the impacts of proposed highway improvements at the nearby Fairglen interchange. No planning applications for Gypsy and Traveller accommodation have been received to date. As a result, and on the basis there are no other known, alternative sites available for such development nor any public sites currently available for occupation, two recent planning appeals (*APP/B1550/C/16/3162651* & *APP/B1550/W/17/3174424*) have been allowed on Green Belt sites.
- 5.3 In both cases, Inspectors acknowledged that the adopted policies of the Council were failing to deliver accommodation within the identified timescales and that the nature of Policy GT1 was, albeit pre-dating it, not now in conformity with the Planning Policy for Traveller Sites (PPTS) 2015. Key concerns raised included the likelihood of any pitches ever being delivered on site GT1, whether GT1 could meet the latest needs assessment, and a lack of opportunity for choice to further the government's aim to promote more private site provision. Whilst significant weight was given to the fact that Gypsy and Traveller accommodation would generally be considered inappropriate development in the Green Belt, it was determined that other factors, including the lack of alternative sites, constituted very special circumstances in respect to the NPPF and the PPTS.
- 5.4 The Planning Policy for Traveller Sites (PPTS) places a clear obligation on local planning authorities to:
- identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets; and
 - identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15;
- 5.5 One of the primary objectives of this Issues Paper is to consider whether a new approach to meeting Gypsy and Traveller needs is required to conform to the PPTS and other statutory duties.

Current Supply

- 5.6 The South Essex Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (SEGTA) 2019 found the District to contain 7 permanently authorised sites with a total of nine pitches.
- 5.7 In addition, there are 2 temporarily authorised sites with a total of two pitches and 5 unauthorised sites with a total of thirteen pitches, however these sites cannot be considered to constitute part of the District's permanent supply.

Current Demand

- 5.8 By 2038, the SEGTA 2019 identifies a need for 18 additional pitches for households meeting the PPTS definition of a Traveller, with a further 3 pitches for unknown households. The Council also has an obligation to meet the housing needs of 11 households who do not meet the PPTS definition of a Traveller.
- 5.9 Of the need for 21 pitches, 14 additional pitches are required by 2021, with one additional pitch between 2021 and 2026, an additional two pitches between 2026 and 2031, one additional pitch between 2031 and 2036 and one additional pitch between 2036 and 2038.

Appraisal Criteria

- 5.10 The Council's existing Policy H7 is a criteria-based policy that was written in accordance with the now-withdrawn Circular 1/2006 – Planning for Gypsy and Traveller Caravan Sites, and predates the NPPF (2012) and the PPTS (2015). The policy requires consideration of:
- The promotion of peaceful and integrated co-existence between the site and local community;
 - Wider benefits of easier access to GP and other health services;
 - Children attending school on a regular basis;
 - The provision of a settled base that reduces the need for long-distance travelling and possible environmental damage caused by unauthorised encampment on alternative sites; and
 - The need to direct sites away from areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans.
- 5.11 The PPTS requires local planning authorities to ensure (Gypsy and) Traveller sites are sustainable economically, socially and environmentally. In doing so, criteria should be set to guide land supply allocations where there is identified need. Criteria-based policies should be fair and should facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community.

5.12 The PPTS further requires that policies:

- a. promote peaceful and integrated co-existence between the site and the local community;
- b. promote, in collaboration with commissioners of health services, access to appropriate health services;
- c. ensure that children can attend school on a regular basis;
- d. provide a settled base that reduces both the need for long-distance travelling and possible environmental damage caused by unauthorised encampment;
- e. provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers that may locate there or on others as a result of new development;
- f. avoid placing undue pressure on local infrastructure and services;
- g. do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans; and
- h. reflect the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability.

5.13 Set out below are a list of criteria which might be included in a new criteria-based policy or assessment. These criteria could be used to inform a site selection process for potential allocations through the Local Development Plan, as well as forming the basis for a new criteria-based policy in any subsequent Development Plan Document. A criteria-based policy would allow the Council to assess, at a later date, the suitability of any sites to which applications are received.

Proximity to Basic Services

PPTS Policy B – Parts (a), (b), (c), (d), (f) and (h) & Policy C

- 5.14 In line with the PPTS, sites for Gypsy and Traveller accommodation should be sustainable economically, socially and environmentally. One aspect of this sustainability should be the ability of households inhabiting a site to access basic facilities such as schools, health services, employment opportunities, shops and other local services.
- 5.15 Sites have historically been developed in more sparsely populated, rural parts of the District and often have a poorer level of access to basic services than the settled community. The causes of this pattern of development have been the combined result of a national policy directive to deliver more pitches through private ownership and a preference from some households in the Gypsy and Traveller community for sites to be isolated from the settled community.

- 5.16 Notwithstanding the above, the District has a large rural population and those living in rural areas still generally benefit from good access to the basic services and facilities provided by the established urban settlements.
- 5.17 A criteria-based policy should give weight to the ability of households inhabiting that site to access basic services and the accessibility of the site using sustainable travel, however it is not considered appropriate to have a general presumption against locating sites in rural areas given that rural lifestyles can still be socially, environmentally and economically sustainable.
- 5.18 Acknowledgement should be given to the personal preference of some members of the Gypsy and Traveller community to be sited with a degree of separation from settled communities. Historically the respective lifestyles of both communities have not always been compatible and have led to conflict. Whilst the role of policy should be to promote greater access, inclusivity and cohesion between communities, it should also be recognised that households from both the Gypsy and Traveller community and the settled community may prefer to be sited with a degree of separation for lifestyle reasons. The criteria-based policy may therefore need to avoid being overly prescriptive in requiring sites to be located within or immediately adjacent to settled communities.

Question 5

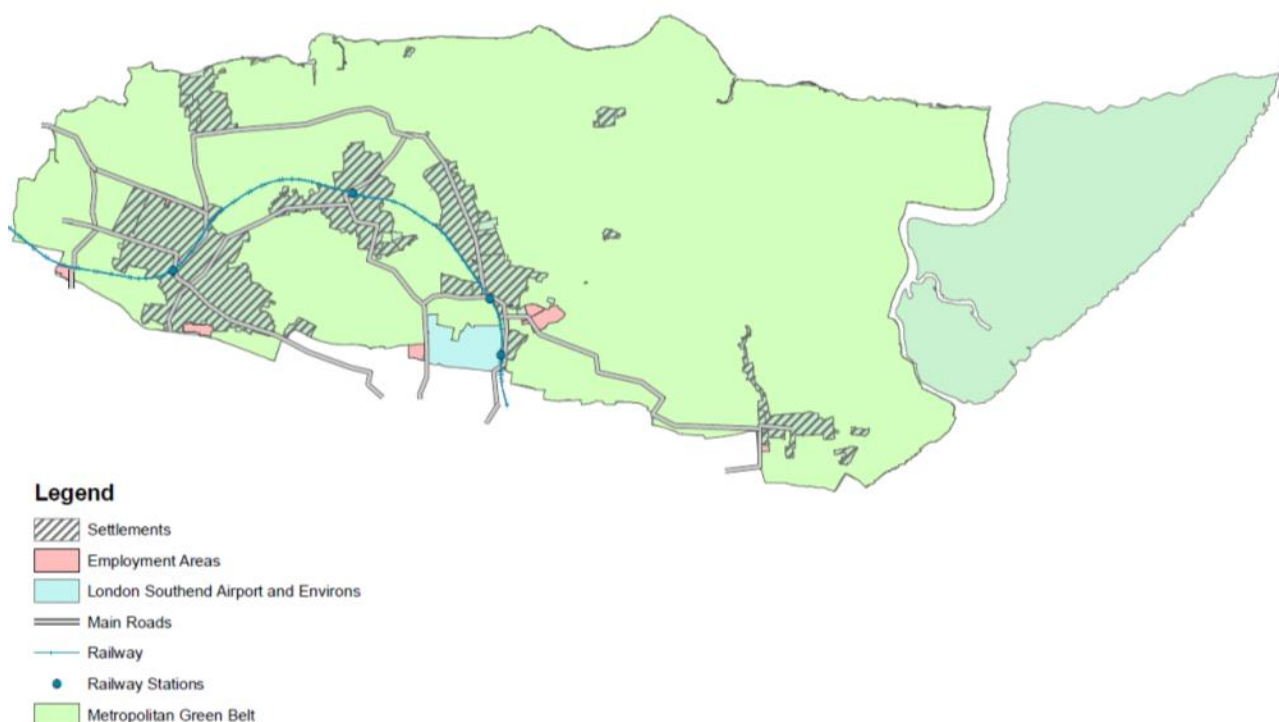
Do you consider that the proximity of a site to basic services should be included within any site suitability criteria?

Do you have any additional comments, suggestions or concerns relating to the identified issues?

Green Belt**PPTS Policy B - Parts (d) and (e); & Policy E**

- 5.19 The NPPF is clear that the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.
- 5.20 The NPPF defines five purposes for Green Belts:
- a) to check the unrestricted sprawl of large built-up areas;
 - b) to prevent neighbouring towns merging into one another;
 - c) to assist in safeguarding the countryside from encroachment;
 - d) to preserve the setting and special character of historic towns; and

- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 5.21 The development of Gypsy and Traveller pitches within the Green Belt is defined in both the NPPF and PPTS as inappropriate. The PPTS is clear that personal circumstances and unmet need are unlikely to clearly outweigh harm to the Green Belt as to establish very special circumstances, except in cases where the best interests of a child are concerned.
- 5.22 The NPPF does make some allowance for development on previously developed land within the Green Belt. These are areas of land which are or were occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure, subject to some exclusions including agricultural land, parks and allotments. The NPPF advises that limited infilling or redevelopment of such land is not inappropriate development in the Green Belt where the development would have no greater impact on the openness of the Green Belt.
- 5.23 The PPTS does clarify, however, that if a local planning authority wishes to make an exceptional, limited alteration to the defined Green Belt boundary – such as to allocate land for a (Gypsy or) Traveller site – it should only do so through a plan-making process. In this case, it should be specifically allocated in the development plan as a traveller site only.
- 5.24 It must be acknowledged that the vast majority of the undeveloped land in the District is designated as part of the Metropolitan Green Belt. It is therefore not clear that the accommodation needs of Gypsy and Traveller communities can be wholly and comprehensively met outside of the Green Belt. This fact has been acknowledged in a recent appeal decision (APP/B1550/C/16/3162651) in which the Inspector concluded



‘that further sites will need to be found and, having regard to the nature of the District, within the Green Belt.’

