

Core Strategy Topic Paper 1

PPS25 Sequential Test

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)

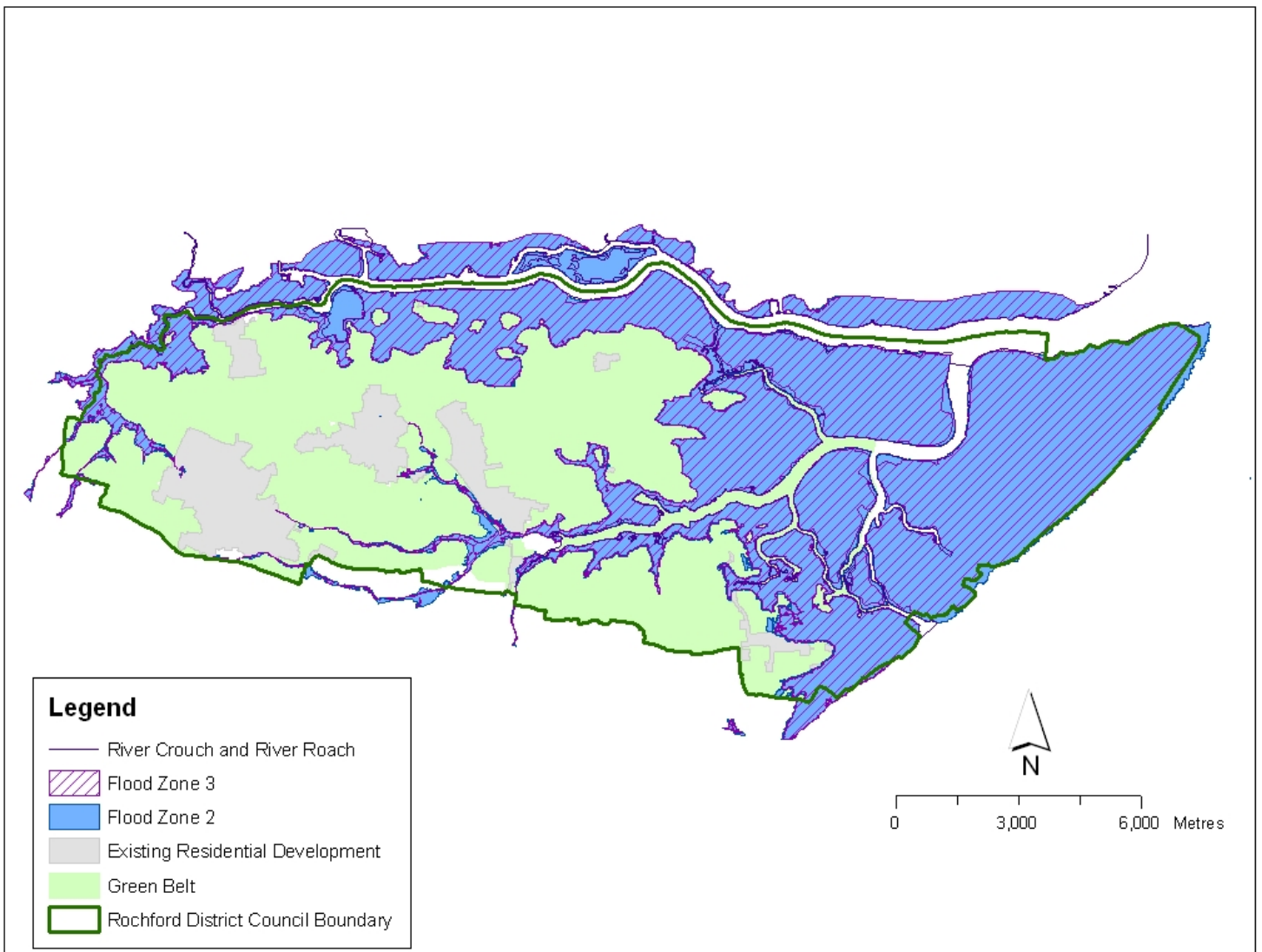
Requirement for development

- 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

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.

