



The Planning Inspectorate

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# Report to Rochford District Council

**by David Smith BA (Hons) DMS MRTPI**

**an Inspector appointed by the Secretary of State for Communities and Local Government**

**Date: 14<sup>th</sup> February 2014**

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PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

## **REPORT ON THE EXAMINATION INTO THE ROCHFORD ALLOCATIONS SUBMISSION DOCUMENT**

Document submitted for examination on 18 April 2013

Examination hearings held between 3 September and 11 September 2013

Ref: PINS/B1550/429/8

## **Abbreviations Used in this Report**

CS	Core Strategy
HRA	Habitats Regulations Assessment
JAAP	London Southend Airport and Environs Joint Area Action Plan
LDS	Local Development Scheme
LP	Local Plan
MM	Main Modification
NPPF	National Planning Policy Framework
PPTS	Planning Policy for Traveller Sites
RASD	Rochford Allocations Submission Document
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment

## **Non-Technical Summary**

This report concludes that the Rochford Allocations Submission Document provides an appropriate basis for the planning of the District until 2025 provided that a number of modifications are made. The Council has specifically requested that necessary modifications are recommended to enable it to adopt the Plan.

The modifications can be summarised as follows:

- Removing the 5% 'cap' on additional dwellings above the figure specified in the settlement extension policies;
- Providing a link to the Site Map to confirm the land allocated for development;
- Specifying that a master plan or design brief be submitted for certain sites;
- Changing the policies for brownfield allocations in relation to open space and affordable housing having regard to viability;
- Substituting an alternative site for employment at Great Wakering (Policy NEL3);
- Making alterations to the policies at Great Wakering to clarify the access arrangements (Policies BFR1, SER9 and NEL3);
- Adjusting the site boundary of the land to the north of London Road, Rayleigh (Policy SER1) and various detailed changes to the policy;
- Deleting the employment allocation to the south of London Road, Rayleigh (Policy NEL1);
- Altering Policy SER6 concerning south west Hullbridge in the interests of effectiveness; and
- Omitting the western portion of the allocated site at Canewdon (Policy SER7) and confirming the form of development on the eastern section.

## Introduction

1. This report contains my assessment of the Rochford Allocations Submission Document (RASD) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate, in recognition that there is no scope to remedy any failure in this regard. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (NPPF) (paragraph 182) makes clear that to be sound, a Local Plan should be positively prepared; justified; effective and consistent with national policy.
2. The starting point for the examination is that the Council has submitted what it considers to be a sound Plan. The basis for my examination is the RASD of April 2013 which was modified following the pre-submission consultation between 29 November 2012 and 25 January 2013.
3. In accordance with section 20(7C) of the 2004 Act the Council has requested that I should make any modifications needed to rectify matters that make the Plan unsound or not legally compliant and thus incapable of being adopted<sup>1</sup>. The main modifications required to make the Plan sound and legally compliant are identified in bold in the report (**MM**) and are set out in the Appendix. They have been subject to public consultation and Sustainability Appraisal (SA). The Council may also make additional modifications which do not materially affect the policies. However, these are not covered by this report.
4. In accordance with Regulation 23 of the Town and Country Planning (Local Planning) (England) Regulations 2012 I have given consideration to the written representations made under Regulation 20. I have also taken account of the oral contributions made during the hearing sessions. However, this report does not deal with all of these individually but rather concentrates on whether the various aspects of the RASD are sound and legally compliant.

## Duty to Co-operate

5. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on them by section 33A in relation to the Plan's preparation.
6. The key strategic matters relating to sustainable development in the District were settled in the Core Strategy (CS) adopted in December 2011. Nevertheless the Council has continued to liaise with Essex County Council and with neighbouring authorities in a meaningful and constructive way. It has also engaged positively with other bodies prescribed by Regulation 4 including the Environment Agency and English Heritage. Details are provided in the Consultation Statement<sup>2</sup>. As such I am satisfied that the duty has been met.

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<sup>1</sup> Document EXA176

<sup>2</sup> Document SUBDOC8

## Consultation

7. Section 20(5)(a) of the 2004 Act requires that I consider whether the Council has complied with their statement of community involvement as set out in section 19(3). In addition, Regulation 18 states that local planning authorities must take into account any representation made to them during the preparation of a local plan.
8. The Statement of Community Involvement (SCI) is dated January 2007<sup>3</sup>. It confirms that the Council will use a number of techniques at various stages of the development plan process. The objectives of the SCI are, briefly, to engage effectively with all sections of the community; to use appropriate techniques and to improve the quality of decision-making. The Council has provided copious details of the steps it has taken to inform people about the RASD although Regulation 18(2)(c) allows discretion in terms of who it is appropriate to invite representations from. Although there are quibbles about how this was undertaken I am satisfied that the Council has carried out the relevant techniques listed in the SCI.
9. Nevertheless the situation in Rayleigh is that very many people had been unaware of the specific proposals contained in Policies BFR4, SER1, NEL1, NEL2 and GT1. About 93% of over 5,000 objectors are in this category<sup>4</sup>. It is impossible to be certain how this situation arose given the efforts made by the Council over a considerable period of time. There were also 195 objections to the Discussion and Consultation Document in 2010<sup>5</sup> about 550 dwellings to the north of London Road so some people did know about this proposal. However, from what I have read and heard, it may be that there was an over-reliance on the use of Rochford Matters (a free newspaper) and that the information given about the RASD and the CS that preceded it was general rather than specific due to the Council's reluctance to summarise. That said, there is no evidence that the specific measures set out in the SCI have not been followed. Furthermore, it should be borne in mind that there is no requirement to consult with everyone likely to be affected by a local plan in a particular way. Consequently I am satisfied that the broad expectations of the SCI and the Regulations have been complied with.
10. In respect of South West Hullbridge and South Canewdon 187 and 66 objections respectively were received during the pre-submission consultation. Whilst there may be issues of credibility and trust for some it is apparent that many people were aware of the proposals within Policies SER6 and SER7 and able to comment on them. Furthermore, the RASD was changed prior to submission for examination to, for example, cover the flood risk issues raised. The other criticism is that the Council failed to take account of representations received but simply announced a pre-determined outcome. If the Council's preferred site is fundamentally different to that of residents this does not necessarily mean that representations have been ignored. It is simply that the Council has reached a different view having gone through a long process of

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<sup>3</sup> Document SUBDOC13

<sup>4</sup> Appendix 1 of Documents EXA132 and EXA133

<sup>5</sup> Document SUBDOC9

sifting and assessing options through various means over time<sup>6</sup>. As such, my view is that the Regulations have been adhered to in this regard.

11. Some respondents refer to the Localism Act 2011 but its relevant provisions amended the 2004 Act and do not add any separate, further duties for me or for the Council. Therefore my overall conclusion is that the steps undertaken in relation to consultation are both sound and legally compliant.

## **Assessment of Soundness**

### **Main Issues**

12. Taking account of all the representations, written evidence, site visits and the discussions that took place at the examination hearings I have identified 5 main issues upon which the soundness of the Plan depends.

### **Issue 1**

***Is the overall strategy for the allocation of housing, traveller and employment sites sound having regard to the relationship with the National Planning Policy Framework; the needs and demands of the District identified in the Core Strategy and the evidence base and preparatory processes?***

13. The RASD is intended to sit below the CS and to support and aid the policies within it. As such, it does not purport to re-visit the vision, strategies, activities and actions enshrined within it. Rather it seeks to take that approach forward and, in particular, to set out where development identified in the CS should be provided. Although there is no longer a hierarchy of plans Regulation 8(4) requires that local plans are "consistent" with the adopted development plan.
14. It is suggested that the Council cannot achieve a 5 year housing land supply because the need for housing is greater than that specified in the CS due to under-delivery in the past. Furthermore, that the delivery of new homes from sites such as West Rochford (Policy SER2) will be slower than anticipated. This is supported by the uncertainty over the delivery of the Rawreth Industrial Estate (Policy BFR4) and, to a lesser extent, part of the Star Lane Industrial Estate (Policy BFR1). My view is also that the number of houses planned at Canewdon (Policy SER7) should be marginally reduced.
15. On the other hand, the latest Annual Monitoring Report of 2011-2012<sup>7</sup> indicates that there is a 5 year supply. The Council is committed to an early review of the CS which is due to begin this year once a Strategic Housing Market Assessment (SHMA) has been completed. Furthermore, Policy H3 allows flexibility so that sites due to be delivered after 2021 can be brought forward if required to meet housing targets. To this end, there are no impediments to this occurring at either South East Ashingdon (Policy SER8) or Great Wakering (Policy SER9). In these circumstances and taking account of

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<sup>6</sup> Discussion and Consultation Document February 2010 (SUBDOC9), Sustainability Appraisal (Evidence Base Document 67.EB18 and SUBDOC4 and SUBDOC 5) and Detailed Assessment of Potential Residential Site Options (Evidence Base Document 75.EB26)

<sup>7</sup> Document SUBDOC14

my views below about the 5% 'cap' there is no need for further housing sites to be put forward to achieve soundness in relation to housing land supply.

16. Many representations argue that the housing developments proposed are wrong in principle as they would, amongst other things, intrude into the Green Belt. This includes the sites at Canewdon, Hullbridge (where a plea is made to withdraw the policy) and Rayleigh. However, the CS considered the need for housing within the District until 2025 and confirmed how this would be distributed across a number of different areas. It also accepted that Green Belt land would need to be allocated for residential development. So the broad approach to the location of new housing has already been definitively settled by the process of examining and finally adopting the CS. There is no overriding evidence to justify fundamental revisions to it.
17. Policy H2 of the CS confirms that the RASD should articulate the detailed location and quantum of development but it has already fixed the broad areas where new housing should occur. This means that all of the 9 settlement extension residential land allocations are sound in principle. It also means that many of the alternative options put forward that would not accord with the geographical descriptions given in Policy H2, such as Eastwood Nurseries, Poyntens Road, Rayleigh and Fossetts Farm, could not be sound.
18. Each of the settlement extension policies contain a statement about the maximum number of dwellings to be accommodated. This is further restricted by the imposition of a 5% 'cap' over and above the total of dwellings specified in the policy for each site. CS Policy H1 prioritises the use of previously-developed land. However, there is no evidence locally that the existence of greenfield allocations has a 'dampening effect' on brownfield sites from coming forward. Whilst the NPPF encourages the effective use of land by re-using land that is previously developed it also seeks to boost significantly the supply of housing. In this context the use of a prescriptive overall limit on development is contrary to the objectives of Government policy and unsound.
19. The Council therefore suggests deleting this provision. In so doing the number of dwellings anticipated for each site would not change. Furthermore, any increase above that figure is contingent upon there being a requirement to maintain a 5 year land supply and to compensate for a shortfall of dwellings. This measure would nevertheless allow for more flexibility in the provision of housing and a greater likelihood of ensuring an adequate supply. By not arbitrarily preventing best use being made of allocated sites it would also assist in minimising the amount of land taken out of the Green Belt.
20. There is concern that this change would, in effect, give developers 'carte blanche'. However, in dispensing with the 'cap' the areas allocated for development would be unaltered so that this, in itself, would not bring about additional intrusion into the Green Belt or coalescence. Moreover, other factors such as highway capacity and drainage would limit the units that could be accommodated within any site. These and other detailed issues would be considered through the normal exercise of development management policies as part of the planning application process.
21. Therefore deleting the 5% 'cap' would not have unintended or unwelcome consequences and modifications in this respect (**MM18, MM20, MM23,**

**MM31, MM33, MM34, MM37, MM38, MM40, MM41, MM43, MM44, MM47, MM57, MM61, MM71, MM73, MM75 and MM77**) are justified and necessary to make the RASD sound.