- 5.25 Rochford has a large rural population, and consequently, the Green Belt within Rochford is not all open or undeveloped. Given the large number of agricultural buildings, dwellings and other ancillary buildings and structures, a significant proportion of the District’s Green Belt is, in reality, characterised by significant amounts of built development and a lack of visual openness. As a result, a realistic approach will be needed to assessing the actual harm that any Gypsy and Traveller site would have on the openness or character of that area. The Council has jointly commissioned a Green Belt Study to form a comprehensive assessment of the District’s Green Belt against the five purposes set out in the NPPF. This Study will provide a bank of evidence to allow the Council to appraise the contribution that potential development sites make to the objectives of Green Belt policy, and if applicable, any harm that their development would have on those objectives.
- 5.26 It is accepted that a criteria-based assessment or policy must acknowledge national policy that Gypsy and Traveller development is definitionally inappropriate in the Green Belt. However, there is little, if any, likelihood of the accommodation needs being met on non-Green Belt sites. Where the Council considers locating sites within the Green Belt to be appropriate, it should assess the contribution of potential sites to the purposes set out in the NPPF, and apportion appropriate weight to competing factors, including the extent of unmet need. In doing so, the Council may use the findings of the Green Belt Study to the extent that is proportionate to the site in question. Any policy should also prioritise the use of previously developed land.
- 5.27 When assessing the impact of a potential site on the Green Belt, it will be important to consider the extent of built development in that area – including its existing degree of openness or character – and whether the potential site, if developed, would have any substantive impact on the openness or character of that area.

Question 6

Do you consider that impact on the Green Belt should be included within any site suitability criteria?

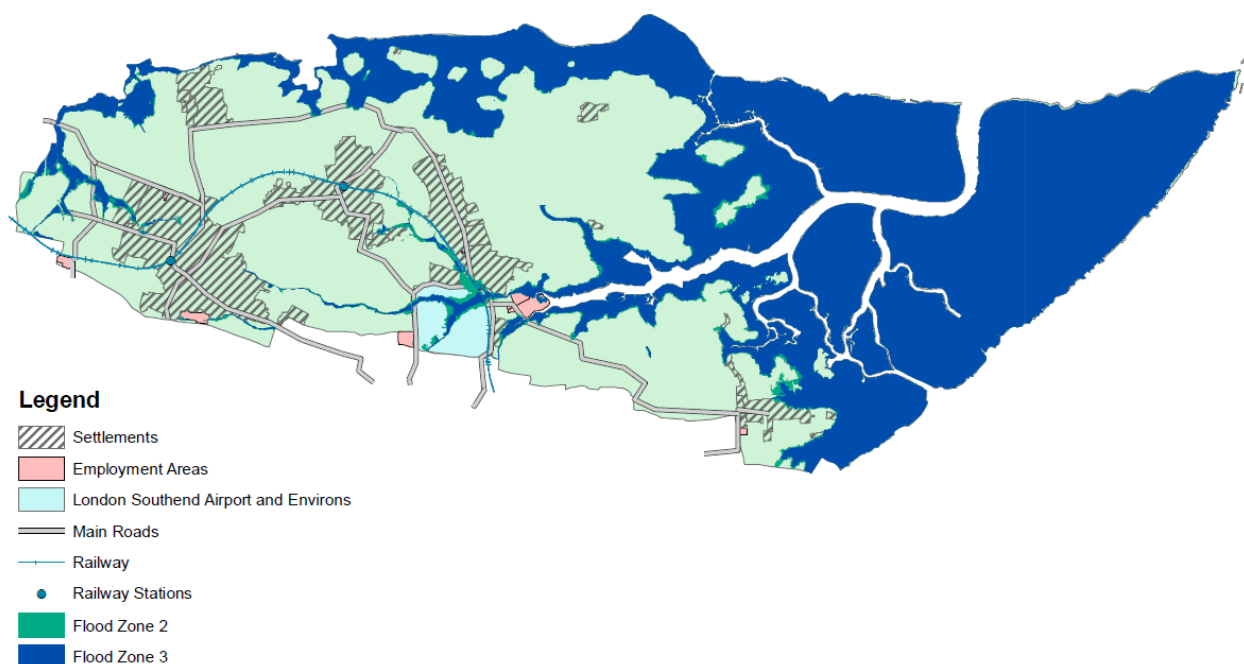
Do you have any additional comments, suggestions or concerns on the identified issues?

Flood Risk

PPTS Policy B – Part (g)

- 5.28 It is recognised that Gypsy and Traveller accommodation will most often take the form of caravans and/or mobile homes. Caravans and mobile homes are defined in the Planning Practice Guidance (PPG) 2014 as a “highly vulnerable use” in flood risk terms. The PPG is clear that highly vulnerable uses should not be permitted in Flood Zone 3a or 3b, as defined by Environment Agency mapping, and that in the case of sites falling within Flood Zone 2, a Sequential and Exceptions test will be required.

- 5.29 Gypsy and Traveller accommodation should be considered an appropriate use in Flood Zone 1.
- 5.30 Any criteria-based assessment or policy should consider proposed Gypsy and Traveller pitches falling within Flood Zone 1 to be appropriate in flood risk terms. Where pitches would fall within Flood Zone 2, any assessment or policy will require the undertaking of a Sequential Test, and if needed, the Exceptions Test, as set out in the NPPF and PPG. Where pitches would fall within Flood Zone 3a or 3b, any assessment or policy should consider such uses to be inappropriate in all cases.



- 5.31 It will also be important to ensure that the development of sites is at low risk of flooding from other sources, including surface water, and that appropriate mitigation or management is put in place to off-set any risk such sources would present.
- 5.32 The aim of the sequential test is to steer new development to areas with the lowest risk of flooding. Development should not usually be permitted if there are reasonably available alternative sites appropriate for the proposed development in areas with a lower risk of flooding.
- 5.33 The application of the exception test should be informed by a strategic or site-specific flood risk assessment, depending on whether it is being applied during plan production or at the application stage. For the exception test to be passed it should be demonstrated that:
- a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and

b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

- 5.34 Any applications for Gypsy and Traveller accommodation in Flood Zone 2 or 3 will be expected to be accompanied by a site-specific Flood Risk Assessment.

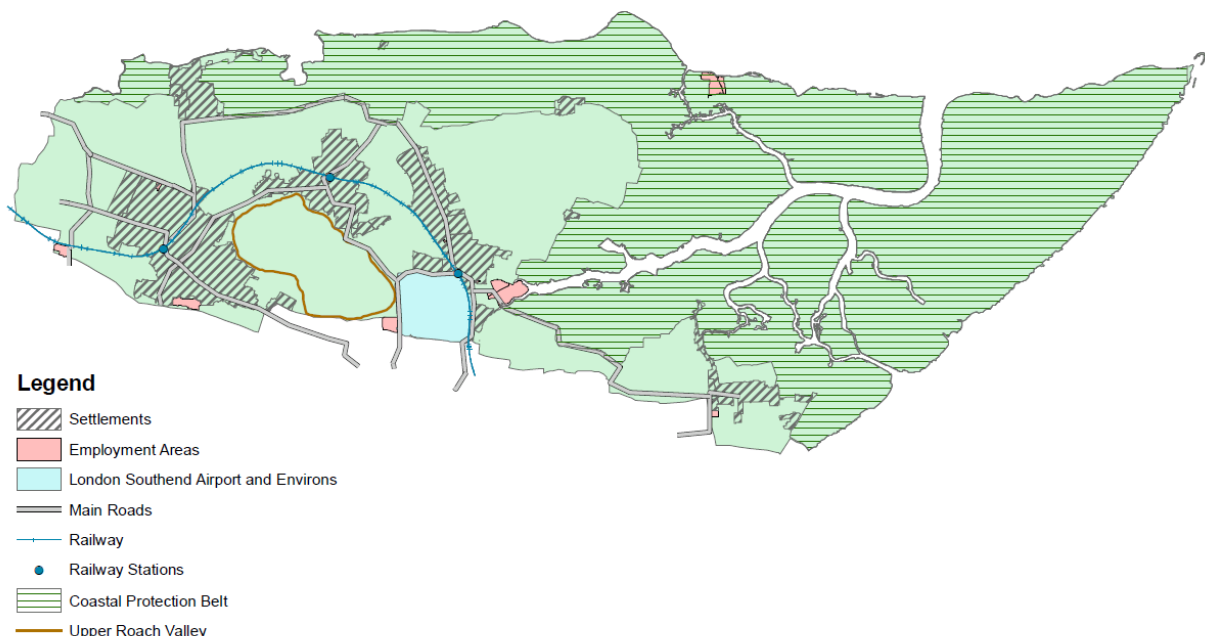
Question 7

Do you consider that flood risk should be included within any site suitability criteria?

Do you have any additional comments, suggestions or concerns on the identified issues?

Landscapes and Visual Impact

- 5.35 The NPPF requires development to be sympathetic to local character and history, including the surrounding built environment and landscape setting. Furthermore, the planning process should protect and enhance valued landscapes and recognise the intrinsic character and beauty of the countryside. Great weight should be given to conserving and enhancing landscapes.
- 5.36 The District is currently home to two identified special landscape areas; the Upper Roach Valley and Coastal Protection Belt.



- 5.37 . Whilst the District is home to areas of desirable landscape quality, no part of the District falls within an Area of Outstanding Natural Beauty (AONB) or a National Park. The development of Gypsy and Traveller pitches may therefore result in an impact on landscape character but it will be important to consider whether this impact is

significant. The addition of built form into the landscape should not be assumed to result in a significant negative impact, given the District's special landscape areas do contain areas of existing built form including caravan parks and holiday homes.

- 5.38 The Council has jointly commissioned a Landscape Character, Sensitivity and Capacity Study to identify and assess areas of landscape character in the District. This Study will provide evidence to inform any assessment of land on the basis of landscape character, including an assessment of the quality of the landscape and the impact any development would have on the identified landscape character.
- 5.39 Any criteria-based assessment or policy should assess the impact that proposed Gypsy and Traveller pitches would have on the character of areas of identified landscape quality, and take into account the impact the development would have on the wider visual amenity of the area. Sites may not be considered appropriate where any identified impact on landscape quality is significant and unable to be mitigated. Preference could be shown to siting new pitches in areas of lower landscape quality and where the visual impact of the development is low or can be appropriately mitigated.

Question 8

Do you consider that impact on landscape and visual amenity should be included within any site suitability criteria?