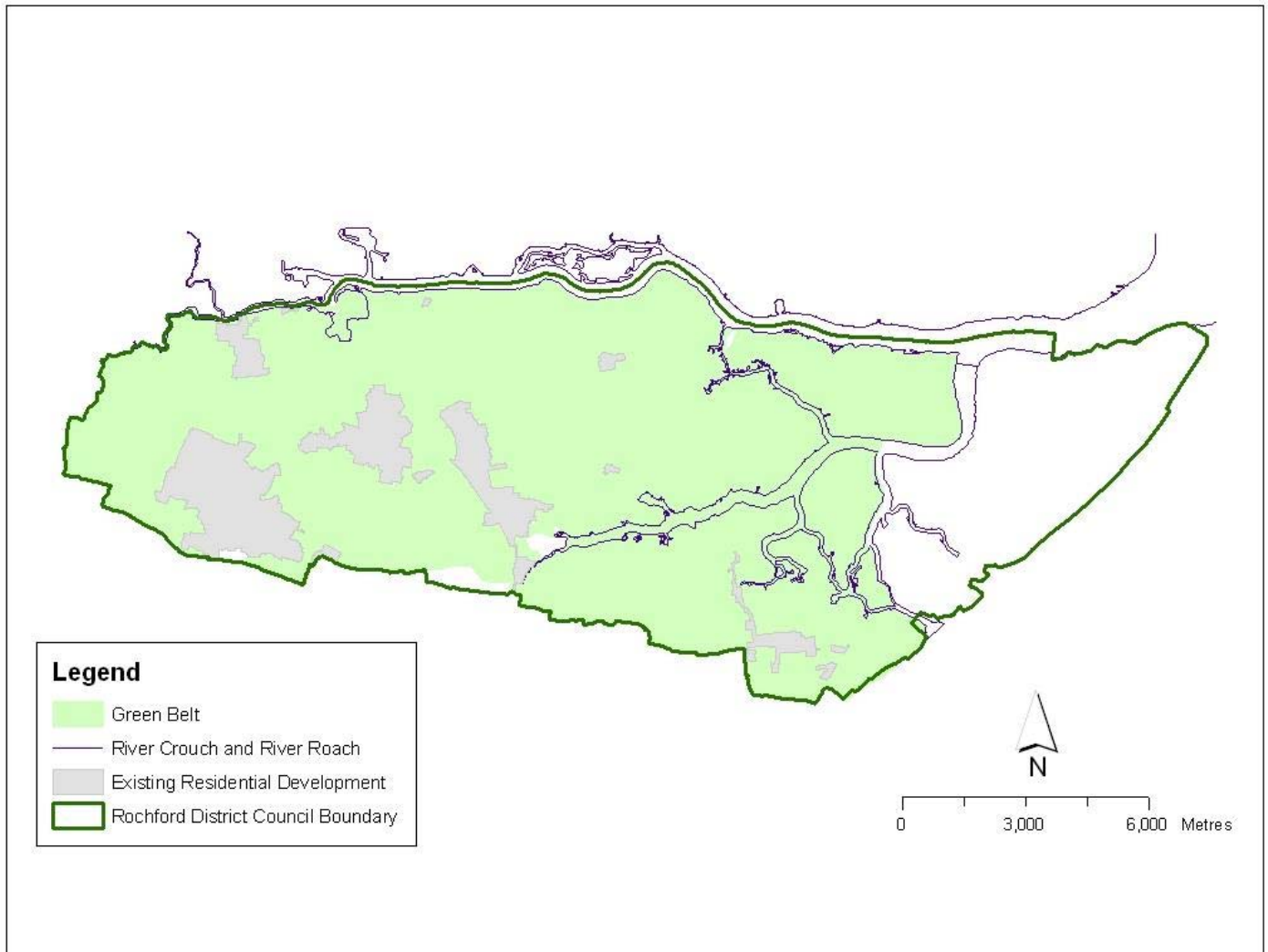
Map 1 – Flood Zones 2 and 3



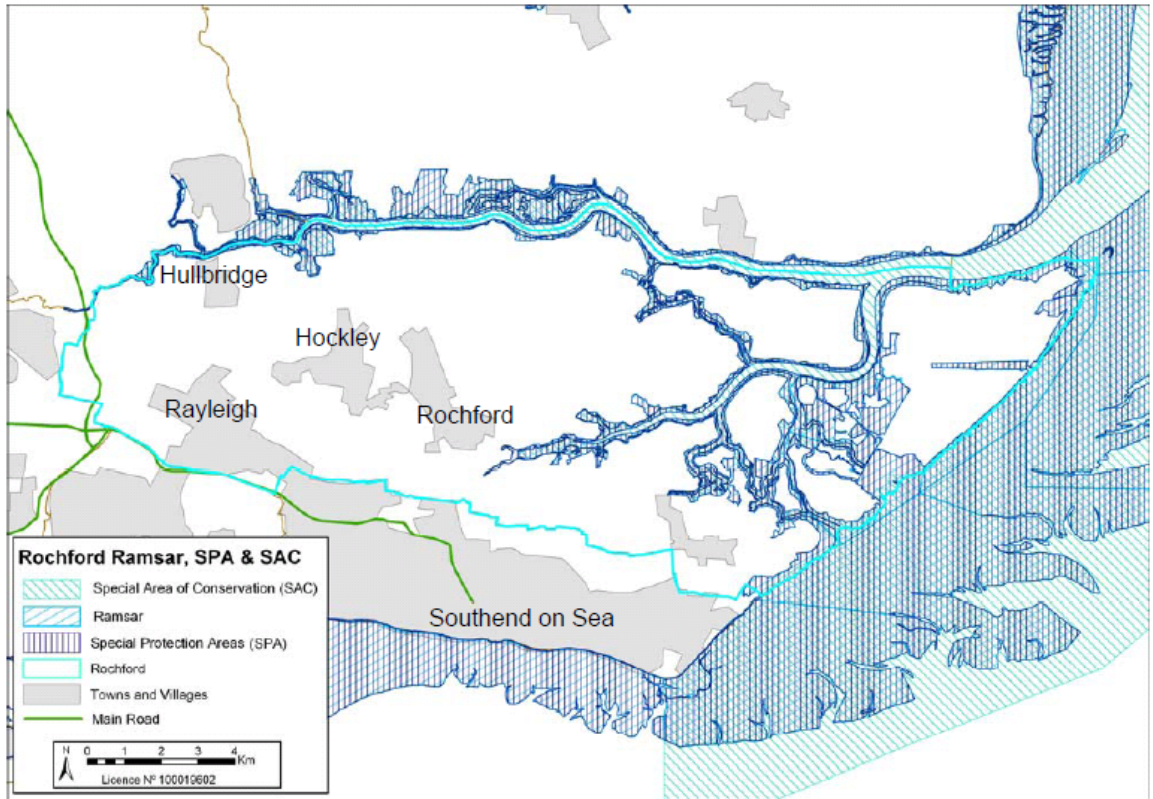
4.3 However, the majority of the District is also subject to a number of constraints that restrict development, including:

