

## **ROCHFORD CORE STRATEGY**

### **NATIONAL PLANNING POLICY FRAMEWORK COMPLIANCE REVIEW**

#### **Purpose of the report**

Rochford District Council adopted its Core Strategy on 13 December 2011. The RCS was produced in accordance with national and regional planning policy in place at that time.

The Government published the National Planning Policy Framework on the 27<sup>th</sup> of March 2012. This set out new national planning policy and superseded many planning policy statements and other guidance that had been built up over a number of years.

The NPPF states (paragraph 211-215) that:

“For the purposes of decision-taking, the policies in the Local Plan (and the London Plan) should not be considered out-of-date simply because they were adopted prior to the publication of this Framework.

“However, the policies contained in this Framework are material considerations which local planning authorities should take into account from the day of its publication. The Framework must also be taken into account in the preparation of plans.

“Plans may, therefore, need to be revised to take into account the policies in this Framework. This should be progressed as quickly as possible, either through a partial review or by preparing a new plan.

“For 12 months from the day of publication, decision-takers may continue to give full weight to relevant policies adopted since 2004 even if there is a limited degree of conflict with this Framework.

“In other cases and following this 12-month period, due weight should be given to relevant policies in existing plans according to their degree of consistency with this framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given)”

As such, it is necessary to consider whether policies in the RCS conflict with those in the NPPF.

To help Local Planning Authorities bring their Local Plans and policies up to date with NPPF the Planning Advisory Service (PAS) produced a check list that would allow Local Authorities to test their existing policies against a series of key questions. These questions would allow LPAs to identify any major challenges to the compatibility of their policies with the NPPF. Rochford District Council's assessment of the compliance of their RCS with the NPPF uses this check list.

### **Summary of Findings**

This compliance review concludes that the RCS is broadly in compliance with the NPPF.

However, whilst the RCS was produced accounting for evidence that was in place at the time, it should be acknowledged that new evidence is constantly emerging. For example, the RCS accounted for objectively identified housing needs, but the NPPF now requires a different form of assessment in this regard; A Strategic Housing Market Assessment must be prepared and the results accounted for in Local Plans. As such, whilst it is concluded the RCS does not conflict with the NPPF in this regard per se, it is acknowledged that it will be necessary for a future review of the RCS to be informed by a new and updated Strategic Housing Market Assessment.

What NPPF expects local plans to include to deliver its objectives	What NPPF expects local plans to include to deliver its objectives	Response
<p><b>Presumption in Favour Of Sustainable Development:</b></p>	<p>Does the plan positively seek opportunities to meet the development needs of the area?</p>	<p>The Council has taken an array of documents/reports into account when producing the RCS (RCS), including those which consider the development needs of the District. These include the Sustainable Communities Strategy, which sets out the following key priorities to ensure that the District develops sustainably:</p> <ul style="list-style-type: none"> <li>• Supporting the Ageing Population;</li> <li>• Fostering Greater Community Cohesion;</li> <li>• Strengthening the Third Sector (Voluntary sector);</li> <li>• Increasing Accessibility to Services;</li> <li>• Keeping Rochford Safe;</li> <li>• Encouraging Economic Development: Skills; Employment and Enterprise;</li> <li>• Promoting a Greener District.</li> </ul> <p>The RCS puts a policy framework in place to deliver housing and employment development needs, which have been determined by the Regional Spatial Strategy, Strategic Housing Market Assessment, Employment Land Study, and Retail and Leisure Study.</p> <p>The RCS seeks to strike a balance between the need for economic growth and the need to ensure that development is focused in areas in which the benefits of development will be most strongly felt, the most sustainable locations; and where the negative</p>

		aspects will have the least effect on the natural, historical, and cultural integrity of the District.
	Does the plan meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, (subject to the caveats set out in para 14)?	<p>It has been identified that 250 new homes per annum must be provided within Rochford District for the plan period. The RCS puts in place a framework to facilitate this development.</p> <p>The RCS sets out plans for delivering housing beyond 2015 which supports both the requirements of paragraph 14 in the NPPF and the requirement to proactively seek opportunities to meet the housing need. It also provides the Council with a buffer to meet any unforeseen demand or situation that may arise.</p> <p>The RCS complies with paragraph 14 of the NPPF. It aims to meet its objectively assessed housing demand and to deliver a balanced strategy focusing development within the most sustainable locations. It also takes social, economic and environmental considerations into account so that the integrity of the existing settlements is maintained and rural services can continue to function.</p> <p>It has been necessary to release some Green Belt land for development in order to meet the objectively assessed demand for housing in the District. This release is being managed as to ensure that the majority of the Green Belt is protected and that it is still able to form a buffer to prevent urban sprawl and the merging of the District's settlements.</p>
	Do you have a policy or policies which reflect	Policies H1 and H2 exemplify the principles of the

