

Council's Response to Issues and Questions

Issue 1

Is the overall strategy for the allocation of housing, traveller and employment sites sound having regard to the needs and demands of the District identified in the Core Strategy; the relationship with national policy and Government objectives and the evidence base and preparatory processes?

Questions:

- i) Have the consultation procedures undertaken been adequate and in compliance with the Statement of Community Involvement and the Town and Country Planning (Local Planning) (England) Regulations 2012?

The Allocations Document has been prepared in accordance with the Statement of Community Involvement (SCI), as set out in the Consultation Statement. The Plan has also been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 since they came into force on 6 April 2012, and in particular Regulation 18. Although the SCI was prepared prior to the changes in regulations, the community involvement techniques set out in it are still relevant and have been adopted throughout the preparation of the Plan.

As part of the preparation of the Core Strategy, to which the Allocations is required to conform, the Council undertook public consultation on each of the four stages of the Plan between 2006 and 2009 to encourage people to participate in the plan making process and sign up to the Council's mailing list. The engagement and consultation techniques undertaken at each stage in the preparation of the Core Strategy include:

- 2006 Issues and Options Document – manned public exhibitions at locations throughout the District; workshops at two secondary schools; posters; consultation letters.
- 2007 Preferred Options – manned public exhibitions at locations throughout the District; letters and emails to those on the mailing list; article in Rochford District Matters (the Council's free newsletter, sent to all households in the District).
- 2008 Revised Preferred Options – unmanned public exhibitions across the District; public meetings; school workshops at three secondary schools; issuing leaflets outside of the District's three train stations during rush-hour; press release.
- 2009 Submission Document – letters and emails to those on the mailing list; article in Rochford District Matters; notices and press coverage in local media; posters.

An example of the media coverage and articles in Rochford District Matters are attached for information (see Appendix 1 and 2). More information on the engagement and consultation techniques undertaken for the Core Strategy is contained in the Consultation Statement¹.

The Council directly invited a wide range of specific and general consultation bodies to make representations on both stages of the Allocations. The specific consultees invited

¹ Core Strategy Consultation Statement available from: http://fs-drupal-rochford.s3.amazonaws.com/pdf/planning_cs_consultation_statement.pdf

to comment, as well as the number of representations received, is set out in the Consultation Statement².

The preparation of the Allocations has been in compliance with the Statement of Community Involvement, using a wide range of media to advertise community engagement and consultation events. The Council operates a mailing list for those individuals interested in planning policy and the development of the District, who are informed when such events are planned to take place, and are directly invited (either through email or letter) to comment. The Council also advertises such events on its website, Parish Council notice boards, in local media and within the Council's free newsletter, Rochford District Matters, where appropriate. The Council has sought to use other engagement techniques, including public meetings. Specifically, officers attended public meetings at the following locations, through liaising with all the parish/town Councils:

- Rayleigh – 29 March 2010
- Rawreth – 7 April 2010
- Hullbridge – 12 April 2010
- Hockley – 13 April 2010
- Canewdon – 20 April 2010
- Ashingdon – 19 April 2010

All of the public meetings were well attended by local residents. In addition officers also attended an information day in Hullbridge on 7 April 2010. Information on the Council's proposed plans for the future of the District was available to view, and residents were able to ask officers questions about the proposals, including the residential options for Hullbridge.

An example of the coverage by local media and articles within Rochford District Matters are attached (see Appendix 1 and 2).

The Consultation Statement provides more information on how consultation and community engagement has been undertaken throughout the preparation of the Allocations, and how responses received have been taken into account.

The Council considered each of the representations submitted during each consultation stage and identified the main issues raised by respondents. These issues as well as officers initial responses to these at both stages in the preparation of the Allocations have been included in the Consultation Statement.

The Allocations has been prepared since 2010 taking into consideration consultation responses received at each stage. The Council were also mindful of comments raised during the preparation of the Core Strategy. The Submission Document sought to address issues raised during the 2010 consultation, for example flood risk issues through stating in the Concept Statements that only open space would be permitted within areas at risk of flooding, and for Hullbridge in particular where surface water

² Allocations Consultation Statement available from:
http://www.rochford.gov.uk/sites/rochford.gov.uk/files/documents/files/planning_allocations_consultation.pdf

flooding is recognised as an existing issue, that this would need to be addressed. As a further example, additional sites submitted during the 2010 consultation on the Allocations were assessed in further detail alongside the sites included within the Discussion and Consultation Document. Comments raised during the submission consultation have also been taken into account – the Schedule of Changes (Appendix 8 of the Consultation Statement) sets out changes proposed to the Allocations prior to submission. These changes have been encompassed within the Allocations Submission Document (April 2013).

- ii) Are the policies in an appropriate form or are they unduly prescriptive?

The policies have been drafted in such a way as to provide a balance between ensuring flexibility of supply and protection of the District's characteristics.

Although the policies include reference to relevant Core Strategy requirements, it is believed that the inclusion of this wording does assist the interpretation and understanding of the Concept Statements.

- iii) Would a 5 year housing land supply be achieved having regard to paragraph 47 of the National Planning Policy Framework?

In accordance with policy at the time, the Core Strategy conforms to the housing targets set out in the 2008 East of England Plan which are considered to encompass the objectively assessed needs for the East of England region. Whilst it is noted that the East of England Plan has been revoked, the Core Strategy is the adopted development plan document that sets out the objectively assessed needs of the District. The Core Strategy identifies nine developable general locations for residential development over the plan period. The Allocations, in accordance with the adopted Core Strategy, identifies deliverable and developable sites within these general locations to ensure the delivery of housing during the plan period.

Although the Rochford Core Strategy predates the latest national guidance – the National Planning Policy Framework or NPPF – an NPPF compliance review of the Rochford Core Strategy has been undertaken that concludes that the Rochford Core Strategy is broadly in compliance with the NPPF. The compliance review, however, noted that whilst the Rochford Core Strategy was produced accounting for evidence that was in place at the time, it should be acknowledged that new evidence is constantly emerging.

During the Core Strategy examination, in July 2011, the draft NPPF was published. The Inspector conducting the examination invited participants to comment on the implications of the draft on the Core Strategy, before finding the Plan to be legally compliant and sound (subject to minor modifications). As such, the draft NPPF and the general thrust of emerging policy were considered during the examination of the Core Strategy.

The housing trajectory, which combines the projected delivery of market and affordable housing, is set out annually in the Annual Monitoring Report (AMR). The AMR is based on the detailed assessments within the Strategic Housing Land Availability Assessment

(SHLAA) and the latest AMR (2011-12) shows that there is a five-year housing land supply. There is inbuilt flexibility within this housing land supply (as set out in Core Strategy Policy H2 and H3) to bring sites identified later in the plan period forward to meet any shortfall in supply that may occur. If required, this would equate to a greater than 20% buffer in terms of housing land supply.

Historically windfall sites have formed much of the District's housing land supply, and in accordance with national policy these have not been accounted for and do not form part of the housing trajectory. As such, any windfall sites coming forward during the plan period would contribute to supply, which will be monitored within the AMR.

In addition, Policies SER1-SER9 include a 5% flexibility allowance, provided that it can be demonstrated that the additional number of dwellings would be required to maintain a five-year land supply, and compensate for a shortfall of dwellings that had been projected to be delivered within the location identified in the adopted Core Strategy.

iv) Do the proposed allocations allow for sufficient flexibility?

