

Core Strategy Topic Paper 1 – PPS25 sequential test

Introduction

- 1.1 This document has been prepared in response to a representation submitted by the Environment Agency in respect to Rochford District Council's Core Strategy Submission Document, requesting that further information be provided for one element of Policy H1 relating to the issue of flood risk.
- 1.2 PPS25 indicates that the overall aim of decision-makers should be to steer new development to Flood Zone 1 by applying a sequential test. Where there are no reasonably available sites in Flood Zone 1, decision-makers should take into account the flood risk vulnerability of land uses and consider reasonably available sites in Flood Zone 2, applying the Exception Test, if required. Only where there are no reasonably available sites in Flood Zones 1 or 2 should decision-makers consider the suitability of sites in Flood Zone 3, again taking into account the flood risk vulnerability of land uses and applying the Exception Test, if required.
- 1.3 It is not the purpose of PPS25 to prevent all development on sites liable to flooding; it is accepted that development may often have to take place in a flood risk area. Due to the obvious risks of developing on land liable to flooding, the intention is to minimise the risks to people and property
- 1.4 The vast majority of all development proposed in the Core Strategy can be accommodated within Flood Zone 1.
- 1.5 However, Policy H1 of the Core Strategy Submission Document states that Stambridge Mills be redeveloped for housing. The Stambridge Mills site is located within Flood Zone 3a. As such, it is necessary to apply the PPS25 sequential test to ascertain whether there are any alternative, appropriate locations for development which are at a lower risk of flooding.

Background evidence and policy documents

- 2.1 The background evidence and policy documents used in the production of this sequential test are as follows:
 - Annual Monitoring Report 2008-2009
 - East of England Plan (2008)
 - Planning Policy Statement 1 – Delivering Sustainable Development
 - Planning Policy Guidance Note 2 – Green Belts
 - Planning Policy Statement 3 – Housing
 - Planning Policy Statement 25 – Development and Flood Risk
 - Planning Policy Statement 25: Development and Flood Risk - Practice Guide (2009)
 - Rochford District Employment Land Study (2008)

- Rochford District Strategic Housing Land Availability Assessment (2009)
- Rochford District Core Strategy Submission Document (2009)
- Rochford District Replacement Local Plan (June 2006)
- Rochford District Strategic Environmental Assessment Baseline Information Profile 2008-2009
- Sustainability Appraisal of Rochford District Core Strategy (2009)
- Thames Gateway South Essex Strategic Flood Risk Assessment (2006)

Requirement for development

- 3.1 The East of England Plan requires 3,790 dwellings to be developed between 2006 and 2021. Between 2006 and 2009 there were 720 net additional dwellings complete, leaving a balance of 3070 to be provided.
- 3.2 PPS3 requires that Local Planning Authorities makes provision for fifteen years supply of housing land. Where this entails going beyond the time horizons of the Regional Spatial Strategy, Local Planning Authorities should continue at the same annual rate beyond the plan period. In Rochford District's case, this results in the need to accommodate an additional 1000 dwellings between 2021 and 2025.
- 3.3 In addition to residential development, and the infrastructure that will be required to accompany it, the East of England Plan also requires Rochford District to ensure the delivery of 3,000 additional jobs between 2001 and 2021. The Rochford District Employment Land Study (2008) concludes that Rochford should, in addition to providing compensatory employment land for any de-allocation of employment sites, allocate an additional 2 hectares of employment land.
- 3.4 There is a clear requirement for residential and employment development in the District.
- 3.5 The Strategic Housing Land Availability Assessment (SHLAA) 2009 considers the supply of land for housing that is deliverable. The SHLAA, excluding Stambridge Mills and Green Belt sites, identifies a housing supply of 1023. The SHLAA concludes that the District has the potential to accommodate the housing allocated to it in the East of England Plan, but that this will require the release of Green Belt land.
- 3.6 The SHLAA states that Stambridge Mills is a non-Green Belt site which has a deliverable capacity of circa 250 dwellings.
- 3.7 As such, the non-Green Belt housing land supply for the District is 1023 dwellings excluding the deliverable capacity for Stambridge Mills, and 1273 dwellings including the site.
- 3.8 In addition to housing, there is also a requirement for land for employment uses. Stambridge Mills is currently allocated for