22. An underlying criticism is that the overall impact on highway capacity across the District has not been addressed. However, the Report on the Examination of the CS commented at paragraph 50 that: "... the County Council, as Highway Authority, has been involved in the preparation of the strategy and is satisfied that any impacts on the highway and transport network can be satisfactorily mitigated."<sup>8</sup> A close working relationship has been maintained with the County Council<sup>9</sup> through collaborative joint working arrangements and it remains satisfied that the travel demands arising from future development can be adequately addressed.
23. In this regard the Highway Authority's view is that a District-wide transport model would not accurately identify changes to the local network arising from development due to the scale of total provision and its distribution across Rochford. Instead the use of more detailed individual junction models is preferred. These could take into account existing, permitted and planned development. Transport Assessments would be expected to accompany planning applications arising from the allocations in the RASD.
24. However, there is very limited detail about existing traffic conditions in the District and a dearth of survey information other than that provided by representors. There is stress on the network and residents are sensitive to congestion. The role of the B1013 that runs through the heart of the District is a particular general concern although there are also more localised difficulties. Given the lack of detailed evidence about the wider long-term implications some lack confidence in the County Council's approach.
25. That said, notwithstanding the general misgivings, there is no technical information about the impact of additional traffic. Furthermore, there is no other assessment to contradict the Highway Authority's position that the network as a whole should be able to cope. Most significantly, the scale and location of development has already been assessed and determined through the CS. Because of all this the RASD is sound in this respect.
26. The policies themselves are lengthy and include the site context, site capacity and concept statement. They repeat many of the requirements which stem from policies in the CS such as those relating to affordable housing, Lifetime Homes, Sustainable Drainage Systems, on-site renewables, Code for Sustainable Homes, BREEAM and retail development. Infrastructure requirements are also set out in Appendix H1 of the CS and cross-referenced in Policy H1. Although not a model of good practice the form of the policies does provide comprehensive detail about what is expected so that major changes are not necessary.
27. However, in order that they are effective additional wording is required to provide a link to the Site Map confirming the land that is allocated for development (**MM1, MM9, MM13, MM21, MM32, MM35, MM39, MM42,**

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<sup>8</sup> Document EXA134

<sup>9</sup> Evidence Base Documents 79.EB30 and 80.EB31



**MM46, MM58, MM72, MM76, MM81, MM86 and MM90)** and that a master plan or design brief should be submitted in a number of cases (**MM3, MM11, MM15, MM24, MM48, MM62, MM74 and MM78**).

28. Policy CLT5 of the CS indicates that new public open space will be required to accompany additional residential development having regard to current and future need. However, it is not specific that all such provision should be on-site. Issues of viability may also occur on brownfield sites. Consequently changes to Policies BFR1, BFR3 and BFR4 are necessary in the interests of effectiveness (**MM4, MM5, MM12, MM16 and MM17**). A caveat to these policies in relation to the delivery of affordable housing is also necessary to ensure consistency with Policy H4 of the CS (**MM2, MM10 and MM14**).
29. Additional wording is required to clarify what is meant by a defensible Green Belt boundary taking account of paragraph 85 of the NPPF which refers to features that are readily recognisable and likely to be permanent (**MM19**).

## **Issue 2**

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

### **Great Wakering**

#### **Policy BFR1 Star Lane Industrial Estate, Great Wakering**

30. A current planning application for 116 dwellings is pending for the southern section of this site which comprises the former brickworks. Outstanding issues relating to the viability of affordable housing have been addressed and mitigation measures have been put forward in relation to the adjoining gas pipeline. There is nothing to suggest that the proposed quantum of development could not be achieved.
31. The northern section of the allocation comprises the Star Lane Industrial Estate. Because of viability issues it is accepted that this part of Site BFR1 should not be included in the 5 year housing land supply. Moreover, the latest Viability Study<sup>10</sup> indicates that development is barely feasible even if affordable housing were zero; that securing vacant possession would be a major exercise and that suitable secondary stock may not be available for re-location. Although the Economic Development Unit may assist and economic conditions may change I consider that there is some doubt as to whether the site will come forward for housing during the Plan period.
32. Whilst deliverability is an issue the redevelopment of the Industrial Estate is nevertheless included within Policy H1 of the CS following the identification of poor quality stock in the Employment Land Study of 2008<sup>11</sup>. In broad terms Policy BFR1 is therefore consistent with the CS. The expectation of the RASD is that the site as a whole could deliver 131 dwellings so that if the northern section remained in employment use the shortfall in numbers is likely to be a

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<sup>10</sup> Appendix 3 of Council's hearing statement (Document EXA126)

<sup>11</sup> Evidence Base Documents 54.EB5 & 54.EB5A

modest one that could be compensated for in other ways. Therefore subject to the modifications referred to earlier and those concerned with ensuring satisfactory access (**MM6** and **MM7**) I find that this Policy is sound.

### **Policy SER9 West Great Waking**

33. Sites SER9a and SER9b are both well located to access the existing facilities at Great Waking. There is existing development on 3 sides of Site SER9a which would occupy an 'indent' in the settlement boundary and it is therefore a logical extension. Site SER9b would be contained by the High Street and the Local Wildlife Site to the south and would therefore be discrete in terms of landscape impact and have a good relationship with existing housing. The text regarding vehicular access should, however, be modified in the interests of effectiveness to confirm that Site SER9b should be accessed from Star Lane via Site BFR1 but that this matter could be determined at the planning application stage (**MM79** and **MM80**). There is no need for the policy to be any more prescriptive.
34. With this caveat and with the other modifications referred to in paragraph 27 I consider that Policy SER9 is sound. The suggested expansion of Site SER9b to include land to the west of Alexandra Road (part of Option WG3) would not be sound due to its ecological value as identified by the Essex Wildlife Trust<sup>12</sup>.

### **Policy NEL3 South of Great Waking**

35. CS Policy ED4 indicates that a strategically located employment park should be allocated to the south of Great Waking to provide local employment. The proposed site to the south of Site BFR1 would be physically detached from the edge of the settlement and would appear wholly incongruous in the flat, open landscape. The adverse impact of an isolated nucleus of development on the openness and purposes of the Green Belt would be very marked. Furthermore, it would rely on the creation of a defensible boundary on 3 sides and would create a gap where there is likely to be pressure for further development or 'infilling' in due course.
36. These negative aspects could be overcome by an alternative site immediately adjacent to the new boundary of Great Waking created by Site BFR1. As a result employment uses would be brought closer to the residential development proposed on the former brickworks and also to the Local Wildlife Site. However, there is no evidence that a separation of 140m is essential to protect either residential living conditions or biodiversity interests. Similar relationships exist or would exist between current and proposed developments in Great Waking. There is also already a belt of woodland to the south of the footpath which could act as a buffer.
37. It is uncertain whether there will be a need to accommodate businesses displaced from Star Lane Industrial Estate but this possibility should be allowed for in line with CS Policy ED4 (**MM89**). Paragraph 5.61 of the Plan should be amended to encompass Class B2 uses (**MM94**) but within a site of 3.2ha there is scope for such uses to be located away from future residential

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<sup>12</sup> Appendices 10 & 11 of Council's hearing statement (Document EXA126)

properties on Site BFR1. One access to and from the site onto Star Lane would be unlikely to lead to a proliferation but the potential to utilise the existing access to the Local Wildlife Site is a matter that could be explored (**MM95**). Other modifications are necessary to reflect the implications of the new site in terms of access and highway considerations (**MM96** and **MM97**).

38. The site originally shown in Figure 22 is therefore not sound as it is not justified compared to the reasonable alternative of a site further north and abutting Site BFR1. As Option E19 this site performed strongly against sustainability objectives according to the Updated SA<sup>13</sup>. Other alternatives raised are not sound. The land at Tithe Park (Options E23 and E24) is too remote from Great Wakering and land to the west of Site SER9a would intrude significantly into the Green Belt.
39. On the basis of the revised site for Site NEL3 (**MM87, MM88, MM89, MM91, MM92** and **MM93**) and the other modifications required to make it effective, this Policy is sound.

## Rayleigh

### Policy BFR4 Rawreth Industrial Estate, Rayleigh

40. The latest Viability Study<sup>14</sup> indicates that development here would not be viable if 35% affordable housing were provided in full compliance with CS Policy H4 but that a 'breakeven' position might be achieved if this were reduced to around 20%. However, it also notes that securing vacant possession would be a major exercise especially as some firms have recently invested in their premises and that suitable secondary stock may not be available for re-location. Because of issues of viability it is accepted that Site BFR4 should not be included in the 5 year housing land supply.
41. Moreover, it is assumed that there are no current or latent contamination issues but having regard to the nature of the existing uses this may not be the case. It is expected that the site could deliver 222 dwellings which equates to 60 dwellings per hectare based on a developable area of about 60% or 35 dwellings per hectare across the entire site. This does not seem unreasonable even allowing for the need for open space, drainage and landscaping. However, there is no specific site promoter and whether the Council would resort to a Compulsory Purchase Order is uncertain. Even though the Economic Development Unit may be committed to assist the likelihood of development being delivered during the Plan period should therefore be treated with a degree of caution.
42. Nevertheless the redevelopment of the Rawreth Lane Industrial Estate is included within CS Policy H1 following the identification of poor quality stock in the Employment Land Study of 2008<sup>15</sup>. Policy BFR1 is therefore consistent with the CS in broad terms. Although there is some doubt as to whether the site will come forward for housing during the Plan period economic conditions

<sup>13</sup> Evidence Base Document 67.EB18

<sup>14</sup> Appendix 3 of Council's Hearing Statement (Document EXA126)

<sup>15</sup> Evidence Base Documents 54.EB5 & 54.EB5A

may change so there is some prospect of deliverability. I therefore consider that the Policy is sound subject to the modifications previously referred to.