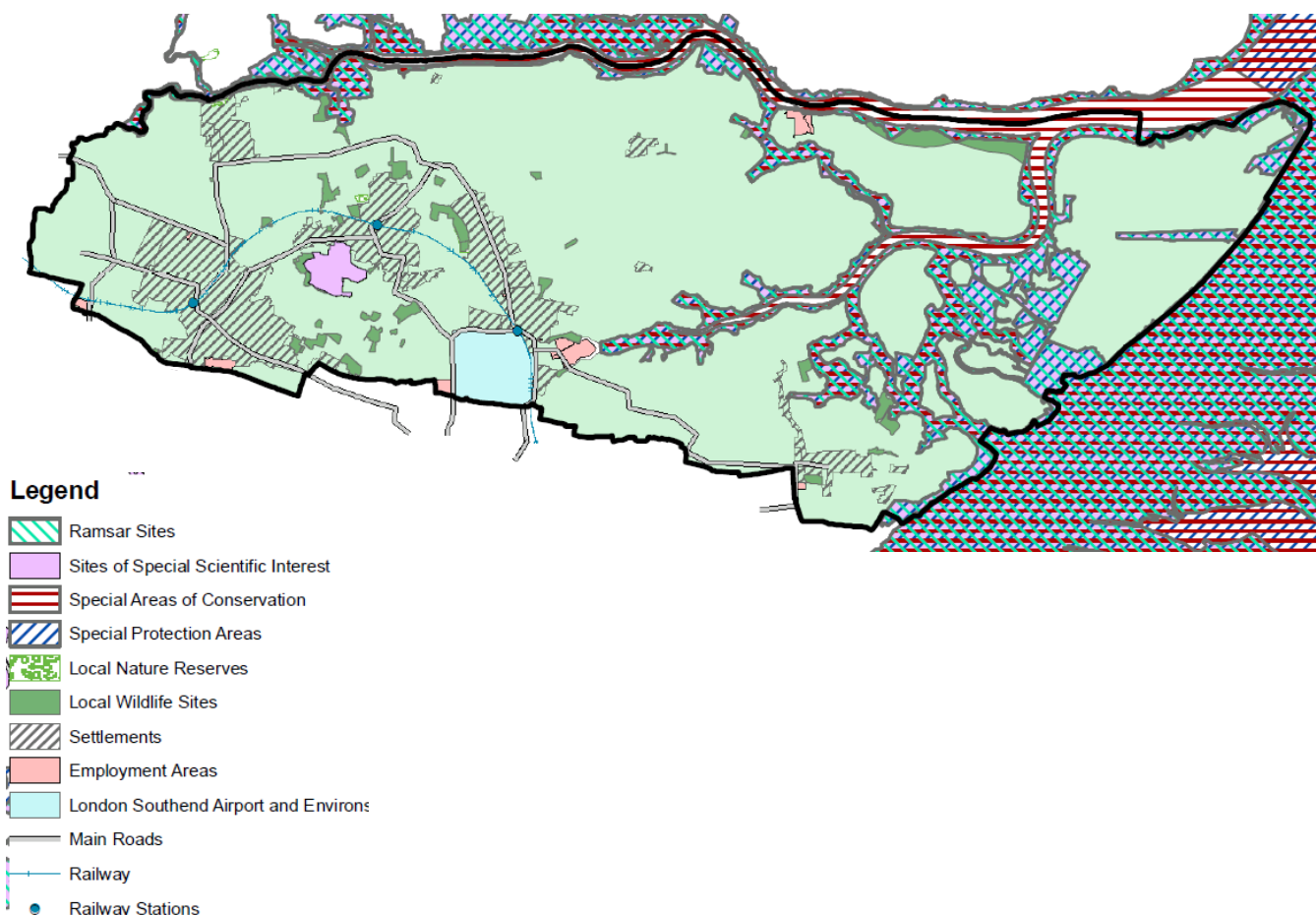
Do you have any additional comments, suggestions or concerns on the identified issues?

Biodiversity and Wildlife

PPTS Policy B – Parts (d) and (e)

- 5.40 The NPPF requires local planning authorities to safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation.

- 5.41 Significant weight should be apportioned to the impact that a proposed site would have, as a result of its location or use, on the hierarchy of international, national and locally designated sites of importance for biodiversity. This will include Special Areas of Conservation (SACs); Special Protection Areas (SPAs); Ramsar Sites; Sites of Special Scientific Interest (SSSIs); Ancient Woodlands; Local, National and International Nature Reserves; Local Wildlife Sites; and other ecologically important habitats.



- 5.42 Any criteria-based assessment or policy should assess the impact that proposed Gypsy and Traveller pitches would have on areas of identified environmental importance, including for biodiversity.
- 5.43 Any criteria-based assessment or policy may consider a potential site to be inappropriate where any of the following criteria apply:
- Where the development would cause significant harm to biodiversity which cannot be avoided, mitigated or compensated;
 - Where the development falls, on or outside a SSSI, and is considered likely to have an adverse effect on it (except where the benefits of a development clearly outweigh its likely impact on the features of the site that make it of special scientific interest and any broader impacts on the national network of SSSIs);

- Where the development would result in the loss or deterioration of irreplaceable habitats (such as ancient woodlands and ancient or veteran trees)

5.44 Sites could generally be considered inappropriate where they would negatively impact or compromise the provision of public open space unless this impact can be demonstrably mitigated or compensated.

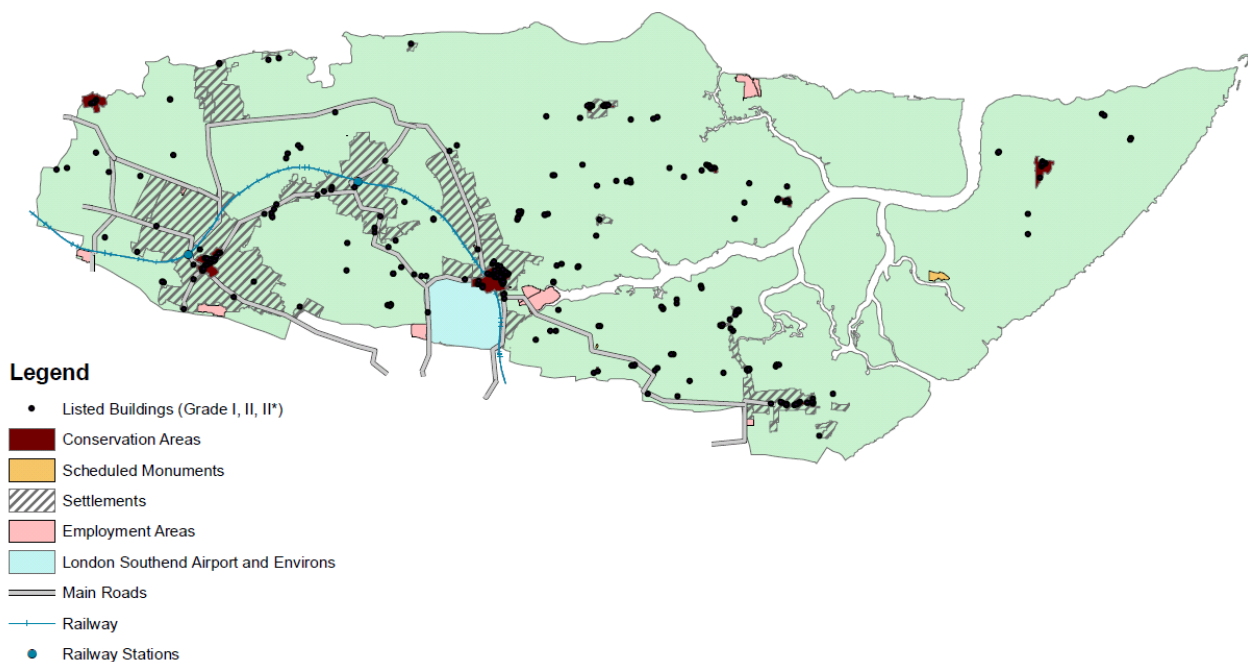
Question 9

Do you agree that impact on biodiversity and wildlife should be included within any site suitability criteria?

Do you have any additional comments, suggestions or concerns on the identified issues?

Heritage Assets

- 5.45 The NPPF requires local planning authorities to identify and assess the significance of any heritage asset that may be affected by a proposal, either directly or by impacting on its setting.
- 5.46 When considering the impact of a proposed site on the significance of a designated heritage asset, great weight should be given to the asset's conservation and the importance of that asset.
- 5.47 The development of a site, including for Gypsy and Traveller accommodation, has the potential to cause harm to heritage assets in several ways, including by detracting from the historic character or significance of an area, by negatively affecting the setting of a heritage asset or by causing direct harm to a heritage asset. The extent to which such harm is substantial will depend on the design and extent of the development, the nature of the heritage asset, and the spatial relationship between the development and the asset.
- 5.48 For the purposes of this assessment, a heritage asset would include Scheduled Monuments, Conservation Areas, Listed Buildings and Locally Listed Buildings.



- 5.49 Sites should generally be considered inappropriate where they would lead to likely substantial harm to (or total loss of significance of) a designated heritage asset, unless it is demonstrated that this substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss.
- 5.50 Where the developing of a site for Gypsy and Traveller accommodation will lead to less-than-substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.
- 5.51 Any criteria-based assessment or policy should consider the impact that developing a site for Gypsy and Traveller accommodation would have on the significance and setting of nearby heritage assets. Preference could be shown to siting new pitches in areas which have lower or no impact on heritage assets, or where any impacts can be appropriately mitigated.

Question 10

Do you agree that impact on heritage assets should be included within any site suitability criteria?

Do you have any additional comments, suggestions or concerns on the identified issues?

Access and Infrastructure

- 5.52 The NPPF requires transport issues to be considered from the earliest stages of plan-making, so that:
- The potential impacts of development on transport networks can be addressed;
 - Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised;
 - Opportunities to promote walking, cycling and public transport use are identified and pursued.
 - The environmental impacts of traffic and transport infrastructure can be identified, assessed and considered – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
 - Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.
- 5.53 The planning system is expected to actively manage patterns of growth in support of these objectives; significant development should be focused in locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.
- 5.54 The PPTS further requires (Gypsy and) Traveller sites to avoid placing undue pressure on local infrastructure and services.
- 5.55 Any criteria-based assessment or policy could consider the adequacy and safety of the highway access, in consultation with Essex County Council as the local highway authority. Sites could generally be preferred where they have good access to existing public transport routes, public footpaths and bridleways in order to ensure opportunities for sustainable travel.
- 5.56 Gypsy and Traveller sites will also require suitable access to utilities, including water, electricity and sewerage. Any criteria-based assessment or policy could consider whether the location of the site would make securing such access difficult or impossible.

Question 11

Do you agree that access and the provision of infrastructure should be included within any site suitability criteria?

Do you have any additional comments, suggestions or concerns on the identified issues?

Amenity and Site Conditions

- 5.57 The NPPF requires local planning authority to plan for healthy, inclusive and safe places which:
- Promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other;
 - Are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion;
 - Enable and support healthy lifestyles, especially where this would address identified local health and well-being needs.
- 5.58 Furthermore, the PPTS requires (Gypsy and) Traveller sites to promote peaceful and integrated co-existence between the site and the local community and to provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any households on the site and any others, as a result of new development.
- 5.59 The PPTS also requires that sites in rural areas do not dominate the nearest settled community.
- 5.60 Any criteria-based assessment or policy should consider the conditions of a proposed site, including any topographical or contamination issues, and the ability of such issues to be satisfactorily addressed. This assessment or policy should also consider whether nearby or neighbouring uses are compatible with the use of the site for Gypsy and Traveller accommodation, and the extent to which unacceptable external impacts, such as noise or air pollution, are likely to occur. Where a site is proposed adjacent to a less compatible use, it will be necessary to consider how any unacceptable external impacts can be avoided and mitigated.
- 5.61 Where a site is proposed within or adjacent to a settled residential area, the criteria-based assessment or policy should consider the impact of the development on the amenity of the households within both the Traveller and settled communities, whilst acknowledging the ability of the development to promote social interaction and cohesion.