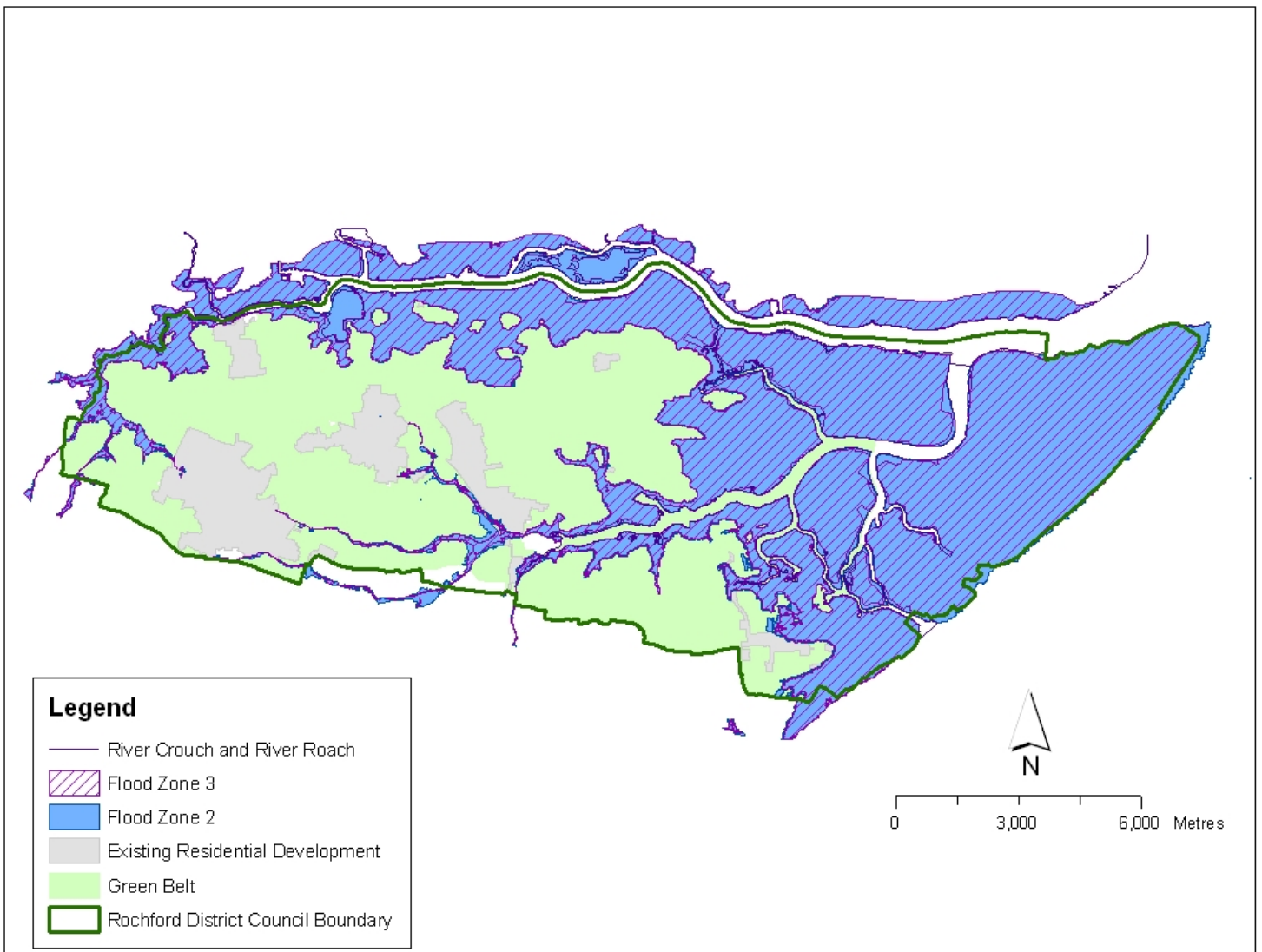
employment. However, the employment use of Stambridge Mills ceased some time ago and, having regard to submissions in respect of the SHLAA in particular, there is little evidence to suggest that employment use of the site is deliverable or viable.

Accommodation of development within Flood Zone 1

4.1 Flood Zone 1 comprises land least at risk of flooding. It is the purpose of the PPS25 sequential test to direct development to such areas where it would be appropriate to the type of development or land use proposed.