There is inbuilt flexibility in both the adopted Core Strategy and Allocations to facilitate fluidity in the District's housing land supply. As set out in Policies H2 and H3 of the Core Strategy, the Council will monitor housing supply and maintain a flexible approach in terms of releasing land for residential development to ensure that there is a constant five-year supply of land for housing. This includes land later on in the plan period being brought forward to meet a demonstrable need if required.

Continuing this thread, the Allocations Document sets out in Policies SER1-9 the criteria that would need to be met, namely that it can be demonstrated that:

- The additional number of dwellings are required to maintain a five-year land supply; and
- The additional number of dwellings to be provided on the site is required to compensate for a shortfall of dwellings that had been projected to be delivered within the location identified in the adopted Core Strategy.

Land identified post-2021 (SER6b, SER8, SER9a and SER9b) is proposed to be safeguarded until it is required for development.

v) How would the supply of sites be monitored and managed?

The Council will monitor housing supply through the Annual Monitoring Report. Officers will monitor the housing trajectory, which will indicate whether a greater housing land supply is required or not.

Indicators set out within the Allocations Submission Document Sustainability Appraisal (April 2013) will also be included within the Annual Monitoring Report.

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- vi) Is the 5% 'cap' on additional housing justified and would removing it discourage brownfield and windfall sites from coming forward?

This would provide a balance between ensuring flexibility of supply and protection of the District's characteristics. Permitting additional Green Belt to be released in addition to that already proposed would discourage more sustainable brownfield sites being brought forward for development.

- vii) Are there alternative sites that would have avoided the loss of Green Belt land?

No. The Core Strategy has already established that the release of a small amount of Green Belt is necessary to meet housing and employment needs of the District during the plan period. The Core Strategy has been through an independent examination and was found sound, and is an adopted part of the development plan.

The 2009 SHLAA and the 2012 Review have identified appropriate brownfield sites within the existing development boundary and assessed their suitability, viability and deliverability. These documents have concluded, and as justified within the adopted Core Strategy, that the reallocation of a small amount of Green Belt land is required to meet need.

Each of the reasonable alternative site options considered during the preparation of the Allocations would necessitate the loss of some Green Belt land, including those that are previously developed.

- viii) Have there been any material changes in circumstances since the adoption of the Core Strategy?

Since the adoption of the Core Strategy in December 2011, the National Planning Policy Framework (NPPF) has come into force – the NPPF was published on 27 March 2012. However, in conducting the examination for the Core Strategy, the Inspector considered the draft NPPF and the general thrust of emerging national policy.

The East of England Plan, which is the regional plan for the East of England, was revoked on 3 January 2013. However, this has not been replaced by policy at a higher level.

At a local level, since the adoption of the Core Strategy the 2012 SHLAA Review has been published, which reaffirms the need to reallocate some Green Belt land for housing, as per the Core Strategy.

In addition, several planning applications have been submitted to the Council. Outline planning applications have been granted consent in the general locations of West Rochford (Reference: 10/00234/OUT) and West Hockley (Reference: 12/00283/OUT). Full planning applications have also been granted consent and development is underway in the general locations of South Hawkwell (Reference: 12/00381/FUL) and East Ashingdon (Reference: 11/00315/OUT and 12/00398/REM).

- ix) Has the overall impact on highway capacity across the District been adequately addressed?

The Core Strategy sets out the housing numbers and general locations for development, which have already been examined and found sound. The overall impact on highway capacity has been adequately addressed.

The Council considered the potential impact throughout the preparation of the Core Strategy and as part of the examination process, provided adequate evidence that this has been addressed. A number of meetings have taken place between Essex County Council Highways and the Council throughout the preparation of the Core Strategy^{3,4}, which discussed the potential impact of the emerging general locations on the local highway network in particular.

The Council has also closely liaised with Essex County Council Highways in the preparation of the Allocations and the finalisation of the preferred sites. The Council have a close working relationship with Essex County Council with regard to emerging issues, and the Council met with representatives from the Highway Authority to discuss the potential site options and impact on the highway network. Notes from these meetings form part of the evidence base (79.EB30 and 80.EB31). Essex County Council Highways are happy with the overall impact of development across the District.

Furthermore, it should be noted that this issue was previously considered in the examination of the adopted Core Strategy, to which the Allocations Document conforms. It is important to remember that this examination is focussed on the detailed allocation of land for development, the quantum and location for which have already been determined, examined, found to be sound and form part of the adopted development plan.

Issue 2

Are the allocated housing and employment sites listed below (both brownfield and settlement extensions) justified, deliverable within the plan period and consistent with national policy?

Great Wakering

BFR1 Star Lane Industrial Estate, Great Wakering
SER9 West Great Wakering
NEL3 South of Great Wakering

Rayleigh

BFR4 Rawreth Industrial Estate, Rayleigh
SER1 North of London Road, Rayleigh
NEL1 South of London Road, Rayleigh
NEL2 West of A1245, Rayleigh

³ 'Record of Correspondence between RDC and ECC vis-à-vis Transport Infrastructure and the Rochford District Core Strategy' available from: http://fs-drupal-rochford.s3.amazonaws.com/pdf/corestrat_add_corr.pdf

⁴ 'Rochford District Core Strategy Approach to Transport within Local Development Framework by Rochford District Council and Essex County Council' available from: http://fs-drupal-rochford.s3.amazonaws.com/pdf/corestrat_add_appr.pdf

Hullbridge

SER6 South West Hullbridge

Canewdon

SER7 South Canewdon

Others

BFR2 Eldon Way/Foundry Industrial Estate, Hockley

BFR3 Stambridge Mills, Rochford

SER2 West Rochford

SER4 South Hawkwell

SER8 South East Ashingdon

Questions (for all sites/locations):

- i) Is the site selected justified when compared to other reasonable alternatives?
- ii) Is the proposed development deliverable over the plan period having regard, amongst other things, to land ownership issues and infrastructure constraints?
- iii) Are the detailed site boundaries appropriate?
- iv) Is the detail about the form, scale, access and quantum of development appropriate having regard to policies in the Core Strategy?
- v) Are the requirements for public open space and play space justified for brownfield sites given the likely development costs?
- vi) If any of the specific sites/locations are found to be unsound, then what are the alternative options?

Great Wakering

BFR1 Star Lane Industrial Estate, Great Wakering

- i) This site has been specifically identified in the Core Strategy to be reallocated for appropriate alternative uses, including residential (Policy H1 and ED3).
- ii) A viability study has been prepared for this industrial estate (see Appendix 3) which suggests that the viability of delivering the northern section of the site (which is currently in use for employment) is likely to be challenging in the short term under current market conditions. Although it recommends that this site should not be included within the Council's five-year housing land supply, the Council considers this site to be appropriate and developable in the longer term.
- iii) The site follows the existing boundary of the entire industrial estate as currently allocated.
- iv) Although the policy includes reference to relevant Core Strategy requirements, it is believed that the inclusion of this wording does assist the interpretation and understanding of the Concept Statements.
- v) The Core Strategy and Open Space Study provide justification for these requirements.
- vi) This site has been specifically identified in the Core Strategy. The majority of the site does not form part of the Council's five-year housing land supply as identified in the

latest housing trajectory (Annual Monitoring Report 2011-12). Greenfield sites identified later on in the plan period (post-2021) have the potential to be brought forward to meet any shortfall that may arise if required.

