

**Rochford New Local Plan:
Spatial Options Consultation 2021**

Topic Paper 11: Strategy Options

Temporary Cover

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Advisory Note

The National Planning Policy Framework (NPPF) was subject to a formal revision in July 2021, just before these papers were published. As a consequence, paragraph numbers and other references to the 2019 NPPF made in this document may no longer relate exactly to the latest version of the NPPF.

The principles set out in referenced paragraphs have not been subject to extensive change and references made are therefore still considered to be accurate reflections of national policy.

Introduction

1. This topic paper has been prepared in order to summarise the rationale for the identification of spatial strategy options for the Rochford new Local Plan.
2. Paragraph 20 of the National Planning Policy Framework (NPPF) 2019 is clear that it is the role of (Local) Plans to set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:
 - a) housing (including affordable housing), employment, retail, leisure and other commercial development;
 - b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
 - c) community facilities (such as health, education and cultural infrastructure); and
 - d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation
3. The NPPF requires strategic policies to provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area.
4. National policy recognises that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:
 - a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;
 - b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;
 - c) set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided;
 - d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations);
 - e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.

5. The NPPF also sets out a number of specific requirements around the components of strategies. These include:
 - i. A requirement for 10% of homes delivered through a strategy to be on sites no larger than 1 hectare
 - ii. Requirements to consider the merits of rural housing, including through exceptions sites, where they would respond to a particular need or help support rural services.
6. Sustainability Appraisal is an iterative process that must be carried out during the preparation of local plans and spatial development strategies. The Planning Practice Guidance (PPG) identifies its role as to promote sustainable development by assessing the extent to which the emerging plan, **when judged against reasonable alternatives**, will help to achieve relevant environmental, economic and social objectives. This process is an opportunity to consider ways by which the plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. **By doing so, it can help make sure that the proposals in the plan are appropriate given the reasonable alternatives**. It can be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met.
7. All of these requirements read together create an imperative to consider the relative merits of different strategies when preparing a Local plan to ensure that the strategy eventually selected is appropriate in light of the District's vision and priorities, and delivers sustainable development.
8. This topic paper has been prepared to accompany the Council's Spatial Options consultation paper, setting out the rationale for the strategy options that have been identified within that Paper.
9. It is not the purpose of this topic paper nor the Spatial Options Consultation paper to justify the selection of one particular strategy. The process for the selection of a strategy for the new Local Plan is an iterative process which will need to take account of the Sustainability Appraisal, technical evidence base documents and representations made to the consultation.

Summary of Identification Process

10. The identification of strategy options is ultimately a judgement based on identifying reasonable options relating to the distribution of development in the District and differentiating between these options in a way that is meaningful with respect to distribution or quantum. The identification process took account of four main components:
 - i. Development Needs
 - ii. Land Availability
 - iii. National Policy Requirements
 - iv. Clusters of sites
 - v. Infrastructure thresholds

11. At this stage of plan-making, the Council is not seeking to identify an infinite number of precise options and compare these exhaustive. It is instead seeking to be effective and proportionate, by identifying a number of broad strategy options with meaningful differences and comparing these proportionately. As a result, there is not an imperative for each strategy option to be accompanied by a precise understanding of capacity or site boundaries at this stage.

Development Needs

12. The District has identified development needs that the new Local Plan will need to address.

13. The Government has made it clear that it wants to significantly increase the supply of new housing across the country. It has set a target of 300,000 homes to be built each year by the mid-2020s. National policy is clear that plans should meet local housing needs, unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits. When determining how many homes need to be built in Rochford, national policy is clear that the standard method set out in Government guidance should be used as a starting point, unless exceptional circumstances justify otherwise. The current standard method suggests that we would need to build around 360 homes per year over the next 20 years to meet our housing needs, which equates to 7,200 homes.

