

Sustainability Appraisal (SA) of the Rochford Local Plan

Interim SA Report

Rochford District Council

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Quality information

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1. Introduction

1.1 Background

AECOM is commissioned to lead on Sustainability Appraisal (SA) in support of Rochford District Council's emerging new Local Plan (hereafter referred to as the 'Local Plan'). SA is a mechanism for considering and communicating the likely effects of a Draft Plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising the positives. SA of Local Plans is a legal requirement.¹

1.2 SA Explained

It is a requirement that SA is undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which transposed into national law EU Directive 2001/42/EC on Strategic Environmental Assessment (SEA).²

In accordance with the Regulations, a report (known as the SA Report) must be published for consultation alongside the Draft Plan that essentially 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'.³ The report must then be taken into account, alongside consultation responses, when finalising the plan.

More specifically, the SA Report must answer the following three questions:

1. What has Plan-making / SA involved up to this point?
 - Including in relation to 'reasonable alternatives'.
2. What are the SA findings at this stage?
 - i.e. in relation to the Draft Plan.
3. What happens next?
 - What steps will be taken to finalise (and monitor) the plan?

1.3 This Interim SA Report

This Interim SA Report is published alongside the Issues and Options Document, under Regulation 18 of the Local Planning Regulations. The legally required SA Report will be published subsequently, alongside the final draft ('Pre-Submission') version of the Local Plan, under Regulation 19 of the Local Planning Regulations.

Despite being an interim report, it is nonetheless helpful for this report to provide the information required of the SA Report. As such, questions 1 – 3 above are answered in turn.

Before answering Question 1, two initial questions are answered in order to further 'set the scene': i) What is the plan trying to achieve?; and ii) What is the scope of the SA?

1.4 Rochford District's new Local Plan

Rochford District Council ('the Council') is in the process of undertaking an early review of its current Local Development Plan (LDP) in response to policy and guidance changes at the national and local level, which include the publication of the National Planning Policy Framework (NPPF), National Planning Practice Guidance (NPPG) and updated evidence (e.g. the South Essex Strategic Housing Market Assessment). It will include strategic and detailed planning and development management

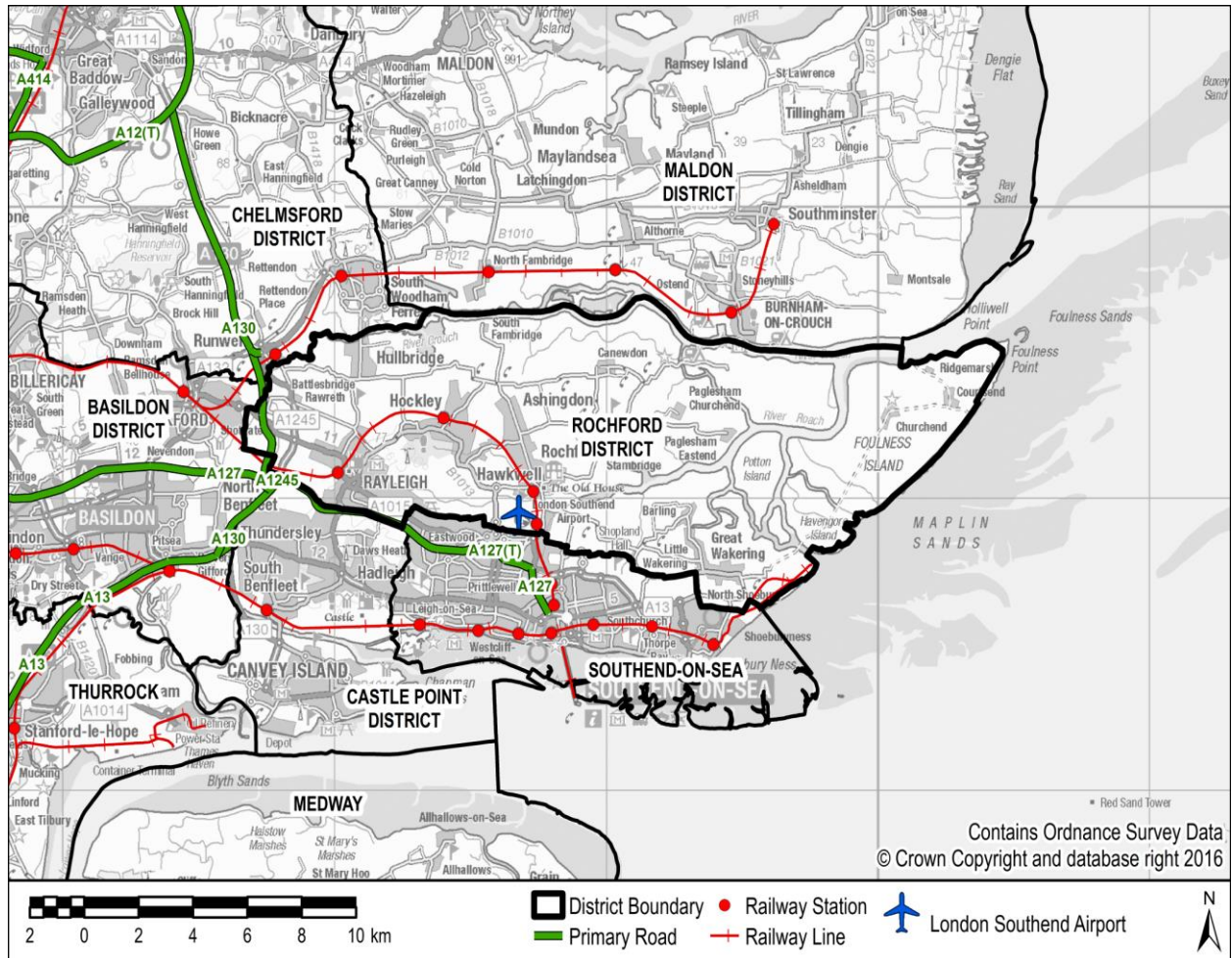
¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (2012). The Town and Country Planning (Local Planning) (England) Regulations 2012 require that an SA Report is published for consultation alongside the 'Proposed Submission' plan document.

² The SA process incorporates the SEA process. Indeed, SA and SEA are one and the same process, differing only in terms of substantive focus. SA has an equal focus on all three 'pillars' of sustainable development (environment, social and economic).

³ Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004

policies, land allocations for housing, employment and mixed use and identify areas in the District for protection.

Figure 1: Rochford District



1.4.1 Issues and Options Document

The Issues and Options Document represents the Council’s first public stage of plan preparation in accordance with the Town and Country Planning Regulations (2012). In line with Regulation 18 the Council are undertaking this consultation to inform future stages in the preparation of the Local Plan.

The Issues and Options document sets out a number of key District-wide challenges in preparing the new Local Plan and planning positively for growth in homes, jobs and associated infrastructure. It proposes a number of key issues for discussion. These include options for policies which may be needed in the Local Plan to deliver good growth, high quality design, jobs and economic activity and protection of the natural and built environment. What is the scope of the SA?

1.4.2 Scoping

The aim here is to introduce the reader to the scope of the SA, i.e. the sustainability objectives that should be a focus of (and provide a broad methodological framework for) SA. Further information on the scope of the SA - i.e. a more detailed review of sustainability issues/objectives as highlighted through a review of the sustainability ‘context’ and ‘baseline’ - is presented in the Scoping Report.

The Regulations require that “When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA scope], the responsible authority shall consult the consultation bodies”. In England, the consultation bodies are the Environment Agency,

Historic England and Natural England.⁴ A Scoping Report was sent to the statutory consultees for comment in December 2016. The responses received were taken into account and amendments made to the baseline information and draft SA Objectives where necessary. A Final Scoping Report was produced in March 2017 and is available on the Council's website.

1.4.3 SA Objectives

Table 1 presents the draft sustainability objectives - grouped under nine topic headings - established through SA scoping, i.e. in light of context/baseline review, identified key issues and responses from statutory consultees.

Taken together, the sustainability topics and draft objectives presented in Table 1 provide a methodological 'framework' for appraisal.

Table 1: SA Objectives

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

⁴ In accordance with Article 6(3) of the SEA Directive, these consultation bodies were selected because 'by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.'

SA Objectives

Decision-aiding questions

South Suffolk Shoreline Management Plan?

Landscape and Historic Environment

Protect and enhance the significance of the District's historic environment, heritage assets and their settings.

Relevant SEA Topics:

Cultural heritage including architectural and archaeological heritage

Relevant NPPF Paragraphs:
6-10 & 126-141

Will the option/proposal help to:

- Protect, and where possible, enhance heritage assets and their settings?
- Protect, and where possible, enhance conservation areas?
- Protect, and where possible, enhance the wider historic environment?
- Support access to, interpretation and understanding of the historic environment?

Protect and enhance the character and quality of the District's landscapes and townscapes.

Relevant SEA Topics:

Landscape

Relevant NPPF Paragraphs:
109-125

Will the option/proposal help to:

- Protect and enhance landscape and townscape character?
- Support the integrity of the District's conservation areas?
- Protect the tranquil areas in the east of the District that remain relatively undisturbed by noise and are important for their recreational and amenity value?

Environmental Quality

Improve air, soil and water quality.

Relevant SEA Topics:

Soil, water and air

Relevant NPPF Paragraphs:
109-125

Will the option/proposal help to:

- Maintain or improve local air quality?
- Promote the remediation of contaminated land?
- Protect and improve the area's chemical & biological water quality?
- Protect groundwater resources?

Land, Soil and Water Resources

Promote the efficient and sustainable use of natural resources.

Relevant SEA Topics:

Water and soil

Relevant NPPF Paragraphs:
47-78

Will the option/proposal:

- Promote the use of previously developed land?
- Avoid the use of land classified as best and most versatile agricultural land?
- Minimise water consumption?
- Reduce the amount of waste produced and move it up the waste hierarchy?
- Encourage recycling of materials and minimise consumption of resources during construction?

Population and Communities

Cater for existing and future residents' needs as well as the needs of different groups in the community.

Relevant SEA Topics:

Population and human health

Relevant NPPF Paragraphs:

Will the option/proposal help to:

- Meet the identified objectively assessed housing needs for the District?
- Ensure an appropriate mix of dwelling sizes, types and tenures to meet the needs of all sectors of the community?
- Provide housing in sustainable locations that allow easy access to a range of local services and

SA Objectives

Decision-aiding questions

47-78

facilities?

- Promote the development of a range of high quality, accessible community facilities, including specialist services for disabled and older people?

To maintain and enhance community and settlement identity.

Will the option/proposal help to:

- Avoid the coalescence of settlements and loss of Green Belt land, where possible?
- Provide development in the most deprived areas and stimulate regeneration?
- Can development effectively integrate within the existing settlement pattern?
- Enhance the identity of a community or settlement?

Relevant SEA Topics:

Population and human health

Relevant NPPF Paragraphs:

47-78

Health and Wellbeing

Improve the health and wellbeing of the Rochford District's residents.

Will the option/proposal help to:

- Promote accessibility to a range of leisure, health and community facilities for all age groups?
- Encourage healthy lifestyles and reduce health inequalities?
- Enhance multifunctional green infrastructure networks in the District and neighbouring authority areas?
- Provide and enhance the provision of community access to green infrastructure?
- Improve access to the countryside for recreation?
- Promote the use of sustainable transport modes such as walking and cycling?

Relevant SEA Topics:

Population and human health

Relevant NPPF Paragraphs:

69-78

Transport and Movement

Promote sustainable transport use and reduce the need to travel.

Will the option/proposal help to:

- Reduce the need to travel through sustainable patterns of land use and development?
- Encourage modal shift to more sustainable forms of travel?
- Enable transport infrastructure improvements?
- Facilitate working from home and remote working?
- Provide improvements to and/ or reduce congestion on the existing highway network?

Relevant SEA Topics:

Population, human health and material assets

Relevant NPPF Paragraphs:

29-41

Economy

Support a strong, diverse and resilient economy that provides opportunities for all.

Will the option/proposal help to:

- Facilitate the provision of the right type of employment land in the right place?
- Provide employment in the most deprived areas and stimulate regeneration?
- Support the economic vitality and viability of the District's town centres?
- Create opportunities for a variety of businesses and people to flourish in the District?
- Support the rural economy?
- Support the visitor economy?

Relevant SEA Topics:

Population and human health

Relevant NPPF Paragraphs:

18-22, 42 & 43

SA Objectives

Decision-aiding questions

- Facilitate working from home, remote working and home-based businesses?
 - Support the growth of London Southend Airport?
 - Enhance educational opportunities?
-

The background is a solid black field. Three thin, white lines intersect to form a large, irregular white shape. One line runs from the top-left towards the bottom-right. Another line runs from the top-right towards the bottom-left. A third line runs from the left edge towards the right edge, slightly angled upwards. These lines intersect to create a central white area that resembles a stylized letter 'A' or a similar geometric form.

**Part 1: What has plan-making/
SA involved up to this point?**

2. Introduction (to Part 1)

The chapter sets out the work undertaken by the Council to date in the preparation of the Local Plan and the Issues and Options document.

2.1 Background

The Council began preparation of the new Local Plan in 2016 which will set the strategy for the future development of the District beyond 2025 - the period covered by the current local development plan. The new Local Plan will replace a number of the adopted policy documents which form the local development plan for the District.

The Council has been developing and preparing the evidence base to inform plan-making. A wide range of studies have been, and will be, undertaken. These include studies on the need for new homes, infrastructure, open spaces, and the character of the District's built-up areas and landscapes.

2.2 Developing alternatives

A revision to the South Essex Housing Market Assessment (SHMA) was published in May 2016, and updated in June 2017 to reflect more up-to-date national household projections, as required by the Planning Practice Guidance (PPG). Its purpose is to assess the future requirement for affordable and market housing within the wider Housing Market Area (HMA) that comprises the local authority areas of Basildon, Castle Point, Rochford, Southend-on-Sea and Thurrock. The SHMA Addendum identifies a revised objectively assessed housing need (OAHN) of between 331 and 361 new homes per year for Rochford District, which takes account of any past under-delivery up to 2014. The SHMA Addendum also identifies an affordable housing need for the District of 296 affordable homes per year up to 2037.

The currently adopted policy documents and updated evidence, including SHMA and SA Scoping Report (March 2017), led the Council to identify five strategic priorities for the future development of the District:

- Strategic Priority 1: The homes and jobs needed in the area.
- Strategic Priority 2: The provision of retail, leisure and other commercial development.
- Strategic Priority 3: The provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat).
- Strategic Priority 4: The provision of health, security, community and cultural infrastructure and other local facilities.
- Strategic Priority 5: Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

The strategic priorities have been taken from the National Planning Policy Framework (NPPF) 2012, and set out the key localised challenges and issues that need to be addressed through the new Local Plan. Informed by the currently adopted policy documents and emerging evidence base, the Council has identified a range of options to address the key challenges and meet future needs of the District.

The background is a solid black field with several thin, white, straight lines crisscrossing it. One line runs from the top-left towards the bottom-right. Another runs from the top-right towards the bottom-left. A third line is nearly horizontal, starting from the left edge and ending near the right edge. A fourth line is nearly vertical, starting from the top edge and ending near the bottom edge. These lines intersect to form various geometric shapes across the page.

**Part 2: What are the SA
findings at this current stage?**

3. Introduction (to Part 2)

The aim of this chapter is to present an appraisal of the options presented within the Issues and Options document against the SA topics.