SER9 West Great Wakering

- i) The general location of West Great Wakering has been identified in principle for development within the Core Strategy. The sites identified within this general location have been assessed in detail against the reasonable alternatives both within the Sustainability Appraisal (April 2013) – see tables pages 58-59 – and the Detailed Assessment of Potential Residential Site Options (75.EB26).
- ii) These sites are planned to come forward post-2021, unless they are required to come forward to ensure a five-year housing land supply. These sites are being promoted for development and have been assessed within the Strategic Housing Land Availability Assessment (SHLAA).
- iii) The Sustainability Appraisal has considered each proposed land allocation, and the sites identified would meet the dwelling and infrastructure requirements for this general location.
- iv) Although the policy includes reference to relevant Core Strategy requirements, it is believed that the inclusion of this wording does assist the interpretation and understanding of the Concept Statements.
- v) N/A
- vi) This general location for development has been identified in principle within the Core Strategy. The reasonable alternatives have been assessed within the Sustainability Appraisal and the proposed sites are considered to be the most sustainable.

NEL3 South of Great Wakering

- i) The general location of South Great Wakering has been identified in principle for development within the Core Strategy. This site has been assessed in detail against the reasonable alternatives both within the Sustainability Appraisal (April 2013) – see table pages 63-64 – and Detailed Assessment of Potential Employment Site Options (73.EB24) and Detailed Assessment of Potential Additional Employment Site Options (74.EB25).
- ii) The land in question has been promoted for development. It should be noted that this site is not required to come forward in the immediate future.
- iii) The proposed location of the site is considered to be appropriate, and a sufficient distance from the proposed development on Star Lane Industrial Estate and the Star Lane Pits Local Wildlife Site. However, it would be less likely to promote coalescence with Shoebury to the south than other options considered.

This site has been assessed in detail against the reasonable alternative options both within the Sustainability Appraisal and the detailed assessments. The Sustainability Appraisal (April 2013), for example notes that:

“The detachment of the site and the fact that it does not follow natural boundaries along its northern, southern and eastern boundaries impacts on the defensibility of the Green Belt boundary, which would have negative sustainability implications. However, the separation of the site would ensure residential amenity for the neighbouring proposed residential development (Policy BFR1) and would have a positive effect through minimising the impact on the Local Wildlife Site.

A substantial green buffer to the north, east and south would positively impact on the defensibility of the Green Belt boundary, residential amenity and the nearby Local Wildlife Site.” (page 64).

- iv) Although the policy includes reference to relevant Core Strategy requirements, it is believed that the inclusion of this wording does assist the interpretation and understanding of the Concept Statements.
- v) N/A
- vi) This site is considered to be the most sustainable option against the reasonable alternatives. Alternative options have been considered, for example closer to the proposed residential development to the north (Star Lane Brickworks), but would, on the whole, not be as sustainable.

Rayleigh

BFR4 Rawreth Industrial Estate, Rayleigh

- i) This site has been specifically identified in the Core Strategy to be reallocated for appropriate alternative uses, including residential (Policy H1 and ED3).
- ii) A viability study has been prepared for this industrial estate (see Appendix 3) which found that this site could be viably delivered under current market conditions, if less than 35% of dwellings delivered on the site are affordable. It should be noted that whilst Core Strategy Policy H4 requires that at least 35% of dwellings delivered are affordable, this requirement may be relaxed where it can be demonstrated that this requirement would render the proposed development economically unviable. The study also recommends that this site should not be included within the Council's five-year housing land supply. The latest Annual Monitoring Report (2011-12) includes the site later on in the plan period. Having regard to all of the above, the Council consider this site to be appropriate and developable in the longer term.
- iii) The site follows the existing southern, eastern and western boundaries of the industrial estate as currently allocated (with the exception of the Makro site to the north).
- iv) Although the policy includes reference to relevant Core Strategy requirements, it is believed that the inclusion of this wording does assist the interpretation and understanding of the Concept Statements.

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- v) The Core Strategy and Open Space Study provide justification for these requirements.
- vi) This site has been specifically identified in the Core Strategy. It does not form part of the Council's five-year housing land supply as identified in the latest housing trajectory (Annual Monitoring Report 2011-12). Greenfield sites identified later on in the plan period (post-2021) have the potential to be brought forward to meet any shortfall that may arise if required.

SER1 North of London Road, Rayleigh

- i) The general location to the North of London Road, Rayleigh has been identified in principle for development within the Core Strategy. The site identified within this general location has been assessed in detail against the reasonable alternatives both within the Sustainability Appraisal (April 2013) – see table page 48 – and Detailed Assessment of Potential Residential Site Options (75.EB26).
- ii) This site is expected to be delivered between 2015 and 2021. It is being promoted for development and has been assessed within the Strategic Housing Land Availability Assessment (SHLAA). The infrastructure required for this general location can be delivered as part of the development of the site as set out in the Statement of Common Ground between the Council and Countryside Properties (see Appendix 4).
- iii) The western boundary of the site is proposed to be amended 30m distance to the east of the pylons as set out in response to the Inspector's initial questions June 2013, and included within the aforementioned Statement of Common Ground (see Appendix 4). A statement from the Council's Principal Environmental Health Officer has also been attached (see Appendix 5).
- iv) Although the policy includes reference to relevant Core Strategy requirements, it is believed that the inclusion of this wording does assist the interpretation and understanding of the Concept Statements.
- v) N/A
- vi) This general location for development has been identified in principle within the Core Strategy. The reasonable alternatives have been assessed within the Sustainability Appraisal and the proposed site is considered to be the most sustainable.

NEL1 South of London Road, Rayleigh

- i) The general location to the South of London Road, Rayleigh has been identified in principle for additional employment development within the Core Strategy. This site has been assessed in detail against the reasonable alternatives both within the Sustainability Appraisal (April 2013) – see table pages 62-63 – and Detailed Assessment of Potential Employment Site Options (73.EB24) and Detailed Assessment of Potential Additional Employment Site Options (74.EB25).
- ii) Part of the site is already in use for employment, although not allocated as such. A projected growth in employment land has been identified in the Employment Land

Study, however, the proposed site at NEL2 would accommodate the majority of uses displaced from Rawreth Industrial Estate. This site is proposed to accommodate an additional 2.2 hectares of office space, if it cannot be accommodated within Rayleigh and Hockley town centres (to be delivered through the Area Action Plans) as required by the Core Strategy. As such, this is a long term allocation to ensure that there is an appropriate level of office space available within the District in future, if required.

- iii) The general location to the South of London Road, Rayleigh has been identified in principle for development within the Core Strategy. A range of potential options for additional employment land to the south of London Road, Rayleigh have been considered and assessed throughout the preparation of the Allocations both within the Sustainability Appraisal (April 2013) – see table pages 62-63 – and Detailed Assessment of Potential Employment Site Options (73.EB24) and Detailed Assessment of Potential Additional Employment Site Options (74.EB25).

The Sustainability Appraisal (April 2013) suggested that given the range of uses on Rawreth Industrial Estate, it would be appropriate to allocate two sites to compensate for the reallocation of this site to residential. Based on the additional land requirements for office space, and types of uses on the industrial estate, it was determined that land to the south of London Road, Rayleigh could accommodate the light industrial and office uses (see 74.EB25 – page 43).

This site has been assessed in detail against the reasonable alternative options both within the Sustainability Appraisal and the detailed assessment. For example, the Sustainability Appraisal (April 2013) notes that:

“The site does not follow natural boundaries along its western and southern boundaries, which would have negative sustainability implications in terms of the defensibility of the Green Belt boundary in this location. However, the Concept Statement proposes the creation of sizeable green buffers in the Green Belt to the west and south of the site to enhance this defensibility.” (page 63).