Question 12

Do you agree that site conditions and impact on amenity should be included within any site suitability criteria?

Do you have any additional comments, suggestions or concerns on the identified issues?

Options

Options	Commentary
A) Retain the Core Strategy Policy H7 – Gypsy and Traveller Accommodation without amendment	<p>This policy was based on advice contained within the now-withdrawn Circular 1/2006 – Planning for Gypsy and Traveller Caravan Sites and pre-dates the NPPF (2012 and 2018) and PPTS (2015). Whilst the criteria within Policy H7 are considered to still broadly align with national policy, the existing policy does not include reference to all the criteria now included in the NPPF and PPTS.</p> <p>As a result, the Council may not be able to fully assess the suitability of sites in accordance with national policy.</p>
B) Expand or amend Policy H7 to take into account additional suitability criteria	<p>By expanding and amending the policy the Council could ensure that its criteria-based policy more closely aligns with the NPPF and PPTS. These criteria could include reference to;</p> <ul style="list-style-type: none"> • Proximity to Basic Services • Green Belt • Flood Risk • Landscape and Visual Impact • Biodiversity and Wildlife • Heritage Assets • Access and Infrastructure • Amenity and Site Conditions
C) Do not have a separate criteria-based policy and rely on the NPPF and PPTS	<p>The Council could chose not to have a specific criteria-based policy on Gypsy and Traveller accommodation, and instead rely on the broad policies within the NPPF and PPTS.</p> <p>This approach would give the Council less control over the type of development that went ahead however and could be considered contrary to national policy. If the approach was found to be contrary to national policy, it could result in the Council's development plan being found unsound at the examination stage.</p>

Question 13

Which option(s) do you consider to be best for assessing the suitability of sites for Gypsy and Traveller accommodation?

Are there any other options that you feel the Council should consider in assessing the suitability of sites for Gypsy and Traveller accommodation?

Identifying Potential Sites

- 5.62 In addition to establish site suitability criteria, exploring options for meeting identified pitch needs should be informed by an assessment of the availability of sites. For a site to be considered available the landowner must be willing to sell or develop the site for Gypsy or Traveller accommodation. In practice, the Council can become aware of a site's availability in several ways; including by the submission of a planning application or application for Pre-Application advice, or by the submission of the site to the 'Call for Sites' process.
- 5.63 The Council's latest Gypsy and Traveller Accommodation Assessment (SEGTA) 2019 shows the District to require 18 additional pitches for households meeting the definition of a traveller, a further 3 pitches for unknown households and 11 pitches for households not meeting the definition, by 2038. The starting point for the identification of potential sites is that identified needs should be met in full, in line with the PPTS.
- 5.64 The Council commenced its 'Call for Sites' process in 2015 when it first advertised an opportunity for landowners, agents and developers to make the Council aware of any land within the District that they felt could reasonably be made available for future development. Part of this submission process included informing the Council what uses the land would be available for, e.g. market housing, employment uses, or Gypsy and Traveller accommodation. This Call for Sites process helped to inform the preparation of the Strategic Housing and Employment Land Availability Assessment (SHELA) 2017.
- 5.65 The SHELA 2017 identified 11 sites that were available for Gypsy and Traveller accommodation. Of these, one site comprised the existing allocation, Policy GT1 – Michelins Farm; 5 sites were site submissions received through the Call for Sites and five comprised existing occupied but unauthorised sites.
- 5.66 The SHELA 2017 concluded that only Michelins Farm (est. 15 pitches) could be considered to be both suitable and available for development.
- 5.67 However, as mentioned previously, the Council not able to demonstrate a five year supply of pitches, as required by national policy. The latest calculation of need suggests the delivery of 15 pitches through Policy GT1 would, in any event, no longer be sufficient to meet full accommodation needs in the long term. It is therefore necessary to consider whether or not a different approach is required to meeting the needs of Gypsy and Traveller communities.

Identifying potential new sites for allocation

- 5.68 The SEGTA 2019 identifies 7 currently occupied sites without permanent planning permissions, of which two have temporary consents expiring in February 2023 and December 2018 (Pear Tree) respectively; and 5 are unauthorised.

Site Name	Number of Pitches*
Temporary sites	
TRA1: Land south of Woodville, Rayleigh	1
TRA2: Pear Tree, Hockley	1
Unauthorised sites	
TRA3: Land adjacent to Pumping Station, Rawreth	1
TRA4: Land adjacent St Theresa, Canewdon	2
TRA5: Land opposite Witherdens Farm, Rawreth	7
TRA6: Land opposite 2 Goldsmith Drive, Rayleigh	2
TRA7: Meadow View, Rayleigh	1
TOTAL	15

***NB: It is recognised that some sites may have a real capacity that is higher than the number of pitches currently identified**

- 5.69 The Strategic Housing and Employment Land Availability Assessment (SHELAA) 2017 identifies 6 currently undeveloped sites which may be available for Gypsy and Traveller development, of which one comprises the currently allocated site (Policy GT1); and five were received through the Call for Sites process. Whilst the five Call for Sites submissions were not considered to be deliverable when assessed in the SHELAA 2017, a different conclusion could be reached when applying any new site suitability criteria.

Site Name	Number of Pitches
Allocated sites	
TRA8: Policy GT1 – Michelins Farm	15
Call for Sites submissions	
TRA9: 340 – 370 Eastwood Road, Rayleigh	Unknown
TRA10: The Dell, Madrid Avenue, Rayleigh	Unknown
TRA11: Rayleigh Golf Range, Chelmsford Road, Rawreth	Unknown
TRA12: Greenacres, Victor Gardens, Hawkwell	Unknown
TRA13: Tyndol, Chelmsford Road, Rawreth	Unknown
TOTAL	15

- 5.70 The Council could also open up a new, specific Call for Sites exercise to help identify any additional sites that may have become available for Gypsy and Traveller accommodation since the original Call for Sites exercised closed in March 2018. Such an approach would help to ensure the list of possible sites to be assessed was comprehensive and exhaustive.
- 5.71 Maps showing the location and boundaries of each site are provided at Appendix A.

Expansion of Existing Sites

- 5.72 One factor in the growth of pitch needs over time is often demand generated from younger members of a household growing older and requiring their own accommodation. In some cases, it may be possible to accommodate additional pitch needs through an increase in the number of pitches on a site, either through a physical expansion of the site into adjoining land or through an increase in density within the existing site.
- 5.73 Such expansion does not always result in an increase in the population of a site, e.g. where the inhabitants of new pitches are already resident on the site, such as aging children. It may also be possible for sites to expand without having a material impact on any criteria-based policy considerations.
- 5.74 In other cases, the expansion of a site may conflict with a criteria-based policy, e.g. where the increased traffic flows mean an existing access becomes unsafe, or where the provision of new pitches causes harm to environmental interests.
- 5.75 The approach to site expansion should respect a right to household privacy and should not seek to over-concentrate the number of households in any one area. The expansion of sites should also be closely controlled so that it is only permitted where proportionate to meeting local accommodation needs and to ensure that any site, or grouping of sites, does not dominate the nearest settled community.
- 5.76 Each proposal for site expansion should be considered on its individual merits. The criteria-based policy suggested in this Issues Paper could form the basis for considering any proposal to expand an existing or future site.

Options

Options	Commentary
A) Retain Policy GT1 – Michelins Farm	<p>The existing allocated site at Michelins Farm is allocated for 15 pitches and would therefore be able to meet a significant proportion of identified accommodation needs by 2038 if developed.</p> <p>The deliverability of the site may need to be re-assessed to ensure that there is still a realistic prospect of the site being developed for Gypsy and Traveller accommodation within the next five years. As this site has not been the subject of a planning application to date, its availability and suitability for development are uncertain. Inspectors on recent appeal decisions have notably raised concerns over the short-term deliverability of this site and doubts over whether the Policy alone provides the choice or promotion of private traveller site provision envisaged by national policy. If the policy is retained, the Council may need to consider permitting</p>

	pitches on other sites to address existing accommodation needs.
B) Authorise existing unauthorised and/or temporary sites	Some existing unauthorised or temporary sites could be allocated or granted permanent permissions to help meet a proportion of identified accommodation needs by 2038.
C) Allocate sites identified through the Call for Sites	<p>Some potential sites received through the Call for Sites process could be allocated to help meet a proportion of identified accommodation needs by 2038.</p> <p>The suitability of these sites may need to be assessed in line with any criteria-based assessment or policy. A number of these sites may not be considered suitable for allocation as a result of this assessment.</p>
D) Allow for the limited expansion or intensification of existing sites	<p>Some existing sites could be permitted to expand or intensify to help meet a proportion of identified accommodation needs by 2038.</p> <p>The impact of this expansion or intensification may need to be assessed in line with any criteria-based assessment or policy. A number of these sites may not be considered suitable for expansion or intensification as a result of this assessment.</p>
E) Re-open the Call for sites process to identify any additional sites which may be available for Gypsy and Traveller accommodation	<p>The Council could re-open the 'Call for Sites' process for a limited period to identify any additional sites that could be available or suitable for Gypsy and Traveller accommodation.</p> <p>This could help the Council to conclude upon an exhaustive list of potential sites for accommodation but would take additional time and resources to undertake, which might delay the Council's ability to resolve supply issues in the short term.</p>

Question 14

Which option(s), or sites, do you consider to be best for meeting the accommodation needs of Gypsy and Travellers?

Are there any other options that you feel the Council should consider in identifying sites for Gypsy and Traveller accommodation?

6 Site Characteristics and Layout

- 6.1 The Council has commenced work on supporting an Essex Planning Officers' Association (EPOA) project to develop a design guide for Gypsy and Traveller sites across Essex which is expected to progress into 2019. Set out below is a consideration of different principles and requirements that could be included in a policy or design guide.