3.1 Methodology

The Issues and Options document sets out the key District-wide challenges and strategic priorities for preparing the new Local Plan. It proposes a range of different options to address key issues and provides an early opportunity for stakeholders to comment on these and suggest alternatives. It is important to note that, at this stage, the majority of options identified for key issues are not mutually exclusive. This means that an individual option is unlikely to be progressed alone; it is more likely that a combination of the options would be taken forward by the Council to address the issue in question.

The approach and method for the SA at this stage reflects the early stage of plan-making and high level nature of the Issues and Options document. An appraisal narrative has been produced to identify and evaluate the 'likely significant effects' of the options with respect to the baseline drawing on the sustainability topics and objectives identified through scoping (see Chapter 2, above) as a methodological framework. To reiterate, the sustainability topics are:

- Biodiversity
- Climate Change
- Landscape and Historic Environment
- Environmental Quality
- Land, Soil and Water Resources
- Population and Communities
- Health and Wellbeing
- Transport and Movement
- Economy

The appraisal focusses on key issues and highlights differences between the options where relevant. Where no effects or significant differences between options are identified, then options/ SA topics may not be specifically referred to within the appraisal narrative. The appraisal narrative is structured according to the five strategic priorities set out in Section 2.

Every effort is made to predict effects accurately; however, this is inherently challenging given the early stage in plan-making and high level nature of the options under consideration. Given uncertainties there is a need to make assumptions, e.g. in relation to the way in which the plan might be implemented and aspects of the baseline that might be impacted. Assumptions are made cautiously, and explained within the text (with the aim to strike a balance between comprehensiveness and conciseness/ accessibility) where necessary. In many instances, given reasonable assumptions, it is not possible to predict 'significant effects' or any significant differences between the options, but it is nonetheless possible and helpful to comment on merits (or otherwise) of the options in more general terms.

3.2 Appraisal of the options

3.2.1 Strategic Priority 1: Delivering homes and jobs

Objectively Assessed Housing Need (OAHN)

Table 2: Objectively Assessed Need (OAN) options

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

With regards to meeting the OAHN identified through the SHMA, three options have been identified under Strategic Priority 1 (SP1). All three options identified in Table 2 take positive approaches to meeting the housing need, performing positively in terms of the population and community SA topic. Option A takes the environmental constraints of the plan area into consideration, which would have positive effects on SA topics including biodiversity, landscape and historic environment, and land, soil and water resources. Whilst Option A focuses on the physical constraints of the area, it also recognises that if OAHN can't be delivered for environmental reasons, there will need to be clear evidence based justification, to ensure compliance with national policy and guidance.

Option B further supports the need to comply with national policy under the Duty to Co-operate (DtC), referring to the wider needs of the HMA and encouraging constructive engagement with local planning authorities, supporting strategic economic growth. This option would deliver a more dispersed distribution of growth across the HMA, enabling more communities and neighbourhoods to benefit from the delivery of housing, employment and associated infrastructure. For example, Option B would have positive effects on meeting the needs of the ageing population of the District, potentially allowing older people to downsize more effectively. Option A may still deliver these benefits to the community; however, this will be on a smaller scale given the constraints within the District. Option B has the potential to deliver housing away from the existing centres, being less constrained by environmental issues such as flood risk and Green Belt policy, which limit Option A.

Whilst being less constrained by the natural environment, Option B is also able to take advantage of the Districts' transport links to central London and London Southend Airport. Given the good links available locally, travel by rail is likely to continue to be a dominant mode of travel for work purposes. Taking advantage of these strong local links would likely provide for further growth of the economy, having an enhanced positive effect compared to other growth options.

Where options A and B set out strategic alternatives, Option C takes a different approach, considering a specific policy requirement. This would provide residents with the opportunity to access market housing as a priority on a percentage of new market homes. This would have significant positive effects on population, supporting community cohesion.

Whilst all options highlight reasonable approaches, the options themselves are not mutually exclusive. Decisions over the delivery of housing should be multi-dimensional, taking into consideration a variety

of factors. For example, the distribution of growth under a combination of Options A, B and C could result in the delivery of large scale development that might be more likely to provide for significant improvements to community infrastructure, be situated so as to be less harmful to the environment *and* meet existing and future residents' housing needs.

It is however noted that the benefits derived from new development will depend on siting new development appropriately through spatial planning, and creating a clear spatial strategy for the District, underpinned by a well-informed set of development management policies.

3.2.1.1 Distribution strategy

Table 3: Distribution strategy options

Option	Justification as presented in the Issues and Options document
A. Increase density within the existing residential area – which would require an amendment to our current density policy	National policy encourages the effective use of brownfield (previously developed) land, provided they are not of high environmental value (<i>NPPF</i> paragraphs 17 and 111). Land within the existing residential area could deliver more homes – particularly in proximity to town centres and sustainable transport hubs – provided this would not have a detrimental impact on design and amenity for example, and other material planning considerations. This approach would reduce pressure on land elsewhere to deliver new homes, and would likely require an amendment to our current policy on density (<i>Development Management Plan</i> policy DM2), which sets a minimum of 30 homes per hectare, but does not set out criteria for increasing density in town centres and around sustainable transport hubs for example. <i>Development Management Plan</i> policy DM3 also supports appropriate infilling and residential intensification.
B. Increase density on allocated residential sites	Similarly allocated sites that have not yet been delivered could accommodate more new homes, provided this would not have a detrimental impact on design and amenity for example, and other material planning considerations. Ensuring that identified sites are utilised efficiently is advocated in the <i>Housing White Paper</i> which seeks to discourage building at lower densities (however this is defined). This approach would reduce pressure on land elsewhere to deliver new homes.
C. Several small extensions to the existing residential area	Small extensions that relate well to the existing residential area tend to be serviced by infrastructure and services such as schools and shops. The <i>Housing White Paper</i> expresses clear support for small and medium-sized house builders, and the delivery of small and medium-sized sites to deliver new homes more quickly than larger house builders. Although this is a reasonable approach, cumulatively with the current structure of S106 and CIL, this could impact on the level of funding secured to deliver meaningful mitigation to offset new homes delivered. However, the impact may not be so severe if considered in conjunction with other options.
D. A number of fewer larger extensions to the existing residential area	Larger extensions that relate well to existing residential area are serviced by infrastructure and services such as schools and shops. These sites can contribute more to improving existing infrastructure and deliver new infrastructure through S106 and CIL to mitigate the impact of any scheme.
E. A new settlement	The Government has already expressed support for ten new garden towns and cities and 14 new garden villages. We are required to consider all reasonable options to deliver new homes within in our area. There is an opportunity to consider, and potentially deliver, a new, sustainable settlement in the District, supported by necessary infrastructure, although this would depend on developing a range of evidence.

Table 3 details the five potential options (A-E) that have been put forward for the distribution of new homes across the District. Options A and B seek to increase densities in the existing residential area, boosting utilisation in current development locations, and reducing pressure for development of land beyond existing urban areas. This is of particular significance considering 74% of the District is designated as Green Belt land.

In addition to positive effects on land resources, Options A and B will have positive impacts on the population and communities SA topic due to increasing development in well-connected areas. However, whilst Options A and B may support additional housing in areas with good access to

facilities and services, the population increase would likely place pressure on the capacity of these facilities (on the assumption of a lag between population growth and infrastructure delivery). For example, with regard to access to open space and amenity space there is an existing uneven distribution across the District, with most natural and semi-natural greenspaces focused around the Hockley/Hawkwell settlement area. To increase positive effects, development will need to be supported by high quality public spaces, green infrastructure and exemplary design. In this context Options C, D and E would have enhanced positive effects on human health, through the provision of community facilities alongside residential development. This would positively contribute towards meeting the needs of new residents, distributing amenity space equally throughout the District. Options A and B perform negatively in this respect as their delivery would exacerbate pressures on existing green infrastructure and community facilities.

Whilst Option E would include infrastructure delivery, garden villages/towns are envisaged as reasonably self-contained entities, and not extensions to existing towns or villages.⁵ In this respect, the new settlement would likely be reasonably self-sufficient in terms of services and amenities (at least eventually) if not employment, and whilst it would meet the needs of new residents in terms of infrastructure provision, it might not substantially benefit the remainder of the District (although it would help alleviate development pressures). Options C and D are considered to most positively support the economic vitality and viability of the District's town centres as they direct growth towards existing residential areas. Option D would best contribute to the improvement and delivery of infrastructure, through Section 106 and the Community Infrastructure Levy (CIL) charge on new development. The provision of larger extensions under Option D would be serviced by infrastructure and services such as schools and shops. This will help address the increased pressure on schools predicted for the District⁶, in addition to other community facility requirements.

The Issues and Options Document highlights that Option C would deliver new homes more quickly than Option D. Whilst this may meet some of the housing need at a faster pace, Option C is less likely to be serviced by or deliver significant improvement without external infrastructure and facilities, and might also impact on the level of funding to be secured through S106 and CIL. As such, with regard to offsetting adverse impacts and providing mitigation through infrastructure provision, Option D is expected to perform more positively. This is likely to be of greater significance in areas where community facilities are less accessible in the District. i.e. outside of the larger settlements of Rayleigh, Hockley and Rochford. The delivery of development serviced by infrastructure is expected to ensure the needs of new and existing residents are met, reducing the need to rely on infrastructure in the larger centres.

Options are also likely to vary in performance with regard to transport. There are existing congestion issues in the District mainly attributed to local journeys, school runs and commuting to London or elsewhere for work. As such, Options A and B are likely to direct growth towards areas that are currently experiencing highway infrastructure capacity issues, which has the potential to result in negative effects without appropriate mitigation. Options C, D and E however, include infrastructure delivery to mitigate adverse effects that may arise with development. This is predicted to be less of an issue with Option C due to the small-scale extensions proposed.

A garden village/town (Option E) would ensure that residents have access to good homes, services and recreation, whilst providing job opportunities through the construction and operational phases. However, considering environmental and policy constraints within the District, the provision of a new village/town under Option E may not be viable. It is highlighted within SP1 that a combined approach could be considered, if required. This should be explored by the Council, as the varied constraints across the District may be more appropriately managed through a range of housing delivery options. This hybrid approach has the potential to reduce pressure on the District's existing infrastructure, increase the provision of services and facilities, provide a suitable mix of housing, and also minimise effects on the District's wider landscape and townscape and historic environment.

⁵ Department for Communities and Local Government (2016) Locally-Led Garden Villages, Towns and Cities. Available [online]: <https://www.gov.uk/government/publications/locally-led-garden-villages-towns-and-cities>

⁶ Rochford District Council (2016) Rochford Authority Monitoring Report

3.2.1.2 Housing mix

Table 4: Housing mix options

Option	Justification as presented in the Issues and Options document
A. Retain the current policy on types of homes, which takes a flexible, market-driven approach to types	<i>Core Strategy</i> policy H5 is responsive to market conditions. However, it lacks guidance of the types of homes that are likely to be needed in the District, taking into consideration the existing housing stock. There is uncertainty for local communities on the type of homes that would be delivered as part of a particular scheme.
B. Include specific reference to the size and types of homes referred to in the <i>South Essex SHMA</i>	This slightly more prescriptive approach would ensure that there is an appropriate mix of homes on a particular scheme, as suggested in the <i>South Essex SHMA</i> . However, there could be an element of flexibility to ensure that the policy would not undermine the viability and deliverability of a scheme. A county or region-wide approach could be considered.
C. Continue to require new homes to meet the <i>National Technical Housing Standards – nationally described space standards</i>	Ensuring that schemes meet the national space standards would ensure that all homes are of a suitable standard. It is important however that the right balance is struck between the density of a scheme and the internal floorspace of homes. It is likely that these national standards will be reviewed in due course to be more responsive to different circumstances. This would require an update to <i>Development Management Plan</i> policy DM4 on expected standards – reference to good internal layout and being suitable for modern living is considered to still be appropriate.
D. Do not adopt specific policy on the mix of homes	National policy requires that a good mix of homes is delivered on schemes to meet the needs of a range of people. Failing to have a policy on the mix of homes is not considered to be an appropriate approach to this issue.

Table 5: Affordable homes options

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

Table 6: Proportion of affordable homes options

Option	Justification as presented in the Issues and Options document
D. Reduce the threshold for the provision of affordable homes as part of a scheme (potentially in line with emerging national policy and guidance)	The threshold for providing affordable homes is currently a scheme of 15 or more homes, or on sites greater than half a hectare. This would mean that more schemes may be eligible to provide affordable homes to buy or rent. This could have an impact on viability of smaller sites, however.
E. Retain the current threshold for the provision of affordable homes as part of a development scheme	Schemes of fewer than 15 would continue to be ineligible for providing affordable homes. Such schemes therefore would not contribute to meet local need for affordable homes; whether to rent or buy.

SP1 proposes options to support a mix of housing, including:

- Affordable housing;
- Homes for older people and adults with disabilities; and
- Care Homes.

Three potential options have been identified for the affordable housing threshold (Table 5). SP1 recognises that increasing the affordable housing threshold is not a viable option and, as such, the alternatives are to reduce (Option A) or retain (Option B) existing thresholds in the adopted Core Strategy, or not to have a policy threshold for the provision of affordable homes at all (Option C). Option B is currently in line with national policy and guidance, and would provide the greatest amount of affordable housing of the three options proposed. Options A and C are seen to be less appropriate as they would not meet the affordable housing need of the area. Table 6 shows the two options that have been identified for the proportion of affordable homes to be provided (D and E). Option E seeks to increase the proportion of homes that developers are required to provide as affordable housing, subject to viability. Whilst this option would have positive effects for the community, and support a mix of housing, it is an ambitious target. It is highlighted that this may not be possible at all sites and, as such, delivery is dependent on viability. Option D retains the existing requirement of 35%, which may be a more realistic option that a higher proportion of schemes can deliver.

Table 7: Care home options

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

Table 8: Home for older people and adults with disabilities options

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

Table 9: Houseboats and liveaboards options

Option	Justification as presented in the Issues and Options document
A. Retain the existing policy	The existing policy in the <i>Development Management Plan</i> (policy DM24) sets out a criteria based approach to houseboats to ensure that any moorings are appropriately controlled and would not have a negative impact on the environment or other users of the waterways.
B. Amend the existing policy to strengthen criteria	Houseboats have the potential to be located in the most sensitive environments; so it is important that the policies will minimise or, where possible, prevent any development negative impact, and to strengthen any necessary enforcement

Option	Justification as presented in the Issues and Options document
	action. This could include the design and size of such vessels, domestic paraphernalia and associated operational development.
C. Allocate specific areas of coastline where such uses may be acceptable	Designating an area – the ‘planning unit’ – would provide greater clarity for local communities and occupiers of such vessels. It would also help with planning enforcement. This approach would require input from Natural England and other bodies.
D. Amend the definition in the <i>Development Management Plan</i>	The definition of what constitutes a houseboat could be considered and agreed at the Essex level to assist relevant bodies with the management of such vessel on the county’s waterways.
E. Do not have a policy on houseboats	Although houseboats are not specifically referred to in the <i>NPPF</i> , we need to be mindful that any moorings and associated occupation on our rivers could have an impact on the local environment. This is not considered to be an appropriate approach.