- iv) The allocation of land in this location is in accordance with the Core Strategy, particularly the proposed allocation of an additional 2.2 hectares of land for office use, should this be required in the future.
- v) N/A
- vi) The general location to the South of London Road, Rayleigh has been identified in principle for development within the Core Strategy (Policy ED4).

NEL2 West of A1245, Rayleigh

- i) This site has been assessed in detail against the reasonable alternatives both within the Sustainability Appraisal (April 2013) – see table pages 62-63 – and Detailed Assessment of Potential Employment Site Options (73.EB24) and Detailed Assessment of Potential Additional Employment Site Options (74.EB25).

In particular, the initial Sustainability Appraisal (July 2012) recommended that it would be appropriate to allocate two sites for employment land to the west of Rayleigh (primarily given the different types of uses proposed; office and light industrial, and heavier industrial activities).

The detailed assessments considered the potential impact of the site, and the reasonable alternative options, in detail particularly in terms of sustainability implications, Green Belt impact and visual impact. The Sustainability Appraisal (April 2013) found that the site generally performed well against the sustainability objectives.

- ii) This site is being actively promoted for development by the landowner. It is a 'unique' Green Belt site in that it is degraded countryside (further detail is provided within 73.EB24 – see page 23 onwards). In addition, it should be noted that a court order has been made against the land owner of GT1, as well as NEL2, to clear remove all hazardous waste, vehicles, plant and machinery, as well as all other waste, from the site (see Appendix 6).

Although Essex County Council Highways have objected to the allocation of NEL2 on highway grounds, a report has been prepared by Arup on behalf of the landowner (see Appendix 7), which recommends that a safer and higher standard of access and egress for the site could be provided to serve the proposed development.

- iii) This is an enclosed site with a train line to the north, existing boundaries to the west and south, and roads to the south east and west. A Gypsy and Traveller site is proposed to be located to the south west of the site. This site has been assessed in detail against the reasonable alternative options both within the Sustainability Appraisal and the detailed assessments. In particular, the Sustainability Appraisal (April 2013) notes that:

“It is located on an area of degraded countryside. The site also has the potential to create a defensible Green Belt boundary and may preserve the character and openness of Green Belt in other locations.” (page 63).

- iv) In terms of access to serve the proposed quantum of development, this site is well related to the A1245, A130 and A127.

Although Essex County Council Highways have objected to the allocation of NEL2 on highway grounds, a report has been prepared by Arup on behalf of the landowner (see Appendix 7), which recommends that a safer and higher standard of access and egress for the site could be provided to serve the proposed development.

- v) N/A

- vi) The reasonable alternatives to this site have been assessed within the Sustainability Appraisal and the proposed site is considered to be the most sustainable for the uses proposed.

Hullbridge

SER6 South West Hullbridge

- i) The general location of South West Hullbridge has been identified in principle for development within the Core Strategy. The site identified within this general location has been assessed in detail against the reasonable alternatives both within the Sustainability Appraisal (April 2013) – see tables pages 54-55 – and Detailed Assessment of Potential Residential Site Options (75.EB26).
- ii) The site is being actively promoted for development, is expected to be delivered in two phases; 2015-2021 and post 2021 and has been assessed within the Strategic Housing Land Availability Assessment (SHLAA). The infrastructure required for this general location can be delivered as part of the development of the site as set out in the Statement of Common Ground between the Council and Phase 2 Planning (see Appendix 8).
- iii) This site has been assessed in detail against the reasonable alternative options both within the Sustainability Appraisal and within the detailed assessments. For example, the Sustainability Appraisal (April 2013) noted that:

“Policy SER6 performs well against the sustainability criteria. In particular it ensures good access to local shops and services as it is located within the general pedestrian zone of Hullbridge. The site follows the existing boundaries of Hullbridge, ensuring that there is a minimum amount of extension into the Green Belt.” (page 55).
- iv) Although the policy includes reference to relevant Core Strategy requirements, it is felt that the inclusion of this wording does assist the interpretation and understanding of the Concept Statements.
- v) N/A
- vi) This general location for development has been identified in principle within the Core Strategy. The reasonable alternatives have been assessed within the Sustainability Appraisal and the proposed site is considered to be the most sustainable.

Canewdon

SER7 South Canewdon

- i) The general location of South Canewdon has been identified in principle for development within the Core Strategy. The site identified within this general location has been assessed in detail against the reasonable alternatives both within the Sustainability Appraisal (April 2013) – see tables pages 56-57 – and Detailed Assessment of Potential Residential Site Options (75.EB26).

The Council has also sought additional advice from Essex County Council's historic buildings advisor. The Council's historic buildings advisor did not raise specific concerns in relation to the proposed siting of SER7 during the consultation, and as set out in the attached statement, it is not considered that the proposed site would, if

appropriately designed, have a detrimental impact on the Listed Buildings or adjacent Conservation Area (see Appendix 9).

- ii) The site is expected to be delivered between 2015 and 2021, and is being actively promoted.
- iii) This site has been assessed in detail against the reasonable alternative options, both within the Sustainability Appraisal and within the detailed assessments. For example, the Sustainability Appraisal (April 2013) noted that:

“The proposed site for Policy SER7 performs well against the sustainability criteria. It is well related to the existing settlement of Canewdon following the natural boundaries along the approach to St Nicholas Church and not projecting northward of the existing development to the west of the site to the north of Lark Hill Road.” (page 57).

- iv) Although the policy includes reference to relevant Core Strategy requirements, it is believed that the inclusion of this wording does assist the interpretation and understanding of the Concept Statements.
- v) N/A
- vi) This general location for development has been identified in principle within the Core Strategy. The reasonable alternatives have been assessed within the Sustainability Appraisal and the proposed site is considered to be the most sustainable.

Others

BFR2 Eldon Way/Foundry Industrial Estate, Hockley

- i) This site has been identified in the Core Strategy to be reallocated for mixed use including residential, retail and employment. The precise details for the future development of this site and the wider centre of Hockley are set out in the emerging Hockley Area Action Plan (HAAP).
- ii) The Allocations only proposes that this site is de-allocated for employment use. Viability has been considered during the preparation of the HAAP (81.EB32, 82.EB33 and 85.EB36).
- iii) Policy BFR2 identifies the existing industrial estate which will no longer be allocated solely for employment.
- iv) N/A. The policy seeks to remove an existing allocation.
- v) The policy seeks to remove an existing allocation.
- vi) N/A

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BFR3 Stambridge Mills, Rochford

- i) This site has been specifically identified in the Core Strategy to be reallocated for appropriate alternative uses, including residential (Policy H1 and ED3).
- ii) This site is being actively promoted and a planning application has been submitted.
- iii) The site follows the existing boundary of the entire industrial estate as currently allocated.
- iv) Although the policy includes reference to relevant Core Strategy requirements, it is felt that the inclusion of this wording does assist the interpretation and understanding of the Concept Statements.
- v) The Core Strategy and Open Space Study provide justification for these requirements.
- vi) This site has been specifically identified in the Core Strategy. The majority of the site does not form part of the Council's five-year housing land supply as identified in the latest housing trajectory (Annual Monitoring Report 2011-12). Greenfield sites identified later on in the plan period (post-2021) have the potential to be brought forward to meet any shortfall that may arise if required.