- 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

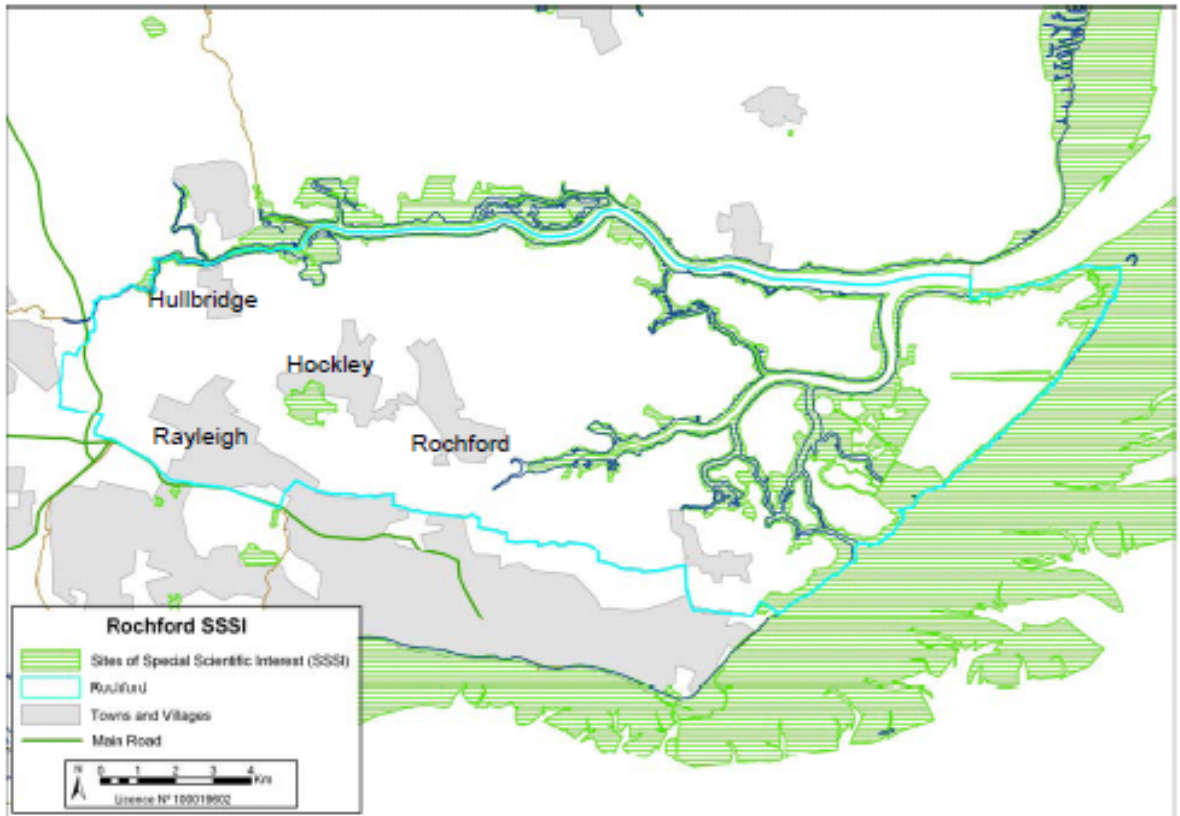


Map 3 – Ramsars, Special Protection Areas (SPAs) and Special Areas of Conservation (SACs)