	<p>the principles of the presumption in favour of sustainable development? A model policy is provided on the Planning Portal in the Local Plans section, as a suggestion (but this isn't prescriptive)</p>	<p>presumption in favour of sustainable development. The policies identify an objectively assessed need in terms of housing over a given plan period and explain how the Council intends to meet that need. They also seek to ensure that development will be focused in sustainable areas with good links to the District's infrastructure.</p> <p>The RCS does not include any prescriptive model policies regarding sustainable development. However there are a number of policies which ensure that development will be sustainable. 'Policy H1 – The efficient use of land for housing' establishes that any new development should give proper consideration to infrastructure requirements, which are outlined in Appendix H1. Initially development should be focused on previously developed land (PDL) and that where this is not possible it should be sought through extensions to the residential envelopes of existing settlements. Over intensification and infilling of settlements is also discouraged so that the character of the settlements is protected.</p> <p>'Policy H2 – Extensions to residential envelopes and phasing' shows the quantum of development for the settlement areas of Rochford District. The RCS covers the intended extensions to residential envelopes that are planned to take place after 2021 and the end of the plan period.</p> <p>The RCS is supported by Sustainability Appraisal which concluded that the plan would make a significant contribution to sustainability in the District, with a</p>
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		<p>particularly strong focus on meeting housing and community needs, enhancing accessibility and protecting the District's natural environment.</p>
	<p>Does the plan meet up-to-date, objectively assessed development needs based on evidence?</p>	<p>The RCS uses evidence gathered from documents such as the Strategic Housing Land Availability Assessment (SHLAA), Strategic Housing Market Assessment (SHMA – specifically the Thames Gateway South Essex SHMA) and Annual Monitoring Report to formulate its policies. It also accords with the Regional Spatial Strategy, which in turn is underpinned by an evidence base, though it is noted that the RSS has now been revoked.</p> <p>Several of the evidence base documents that underpin the RCS will soon be updated. A new SHMA will be available in 2013. The RSS has been revoked, but the evidence base that underpinned it is still relevant; key parts of the evidence base, demographic forecasts for example, will be subject to review, reflecting the relevance and importance of such information to plan preparation..</p> <p>Although updates to the evidence base will need to be reflected in the RCS review in future, it is not considered likely that updates to empirical data on issues such as development needs will render obsolete the strategic approach to managing development set out in the RCS.</p> <p>It will also be necessary to take account of the 2011 Census and the findings of an updated SHLAA in order to identify any issues which will need to be incorporated into the RCS review.</p>

		<p>One key issue in respect of housing need is that currently the RCS relies on the figures provided in the now revoked Regional Spatial Strategy, but the NPPF requires local planning authorities to calculate local housing figures, based on objectively assessed needs.</p> <p>In response to this requirement, Rochford in conjunction with other local authorities in the sub-region has commissioned a new SHMA to provide an up to date assessment of the housing market in South Essex.</p> <p>The new SHMA will be an important consideration in the preparation of policies for the RCS review. In the meantime, it is considered appropriate for the housing figures provided in the RSS to be used as the basis for Rochford's approach to housing development.</p>
	<p>Does it make effective use of land and specifically promote mixed use development?</p>	<p>Policy H3 sets out the Council's policy for the extension of residential settlements to meet housing need, and requires development within the areas it identifies to include a range of other uses and infrastructure. The infrastructure that will be required in new developments is outlined in Appendix H1 of the RCS.</p> <p>A mix of housing types and tenure is required to ensure that the need for affordable housing identified in the most recent SHMA can be met. The specific affordable housing requirements for the District can be found in Policy H4.</p> <p>The Thames Gateway South Essex SHMA 2010</p>

		identified a significant need for affordable housing in the District. As such Policy H4 requires at least 35% of dwellings on all developments of 15 or more units or on sites of more than 0.5 Hectares to be affordable.
	Does it take account of wider geographic areas e.g. cross boundary and strategic issues?	<p>The RCS acknowledges the strong cross boundary relationship that the District has with areas including Basildon, Southend-on-Sea, and Castle Point, and the wider influence of London. It also acknowledges the significant level of commuter activity out of the District, as well as the economic draw from other locations. The RCS makes providing adequate transport infrastructure to locations outside of the district a high priority as well as ensuring that there is good access to key attractors in the District, such as London Southend Airport.</p> <p>The Council is working with the authorities in the Thames Gateway South Essex Sub Region to prepare a new Thames Gateway South Essex SHMA. This will enable the South Essex authorities to form complimentary policies based on the same objectively assessed data. In addition, other evidence base documents are produced in conjunction with neighbouring authorities to ensure cross boundary issues are considered.</p>
<b>Economic vision for the area, which proactively encourages sustainable economic growth (para 21)</b>	How far does the plan articulate a clear economic vision for the area? Are the policies flexible enough to accommodate requirements not anticipated in the plan and allow a rapid response to changes in economic circumstances? (21)	The RCS acknowledges that the District is small and reasonably productive, but with significant out commuting and reliance on major shopping centres outside of the District. 30% of the population travel to work in Southend, 14% to London, 9% to Basildon and 15% travel elsewhere in the District.