### **Policy SER1 North of London Road, Rayleigh**

43. I have explained in paragraphs 16 and 17 that this allocation is sound in principle since it is consistent with the CS. Policy H2 specifically refers to 550 dwellings in this location between 2015 and 2021.
44. Any development to the west of Rayleigh would result in new buildings on open fields where there are currently none. The site is gently sloping and development would be apparent from both Rawreth Lane and London Road as well as in longer views from the west. I understand that the 'green' setting of Rayleigh is valued by local people and the RASD would lead to a marked change. However, there is no evidence that the historic qualities of the town would be compromised or that any other location that corresponds to the description in the CS would have less of a landscape impact. It is therefore justified in this respect when judged against the reasonable alternatives.
45. Surveys undertaken in 2010 and 2013 indicate 12 hour vehicle flows along Rawreth Lane and London Road of 4,870 and 11,043 respectively<sup>16</sup>. As well as traffic from Site SER1 there will be additional trips to and from the houses under construction at the Eon site. During the hearing there was reference to congestion and "bottlenecks" and both routes were busy at the various times I visited. The point that adequate infrastructure should either be in place or put in place before development is committed is a reasonable one but that assessment was made as part of the CS examination.
46. The extra homes specified by CS Policy H2 have to go somewhere to the north of London Road and it seems sensible to divide the additional traffic between the two roads that link into the A1245. Further work would be done as part of a Transport Assessment accompanying a planning application. Put the other way, there is no technical evidence to demonstrate that the local road network would be overwhelmed and therefore that the proposed site is not acceptable.
47. Rawreth Brook crosses the site and 3.1ha in the centre is within Flood Zones 2 and 3 and at risk of flooding. This area is to be set aside for public open space as explained at paragraph 3.33 of the RASD and there are no objections from the Environment Agency. A Sustainable Drainage System would be required by paragraph 3.41 in order to prevent any increase in surface water run-off. Although there was serious flooding in Rayleigh in August 2013 there is nothing to indicate that development would make this more likely to re-occur. There are no objections from relevant authorities in relation to sewage disposal. There is no evidence that the allocation would lead to a deterioration in air quality within an Air Quality Management Area. Policy SER1 also includes details of the infrastructure, services and facilities that would need to be accommodated including a new primary school.
48. Modifications are, however, needed in a number of respects to make the policy effective. Firstly, the distribution of traffic between Rawreth Lane and London

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<sup>16</sup> Appendix 21 of Document EXA132

Road should be left to a detailed assessment since there is no evidence that the majority should be from London Road (**MM25**). It should be clarified that the green buffer would not extend to the A1245 but that existing agricultural land to the west would also be retained (**MM27**). Having regard to the views of Sport England the replacement sports facilities should be at least of an equivalent standard to the existing ones and the possibility of social events within the clubhouse should be mentioned (**MM28**). There is no evidence to support the figure of 340m as a minimum separation between the existing and new clubhouses although the location should be accessible to the local community and either within the site itself or the buffer zone to the west. The possibility of small retail units should be explored rather than insisted upon given that viability is unproven (**MM30**).

49. Finally, the site boundary in Figure 6 should be adjusted so that it follows the power lines to the west (**MM20, MM22 and MM29**). Although this would remove more land from the Green Belt it would provide a firm and obvious boundary and would not impinge on the setting of the listed building at Rawreth Hall. The alternative of moving the development boundary further to the west of the power lines would lead to the loss of an excessive amount of Green Belt land. Clearly the good practice guidance<sup>17</sup> about the proximity of residential accommodation to power lines would still apply but the additional strip could potentially be used for access roads, garaging or planting.
50. The site promoter observes that there is, at the very least, a strong likelihood that the new access road from London Road or to the new sports club site would need to be to the west of the pylons and therefore within the Green Belt. The NPPF encourages the enhancement of the beneficial use of the Green Belt by, for example, providing opportunities for outdoor sport and recreation. The provision of appropriate facilities for that purpose is not inappropriate development subject to certain caveats. On the other hand, given its likely scale, providing a new access road outside the defined area to serve residential development would be inappropriate development. This would be contrary to the intentions of the NPPF.
51. Whilst there is a need to ensure deliverability the starting point is that vehicular access from London Road should be provided within the development area in order to ensure consistency with national policy. The precise form of the junction is not known. On the basis of the evidence before me it is not impossible that an access could be formed within the site even allowing for the 'pinch point' with adjoining land and the proximity of the overhead lines. On further, detailed investigation it may transpire that part of any residential access would, for technical reasons, have to breach the Green Belt boundary and the Council is not opposed to highway access roads to the west of the pylons. However, for the purposes of the Plan, the focus should be on concentrating development and associated infrastructure within the newly created settlement boundary. In these circumstances paragraph 3.30 should be deleted (**MM26**) to comply with the NPPF.
52. The re-location of the existing Sports and Social Club involves the disposal of Council land. Any such transaction would have to be undertaken properly

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<sup>17</sup> Evidence Base Documents 86.EB37, 87.EB38 and 88.EB39

having regard to any trusts but does not go to the soundness of the RASD. Similarly, there is no need to include reference to future tenure and management agreements as requested by Sport England.

53. One representor lists a series of sites of different sizes many of which are brownfield and is critical of the Council's categorisation of these in the past<sup>18</sup>. However, the CS has already set a course and these options have been looked at in detail over some considerable time. Therefore, subject to the modifications highlighted in this Report, I consider that Policy SER1 is sound.

### **Policy NEL1 South of London Road, Rayleigh**

54. The allocation of this employment site to the south of London Road carries forward the principles of Policy ED4 of the CS. However, it is subject to a number of significant constraints. Firstly, existing businesses would be affected and any development would be limited by the power lines across the eastern half of the site. The example cited at Gravelly Industrial Park, Birmingham<sup>19</sup> does not show buildings below the overhead wires. The land would also be significantly detached from the existing and proposed built-up areas of Rayleigh and would therefore encroach into the Green Belt. Finally, there is no site promoter so that the deliverability of the site is highly questionable. Indeed, the Council accepted that it is an aspirational and long-term allocation to engender interest.
55. The replacement of the existing businesses at the Rawreth Lane Industrial Estate is far from imminent. Furthermore, it is proposed to allocate over 26ha of land through the London Southend Airport and Environs Joint Area Action Plan (JAAP) which at the time of the hearings was at an advanced stage prior to submission for examination. The RASD also allocates 8.8 ha of land to the west of the A1245 (Policy NEL2) for employment purposes. The Council proposes to delete Site NEL1 but the industrial land allocations of 18ha envisaged by Policy ED4 would still be achieved and its other aspirations could potentially be fulfilled by Site NEL2.
56. In my opinion Policy NEL1 is not deliverable and therefore ineffective and does not comply with national policy. Removing this site from the Plan (**MM82**, **MM83** and **MM84**) would also be consistent with the CS.

### **Policy NEL2 West of A1245, Rayleigh**

57. Michelins Farm is an area of degraded countryside with excellent links to the highway network owing to its proximity to the A127/A1245 junction (Fairglen Interchange). Its detachment from existing residential areas also means that it is well suited to accommodating heavier industrial uses. The Highway Authority is now satisfied that vehicular access can be devised to a suitable standard with a left in/left out diverge/merge junction. Its Supplementary Planning Guidance seeks to restrict intensified access onto Strategic Routes such as the A1245 as a matter of principle except where there is an overriding

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<sup>18</sup> Appendix 7 of Document EXA132

<sup>19</sup> Evidence Base Document 88.EB39 p21

need. The allocation of the land would fall into that category and so there are no longer highway objections.

58. The deletion of Site NEL1 means that Site NEL2 becomes the only new employment site in the west of the District. However, the site is sufficiently large to accommodate a range of uses provided that they are carefully planned, perhaps on a zonal basis. This is necessary to ensure effectiveness. The preference is that office development is directed to Rayleigh and Hockley through Area Action Plans but Site NEL2 could serve as a 'backstop' if suitable sites within these town centres cannot be identified. I find that Policy NEL2 is sound subject to the modification (**MM85**) regarding the location of uses.

## Hullbridge

### Policy SER6 South West Hullbridge

59. The CS makes provision for 500 dwellings in this location split equally between before and after 2021. Although many residents are opposed to the allocation and express concern, amongst other things, about the creation of a "whole new commuter town" the location and distribution of new housing across the District was established by the CS and the RASD is required to be consistent with it. Sites outside of Hullbridge that are mentioned as possible alternatives would therefore not be sound.
60. The projection of development to the west of Hullbridge would be minimised as far as possible and the site adjoins the existing settlement so that future residents would be close to existing facilities. Although some boundaries may not be strongly defined this could be addressed. Part of the site would be in Rawreth Parish even though it would be functionally related to Hullbridge. This might ultimately lead to a boundary review but does not make the detailed site boundaries inappropriate.
61. The site promoter has an option over the entire area apart from about 1ha in the north-west corner. This is a modest proportion of the entire site and would be likely to come forward at the end of the development process in any event. There are no land ownership or other constraints to indicate that the site is not deliverable. The sub-division of the allocated area into SER6a and SER6b is consistent with the CS so that the second phase is prevented until after 2021 although Policy H3 allows for Site SER6b to be brought forward if required to maintain an adequate housing land supply. Whether construction would be delayed by this split is uncertain but making the site areas less specific is necessary to allow for flexibility and effectiveness (**MM45**).
62. As indicated in paragraphs 22-25 the cumulative impact of traffic on Hullbridge arising from other permitted and proposed developments was taken into account in the CS. The Hullbridge Residents Action Group has undertaken a peak time survey<sup>20</sup> and a large number of properties would be affected by extra traffic. However, no assessment has been undertaken to show that local roads would be overloaded or that there would be significant harm to amenity.