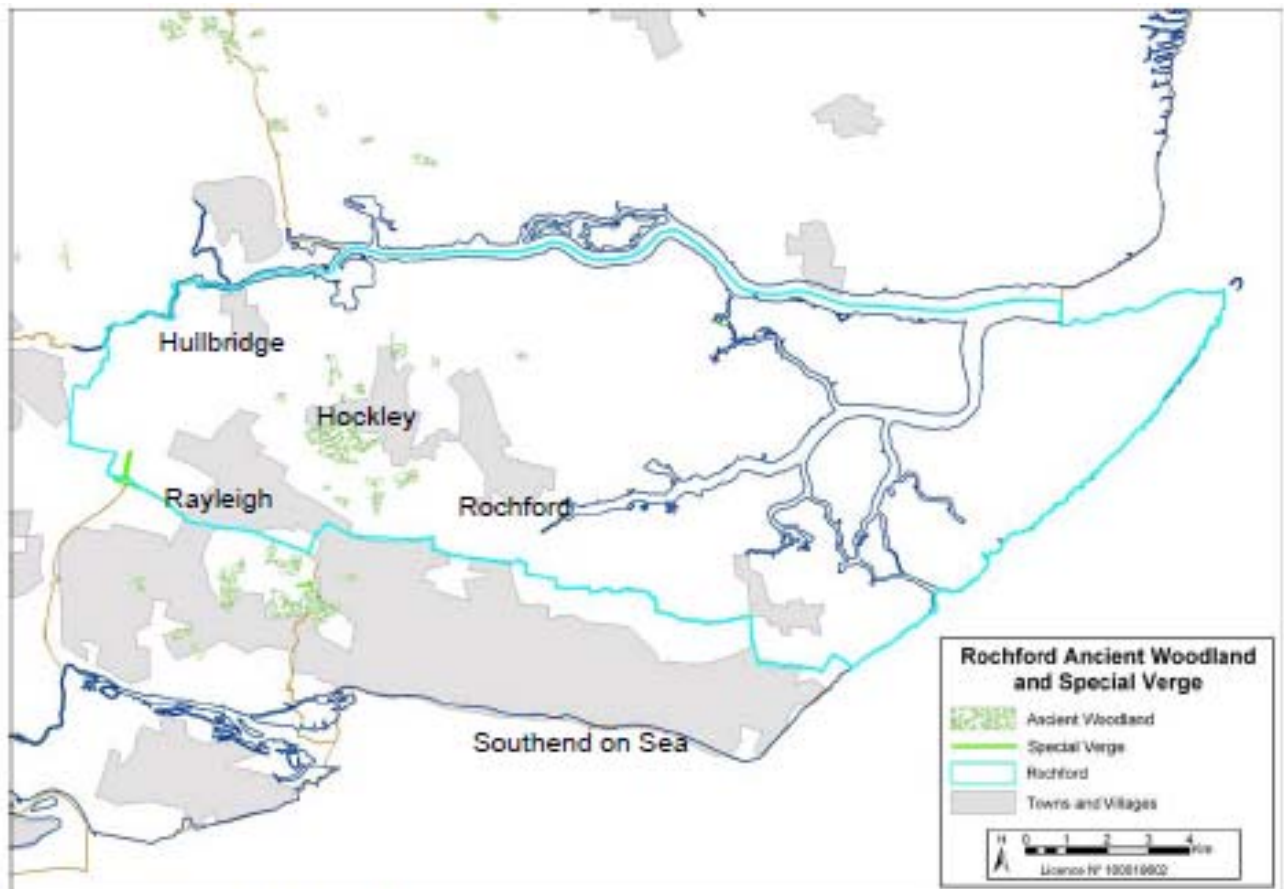
Source: Essex County Council 2008

Map 4 – Sites of Special Scientific Interest



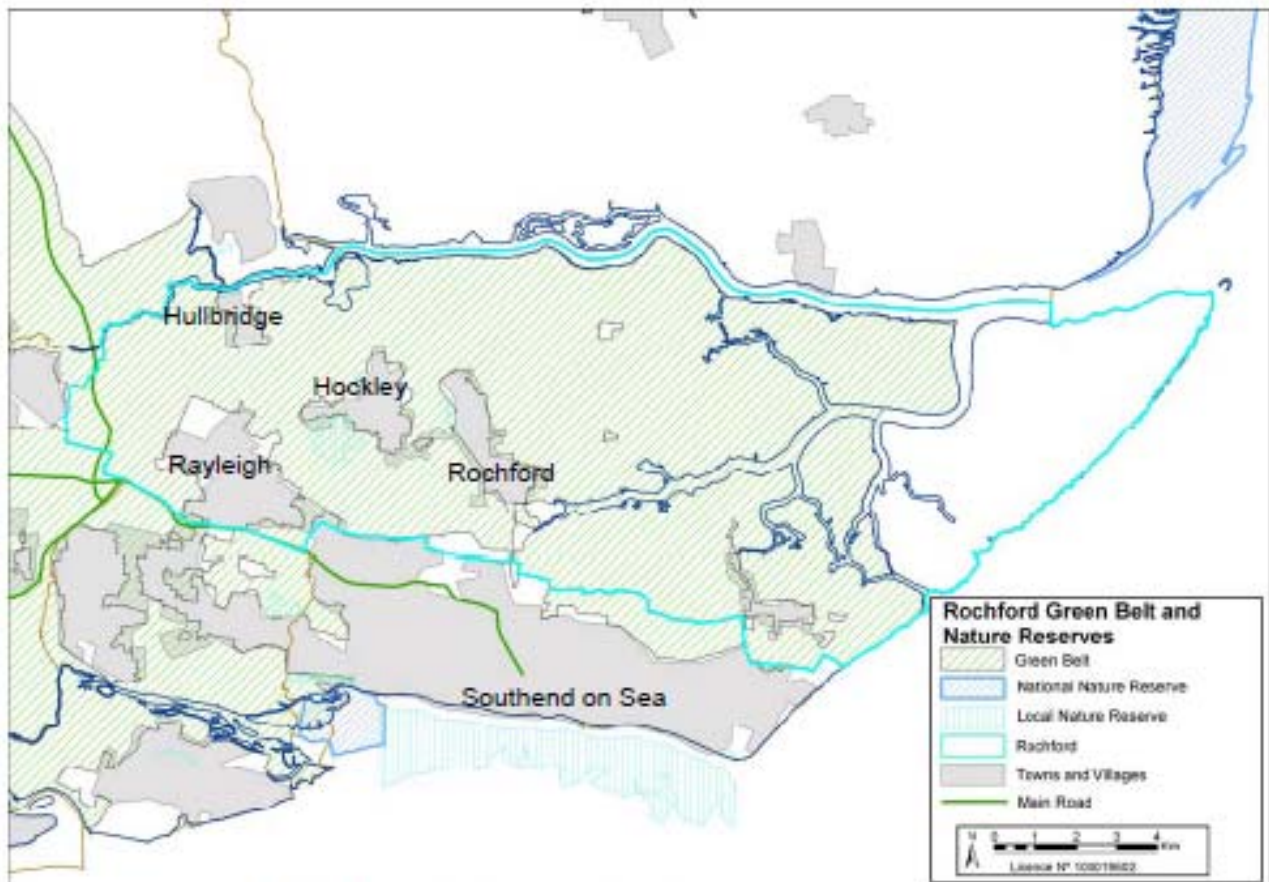
Source: Essex County Council 2008