4.2 The majority of the District is Flood Zone 1. Map 1 shows the extent of Flood Zone 2 and 3 within Rochford District.

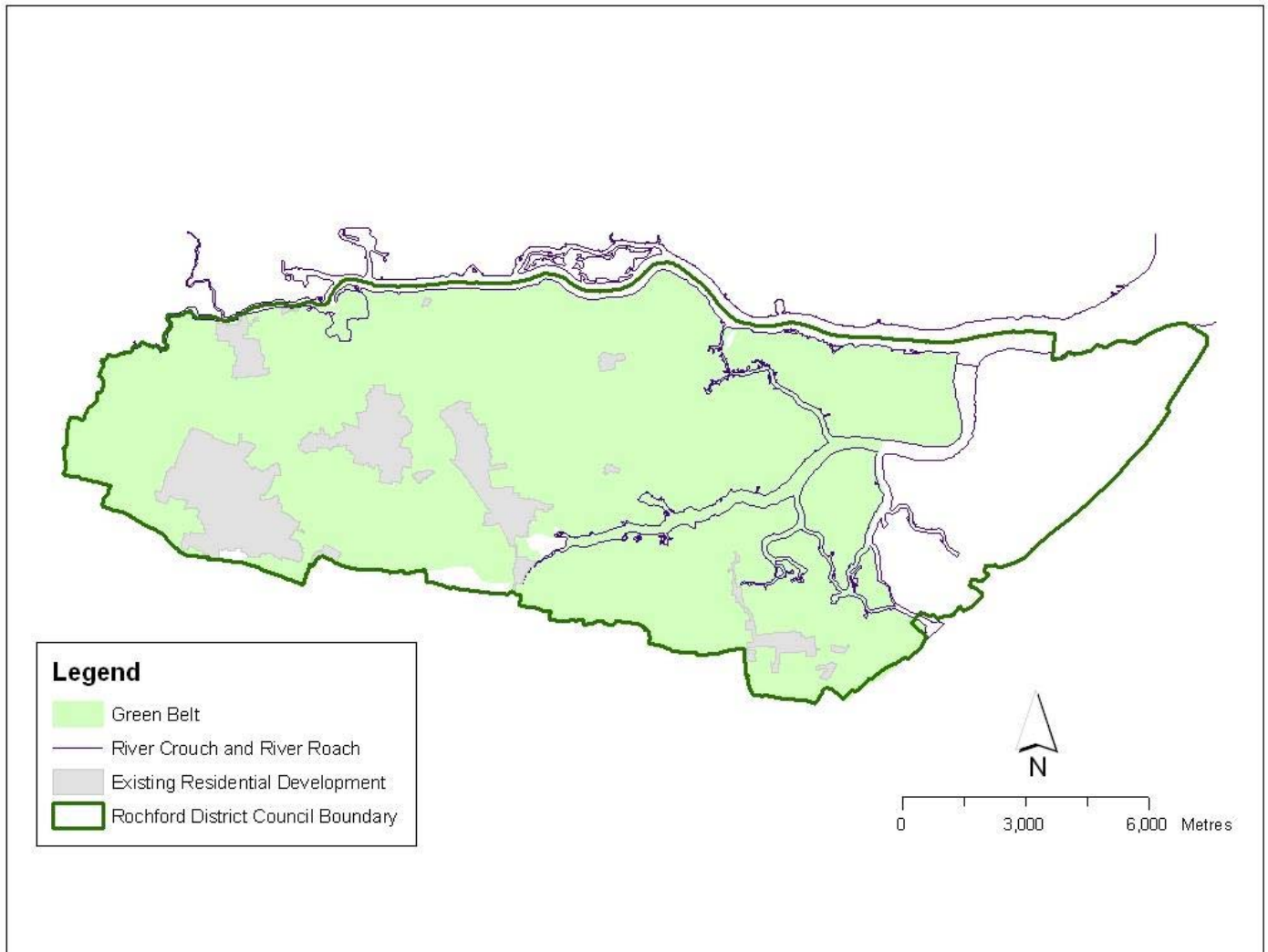
Map 1 – Flood Zones 2 and 3



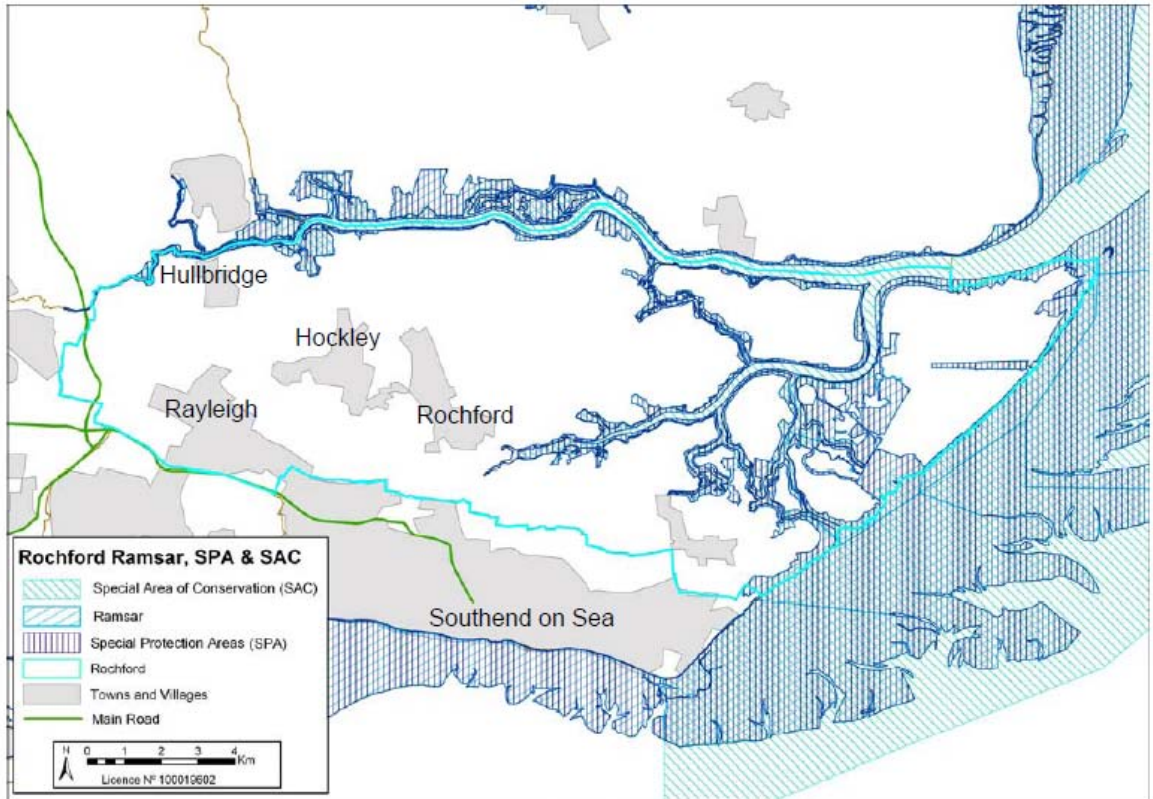
4.3 However, the majority of the District is also subject to a number of constraints that restrict development, including:

- Green Belt (Map 2)
- Ramsars, Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) (Map 3)
- Sites of Special Scientific Interest (SSSI) (Map 4)
- Ancient Woodlands and Special Verges (Map 5)
- Local Nature Reserves (Map 6)
- Local Wildlife Sites (Map 7)