		<p>Chapter 11 of the RCS provides detailed short, medium and long term aspirations for the development of the economy. This is backed up by data gathered from an Employment Land Study, which covers the demand in square metres for office and industrial space as well as trends in employment in the district. The study identifies the opportunities and barriers to development in the District, and these are addressed by the RCS.</p> <p>The RCS identifies the need for more knowledge based jobs in the District. It also aims to develop leisure, recreation and tourism as employment focuses.</p> <p>Policy ED1 encourages the diversification of the District's economy through the growth of existing businesses and by encouraging new enterprise. It provides a comprehensive overview of the initiatives which the Council will support in order to ensure the District's economic future.</p> <p>Policy ED1 identifies the major sites which the Council will support for development. Specific schemes such as an Eco-Enterprise Centre and skills training academy would ensure that the District benefits from an increase in its skills base as well as an increase in awareness and support for rural diversification.</p> <p>The RCS identifies the potential of London Southend Airport as a focus for a variety of employment types. Developing these themes will help the District adapt to unforeseen economic changes by giving it a more robust and varied economic base.</p>
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	<p>In supporting economic development to what extent does it take into account the matters raised in paragraph 21 of the NPPF? This includes local and inward investment; supporting existing business sectors and new / emerging sectors; clusters and networks of knowledge / creative/high technology industries; economic regeneration, infrastructure provision and environmental enhancement; new working practices</p>	<p>The RCS links its section on economic development to the sections on rural diversification and transport. This allows the plan to show a cross thematic assessment of the economic situation of the District.</p> <p>Barriers to investment and future economic growth are identified, such as the rural nature of the District and limited transport links. The RCS then provides opportunities for mitigating the obstacles including improving the transport infrastructure links to key sites. The non-physical barriers to development that are identified include a lack of skills in some sectors and a shortage of support for sustainable economic activities within the Green Belt. Taking these factors into account, the RCS sets out robust policies to encourage employment growth through improvements, including encouraging appropriate development in rural areas, enhancing local employment opportunities, and realising the economic potential of the District's assets (including London Southend Airport).</p>
	<p>Is there an up to date assessment of the deliverability of allocated employment sites, to meet local needs, to justify their long-term protection (taking into account that LPAs should avoid the long term protection of sites</p>	<p>RCS Policy ED4 sets out the Council's plan for future employment land allocations. Whilst the RCS outlines the primary general locations for employment sites, further analysis of the deliverability of different site options within these general locations are available in</p>

	<p>allocated for employment use where there is no reasonable prospect of an allocated site being used for that purpose) para (22).</p>	<p>the SHLAA; and considered further in the Allocations Document, and through specific Area Action Plans.</p> <p>In addition, the RCS is evidenced by an Employment Land Study.</p>
<p><b>Positive policies to encourage competitive town centre environments and to encourage growth over the plan period (Para23)</b></p>	<p>To what extent does the plan and its policies have regard to the criteria set out in paragraph 23 of the NPPF for the management and growth of town centres over the plan period? This includes such matters as definition of networks and hierarchies; defining town centres; encouragement of residential development on appropriate sites; allocation of appropriate edge of centre sites where suitable and viable town centre sites are not available; consideration of retail and leisure proposals which cannot be accommodated in or adjacent to town centres.</p>	<p>The RCS encourages strong town centres with well defined boundaries. It directs retail to these central locations and plans to make improvements to services where necessary.</p> <p>The RCS recognises that the majority of large scale retail spending flows from the district, particularly to stores in Southend and Basildon. It also identifies the strongest areas of spending retention in the District such as Rayleigh. Policy RTC1 directs retail to the core of the District's key settlements (Rayleigh, Hockley and Rochford). This is in keeping with the requirement in the NPPF that Local Planning Authorities should ensure that town centres are at the heart of their communities and the need to provide policies to support their viability and vitality. The RCS establishes a clear settlement hierarchy in Policy RTC2. Table RTC1 elaborates on this by demonstrating the relative significance of local centres in and out of the District.</p> <p>The RCS uses the 2008 Retail and Leisure Study to support its policies on the economic needs of the District.</p> <p>The RCS proposes the preparation of Area Action Plans for Hockley, Rayleigh and Rochford town centres, to</p>

		enhance their vitality and vibrancy.
<b>Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community services and residential development needed in town centres (23)</b>	Have you undertaken an assessment of the need to expand your town centre, considering the needs of town centre uses?	<p>The RCS shows that the District's town centres can accommodate significant enhancement in terms of their retail and leisure facilities without needing to be greatly expanded.</p> <p>Paragraph 11.9 of the RCS shows the demand for office and industrial land within the District set against scenarios for development within the London Southend Airport &amp; Environs Joint Area Action Plan area. The table indicates the requirement in square metres and hectares that the Council needs to allocate.</p> <p>The RCS is evidenced by a Retail and Leisure Study and Employment Land Study.</p>
	Have you identified primary and secondary shopping frontages?	The RCS is a strategic document, through which it would not be appropriate to address such details. However, the primary and secondary frontages will be defined in the Allocations Development Plan Document and/or area action plans as appropriate.
<b>Assess the impact of retail and leisure and office proposals (26)</b>	Has it assessed the impact of the policy on existing, committed and planned public and private investment in a centre or centres in the catchment area?	This will be considered through the determination of planning applications.
<b>Support sustainable economic growth in rural areas by taking a positive approach to</b>	Do your policies align with the objectives of para 28? These include policies to support sustainable growth of rural businesses; promote the development and diversification of agricultural businesses; support	The RCS pays considerable attention to the economic character of the Green Belt. It points out that although the majority of the district is Green Belt, only 3% of its VAT registered businesses are agricultural. As such it supports the diversification of economic activity in the

<p><b>new development. Planning strategies should maintain a prosperous rural economy by taking a positive approach to new development. (28)</b></p>	<p>sustainable rural tourism and leisure developments</p>	<p>Green Belt.</p> <p>Despite the need for more economic development in the Green Belt, there are concerns over how sustainable certain forms of development will be if located in the Green Belt, which reflects the rural more isolated parts of the District. As such only activities which the Council considers appropriate will be considered. Policy GB2 set out which forms of rural diversification will be permitted. The policy means that the Council can ensure that there is positive and sustainable development within the Green Belt and that any development which does occur will not have an adverse effect on the objectives of the Green Belt.</p> <p>Activities such as green tourism including walking, cycling and bird watching will be encouraged to open up the Green Belt to a variety of suitable uses. Existing buildings will be retained for small scale employment use because they would not have too much additional impact on the area. Outdoor recreation activities will also be encouraged as they will have a minimal impact on the openness of the Green Belt.</p>
<p><b>Does your core strategy promote Sustainable Transport?</b></p>	<p>Have you worked with adjoining authorities and transport providers on the provision of viable infrastructure?</p> <p>Does it have any policies which plan for ports, airports or airfields which are not subject to a separate national policy statement in accordance with the considerations set out in</p>	<p>The RCS has been prepared in consultation with Essex County Council (the relevant Highways authority) and also takes account of the emerging policies within neighbouring areas.</p> <p>The RCS commits the Council to produce a Joint Area Action Plan with Southend-on-Sea Borough Council for London Southend Airport and its environs; the plan looks</p>