Map 5 – Ancient Woodland and Special Verges



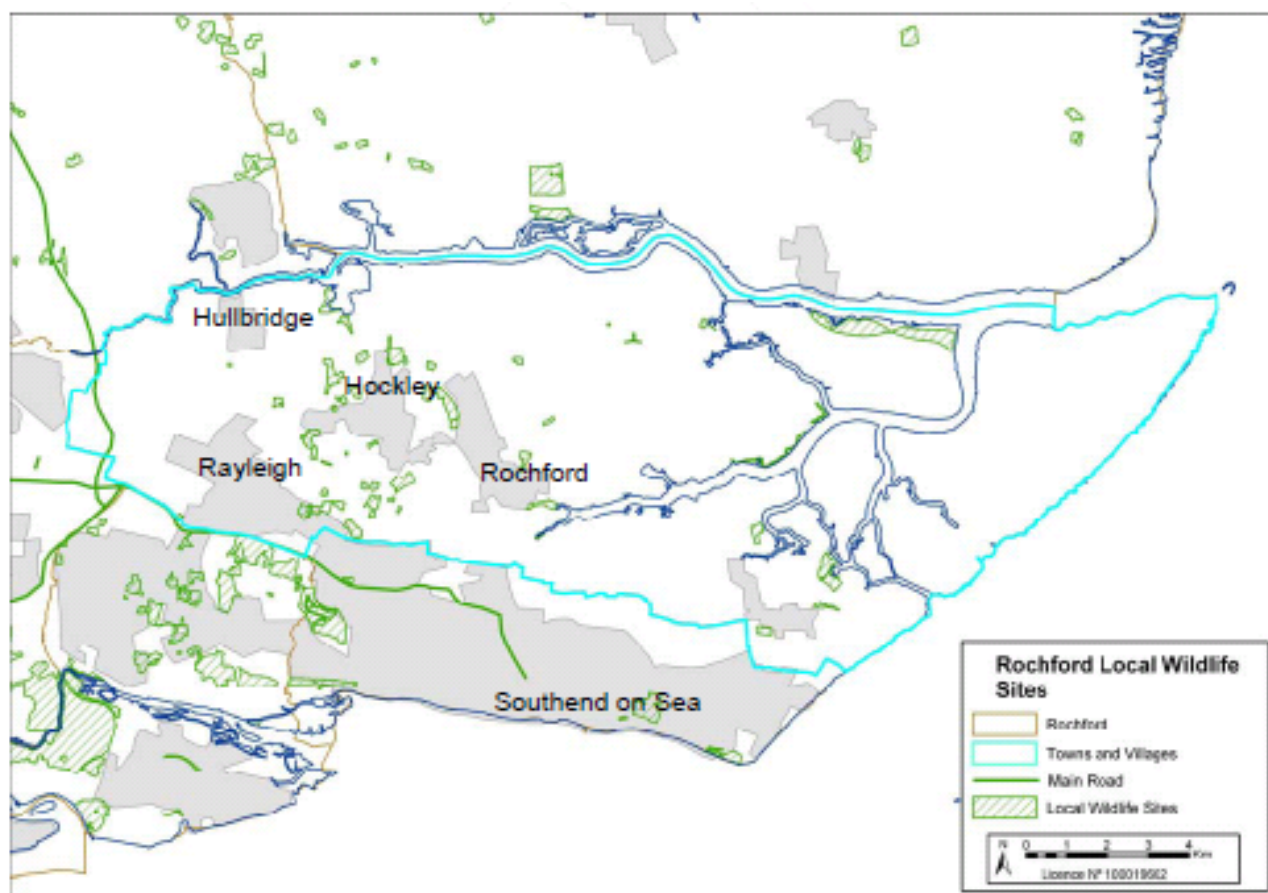
Source: Essex County Council 2007

Map 6 – Local Nature Reserves