14. National policy also requires Local Plans to provide strategies that accommodate unmet need from neighbouring areas where it is practical to do so and is consistent with achieving sustainable development. Whilst the scale of unmet housing need from others' plans, including those from elsewhere in South Essex and London, is not fully known, it is possible that building more than 360 homes per year, if sustainable to do so, could help to accommodate some of this need.

15. The Council is part of the South Essex Economic Development Needs Assessment (EDNA) and South Essex Retail Study (SERS), both prepared in 2017. These assessments presented a range of scenarios relating to the future need for employment and retail space, respectively, over the next 20 years. It is recognised that since these assessments were prepared, the local and regional economies have been affected by the COVID-19 pandemic which is likely to have disrupted and accelerated different economic trends. Whilst updates to these assessments are

planned, they are considered to remain useful for provided broad bookends for the likely need for economic uses through the new plan based on long-term trends.

16. The EDNA identified a potential need for up to 7 hectares of employment land by 2036, which rises to 16 hectares when making an allowance for churn and windfall. Compared against the District's potential supply of new employment land, including the delivery of allocated sites at Michelin Farm, Airport Business Park and Star Lane, it is possible that no additional land will need to be allocated to meet Rochford's future employment needs, and it may be that consolidation of employment land for housing can be justified in some locations. However, to ensure our growth strategy makes sustainable and well-rounded communities, there may remain a need to allocate land for specific or niche employment uses not being met by the existing market, such as grow-on space or flexible workhubs, which are considered in more detail in the Employment Topic Paper.
17. The South Essex Retail Study 2017 identifies a need for around 13,000m² of new retail floorspace by 2037, if Rochford was to build 360 homes a year over that period. This is made up of around 11,500m² of comparison floorspace and 1,500m² of convenience floorspace. Whilst the Retail Study does not consider the retail floorspace needs of planning for an even higher housing figure, extending this figure proportionately results in a possible need for around 20,000m² of new retail floorspace if housing growth was around 590 homes a year.
18. A range of growth scenarios have been identified at this stage of plan-making, summarised in Table 1. The level of growth that should be taken forward in plan-making will be a matter for future stages of plan-making as more evidence is available. At this stage, the options identified in this topic paper are based on the realistic options for accommodating Rochford's own growth needs, with flexibility to consider whether (a) Rochford's growth needs would be better met elsewhere, e.g. areas of non-Green Belt or lower value Green Belt; or (b) unmet needs can be met in Rochford.

Scenario	Explanation
<p>Current Trajectory</p>	<p>Approximately 4,500 new homes by 2040 can be delivered by maximising urban and brownfield capacity and windfalls. It may be possible for the remainder of Rochford’s growth needs to be met elsewhere. However, it is a minimum expectation of national policy that local authorities plan to meet their identified needs which means this option may be unlikely to result in a sound plan if those needs cannot be met elsewhere.</p> <p>This scenario may also require around 7 hectares of employment land (based on EDNA combined scenario) and no new retail floorspace other than windfalls</p>
<p>Standard Methodology</p>	<p>7,200 new homes by 2040 would meet the Council’s housing needs based on the current standard method</p> <p>This scenario may also require around 16 hectares of employment land (based on EDNA combined scenario with allowance for churn and windfall) and around 13,000 m² of new retail floorspace (based on South Essex Retail Study)</p>
<p>Standard Methodology + 50% Buffer</p>	<p>10,800 new homes by 2040 would meet the Council’s housing needs based on the current standard method, with an additional 50% buffer which could help to drive local economic growth or address unmet need from elsewhere</p> <p>This scenario may also require around 40 hectares of employment land (based on maintaining existing employment allocations) and around 20,000 m² of</p>

	new retail floorspace (based on Retail Study adjusted for housing growth)
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Table 1 – Emerging Growth Scenarios for the Rochford new Local Plan

Land Availability

19. An important component of identifying deliverable strategy options is the availability of land to accommodate the growth and uses needed to meet development needs. A strategy predicated on the development of land not being promoted for development is unlikely to be deliverable and may not be considered reasonable or sound when examined.
20. The assessment of land availability was informed by evidence including the Housing and Economic Land Availability Assessment and planning permissions data. The Council has previously run Call for Sites processes in 2015 and 2017.