	paragraph 33 of the NPPF?	<p>in detail at transport issues.</p> <p>The work with neighbouring authorities has resulted in the inclusion in the RCS of a number of transport policies.</p>
<b>Support the expansion of the electronic communications networks, including telecommunications' masts and high speed broadband (43)</b>	To what extent has a ban been imposed on new telecommunications' development in certain areas or restrictions place? (44)	<p>The RCS is a strategic document that does not address such issues; this will be considered in the Development Management DPD.</p> <p>No ban has been imposed on new telecommunications development in the district through the RCS. Applications to develop telecommunications infrastructure will be dealt with in the usual manner by the Development Management team.</p>
<b>Aim to keep the numbers of radio and telecommunications masts and the sites to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used, unless the need for a new site has been justified. Where new sites are required, equipment</b>	<p>Do policies identify the need for communications infrastructure not to cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest? (44)</p> <p>Does it have policies to ensure that the construction of new buildings or other structures do not cause interference with broadcast and telecommunications services? (44)</p>	No, the RCS does not identify this as a significant issue.

<p><b>should be sympathetically designed and camouflaged where possible.(43)</b></p>		
<p><b>Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of 5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land (47).</b></p>	<p>What is your record of housing delivery?</p>	<p>The Council's Annual Monitoring Reports indicate that housing delivery in recent years has generally been below that required by the RSS, which although now revoked, underpinned the housing allocations. However, the RCS allocates land to increase housing delivery to about 250 homes per annum over the plan period.</p>
	<p>Have you identified?  a) five years or more supply of specific deliverable sites;  b) an additional buffer of 5% (moved forward from later in the plan period), or  c) If there has been a record of persistent under delivery have you identified a buffer of 20% (moved forward from later in the plan period)? [Para 47].</p>	<p>The SHLAA and Annual Monitoring Report show that Rochford has a five-year supply of housing land as a result of adopting the RCS. The five-year supply includes a buffer of 5%, as demonstrated in the SHLAA.</p> <p>The SHLAA shows there are sites, currently projected to be delivered in a 5-10 year period, which could be brought forward earlier if required, giving the District a further buffer that equates to over 20%.</p>
	<p>Does this element of housing supply include</p>	<p>The Annual Monitoring Report shows the number of</p>

	windfall sites; if so, to what extent is there 'compelling evidence' to justify their inclusion (48)?	windfall sites for 2010-11. It indicates that, although windfall sites make a contribution to housing delivery, there is no reliable pattern of windfall sites within the District. As such the District's housing trajectory does not make assumptions in respect of future windfall.
<b>Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).</b>	<p><u>Does the plan identify a supply of developable sites or broad locations for: a) years 6-10; b) years 11-15 (47)?</u></p> <p>Does it supply for years 6-10 including windfall sites?; if so, to what extent is there "compelling evidence" to justify their inclusion (48)?</p>	The RCS identifies an 11-15 year supply of land and indicates whether the demand will be acquired from Green Belt release or other sources such as brownfield land. Such supply is based on consideration of specific sites, and does not include estimates on future windfall.
<b>Illustrate the expected rate of housing delivery through a trajectory; and set out a housing implementation strategy describing how a five year supply will be maintained (47).</b>	Is there an up-to-date housing trajectory that illustrates progress with delivering the strategy in the plan (47)?	<p>The RCS shows a housing trajectory covering the course of the plan period. It identifies the objectively assessed housing requirement for the District over the plan period relative to actual completions, existing permissions and existing allocations and appropriate sites. It also identifies the amount of Green Belt release required over the plan period.</p> <p>The Annual Monitoring Report deals with housing trajectories in more detail, covering factors such as the number of units under construction relative to the number of units with planning permission. This data feeds into the policies and strategies of the RCS.</p> <p>As a result of the findings mentioned above the RCS clearly demonstrates a robust and up to date housing</p>



		trajectory that complies with the requirements of the NPPF.
	Is there a housing implementation strategy describing how delivery of a five-year supply of housing will be maintained to meet the housing target (47)?	<p>The RCS states that it will deliver housing to meet the requirements of the RSS. Policy H1 outlines how the Council intends to make effective use of land. Policy H2 shows how the residential envelopes will be extended and phased over the plan period. Appendix H1 outlines the required infrastructure.</p> <p>Although the policies mentioned above create a viable strategy for meeting the District's housing needs, the RCS is not intended to be an inflexible or restrictive document.</p> <p>The RCS provides certainty to developers, encouraging investment in the delivery of dwellings for the District.</p>
	To what extent does the removal of national and regional brownfield targets have an impact on housing land supply?	Paragraph 4.15 of the RCS states that due to the evidence provided by the SHLAA the 60% target of providing for housing on previously development land is unrealistic in this District. The Council will make use of previously developed land where it is appropriate to do so. The rest of the housing demand will be met by extending the residential envelope. Therefore the abolition of the brownfield targets is immaterial.
<b>Set out the authority's approach to housing density to reflect local circumstances (47).</b>	Does the plan include policies on density of development To what extent do these reflect local circumstances?	Policy H1 of the RCS states that the Council will encourage residential intensification within town centre areas where higher density schemes of 75+ dwellings per hectare may be appropriate. These figures, although