SER2 West Rochford

- i) The general location of West Rochford has been identified in principle for development within the Core Strategy. The site identified within this general location has been assessed in detail against the reasonable alternatives both within the Sustainability Appraisal (April 2013) – see tables page 49 – and Detailed Assessment of Residential Site Options (75.EB26). In addition, this site has been granted outline planning permission for the development of 600 dwellings and associated infrastructure.
- ii) This site is being actively promoted, and it is anticipated that these will be delivered by 2018 as set out in the housing trajectory within the Annual Monitoring Report 2011-12.
- iii) This site has been granted outline planning permission for the development of 600 dwellings.
- iv) Although the policy includes reference to relevant Core Strategy requirements, it is believed that the inclusion of this wording does assist the interpretation and understanding of the Concept Statements.
- v) N/A
- vi) This general location for development has been identified in principle within the Core Strategy. The reasonable alternatives have been assessed within the Sustainability Appraisal and the proposed site is considered to be the most sustainable. In addition, outline planning permission has been granted for the site.

SER4 South Hawkwell

- i) The general location of South Hawkwell has been identified in principle for development within the Core Strategy. The site identified within this general location has been assessed in detail against the reasonable alternatives both within the Sustainability Appraisal (April 2013) – see tables pages 51-53 – and Detailed Assessment of Residential Site Options (75.EB26). Further, this site has been granted permission for the development of 176 dwellings and associated infrastructure, and construction has begun.

Whilst representations have been made during the consultation which have suggested extending the boundary in a southerly direction to accommodate further residential development, the planning application currently being implemented can deliver the dwelling and infrastructure requirements for this general location, and would provide a defensible Green Belt boundary in accordance within Core Strategy Policy GB1.

- ii) This site has been granted permission for the development of 176 dwellings and associated infrastructure, and construction has begun.
- iii) This site has been granted permission for the development of 176 dwellings and associated infrastructure, and construction has begun.
- iv) Although the policy includes reference to relevant Core Strategy requirements, it is believed that the inclusion of this wording does assist the interpretation and understanding of the Concept Statements.
- v) N/A
- vi) This general location for development has been identified in principle within the Core Strategy. The reasonable alternatives have been assessed within the Sustainability Appraisal and the proposed site is considered to be the most sustainable. In addition, this site has been granted permission for the development of 176 dwellings and associated infrastructure, and construction has begun.

SER8 South East Ashingdon

- i) The general location of South East Ashingdon has been identified in principle for development within the Core Strategy. The site identified within this general location has been assessed in detail against the reasonable alternatives both within the Sustainability Appraisal (April 2013) – see tables pages 57-58 – and Detailed Assessment of Residential Site Options (75.EB26).
- ii) This site is being actively promoted and is expected to come forward post-2021, unless it is needed to come forward to ensure a five-year housing land supply.
- iii) This site has been assessed in detail against the reasonable alternative options both within the Sustainability Appraisal and within the detailed assessments. For example, the Sustainability Appraisal (April 2013) noted that:

“Policy SER8 performs well against a number the sustainability criteria. It is well connected to the existing settlement and would ensure a strong green buffer to the east.” (page 58).

- iv) Although the policy includes reference to relevant Core Strategy requirements, it is believed that the inclusion of this wording does assist the interpretation and understanding of the Concept Statements.
- v) N/A
- vi) This general location for development has been identified in principle within the Core Strategy. The reasonable alternatives have been assessed within the Sustainability Appraisal and the proposed site is considered to be the most sustainable.

Questions for specific sites/locations:

Great Wakering

- i) Is it realistic to anticipate that existing industrial uses would re-locate to the new employment site?

The quality of the building stock on this industrial estate was found to be very poor as identified in the 2008 Employment Land Study. The study subsequently recommended that the industrial estate be reallocated for other uses. As such, the principle of reallocating the industrial estate for appropriate alternative uses, including residential, was subsequently established through the Rochford Core Strategy.

The Council is committed to assisting in the relocation of any businesses on the existing industrial estate, as set out in the 2011 Economic Development Strategy (41.D9):

“The Economic Development Unit will work with planning colleagues to ensure that the relocation of industrial estates is economically viable and deliverable, to ensure that any intentions in this respect are effectively communicated to the business community so that they can plan for change and also to ensure that those businesses are adequately supported.” (page 30).

- ii) If either Sites SER9a or 9b are found unsound, would the land west of Alexandra Road included in Option WGW3 (Representation 28791) be sound?

This alternative site has been considered throughout the preparation of the Allocations against the reasonable alternatives, and it was included as part of Option WGW3 in the Discussion and Consultation Document.

A response to the initial consultation on the Sustainability Appraisal for the Allocations in February 2012 highlighted that the land to the west of Alexandra Road could be of ecological value in terms of its physical characteristics, relationship to the Local Wildlife Site and potential to support important wildlife.

Subsequently the Council contacted the Essex Wildlife Trust for its opinion on the ecological value of the site and received a response in April 2012 (see Appendix 10) highlighting its significance from an ecological perspective. The updated Sustainability Appraisal (July 2012) for site WG3 was therefore amended to take account of this information. This acknowledgement of potential ecological value of the site has also been included within the final Sustainability Appraisal (April 2013) – see page 58 for example. The Council also received a wildlife survey prepared by local residents for the site (see Appendix 11 and 12).

In addition, a site visit was undertaken as part of the 'Detailed Assessment of Potential Residential Site Options (September 2012)' (75.EB26) although it should be noted that this did not involve a specific assessment of the local ecology. The assessment, however, recognised that the site has the potential to be of ecological importance – see page 671 onwards.

As such, the inclusion of this site was less preferable given the available alternatives.

- iii) If Site NEL3 is found unsound, would the land on the western side of Tithe Park included in Options E23 and E24 (Representation 28826) be sound?

The land on the western side of Tithe Park is well related to the settlement of Shoebury. As such it is less well related to the village of Great Wakering and the services and facilities located there. NEL3 on the other hand would be well related to Great Wakering.

Options E23 and E24, in addition to other alternative options, were found in the Sustainability Appraisal (April 2013) to promote coalescence between Great Wakering and Shoebury.

Rayleigh

- i) In the absence of a specific promoter is it realistic to assume that site BFR4 will come forward and are the expectations for site density justified given its location?

The Council note that the development of the site is unlikely to occur in the short-term, and the housing policies account for this. Further, the viability study (see Appendix 3) recommends that this site is not included within the Council's five-year land supply. Although Rawreth Industrial Estate is included within the Council's housing trajectory over the plan period, it does not form part of the five-year housing land supply. Therefore it has the prospect of being developable over the longer term.

The 2012 SHLAA Review recognises that higher density development would be appropriate for Rawreth Industrial Estate due to exceptional circumstances of the site (i.e. the scale and mass of the buildings currently occupying it). The report also notes that higher density development would have a positive impact on economic viability.

- ii) Is there sufficient detail about replacement and additional playing field and sporting facilities in Policy SER1?

The Plan is considered to provide adequate detail on the relocation of the playing field at this stage. However, additional information on the proposed relocation is provided within the Statement of Common Ground between the Council and Countryside Properties (see Appendix 4). A Statement of Common Ground has also been agreed with Sport England (see Appendix 13).

It is anticipated that further detail would be submitted and agreed at the planning application stage.

- iii) Can satisfactory highway access be devised for Site NEL2?

Although Essex County Council Highways have objected to the allocation of NEL2 on highway grounds, a report has been prepared by Arup on behalf of the landowner (see Appendix 7), which recommends that a safer and higher standard of access and egress for the site could be provided to serve the proposed development.

Hullbridge

- i) Have the consultation procedures undertaken been adequate and in compliance with the Statement of Community Involvement and the Town and Country Planning (Local Planning) (England) Regulations 2012?

The Council sought to increase awareness of the future planning for the District initially through the Core Strategy process and to encourage individuals and organisations to participate in the plan making process in a number of ways as set out above (see response to question 1).