National Policy Requirements

21. The Council’s HELAA and Urban Capacity Study identify that urban and other non-Green Belt land is unlikely to be sufficient to meet local development needs in full. As a result, if development needs are to be met in full, it is likely that some development within the Green Belt will be required.
22. Paragraph 137 of the NPPF requires that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account Paragraph 136, and whether the strategy:
 - a) makes as much use as possible of suitable brownfield sites and underutilised land;
 - b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport;
 - c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.
23. Whilst it is recognised that exceptional circumstances may include meeting identified development needs, it is not possible to conclusively determine at this stage whether exceptional circumstances exist to justify changes to Green Belt boundaries. It is therefore considered important that the Council does not presume the existence of exceptional circumstances and tests the exceptionality of circumstances through the plan-making process. In practice, this means considering the soundness and sustainability of a strategy based on making best use of non-Green Belt (urban- and brownfield) land.

24. It is also recognised that the NPPF in various sections encourages the location of development in the most sustainable locations, taking into account environmental, economic and social factors. In practice, this includes directing development towards locations with the best access to transport networks, facilities and services, giving weight to the ability for a strategy to minimise use of the private car and loss of productive greenfield land. In practice, the locations with greatest potential to support access to networks, facilities and services are likely to be those adjacent to or within larger settlements or in areas where growth can deliver new transport connections, facilities and services. However within this context, Paragraph 78 of the NPPF also requires that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby. It is therefore considered important that the strategy options give weight to the potential for locating development in less sustainable locations where these locations would be of particular value to rural or village communities.
25. Whilst absolute policy constraints, including internationally protected habitats sites and areas of greatest risk of flooding, do exist in Rochford District, the extent of these constraints do not coincide with promoted land to such a degree that it affects strategy option identification. It is, however, recognised that such constraints and others will have a bearing on eventual site selection.

Clustering of Sites

26. In 2020, the Council commissioned Lichfields to undertake clustering analysis to inform the preparation of the new Local Plan. The purpose of this clustering exercise to enable the Council to test the implications and merits of different spatial strategies (e.g. growth in different groupings of clusters) and consider the site-specific options that exist within any given cluster.
27. It is not the role of the clustering exercise to generate a wide range of similar scenarios for testing, however the clustering analysis is considered useful to consider how sites being promoted to the new Local Plan 'fit' in the context of existing settlements and the context of other promoted sites. By doing so, it can allow meaningful geographic delineations to be drawn amongst sites being promoted to the new Local Plan.
28. An iterative process was followed to identify the clusters:

1 Physical and proximity characteristics. The degree to which a site or area is within, adjacent or contiguous with a settlement or neighbourhood.

2 Settlement study findings. The Councils have separately produced a settlement study which looks at the settlement hierarchy and services available within different geographies, which has been drawn upon to inform the definition of settlements and neighbourhoods.

3 Infrastructure servicing. This considered the degree to which clusters of sites are

served by the same strategic infrastructure and would have the same impact on strategic infrastructure networks (e.g. sites that all feed off the same strategic highway infrastructure, or have proximity to the same relevant train stations); and

4 Perception of geography. This sought to sense check clusters against perceptions of geography including whether there are historic or cultural reasons why a site should fall within one cluster over another. This has been particularly important for sites or areas where boundaries are blurred or neighbourhoods run into each other.

29. Figure 1 sets out the outcomes of this clustering exercise.

Infrastructure Thresholds

30. The last consideration in the strategy option identification process was the application of a meaningful infrastructure threshold to distinguish between options which are likely to generate site infrastructure and options which are likely to generate community infrastructure.

31. It is recognised that Paragraph 72 of the NPPF encourages strategic plan-making authorities to consider how the supply of new housing can best be achieved by planning for larger development, such as new settlements or significant extensions to existing villages or towns. Whilst this paragraph does not define 'larger development' or 'significant', it is considered reasonable to apply a threshold around the level of demand needed for a new primary school.