Source: Essex County Council 2008

Map 7 – Local Wildlife Sites

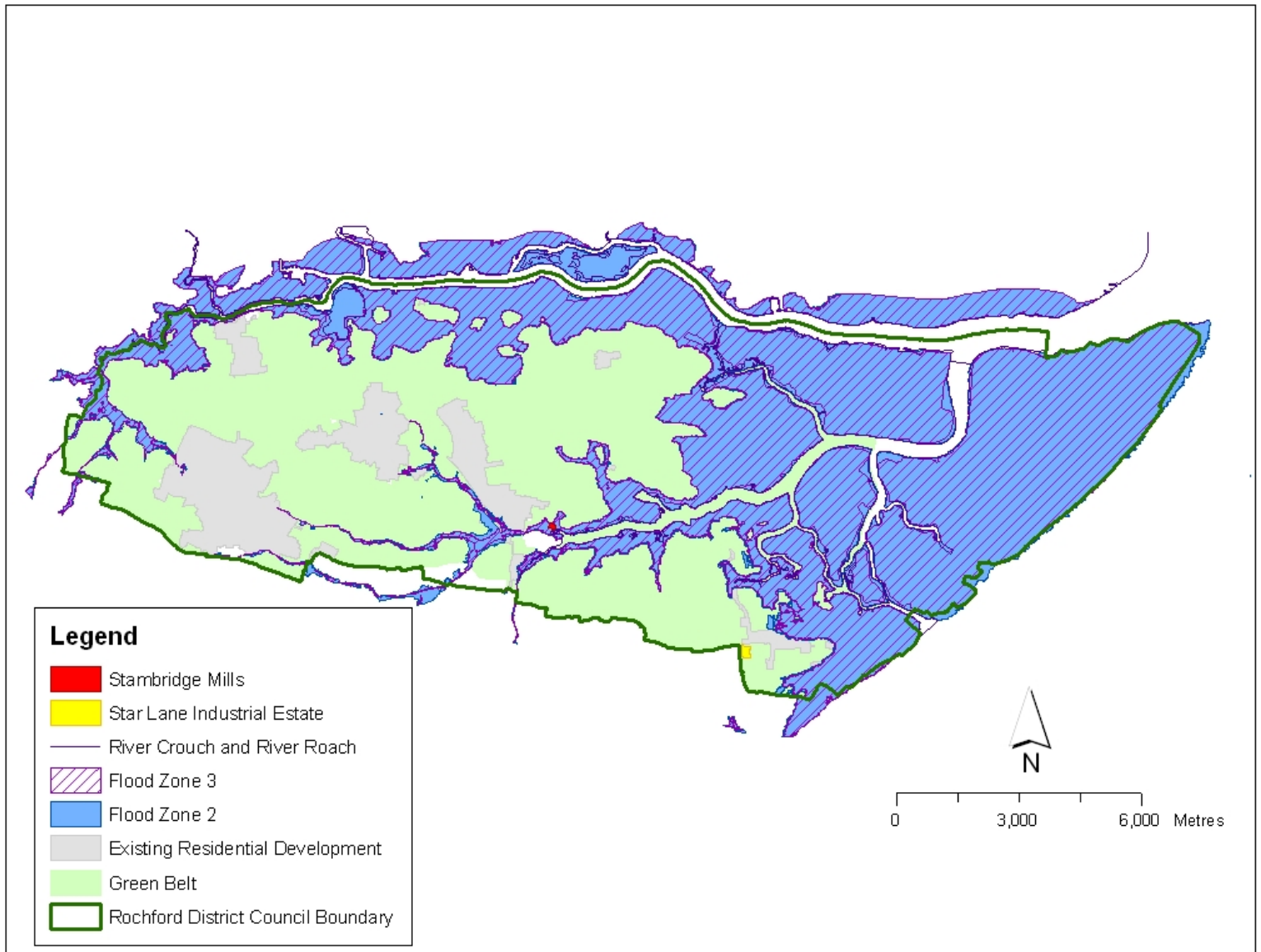


Source: Essex County Council 2008

- 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.