Particularly in relation to Hullbridge, manned exhibitions took place during consultation on the 2006 Issues and Options and 2007 Preferred Options Document at Ferry Road Car Park in Hullbridge and Hullbridge Parish Council Offices respectively. This was in addition to those on the Council's mailing list (either because they had responded to previous consultations, or expressed an interest in being involved in the plan making process) being consulted directly through consultation letters and emails, and other forms of media including press releases, posters and articles in Rochford District Matters. Rochford District Matters is the Council's free newsletter that is sent to all households in the District.

During the 2008 Revised Preferred Options consultation, there was an unmanned public exhibition in Hullbridge library for the duration of the consultation. School workshops at Fitzwimarc School, Rayleigh; Greensward Academy, Hockley; and King Edmund School, Rochford were undertaken, and leaflets were also handed out to commuters at train stations, including Rayleigh, which is the closest train station in the District to Hullbridge. Again, this was in addition to consultation letters and emails being sent, press releases and notices being published, posters and articles in the Council's free newsletter, Rochford District Matters.

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In addition, letters and emails were sent out to those individuals and organisations on the Council's mailing list highlighting the Submission Document consultation in 2009, alongside an article in Rochford District Matters, posters and local press coverage.

The Council operates a mailing list for those individuals interested in planning policy and the development of the District, who are directly informed when consultation events are planned to take place, and are invited (either through email or letter) to comment. As set out above (see response to question 1), a wide range of specific and general consultation bodies were invited to make representations on both stages of the Allocations. The specific consultees invited to comment, as well as the number of representations received, is set out in the Consultation Statement for the Allocations.

Over 1,100 representations were made on the options for Hullbridge during consultation on the initial stage of the document in 2010. Hullbridge Parish Council and the Hullbridge Action Group commented during the consultation. A petition from the Hullbridge Action Group with over 1,300 signatures was also handed into the Council (representation number 21466). Consequently Hullbridge Parish Council, the Hullbridge Action Group and other Hullbridge residents who responded to the previous consultation were invited to comment on the submission document in November 2012. In total, 191 representations specifically commenting on the proposed Hullbridge allocation were received during the pre-submission consultation on the Plan. Hullbridge Parish Council commented, whereas the Hullbridge Action Group did not.

The preparation of the Allocations Document has been in compliance with the Statement of Community Involvement, having entailed the use of a wide range of media to advertise the consultation and how people can get involved. In addition to the mailing list of individuals and organisations, the Council also advertises such events on its website, Parish Council notice boards, in local media and within the Council's free newsletter, Rochford District Matters, where appropriate.

The Council has also sought to use other community engagement techniques, with officers attending an Information Day in Hullbridge during the consultation on the initial stage of the Plan in April 2010 to raise awareness of the consultation. Information on the Council's proposed plans for the future of the District was available to view, and residents were able to ask officers questions about the proposals, including the residential options for Hullbridge. Officers also gave a presentation on the purpose and content of the document at an evening public meeting in Hullbridge in April 2010, which was well attended by members of the public. The public could also ask questions at the meeting. Leaflets, which summarised the document and explained how to comment, were available at the meeting.

An example of the press coverage in relation to Hullbridge, and articles included within Rochford District Matters are attached (see Appendix 1 and 2).

Residents from Hullbridge who were on the Council's mailing list were directly consulted on the submission document in November 2012 and were invited to comment. A follow-up mailshot was also sent in early January 2013 to those with an email address to remind them of the opportunity to participate in the consultation. Other forms of media included press releases, posters in parish council notice boards, local

media coverage and an article in Rochford District Matters, the Council's free newsletter.

The Council considered each of the representations submitted during each consultation stage and identified the main issues raised by respondents. These issues as well as officers initial responses to these at both stages in the preparation of the Plan have been included in the Consultation Statement for the Allocations.

The Allocations has been prepared since 2010 taking into consideration consultation responses received at each stage. The Council were also mindful of comments raised during the preparation of the Core Strategy. The Submission Document sought to address issues raised during the 2010 consultation, for example recognising within the Concept Statement, for Hullbridge in particular, that where surface water flooding is recognised as an existing issue this would need to be addressed. As a further example, additional sites submitted during the 2010 consultation on the Allocations were assessed in further detail alongside the sites included within the Discussion and Consultation Document.

- ii) Is it reasonable to sub-divide the allocated area so that the second phase on SER6b is prevented until after 2021?

The principle of this site being delivered in two phases is established in the Core Strategy. This would encourage brownfield development ahead of greenfield.

- iii) Can the necessary highway and other infrastructure be provided having regard to flooding along Watery Lane, drainage and sewage?

Development within the general location of South West Hullbridge has been established within the adopted Core Strategy.

As set out in the Concept Statement, improvements to Watery Lane would need to accompany development of the site, and appropriate Sustainable Drainage Systems would need to be implemented to manage surface water runoff.

The Statement of Common Ground between the Council and Phase 2 Planning on behalf of Landhold Capital (see Appendix 8) recognises that Watery Lane is a locally important route into and out of the District to the west, which requires some improvement, for example in respect of surface water flooding, and that improvements need to be delivered as part of the development of the site. Further detailed information on such improvements would be provided at the planning application stage.

In terms of sewage, the Water Cycle Study (56.EB7A) identifies that there is sufficient volumetric capacity at Rayleigh West Wastewater Treatment Works for the proposed growth although, as noted within the Concept Statement, an upgrade to the wastewater transmission network would be required. Anglian Water, however, did not raise any objections to the proposed allocation of SER6.

- iv) How will the development be integrated into Hullbridge?

The proposed development to the south west of Hullbridge will not only be physically linked via roads and pedestrian links to the existing village, but the community will be integrated through the provision of community, leisure and open space facilities. There is flexibility to enable these facilities to potentially be located within the existing village to encourage their shared use.

The layout of the proposed development, for example through the requirement to provide pedestrian links to the village to the east, will be such that use of existing shops and services will be encouraged. Further detail will be provided at the planning application stage.

- v) If Site SER6 is found unsound, would Site 17 (Representations 28689 and 29006) be sound?

The allocation of Site 17 instead of SER6 is not considered to be sound *per se* when compared to the preferred site in that its allocation could not be justified compared to reasonable alternatives (i.e. SER6).

Site 17 has been considered in detail during the preparation of the Allocations Document, and formed part of an alternative option for allocation within the Discussion and Consultation Document (referred to as Option SWH4⁵). The site has subsequently been appraised in some detail both as part of a wider allocation to the south west of Hullbridge within the Sustainability Appraisal (67.EB18) – Option SWH4 – and as an individual site within the Detailed Assessment of Potential Residential Site Options September 2012 (75.EB26).

SER6a and SER6b encompass a total of 23.4 hectares, whereas Site 17 is 2.23 hectares. As such, this site alone would not be able to accommodate the dwelling and infrastructure requirements for the general location of South West Hullbridge as set out in the adopted Core Strategy.

Canewdon

- i) Have the consultation procedures undertaken been adequate and in compliance with the Statement of Community Involvement and the Town and Country Planning (Local Planning) (England) Regulations 2012?

The Council sought to increase awareness of the future planning for the District initially through the Core Strategy process and to encourage people to participate in the plan making process in a number of ways as set out above (see response to question 1).