Map 2 – Green Belt

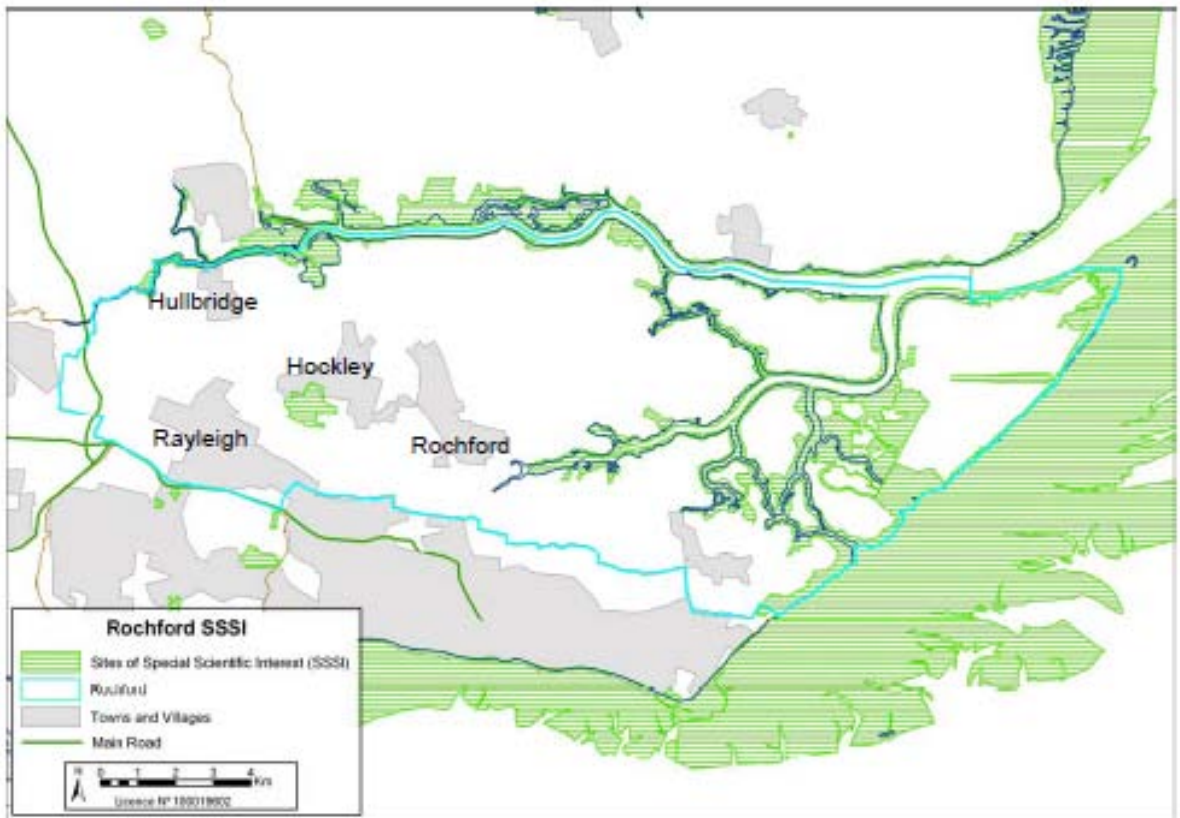


Map 3 – Ramsars, Special Protection Areas (SPAs) and Special Areas of Conservation (SACs)