Site Size

- 6.2 The majority of existing sites in the District are small, consisting of only 1 or 2 pitches occupied by a single household or family. Smaller sites can have advantages in terms of promoting cohesion and integration between the Gypsy and Traveller community and the settled community, as well as being able to meet the familial needs of a household. In some circumstances, smaller sites may also be preferable from a criteria-based perspective, as any impacts caused by the development may be less or easier to mitigate. In rural areas, the PPTS is clear that sites should not be allowed to be so large that they dominate the nearest settled community.
- 6.3 As an alternative, the provision of larger sites allows a greater number of pitches to be accommodated and therefore may be able to address the needs of several households through a single comprehensive allocation.
- 6.4 The maximum appropriate size of a site will be determined by its location and characteristics, and the application of any criteria-based assessment or policy. It is important to ensure that the size of a site is sympathetic to the area in which it is sited. For example, in some cases, the proposed highways access to a site may be suitable for 1 or 2 pitches, but would not be able to safely or conveniently accommodate the traffic movements of several pitches.
- 6.5 It is generally considered best practice to provide for choice in site options to reflect the differing needs of households within the Gypsy and Traveller community.

Question 15

What do you consider to be the appropriate balance between large (>5 pitches) and small (<5 pitches) sites?

Site Design and Layout

- 6.6 Sites should be designed and laid out to ensure a safe and pleasant living environment for all households. Sites should provide visual and acoustic privacy for all households and be aesthetically compatible with the surrounding environment.
- 6.7 The PPTS requires local planning authorities to attach weight to opportunities for promoting healthy lifestyles, including the provision of adequate landscaping and play areas for children.

- 6.8 The size and design of individual pitches should consider the likely requirements of each pitch; this may include a static caravan, a touring caravan and a utility building (or dayroom), together with space for the parking of vehicles. Sites, or their individual pitches, will be expected to set aside areas for external amenity, such as open spaces or play spaces for children. Pitches should be located, designed and orientated so as to ensure privacy for each household.
- 6.9 The number of pitches on a site should be carefully limited to safeguard the safety and well-being of its residents and to ensure aesthetic compatibility of the site with the surrounding environment.
- 6.10 The boundary should provide a clear demarcation of the perimeter of the site. Sites will also be expected to incorporate soft or hard landscaping as appropriate to mitigate the visual impact of the site. When designing sites, the role of soft landscaping in helping to spatially manage the site should also be considered, such as to prevent the unauthorised pitching of additional caravans or to ensure other regulations such as fire safety distances are complied with.
- 6.11 Whilst beyond the remit of planning policy, sites should generally be laid out to ensure that no caravans fall within 6 metres of another caravan occupied separately, in the interests of fire safety. Other structures may be permissible within this separation zone, if they do not impede any means of escape.
- 6.12 Whilst previous national guidance on designing Gypsy and Traveller sites² has now been withdrawn, it identified a preference towards a circular or horseshoe layout of sites, rather than the more traditional linear layout of pitches. In the absence of national guidance, it may no longer be appropriate to be overly prescriptive in terms of site layout, but any policy approach will need to consider whether the layout proposed helps to meet the safety, well-being and amenity needs of the Gypsy and Traveller households residing on the site.
- 6.13 This withdrawn guidance also promoted the inclusion of communal recreation areas on sites, particularly in areas where suitable existing play areas are not accessible within a safe, walking distance. It also suggested that such play areas are in prominent parts of the site where natural supervision was possible.
- 6.14 In order to promote health and well-being, and in acknowledgement that Gypsy and Traveller communities commonly achieve worse health outcomes than the settled community, the Council could consider requiring the provision of specific open space and/or play areas as part of any new sites. This would be particularly important where a site would not have immediate access to an existing area of open space.
- 6.15 It may not always be appropriate for open space or play areas to be provided on site however, such as where no children would be resident on the site, or where the site benefits from a safe walkable access to an existing area of open space or play equipment.

² DCLG (2008). *Designing Gypsy and Traveller Sites: Good Practice Guide*.

Question 16

Do you consider it appropriate for the Council to set design and layout principles for any new Gypsy and Traveller sites?

Are there any additional design and layout principles that should be incorporated?

Vehicle Parking

- 6.16 In designing the layout of a site, attention should be given to ensuring that the site provides an appropriate amount of parking for the personal and commercial vehicles of households who would reside on that land.
- 6.17 Each pitch should set aside an area of land sufficient for the parking of at least one personal vehicle. Any bay should be a minimum of 5.5m x 2.9m in size. Bays should also be sited and oriented to allow for the safe turning of vehicles within the site.
- 6.18 Where commercial vehicles are to be parked on the site, enough space should be set aside within the site to allow for the safe parking of these vehicles. The minimum bay size set aside per commercial van should be 7.5m x 3.5m. These parking bays should be sited and oriented to allow for the safe turning of vehicles within the site. Other than in exceptional circumstances, vehicles parked on the site should not usually exceed 3.5 tonnes.
- 6.19 The level of parking on a site should be limited to be proportionate to the number of households on the site. In no circumstances should parking on the site be itself used for commercial purposes, such as the storage of vehicles.

Question 17

Do you consider it appropriate for the Council to set parking standards for any new Gypsy and Traveller sites?

Are there any additional parking standards that should be incorporated?

Commercial Operations

- 6.20 Policy F of the PPTS requires local planning authorities to consider, where possible, exploring opportunities for traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents. Where this approach is not practical, the PPTS suggests that local planning authorities should consider the scope for identifying separate sites for residential and business purposes near one another.

- 6.21 In some circumstances, it may be appropriate for sites to be designed so as to provide space for the households the site to undertake commercial operations. However, the presence of commercial operations on a site is likely to be considered inappropriate where it would lead to conflict with the criteria within any criteria-based policy or assessment, such as where it would detract from the essential characteristics of the Green Belt, special landscape areas or areas of high biodiversity value, or where it would give rise to amenity or access issues to residents on the site or those in close proximity.

Question 18

Do you consider it appropriate for the Council to permit commercial operations on Gypsy and Traveller sites in certain circumstances?

Are there any additional issues relating to commercial operations that should be considered?

Question 19

Are there any additional site-based requirements that should be considered?

7 Site Delivery and Management

- 7.1 The allocation or granting of permission of sites for Gypsy and Traveller accommodation is only one step in the process of delivering pitches. As with the delivery of houses for the settled community, these sites require a person, household or organisation to be willing to develop them.
- 7.2 Delivering public sites would allow the Council to take a more pro-active approach to meeting the needs of Gypsy and Traveller households. Being the owner of a site(s) would give the Council greater control over the supply of pitches and reduce the risk of failing to meet the identified accommodation needs of the Gypsy and Traveller community. Delivering public sites would have significant resource implications for the Council however, and it may not be financially feasible nor prudent for the Council to acquire the necessary land, deliver pitches or manage them.
- 7.3 In recent decades, national policy has generally placed greater emphasis on delivering privately owned sites and ‘owner-occupied’ sites. All existing, occupied sites within the District are privately owned and managed. Reliance on private sites places a more re-active role upon the Council and requires households or private developers to acquire sites and deliver them for Gypsy and Traveller accommodation.
- 7.4 A further option could be for sites, or parts of sites, to be owned, delivered and managed by registered social landlords and which contribute towards the supply of affordable housing within the District. Similar to private sites, this delivery option will require a registered social landlord to be willing to acquire, deliver and manage a site.
- 7.5 In practice, it may be that a combination of different delivery and management options will need to be pursued to ensure choice and diversity in site supply.

Options

Options	Commentary
A. Sites to be delivered and managed by those Gypsy or Traveller households who would occupy them	Once sites are allocated or permissioned for Gypsy and Traveller accommodation, they could be purchased by members of the Gypsy and Traveller community who would then be able to deliver and manage the site themselves, subject to the conditions on any planning permission and any other relevant restrictions.
B. Sites to be delivered and managed by registered social landlords	Allocated or permissioned sites could provide a contribution towards affordable housing contribution within the District with a registered social landlord responsible for their delivery and management. Pitches could be sold or rented to Gypsy and Traveller households but would have to remain affordable. The registered social landlord would likely be responsible for the day to day management and upkeep of the site.

C. Sites to be delivered and managed by private landlords	Once sites are allocated or permissioned for Gypsy and Traveller accommodation, they could be purchased by a private landlord with members of the Gypsy and Traveller community able to rent individual pitches or groups of pitches. The private landlord would typically be responsible for ensuring the site was fit for occupation and the day to day management and upkeep of the site.
D. Sites to be delivered and managed by the Council ('Public Sites')	<p>The Council could purchase a site allocated or permissioned for Gypsy and Traveller accommodation and subsequently be responsible for its delivery and management. Individual pitches or groups of pitches could be rented to households with the Council acting as the landlord. The Council would then be responsible for ensuring the site was fit for occupation and the day to day management and upkeep of the site.</p> <p>Alternatively, the Council could own the site but appoint a responsible third party to deliver and manage the site on its behalf.</p>

Question 20

Which option(s) do you consider to be best for delivering and managing Gypsy and Traveller sites?

Are there any other options for site delivery and management that you feel the Council should consider?

8 Transit Sites and Temporary Stopping Places

- 8.1 The PPTS requires the Council to consider the travelling needs of the Gypsy and Traveller community, including the temporary or transit accommodation needs of those households who may have a fixed base elsewhere but who are travelling through the District for work or other reasons.
- 8.2 A transit site would provide for the accommodation needs of Gypsies and Travellers on a short-term temporary basis, such as a few days or a few weeks. These sites would not be available for longer term or permanent accommodation as these needs should be met separately through the delivery of permanent sites.
- 8.3 Whilst a transit site would not be available for long term occupation by a single household, the site may still have the characteristics of a permanent site if used contiguously by different households. It is therefore important that any transit sites adhere to the same suitability criteria as any permanent sites.
- 8.4 Temporary stopping places are instead intended for very short-term use, such as a single night or a weekend. A temporary stopping place may not be required to meet the same standards as a permanent or transit site, given they are only intended for very short-term use, however they would still be required to provide a safe and convenient highway access, access to basic utilities and provide an overall safe and suitable living environment.
- 8.5 A lack of available transit pitches is one contributory factor in the prevalence of unauthorised encampments. Where suitable and available transit pitches are available within the same local authority area or neighbouring areas, the Council and its partners possess greater powers to deal with unauthorised encampments.
- 8.6 The Essex-wide Gypsy and Traveller Accommodation Assessment 2018 suggested that whilst unauthorised encampments are not a frequent occurrence in Rochford, further work may be needed to identify whether significant need exists for a transit site both within the District and across Essex as a whole. Given the relative prevalence of unauthorised encampments in some neighbouring local authority areas, it may be the case that the needs for a transit site do not justify the delivery of such a site in Rochford, but should instead be planned for and delivered strategically between local authorities across Essex as a whole.
- 8.7 As a result, the Council is contributing to an Essex Planning Officers' Association (EPOA) project to consider the issue of transit sites across the County and the best options for meeting any short-term travelling needs of the Gypsy and Traveller community on a strategic basis.