For care homes, the options identified in Table 7 are predicted to respond positively to the needs of residents. Option A in both cases is considered to have less of a positive effect as it does not provide certainty with regards to deliverability. Enhanced positive effects are likely for Option B, which provides certainty through policy, contributing to mixed and inclusive communities. Option B is encouraged as it looks to ensure that all residents can continue to live healthy and active lives within existing communities

Options for homes for older people and adults with disabilities (Table 8) take the same approach as above, and as such option B is the better performing option.

Table 9 shows that mixed and inclusive communities are further supported through Options A-D regarding the mooring of Houseboats and Liveboards, which support this type of development.

Table 10: Gypsy, traveller and travelling showpeople options

Option	Justification as presented in the Issues and Options document
A. Retain the current criteria-based policy (<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 all households that were identified in 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 needs, and is in the early stages of delivery.
D. Consider a mobile home policy for those no longer falling within the Gypsy and Traveller definition	An alternative to providing for all households on the allocated sites is to develop a specific criteria-based policy and allocation for those which do not meet the definition of a Gypsy and Traveller in the <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</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 & Traveller provision	This is not considered to be an appropriate option as there is a requirement, as there is for market, affordable and other types of homes, to ensure that adequate provision is made for Gypsies and Travellers through the plan-making process. If provision is not made for these groups over the plan period, this would be contrary to the Equalities Act 2010, for example, other legislation, and national policy. The plan would likely fail the legal and soundness tests at the examination stage.

Table 10 shows the options put forward under SP1 to meet Gypsy and Traveller needs. An Essex Gypsy and Traveller Accommodation Assessment (GTAA 2017) identifies that there is a need for six additional Gypsy and Traveller pitches for the period 2016 to 2033; and that a further need for three pitches may also arise. There is a need for between 10 and 12 pitches for those travellers that do not meet the planning definition.⁷ No need has been identified for Travelling Showpeople plots in the District.

Of the options, Options A and B appear to be most achievable, as they would meet the identified need under existing policies whilst minimising adverse impact on the wider environment. Option B supports the provision of a single site under the adopted Allocations Plan policy GT1, which is in a relatively sustainable location (an open and accessible brownfield site adjacent to allocated employment land)⁸ and, due to the size of the site, may have flexibility to meet potential additional demand post 2018. Adverse effects are expected through Option C, which seeks to allocate a smaller number of sites throughout the District, possibly impacting on the purposes of the Green Belt. This has the potential to negatively affect landscape, land, soil and water resources, and human health; however, effects could be mitigated depending on specific development design principles. Options D and E look to develop a more detailed 'criteria based' policy for site allocation, which again may adversely affect the natural environment through dispersed growth. However, the options may include criteria which focuses growth on brownfield land, or in urban locations close to existing development and with access to facilities and amenities. Further policy detail is likely needed to gain a comprehensive understanding of residual effects under Options D and E. Nonetheless, Options D and E would increase provision for Gypsies and Travellers, having a positive effect on these communities through responding positively to local need. Option F is a 'do nothing' scenario and as such performs less positively against population and communities and, as the Council says, is not an appropriate option.

3.2.1.3 Economic growth

Table 11: Employment and economic growth options

Option	Justification as presented in the Issues and Options document
A. Continue to support employment growth within the current employment growth policy	<i>Core Strategy</i> policy ED1 supports a number of key initiatives to deliver new local job opportunities, and business start ups and business growth in the District. These initiatives are still considered to be of importance over the next 20 years to ensure economic growth. However this could benefit from minor updates to reflect new evidence.
B. Update the current employment growth policy to include reference to broadband	Despite the roll out of the Superfast Essex broadband programme, there is a need to support continued broadband improvements in the District, as broadband is particularly poor in the rural eastern extent of the District which can impact on rural diversification opportunities, as well as the growth of home businesses. Broadband is considered in more detail in the 'Supporting Health, Community and Cultural Facilities' chapter. <i>Core Strategy</i> policy ED1 could benefit from updating to reflect this need.
C. Update the current employment growth policy to further support new businesses	<i>Core Strategy</i> policy ED1 makes reference to an Eco-Enterprise Centre in the District, which would offer invaluable support and advice for early stage businesses at the most vulnerable point in their lifecycle. However the <i>Grow-On Space Feasibility Study 2016</i> recommends that there is a requirement for grow-on space for local businesses in the District to support and nurture them. <i>Core Strategy</i> policy ED1 could benefit from updating to reflect this need.
D. Update the current employment growth policy on skills	Our current policy (<i>Core Strategy</i> policy ED1) supports the development of a skills training academy to enhance the skills base within the District and match local skills with locally available employment opportunities. Whilst this is still an aspiration, deliverability is likely to be an issue. However up-skilling of our workforce is important and through promoting apprenticeships and working with local businesses this could be supported through the plan-making process.
E. Include specific reference in the current employment growth policy to tourism and rural	There is a need to support tourism and appropriate forms of rural diversification in the District to deliver local, rural job opportunities and promote rural economic growth. This is considered in more detail in the 'Supporting Health, Community and Cultural Facilities' chapter.

⁷ Department for Communities and Local Government (2015) Planning Policy for Traveller Sites available [online] <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites>

⁸ Rochford District Council (2014) Local Development Framework Allocations Plan

Option	Justification as presented in the Issues and Options document
diversification	
F. Include specific reference to supporting sustainable travel options and promoting highways improvements	The highway network, and a lack of appropriate and realistic sustainable transport options, can impact on the prosperity of local businesses. It is important that highway improvements and sustainable transport options are supported and promoted to improve accessibility to local jobs for all our working age population, particularly those without access to private transport. This is considered further in the 'Delivering Infrastructure' chapter.

Table 12: Economic growth options over the next 20 years

Option	Justification as presented in the Issues and Options document
A. Develop specific policies for each employment site to protect certain uses	This would reflect the recommendations within the <i>EDNA 2017</i> to continue to promote the allocated employment sites, predominantly for business use. The <i>Employment Land Study</i> recognises that there has been an increase in leisure uses on some sites which could detract from their impression as 'successful' business locations, such as Brook Road industrial estate. Rochford Business Park also does not have a business ('B class') focus.
B. Reconsider the allocation of Rawreth and Star Lane industrial estates back to employment	These two industrial estates were reallocated for residential use as they were considered to be 'bad neighbour' sites (Rawreth and Star Lane industrial estates). However there has been no interest to date (as of June 2017) in delivering new homes on these sites. The <i>EDNA 2017</i> also considered that they are generally well occupied and suggests that they could be reallocated back to employment use to support the existing activities. The impact on our strategy for delivering new homes for the future however, would need to be carefully considered. Also see Option C below.
C. Review new employment land allocations that do not have planning permission	<p>Three new sites have been allocated for employment land up to 2025. We are required by the NPPF to reconsider whether sites have a reasonable prospect of being delivered. Sites should not just be carried forward into a new plan.</p> <ul style="list-style-type: none"> Land to the north west of London Southend Airport in Rochford – The majority of this site is in the process of being delivered, although a reserved matters application has not yet been received for the site (as of June 2017). The remainder of the site however is being promoted for residential uses, despite commercial interest in developing the site to support local employment opportunities in accordance with our Core Strategy and JAAP. Consideration could be given to reallocating this part of the site to Green Belt. Michelins Farm in Rayleigh – There has been commercial interest in this site and, given its strategic location, it is expected that this site will be delivered for employment use over the current plan period (up to 2025). The <i>Employment Land Study Update 2014</i> notes that it is located within the strongest commercial market sub-area of Rayleigh and provides an accessible and visible development opportunity. Land south of Great Wakering – Given the absence of interest in redeveloping the existing employment land at Star Lane, and its continued occupation by vibrant businesses is it not envisaged that this site will come forward for employment use over the plan period. There is however commercial interest in developing the new allocated land in the Allocations Plan for business use.
D. Retain current strategy and allocate additional employment land	The <i>EDNA 2017</i> recognises that in addition to our current strategy for delivering new homes and jobs in the District, there is a further need to identify land for employment uses to support local economic growth in the future. Given the lack of interest in delivering new homes on Rawreth and Star Lane industrial estates in particular to date, parts of this strategy may need to be reviewed.
E. Promote improvements to quality of building stock and intensification of existing sites	The <i>Employment Land Study</i> notes that there are some opportunities to improve the quality of existing building stock (noting that there some uses are more suited to a higher building quality) and some potential to deliver further units on the existing industrial estates, where appropriate.
F. Strengthen policy	Both the <i>EDNA 2017</i> and the <i>Employment Land Study Update 2014</i> recognise

Option	Justification as presented in the Issues and Options document
stance on access improvements	that there are challenges with access to some employment sites. Purdeys industrial estate in Rochford in particular would significantly benefit from access improvements which could unlock potential opportunities to intensify the site.
G. Do not have a policy on employment land	This is not a feasible option as there is evidence of an increase in demand for industrial units and offices over the next 20 years. An increased supply of quality building stock on sustainable, well located sites is needed to meet this demand.

Rochford District is home to 3,320 businesses (2012) that provide a diverse range of jobs over an equally diverse range of sectors. The District has an economic participation rate of 70.8% which is in line with the regional and national context (**Figure 2**). 65.4% of the economically active population is in employment, which is the highest among all benchmarks. The unemployment rates in the District have remained consistently low⁹.

Figure 2. Resident population age structure (2011)



(Source Rochford District Council (2015) Employment Land Study Update 2014)

The six options identified in Table 11 to support employment and economic growth in the District take similar approaches; with the exception of Option A which is not seen to be a feasible option by the Council. Options B to F are suggestions for updates to the existing Core Strategy policy ED1, which, if the plan was being ambitious, could all conceivably be reflected in Local Plan policy. The implementation of a number of, if not all options, would have long-term positive effects on the economy through the delivery of improved tourism, skills, and infrastructure. The tourism and visitor economy in particular provides significant opportunities for growth in the District, and should be a focus for economic development.

SP1 further highlights seven potential options for helping to deliver economic growth via the development of employment sites in the District (Table 12). Again, options are not mutually exclusive, and should be considered in-combination to fully meet the District’s needs and aspirations. All options look to promote land for employment use which would contribute positively to the growth of the economy. Option A reflects the recommendations within the South Essex Economic Development Needs Assessment (EDNA) 2017¹⁰ to continue to promote the allocated employment sites, predominantly for business use. This will support the economic vitality and viability of the District’s centres.

Options B, C and D recognise that there is a need to identify additional land for employment use to support local economic growth in the future. Option C looks to take full advantage of the opportunity

⁹ Rochford District Council (2015) Employment Land Study Update 2014

¹⁰ South Essex Economic Development Needs Assessment (2017)

for new deliverable sites such as Michelins Farm in Rayleigh. These options would actively promote the development of new employment areas to serve towns and villages throughout the District, whilst also utilising the transport network available and improving accessibility through Option F. This would have long term positive effects for population, human health and transport, encouraging sustainable modes of transport such as walking and cycling where possible. It is therefore considered that a combination of Options A-F should be progressed to meet the future economic needs of the District.

Table 13: London Southend Airport options

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

Table 13 shows that options A-C for London Southend Airport seek to retain and update existing planning policy set out in the adopted Core Strategy, Allocations Plan and London Southend Airport and Environs Joint Area Action Plan (JAAP). Option D seeks to continue support for surface access improvements in and around the airport. None of the options are mutually exclusive and it is important for the new Local Plan to support proposed development within and around the airport as well as seek new opportunities if they arise.

3.2.1.4 Tourism and rural diversification

Table 14: Tourism and rural diversification options

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

Option Justification as presented in the Issues and Options document

The rural economy plays a large part in the economic vitality of the District. In March 2011, 23% of Rochford District based businesses were classified as being rural businesses, showing the strength of the District's rural economy.¹¹ However, it is also recognised within this context that consideration must be given to the openness of the Green Belt. The Council believes that it will be possible to promote rural tourism in a sustainable manner which respects biodiversity and the character of the Green Belt.¹²

The District's important tourism offer and historic and cultural legacy provides significant opportunities for the economy. Rochford District has been identified as the 'green' part of the Thames Gateway and as having the potential to be the arts and cultural opportunities area for the sub-region. A focus on tourism in the District can bring many broader benefits that will contribute to economic growth for local communities. For example, there is opportunity in the District for tourism to diversify the economy, responding to the limited number of facilities to enable people to live and work in the District (including bed and breakfasts, small hotels, and temporary camp sites).

SP4 identifies two viable options for tourism and rural diversification (Options A and B, Table 14), as Option C is not seen to be appropriate by the Council. Option A seeks to retain existing policy, whilst Option B seeks to expand the existing approach to include other forms of rural diversification. Promoting the development and diversification of agricultural and other land-based rural businesses would provide a range of positive effects for SA topics including the economy, population and communities as well as human health. Option B would provide benefits to businesses in rural areas, whilst also supporting communities and visitors, and respecting the character of the countryside through sensitive management and appropriate location of development (i.e. taking into consideration potential transport and accessibility issues in rural settings). Positive effects are also expected for biodiversity and the historic environment as the District's tourism opportunities are focused primarily on the themes of heritage, countryside and coastline. However, tourism also has the potential to cause damage to the environment, through increased footfall, disturbance, littering, and pollution. As such, the maintenance and enhancement of policies under Options A and B would contribute towards the sustainable economic growth of the District.

3.2.2 Strategic Priority 2: Supporting Commercial Development

3.2.2.1 Town, Village and Neighbourhood Centres

Table 15: Town centre options

Option	Justification as presented in the Issues and Options document
A. Retain current <i>Core Strategy</i> policies	The broad town centre policies within the <i>Core Strategy</i> are considered to be appropriate in directing retail development to the District's town centres through the sequential approach supported by the <i>NPPF</i> .
B. Retain current policies in the <i>Rayleigh Centre Area Action Plan</i>	The area specific policies within the <i>Rayleigh Centre Area Action Plan</i> are considered to strike an appropriate balance between promoting the vibrancy and vitality of the town and facilitating appropriate development opportunities whilst respecting the historic character of Rayleigh.
C. Retain current policies in the <i>Rochford Town Centre Area Action Plan</i>	The area specific policies within the <i>Rochford Town Centre Area Action Plan</i> are considered to strike an appropriate balance between promoting the vibrancy and vitality of the town and facilitating appropriate development opportunities whilst respecting the historic character of Rochford.
D. Retain current policies in the <i>Hockley Area Action Plan</i>	The area specific policies within the <i>Hockley Area Action Plan</i> are considered to strike an appropriate balance between promoting the vibrancy and vitality of the town and facilitating appropriate development opportunities whilst respecting the individual character of Hockley.
E. Review the town centre	These plans were adopted post-publication of the <i>NPPF</i> and <i>PPG</i> and are considered to be fit for purpose. In addition, opportunity sites and employment

¹¹ Rochford District Council (2014) Rochford District Growth Strategy

¹² Ibid

Option	Justification as presented in the Issues and Options document
Area Action Plans	land identified in the plans have been assessed within our evidence base.
F. Do not have policies on town centres	This approach is considered to be contrary to the <i>NPPF</i> and is not considered to be appropriate.

Rochford District is bounded by the local authority areas of Southend-on-Sea, Castle Point, Basildon and Chelmsford. The District itself contains three main town centres - Rayleigh, Hockley and Rochford - which are located to the west of the District. These main centres each provide for the local shopping and leisure needs of their communities, and are complemented by a number of smaller village and neighbourhood centres dispersed throughout the District.