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<sup>20</sup> Document EXA142

63. There is particular concern about Watery Lane which is narrow and twisting and provides a link to major routes to the north. It is apparent that there is a difference between the Highway Authority's view of its status within the road hierarchy and the actual level of use of a well-known 'short cut'. Watery Lane is also vulnerable to flooding but development would provide an opportunity for this to be mitigated. The concept statement should be modified to include reference to raising the highway and ditch maintenance to ensure satisfactory highway conditions (**MM52**). CS Appendix H1 and paragraph 3.188 of the RASD also refer to improvements to the Hullbridge Road junction which might involve a dedicated turning lane.
64. The site is not within an area of flood risk according to the Environment Agency. However, as well as Watery Lane, there is also evidence that Lower Road is subject to surface water flooding. A Sustainable Drainage System is required by paragraph 3.194 to prevent any increase in surface water run-off. This reflects the South Essex Surface Water Management Plan (Phase III)<sup>21</sup> which notes that Site SER6 can utilise source control measures to provide betterment in the existing surface water flooding within the Watery Lane Critical Drainage Area. In terms of sewage there is sufficient volumetric capacity at Rayleigh West Wastewater Treatment Works according to the Water Cycle Study<sup>22</sup> although an upgrade to the transmission network is required. Whilst local people may be sceptical there is no objection from any relevant authority or technical study on drainage or sewage grounds.
65. Other modifications are necessary to confirm that new facilities could be provided off-site (**MM45** and **MM50**) and to clarify the purpose of the green buffer along the eastern side of the site (**MM49**). This is to ensure that new development is satisfactorily integrated into the existing community so as to foster cohesion. Furthermore, the possibility of small retail units should be explored rather than insisted upon given that viability is unproven (**MM51**). All of these modifications serve to make the policy effective.
66. Site 17 (part of SWH4) on the southern side of Lower Road contains existing properties. A small area to the rear is within the residential boundary of the settlement as shown in the Local Plan of 2006. However, since the allocation in Policy SER6 is sound subject to the changes outlined above, there is no need to consider this alternative further.

## Canewdon

### Policy SER7 South Canewdon

67. The proposed allocation is divided between land to the west and to the east of Church Lane. Canewdon is a fairly compact village. The Grade II\* listed St Nicholas Church is very much a focal point at the western edge of the settlement. As well as its intrinsic architectural, artistic and historic interest it is a prominent feature visually in views towards Canewdon from various directions and also provides an 'end stop' to the settlement. The few existing buildings to the west are clearly distinct and sporadic.

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<sup>21</sup> Evidence Base Document 78.EB29

<sup>22</sup> Evidence Base Document 56.EB7A



68. The indicative layout shows a double row of 2-storey houses along Lark Hill Road at a lower level on the western side of the site. When seen from Scotts Hall Road and other vantage points to the south the church tower would retain its pre-eminence perched magisterially on top of the hill with buildings below it. However, the views from Lark Hill Road across the open field towards the church tower that are an important and distinctive component of Canewdon and the Canewdon Church Conservation Area would be interrupted. The strong and close relationship between the building and its immediate agrarian setting would also be broken. A harmful westerly spread of the settlement in a manner contrary to its form would result.
69. The harm to the setting of the heritage asset would not be outweighed by public benefits including the argument that provision of open space would better reveal its significance. Whilst taking account of the views of the County Council's experienced Historic Buildings and Conservation Consultant<sup>23</sup> the heritage asset would not be conserved in a manner appropriate to its significance. Furthermore, as the western side of the site would protrude into the Green Belt the allocation is inconsistent with national policy.
70. However, there are no such objections to the eastern side which is already in residential use. The site is being promoted through the Strategic Housing Land Availability Assessment 2012 – SHLAA Review<sup>24</sup>. The Council estimates that 49 dwellings would be viable and proposes to amend the RASD by deleting the section to the west of Church Lane and retaining the eastern site.
71. This would result in a density slightly in excess of 30 dwellings per hectare but not all the village comprises large houses in substantial plots and the number of dwellings is also expressed as an approximation. The proportion of affordable houses should be adjusted to reflect the revised target. Any development would be in the foreground of the church and the conservation area but would be much more obviously part of Canewdon. English Heritage raises no objection in principle and there are sufficient safeguards within the policy to ensure that the sensitivity of the location is respected.
72. More generally, CS Policy H2 provides that 60 dwellings should be provided at South Canewdon between 2015 and 2021 by means of an extension to the existing residential envelope. As such, deleting the western side would result in a shortfall. However, Policy H2 also states that the detailed location and quantum of development will be articulated within the Allocations Development Plan Document. As precise numbers are to be settled by the RASD and as the absolute change is modest in terms of overall supply, the revised, smaller allocation is consistent with the CS (**MM53, MM54, MM55, MM56, MM57, MM59, MM60, MM63, MM64, MM65, MM66, MM67, MM68, MM69** and **MM70**). Indeed, taking account of the detailed evidence regarding a larger site, Policy SER7, as modified, is justified and sound.
73. Another option canvassed was to have provided 11 units on land to the south in order to reach the total of 60 dwellings (Option SC1). However, this would result in a small group of buildings to the south of Anchor Lane breaking what

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<sup>23</sup> Appendix 9 of the Council's Hearing Statement (Document EXA126)

<sup>24</sup> Evidence Base Document 65.EB16

is currently a very clear edge to the village and requiring the creation of contrived boundaries. This possibility would therefore not have been sound.

### **Other Sites and Policies**

74. The other allocated housing and employment sites including Stambridge Mills, Rochford (Policy BFR3) are justified, deliverable within the plan period and consistent with national policy subject to the modifications described earlier. I therefore consider that they are sound.
75. The intentions for the Eldon Way/Foundry Industrial Estate site at Hockley in Policy BFR2 should be confirmed to ensure that it reflects the CS (**MM8**). The development area for Site SER3 in West Hockley should be adjusted to include vehicular access onto Folly Lane to make it sound (**MM36**). In the interests of clarity or accuracy and hence effectiveness a few other changes are necessary to various policies and figures (**MM98, MM100, MM101**).

### **Issue 3**

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

76. Policy H7 of the CS confirms that the Council will allocate 15 pitches for gypsies and travellers by 2018. In order to achieve consistency with the CS Policy GT1 provides for 15 pitches on a site of 1ha in the south-western corner of Michelins Farm immediately adjacent to Site NEL2. Representors make reference to 44 families but the proposed site is not large enough to accommodate that number. Neither is it my understanding that it is the same size as the site at Dale Farm in neighbouring Basildon.
77. The site is somewhat isolated from the settled community and therefore does not fully reflect the intention in the Planning Policy for Traveller Sites (PPTS) of achieving integration. Neither is it close to services and facilities including health care and schools although it would make effective use of untidy land. However, Policy H7 expects sites to be allocated in the west of the District and very few were put forward for consideration for this use. Of those, the land at Cherry Hill Farm has been the subject of unsuccessful appeals.<sup>25</sup> Some of the same objections to the allocation of employment land to the south of London Road in Policy NEL1 also apply to its possible allocation as a traveller site. Certainly neither of these options would be superior and the site selected is therefore justified when compared to other reasonable alternatives.
78. The scale of the site accords with advice in *Designing Gypsy and Traveller Sites: Good Practice Guide*<sup>26</sup> which refers to a capacity of up to 15 pitches. Some maintain that a single site would give rise to tensions between families but it is no part of Government policy that each family should have its own exclusive site. The Council cannot be faulted if groups or agents representing travellers largely failed to respond during the consultation process. It is confirmed that the Essex Countywide Traveller Unit agree in principle to manage a municipal site at Michelins Farm and capital funding is likely to be

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<sup>25</sup> Document EXA174

<sup>26</sup> Evidence Base Document 4.N4

available via the Homes and Communities Agency<sup>27</sup>. It is therefore reasonable to suppose that the site is deliverable.

79. The site is near to busy roads and would adjoin existing commercial uses at Annwood Lodge Business Park and the new construction worker training use. It would also border the employment activities on Site NEL2. However, there is no evidence that uses within Basildon are so disruptive that a traveller site could not co-exist with them if suitable attenuation measures such as bunding were undertaken. There is also scope for development on Site NEL2 to be planned so that any heavy industry is kept away from the traveller site and a separate access could also be devised. According to the Environment Agency there are localised pockets of contamination across Michelins Farm due to the unauthorised burning and depositing of waste<sup>28</sup>. Remediation may therefore be required but there is no evidence that this would be prohibitively expensive. Other regulatory controls apply to matters of air quality and dust.
80. One of the principles in the *Good Practice Guide* is that sites should not be identified in locations that are inappropriate for ordinary residential dwellings except in exceptional circumstances. In this regard there is a dwelling to the east that is near to the A127 and the Business Park. Whilst a location further from main roads and industrial processes might be preferable the existence of housing in close proximity provides confidence that with suitable planning the general health and well-being of future residents would be satisfactory. As referred to earlier the Highway Authority is content that vehicular access can be devised to a suitable standard onto the A1245 and the amount of extra traffic associated with 15 pitches would be insignificant.
81. No need for a site for travelling showmen was identified in the Gypsy and Traveller Accommodation Assessment in 2009<sup>29</sup> and Policy H7 contains no such requirement. A new assessment will inform the CS review but at the present time the absence of an allocation for showmen does not make the RASD unsound.
82. Although not a perfect fit I consider that Site GT1 is consistent with national policy having regard to the aim in the PPTS of increasing the number of traveller sites, addressing under provision and maintaining an appropriate level of supply. Policy GT1 is therefore sound.

#### **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?**

83. Confirmation of the protection of Local Wildlife Sites is necessary in the interests of effectiveness (**MM99**) and subject to this change the RASD is sound in respect of this issue.

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<sup>27</sup> Document EXA171

<sup>28</sup> Appendix 17 of Council's Hearing Statement (Document EXA126)

<sup>29</sup> Evidence Base Document 59.EB10A

**Issue 5**

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

84. Subject to one correction to reflect the deletion of Site NEL1 (**MM102**), Section 10 of the RASD clearly identifies potential risks, mitigation and monitoring measures primarily through the Annual Monitoring reports. This provides adequate assurance that policy delivery will be kept under review and that the RASD is likely to be effective.

## Assessment of Legal Compliance

85. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

<b>LEGAL REQUIREMENTS</b>	
Local Development Scheme (LDS)	The RASD is identified within the approved LDS of April 2013. Its content and timing are compliant with the LDS.
Statement of Community Involvement (SCI) and relevant Regulations	The SCI was adopted in January 2007 and consultation has been compliant with its requirements, including that on the Council's proposed changes.
Sustainability Appraisal (SA)	SA has been carried out, including SA of the Council's proposed changes, and is adequate.
Habitats Regulations Assessment (HRA)	The HRA has been carried out and is adequate and has been approved by Natural England.
National Policy	The RASD complies with national policy except where indicated and modifications are recommended.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS.
2004 Act (as amended) and 2012 Regulations.	The RASD complies with the Act and the Regulations.