Particularly in relation to Canewdon, manned exhibitions took place during consultation on the 2006 Issues and Options and 2007 Preferred Options Document at Canewdon Village Hall. This was in addition to those on the Council's mailing list (either because they had responded to previous consultations, or expressed an interest in being

⁵ Allocations DPD: Discussion and Consultation Document, available from: http://fs-drupal-rochford.s3.amazonaws.com/pdf/planning_ldf_allocationsdpd2.pdf

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involved in the plan making process) being consulted directly through consultation letters and emails, and other forms of media including press releases, posters and articles in Rochford District Matters. Rochford District Matters is the Council's free newsletter that is sent to all households in the District.

During the 2008 Revised Preferred Options consultation, there was an unmanned public exhibition in the entrance of Canewdon Village Hall for the duration of the consultation. School workshops at Fitzwimarc School, Rayleigh; Greensward Academy, Hockley; and King Edmund School, Rochford were undertaken, and leaflets were also handed out to commuters at train stations, including Rochford and Hockley, the closest stations to Canewdon. Again, this was in addition to consultation letters and emails being sent, press releases and notices being published, posters and articles in Rochford District Matters.

In addition, letters and emails were sent out highlighting the Submission Document consultation in 2009, alongside an article in Rochford District Matters, the Council's free newsletter, posters and local press coverage.

The Council operates a mailing list for those individuals interested in planning policy and the development of the District, who are informed when consultation events are planned to take place, and are directly invited (either through email or letter) to comment. As set out above (see response to question 1), a wide range of specific and general consultation bodies were invited to make representations on both stages of the Allocations. The specific consultees invited to comment, as well as the number of representations received, is set out in the Consultation Statement for the Allocations.

Over 100 representations were made on the different options for Canewdon during the initial consultation on the Allocations in 2010. Canewdon Parish Council also commented during the consultation. These individuals and Canewdon Parish Council were directly consulted again on the submission document in November 2012 and invited to comment. In total 73 representations specifically commenting on the proposed Canewdon allocation were received during the pre-submission consultation on the Plan.

The preparation of the Allocations Document has been in compliance with the Statement of Community Involvement, having entailed the use of a wide range of media to advertise community engagement and consultation events. In addition to the mailing list of individuals and organisations that were directly consulted, the Council also advertises such events on its website, Parish Council notice boards, in local media and within the Council's free newsletter, Rochford District Matters, where appropriate. The Council has also sought to use other community engagement techniques, with officers giving a presentation on the purpose and content of the document at an evening public Parish Council meeting in Canewdon in April 2010, which was well attended by members of the public. The public could also ask questions at the meeting. Leaflets, which summarised the document and explained how to comment, were available at the meeting.

An example of the articles included within Rochford District Matters are attached (see Appendix 2).

Residents from Canewdon who were on the Council's mailing list were directly consulted on the submission document in November 2012 and were invited to comment. A follow-up mailshot was also sent in early January 2013 to those with an email address to remind them of the opportunity to participate in the consultation. Other forms of media included press releases, posters in parish council notice boards, local media coverage and an article in Rochford District Matters.

The Council considered each of the representations submitted during each consultation stage and identified the main issues raised by respondents. These issues as well as officers initial responses to these at both stages in the preparation of the Plan have been included in the Consultation Statement.

The Allocations has been prepared since 2010 taking into consideration consultation responses received at each stage. The Council were also mindful of comments raised during the preparation of the Core Strategy. The Submission Document sought to address issues raised during the 2010 consultation, for example concern expressed in relation to infrastructure provision, particularly highways, and subsequently officers have liaised closely with the Highway Authority in identifying the proposed allocation and in the development of the Concept Statement. As a further example, additional sites submitted during the 2010 consultation on the Allocations were assessed in further detail alongside the sites included within the Discussion and Consultation Document.

- ii) Would development of Site SER7 conserve the heritage asset of St Nicholas Church in a manner appropriate to its significance? How could this be achieved by design?

The land in question is not subject to a statutory heritage related designation i.e. it is not located within the curtilage of a Listed Building or within a Conservation Area.

Essex County Council's Historic Buildings Advisor, as set out in the attached statement (see Appendix 9), does not consider that the location of SER7 would have a significant impact on the Canewdon Church Conservation Area, particularly as there is residential development to the north and north east which is not in-keeping with the character. However, design of the proposed development would still need to be of high quality.

In terms of the potential impact on St Nicholas Church, it is considered that whilst the route from Lark Hill Road is considered to be of less significance than the route from the High Street to the Church, the design of the development would need to take account of the views from Lark Hill Road.

It is considered that a masterplan/design brief would be appropriate for this site given the proximity of the site to St Nicholas Church and the sensitive nature of the topography in the area.

In particular, the Allocations Submission Document (April 2013) requires the following:

- An area of open space is located to the north of the proposed development (paragraph 3.211);
- That development is sensitive to the views of St Nicholas Church – particularly from the south west (paragraph 3.212);

- The western section of the proposed site should accommodate lower density development (paragraph 3.213);
- Design would need to take into account the Canewdon Church Conservation Area, and the Listed Buildings to ensure there is no adverse impact on their setting (paragraph 3.218).

This site was assessed against the reasonable alternatives within the Sustainability Appraisal (April 2013) – see pages 56-57. However, the appraisal found that:

“The proposed site for Policy SER7 performs well against the sustainability criteria. It is well related to the existing settlement of Canewdon following the natural boundaries along the approach to St Nicholas Church and not projecting northward of the existing development to the west of the site to the north of Lark Hill Road.” (page 57).

The Canewdon Church Conservation Area Appraisal (35.D3) refers to the lane leading north to the Church from Lark Hill Road, although not located within the Conservation Area:

“The lane running off Lark Hill Road is a historic route leading to Canewdon Hall. It climbs the hill to the church tower in a gentle curve that draws the eye upwards, providing visual drama as the massive tower reveals itself above the surrounding trees and hedgerow (Fig. 17). The lane is edged with hedgerow contributing to the rural character, and the modern housing developments of Canewdon village are visible across paddocks to the east. Field gates provide access to the vicarage grounds from the lane. At the top of the hill the lane opens up to provide a parking area by the west gate to the churchyard, and a field gate leads through to Canewdon Hall Farm. Gaps in the hedge at the top of the lane allow expansive views north towards the Crouch estuary and west across arable fields towards Ashingdon.” (paragraph 6.10).

Whilst the appraisal considers important views in, out and through the Conservation Area (Figure 18) the view of the rear of the Church from Lark Hill Road has not been included as an important view into the Conservation Area.

- iii) Is the allocation contrary to the Policy H2 of the Core Strategy which refers to “South Canewdon” whereas at least part of the site lies to the west?

SER7 lies within the general location of South Canewdon, as identified on the Core Strategy Key Diagram.

- iv) If Site SER7 is found unsound, would Option SC1 (Representation 28760) be sound?

Option SC1 has been considered throughout the Allocations process. The detailed Sustainability Appraisal for SER7 found that extending the residential area along Lark Hill Road would retain the village to the north of the road rather than encourage development to the south of Anchor Lane.

Issue 3

Is the allocated traveller Site GT1 at West Rayleigh justified, deliverable within the plan period and consistent with national policy?

Questions:

- i) Is the site selected justified when compared to other reasonable alternatives?

The Council has considered the reasonable alternative sites as set out within the Sustainability Appraisal (April 2013) – see tables pages 59-60 – and the Detailed Assessment of Potential Residential Site Options September 2012 (75.EB26). The Council has considered all sites submitted for consideration, through the Call for Sites process, alongside unauthorised sites.

- ii) Is the proposed development deliverable over the plan period having regard, amongst other things, to ownership issues, infrastructure constraints, land contamination, noise, air quality and dust?