SP2 identifies six options for the growth of the town centres over the plan period (Table 15). Of the six, Options A-E seek to retain/review existing planning policy, while Option F is to avoid having town centres policies; however, this is contrary to the *NPPF*. Each of the three town centres is currently supported by an Area Action Plan (AAP) which provides a planning framework to guide their evolution and secure their future prosperity. In light of the AAPs, Option E intends to review the documents, however this is an arguably futile exercise, considering the plans were adopted post-publication of the *NPPF* and *PPG* and are considered to be fit for purpose. In addition, opportunity sites and employment land identified in the AAPs have been assessed within the Council's evidence base, providing transparency in relation to individual development options. Options A-D therefore consider that existing policies are appropriate for directing the growth of the town centres throughout the plan period. The options set out are not 'either/or' and instead a combined approach should be taken which addresses all of the District's three main centres, seeking opportunities to maintain and enhance their vitality.

Table 16: Village and neighbourhood centre options

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

National and local policy indicates that it is important for the District's town centres to maintain and strengthen their role in the retail hierarchy. The smaller centres should continue to perform a more local function meeting day to day shopping and service needs.¹³ Table 16 sets out the options proposed for village and neighbourhood centres, which again seek to retain existing policies with no amendments. The *Core Strategy* and *Development Management Plan* policies are considered to be fit-for-purpose, supporting the function of the District's village and neighbourhood centres, having a positive effect on human health and population. The options set out are not 'either/or' and instead a combined approach, as suggested above, would best support the growth of the District's village and neighbourhood centres.

¹³ Rochford District Council (2015) Retail and Leisure Study Update

3.2.3 Strategic Priority 3: The provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)

3.2.3.1 Transport

Table 17: Local road network options

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

Table 18: Strategic road network options

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

SP3 places great focus on transport and accessibility. Key transport constraints in the District include:

- High levels of car ownership in the District;
- Limited access to public transport in many areas;
- Capacity issues on the highway network;
- Traffic hotspots on A127 and A13; and
- A lower proportion of people travel to work by bicycle or on foot than regionally or nationally.

It is recognised that future growth in the District will increase pressure on existing infrastructure, and as such SP3 addresses road capacity issues by identifying four options for the management of the local highway network (Table 17). Options seek to improve congestion and manage the existing high level of out-commuting to employment locations outside the District, most notably London. Options range from a no policy option, to retaining current planning policies, to prioritising specific sections of the road network that require the most attention. These specified areas are local roads between Rayleigh, Hockley and Rochford (B1013) (Option B), and the east to west connection north of Rayleigh, Hockley and Rochford (Option C). Continuing to work with neighbouring local authorities (and Essex County Council as the Highway Authority) through Options B and C is predicted to have an enhanced positive effect on transport, promoting strategic and more localised improvements to the road network. This will positively contribute towards the growth of the wider economy, through improving transport and accessibility throughout the District. Indirect positive effects are also anticipated in relation to climate change, air quality, human health, and population.

Two further options are identified in Table 18 for managing the strategic road network. Of these, Option A is seen to be the Council's preferred approach, supporting improvements to the A127 road network. The A127 is a key strategic road serving South Essex providing an important east to west connection between Rochford District and Basildon, Castle Point and Southend Boroughs, which has known capacity and congestion issues. Option A promotes junction improvements which will be allocated through the Local Plan. This will reduce congestion at key problem areas, contributing towards improved transport networks, with indirect positive effects on air quality, and health and wellbeing.

Table 19: Sustainable travel options

Option	Justification as presented in the Issues and Options document
A. Retain current policies on public transport	The policy on public transport is considered to be fit for purpose, in promoting the connectivity of schemes to the public transport network as set out in <i>Core Strategy</i> Policy T3.
B. Consider the development of a park and ride facility	We have a current policy on the South Essex Rapid Transit (SERT) which was envisaged as a network of priority bus routes to connect Basildon, Southend, Thurrock and London gateway Port, and other key development sites and services (<i>Core Strategy</i> Policy T4).
C. Retain the current policy on travel plans	<i>Core Strategy</i> Policy T5 requires new schools, visitor attractions, leisure uses and larger employment schemes to prepare and implement travel plans. Schemes over 50 homes are required to prepare a travel plan.
D. Lower the threshold to require travel plans to be prepared for schemes under 50 homes	Only schemes over 50 homes are required to prepare a travel plan within <i>Core Strategy</i> Policy T5. If we consider smaller sites to deliver new homes as part of our housing delivery strategy in the future, this could have a cumulative impact. The <i>NPPF</i> requires schemes which would generate significant amounts of movement to prepare a plan; our policy could be applied to more schemes, which cumulatively could have an impact.
E. Retain the current policy on walking and cycling	Our current policy on walking and cycling is considered to be fit for purpose in promoting these alternative modes of travel within schemes (<i>Core Strategy</i> Policy T6). Studies have been and will continue to be developed to explore the potential for new routes within the constraints of the existing highway network. We will continue to work closely with Essex County Council on the development of the <i>Rochford Cycling Action Plan</i> . The policy made need minor amendments as this plan progresses.
F. Do not have policies on sustainable travel	This approach would involve not supporting improvements to public transport, walking or cycling in policy – particularly the more rural east, and would be contrary to the <i>NPPF</i> .

Table 19 shows the six options which have been identified for sustainable travel; a key issue for the District due to the high levels of car ownership, and limited access to public transport in a number of areas. Access to sustainable transport varies significantly across the District, with the west having good transport links to London. Options B-E propose actions which would encourage the use of more sustainable transport modes and reduce reliance on the private vehicle, supporting schemes such as Park and Ride, and the development of the Rochford Cycling Action Plan.

Options B-E are not mutually exclusive and the Council should consider a combined approach to support the aspirations of the Plan. For example, Option C alone would not sufficiently address the scale of growth and potential resulting pressure on the transport network that is predicted. As such, the Council should support an option which facilitates a variety of approaches to sustainable travel. This would have significant positive effects for transport and traffic and indirect positive effects for climate change, air, human health and population.

Table 20: Communications infrastructure options

Option	Justification as presented in the Issues and Options document
A. Retain the existing policy on telecommunications infrastructure	The existing policy is considered to be generally fit for purpose, and provides a sufficient basis for the determination of a planning application relating to telecommunications infrastructure. However the existing policy does not take a proactive approach to new technologies, and in particular lacks specific reference to broadband infrastructure.
B. Amend the existing policy to include specific reference to improving broadband and mobile coverage	As stated above, the existing policy is sufficiently comprehensive and detailed providing the necessary guidance to successfully determine a planning application, however it is very passive. The policy could be made more proactive to seek to improve broadband and mobile coverage in areas designated as lacking for the benefit of the local and rural economies and communities. The policy has room to expand in order to introduce a standard for new developments to install fibre-to-the-home (or business) cables during their construction to ensure all new developments are suitably provided for.
C. Ensure that all commercial and residential developments over a certain threshold are conditioned to deliver appropriate broadband infrastructure	Ensuring that all commercial and residential developments, above a threshold, provide broadband infrastructure would help to ensure that the basic needs of the future occupants of these buildings are met with regards to broadband connectivity. One way to achieve this would be through the use of a condition attached to any relevant planning consent which requires agreement of details relating to the provision of broadband infrastructure as part of, and serving, the approved development.
D. Do not have a policy on telecommunications infrastructure	We could rely on national policy for guidance on development of telecommunications infrastructure in the District, however a specific local policy strengthens our ability to ensure that any proposed telecommunications infrastructure is sensitive and acceptable, and may help to deliver improvements to the wider telecommunications connectivity of the District.

Transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and human health. SP3 proposes options for managing communications infrastructure, which can reduce the need to travel. Fibre optic broadband can facilitate working from home and remote working, and encourage enterprise and innovation. Of the four options proposed (Table 20, Options A-D), Options B and C should be considered together, as both support policy improvements which would benefit local and rural communities, ensuring new developments are suitably provided for.

3.2.3.2 Flood risk

Table 21: Flood risk options

Option	Justification as presented in the Issues and Options document
A. Retain the existing flood risk policy for coastal flooding	<i>Core Strategy</i> policy ENV3 aims to resist inappropriate developments in areas at risk of coastal flooding, wherever possible, following the sequential and exceptions test approach. The exception is some brownfield (previously developed) land. This is in line with national policy and is considered to be an appropriate policy position.
B. Revise Core Strategy policy ENV3	If this policy was revised, the brownfield (previously developed) land exception in flood zone 2 and 3 could be removed. However the approach in policy ENV3 is considered to an appropriate balance in certain circumstances to avoid development on greenfield land elsewhere.
C. Continue to apply SUDS policies	SUDS are crucial in keeping runoff and discharge rates similar to those that would naturally occur in order to mitigate possible flash flooding events. <i>Core Strategy</i> policy ENV4 sets out when schemes would be required to include a SUDS element. This is supplemented by <i>Development Management Plan</i> policy DM28 covers which relates to smaller developments. These policies are considered to be fit-for-purpose in managing surface water flood risk from new developments, but could be combined into one succinct policy.
D. Do not have a policy on flood risk	This is not an appropriate approach and would be contrary to national policy.

With regard to climate change adaptation, **Figure 3** shows fluvial flood risk for the District. There are a number of main rivers draining Rochford District, mainly the tributaries of the Tidal River Roach and the Tidal River Crouch. As a result, a large proportion of the District falls within the Environment Agency's fluvial and tidal flood zones 2 and 3.

SP3 identifies four options (Table 21, Options A-D) in relation to minimising flood risk. Of these four, Options A and C seek to retain existing policies. Option B seeks to revise Core Strategy Policy ENV3 to remove the reference to the development of brownfield (previously developed) land in flood zone 2 and 3. However, the Council recognises that the approach in policy ENV3 is considered to be an appropriate balance in certain circumstances to avoid development on potential Green Belt land elsewhere. Additionally, ENV3 requires development on brownfield land in flood zones 2 and 3 to pass the exception test and be able to accommodate the necessary flood defence infrastructure, mitigating any potential adverse impacts. As such, it is recommended that a combination of Options A and C be progressed to help manage and reduce flood risk.

3.2.3.3 Renewable energy

Table 22: Renewable energy options

Option	Justification as presented in the Issues and Options document
A. Retain the current policies on renewable energy	<i>Core Strategy</i> policies ENV6, ENV 7 and ENV 8 are considered to be fit-for-purpose in addressing proposals for renewable energy generation and should be retained.
B. Include a specific policy on electric vehicle charging points	As and when the need arises, which could be within the next plan period, our current policy could be amended or a new policy be proposed to manage the introduction of electric vehicle charging points in car parks and other appropriate areas such as new developments.
C. Do not have a policy on renewable energy	Such an approach is not considered to be appropriate as national policy requires us to consider the impact of renewable energy schemes.

Increasing the amount of energy from renewable and low carbon technologies will help to make sure the UK has a secure energy supply, reduce greenhouse gas emissions to slow down climate change and stimulate investment in new jobs and businesses.¹⁴

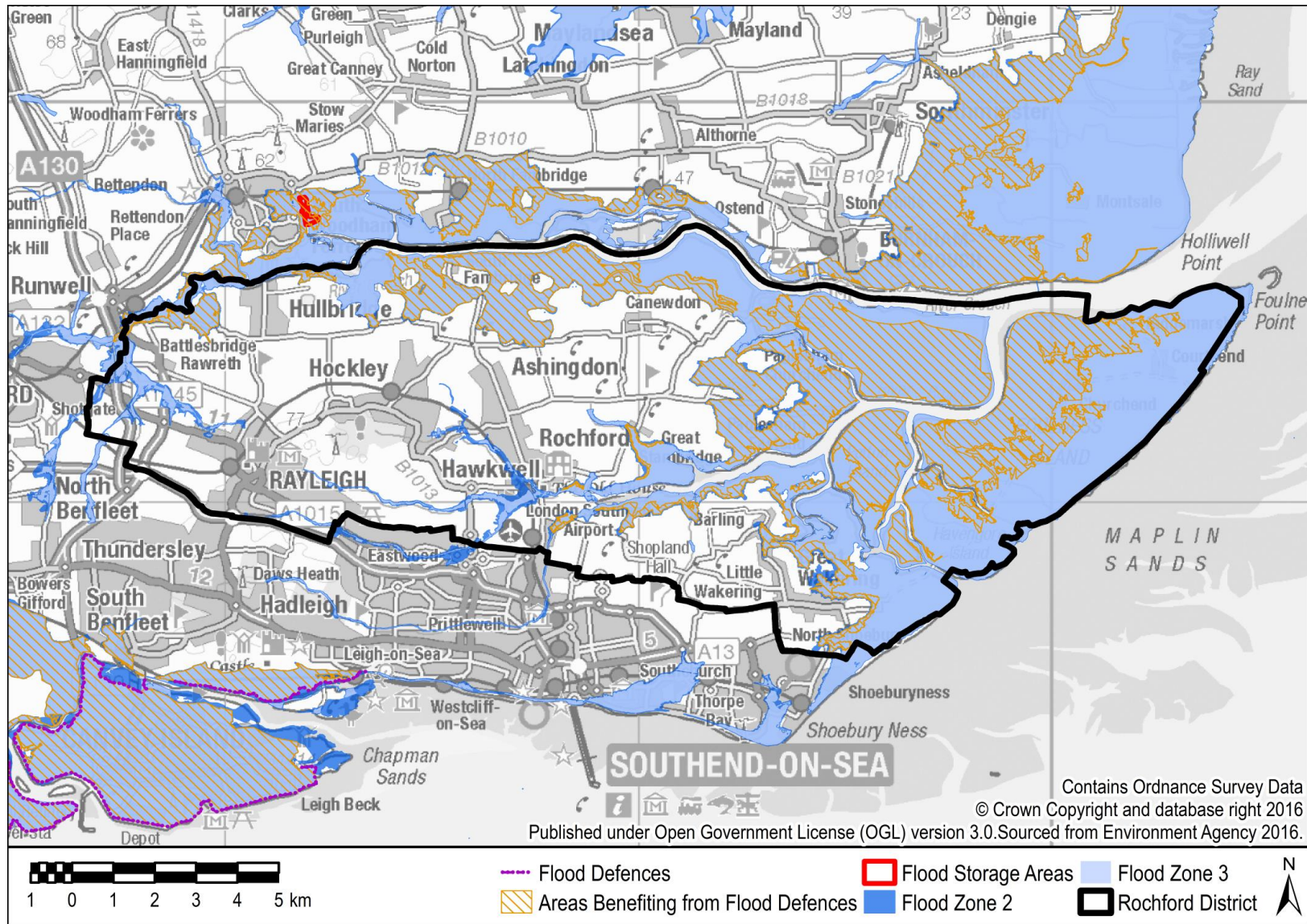
SP3 recognises the contribution renewable energy can make, highlighting three options to support renewable energy provision within the District. There are no plans currently for developing large-scale renewable energy projects in the District; however, the Council will seek to reduce carbon emissions through supporting the development of small-scale renewable energy projects.¹⁵

Of the options shown in Table 22, Option A seeks to retain existing policy, while Option B is more ambitious, proposing the addition of a specific policy on electric vehicle charging points. The Issues and Options Document states that electric vehicles (EV) are becoming an increasingly common sight throughout the District, and as a result, the means to charge these vehicles away from the home will become ever stronger. Option B takes into consideration EV trend data, and plans positively for the future of the District. It positively addresses climate change mitigation, and is likely to have a significant positive effect on sustainable transport through encouraging the use of EVs. Option A is also considered to have a positive effect on climate change mitigation, encouraging renewable energy generation and infrastructure. It is suggested that a combination of Option A and Option B would best accommodate and encourage renewable energy provision in the District.