## Overall Conclusion and Recommendation

86. The Plan has a number of deficiencies in relation to soundness which have been explained under the main issues set out above. This means that I recommend non-adoption of the Rochford Allocations Submission Document as submitted in accordance with Section 20(7A) of the 2004 Act.
87. The Council has requested that I recommend main modifications to make the Plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the Rochford Allocations Submission Document satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

*David Smith*

INSPECTOR

## Appendix – Main Modifications

The modifications below are expressed either in the conventional form of ~~strikethrough~~ for deletions and underlining for additions of text when paragraphs are amended or by specifying the modification in full.

The page numbers and paragraph numbering below refer to the submission RASD and do not take account of the deletion or addition of text.

Ref	Page	Policy/ Paragraph	Main Modification
MM1	16	2.11	<i>Replace sentence with the following:</i> The land allocated for development in accordance with this policy is identified in Figure 3.
MM2	17	2.13	A minimum of 87 dwellings should be provided across the site, of which at least 30 dwellings should be set aside as affordable housing units, <u>unless demonstrated to be unviable</u> , and should be provided 'tenure blind'. However, the expectation is that this site could deliver 131 dwellings as identified in the Strategic Housing Land Availability Assessment.
MM3	17	2.13	<i>Insert sentence below paragraph:</i> A masterplan or design brief would be expected to be submitted to the Council prior to the submission of a planning application for this site.
MM4	18	2.16	At least 0.6 hectares of public open space should be provided across the site. This calculation of need is based on a minimum of the provision of 87 dwellings. In the event a greater number are provided, the provision of public open space should increase, <u>unless demonstrated to be unviable</u> . This should take the form of natural/semi-natural greenspace <u>or Amenity greenspace should also be provided across the site</u> . Conditions will be attached to ensure that any greenspace provided has ecological value. In addition, a landscape strategy promoting green links and biodiversity corridors should be prepared for the site. <u>If demonstrated to be unviable, off-site provision, or improved access to existing open space should be considered.</u>
MM5	18	2.17	At least a local area for play (LAP) on a minimum of 0.01 hectares should be provided on the site, <del>but</del> <u>Developers should also look to provide local equipped areas for play (LEAP) and/or neighbourhood equipped</u>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>areas for play (NEAP) which require a minimum of 0.04 hectares and 0.1 hectares respectively, <u>although these may be provided off-site</u>. These areas should be well located within the development so that they are open, welcoming, safe and easily accessible from pedestrian routes, and within an appropriate walking time. The play spaces should be suitably landscaped and visible from nearby dwellings or well used pedestrian routes. In general, the design of these should follow the principles established by Fields in Trust and Play England.</p>
MM6	18	2.19	<p>The road to the south of the industrial estate (which is located within the Green Belt) provides access/egress to the adjacent Local Wildlife Site which would need to be considered. Development of the site should not restrict existing vehicular/pedestrian access/egress to the Local Wildlife Site. <del>However, the potential to utilise the existing access/egress for the Local Wildlife Site (which is in the Green Belt) to enable a combined access/egress point for these development should be explored.</del></p>
MM7	20	2.33	<p>Development to the east of Star Lane and to the south of the High Street (Policy SER9b, <u>and BFR1 and NEL3</u>) should be comprehensively planned to enable integration between these <del>different land uses</del> <u>sites</u> when they are delivered. One access/egress point onto Star Lane to serve these developments should be carefully considered at the planning application stage to avoid a proliferation of access/egress roads along Star Lane. Access/egress to the land within Policy SER9b <u>from Star Lane</u> should not go through the Local Wildlife Site but should be provided to the north east corner of the southern section (the former brickworks) if delivered prior to the northern section. Any impact on the existing footpath (from Star Lane eastwards to Alexandra Road) would also need to be considered.</p>
MM8	23	2.53	<p><u>This site will no longer be retained for employment use, but will instead be allocated for a range of uses including residential, employment, leisure and retail in accordance with Core Strategy Policy RTC6.</u> The detailed policies for this site and the wider central area of Hockley, based on the above principles, will be set out in the Hockley Area Action Plan.</p>
MM9	24	2.62	<p><i>Replace sentence with the following:</i> The land allocated for development in accordance with this policy is identified in Figure 4.</p>

Ref	Page	Policy/ Paragraph	Main Modification
MM10	25	2.64	A minimum of 41 dwellings should be provided across the site, of which at least 14 dwellings should be set aside as affordable housing units, <u>unless demonstrated to be unviable</u> , and should be provided 'tenure blind'. However, the expectation is that this site could deliver 98 dwellings as identified in the Strategic Housing Land Availability Assessment.
MM11	25	2.64	<i>Insert sentence below paragraph:</i> A masterplan or design brief would be expected to be submitted to the Council prior to the submission of a planning application for this site.
MM12	25	2.67	A minimum of 0.3 hectares of publicly accessible natural/semi-natural greenspace and amenity greenspace should be provided on-site, <u>unless demonstrated to be unviable</u> . Conditions will be attached to ensure that any greenspace provided has ecological value. A landscape strategy promoting green links and biodiversity corridors should be prepared for the site. <u>If demonstrated to be unviable, off-site provision, or improved access to existing open space should be considered.</u>  At least a local area for play (LAP) on a minimum of 0.01 hectares should be provided on the site, <del>but</del> <u>Developers should also</u> look to provide local equipped areas for play (LEAP) and/or neighbourhood equipped areas for play (NEAP) which require a minimum of 0.04 hectares and 0.1 hectares respectively, <u>although these may be provided off-site</u> . These areas should be well located within the development so that they are open, welcoming, safe and easily accessible from pedestrian routes, and within an appropriate walking time. The play spaces should be suitably landscaped and visible from nearby dwellings or well used pedestrian routes. In general, the design of these should follow the principles established by Fields in Trust and Play England.
MM13	28	2.91	<i>Replace sentence with the following:</i> The land allocated for development in accordance with this policy is identified in Figure 5.
MM14	29	2.93	Development of this site should deliver a minimum of 89 dwellings, which should provide at least 31 'tenure blind' affordable housing units, <u>unless demonstrated to be unviable</u> . However, the expectation is that this site could deliver 222 dwellings as identified in the Strategic Housing Land Availability Assessment.



Ref	Page	Policy/ Paragraph	Main Modification
MM15	29	2.93	<i>Insert sentence below paragraph:</i> A masterplan or design brief would be expected to be submitted to the Council prior to the submission of a planning application for this site.
MM16	30	2.104	The site should accommodate a minimum of 0.6 hectares of natural/semi-natural greenspace, which should be publicly accessible and integrated into the development, <u>unless demonstrated to be unviable</u> . This area of public open space may be provided to the south west of the site (where there is a small area at risk of flooding). Conditions will be attached to ensure that any greenspace provided has ecological value. <u>In addition, a landscape strategy promoting green links and biodiversity corridors should be prepared for the site. If demonstrated to be unviable, off-site provision, or improved access to existing open space should be considered.</u>
MM17	30	2.106	At least a local area for play (LAP) on a minimum of 0.01 hectares should be provided on the site, <del>but</del> <u>Developers should also look to provide local equipped areas for play (LEAP) and/or neighbourhood equipped areas for play (NEAP) which require a minimum of 0.04 hectares and 0.1 hectares respectively, although these may be provided off-site.</u> These areas should be well located within the development so that they are open, welcoming, safe and easily accessible from pedestrian routes, and within an appropriate walking time. The play spaces should be suitably landscaped and visible from nearby dwellings or well used pedestrian routes. In general, the design of these should follow the principles established by Fields in Trust and Play England.
MM18	34	3.10	This chapter details policies for settlement extensions to the residential envelope. It sets out the context for each site including on-site constraints and other factors which would need to be considered during development of the site. The minimum dwelling requirement for each location, <del>as per the Core Strategy, plus an allowance of 5% if required, demonstrating the flexibility of the settlement extension as required by national policy</del> is set out <u>in Policies SER1-9.</u>
MM19	34	3.12	<i>Insert sentence:</i> <u>A defensible Green Belt boundary is one which protects the openness and character of the area, prevents urban sprawl and is defined by permanent, easily recognisable</u>

Ref	Page	Policy/ Paragraph	Main Modification
			<u>features, where possible.</u>
MM20	35	3.17	The Core Strategy (Policy H2) identifies that the site in this general location should have the capacity to accommodate a minimum of 550 dwellings during the plan period. The site identified in Figure 6 is capable of providing 550 dwellings at a density of 30 dwellings per hectare, <del>plus a flexibility allowance of 5%, if required.</del> The overall site area is <del>38.8</del> <u>47.5</u> hectares to take account of site constraints and to accommodate the following infrastructure, services and facilities:
MM21	35	3.18	<i>Insert sentence:</i> The land allocated for development in accordance with this policy is identified in Figure 6.
MM22	36	Figure 6	<i>Replace figure for SER1 with the new site boundary as shown in Plan 1 of this Appendix.</i>
MM23	36	3.20	<i>Delete paragraph.</i>
MM24	37	3.20	<i>Insert sentence below paragraph:</i> A masterplan or design brief would be expected to be submitted to the Council prior to the submission of a planning application for this site.
MM25	37/38	3.27	At least two vehicular access/egress points onto and off the site for vehicular traffic should be provided from Rawreth Lane and London Road; <u>at least one point should link to Rawreth Lane and at least one point should link to London Road.</u> <del>The site should be configured such that the majority (in the region of two thirds) of dwellings are accessed from London Road.</del> The potential to provide a circular link <u>within the development area</u> with one strategic access point and one secondary access point onto London Road should be explored. A bus link will be created between Rawreth Lane and London Road (see Figure 7). However, the road layout within the site <del>will</del> <u>should be</u> such that there is no link for private cars between Rawreth Lane and London Road through the site. This could take the form of bus gates, cameras, and/or other forms of engineering to ensure that the relevant section of road is only suitable for buses. This should be determined at the planning application stage in consultation with the relevant bus company and the local highways authority. In addition a Traffic Regulation Order would be required to restrict movement for other road users along this route. However, a link between London Road and