Options

Options	Commentary
A. Explore options to deliver a transit site within the District	Delivering a transit site within the District would allow the Council to meet the short-term accommodation needs of any Gypsy or Travellers travelling through the District for work or other reasons. This site would need to meet any

	suitability criteria given it may have the characteristics of permanence even if only occupied on a short term basis by any particular household.
B. Work with other local authorities across Essex to consider how any transit or temporary needs could be met strategically, including in other authority areas	The Council could work together with other local authorities across Essex to consider how best to meet the transit and temporary needs of the Gypsy and Traveller community on a strategic County-wide basis. This may mean locating transit and temporary sites in the areas which are subject to the highest prevalence of unauthorised encampments.

Question 21

Which option(s) do you consider to be best for meeting any transit or temporary needs of Gypsy and Traveller households travelling through the District?

Are there any other options for transit or temporary sites that you feel the Council should consider?

9 Next Steps

- 9.1 We are inviting comments on the *Gypsy and Traveller Issues Paper* and its accompanying *Draft Sustainability Appraisal* from **25 February 2019 until 5pm on 8 April 2019**. Please note, we will not usually be able to accept late comments.
- 9.2 Following the consultation, the Council will consider any representations received and use these to inform its subsequent approach to planning for Gypsy and Traveller accommodation needs. The Council intends to publish a 'Feedback Report' in due course to summarise and provide an initial response to the issues, opportunities and comments raised through this consultation.

Question 22

Are there any other matters relating to meeting the accommodation needs of Gypsies and Traveller that you feel the Council should consider?

Sustainability Appraisal (SA) for the Rochford District Council Gypsy and Traveller Accommodation Issues Paper

Regulation 18 Interim SA Report

Rochford District Council

January 2019

Quality information

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Revision History

Revision	Revision date	Details	Name	Position
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v2	15 January 2019	Draft for approval	Nick Chisholm-Batten	Associate Director
v3	16 January 2019	Draft for client review	Alastair Peattie	Associate Director

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1. Introduction

- 1.1 AECOM has been commissioned to undertake an independent Sustainability Appraisal (SA) in support of Rochford District Council's Gypsy and Traveller Accommodation Issues Paper (GTIP).

SA explained

- 1.2 SA is a mechanism of considering and communicating the impacts of an emerging plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising positive effects. Through this approach, the SA for the GTIP seeks to maximise the plan's contribution to sustainable development.
- 1.3 SA is undertaken to address the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.¹ SA is required for Local Plans under the Planning and Compulsory Purchase Act (2004).²
- 1.4 The National Planning Practice Guidance (NPPG) states that "the role of the Sustainability Appraisal is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives."³
- 1.5 In line with the requirements of the SEA Directive, the two key steps in SA are that:
1. When deciding on 'the scope and level of detail of the information' which must be included in the SA Report there is a consultation with nationally designated authorities concerned with environmental issues; and
 2. A report (the 'SA Report') is published for consultation alongside the Draft Plan that presents an assessment of the Draft Plan (i.e. discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.
- 1.6 This Interim Report is concerned with the reasonable alternatives that have been identified and considered at this Regulation 18 stage in the plan making process. The assessment of these alternatives will help inform Rochford District Council's choice of preferred approach. This stage should also involve considering ways of mitigating any adverse effects, maximising beneficial effects and identifying ways of monitoring likely significant effects.
- 1.7 The NPPG states that, "The development and appraisal of proposals in Local Plan documents should be an iterative process, with the proposals being revised to take account of the appraisal findings. This should inform the selection, refinement and publication of proposals".
- 1.8 It also states more widely that the SA "should identify, describe and evaluate the likely significant effects on environmental, economic and social factors using the evidence base".⁴ Criteria for determining the likely significance of effects on the environment are set out in schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

¹ Directive 2001/42/EC

² Section 19

³ Department for Communities and Local Government (2015) Planning Practice Guidance Strategic environmental assessment and sustainability appraisal Para 001 Reference ID: 11-001-20140306 [online] available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> Accessed Jan 2019

⁴ Department for Communities and Local Government (2015) Planning Practice Guidance Strategic environmental assessment and sustainability appraisal Para 014 Reference ID: 11-001-20140306 [online] available at: http://planningguidance.communities.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-local-plans/#paragraph_013 Accessed Dec 2018

This Interim SA Report

- 1.9 This Interim SA Report is published alongside the GTIP, under Regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012.

Context

- 1.10 Rochford District Council's current local development plan comprises a suite of documents, including a Core Strategy 2011, Development Management Plan 2014, Allocations Plan 2014 and four area action plans. These set the overarching vision and planning policies for the District up to 2025.
- 1.11 Policy H7 of the Core Strategy sets out the Council's overarching policy towards Gypsy and Traveller accommodation. The policy sought to allocate 15 pitches by 2018 and identified a number of considerations for allocating these sites.
- 1.12 In response to Policy H7, and its commitment to allocate sufficient land to meet identified needs, Policy GT1 of the Allocations Plan allocated a 1 hectare plot of land at Michelins Farm for Gypsy and Traveller accommodation. This policy further sets out the specific requirements and expectations for the delivery of the site, including design principles, site layout, decontamination requirements and landscape and boundary treatments.
- 1.13 As of the end of 2018, Michelins Farm is yet to be delivered or be subject to a planning application. Its lack of delivery to date has impinged on the Council's ability to demonstrate a sufficient five-year supply of pitches.
- 1.14 Rochford District Council has commenced work on preparing a new Local Plan and in late 2017/ early 2018 held a Regulation 18 consultation ('the Issues and Options consultation') which set out the broad opportunities and challenges facing the District over the next 20 years, including those related to planning for Gypsy and Traveller accommodation.
- 1.15 The Council's latest Local Development Scheme (LDS) sets the timetable for the preparation of the new Local Plan, including a further Preferred Options consultation in October 2019, followed by the drafting of a submission Local Plan in 2020/2021.
- 1.16 In January 2018, Rochford District Council was a co-signatory (along with Basildon Borough Council, Brentwood Borough Council, Castle Point Borough Council, Southend-on-Sea Borough Council, Thurrock Council and Essex County Council) to a Memorandum of Understanding establishing the Association of South Essex Local Authorities (ASELA), and a commitment to joint planning and place-making across South Essex. The Council has also committed to the preparation of a South Essex Joint Strategic Plan (JSP) in partnership with the other South Essex authorities. The South Essex JSP is likely to consider strategic issues relating to Gypsy and Traveller accommodation across South Essex, and is expected to undergo initial public consultation in 2019.
- 1.17 Due to concerns over the deliverability of Policy GT1, Rochford District Council takes the view that it would be prudent to review its approach to Gypsy and Traveller accommodation in advance of the adoption of either Plan, and to prepare a standalone Gypsy and Traveller Issues Paper (the GTIP) to consider how best to plan for identified Gypsy and Traveller needs in detail. Depending on the outcomes of consultation on the Regulation 18 GTIP and accompanying Interim SA Report, and the progress of other development plan documents, the Council will use the Issues Paper to inform its emerging Local Plan, and may decide to prepare a standalone Gypsy and Traveller Development Plan Document.

The Gypsy and Traveller Accommodation Issues Paper

- 1.18 The GTIP addresses a number of District-wide challenges in planning for Gypsy and Traveller accommodation within the District and at a wider cross-boundary strategic scale. It poses 22 key questions for discussion, organised under nine sections. This includes options for policies which may be needed in the Local Plan to deliver sustainable growth to meet the identified needs.

What is the scope of the SA?

- 1.19 The aim here is to introduce the reader to the scope of the SA, i.e. the objectives that should be a focus of (and provide a methodological framework for) the SA. Further information on the scope of the SA – i.e. a more detailed review of the issues and objectives as highlighted through a review of the context and baseline – is presented in the Rochford District Council Local Plan SA Scoping Report (2017).
- 1.20 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. A Scoping Report was sent to the statutory consultees for comment and published on the Council’s website in 2017.⁵ The responses received have been taken into account and amendments made to the baseline information and SA Objectives where necessary.

SA Objectives

- 1.21 **Table 1.1** presents the SA 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.
- 1.22 Taken together, the SA topics and objectives presented in **Table 1.1** provide a methodological ‘framework’ for the appraisal.

Table 1.1: SA framework, as broadly agreed through scoping consultation in 2017

SA Objectives	Decision-aiding questions
Biodiversity	
Protect and enhance biodiversity within and surrounding the District.	Will the option/proposal help to:
Relevant SEA Topics: Biodiversity, flora & fauna	<ul style="list-style-type: none"> 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?
Relevant NPPF Paragraphs: 109 & 117	
Climate Change	
Promote climate change mitigation in Rochford District.	Will the option/proposal help to:
Relevant SEA Topics: Climatic factors	<ul style="list-style-type: none"> 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?
Relevant NPPF Paragraphs: 93-108	

⁵ AECOM (2017) Sustainability Appraisal (SA) for the Rochford District Local Plan SA Scoping Report [online] available at: <https://www.rochford.gov.uk/sites/default/files/RochfordFinalSAScopingReport.pdf> [accessed 14/01/18]

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 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

Will the option/proposal help to:

- Meet the identified objectively assessed housing needs for the

groups in the community.	District?
Relevant SEA Topics: Population and human health	<ul style="list-style-type: none"> • 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 facilities?
Relevant NPPF Paragraphs: 47-78	<ul style="list-style-type: none"> • 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.	Will the option/proposal help to:
Relevant SEA Topics: Population and human health	<ul style="list-style-type: none"> • 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?
Relevant NPPF Paragraphs: 47-78	<ul style="list-style-type: none"> • Enhance the identity of a community or settlement?

Health and Wellbeing

Improve the health and wellbeing of the Rochford District's residents.	Will the option/proposal help to:
Relevant SEA Topics: Population and human health	<ul style="list-style-type: none"> • 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?
Relevant NPPF Paragraphs: 69-78	<ul style="list-style-type: none"> • 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.	Will the option/proposal help to:
Relevant SEA Topics: Population, human health and material assets	<ul style="list-style-type: none"> • 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?
Relevant NPPF Paragraphs: 29-41	

Economy

Support a strong, diverse and resilient economy that provides opportunities for all.	Will the option/proposal help to:
Relevant SEA Topics: Population and human health	<ul style="list-style-type: none"> • 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? • Facilitate working from home, remote working and home-based businesses? • Support the growth of London Southend Airport? • Enhance educational opportunities?
Relevant NPPF Paragraphs: 18-22, 42 & 43	

2. What has plan-making/ SA involved up to this point?

Issues and Options

- 2.1 As identified within the introductory section, Rochford District Council has commenced work on preparing a new Local Plan. To date this has included Regulation 18 consultation on the Issues and Options Document, which set out the broad opportunities and challenges facing the District over the next 20 years. The document included consideration of the opportunities and challenges in planning for Gypsy and Traveller accommodation.
- 2.2 Work on the SA for the Local Plan commenced in late 2016/ early 2017. The SA Scoping Report⁶ was consulted on and finalised in March 2017, and this was shortly followed by an Interim SA Report⁷ in October 2017. The Interim SA Report considered the Issues and Options Document, and accompanied the document in Regulation 18 consultation.
- 2.3 Alongside the Local Plan, Rochford District Council is also committed to the preparation of a South Essex Joint Strategic Plan (JSP) in partnership with the other South Essex authorities. The South Essex JSP is also likely to consider strategic issues relating to Gypsy and Traveller accommodation across South Essex, and is expected to undergo initial public consultation in 2019.
- 2.4 As previously identified, due to concerns over the deliverability of Policy GT1 within the 2014 Allocations Plan, Rochford District Council is seeking to review its approach to Gypsy and Traveller accommodation in advance of the adoption of either Plan.
- 2.5 The GTIP and this accompanying Interim SA Report have been prepared to consider how best to plan for identified Gypsy and Traveller needs. These reports will also undergo consultation to obtain the views of stakeholders. The consultation will inform the Council's approach in regards to this planning matter, and influence decisions in respect of planning for Gypsy and Traveller accommodation either directly through one or both of the plans outlined above, or through a separate Development Plan Document.