¹⁴ Department for Communities and Local Government (2015) Planning Practice Guidance: Renewable and Low Carbon Energy

¹⁵ Rochford District Council (2014) Local Development Framework Core Strategy

Figure 3: Flood Risk



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

3.2.4.1 Community facilities

Table 23: Community facilities options

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

Table 24: Healthcare options

Option	Justification as presented in the Issues and Options document
A. Retain the current policy on healthcare provision	Our current policy in the <i>Core Strategy</i> is considered to be appropriate in setting out the broad approach to support future healthcare provision and to work with relevant partners to ensure effective planning for new facilities. The policy could have a minor update to reflect the role of the Castle Point and Rochford CCG. For smaller sites this relies on calculations from the CCG on potential impact of schemes.
B. Lower the threshold for the requirement to carry out a Health Impact Assessment	The <i>Housing White Paper</i> supports smaller sites to deliver new homes, which may mean that such sites are not captured by this policy – and so the cumulative impact would not be effectively considered. The threshold could therefore be lowered to ensure that any development over a certain size – for example 15 homes – would have to assess their impact.
C. Ensure that land is specifically allocated for healthcare	There is a need to ensure that land set aside for healthcare is specifically allocated for the use, so that this is reflected in the value of the land which would have a positive impact on viability.
D. Do not have a policy on meeting healthcare needs	This approach would not enable us as the local planning authority to work effectively with the CCG to ensure that there is adequate healthcare provision in the future to meet the needs of local communities. In addition it would not meet the requirements of the Duty to Co-operate or the provisions within the <i>NPPF</i> . This is therefore not an appropriate option.

Strong, vibrant communities can help create healthy living environments which should, where possible, encourage physical activity, community engagement and social capital. Rochford District contains a range of community facilities (e.g. village halls, health facilities, post offices, space for recreation), which are most abundant in the larger settlements of Rayleigh, Hockley and Rochford. SP4 identifies three options for community facilities (Table 23), of which Option B is most realistic in the context of the plan. Option B supports appropriate strengthening of community infrastructure given anticipated population growth over the next 20 years. Whilst Option A would continue to support community facilities, Option B looks to include a provision to resist the conversion of community facilities to residential use, positively affecting health and population through the maintenance of existing facilities. Further positive effects could be gained by supporting the provision of new community facilities outside of the key centres. This would improve access across the District, relieve pressure on existing facilities, and reduce health inequalities.

SP4 further discusses healthcare provision; Table 24 sets out the four options identified for delivery throughout the District. Of the four, Options A-C are identified as viable options, with Options B and C performing most positively. Options B and C should be considered in-combination, as both take separate approaches to meeting local healthcare needs: Option B looks to assess impact of development whilst Option C ensures that there is adequate land allocated for healthcare facilities. Rochford has an ageing population and it is recommended that the plan aspires to meet the need of the older population, which is projected to increase in the next 20 years.¹⁶ Supporting older people to have a healthy and active lifestyle can have a positive impact on local healthcare demands and capacity levels. This will result in positive effects on the local economy, human health and population and communities.

3.2.4.2 Education and Skills

Table 25: Education and skills options

Option	Justification as presented in the Issues and Options document
A. Retain the current policies on schools provision	The detail of current policies in the <i>Core Strategy</i> – specifically policies CLT2 and CLT3 – are considered to be appropriate in setting out the broad approach to facilitating the delivery of new schools, school expansion and financial contributions to deliver improvements. However, some elements of the policies may need updating to reflect planned delivery and future need.
B. Ensure that land is specifically allocated for schools	There is a need to ensure that land set aside for education is specifically allocated for the use, so that this is reflected in the value of the land which would have a positive impact on viability.
C. Do not have a policy on meeting education needs	This approach would not enable us as the local planning authority to work effectively with Essex County Council and local schools to ensure that there is adequate school provision in the future to meet the needs of local communities. In addition it would not meet the requirements of the Duty to Co-operate or the provisions within the <i>NPPF</i> . This is therefore not an appropriate option.
D. Update the current employment growth policy on skills and continue to support skills development through a skills training academy	Our current policy (<i>Core Strategy</i> policy ED1) supports the development of a skills training academy to enhance the skills base within the District and match local skills with locally available employment opportunities. There is mismatch is coupled with a shortage of specific skills within our District. Whilst the delivery of a skills training academy is still an aspiration, deliverability may be an issue. In the interim, up-skilling of our workforce is important and through promoting apprenticeships and working with local businesses this could be supported through the plan-making process and working with local colleges to address identified skills gaps arising in the future.
E. Promote apprenticeships through planning	Similar to proposals within neighbouring authorities, we could consider conditioning approved applications for new, extension to or the replacement of employment provisions to require businesses to work with us and our partners to offer apprenticeships and further education training to residents.

Table 26: Early years and childcare facilities options

Option	Justification as presented in the Issues and Options document
A. Retain the current policies on schools, early years and childcare	The detail of current policies in the <i>Core Strategy</i> – specifically policies CLT2 and CLT3 – are considered to be appropriate in setting out the broad approach to facilitating the delivery of new schools, early years and childcare facilities, school expansion and financial contributions to deliver improvements. However, some elements of the policies may need updating to reflect planned delivery and future need.
B. Ensure that land is specifically allocated for schools, early years and childcare	There is a need to ensure that land set aside for education is specifically allocated for the use, so that this is reflected in the value of the land which would have a positive impact on viability.

¹⁶ South Essex SHMA

Option	Justification as presented in the Issues and Options document
C. Do not have a policy on early years and childcare facilities	This approach would not enable us as the local planning authority to work effectively with Essex County Council and local schools to ensure that there is adequate school provision in the future to meet the needs of local communities. In addition it would not meet the requirements of the Duty to Co-operate or the provisions within the <i>NPPF</i> . This is therefore not an appropriate option.

Table 25 lists the five options that have been identified to plan for education and skill development in Rochford. There has been significant increase in school pupils since 2011¹⁷, a trend that is likely to increase, and is raising concern within local communities about the future capacity of schools. Option B positively addresses this, seeking to ensure that there is land specifically allocated for schools. In this context, the Council have been working closely with Essex County Council to deliver improvements to education provision up to 2025.

Option C does not perform well as it is clear that a policy on schools provision is needed to direct and co-ordinate future development. In terms of Option A, while policies CLT2 and CLT3 are supported, the option should arguably be revised to '*update and retain current policies*'. This would allow for an informed approach to school provision /improvements in the District, considering planned delivery and future needs. As stated in the Issues & Options document (2017), widening the choice in education and taking a positive, proactive and collaborative approach to meeting future need is supported by national policy.

Options D and E are distinct from Options A-C, considering how to support the skilled workforce in the District through training academies and apprenticeships, rather than schools provision. Options D and E should be considered in combination, as they both contribute towards developing a continual supply of skilled young workforce. Access to all forms of skills training and education can improve the health and well-being of communities through providing greater choice to access employment opportunities. As such, promoting both Options D and E would support a range of skill development to bridge the skills gap in the District and promote long-term economic prosperity. Overall, a combined approach of Options C, D, E and possibly A (if updated) is preferred.

SP4 further discusses options for childcare facilities (Table 26), highlighting that Essex County Council is responsible for meeting certain statutory responsibilities relating to the provision of early years and childcare services within the District. While Essex County Council's Early Years and Childcare service are beginning to develop new facilities in the hotspot areas where there is likely to be a shortfall, data still demonstrates a deficit of places in specific wards. These wards include Rayleigh Centre, Foulness and Great Wakering, and Hullbridge. Considering the extended Government funding implemented in September 2017, and therefore the likely increase in shortfall of places, Option 2 is supported. Ensuring that land set aside for education is specifically allocated for the use will have positive effects on viability and deliverability, reducing deprivation in key locations. Option A is considered to be broadly appropriate in terms of setting out the approach for childcare and early years facilities, however updates to policy would be helpful in responding to the future needs of residents. For example, where family hub delivery sites are at capacity, additional services can be planned and provision delivered. Option C is not seen to be viable, and would not meet the requirements of the Duty to Co-operate or the provisions within the *NPPF*.

3.2.4.3 Open space and recreation

Table 27: Open space and outdoor sports and recreation options

Option	Justification as presented in the Issues and Options document
A. Retain, and where necessary update, the existing overarching policy on open spaces	<i>Core Strategy</i> policy CLT5 provides our broad approach to the protection of existing, and requirements for new, public open space across the District. It is considered to be fit for purpose but would benefit from updating where necessary.
B. Retain, and where necessary update, our	<i>Allocations Plan</i> policy OS1 allocates all of the areas which are currently identified and are in use. This may need to be updated for

¹⁷ Rochford District Council (2017) New Local Plan: Issues & Options document Accessed Oct 2017

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

National policy recognises that access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Recreation and open spaces within the District include:¹⁸

- Over 30 football pitches
- 27 play spaces for children
- Sweyne Park, Rayleigh – offering children’s play space, a wildlife area with environmental ponds and 2km bridle path over 57 acres
- Hockley Woods – ancient semi-natural woodland designated as a Site of Special Scientific Interest (SSSI) and Local Nature Reserve (LNR) covers an area of almost 300 acres, offering parking, toilets, picnic area, play space, marked trails and a permissive horse route
- Cherry Orchard Jubilee Country Park, south of Hawkwell – a 100 acre country park with woodlands, a lake, bridleways, flower meadows and way marked walks
- The Rayleigh Windmill Museum and heritage resource centre
- Cinemas and community centres generally within settlements
- Three golf courses - Ballards Gore, Rochford Hundred and The Rayleigh Club
- Marinas include the Essex Marina on Wallasea Island and Sutton Wharf just south east of Rochford town centre

Whilst there is an abundance of recreation and open spaces facilities within the District, these are unevenly distributed (**Figure 4**). SP4 addresses the demand on open space and opportunities for new recreational provision in the District. Options are discussed regarding open space and outdoor sports and recreation, indoor sports and leisure centres, facilities for young people, and play space facilities. Open space is an important resource for local communities, with many areas providing a multi-functional use; for example walking and cycling, informal play and formal sports such as football and cricket. All options identified for open space and outdoor sports and recreation (Table 27) look to retain, and where necessary, update existing policies. This is predicted to have positive effects on a variety of SA topics including health and wellbeing, biodiversity, climate change, and population and communities. Any updates to policies should be ambitious, considering the level of need identified during the plan period and the pressure this will place on open spaces in the District. Policy updates should also bear in mind the current uneven distribution of open space facilities within the District and the extent of potential benefits to be delivered.

¹⁸ Rochford District Council (2015) Environmental Capacity Study [online] available at: <http://www.rochford.gov.uk/planning/policy/new-local-plan/new-local-plan-evidence-base> Accessed November 2016.

Table 28: Indoor sports and leisure centre options

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

Table 29: Facilities for younger people options

Option	Justification as presented in the Issues and Options document
A. Retain the existing policy	<i>Core Strategy</i> policy CLT8 identifies the requirement to provide age appropriate youth facilities where need is identified, in an accessible location. This covers all the aspects needed for such a policy.
B. Do not have a policy on youth facilities	Having no specific policy on youth facilities weakens our ability to provide additional facilities for young people in the District.

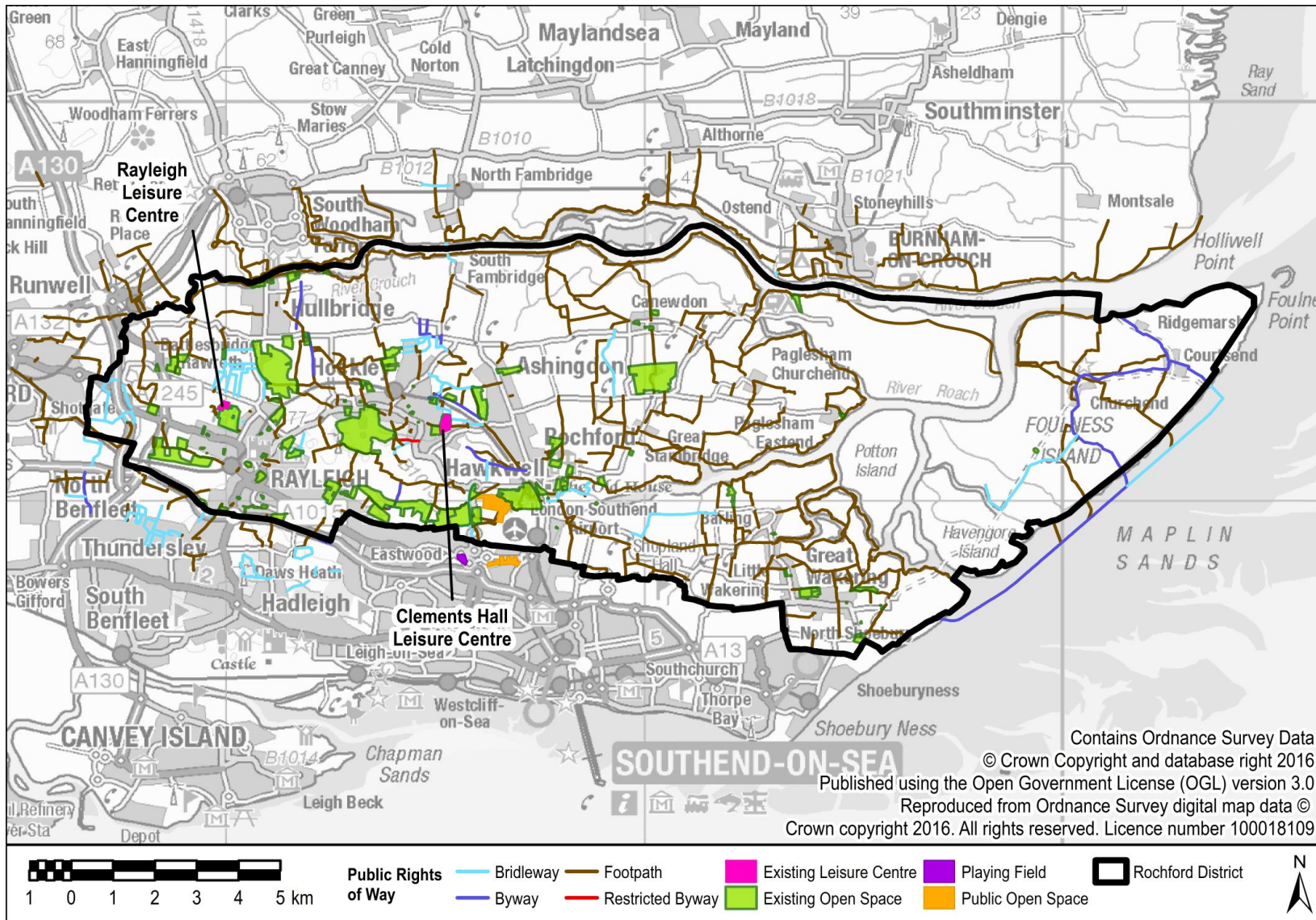
Table 30: Play space facilities options

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

A similar approach to that taken for open space is taken for indoor sports and leisure centres, facilities for young people, and play space facilities. (Tables 28-30). Whereas Option B is not reasonable, Option A seeks to retain existing policy, which performs positively for a variety of social and environmental SA topics. The delivery of existing fit-for-purpose policy should help to maintain and enhance the District's sport and leisure resources, having a positive effect on human health and wellbeing. This is expected to help maintain the 'very good' health,¹⁹ of almost half of the District (47.8%), which is above the comparative averages.