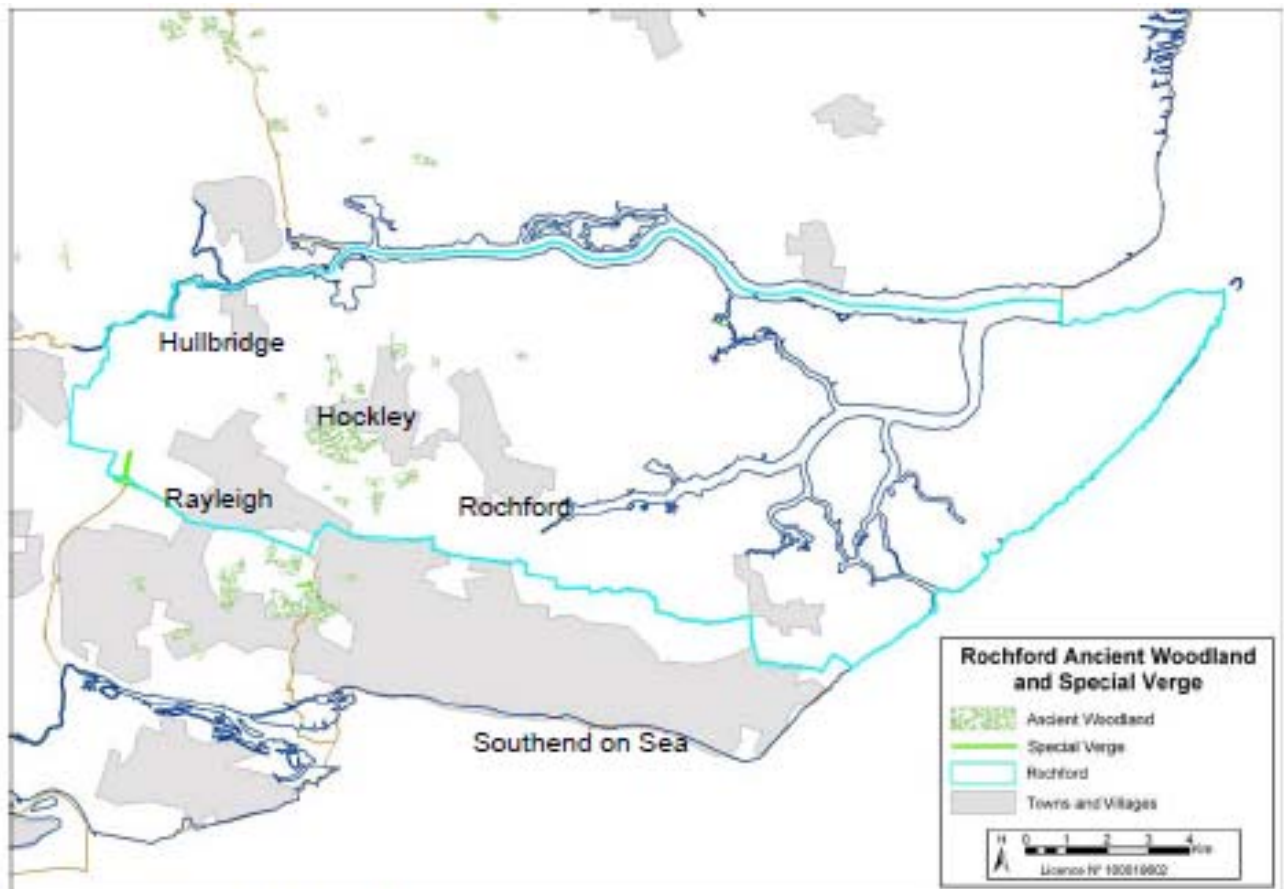
Source: Essex County Council 2008

Map 4 – Sites of Special Scientific Interest



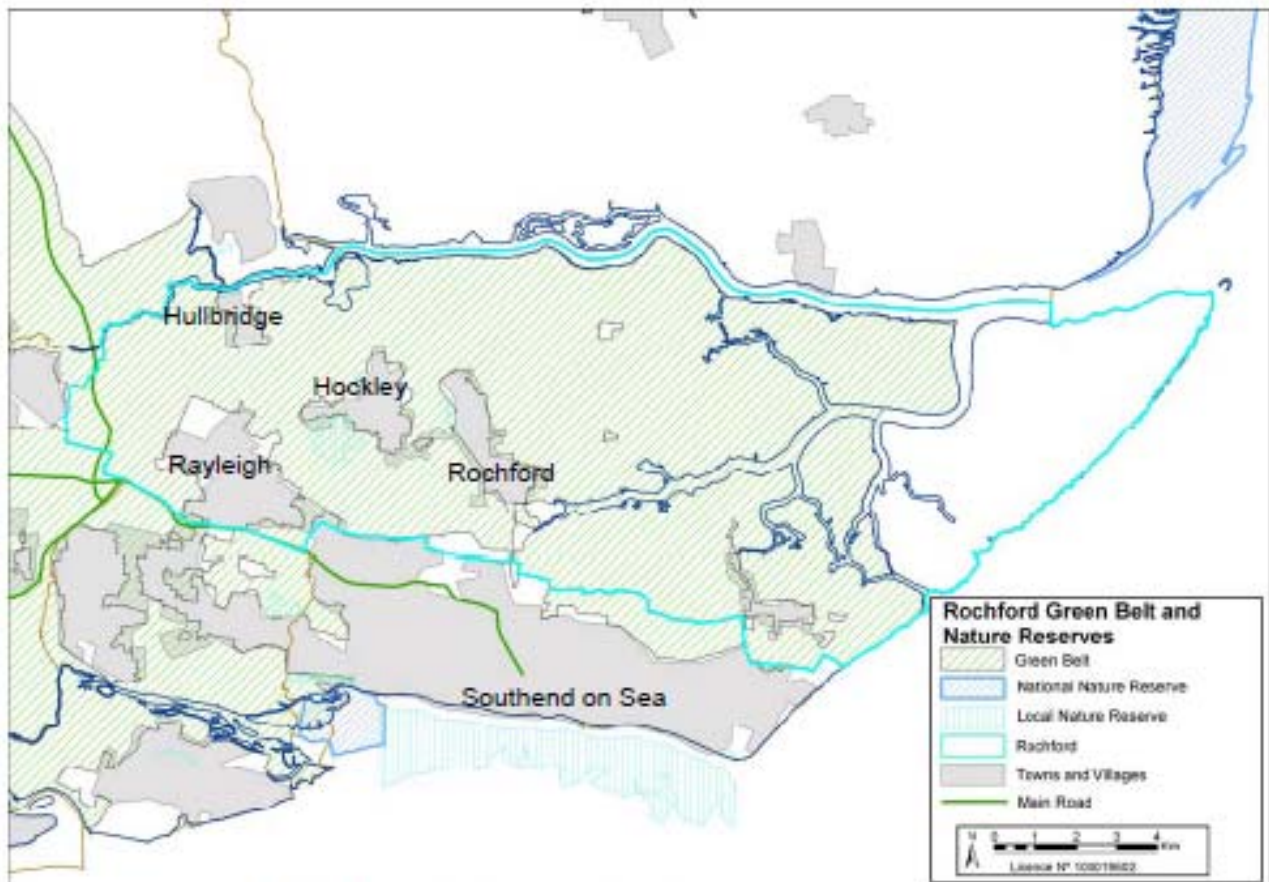
Source: Essex County Council 2008

Map 5 – Ancient Woodland and Special Verges



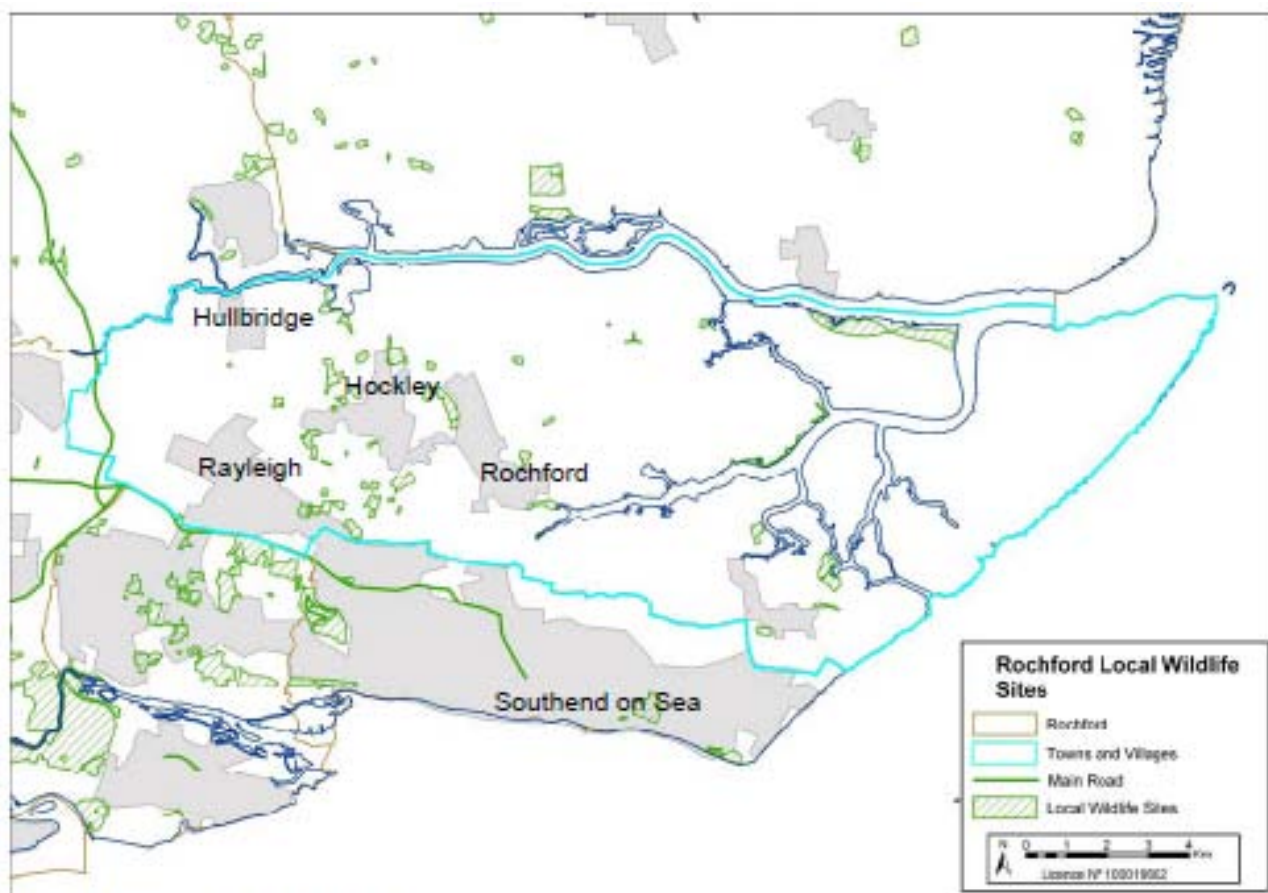
Source: Essex County Council 2007

Map 6 – Local Nature Reserves



Source: Essex County Council 2008

Map 7 – Local Wildlife Sites

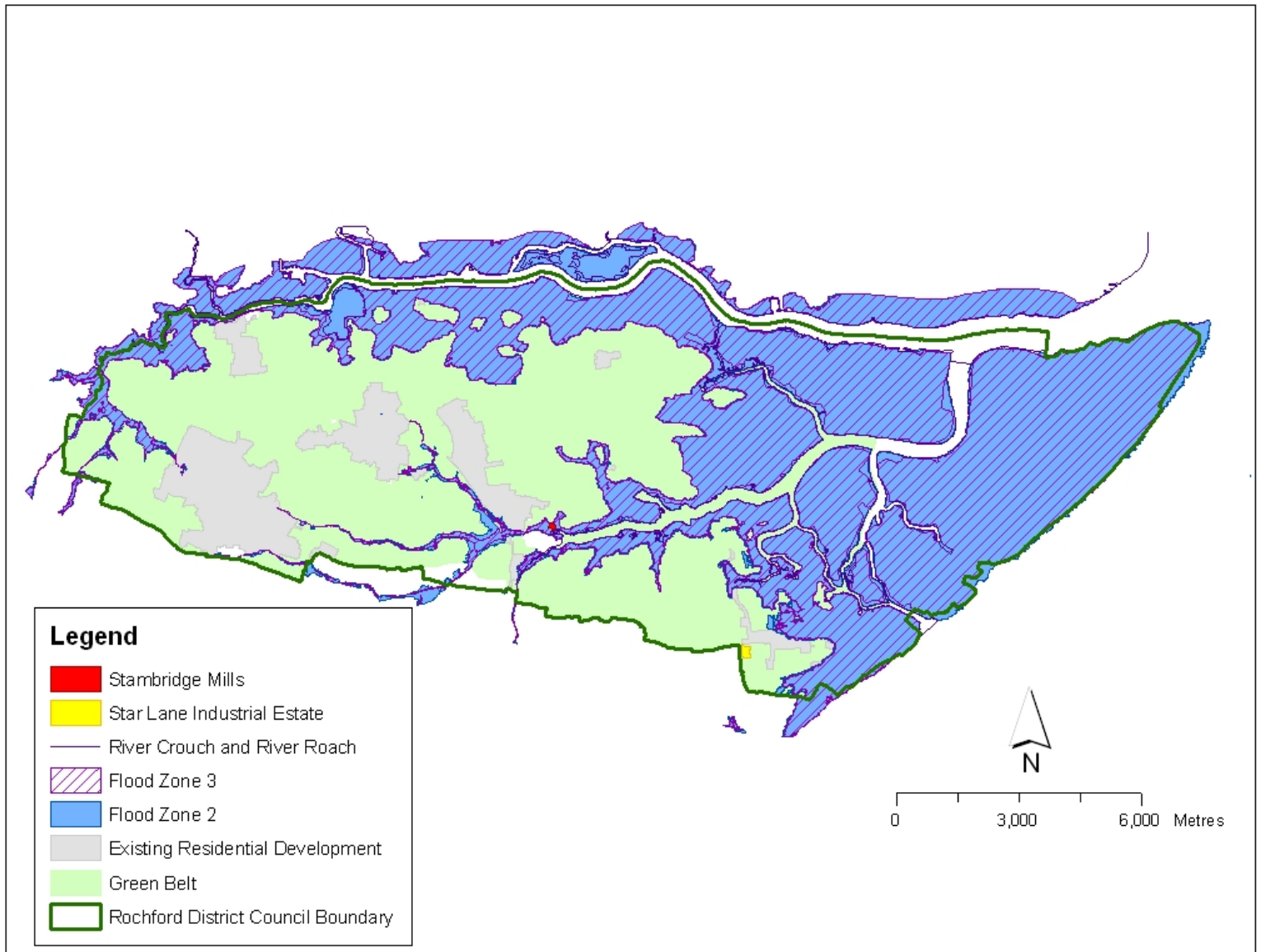


Source: Essex County Council 2008

- 4.4 Paragraph 16 of PPS25 states that, in applying the sequential test, LPAs allocating land in LDDs for development should apply the Sequential Test (see Annex D and Table D.1) to demonstrate that there are no reasonably available sites in areas with a lower probability of flooding that would be appropriate to the type of development or land use proposed.