⁶ AECOM (2017) Sustainability Appraisal (SA) for the Rochford District Local Plan – SA Scoping Report [online] available at: <https://www.rochford.gov.uk/sites/default/files/RochfordFinalSAScopingReport.pdf> [accessed 16/01/19]

⁷ AECOM (2017) Sustainability Appraisal (SA) of the Rochford Local Plan – Interim SA Report [online] available at: <https://www.rochford.gov.uk/sites/default/files/DraftSARReport.pdf> [accessed 16/01/19]

3. What are the SA findings at this current stage?

- 3.1 The aim of this chapter is to present an appraisal of the options presented within the Gypsy and Traveller Accommodation Issues Paper against the SA topics.

Methodology

- 3.2 The Issues Paper sets out the possible approaches to meeting the existing and future needs of Gypsy and Traveller communities within the District. 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.
- 3.3 The approach and method for the SA at this stage reflects the early stage of plan-making and high level nature of the Issues Paper. 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 1 – What is the scope of the SA?) 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; and
 - Economy.
- 3.4 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 issues presented within the Issues Paper, focussing only on those issues where alternative options are identified. These issues are as follows:
- Policy options;
 - Identifying potential sites;
 - Site delivery and management; and
 - Transit sites and temporary stopping places.
- 3.5 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 policy implementation 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.

Appraisal of the options

Policy options

3.6 The policy options are identified in **Table 3.1** below.

Table 3.1: Policy options

Options	Commentary
A) Retain the Core Strategy Policy H7 – Gypsy and Traveller Accommodation without amendment	<p>This policy was based on advice contained within the now-withdrawn Circular 1/2006 – Planning for Gypsy and Traveller Caravan Sites and pre-dates the NPPF (2012 and 2018) and PPTS⁸ (2015). Whilst the criteria within Policy H7 are considered to still broadly align with national policy, the existing policy does not include reference to all the criteria now included in the NPPF and PPTS.</p> <p>As a result, the Council may not be able to fully assess the suitability of sites in accordance with national policy.</p>
B) Expand or amend Policy H7 to take into account additional suitability criteria	<p>By expanding and amending the policy the Council could ensure that its criteria-based policy more closely aligns with the NPPF and PPTS. These criteria could include reference to;</p> <ul style="list-style-type: none"> Proximity to Basic Services Green Belt Flood Risk Landscape and Visual Impact Biodiversity and Wildlife Heritage Assets Access and Infrastructure Amenity and Site Conditions
C) Do not have a separate criteria-based policy and rely on the NPPF and PPTS	<p>The Council could choose not to have a specific criteria-based policy on Gypsy and Traveller accommodation, and instead rely on the broad policies within the NPPF and PPTS.</p> <p>This approach would give the Council less control over the type of development that went ahead however and could be considered contrary to national policy. If the approach was found to be contrary to national policy, it could result in the Council's development plan being found unsound at the examination stage.</p>

3.7 Similar options were assessed in the Interim SA of the Rochford Local Plan in 2017, however since this time the baseline data has been supplemented by the 2018 South Essex Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (SEGTA) which has taken account of changes in demand and supply and provided an assessment of need over an extended period, up to 2038. The SEGTA has identified an existing total of 24 pitches across 14 sites within Rochford District (none of which are travelling showpeople plots or yards) and a need to deliver an additional 21 pitches in the period up to 2038 to meet the forecasted needs. The 21 pitches include 18 pitches for those travellers considered to meet the planning definition⁹ and 3 pitches for unknown households¹⁰. There were no identified requirements for new plots for travelling showpeople. A further need for an additional 11 pitches for households who do not meet the planning definition is also considered in the assessment; however, the Council are not required to plan for pitches for those householders that do not meet the planning definition of a traveller.

⁸ Planning Policy for Traveller Sites

⁹ A Gypsy or Traveller is defined under the national Planning Policy for Traveller Sites (2015) 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 dependents' 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.”

¹⁰ Where it is unknown whether householders meet the new planning definition or not.

- 3.8 The baseline data reflects more up-to-date evidence than that which underpins Core Strategy Policy H7, and retaining the policy under Option A has the potential to affect population and communities and health and wellbeing. First and foremost Policy H7, as currently adopted, seeks to allocate a total of 15 pitches, which is not of a sufficient scale to meet the identified needs. The shortfall in provision under Option A is likely to affect the Gypsy and Traveller population in the long term and may lead to social exclusion and increased deprivation, with the potential for significant long term negative effects. The shortfall in provision under Option A may also lead to an increase in unauthorised encampments, where there is considered to be a greater potential for negative effects; for example in terms of accessibility, landscape values, designated biodiversity areas, and flood risk.
- 3.9 The adopted Policy H7 also fails to capture the wider range of potential issues arising when considering Gypsy and Traveller accommodation, more recently highlighted through the 2015 Planning Policy for Traveller Sites (PPTS), such as landscape and visual impact, impacts on the performance and function of the green belt, and impacts on the historic environment and biodiversity assets.
- 3.10 The risks of negative effects arising are therefore considered to be substantially greater under Option A than under Option B (which will update the Policy in line with new evidence and the current policy context). An updated policy under Option B will identify the increased need for pitches, and expand on the criterion that underpins decision making in line with the updated NPPF and PPTS. As identified under the option, this will include criterion designed to capture and consider those potential wider effects such as landscape and visual impact, and impacts on heritage and biodiversity assets. Option B therefore reduces the potential for negative effects arising (such as an increase unauthorised encampments) and maximises the potential for positive effects (such as meeting population and community needs and reducing deprivation).
- 3.11 Option C is essentially a 'do nothing' scenario where locally specific information, such as local needs and local constraints to delivery, will not be identified or planned for within the Local Development Framework. Option C is therefore considered to perform less positively against population and communities by not identifying and providing for a long term supply of specialist accommodation alongside traditional market and affordable homes, and potentially by not meeting the full requirements of national policy.
- 3.12 Overall, by updating Gypsy and Traveller accommodation policy guidance to reflect updated evidence (especially in terms of identified needs) and policy context, Option B is considered to be the preferred option.

Identifying potential sites

- 3.13 The options for identifying potential sites are presented in **Table 3.2** below.

Table 3.2: Options for identifying potential sites

Options	Commentary
A) Retain Policy GT1 – Michelins Farm	<p>The existing allocated site at Michelins Farm is allocated for 15 pitches and would therefore be able to meet a significant proportion of identified accommodation needs by 2038 if developed.</p> <p>The deliverability of the site may need to be re-assessed to ensure that there is still a realistic prospect of the site being developed for Gypsy and Traveller accommodation within the next five years. As this site has not been the subject of a planning application to date, its availability and suitability for development are uncertain. Inspectors on recent appeal decisions have notably raised concerns over the short-term deliverability of this site and doubts over whether the Policy alone provides the choice or promotion of private traveller site provision envisaged by national policy. If the policy is retained, the Council may need to consider permitting pitches on other sites to address existing accommodation needs.</p>
B) Authorise existing unauthorised and/or temporary sites	<p>Some existing unauthorised or temporary sites could be allocated or granted permanent permissions to help meet a proportion of identified accommodation needs by 2038.</p>
C) Allocate sites identified through the	<p>Some potential sites received through the Call for Sites process could be allocated to help meet a proportion of identified accommodation needs by 2038.</p>

Call for Sites	The suitability of these sites may need to be assessed in line with any criteria-based assessment or policy. A number of these sites may not be considered suitable for allocation as a result of this assessment.
D) Allow for the limited expansion or intensification of existing sites	<p>Some existing sites could be permitted to expand or intensify to help meet a proportion of identified accommodation needs by 2038.</p> <p>The impact of this expansion or intensification may need to be assessed in line with any criteria-based assessment or policy. A number of these sites may not be considered suitable for expansion or intensification as a result of this assessment.</p>
E) Re-open the Call for sites process to identify any additional sites which may be available for Gypsy and Traveller accommodation	<p>The Council could re-open the 'Call for Sites' process for a limited period to identify any additional sites that could be available or suitable for Gypsy and Traveller accommodation.</p> <p>This could help the Council to conclude upon an exhaustive list of potential sites for accommodation but would take additional time and resources to undertake, which might delay the Council's ability to resolve supply issues in the short term.</p>

- 3.14 The allocation of sites to meet the identified needs has the potential to affect a number of the SA topics. No specific sites with set boundaries have been assessed within this appraisal, and as such there remains an element of uncertainty, and a generalised approach making certain assumptions (as identified within the narrative) is taken.
- 3.15 The allocation of Michelins Farm under Option A, and potential expansion of existing sites under Option D are considered less likely to lead to significant negative effects in relation to the SA topics, as it is assumed that they have already been largely assessed as acceptable in development terms; with Michelins Farm being an existing allocation carried forward from the Core Strategy and the existing sites obviously having already been built out / deemed a generally acceptable location on the whole (though it is recognised here that there is still the potential for effects to arise as a result of expansion into new areas of land). However, the Michelins Farm site under Option A, despite being allocated within the adopted Allocations Plan for over 4 years now, has not been built out or delivered and as such, may not be suitable or realistic as an isolated option to meet the identified needs and support the SA topics of population and communities and health and wellbeing. In this respect Option D is considered more likely to result in positive effects (in relation to the delivery of housing to meet local needs) for population and communities and health and wellbeing, when compared to Option A.
- 3.16 Whilst Option C may deliver some additional space to help meet needs; all of the sites emerging from the call for sites (with the exception of the Michelins Farm site) were found undeliverable within the 2017 SHELAA¹¹ - largely due to their presence within the Green Belt, which creates uncertainty in the ability of this option to positively contribute to meeting the identified needs. The option identifies that further assessment in relation to the impact of development at these sites would be required, and until this assessment is complete Option C is considered to perform less positively than Options A and D, when considered as a stand-alone option to meet the identified needs.
- 3.17 Similarly Option E has the potential to capture a wider range of site options to meet needs, but it is not known at this stage whether this will realise new sites of a sufficient scale or quantity to deliver needs within accessible and acceptable locations.
- 3.18 It is further assumed that the existing unauthorised sites are less likely to be in locations that have been assessed in terms of their impact, and as such Option B is considered to have greater potential for negative effects arising (potentially of significance at this stage) than the other options which have been subject to an assessment of suitability. These potential negative effects are likely to relate to the SA topics of biodiversity, landscape and historic environment, environmental quality, and land, soil and water resources which are generally affected by the location and scale of development. However, this may not be the case for the existing temporary sites which are considered alongside unauthorised sites under Option B. The temporary sites are more likely to have been assessed as suitable locations for temporary accommodation and considered for its natural characteristics of permanence to some degree when temporary sites are continuously used by different households. These sites are

¹¹ Strategic Housing and Employment Land Availability Assessment

considered more likely to be able to positively contribute to meeting needs, and potentially within locations which have been deemed generally acceptable in terms of their impact, which have a precedent of this specialist housing type. The potential for these positive effects however are dependent upon the identification of suitable alternative temporary sites which will accommodate for the identified need for temporary pitches.