¹⁹ ONS (2011) Census 2011, General Health (QS302EW)

Figure 4: Open space & recreation



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

3.2.5.1 Green Belt

Table 31: Green belt options

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

The Green Belt within Rochford District forms part of the Metropolitan Green Belt, which extends eastwards across South Essex from London. Most of the District's open countryside - 12,763 hectares - is designated as Metropolitan Green Belt; the only exception to this is Foulness Island, which is Ministry of Defence land (see **Figure 5**). The government attaches great importance to Green Belts; the fundamental aim of the Green Belt policy being to prevent urban sprawl by keeping land permanently open.²⁰ This helps to protect the identity of settlements and communities within the District. **Figure 4** shows that the majority of the District's land is designated as Green Belt land. The NPPF states that '*Once established, Green Belt boundaries should only be altered in exceptional circumstances*' and, as such, detailed policy concerns are raised for all aspects of Green Belt development, including:

- Replacement, rebuild or extensions of existing Green Belt homes;
- Agricultural, forestry and other occupational homes in the Green Belt;
- Development of previously developed land in the Green Belt; and
- Extension of domestic gardens in the Green Belt.

The Green Belt is therefore a policy designation and does not directly relate to a particular SA topic.

The Green Belt is addressed within the Environmental Capacity Study (2015)²¹, which considers the ability of the District to accommodate additional new homes beyond 2025. The study recommends that site-specific studies could be undertaken for small sites around the northern and western urban areas, and that this could include an assessment of the Green Belt in these areas.

Table 31 shows the three options identified in relation to the Green Belt, of which Option B performs most positively against population. Option B would support amendments to the Green Belt policy to reflect the strategy for housing delivery for the next 20 years. This would ensure consistency with the Local Plan strategy, meeting identified requirements for sustainable development. However, Option B could also result in the loss of areas of open space and green infrastructure within the District. This has the potential for long-term negative effects on SA topics including landscape and historic environment, biodiversity, climate change, environmental quality, land and soil resources and health and wellbeing.

It is recognised that a balance would need to be struck between meeting social, economic and environmental needs in relation to the Green Belt. However, the constraints of the District are such that retaining the existing policy under Option A in its entirety may not allow the identified housing needs of the District to be met. Option B may result in development within the Green Belt; however,

²⁰ Department for Communities and Local Government (2012) National Planning Policy Framework

²¹ Enfusion (2015) Environmental Capacity Study prepared for Rochford District Council

the existing mitigation strategy within policy GB1 may reduce the significance of any negative effects. Option B will allow for a transparent approach in which the Council can make an informed decision, i.e. through an assessment of the Green Belt as a whole. A Green Belt assessment would form part of the evidence base for the Local Plan and will be used to identify the functionality of Green Belt parcels in relation to its five purposes (as set out in the NPPF).²²

3.2.5.2 Biodiversity and green infrastructure

Table 32: Biodiversity and geodiversity options

Option	Justification as presented in the Issues and Options document
A. Retain or amend our current broad policy on sites of nature conservation importance	<i>Core Strategy</i> policy ENV1 sets out our commitment to maintaining, restoring and enhancing our sites of nature conservation importance. It could however be strengthened to identify and seek to enhance local wildlife corridors and networks which support the adaptability of wildlife to any change in climate.
B. Do not have a policy on sites of nature conservation importance	The broad approach set out in <i>Core Strategy</i> policy ENV1 is considered to be appropriate in setting out our commitment to sites of nature conservation importance, and supports more detailed policies on protecting specific habitats.

Table 33: Local habitat options

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

The District contains a number of international and national nature conservation designations, including five European designated sites (the Crouch and Roach Estuaries SPA and Ramsar, Foulness SPA and Ramsar and Essex Estuaries SAC) and three SSSIs (Hockley Woods, Foulness and the Crouch and Roach Estuaries).

Locally designated biodiversity sites, including Local Nature Reserves (LNRs) and Local Wildlife Sites (LWSs) are spread across the District. There are notable concentrations of local designations in the southwest, west and central areas of the District, around Hockley, Rayleigh and west of Hawkwell. The largest LWS is the Wallasea Island Managed Realignment which covers 90.3 hectares (ha). **Figure 6** provides further detail.

Tables 32 and 33 list the options identified in relation to sites of nature conservation importance, and local habitats. The viable options are those which retain and/or update existing policies. Options C

²² Department for Communities and Local Government (2012) National Planning Policy Framework

and D suggest existing planning policies are fit for purpose, reflecting little change in landscape features, woodland and trees. This is seen to be a reasonable approach, considering the biodiversity and ecological baseline is unlikely to have significantly changed since the adoption of the Core Strategy in 2014.

However, updating existing policies would have further positive effects on biodiversity and health and wellbeing through ensuring that data and assessment findings are up to date and that the plan is aligned with these. Policy updates may also reflect the predicted effects on designated biodiversity sites as a result of the implementation of the new Local Plan. As the options proposed are not mutually exclusive, the delivery of a combination of options A, C, D, E and F is seen to be the most appropriate approach, ensuring the safeguarding of biodiversity assets across the District. The new Local Plan should seek opportunities for enhancement where possible and seek to maintain and improve ecological corridors both within District and to surrounding areas.

Table 34: Greenways options

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

Table 35: Wallasea Island and the RSPB's Wild Coast Project options

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

SP5 also supports the RSPB's development of Wallasea Island as an important nature conservation project and visitor destination for the future. The project is the largest coastal managed retreat project in Europe, which Options A and B (Table 31), seek to continue to support under existing policy. This will have positive effects on biodiversity, landscape, human health as well as the economy through developing leisure and tourism opportunities.

The green infrastructure (GI) network is also of great value across the District. River corridors and green open spaces make a significant contribution to this, with key GI being found in the Upper Roach Valley, including dedicated bridleways, Ancient Woodland and marked walking routes.²³ Table 32 shows the two options proposed for greenways, which are to retain existing policy (Option H) or to not have any policy (Option I). Option H performs better against the SA topics as it supports the management and provision of greenways. The new Local Plan should continue to protect and seek the provision of greenways along with encouraging their multifunctional use. GI provides benefits

²³ Environmental Capacity Study (2015)

across a range of SA topics including biodiversity, climate change, environmental quality, human health and population and communities.

3.2.5.3 Landscape character

Table 36: Landscape character options

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

Whilst there are no nationally designated landscapes within or in close proximity to the District, the District itself is valued for its local landscape character. The landscape of Rochford District is distinct and varied, comprising three broad landscape character areas (LCAs);

- Crouch and Roach Farmland - extends south from the River Crouch then skirts around Hockley, Rochford and Rayleigh, to the east of Rochford as far south as Great Wakering.
- Dengie and Foulness Coast - covers the far eastern extent of the District, meeting the eastern boundary of Great Wakering.
- South Essex Coastal Towns - encompasses Hockley, Rochford and Rayleigh and the area in between, and Great Wakering.

Protecting the character of the landscape is imperative for the District. The East of England Intrusion Map²⁴ demonstrates how the east of the District is largely formed of undisturbed and tranquil areas. The west contains the built-up parts of the District, which includes many areas disturbed by noise and visual intrusion, particularly to the south west around Rayleigh and boundaries with Castle Point and Southend Boroughs.

There are a range of nationally designated heritage assets within the District, including six Scheduled Ancient Monuments (SAMs), ten Conservation Areas, and many Listed Buildings. There are also more than 350 sites of archaeological interest recorded on the Heritage Conservation Register (HCR) in the District. SP5 refers to the Environmental Capacity Study 2015, which considers landscape character, historic environment and key recreational areas together to determine potential sensitivity. The areas comprising the Upper Roach Valley and Dengie and Foulness Coast are considered to have the highest sensitivity.

Given the presence of a significant number of designated heritage assets, important views and buildings of townscape merit, SP5 identifies a range of options for landscape character (Table 36). Four of the five options put forward (Options A-D) are deliverable, and should be considered in-

²⁴ CPRE (2007) East of England Intrusion Map [online] available at: <http://www.cpre.org.uk/resources/countryside/tranquil-places/item/1786>. Accessed Nov 2016.

combination since they are not mutually exclusive. Options A-D offer positive effects for the landscape/ townscape and the historic environment.

Options A and B seek to retain existing Core Strategy policies as they are deemed fit for purpose, and will be underpinned by a local level landscape character assessment. Option C considers a broad brush approach to landscape character, considering all LCAs in one policy. This may have positive effects through providing an overview of the District's landscape and its sensitivities, and may aid decision making by presenting information within one policy. However, Option C may also result in loss of detail provided in Options A and B, considering the complexities and variabilities between the District's three LCAs.

Option D seeks to address the conflict between the direction of policies in the adopted Development Management Plan, such as the support for development schemes within the South Essex Towns Landscape Character Area, which is rural in nature and valued by local residents. Option D recognises that additional evidence on local landscape character would have positive effects for a number of environmental and social SA topics, contributing towards ensuring development is promoted in appropriate locations. Consideration should be given to the extent of the impact new development may have on the landscape's character and quality; this includes from the loss of landscape features as well as visual impact. A combination of options would maximise sustainability performance for the new Local Plan.

Table 37: Heritage and culture options

Option	Justification as presented in the Issues and Options document
A. Retain the existing policies	<i>Core Strategy</i> policies CP1, CP2 and CP3 are considered to be appropriate and fit for purpose in seeking to maintain high quality design and preserving the local heritage and culture in the District. The supplementary policies in the <i>Development Management Plan</i> (policies DM7 DM8, DM9 and DM23) contribute to this purpose through appropriately managing schemes within sensitive areas. The policies within the <i>Area Action Plans</i> for Rayleigh and Rochford, in particular, due to their historic significance are also heavily focussed on protecting the character of these town centres. Locally listed buildings, which do not have statutory protection, are afforded some protection through the planning policies by <i>Core Strategy</i> policy CP3 and <i>Development Management Plan</i> policy DM7.
B. Do not have policy or additional guidance relating to culture and heritage	This is not seen as a feasible option. It is vital to protect the culture and heritage of the District, through maintaining good design practises and preserving historically important areas. The policies seek to maintain the character of the District which is steeped in history, which is important not only for the welfare of local people through preserving a quality environment but also the local economy through tourism opportunities.

Table 38: Good design and building efficiency options

Option	Justification as presented in the Issues and Options document
A. Retain the existing policies on design	The current design policies are considered to be broadly sufficient in being able to deal with design issues when assessing any schemes. However any changes in national policy or guidance, such as design codes, may need to be considered.
B. Ensure design policies make specific reference to <i>Secured by Design</i> , and the need to strike an appropriate balance between urban design and security	It is important to ensure that any scheme – whilst being appropriately sensitive to the local context – is also suitably secure over the lifetime of the development.
C. Retain current guidance within our <i>Supplementary Planning Documents</i> .	Our current guidance provides broad principles that schemes should follow to ensure that they are appropriately designed, which is considered to be fit for purpose. However this could be further expanded to provide more specific design guidance for each area.
D. Develop specific design principles for individual towns and villages building on the current guidance within our <i>Supplementary Planning Documents</i> .	This would ensure that any new schemes, potentially outside of those covered by the <i>Area Action Plans</i> and <i>Conversation Area Appraisals and Management Plans</i> , are suitably designed for each area, in consultation with local communities, which have already agreed a design code or framework for schemes.

With regard to the historic environment, Table 37 shows that SP5 has identified just two options; retain existing policies (Option A), and, do not have policy or additional guidance relating to culture and heritage (Option B). Option B is not a viable option considering national planning policy and the extent of heritage assets within the District (see **Figure 7**). It is vital to protect the culture and heritage of the District for its contribution to the local economy and the wider historic environment. Option A suggests existing policies would be fit for purpose and, as such, would provide the necessary maintenance of the Districts' heritage assets, including through ensuring appropriate design and layout.

Landscape character and heritage can also be impacted by development design. SP5 addresses the importance of good building design through four '*design principles*' options (Table 38), of which Options A and C look to retain existing policy and guidance. Options B and D provide specific requirements for design policies and principles, building on guidance within '*Secured by Design*' and other Supplementary Planning Documents (SPDs). Improving design practice would enhance sustainability, protecting the attractiveness of the District's landscape and historic environment. Good design can also extend benefits to other SA topics, including climate change, human health and biodiversity. Given the varied environment and local character of the District, Options B and D are predicted to have the greatest positive effects, tailoring design needs to individual areas. However, as retaining current guidance is also recommended, a combined approach should be explored to maximise safety, attractiveness and prosperity for development locations.

3.2.5.4 Air quality

Table 39: Air quality options

Option	Justification as presented in the Issues and Options document
A. Retain the existing policies on air quality	<i>Core Strategy</i> policy ENV5 is still considered to be fit for purpose and allows us to restrict schemes for new homes where it would increase exposure to poor air quality or exacerbate existing poor air quality situations. <i>Development Management Plan</i> policy DM29 is also still considered to be appropriate in requiring air quality assessments for specific schemes.
B. Continue to promote clean air initiatives, such as sustainable ways to travel and renewable energy projects	Such proposals, where implemented, may help to improve air quality in that location and reduce the risks associated with exposure to poor air quality. Making use of technological innovations can result in positive contributions to managing air quality.
C. Support, where appropriate, the actions put forward in the <i>Rayleigh Town Centre Air Quality Action Plan</i>	The <i>Rayleigh Town Centre Air Quality Action Plan</i> includes specific proposals to combat poor air quality within the designated Rayleigh High Street AQMA. Where these actions require planning permission, or other planning involvement, supporting the implementation of these actions, provided they are considered appropriate, may help to alleviate the poor air quality situation in this area.
D. Do not have a policy on air quality	Such an approach is not considered to be a realistic option as national policy requires us to consider the impact proposed development has on air quality, and the presence of AQMAs.

Traffic is the primary source of air pollution in the District. In 2015, Rochford District Council declared an Air Quality Management Area in Rayleigh due to exceedances of NO₂ from road traffic. The area extends from the A127 trunk road to and encompassing the Rayleigh Town Centre one way system. Air quality was raised as a concern during community consultation and, as such, SP5 highlights the opportunity for the new Local Plan to affect air quality in a positive way, including through influencing what development is proposed and where, and the encouragement it can give to sustainable transport provision. This is particularly important given the recent publication of Defra's UK Air Quality Plan for tackling nitrogen dioxide, which states that, "*It is for local authorities to develop innovative local plans that will achieve statutory NO₂ limit values within the shortest time possible*".²⁵

²⁵ Defra (2017) Draft UK Air Quality Plan for tackling nitrogen dioxide. Available [online]: <https://consult.defra.gov.uk/airquality/air-quality-plan-for-tackling-nitrogen-dioxide/>

Table 39 shows the four options that have been identified in relation to air quality, of which Options, A, B and C should be considered in-combination if the plan is to have significant positive effect. Retaining existing policies, promoting clean air initiatives, and supporting the actions put forward in the Rayleigh Town Centre Air Quality Action Plan are all positive measures which should be taken to mitigate any adverse impacts proposals may have on air quality in the District. Air quality is significant issue in the District and nationally, and as such the plan should be far reaching in its approach to tackling the problem. Consideration should be given for residents living within low air quality areas, and the potential harm which may be triggered as a result of development. Improving air quality could have positive effects for SA topics such as climate change, human health, population and communities and environmental quality.