		<p>flexible, are in keeping with the findings of the SHLAA which indicates that Rochford District's main urban areas are able to accommodate a small amount of infill within their existing urban envelopes.</p> <p>Policy CP1 of the RCS includes the requirement for developers of large residential schemes to produce and adhere to design briefs, which reflect the local characteristics and distinctiveness of the development area.</p>
<p><b>Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50) and caters for housing demand and the scale of housing supply to meet this demand (para 159)</b></p>	<p>To what extent have you planned for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as families with children, the elderly and people with disabilities?)</p> <p>To what extent have you identified the size, type, tenure and range of housing required in particular locations, reflecting local demand (50)?</p>	<p>The RCS identifies that the District's housing stock is dominated by larger houses at the higher end of the market. The RCS requires a variety of dwellings to be included in future developments as set out in Policy H5. This is particularly evident in the need for three-bedroom properties for families.</p> <p>The SHMA also identifies the need for a mix of types of housing. It identifies a distinct need for varying forms of affordable housing, social rented housing and intermediate housing. It suggests an 80:20 split between social rented and intermediate accommodation.</p> <p>Due to the constantly evolving housing situation in the District and the likelihood of significant changes to the District's housing statistics over the plan period the RCS also points out that it is necessary to keep the District's housing need under review.</p> <p>The RCS also cites a demand for lifetime homes for the elderly as well as homes to accommodate hidden</p>

		households (young people looking to move out of their parents' homes) and disabled access. This goal is fully compliant with the requirements of the NPPF that LPAs should address 'the need for all types of housing, including affordable housing and the needs of different groups in the community'.
	Does the plan include policies requiring affordable housing? Do these need to be reviewed in the light of removal of the national minimum threshold? Is your evidence for housing provision based on up to date, objectively assessed needs (50)?	The RCS sets a target for 35% affordable housing in all residential developments of 15 or more units, or on sites greater than 0.5 hectares. Policy H4 - Affordable Housing includes the caveat that the Council will monitor the 35% affordable housing target and may reduce this in future depending on the prevailing conditions. This policy is based on evidence obtained from the Annual Monitoring Report showing that the delivery of affordable housing has been historically poor across the whole of the Thames Gateway South Essex Sub Region with Rochford District having a particularly poor record. By addressing these shortfalls the RCS complies with the requirements set out in the NPPF. The approach adopted within this policy is also supported by the Affordable Housing Viability Report.
	Do these require on-site provision or if off-site provision or financial contributions are sought, to what extent can these be robustly justified and to what extent do they contribute to the objective of creating mixed and balanced communities (50)?	The RCS gives a clear preference to on-site affordable housing provision, but allows for off-site provision in rare cases having regard to the particular circumstances of a development.
<b>In rural areas be responsive to local</b>	Have you considered whether your plan needs a policy which allows some market	Within each of the general locations identified in Policy H2 and H3, 35% of the dwellings are expected to be

<p><b>circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54).</b></p>	<p>housing to facilitate the provision of significant additional affordable housing to meet local needs?</p>	<p>affordable, unless it can be demonstrated that the scheme would be undeliverable as per Policy H7. In this case, the percentage of affordable housing to accompany market housing within a development will be subject to a viability assessment.</p>
	<p>Have you considered the case for setting out policies to resist inappropriate development of residential gardens? (This is discretionary)(para 53)</p>	<p>Policy H1 of the RCS addresses the need to avoid inappropriate residential infill within the District, including resisting inappropriate development of residential gardens.</p>
<p><b>In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.</b></p>	<p>Examples of special circumstances to allow new isolated homes listed at para 55 (note, previous requirement about requiring economic use first has gone).</p>	<p>The RCS encourages development where it is most sustainable and will be well integrated into the existing infrastructure unless there are no other available options.</p> <p>Policy GB2 encourages appropriate forms of rural diversification within the Green Belt. Residential development within the Green Belt will be further considered in the Development Management Development Plan Document.</p>
<p><b>Develop robust and comprehensive policies that set out the quality of development that will be expected for the</b></p>	<p>Does the plan include a policy or policies that reflect this objective? To what extent do design policies encompass the principles at paragraph 58 of the NPPF?</p>	<p>The RCS bases its design requirements on the guidance set out in the Essex Design Guide as well as Urban Place Supplement. The RCS avoids being overly prescriptive in its approach to what it considers to be good design.</p>

<p>area.</p>		<p>Good design is ensured by the requirement in Policy CP1 of the RCS that developers of large residential schemes should be required to produce design briefs and adhere to them.</p> <p>Listed Buildings, Scheduled Ancient Monuments and buildings in Conservation Areas also receive an additional measure of protection.</p>
<p><b>Policies should aim to design places which: promote community interaction, including through mixed-use development; are safe and accessible environments; and are accessible developments (69).</b></p>	<p>Does the plan include a policy or policies on inclusive communities? To what extent do these promote opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments which bring together those who work, live and play in the vicinity; safe and accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion; and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas (69)?</p>	<p>The RCS promotes mixed-communities, and the development of residential areas that incorporate public spaces where residents can interact. Policies H2, H3, H5 and Appendix 1 together require residential developments to incorporate a range of housing types, alongside community facilities, public open space and play space.</p>
<p><b>Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).</b></p>	<p>Does the plan include a policy or policies addressing community facilities and local services?</p>	<p>There are already a number of community facilities and local/neighbourhood services/facilities in the District, and the RCS aims to build upon this. Policy CLT6 and Appendix H1 set out a strategy to provide new community and leisure facilities for the District where there is a need.</p>