- 3.19 Overall, if the issues identified above under the options are addressed, it is considered that a combination of the options will have greater potential for positive effects. The required further assessment will also identify those locations that are preferable in terms of minimising the impact of development on social, economic and environmental factors. It is recommended that any new sites and unauthorised encampment sites are assessed to the same level as other sites coming forward through the SHELAA and previous call for sites, and further SA work assesses refined site options with identified boundaries.

Site delivery and management

- 3.20 The options for site delivery and management are presented in **Table 3.3** below.

Table 3.3: Options for site delivery and management

Options	Commentary
A. Sites to be delivered and managed by those Gypsy or Traveller households who would occupy them	Once sites are allocated or permissioned for Gypsy and Traveller accommodation, they could be purchased by members of the Gypsy and Traveller community who would then be able to deliver and manage the site themselves, subject to the conditions on any planning permission and any other relevant restrictions.
B. Sites to be delivered and managed by registered social landlords	Allocated or permissioned sites could provide a contribution towards affordable housing contribution within the District with a registered social landlord responsible for their delivery and management. Pitches could be sold or rented to Gypsy and Traveller households but would have to remain affordable. The registered social landlord would likely be responsible for the day to day management and upkeep of the site.
C. Sites to be delivered and managed by private landlords	Once sites are allocated or permissioned for Gypsy and Traveller accommodation, they could be purchased by a private landlord with members of the Gypsy and Traveller community able to rent individual pitches or groups of pitches. The private landlord would typically be responsible for ensuring the site was fit for occupation and the day to day management and upkeep of the site.
D. Sites to be delivered and managed by the Council ('Public Sites')	The Council could purchase a site allocated or permissioned for Gypsy and Traveller accommodation and subsequently be responsible for its delivery and management. Individual pitches or groups of pitches could be rented to households with the Council acting as the landlord. The Council would then be responsible for ensuring the site was fit for occupation and the day to day management and upkeep of the site. Alternatively, the Council could own the site but appoint a responsible third party to deliver and manage the site on its behalf.

- 3.21 The party responsible for the ongoing management of any new or extended allocations for Gypsy and Traveller accommodation is unlikely to lead to significant effects in relation to the SA Objectives, which are predominantly affected by the scale and location of the associated development. As such, none of the options for site delivery and management are considered likely to lead to any significant effects.
- 3.22 There is however the potential for minor effects in relation to the delivery of affordable housing under Option B. Whilst no specific affordable housing needs are identified through the SEGTA, the contributions could support the Gypsy and Traveller community by increasing access to specialist housing (and thus supporting a reduction in the factors contributing to deprivation) with the potential for minor long term positive effects for the SA topics of population and communities, and health and wellbeing. However, it is not clear whether the affordable housing contributions are apportioned accordingly to meet the identified needs of the whole of the District; meaning that it is not clear whether Option B would lead to Gypsy and Traveller

pitches being identified as contributing to meeting the affordable housing needs of those residents who do not require this type of housing/ have different housing type needs – which could lead to minor long term negative effects in relation to the SA topics of population and communities and health and wellbeing.

Transit sites and temporary stopping places

3.23 The options in relation to transit sites and temporary stopping places are presented in **Table 3.4** below.

Table 3.4: Options for transit sites and temporary stopping places

Options	Commentary
A. Explore options to deliver a transit site within the District	Delivering a transit site within the District would allow the Council to meet the short-term accommodation needs of any Gypsy or Travellers travelling through the District for work or other reasons. This site would need to meet any suitability criteria given it may have the characteristics of permanence even if only occupied on a short term basis by any particular household.
B. Work with other local authorities across Essex to consider how any transit or temporary needs could be met strategically, including in other authority areas	The Council could work together with other local authorities across Essex to consider how best to meet the transit and temporary needs of the Gypsy and Traveller community on a strategic County-wide basis. This may mean locating transit and temporary sites in the areas which are subject to the highest prevalence of unauthorised encampments.

3.24 The delivery of a transit site(s) under both options has the potential to positively affect the SA topics of population and communities, and health and wellbeing, by contributing to meeting the needs of Gypsy and Traveller communities in transit which may otherwise be excluded.

3.25 Without a strategic transit site, it is likely that needs will continue to be met through unauthorised encampments. Unauthorised encampments have a greater potential for minor to significant negative effects in relation to SA topics such as biodiversity, landscape and the historic environment, environmental quality and land, soil and water resources. This is largely due to the lack of planning and mitigation in relation to site location, scale, layout and design.

3.26 As such, both options are considered to have merits, and both options are likely to contribute to reducing unauthorised encampment and the potential negative effects associated with this. Overall, it is likely that a combination of the options will have a greater potential to support positive effects; through the exploration of locations that could meet needs whilst minimising impact. Given the nature of transit site(s) (in supporting those members of the community whose needs extend administrative boundaries) a strategic approach to the delivery of these site(s) would obviously be beneficial and can avoid oversupply across the wider area. It is also considered prudent to examine all the possible options for meeting these needs (thus exploring any potential options within the District under Option A as well as outside the District under Option B) to identify the best potential location. A strategic approach (under Option B) will seek to meet needs across a wider area; this could result in development of a transit site outside of the District, but could also result in a larger development site within Rochford if a suitable location is identified.

4. Next steps

4.1 The aim of this chapter is to explain the next steps in the plan-making/ SA process.

Next steps

- 4.2 This Interim SA Report will accompany the GTIP for public consultation in early 2019. Any comments received will be reviewed and then taken into account as part of the iterative plan-making and SA process.
- 4.3 Depending on the outcomes of consultation on the GTIP and accompanying Interim SA Report, and the progress of other development plan documents, the Council plans to use the Issues Paper to inform its emerging Local Plan, and may decide to prepare a standalone Gypsy and Traveller Development Plan Document.

1 Introduction

- In October 2018, the Council decided to prioritise the preparation of a Gypsy and Traveller Issues Paper to consider the key challenges and opportunities relating to meeting Gypsy and Traveller needs in the District. This Issues Paper identifies possible approaches to meeting the existing and future needs of Gypsy and Traveller communities within the District.
- 1.1 The purpose of this note is to summarise the programme of consultation and public engagement for this Issues Paper.
- 1.2 The Council's adopted Statement of Community Involvement (SCI) 2016¹ sets out the overriding principles for how the Council will engage and consult with the local community – including residents, organisations and businesses – and any other interest parties on planning matters. This note expands upon and applies the Council's adopted SCI.

2 Summary of Communication and Engagement Strategy

- 2.1 In accordance with the Council's adopted SCI, a range of notification and engagement methods will be employed to raise awareness and encourage public participation in the consultation.
- 2.2 The Council's preference is for representations to be made through its online portal, but for those residents who prefer paper submissions, that option is available.
- 2.3 The Council will ensure that its engagement methods reach a broad base of residents, organisations and businesses to ensure that the overall response is representative of the population and that all potential interested parties are provided with an opportunity to engage in the consultation.
- 2.4 Given the scope of the consultation, the Council will employ engagement methods designed to reach identified 'hard to reach' groups including the local Gypsy and Traveller population.
 - To promote the consultation, the Council will employ the methods listed in its SCI, including: Sending e-mails, or e-bulletins, to individuals and organisations subscribed to its Planning Policy mailing list;
 - Sending letters to those individuals and organisations subscribed to its Planning Policy database (and have notified the Council of their preference to be contacted by post);
 - Displaying the consultation details prominently on its website, including through use of banners and headers;
 - Advertising the consultation through its official social media accounts;

¹ https://www.rochford.gov.uk/sites/default/files/planning_sci_2016_0.pdf

- Producing posters, leaflets and media briefings to be displayed in local publications and in prominent locations across the District;
 - Engaging with and providing information to MPs, Parish and Town Councils; and
 - Directly contacting known Gypsy and Traveller households within the District, including by arranging direct meetings.
- 2.5 In accordance with its SCI, the Council will consider employing additional or alternative methods of promotion where it is identified that the existing methods have been ineffective.
- 2.6 In the interests of the environment, the Council will actively encourage respondents to provide consultation responses via its online portal. However, it is acknowledged that this is not an accessible means of engagement for some groups, therefore paper reference copies of consultation material will also be available in Council offices and local libraries, and can be provided to Parish or Town Councils upon request.
- 2.7 The Council will also collect information allowing it to monitor the success of the consultation. Such information will include:
- the number of respondents and demographic information relating to these respondents;
 - how these respondents became aware of the consultation opportunity;
 - the number of visitors, or 'hits', to the relevant section of the Council's website;
 - extent of local media coverage; and
 - analytical information from the Council's social media profiles

3 Submitting Comments

- 3.1 The Council will invite comments on the consultation in the following ways:
- **Online:** Through the Council's online consultation portal, available at: www.rochford.gov.uk/gtip
 - **Email:** To planning.policy@rochford.gov.uk
 - **Post:** Addressed to Strategic Planning, Rochford District Council, Council Offices, South Street, Rochford, Essex, SS4 1BW
- 3.2 To help ensure that responses are both clearly structured and contain all the information necessary to be considered duly made, the Council will produce a standard response pro-forma for those submitting comments via post. These pro-formas will be available online and alongside reference material in Council offices and local libraries.

- 3.3 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.
- 3.4 Responses that are of an abusive, defamatory or discriminatory nature will not be accepted.
- 3.5 All responses accepted as duly-made will be logged on the Council's online portal and will be available to view online as soon as practical. The Council will also produce a 'feedback report' once the consultation has closed to summarise the responses received and provide an initial Officer response to the key issues raised.