Figure5: Green Belt

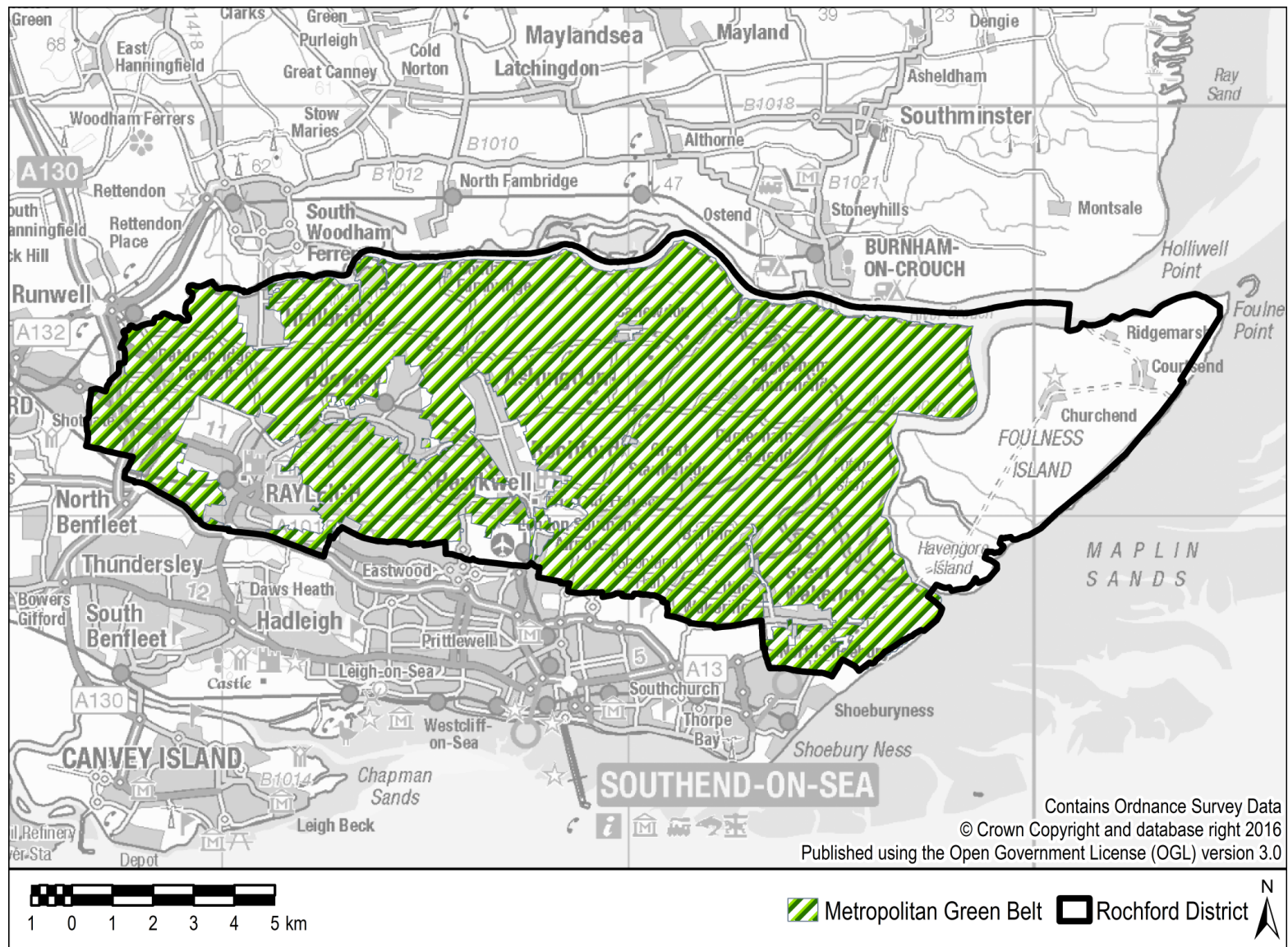


Figure 6: Biodiversity Designations

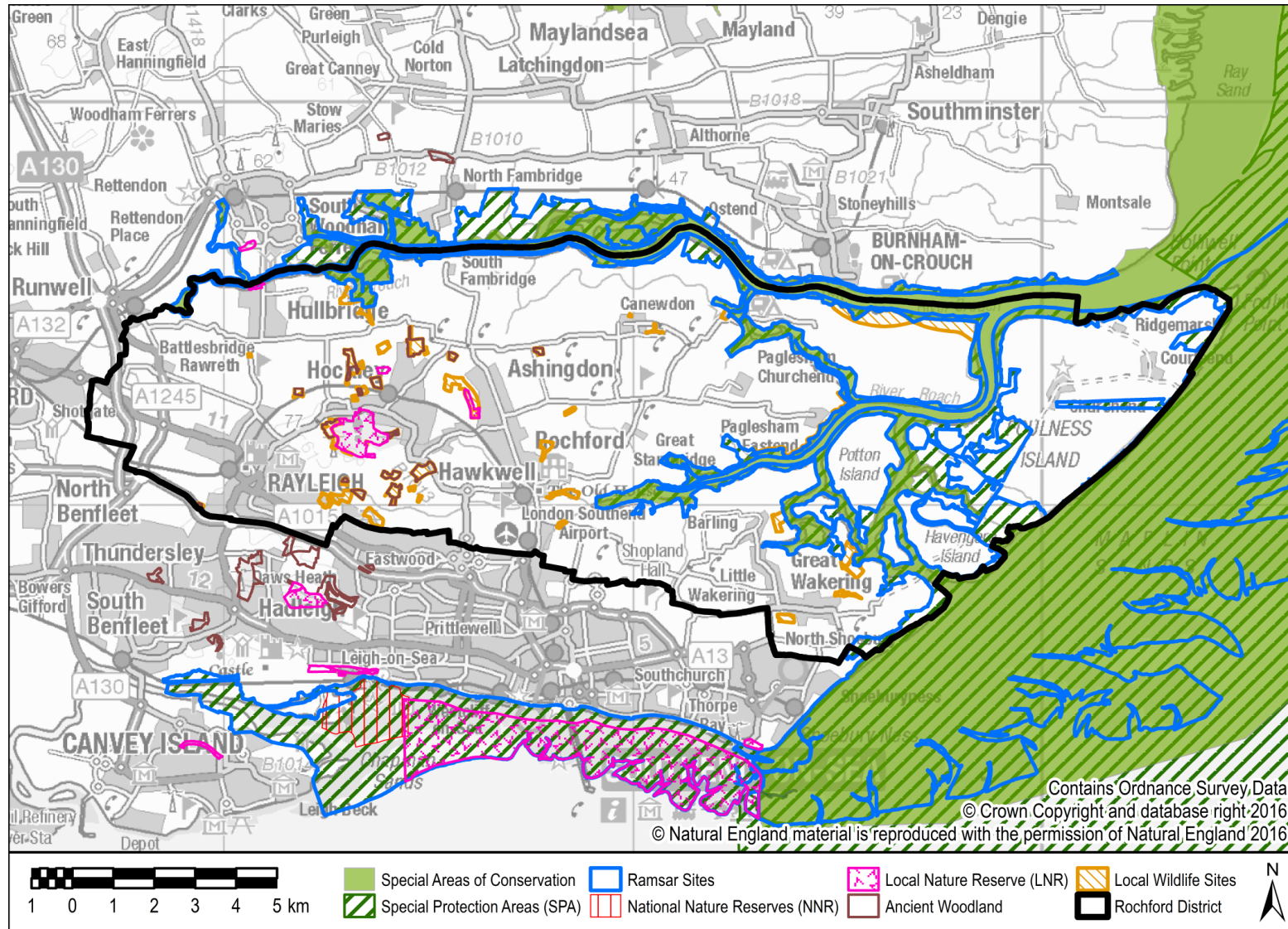
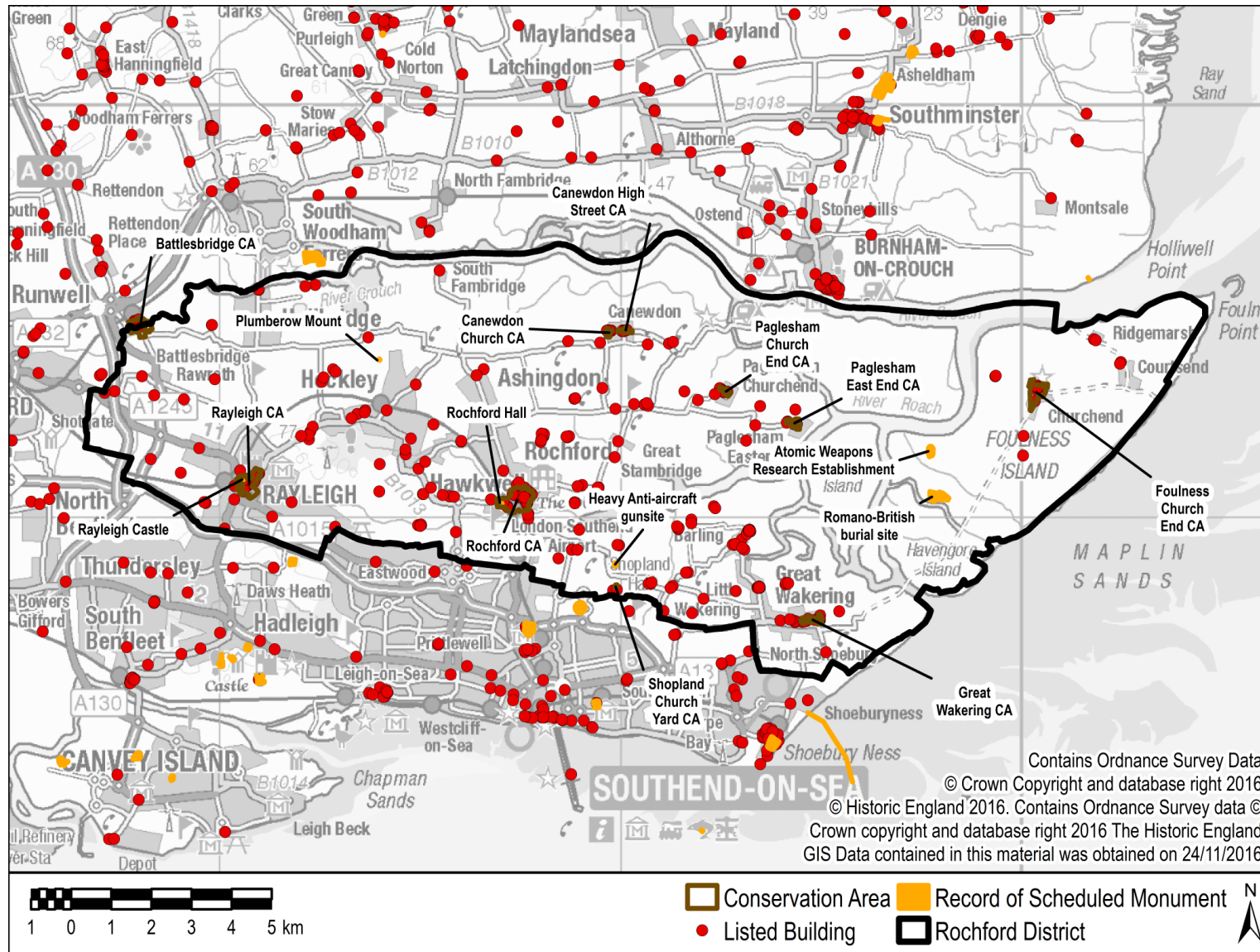


Figure 7: Historic environment



3.2.6 Detailed Policy Considerations

As part of the review of existing local plan policies and emerging evidence, the Council has identified potential issues and opportunities relating to non-strategic policies.

3.2.6.1 Housing

Table 40: Mix of affordable homes Options

Option	Justification as presented in the Issues and Options document
A. Retain the current affordable homes split (80% social and 20% intermediate) where a scheme meets the prescribed threshold	This current policy requirement has delivered 232 affordable homes over the last five years. It particularly provides for those households most in need on our Housing Waiting List.
B. Amend the split taking into account any changes in national planning policy and guidance (if the definition of affordable homes is widened to include other products)	There is some uncertainty about the direction of national policy and guidance in relation to the definition of affordable homes. This may reduce the number of homes available for those on our Housing Waiting List. However, the mix could favour affordable rent, for example 10% starter homes; 70% affordable rent; 15% shared ownership and 5% affordable private rented, depending on the outcome of the <i>Housing White Paper</i> and local viability testing.
C. Do not have a prescribed split in a policy	This would increase the flexibility of a policy; and would enable any schemes to meet affordable homes need at the time an application is submitted. However, it would provide less certainty for developers and could mean that there is no guarantee that enough social products are delivered to meet the needs of those on our Housing Waiting List.

Detailed policy consideration is given for a number of housing issues, with focus placed on meeting the needs of the Districts' residents over the next 20 years. Concerns are highlighted with regard to changes to the definition of affordable housing as suggested in the Housing White Paper (2016). The Council recognises that, as the body responsible for local housing matters, options must be put forward to ensure that the needs of residents continue to be met wherever possible. In this context Option B in Table 40 is the only feasible option for addressing the split between affordable housing products (the split between intermediate and social housing products).

Table 41: Rural exception sites options

Option	Justification as presented in the Issues and Options document
A. Introduce a specific policy on rural exception sites to promote the delivery of affordable homes only in rural areas (under 3,000 existing homes), subject to viability	Any schemes within a rural exception site will need to be led by a Registered Provider; the affordable homes would be affordable in perpetuity (however affordability is defined). There could be viability issues on some sites, which would impact on their ability to meet local needs. National policy recommends considering the inclusion of market homes to deliver more affordable.
B. Introduce a specific policy on rural exception sites to promote the delivery of affordable homes in rural areas (under 3,000 existing homes), with an element of market homes to improve overall viability	Any schemes within a rural exception site will need to be led by a Registered Provider, and solely enable the delivery of affordable homes with no element of profit including no additional uplift in land values. This would need to be made explicitly clear within any wider housing delivery policy. Supporting an element of market housing improves viability, and delivers a mix of homes in line with national policy. However it must be made clear that the subsidiary element of market homes is purely enabling development.
C. Include rural exception sites into a wider housing delivery policy (careful with blanket policy), accepting that a limited amount of market homes can be delivered to support a greater	Any schemes within a rural exception site will need to be led by a Registered Provider, and solely enable the delivery of affordable homes with no element of profit including no additional uplift in land values. 7) This would need to be made explicitly clear within any wider housing delivery policy. Supporting an element of market housing improves viability, and delivers a mix of homes in line with national policy.