		<p>Policy CLT5 indicates that the District already benefits from a large amount of public open space in the form of parks, allotments and playing pitches. Although it is worth noting that the distribution of these sites across the district is not uniform as identified in the Open Space Study. As such the RCS requires that new public open space accompany additional residential development. This will ensure that new residents have access to areas where they can socialise and exercise safely.</p> <p>The RCS includes a strategic aim for enhancing the District's play space. It draws on the 2007-2012 Play Strategy which sets out the approach in detail. The policy gives particular weight to providing play spaces that are safe and capable of supporting 'self directed' activities.</p>
<p><b>Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally derived standards to provide these (73).</b></p>	<p>To what extent do policies plan positively for the provision and integration of community facilities and other local services to enhance the sustainability of communities and residential environments; safeguard against the unnecessary loss of valued facilities and services; ensure that established shops, facilities and services are able to develop and modernize; and ensure that housing is developed in suitable locations which offer a range of community facilities and good access to key services and infrastructure?</p>	<p>Due to the strategic nature of the RCS the document does not lay out specific programmes aimed at increasing the provision of community facilities in the District, but identifies where additional facilities are required to accompany residential development. The exact facilities provided will be determined at the planning application stage.</p> <p>Although the NPPF seeks to reduce the level of Planning Obligations and Standard Charges that LPAs impose upon developers it will still be necessary to impose them in many cases in order to ensure that essential infrastructure and facilities are provided.</p> <p>A document covering Planning Obligations and Standard</p>

		<p>Charges will be produced separately from the RCS. It will detail what infrastructure is needed and at what cost. The document will ensure that any requirements that are set out will not render the development unviable.</p> <p>Paragraph 4.8 of the RCS lists the main factors determining the location of future housing including the availability of suitable infrastructure or the opportunities for providing it. It also points out that strategically, new settlements should be well integrated with the District's transport network and with existing community facilities which is in line with the NPPF.</p>
	<p>To what extent do policies identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area (74)? Does the plan include locally derived standards for provision of open space, sports and recreational facilities? To what extent do policies protect and enhance rights of way and access (75)?</p>	<p>Policy CLT5 requires that new open space is required to accompany additional residential developments having regard to local current and projected future need. The RCS proposes to protect key open spaces and recreational facilities such as allotments, parks and playing pitches. This strategy is expanded on in the Council's Open Spaces Study which looks in detail at the distribution of open space and sports and recreational facilities.</p> <p>Policy T7 establishes the Council's intention to support a network of Greenways, which will connect the District's settlements, homes and workplaces through a network of bridleways, cycle routes and pedestrian routes.</p>
<p><b>Enable local communities, through local and neighbourhood plans,</b></p>	<p>Do you have a policy which would enable the protection of Local Green Spaces and manage any development within it in a manner consistent with policy for Green</p>	<p>Rochford District is predominantly Green Belt, so is unlikely to have areas that need to be designated as Local Green Spaces in addition to their Green Belt designation. The RCS includes policies to protect the</p>

<p><b>to identify special protection green areas of particular importance to them – ‘Local Green Space’ (76-78).</b></p>	<p>Belts? (Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period. The designation should only be used when it accords with the criteria in para 77).</p>	<p>Green Belt from inappropriate development.</p>
<p><b>The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances (82)</b></p> <p><b>Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy (83).</b></p> <p><b>Boundaries should be set using ‘physical features likely to be permanent’ amongst other things (85)</b></p>	<p>If you are including Green Belt policies in your plan, do they accurately reflect the NPPF policy? For example:</p> <p>LPA should plan positively to enhance the beneficial use of the Green Belt. Beneficial uses are listed in para 81. PPG2 set out that ‘Green Belts have a positive role to play in fulfilling objectives. Para 1.6 of PPG2 set out the objectives – some of these have been rephrased/ amended and ‘to retain land in agricultural, forestry and related uses’ has been omitted.</p>	<p>The RCS supports strongly the strategic goal of enhancing the beneficial use of the Green Belt for both appropriate forms of employment and recreation. Policy GB2 looks at suitable ways to expand the economic value of the Green Belt, including measures such as the conversion of buildings to bed and breakfasts and small scale hotels. It also encourages the use of the Green Belt for outdoor recreational activities.</p> <p>Paragraph 89 of the NPPF states that some forms of development are not inappropriate in the Green Belt. This includes ‘provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it.’</p> <p>Whilst the NPPF does not specifically state that playing pitches and playing fields are not inappropriate development in the Green Belt, it does clearly state that the facilities needed to support such sites are appropriate. Therefore it stands to reason that outdoor sport and recreation pitches and fields would be acceptable so long as they were designed in a manner that did not undermine the openness, character and role</p>



		of the Green Belt.
	Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development (85).	The RCS is supported by Sustainability Appraisal, which identifies that the strategy proposed supports sustainable development.
	Does it allow for the extension or alteration of a building, provided that it does not result in disproportionate additions over and above the size of the original building? (89). PPG2 previously referred to dwelling. Original building is defined in the Glossary.	<p>The extension and alteration of some buildings within the Green Belt is also permitted by the RCS. This includes the alteration of buildings for use as small hotels and bed and breakfasts as well as agricultural uses.</p> <p>The policy covering the size of extension permitted is located in the emerging Development Management Development Plan Document. Draft Policy DM16 of the emerging Development Management DPD sets out the requirements that no dwelling in the Green Belt can be extended beyond 25% of its original floorspace. Furthermore no material increase in the overall height of the dwelling would be permitted.</p> <p>There have recently been changes to permitted development rights for extensions to dwellings. This needs to be taken into account in the review of the RCS.</p>
	Does it allow for the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces? (89) PPG2 did not have a separate bullet point – replacement related to dwellings rather than buildings.	The emerging Development Management DPD covers the policy on the replacement of existing dwellings in the Green Belt. Developments will be considered if they do not involve increasing the floorspace of the original dwelling by more than 25% and if the visual mass of the new building is no greater than that of the existing dwelling.