Ref	Page	Policy/ Paragraph	Main Modification
			Rawreth Lane for all forms of transport may be explored. The route should be such that it would not encourage its use as a 'through-route' between Rawreth Lane and London Road. The options for this site, <u>including the distribution of traffic between Rawreth Lane and London Road,</u> should be explored in consultation with Essex County Council highways.
MM26	39	3.30	<i>Delete paragraph.</i>
MM27	39	3.35	In addition an area of greenspace should be provided to the west of the site which will act as a buffer between residential development and the A1245. It will not form part of the development area but will be situated in the Green Belt to the west of the residential settlement. The green buffer should take the form of parkland which is publicly accessible and integrated into the development <u>with the remaining land to the west retained in agricultural use.</u> Allotments may also be accommodated <u>within the development area to the east of the pylons</u> <del>the green buffer to the west on an</del> additional 0.3 hectares.
MM28	40	3.38	The playing field to the south of the site along London Road should be relocated. A replacement sports field with new ancillary facilities together with a new club house will be required to be provided ahead of any removal of the existing facility so as to ensure the continued and uninterrupted operation of this valuable community facility. The replacement facilities provided should <u>be of at least an equivalent standard and should take into consideration the findings of the Playing Pitch Strategy.</u> The new structure will be required to be built to the BREEAM (Very good) standard thus providing a new, efficient and environmentally friendly establishment which will be of great advantage to the community as a whole and to the operators of the Sports and Social club. <u>The replacement facilities will be expected to be built in a location which is accessible to the local community, whilst allowing for social events within the club house, and</u> <del>It should be located within the green buffer to the west of the site, although the arrangement of the facility should be such that the clubhouse and associated development are positioned adjacent to the residential settlement to the east and integrated into the development. The new clubhouse will be expected to be built within 340 metres of the existing location and will be served by a new road. However, an alternative location within the vicinity may be acceptable if this is shown to be more appropriate.</del>

Ref	Page	Policy/ Paragraph	Main Modification
			<del>Additionally this facility should be well connected to the pedestrian and cycling network. It should either be located within the green buffer to the west of the site or within the development area. However, t</del> The siting and design of the relocated facility should be determined in consultation with Sport England.
MM29	40	3.42	There are <u>high voltage pylons lines</u> running north eastwards <del>directly to the west of</del> <u>along the western boundary of the site.</u> , however, <del>Whilst the site follows the pylon line along its south western boundary,</del> residential development of this site will be further than <del>60</del> 30 metres from these. Siting of the replacement playing field and associated facilities (including car parking) should take into consideration the presence of the pylons <u>if located in the green buffer to the west of the site.</u> The alignment of the residential boundary in this location is such that it follows <del>natural</del> <u>existing features and would be defensible.</u> <del>where possible and would facilitate the creation of a multi-use junction for this site and that within Policy NEL1 along London Road.</del>
MM30	41	3.47	<i>Replace paragraph with the following:</i> The provision of small-scale retail (A1) units in the form of neighbourhood shops should be explored at the planning application stage, and if considered to be viable, they should be well designed, planned and integrated into the development of the site.
MM31	42	3.53	The Core Strategy (Policy H2) identifies that the site in this general location should have the capacity to accommodate a minimum of 600 dwellings during the plan period. The site identified in Figure 8 is capable of providing 600 dwellings at a density of 30 dwellings per hectare, <del>plus a flexibility allowance of 5%, if required.</del> The overall site area is 28.5 hectares to take account of site constraints and to accommodate the following infrastructure, services and facilities:
MM32	43	3.54	<i>Insert sentence:</i> The land allocated for development in accordance with this policy is identified in Figure 8.
MM33	43	3.56	<i>Delete paragraph.</i>

Ref	Page	Policy/ Paragraph	Main Modification
MM34	47	3.86	The Core Strategy (Policy H2) identifies that the site in this general location should have the capacity to accommodate a minimum of 50 dwellings during the plan period. The site identified in Figure 9 is capable of providing 50 dwellings at a density of 30 dwellings per hectare, <del>plus a flexibility allowance of 5%, if required.</del> The overall site area is 2.5 hectares to take account of site constraints and to accommodate the following infrastructure, services and facilities:
MM35	47	3.87	<i>Insert sentence:</i> The land allocated for development in accordance with this policy is identified in Figure 9.
MM36	48	Figure 9	<i>Replace figure for SER3 with the new site boundary as shown in Plan 2 of this Appendix.</i>
MM37	48	3.89	<i>Delete sentence.</i>
MM38	51	3.113	The Core Strategy (Policy H2) identifies that the site in this general location should have the capacity to accommodate a minimum of 175 dwellings during the plan period. The site identified in Figure 10 is capable of providing 175 dwellings at a density of 30 dwellings per hectare, <del>plus a flexibility allowance of 5%, if required.</del> The overall site area is 11.2 hectares to take account of site constraints and to accommodate the following infrastructure, services and facilities:
MM39	52	3.114	<i>Insert sentence:</i> The land allocated for development in accordance with this policy is identified in Figure 10.
MM40	53	3.116	<i>Delete sentence.</i>
MM41	56	3.141	The Core Strategy (Policy H2) identifies that the site in this general location should have the capacity to accommodate a minimum of 100 dwellings during the plan period. The site identified in Figure 11 is capable of providing 100 dwellings at a density of 30 dwellings per hectare, <del>plus a flexibility allowance of 5%, if required.</del> The overall site area is 5.5 hectares to take account of site constraints and to accommodate the following infrastructure, services and facilities:
MM42	56	3.143	<i>Insert sentence:</i> The land allocated for development in accordance with this policy is identified in Figure 11.

Ref	Page	Policy/ Paragraph	Main Modification
MM43	57	3.145	<i>Delete sentence.</i>
MM44	60	3.168	The Core Strategy (Policy H2 and H3) identifies that the site in this general location should have the capacity to accommodate a minimum of 500 dwellings during the plan period. The site identified in Figure 12 is capable of providing 500 dwellings at a density of 30 dwellings per hectare, <del>plus a flexibility allowance of 5%, if required.</del> The overall site area is 23.4 hectares to take account of site constraints and to accommodate the following infrastructure, services and facilities:
MM45	61	3.170	<del>The first phase shown as SER6a is 13.6 hectares in area, which is larger than the second phase — SER6b (9.8 hectares). The first phase is likely to be larger than the second, as per Figure 12.</del> <u>This would which could enable the first phase to accommodate facilities and open space to accompany the development as a whole. As such, the developable area for residential development on SER6a could be is likely to be nearer 50% of the entire site. However, the provision of facilities off-site may be considered appropriate provided they are well planned, meet local need, are fit-for-purpose and are accessible to the local community. This should be determined in consultation with the Council and the local community.</u>
MM46	61	3.171	<i>Insert sentence:</i> The land allocated for development in accordance with this policy is identified in Figure 12.
MM47	62	3.173	<i>Delete sentence.</i>
MM48	62	3.173	<i>Insert sentence below paragraph:</i> A masterplan or design brief would be expected to be submitted to the Council prior to the submission of a planning application for this site.
MM49	63	3.178	Trees and hedges should be developed in garden areas along the northern, eastern and southern boundaries of the site in both phases, as appropriate, to create a green buffer in perpetuity between new and existing development. <u>The purpose of the buffer is to protect residential amenity and privacy,</u> whilst promoting integration. Amenity greenspace (at least 0.4 hectares) should also be integrated into the development.
MM50	64	3.181	Youth, community and leisure facilities should accompany the development of these sites. Such

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>facilities may be provided within the first phase of the development (Policy SER6a) and should be well-integrated into this phase and enable integration with both the second phase of development (Policy SER9b) and residential development to the east to ensure that facilities are accessible to the local community. However, the provision of facilities off-site may be considered appropriate provided they are well planned, meet local need, are fit-for-purpose and are accessible to the local community. This should be determined in consultation with the Council and the local community.</u></p>
MM51	64	3.186	<p><i>Replace paragraph with the following:</i></p> <p>The provision of small-scale retail (A1) units in the form of neighbourhood shops should be explored at the planning application stage, and if considered to be viable, they should be well designed, planned and integrated into both phases of the development.</p>
MM52	65	3.188	<p>Alongside the first phase of development (Policy SER6a), local highway capacity and infrastructure improvements, including improvements to Watery Lane and Watery Lane/Hullbridge Road junction should be made. Further appropriate improvements should be made to accompany the second phase (Policy SER6b) where necessary. <u>Improvements to Watery Lane should include, but are not limited to, consideration of raising the level of the highway and improved drainage maintenance.</u></p>
MM53	66	3.199	<p>This site <del>identifies two areas</del> <u>is situated</u> to the east and west of the lane providing access to Canewdon Hall Farm and St Nicholas Church <u>to the north of Anchor Lane</u>. It is <del>predominantly a mix of greenfield land with some and previously developed land to the north of Anchor Lane and Lark Hill Road</del>, and is located adjacent to the existing residential area along its eastern boundary.</p>
MM54	66	3.200	<p>The Canewdon Church Conservation Area abuts the site along its <u>northern</u> <del>eastern</del> boundary.</p>
MM55	66	3.201	<p>There are two entrances to <del>the eastern part</del> of the site providing access to two existing dwellings from Anchor Lane. It is bounded by roads to the south and west, residential development to the east and greenfield land to the north (where the Conservation Area begins).</p>

Ref	Page	Policy/ Paragraph	Main Modification
MM56	66	3.202	<i>Delete sentence.</i>
MM57	67	3.205	The Core Strategy (Policy H2) identifies that the site in this general location should have the capacity to accommodate a minimum of 60 dwellings during the plan period. The site identified in Figure 13 is capable of providing <del>60</del> <u>approximately 49</u> dwellings at a density of 30 dwellings per hectare, plus a flexibility allowance of 5%, if required. The overall site area is <del>2.4</del> <u>1.5</u> hectares to take account of site constraints and to accommodate the following infrastructure, services and facilities:
MM58	67	3.206	<i>Insert sentence:</i> The land allocated for development in accordance with this policy is identified in Figure 13.
MM59	68	Figure 13	<i>Replace figure for SER7 with Plan 5 of this Appendix.</i>
MM60	68	3.207	Development of this site should provide <del>60</del> <u>approximately 49</u> dwellings, of which at least <del>21</del> <u>17</u> should be provided as 'tenure blind' affordable housing units. The site will accommodate no more than <del>60</del> <u>49</u> dwellings, unless it can be demonstrated that:
MM61	68	3.208	<i>Delete sentence.</i>
MM62	68	3.208	<i>Insert sentence below paragraph:</i> A masterplan or design brief would be expected to be submitted to the Council prior to the submission of a planning application for this site.
MM63	69	3.211	<i>Delete paragraph.</i>
MM64	69	3.213	<del>Lower density towards the western section of the site may be appropriate, given the sensitive topography.</del> Given the sensitive topography, development in this location should be well landscaped as well as sensitive to the neighbouring properties along the eastern boundary of the site.
MM65	69	3.213	Trees and hedges should be developed in garden areas along the northern, <del>western</del> and <u>eastern southern</u> boundaries of the site to create a green buffer in perpetuity between new and existing development, whilst promoting integration.
MM66	69	3.217	<i>Delete sentence.</i>
MM67	70	3.218	The development should also be appropriately designed and landscaped taking into consideration the Canewdon