This site is being promoted for development and there have been no objections from the landowner in respect of this allocation, as set out in the attached Statement of Common Ground (see Appendix 14). The Council has also prepared a statement which outlines how the proposed Gypsy and Traveller site would be delivered and managed (Appendix 15).

Essex County Council has confirmed in the attached Statement of Common Ground that the existing access could, provided it is upgraded to be in compliance with the 'Design Manual for Roads and Bridges', serve the proposed development of 15 Gypsy and Traveller pitches (see Appendix 16).

The Council has considered the potential contamination at Michelins Farm in Rayleigh throughout the preparation of the Allocations.

The Sustainability Appraisal for the Allocations Submission Document - Post Pre-Submission Consultation (April 2013) noted that:

"The site is currently not identified as contaminated land. This would need to be investigated prior to any development." (page 384).

In addition, the Detailed Assessment of Potential Residential Site Options (September 2012), based on a site assessment, surmised that:

"The site is currently not identified as contaminated land. However there is potential, given the past use of the site and that it is degraded greenfield land, that the site could be contaminated. This would need to be investigated prior to any development." (page 810).

Further, the Council has contacted the Environment Agency who have advised that the site is prone to localised pockets of contamination due to the unauthorised burning and

depositing of waste on the site, rather than the whole site being contaminated (see Appendix 17).

The Council's Principal Environmental Health Officer has also advised that an assessment of land contamination, and remediation as appropriate, would be required prior to any development of the site for residential or industrial uses (see Appendix 18). It should be noted that a court order has been made against the land owner of GT1, as well as NEL2, to clear remove all hazardous waste, vehicles, plant and machinery, as well as all other waste, from the site (see Appendix 6).

In relation to the potential for noise, air quality and dust issues to arise, it should be noted that there is already residential development in proximity to the site (located on the southern boundary with the A127 in Basildon Borough). This has previously been acknowledged within the detailed assessments for the whole site (75.EB26 – see page 806 onwards). Advice from the Council's Principal Environmental Health Officer has confirmed that noise could be overcome with appropriate bunds/acoustic fencing, and air quality issues could be adequately addressed through planning and other regulatory controls (see Appendix 18).

- iii) Can the site be developed independently of Site NEL2?

The existing access could, provided it is upgraded to be in compliance with the 'Design Manual for Roads and Bridges', serve the proposed development of 15 Gypsy and Traveller pitches (see Appendix 16). As such, this site could be delivered in isolation of the proposed adjacent employment site (NEL2).

- iv) Are the detailed site boundaries appropriate bearing in mind neighbouring uses?

The current siting of the uses at Rawreth Industrial Estate is such that it has become a "bad neighbour" for the surrounding residential uses, with insufficient buffers to counteract the noise and air quality issues. However, the proposed site, as confirmed by the Council's Principal Environmental Health Officer has the potential to offset noise through bunds/acoustic fencing and any air quality issues through planning and other regulatory controls (see Appendix 18).

- v) Can satisfactory highway access be devised?

Essex County Council Highways has stated the following in their representations during the pre-submission consultation as follows:

"The site access/egress to the proposed allocation would contribute to congestion and safety concerns at this strategic junction and be contrary to a number of current Highways Development Management Policies. Nevertheless, it may be possible to cater for the traffic movements arising from not more than 15 gypsy and traveller pitches in a manner that has minimum impact on existing levels of traffic movement and safety. Accordingly, the local highway authority would wish to further discuss with the district council the potential traffic implications of this proposed allocation." (representation number: 29023).

As such, the Council have agreed a Statement of Common Ground with the Highways Authority in relation to access for the proposed site at GT1 (see Appendix 16).

- vi) If Site GT1 is found unsound, would 'swapping' the traveller site with the allocated employment site NEL1 (Representation 28693) be sound?

This would not be a sound alternative allocation to GT1. The potential allocation of land at NEL1 to be allocated for a Gypsy and Traveller site has been considered in detail both within the Sustainability Appraisal (April 2013) – see tables pages 59-60 – and the Detailed Assessment of Potential Residential Site Options (75.EB26).

The allocation of a site within the proposed NEL1 allocation was considered at the Discussion and Consultation stage (with the reference of Option GT3). The Sustainability Appraisal (April 2013) concludes that:

“GT3 was found to perform reasonably well against the sustainability objectives, however, the Updated SA (July 2012) noted that high voltage power lines run through this option site and are unlikely to be viable to move given the scale of the potential development. This option is also located within the proposed new employment land allocation (NEL1) and has been rejected.” (page 60).

The detailed assessment of potential site options concluded that at least 0.75 hectares would be required to accommodate 15 pitches by 2018 (75.EB26 – page 745). As indicated above, there are power lines running through the eastern section of NEL1. The allocated land in accordance with other policies in the Plan would need to be at least 30m distance from the pylons, and given the size requirements to accommodate 15 pitches, this is unlikely to be deliverable, or developable, on the eastern section of NEL1 in accordance with Policy B of 'Planning policy for traveller sites'. In addition, the majority of the western section of NEL1 is currently in use for employment and as such it is not considered to be deliverable within five years.

In contrast, GT1 encompasses a one hectare site and has the capacity to accommodate 15 pitches by 2018. It is currently being promoted for development (see Appendix 14) and would be deliverable within five years. As above, the Council has prepared a statement which outlines how the proposed Gypsy and Traveller site would be delivered and managed (Appendix 15).

Issue 4

Are the existing employment, ecological and landscape, educational, open space and leisure facilities, town centre and primary shopping area boundary allocations justified, likely to be effective and consistent with national policy?

Existing employment – The principle of continuing to allocate existing employment land for employment use is established within the Core Strategy (Policy ED3). No objections were received on the proposed allocations (Policy EEL1-3).

Ecological and landscape – The principle of continuing to protect Local Wildlife Sites, the Coastal Protection Belt and the Upper Roach Valley is established within the Core Strategy

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(Policy ENV1, ENV2 and URV1). The designation of these sites for protection was generally supported (Policy ELA1-3). These allocations are supported by the Strategic Environmental Assessment (SEA) Baseline Information Profile for the District, and the 2007 Local Wildlife Sites Review.

Educational – It is important to allocate the existing school sites to ensure that land is retained for this use. Whilst Essex County Council has objected to the inclusion of school playing fields within the Green Belt boundary, the Council has stated that:

“It should be noted that the Allocations Document does not propose to draw the Green Belt boundary tightly around the footprint of schools. Instead, it removes school and a curtilage area from the Green Belt; but leaves playing pitches allocated as Green Belt. It is recommended that, for clarity; text at paragraph 7.15 is amended to state that schools buildings and their curtilages are removed from the Green Belt.” (Consultation Statement, page 180). Policy EDU4 is considered to be appropriate.

Open space and leisure facilities – The principle of protecting existing open space and leisure facilities, as appropriate, is established within the Core Strategy (Policy CLT5 and CLT9 respectively). No objections were received on the proposed allocations (Policy OSL1-3). The open space allocations are further supported by the 2009 Open Space Study.

Town centre and primary shopping area boundaries – These allocations follow the recommendations within the Retail and Leisure Study.

Further, all of the proposed allocations have been subject to Sustainability Appraisal.

Issue 5

Has the Plan clear and effective mechanisms for implementation, delivery and monitoring?

Chapter 10 of the Allocations Submission Document (April 2013) sets out the mechanisms for implementation, delivery and monitoring.

The indicators set out within the Allocations Submission Document Sustainability Appraisal (April 2013) will also be included within the Annual Monitoring Report.

The Plan will also be monitored using indicators identified in the monitoring section of the Core Strategy (see Chapter 13).