		Draft Policy DM10 of the emerging Development Management DPD sets out the policy towards the extension of existing businesses in the Green Belt. The policy complies with the requirements of the NPPF in that it allows for the replacement of buildings provided that they are not materially larger than the ones they replace.
	Does it allow for limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land) whether redundant or in continuing use (excluding temporary buildings), which 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? (89) (PPG2 referred to 'major existing developed sites')	<p>The RCS identifies appropriate, sustainable locations for development. This includes some land that is currently allocated as Green Belt.</p> <p>The RCS includes policies that protect the character and openness of the Green Belt, whilst at the same time supporting appropriate development.</p> <p>The detailed policies in respect of development in the Green Belt are included in the Development Management DPD.</p>
	Change from 'Park and Ride' in PPG2 to local transport infrastructure and the inclusion of 'development brought forward under a Community Right to Build Order' in relation to other forms of development that are not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. (90).	<p>The change from 'Park and Ride' to local transport infrastructure has no impact on the RCS.</p> <p>The RCS does not prevent development being brought forward under the Community Right To Build.</p>
<b>Adopt proactive strategies to mitigate</b>	Have you planned new development in	The RCS seeks to encourage new development within close proximity to existing major transport infrastructure

<p><b>and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations (94).</b></p>	<p>locations and ways which reduce greenhouse gas emissions?</p>	<p>and enhancements to public transport will reduce reliance on the private car. Close proximity to shops and services also reduce this need. New developments outside of the existing residential areas will be required to include public transport infrastructure. Furthermore the RCS supports projects such as the Greenways projects which will allow travel patterns within the District to become less dependant on private car ownership.</p> <p>The RCS was subject to Sustainability Appraisal, which considered the impact of policies on <i>inter alia</i> climate change.</p>
	<p>Does your plan actively support energy efficiency improvements to existing buildings?</p>	<p>There is no conflict with the NPPF.</p> <p>The RCS is a strategic document. It does not prescribe individual energy efficiency measures for existing homes, nor does it discourage the introduction of such features.</p>
	<p>When setting any local requirement for a building's sustainability, have you done so in a way that is consistent with the Government's zero carbon buildings policy and adopt nationally described standards? (95)</p>	<p>The RCS has robust policies and guidance on both the requirement that the Code For Sustainable Homes should be applied to all new dwellings and that non-residential buildings should comply with BREEAM (Building Research Establishment Environmental Assessment Method) criteria.</p>
<p><b>Help increase the use and supply of renewable and low carbon energy (97)</b></p>	<p>Do you have a positive strategy to promote energy from renewable and low carbon sources?</p> <p>Have you considered identifying suitable areas for renewable and low carbon energy</p>	<p>Policy ENV6 sets out the requirements for any large scale renewables projects. The Council is of a mind to grant any proposals for large scale renewable projects with the caveat that it should not be within or adjacent to any of the environmentally sensitive areas listed and that it does not cause any adverse visual impacts.</p>

	sources, and supporting infrastructure, where this would help secure the development of such sources (see also NPPF footnote 17)?	<p>Policy ENV7 sets out the policy for small scale renewables which the Council will consider more favourably. On site low impact renewable energy generating methods will suit the district better than larger more intrusive projects considering the significant amount of Green Belt coverage in the district. Furthermore small scale on site systems will be easier to incorporate into the existing urban fabric of the District because they can be incorporated without the need to breach established Green Belt Boundaries. This will have the further benefit of requiring very little if any additional infrastructure by comparison to larger centralised options.</p> <p>Policy ENV8 also sets out the requirement that developments of more than 5 dwellings or non-residential developments of 1000 square metres or more should secure at least 10% of their energy from decentralised and renewable or low-carbon sources unless this is not feasible or viable.</p>
	Does it identify where development can draw its energy supply from decentralised, renewable or low carbon supply systems and for co-locating potential heat customers and suppliers (97)?	The RCS does not go into this level of detail because it is a strategic document.
<b>Minimise vulnerability to climate change and manage the risk of flooding (99)</b>	Does the plan allocate, and where necessary re-locate, development away from flood risk areas (100)?	<p>The RCS is supported by a sequential test.</p> <p>Policy ENV3 sets out the policy with regards to development in flood risk zones. The Council will</p>