Option	Justification as presented in the Issues and Options document
amount of affordable homes	However it must be made clear that the subsidiary element of market homes is purely enabling development.
D. The split between the different affordable homes products reflects the overall policy for affordable homes across the District.	This would ensure that there is consistency in the provision of a wide range of affordable homes products that meet the needs of the District's population.
E. A flexible approach to the split between the different affordable homes products so that it is timely and reflects the needs of rural settlements at a time when a scheme is being proposed.	This would ensure that the requirement for different affordable homes products meets the specific needs of a rural settlement when a scheme is being proposed.
F. Any policies on rural exception sites is prescriptive on their size and location to ensure that they reflect the size and function of the nearest rural community	Any schemes will need to reflect the size and function of the rural settlement so that they respect the rural character of an area. Taking a prescriptive approach on the size and location of any rural exception sites would provide certainty for local community.
G. Any policies on rural exception sites is flexible on their size and location to ensure that they reflect the size and function of the nearest rural community	Any schemes will need to reflect the size and function of the rural settlement so that they respect the rural character of an area. Taking a more flexible approach on the size and location of any rural exception sites would enable schemes to be determined on their individual merits as they are proposed. However this could potentially mean ad-hoc schemes being proposed in the Green Belt.
H. Do not have a rural exceptions site policy	The <i>NPPF</i> requires us to be responsive to local circumstances and plan to reflect local housing needs, particularly for affordable homes, including through rural exception sites where appropriate.

The Council recognises that rural exception sites are an important policy tool to deliver affordable homes within smaller settlements across the District and can help to maintain the sustainability of rural communities. As such, Table 41 shows the eight options that have been identified relating to the approach to delivering rural exception sites. Of these, Option A promotes the delivery of affordable homes only and while this may be the best option for meeting the affordable housing need in the area, there are viability issues. As such, Options B and C look to introduce/merge policies which include some market homes with affordable homes, as a more realistic approach for delivery. It is stressed that the subsidiary element of market homes within these options is purely enabling development. Options D and E approach the split between the different affordable homes products across the District. Option E performs most positively, addressing the needs of rural settlements at a time when a scheme is being proposed rather than having a consistent District wide approach which does not reflect the variability in the settlements' needs. Option G also takes into consideration the functionality of settlements, requiring development schemes to reflect and respect the rural character of an area. As such, a combination of Options B, C, E and G is recommended for delivering rural exception sites in the District.

Table 42: Self-build and custom build homes options

Option	Justification as presented in the Issues and Options document
A. Require a proportion of self-build and/or custom-build plots to be provided on private market allocated or windfall schemes over a certain size (alongside other types of homes needed) based on the level of local demand. For example, a minimum of one plot per 0.5 hectare to be set aside for these types of homes.	This approach would involve a portion of a private developer's site being reserved for self-builds or custom-builds. There may be implications for private developers in terms of viability, however this would provide greater certainty that a number of self-build or custom-build plots would be made available for purchase, and delivery. The actual threshold for provision of plots could be determined by the level of demand within different locations across the District.
B. Utilise the Council's assets, wherever	We do not currently own, manage or deliver homes, and there are

Option	Justification as presented in the Issues and Options document
possible, or acquire land to allocate plots for the purpose of self-build and/or custom-build, and help match people on the register to the plots.	limited assets and resources available to do this. There is also a financial risk involved which needs to be carefully considered.
C. Allocate individual plots in the Green Belt for self-build, where those on the Register have identified that they own the land, and this will be their sole or main residence.	Whilst this approach can provide plots for those with ready-access to land, it has the potential to lead to sporadic development in the countryside, contrary to the five purposes of the Green Belt. Such an approach could create further pressure which could have an erosive impact on the Green Belt.
D. Do not have a policy on self-build or custom-build plots.	This approach is not considered to be appropriate, as the Government requires us to facilitate the delivery of self-build or custom-build plots.

Table 43: Annexes, outbuildings and independent homes options

Option	Justification as presented in the Issues and Options document
A. Develop a policy which sets out clear criteria for annexes and outbuildings (or similar)	We could take a positive approach to the treatment of annexes and outbuildings (or similar) where it can be clearly demonstrated that the dwelling would be dependent on the main home. Such dwellings could be conditioned to require their occupation to remain ancillary to the main home. It would also be useful to include guidance on such development in the Green Belt.
B. Do not have a policy on this – continue to rely on case law	Case law has provided clearer guidance on how applications for separate annexes or outbuildings (or similar) should be treated in relation to the threshold for a 'dependence' test on the main home.

Table 44: Basements Options

Option	Justification as presented in the Issues and Options document
A. Extend the current policy on basements in the Green Belt	This would limit basements in the residential area to the same extent as those in the Green Belt; including in size and its use as a dependent part of the above ground building. Within the residential area, this policy could also take into consideration the impact on the historic environment (such as Conservation Areas, Listed Buildings and locally listed properties).
B. Do not have a policy on basements in the existing residential area	There has not been a significant increase in the number of applications for basements. The justification for such a policy would need to be clearly evidenced. It is still considered to be appropriate to have a policy on basements in the Green Belt however.

Tables 42-44 show that options for self-build and custom built homes, annexes, outbuildings and independent homes, and basements are largely either proposing to retain or update existing policies. Updating policies is the preferred option as this would take into account any recent changes in baseline data, key issues, and government policy changes. For annexes, outbuildings and independent homes for example (Table 43), Option A looks to develop criteria for policy to determining decisions with respect to annexes and outbuildings, as this has previously been a grey area. Considering the recent rise in the number of annexes and outbuildings within the curtilage of existing homes being built within the District, Option A is predicted to have an enhanced positive effect on SA topics relating to population and communities and the economy.

3.2.6.2 Development within the Green Belt

Table 45: Replacement, rebuild or extension of existing Green Belt homes options

Option	Justification as presented in the Issues and Options document
A. Retain the current policies on replacement, rebuild or extension of existing Green Belt homes	On the whole, our policies in the <i>Development Management Plan</i> (DM17 and DM21) are considered to be consistent with the <i>NPPF</i> . However there have been a low number of applications, due to the nature of current permitted development rights.
B. Amend the extension allowance within <i>Development Management Plan</i> policies DM17 and DM21	Permitted development rights enable generous extensions, contrary to the <i>NPPF</i> , which has encouraged numerous disproportionate, piecemeal, flat roofed extensions. Our current policies could be more flexible to encourage applications for well designed, low pitched roof extensions in line with current permitted development rights. This would take a more 'scenario-based' approach to these types of applications.
C. Do not have a policy on extensions and rebuilds	There is a need to provide guidance on what is acceptable in the Green Belt, regardless of the permitted development rights. This approach is not considered to be appropriate.

Table 46: Agricultural, forestry and other occupational homes options

Option	Justification as presented in the Issues and Options document
A. Retain the current policies	<i>Development Management Plan</i> policies DM18 and DM19 are considered to appropriate and fit-for-purpose; and in line with the <i>NPPF</i> .
B. Do not have policies on agricultural, forestry and other occupational homes	There is a need to provide some more specific guidance on how applications for these types of accommodation would be treated, given the extent of the Green Belt in the District. This approach is not considered to be appropriate.

Table 47: Development of previously developed land in the Green Belt options

Option	Justification
A. Retain the current policy on previously developed land	<i>Development Management Plan</i> policy DM10 is considered to be appropriate in supplementing the provisions of the <i>NPPF</i> .
B. Do not have a policy on previously developed land	Our current policy provides more localised guidance on how applications for the development of previously developed land in the Green Belt in accordance with national planning policy.

Table 48: Extension of domestic gardens in the Green Belt options

Option	Justification as presented in the Issues and Options document
A. Retain the current policy on extension of domestic gardens	Our current policy (<i>Development Management Plan</i> policy DM22) – particularly in relation to ensuring that extensions are not disproportionate – is working well. However in practice there are concerns about the removal of permitted development rights, and the ability of home owners to enjoy their gardens.
B. Allow permitted development rights within extended garden areas	Permitted development rights would enable those who have, lawfully, extended their garden into the Green Belt to erect certain structures. This could have an impact on the openness of the Green Belt but it would enable home owners to enjoy their gardens.
C. Do not have a policy on the extension of domestic gardens	<i>Development Management Plan</i> policy DM22 provides detailed guidance on how applications for such extensions into the Green Belt would be treated. Having a local policy on this is considered to be an appropriate response.

Based on the proposed options under each of these categories, there is a general approach taken which looks to retain existing policies in relation to the Green Belt. Considering the Green Belt constraints, this is seen to be a positive approach as existing policies are consistent with the NPPF, highlighting opportunity for development of land where appropriate. For example, the NPPF (paragraph 89) allows for the redevelopment of brownfield (previously developed) sites whether redundant or in continuing use (excluding temporary buildings), if the scheme would not have a greater impact on the openness of the Green Belt, and the purpose of including land within it, than the existing development. This is reproduced within Policy DM10, and as such remains fit-for purpose, contributing positively to meeting the needs of the District.

For replacement, rebuild or extensions of existing Green Belt homes (Table 45), three options are proposed; of which Option B proposes flexibility in current policy, which is in line with current permitted development rights. Option B would best contribute to the sustainable delivery of homes, encouraging provision which is well-designed, that would likely be in-keeping with the character of the landscape and townscape. Option C is not seen to be viable by the Council and is therefore not a reasonable alternative.

3.2.6.3 Local Businesses

Table 49: Homes businesses options

Option	Justification as presented in the Issues and Options document
A. Retain the current policy	Our current approach in <i>Development Management Plan</i> policy DM33 is considered to be appropriate in striking a balance between enabling businesses to start-up and prosper at home, provided they would not have an unreasonable negative impact on the residential nature of the local area or neighbours.
B. Take a more restrictive approach to home businesses	We want to continue to support and nurture home businesses in the District. We have the highest survival rate of new businesses in South Essex as identified in the <i>EDNA</i> , and want to continue to improve this trend through supporting start-up businesses. Taking a more restrictive approach to home businesses, which could discourage entrepreneurs in the District and have a negative impact on our local economy, is not considered to be an appropriate approach.
C. Take a more flexible approach to home businesses	Taking a more flexible approach to home businesses could have a greater negative impact on neighbouring properties through impacting on residential amenity and the local road network for example. As home businesses grow – which we support – there are more suitable locations for such businesses to locate to within the District. It is important that the right balance is struck between supporting and nurturing home businesses and considering the impact on neighbours. The need for grow-on space in the District is considered in more detail in the ‘Delivering Homes and Jobs’ chapter.
D. Do not have a policy on home businesses	This is not considered to be an appropriate response to the need to encourage homes business whilst protecting the amenity of neighbouring properties.

Table 50: Alterations to existing business premises options

Option	Justification as presented in the Issues and Options document
A. Retain the current policy on existing businesses in the Green Belt	Our current approach in <i>Development Management Plan</i> policy DM11 is broadly considered to be appropriate. However, the undefined reference to scale could be misinterpreted.
B. Include further guidance on the size of extension that would be considered proportionate	This approach would limit the guidance being misinterpreted to potentially allow larger than intended proposals coming forward through the planning application process.
C. Do not have a specific policy on alterations to existing business premises	The majority of the District is designated as Green Belt land. It is not considered to be an appropriate approach to not have a specific policy on alterations to existing business premises in the Green Belt.

Rochford District Growth Strategy (2014) sets out a number of actions that are intended to assist local businesses to grow and develop, to promote new business start-ups, to nurture and inspire entrepreneurial talent, and to encourage existing businesses to relocate to Rochford. The Council is therefore keen to support 'home businesses' where possible; however, the Issues and Options Document recognises that the right balance needs to be struck between supporting and nurturing 'home businesses' and considering their potential impact on neighbours. In this context, Table 49 shows that Option A (retaining existing policy) is likely to be most appropriate as it maintains a balance between economic growth and community health and wellbeing. The Council supports the vitality of the local economy through permitting alterations to existing business premises, encouraging the utilisation of existing units as much as possible. Options A and B within Table 50, identified for alterations to existing business premises in the Green Belt, are not mutually exclusive and should be considered in-combination when developing the plan. This would contribute towards reducing misinterpretation of guidance and have positive effects on the population and communities SA topic.

3.2.6.4 Environmental quality

Table 51: Light pollution options

Option	Justification as presented in the Issues and Options document
A. Retain our existing policy on light pollution	<i>Development Management Plan</i> policy DM5 is fit for purpose, following guidance from professional bodies. It is considered to take into account appropriate factors in determining the suitability of lighting schemes.
B. Update policy, considering favouring the use of new technologies	Our current policy could be amended to specifically require installation of the best technology (where appropriate) which seeks to reduce the light spillage, glare and sky glow over traditional lighting.
C. Do not have a policy on light pollution	Such an approach is not considered to be a realistic option as national policy requires us to consider the design and potential impact of lighting schemes at the planning application stage.

Light pollution is highlighted within the detailed policy considerations as a significant issue for the District. Habitats and species have the potential to come under increasing pressure from light induced disturbance, and there may also be changes in tranquillity in and around the District, affected by the levels of light pollution. Existing policy seeks to minimise the impact of light pollution wherever possible, which would be strengthened and enhanced under Option B, considering new technologies where appropriate. Option B (Table 51) therefore performs best, having positive effects on a number of SA topics including biodiversity, landscape, population and human health.

Table 52: Contaminated land options

Option	Justification as presented in the Issues and Options document
A. Retain the current policy on contaminated land	<i>Core Strategy</i> policy ENV11 is considered to be fit for purpose in supporting the development of suitable brownfield (previously developed) sites wherever possible, whilst ensuring that appropriate investigation, remediation and mitigation measures are implemented.
B. Do not have a policy on contaminated land	National planning guidance requires that we address the issue of contaminated land through the plan-making process. Failing to have a policy on this is not considered to be an appropriate approach.

There is no evidence to suggest that contaminated land is a significant issue within the District; however, there is support for identifying and remediating contaminated sites over greenfield land wherever possible. Of the two options considered in Table 52, the Council identifies Option A as the preferred approach, proposing to retain the existing policy on contaminated land. Current policy supports the development of suitable brownfield (previously developed) sites wherever possible, whilst ensuring that appropriate investigation, remediation and mitigation measures are implemented. Promoting the

development of brownfield land would be a positive use of the Districts' natural resources, and may contribute towards relieving pressure on existing constraints. This would likely to have a significant long-term positive effect on land, soil and water resources through the efficient use of land.

3.3 Developing the Preferred Approach

At this stage there has been no decision made in terms of a preferred approach. The Council is currently seeking views from key stakeholders and the public on the key issues and broad options set out in the Issues and Options Document. The majority of proposed options are not mutually exclusive and it is likely that a combination of them will be required to meet the needs of the District during the life of the Plan.

The background is a solid blue gradient with several thin white lines crisscrossing across it. One line runs from the top-left towards the bottom-right. Another runs from the top-right towards the bottom-left. A third line runs from the middle-left towards the top-right. A fourth line runs from the middle-right towards the bottom-left. These lines intersect to form various geometric shapes and patterns.

Part 3: What Happens Next?

4. Introduction (to Part 3)

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

4.1 Next Steps

This Interim SA Report will accompany the Issues and Options Document for public consultation in late 2017. Any comments received will be reviewed and then taken into account as part of the iterative plan-making and SA process. Following the consultation, there will be further consideration of more clearly defined spatial strategy options as well as policies for the delivery and management of growth.

The representations received along with further evidence base work, including further SA work, will inform the development of a first draft of the Local Plan (Preferred Options), which is scheduled to be published for consultation in 2018. An updated Interim SA Report will accompany the first draft Local Plan for consultation.