32. The Essex County Council Developers' Guide to Infrastructure Contributions identifies that around 1,400 new homes are needed to support a new two-form entry primary school, or a mixed use development of approaching 2,000 dwellings.

33. As the prevailing housing mix of new developments in the District is housing-led, with a modest proportion of other types of accommodation or use, it is considered reasonable to use a meaningful infrastructure threshold slightly higher than that recommended for a housing-only scheme. The threshold used is therefore 1,500 dwellings.

34. It is recognised that using a different threshold could lead to slightly different results. Nevertheless the relative merits of a strategy including sites smaller than 1,500 dwellings will be considered in any strategy and site selection process, and the precise infrastructure requirements of strategies and sites will be considered as the plan progresses. It will be possible to expand or alter the threshold approach at a later stage should the consultation highlight any opportunities not identified through this approach, or should it be determined that a site smaller than 1,500 dwellings possesses comparable advantages.

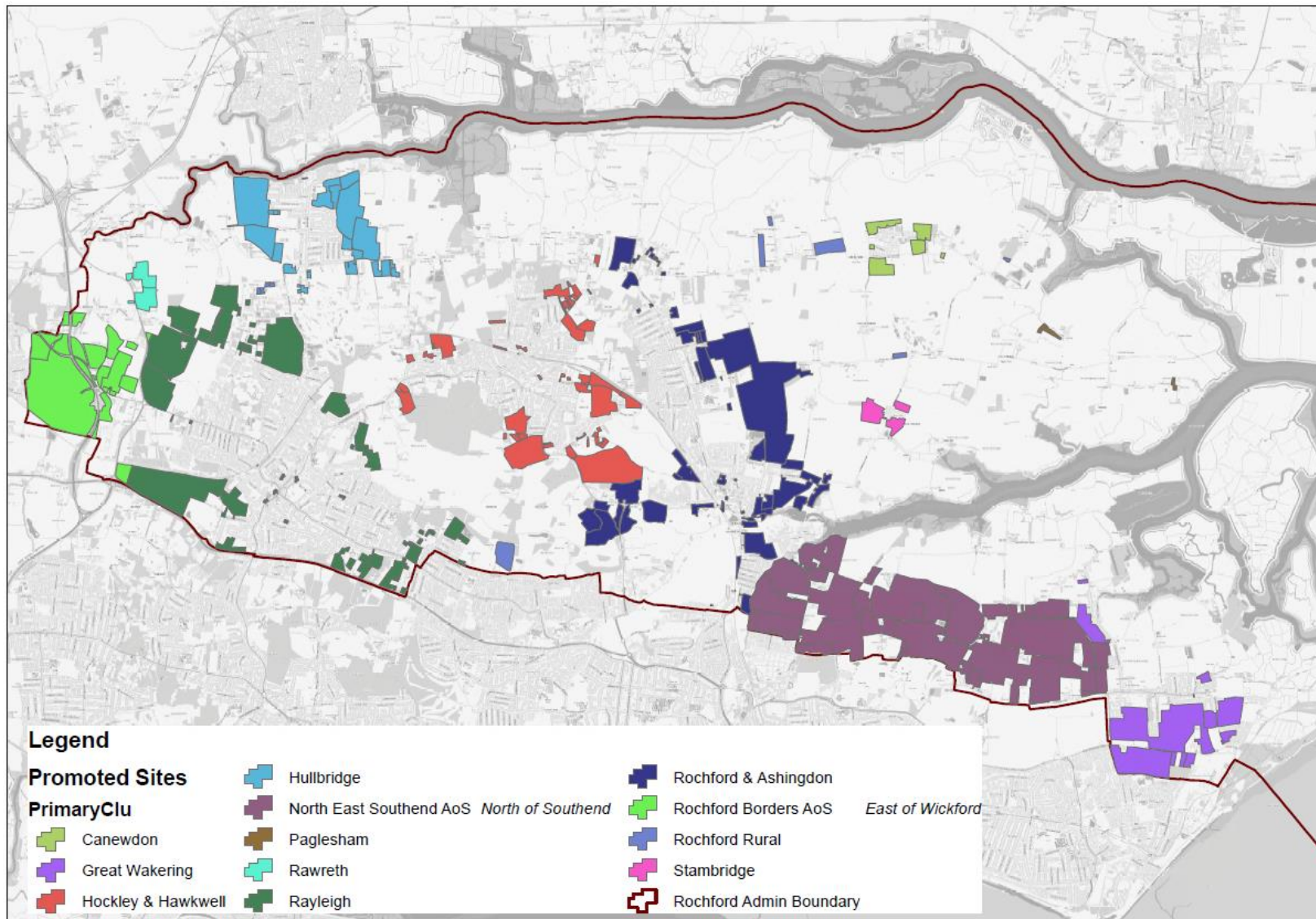
35. In considering how sites and clusters of sites relate to this infrastructure threshold, a judgement has been used as to how one or more sites may come forward together as a strategy to achieve growth in excess of the threshold. This judgement has considered the extent to which the sites in an area or cluster are being promoted by a single or small number of promoters and the extent to which the sites in an area or