	Was the location of development informed by flood risk assessment and sequential test?	encourage development away from areas at risk of flooding by applying the sequential test. It shows that most of the District's required development can be accommodated in Flood Zone 1.
<b>Manage risk from coastal change (106)</b>	Does the plan identify where the coast is likely to experience physical changes and identify Coastal Change Management Areas? Is it clear what development will be allowed in such areas?  Does it make provision for development and infrastructure that needs to be re-located from such areas? (106)	The RCS does not specifically refer to areas likely to experience significant coastal change. The RCS does however steer development generally away from such areas through the Coastal Protection Belt policy.
<b>Protect valued landscapes (109)</b>	Does the plan contain a strategy to create, protect, enhance and manage networks of biodiversity and green infrastructure?	The RCS outlines and supports the implementation of several important Greenways (Green Grid).  Policy ENV1 establishes the Council's strategy for protecting and enhancing networks of biodiversity and Green Infrastructure. Special Areas of Conservation, Special Protection Areas, Ramsar Sites, Sites of Special Scientific Interest, Ancient Woodlands, Local Nature Reserves and Local Wildlife Sites will all be protected enhanced and restored. The Crouch and Roach Management Plan is supported by the Council.  The RCS supports a network of Greenways throughout the District, connecting with neighbouring areas. These will work in concert with the Green Grid Strategy which aims to connect the District's communities together. It also aims to regenerate riverside, local attractions and the countryside. It seeks to create high quality green

		spaces and link them to the districts settlements. Greenways form an important part of this strategy. They provide routes for alternative forms of transport as well as being an attraction to the public in their own right.
	Does it minimize the loss of higher quality agricultural land? Does it give great weight to protecting the landscape and scenic beauty of National Parks, the Broads and AONBs?	Policy ENV1 deals with the protection and enhancement of the natural environment.  The RCS seeks to protect the vast majority of greenfield land in the District (the majority of which is Green Belt). Where land is proposed to be reallocated for development, such proposals are supported by Sustainability Appraisal, which considers <i>inter alia</i> impact on land and soils.  There are no National Parks, Broads or AONBs in Rochford District.
<b>Prevent unacceptable risks from pollution and land instability (109)</b>	Does it ensure development is appropriate for its location having regard to the effects of pollution on health, the natural environment or general amenity, taking account of the potential sensitivity of the area or proposed development to adverse effects from pollution?	The RCS Policy ENV5 ensures that public exposure to pollution from new residential areas will be limited by Air Quality Management Areas.  The RCS is supported by Sustainability Appraisal which includes consideration of impact on <i>inter alia</i> health and air quality.
	Are sites suitable for the proposed use taking account of ground conditions, pollution from previous uses and any proposals for land remediation? Does it identify areas of tranquility and protect them from noise? (109)	Policy ENV11 does not restrict development on contaminated land in and of itself, but it ensures that appropriate decontamination of any such land occurs prior to its development.  The RCS does not make specific reference to noise

		pollution per se, but it is supported by Sustainability Appraisal which includes consideration of impact of policies on <i>inter alia</i> noise.
<p><b>Planning policies should minimise impacts on biodiversity and geodiversity (117)</b></p> <p><b>Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117).</b></p>	If you have identified Nature Improvement Areas, have you considered specifying the types of development that may be appropriate in these areas (para 117)?	<p>The Greater Thames Marshes has recently been designated as a Nature Improvement Area (NIA). The NIA extends to the south and east of the River Roach encompassing Sutton, Barling, Great Wakering and Little Wakering, Foulness and Wallasea Island. Funding has been secured for improvements to the NIA. The NIA partnership (<a href="http://greaterthamesmarshes.com/">http://greaterthamesmarshes.com/</a>) has established a Project Steering Group to oversee the main project delivery and monitor and evaluate performance against their objectives.</p> <p>The NIA area encompasses several nature conservation designations, including Special Protection Areas (SPAs), Ramsar sites, Sites of Special Scientific Interest (SSSIs) and Special Areas of Conservation (SACs).</p> <p>Policy ENV1 states that the Council will maintain, restore and enhance sites of international, national and local nature conservation importance. These include SACs, SPAs, Ramsar Sites, SSSIs, Ancient Woodlands, Local Nature Reserves (LNRs) and Local Wildlife Sites (LoWSs). The policy also supports the implementation of the Crouch and Roach Management Plan.</p>
<b>Include a positive strategy the conservation and enjoyment of the</b>	Does the plan identify heritage assets (buildings, monuments, sites, places, areas, landscapes)?	The RCS includes a section on Scheduled Monuments and Conservation Areas which discusses the Districts heritage assets.

<p><b>historic environment, including heritage assets most at risk (126)</b></p>		<p>The RCS also proposes a Local List of buildings of local historical or architectural interest.</p>
	<p>Does it identify heritage assets most at risk?</p> <p>The RCS includes policies to protect heritage assets, but as a strategic document does not identify specific assets that are at risk.</p> <p>Does it promote new development in ways that will make a positive contribution to character and distinctiveness? (126)</p>	<p>Policy CP1 ensures that new developments are assessed against the design criteria in the Essex Design Guide. Furthermore any large scale development must include a design brief which the developer will be required to adhere to.</p>
<p><b>It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142).</b></p>	<p>Does the plan have policies for the selection of sites for future peat extraction? (143) (NPPF removes the requirement to have a criteria based policy as peat extraction is not supported nationally over the longer term).</p> <p>To what extent does the plan take into account the matters raised in relation to paragraph 143 and 145 of the NPPF? This includes matters in relation to land in national / international designations; landbanks; the defining of Minerals Safeguarding Areas; wider matters relating to safeguarding; approaches if non-mineral development is necessary within Minerals Safeguarding Areas; the setting of environmental criteria; development of noise limits; reclamation of</p>	<p>Mineral extraction is a County matter, and as such is not addressed by the RCS.</p>



	<p>land; plan for a steady and adequate supply of aggregates.</p> <p>To what extent have you co-operated with neighbouring and more distant authorities to co-ordinate the planning of industrial minerals to ensure adequate provision is made to support their likely use in industrial and manufacturing processes? (146)</p> <p>In order to facilitate the sustainable use of energy minerals to what extent do your policies take into account the matters raised in paragraph 147 of the NPPF?</p>	
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