Core Strategy Topic Paper 1 – Appendix A

Land type	Assessment of appropriateness for residential development	Appropriate to consider reasonably available for residential development when applying the PPS25 sequential test?
Green Belt	<p>PPG2 states that residential development in the Green Belt is inappropriate.</p> <p>It is noted that the SHLAA demonstrates some Green Belt release is required in the District in order for the housing requirement to be met, even accounting for development at Stambridge Mills.</p> <p>However, PPS25 notes that in applying the sequential test, Local Planning Authorities must demonstrate that no reasonably available sites in areas with a lower probability of flooding that would be <i>appropriate</i> to the type of development or land use proposed. PPG2 makes clear that residential development within the Green Belt is <i>inappropriate</i>. As such, in applying the sequential test Green Belt land should not be considered ahead of allocated sites.</p>	No
Ramsar Sites	Ramsar sites are European designated sites, as part of the Natura 2000 network. The Habitat directive protects these sites and requires appropriate measures to reduce potential adverse impacts arising from development proposals.	No

	<p>The UK Government signed the Convention on Wetlands of International Importance especially for Waterfowl Habitat (the Ramsar Convention) in 1973. Ramsar sites are areas which have been formally 'listed' (designated) as Wetlands of International Importance by the Secretary of State.</p> <p>Ramsar sites are required to be protected from development which could undermine their ecological importance. As such, they cannot be considered appropriate areas for residential development.</p>	
<p>Special Protection Areas (SPAs)</p>	<p>Special Protection Areas (SPAs) are areas classified by the Secretary of State, under the Directive 79/409/EEC on the Conservation of Wild Birds, adopted in 1979. This is a European designation as part of the Natura 2000 network. This Directive applies to birds, their eggs, nests and habitats, providing protection, management and control of all species of naturally occurring wild birds in the European territory. It requires Member States to take measures to preserve a sufficient diversity of habitats for these wild bird species to maintain populations at ecologically and scientifically sound levels. It also requires Member States to take special measures to conserve the habitats of certain particularly rare species and of migratory species.</p> <p>Having regard to the above, SPAs cannot be considered appropriate areas for residential development.</p>	<p>No</p>

Special Areas of Conservation (SACs)	<p>Special Areas of Conservation (SACs) and candidate Special Areas of Conservation (cSACs) are designated by the European Commission after a period of consultation under article 3 of the Habitats Directive (EC Council Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora, 1992). These are European designations as part of the Natura 2000 network. This directive requires Member States to maintain or restore habitats and species at a favourable conservation status in the community. Special Protection Areas for birds (SPAs) and SACs will together make up a network of sites in Europe called Natura 2000.</p> <p>Given the above requirements, SACs cannot be considered appropriate areas for residential development.</p>	No
Ancient Woodlands	<p>There are 14 ancient woodlands in Rochford District, defined by the Natural England as being woodlands over 2 hectares in size, known to have existed in 1600. These areas have evolved unique characteristics and qualities throughout the centuries and are vital for their scientific and amenity importance. As such, they cannot be considered appropriate areas for residential development.</p>	No
Special Verges	<p>Roadside Verges are important and if sensitively managed they can increase the biodiversity of the</p>	No

	<p>verges themselves and from that also the surrounding countryside. Verges can act as corridors interlinking fragmented or isolated habitats. In terms of wildlife value, verges can be split into three broad types:</p> <ul style="list-style-type: none"> • Landscaped and intensively managed verges: poorest quality. • Recently created verges left to colonise naturally: vary in ecological value. • Ancient verges: often of high ecological value. <p>In the 1970s, Essex County Council Highways Agency, Nature Conservancy Council and Essex Wildlife Trust identified a number of important verges which were subsequently designated as Special Roadside Nature Reserves. They aim to protect the future of rare and uncommon flowers growing on them.</p> <p>The nature of such sites – small strips of land, adjacent to roads – is not conducive to residential development. In any case, their ecological importance means that they cannot be considered appropriate sites for residential development.</p>	
Local Nature Reserves (LNRs)	Habitats of local significance contribute both to nature conservation and provide opportunities for the public to see learn about and enjoy wildlife. LNRs comprise a substantial part of the District's identified wildlife habitats and also significantly contribute to the District's biodiversity resource. Given the ecological importance	No

	of such sites, they cannot be considered appropriate for residential development.	
Local Wildlife Sites (LoWSs)	<p>Local Wildlife Sites (LoWSs) are areas of land with significant wildlife value. Together with statutory protected areas, LoWSs represent the minimum habitat required to be protected in order to maintain the current levels of wildlife in Essex.</p> <p>Given the ecological importance of LoWSs, they cannot be considered appropriate areas for residential development.</p>	No