Ref	Page	Policy/ Paragraph	Main Modification
			Church Conservation Area to the north/ <del>north-east</del> of the site. Listed Buildings in proximity to the site, in particular the grade II* listed 'Church of St Nicholas, High Street, Canewdon' and grade II listed 'The Vicarage, High Street, Canewdon' located to the north/ <del>north-east</del> of the site, <del>and the grade II listed 'White House Farmhouse, Lark Hill Road, Canewdon'</del> would need to be taken into consideration at the planning application stage. The detailed design and layout of development must ensure there is no adverse impact on the setting of these listed buildings. In particular, proposals should take into consideration English Heritage's guidance 'The Setting of Heritage Assets'.
MM68	70	3.221	The above calculations of greenspace and play space requirements are based on <del>6049</del> dwellings being provided on the site. If a greater number are provided, the provision of such facilities should increase proportionately.
MM69	70	3.223	Links and enhancements to local pedestrian/cycling and bridleway network, particularly as there is no footpath to the south of the site along <del>Lark Hill Road and Anchor Lane</del> , will be required.
MM70	70	3.225	Attenuation and source control Sustainable Drainage Systems (SUDS) of a size proportionate to the development should be used such as balancing ponds, swales, detention basins and green roofs. <del>These could be incorporated into the greenspace provided on and/or adjacent to the site.</del> Consideration would need to be given to the potential impact of certain types of SUDS on below ground archaeology. Appropriate SUDS should be determined in consultation with Essex County Council and the Environment Agency. A site specific flood risk assessment incorporating a surface water drainage strategy should be prepared for the site.
MM71	71	3.232	The Core Strategy (Policy H3) identifies that the site in this general location should have the capacity to accommodate a minimum of 500 dwellings during the plan period. The site identified in Figure 14 is capable of providing 500 dwellings at a density of 30 dwellings per hectare, <del>plus a flexibility allowance of 5%, if required.</del> The overall site area is 23.5 hectares to take account of site constraints and to accommodate the following infrastructure, services and facilities:

Ref	Page	Policy/ Paragraph	Main Modification
MM72	72	3.234	<i>Insert sentence:</i> The land allocated for development in accordance with this policy is identified in Figure 14.
MM73	73	3.236	<i>Delete sentence.</i>
MM74	73	3.236	<i>Insert sentence below paragraph:</i> A masterplan or design brief would be expected to be submitted to the Council prior to the submission of a planning application for this site.
MM75	76-77	3.267	The Core Strategy (Policy H3) identifies that the sites in this general location should have the capacity to accommodate a minimum of 250 dwellings during the plan period. The sites identified in Figure 15 are capable of providing 250 dwellings at a density of 30 dwellings per hectare, <del>plus a flexibility allowance of 5%, if required.</del> The overall site area is 13 hectares to take account of site constraints and to accommodate the following infrastructure, services and facilities:
MM76	77	3.269	<i>Insert sentence:</i> The land allocated for development in accordance with this policy is identified in Figure 15.
MM77	78	3.271	<i>Delete sentence.</i>
MM78	79	3.271	<i>Insert sentence below paragraph:</i> A masterplan or design brief would be expected to be submitted to the Council prior to the submission of a planning application for these sites.
MM79	81	3.288	<del>At least one point of access/egress onto the highway network may will be required for each site. depending on the distribution of dwellings between them. This should be determined in consultation with the local highway authority. Connection to the highway network for the site to the west of Little Wakering Road (Policy SER9a), may be provided to the north onto Barrow Hall Road and/or to the south onto Southend Road. In particular, the site to the south of the High Street (Policy SER9b) should connect the High Street and, provided be appropriately integrated, is enabled between this site and with the land within Policy BFR1, so that access/egress from with Star Lane to the west to serve the development of BFR1 also provides access/egress to SER9b. Access/egress to the High Street from SER9b may also be explored as an addition</del>

Ref	Page	Policy/ Paragraph	Main Modification
			<u>or alternative to an access/egress via BFR1 to Star Lane</u> . However, <del>this should be the precise detail in terms of the number and location of access/egress points for SER9a and SER9b</del> will be determined at the planning application stage in consultation with the local highway authority.
MM80	81	3.290	Development to the east of Star Lane and to the south of the High Street (Policy SER9b, <u>and BFR1 and NEL3</u> ) should be comprehensively planned to enable integration between these <del>different land uses</del> <u>sites</u> when they are delivered. One access/egress point onto Star Lane to serve these developments should be carefully considered at the planning application stage to avoid a proliferation of access/egress roads along Star Lane. Access/egress to the land within Policy SER9b <u>from Star Lane</u> should not go through the Local Wildlife Site but should be provided to the north east corner of the southern section (the former brickworks), if delivered prior to the northern section. Any impact on the existing footpath (from Star Lane eastwards towards Alexandra Road) would also need to be considered.
MM81	84	3.312	<i>Insert sentence:</i> The land allocated for development in accordance with this policy is identified in Figure 16.
MM82	92	5.2	<i>Delete paragraph.</i>
MM83	92	5.3	New employment land to the west of Rayleigh will accommodate businesses displaced from Rawreth Industrial Estate <del>as well as providing some additional office space. Given the varying nature of some of the businesses on the industrial estate (heavy industry, waste transfer etc.) it is appropriate to allocate two sites to the west of Rayleigh.</del>
MM84	92-96	Policy NEL1	<i>Delete policy.</i>
MM85	97	5.33	The site is able to accommodate heavier industry and waste transfer businesses displaced from Rawreth Industrial Estate. There is also capacity to accommodate a recycling facility (1.2 hectares). <u>The broad location of uses within the development site should be addressed through a masterplan or design brief.</u>

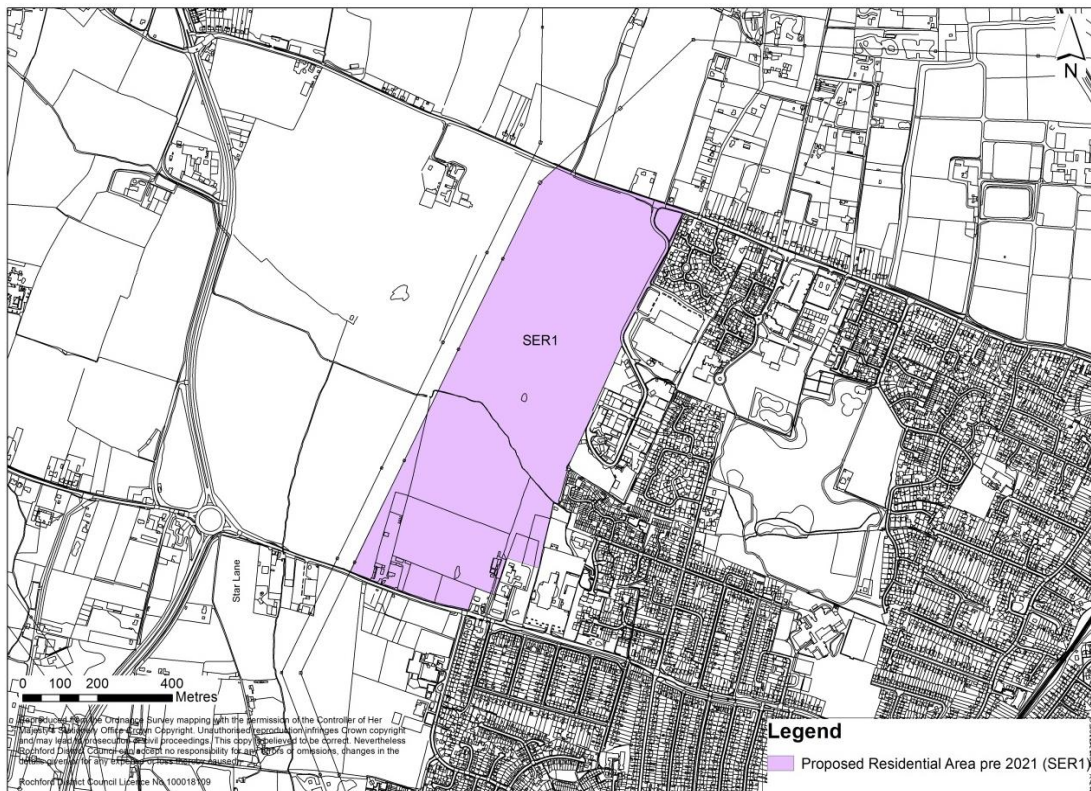
Ref	Page	Policy/ Paragraph	Main Modification
MM86	97	5.34	<i>Replace sentence with the following:</i> The land allocated for development in accordance with this policy is identified in Figure 20.
MM87	100	5.52	There are trees and hedgerows partially bounding the site to the <del>north and west</del> , and there is a Local Wildlife Site (R35 Star Lane Pits) is situated to the north/north east of the site.
MM88	101	5.53	An access road runs along the northern boundary of the site which provides vehicular access to the Local Wildlife Site. There is also a <u>belt of woodland and a public right of way</u> running through the northern section of the site.
MM89	101	5.54	The site is <del>2.53.2</del> hectares in size. Businesses displaced from Star Lane Industrial Estate, which excludes the part of the site encompassing the disused brickworks (Policy BFR1), <del>may will</del> be accommodated on this site.
MM90	101	5.55	<i>Replace sentence with the following:</i> The land allocated for development in accordance with this policy is identified in Figure 21.
MM91	102	Figure 22	<i>Replace figure for NEL3 with the site shown in Plan 4 of this Appendix.</i>
MM92	102-103	5.59	<del>The site's location 140 metres to the south of existing development in Great Wakering, allows for an adequate separation of industrial uses and residential uses to ensure residential amenity. The site follows an existing hedge line to the west and abuts the southern boundary of BFR1. It also encompasses the road to the Local Wildlife Site and a belt of woodland. However, with open fields to the north, south, and west east there is are no existing features which provide defensible Green Belt boundaries in these directions. As such, development of the site must be accompanied by significant landscaping to the north, south and east, creating a new Green Belt boundary. Significant landscaping will This would also be required to ensure visual impacts on the approach from the south along Star Lane and east along Poynters Lane are minimised.</del>
MM93	103	5.60	Such landscaped green buffers should be provided in the form of publicly accessible green space, with conditions attached to ensure that it has ecological value as a wildlife corridor. <del>To the north, the landscaping should incorporate non-vehicular links to ensure the site is well connected to Great Wakering.</del>