- 4.5 As such, it is necessary to consider whether the types of land listed in Table 1 should be considered appropriate for residential development when applying the PPS25 sequential test.
- 4.6 Appendix A provides an assessment of these land types and concludes that none should be considered appropriate for residential development ahead of alternative land types.
- 4.7 Consequently, it is necessary to consider whether the required quantum of residential development can be accommodated on land in the District not subject to constraints listed in Table 1. There are two vacant previously developed sites on land outside of the Green Belt in the District: Stambridge Mills and Star Lane Brickworks. These sites,

shown on Map 8, have both been assessed as part of the SHLAA and found to be deliverable for residential development. Given the extent of land in the District that is subject to constraints, the remaining land supply is somewhat limited and comprises: existing residential allocations; town centres; and existing employment allocations. Appendix B provides an assessment of whether such land is reasonably available and appropriate for residential development.

Map 8 – Vacant, previously developed land outside of Green Belt



- 4.8 Appendix B demonstrates that there are no reasonably available alternative sites that have not already been accounted for within the SHLAA, where residential development is demonstrably deliverable.

Conclusions

- 5.1 The supply of land which is outside of the Green Belt and not subject to other constraints is limited.
- 5.2 There are no reasonably available alternative sites to Stambridge Mills in areas less at risk of flooding that have not already been accounted for within the SHLAA, with the exception of land in the Green Belt. The SHLAA notes that there are adequate areas of Green Belt which have the potential to deliver housing that are in lower areas of flood risk than Stambridge Mills. However, having regard to PPG2, such land cannot be considered appropriate for development when applying the sequential test ahead of an allocated site outside of the Green Belt.
- 5.3 Stambridge Mills is considered to pass the PPS25 sequential test for residential development.