cluster are adjacent or near-adjacent. It is recognised that some clusters may contain sufficient sites to deliver in excess of 1,500 dwellings, however where these are in a plethora of ownership and promoters, and/or lack adjacency or near-adjacency, these are not considered to hold the characteristics expected by Paragraph 72.

Summary of Identified Strategy Options

36. Table 1 highlights the identified strategy options with a rationale for their identification.

Figure 1: Clustering Results, Lichfields (2020)



Option	Rationale
1: Urban Intensification	National policy requires plans to make best use of brownfield and other under-utilised land. Whilst it is recognised that development needs are unlikely to be accompanied without development of some Green Belt land, it is not clear at this time whether exceptional circumstances exist to justify amendments to the existing Green Belt boundaries. This option would therefore make best use of non-Green Belt land, including urban, brownfield and other under-utilised land.
2a: Urban Extensions to Main Towns	National policy encourages growth to be directed to the locations with greatest capacity to support development, including those with the best transport connectivity and greatest access to facilities and services. This option would direct development to the District’s three main towns which offer the greatest connectivity to the road and sustainable transport network, offer the greatest number and diversity of jobs, facilities and services, and which offer the greatest access to community infrastructure including open spaces, schools and healthcare facilities.
2b: Urban Extensions to all settlements based on Hierarchy	In addition to the above, national policy also requires that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. This option would spread some development away from the main towns to smaller villages which may not be as objectively sustainable, but nevertheless have local housing and infrastructure needs that can be supported by proportionate growth. The use of the settlement hierarchy would help to ensure that the level of growth planned in each settlement is proportionate to the role and function of that settlement.
3a: Concentrated growth west of Rayleigh	National policy identifies that there may be advantages to accommodating development needs by planning for larger developments such as new settlements or significant extensions to villages or towns. This area is one of three areas where sufficient adjacent or near-adjacent land is being promoted to accommodate more than 1,500 dwellings (or that needed to secure a new primary school).
3b: concentrated growth north of Southend	National policy identifies that there may be advantages to accommodating development needs by planning for larger developments such as new settlements or significant extensions to villages or towns. This area is one of three areas where sufficient adjacent or near-adjacent land is being promoted to accommodate more than 1,500 dwellings (or that needed to secure a new primary school).
3c: Concentrated growth east of Rochford	National policy identifies that there may be advantages to accommodating development needs by planning for larger developments such as new settlements or significant extensions to villages or towns. This area is one of three areas where sufficient adjacent or near-adjacent land is being promoted to accommodate more than 1,500 dwellings (or that needed to secure a new primary school).
4: Balanced combination	It is recognised that the options set out above are not mutually exclusive and an option exists to include aspects of different options.