Core Strategy Topic Paper 1 – Appendix B

Site	Land type	Assessment of appropriateness for residential development	Is site appropriate and reasonably available for residential development?	Can site accommodate additional residential development in addition to that identified in the SHLAA?
Rawreth Industrial Estate	Employment land	<p>The Employment Land Study identified that site as being of poor quality for employment uses, and recommended that the Council consider allowing a reallocation of this site to housing, provided that the requisite industrial employment land is provided elsewhere, preferably on a portion of the green belt land West of Rayleigh.</p> <p>The site is identified in the SHLAA as being appropriate for housing, although it is not projected to come forward for residential development until 2017-18.</p>	Yes, but not immediately available.	No. SHLAA identifies appropriate capacity for the site based on a density of 45 dwelling per hectare.
Star Lane Industrial Estate	Employment land	Site comprises disused brickworks to the south and an employment site containing range of industrial	Yes.	No. The SHLAA identifies an appropriate capacity for the site

		<p>uses to the north. Site consists of a range of buildings structures and hardstandings.</p> <p>The Employment Land Study states that the quality of existing stock is very poor and its strategic location is also poor. The study recommends that the Council consider reallocating this site for other uses.</p> <p>The SHLAA has assessed the site and determined a residential capacity for it, which has been included in the District's housing supply chain.</p>		based on a density of 40 dwellings per hectare.
Baltic Wharf	Employment land	<p>This employment site is in an isolated location detached from any of the District's settlements.</p> <p>The Employment Land Study found that the site adequately serves its current purpose in providing employment in port related activities. The study recommended that the Council safeguard the existing employment land at this site.</p>	No	No

Ashington Road Industrial Estate	Employment Land	<p>This site is an existing employment area currently in use.</p> <p>The Employment Land Study found this site is a fit for purpose industrial estate and recommended that Rochford District Council keep this site in its current use.</p>	No	No
Riverside Industrial Estate	Employment Land	<p>This site is an existing employment area currently in use.</p> <p>The Employment Land Study found that this site is strategically well located for office use and recommended that the Council take action to improve the quality of employment stock there.</p>	No	No
Purdeys Industrial Estate	Employment Land	<p>Large existing employment site.</p> <p>The Employment Land Study found that it is a fit for purpose industrial estate which should be maintained and, if possible, expanded.</p>	No	No
Imperial Park Industrial Estate	Employment Land	<p>This site is an existing employment area currently in use.</p> <p>The Employment Land Study</p>	No	No

		found that it is a fit for purpose industrial estate and recommended that Rochford District Council protects this site in its current use.		
Brook Road Industrial Estate	Employment Land	<p>This site is an existing employment area currently in use.</p> <p>The Employment Land Study found that the site is strategically well placed and connected, and recommended that the Council make improvements to the quality of the estate in order to make it more attractive to high quality office uses.</p>	No	No
Eldon Way / Foundry Estate	Employment land	<p>Initial studies undertaken as part of work on the Hockley Area Action Plan acknowledged the potential for this employment area to be redeveloped for a range of uses more appropriate for a town centre location in the long-term. The SHLAA determines that the site has a capacity of circa 150 dwellings. The SHLAA notes that if the whole site were to be redeveloped the</p>	Yes, but not immediately and subject to Hockley Area Action Plan.	No. SHLAA identifies appropriate capacity for site.

		<p>capacity would be considerably greater than 150, but takes a conservative figure for the residential capacity as a range of other uses are likely to be sought for the site, as promoted by the emerging Core Strategy. The exact nature of redevelopment would be determined through the Hockley Area Action Plan. As such, it cannot be stated that the accommodation of more than 150 dwellings at the site is reasonably available.</p>		
<p>Hockley town centre (excluding Eldon Way / Foundry Estate)</p>	<p>Town centre</p>	<p>The area is allocated as town centre in the 2006 Rochford District Replacement Local Plan.</p> <p>Eldon Way / Foundry estate currently sits outside of the town centre as designated in the Development Plan, and has been considered separately in this assessment.</p> <p>It is noted that the emerging Core Strategy states that an Area Action Plan will be produced which will explore the potential for residential uses to be</p>	<p>No. Potential will be explored through Hockley Area Action Plan, but not currently reasonably available.</p>	<p>No</p>

		accommodated within this area. However, with the exception of sites already identified through the SHLAA, it is unclear whether additional sites are available.		
Rayleigh town centre	Town centre	It is noted that the emerging Core Strategy states that an Area Action Plan will be produced which will explore the potential for residential uses to be accommodated within this area. However, with the exception of sites already identified through the SHLAA, it is unclear whether additional sites are available.	No. Potential will be explored through Rayleigh Town Centre Area Action Plan, but not currently reasonably available.	No
Rochford town centre	Town centre	It is noted that the emerging Core Strategy states that an Area Action Plan will be produced which will explore the potential for residential uses to be accommodated within this area. However, with the exception of sites already identified through the SHLAA, it is unclear whether additional sites are available.	No. Potential will be explored through Rochford Town Centre Area Action Plan, but not currently reasonably available.	No
Existing residential areas	Residential	The current Green Belt boundary is drawn tightly around the existing residential areas. The SHLAA includes an assessment of sites	Yes, with regards to sites identified. Potential	No

		within existing residential areas. Intensification may provide additional dwellings from as yet unidentified sites that become available through time but, by definition, such sites cannot be accounted for at this stage.	intensification through the development of as yet unidentified sites cannot be considered readily available.	
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