Ref	Page	Policy/ Paragraph	Main Modification
			Conditions will be attached to ensure that any greenspace provided has ecological value. <u>The road to the Local Wildlife Site and the belt of woodland to the north of NEL2 provide an important buffer between the residential development to the north (BFR1) and any employment uses on the site.</u> A landscape strategy promoting green links and biodiversity corridors should be prepared for the site.
MM94	103	5.61	The types of uses permitted on site should be B1 (business), <u>B2 (industrial)</u> and B8 (storage and distribution). <u>In considering the detailed layout of the site, consideration will be given to proximity to residential development to the north of the site and impact on residential amenity.</u> <del>and the</del> The site should not become a 'bad neighbour' through noise, dust, or smells.
MM95	103	5.64	<del>Development to the east of Star Lane and to the south of the High Street (Policy SER9b, BFR1 and NEL3) should be comprehensively planned to enable integration between these different land uses when they are delivered. One access/egress point onto Star Lane to serve these</del> <u>this</u> developments should be carefully considered at the planning application stage to avoid a proliferation of access/egress roads along Star Lane. The potential to utilise the existing access/egress for the Local Wildlife Site (which is in the Green Belt) to enable a combined-access/egress point for <del>these</del> <u>this</u> developments <u>should be explored.</u>
MM96	103	5.66	<i>Delete paragraph.</i>
MM97	103	5.68	Improvements to the Star Lane/Poynters Lane junction, <u>such as the creation of a new roundabout,</u> should be addressed through the redevelopment of the site <u>explored</u> at the planning application stage, <del>with the creation of a new roundabout, with new vehicular access to the site from the south to be considered in detail in conjunction</del> <u>consultation</u> with Essex County Council Highways Authority.
MM98	106	Figure 23	<i>Replace figure for NEL4 with Plan 3 of this Appendix.</i>
MM99	109	6.9	The location of the Local Wildlife Sites as identified by the 2007 Local Wildlife Sites Review, <u>which will be protected as such,</u> are shown in Figure 24.

Ref	Page	Policy/ Paragraph	Main Modification
MM100	111	6.13	Parts of the areas identified in Policy SER6 to the south west of Hullbridge and <del>Policy SER7 to the south of Canewdon</del> are situated in the Coastal Protection Belt. As such a small amendment to the Coastal Protection Belt designation in this location is required.
MM101	111	Figure 25	<i>Replace figure for the Coastal Protection Belt with Plan 6 of this Appendix.</i>
MM102	165	First row	<i>Delete first row of table.</i>

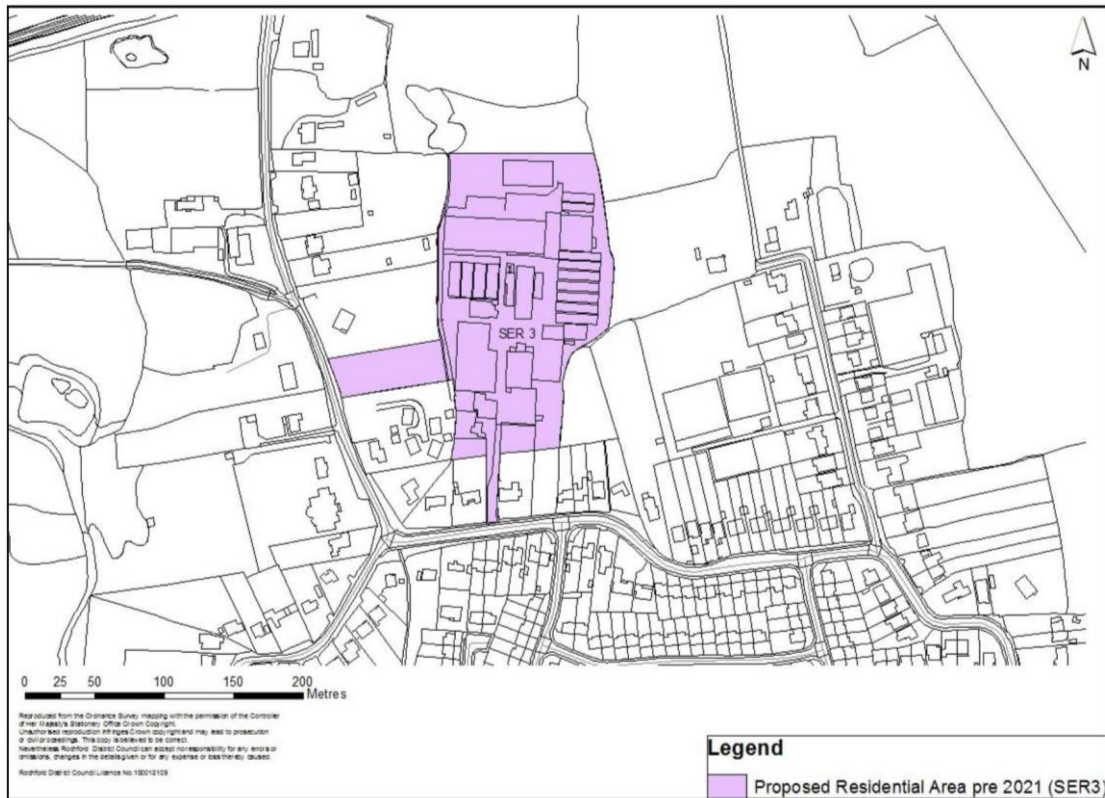
## Plans

### 1. Revised Site Boundary for SER1

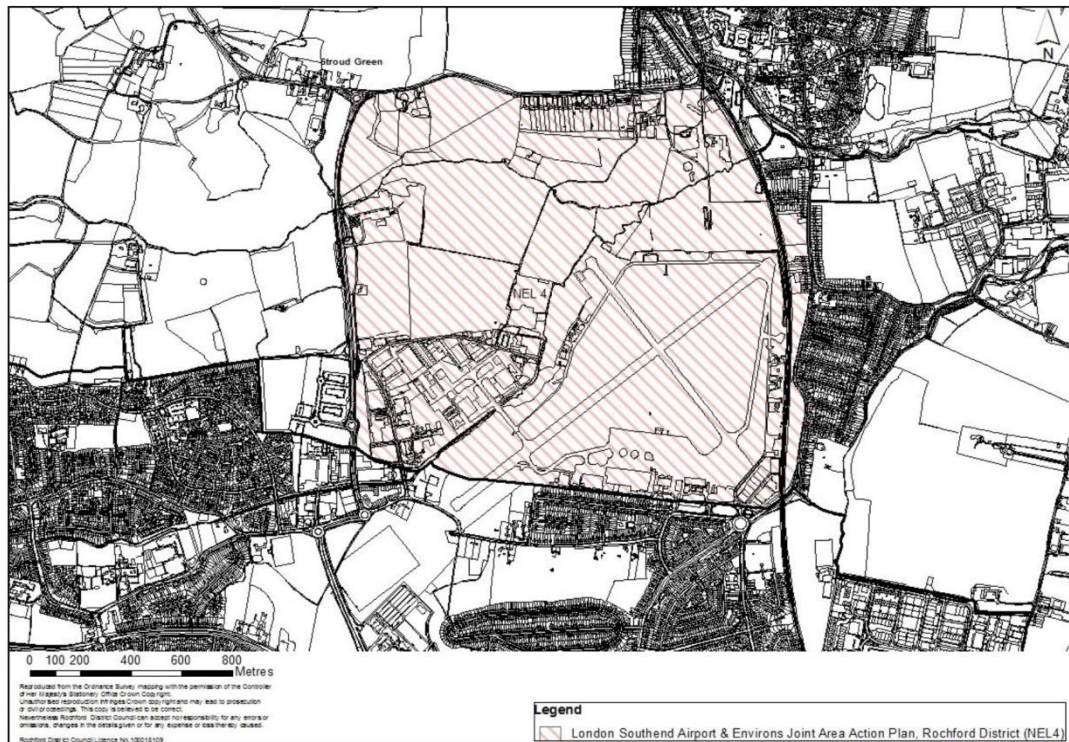




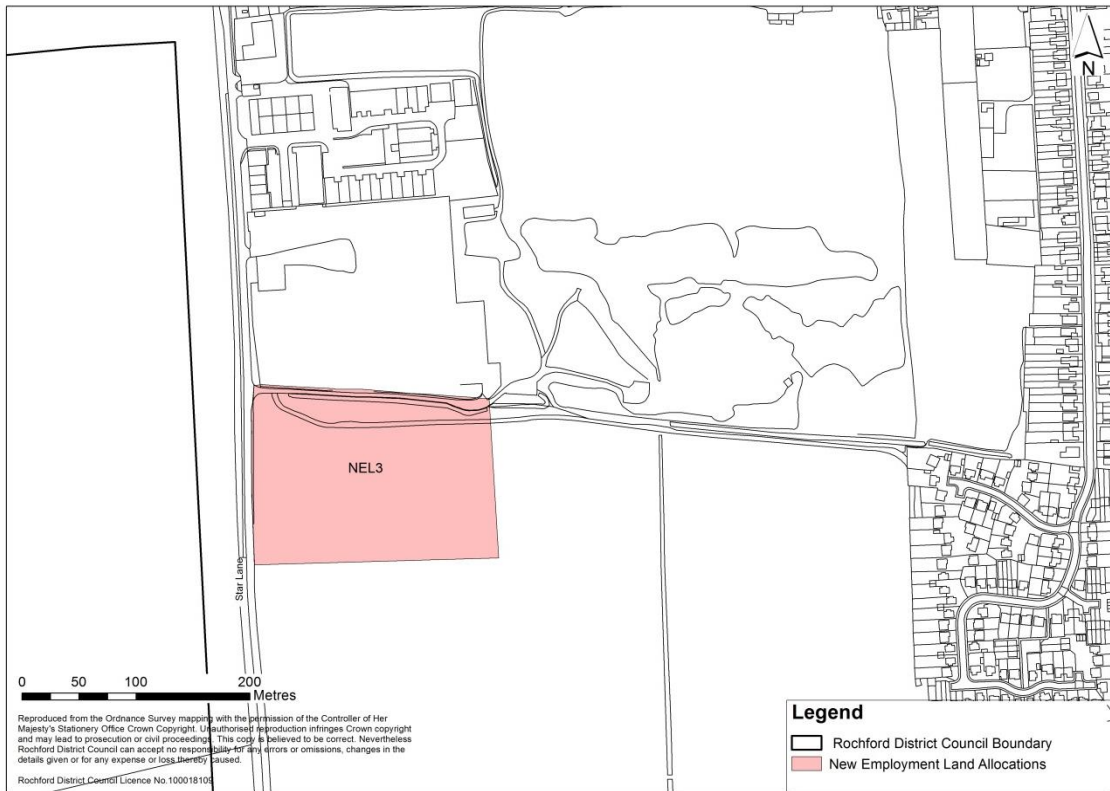
## 2. Revised Site Boundary for SER3



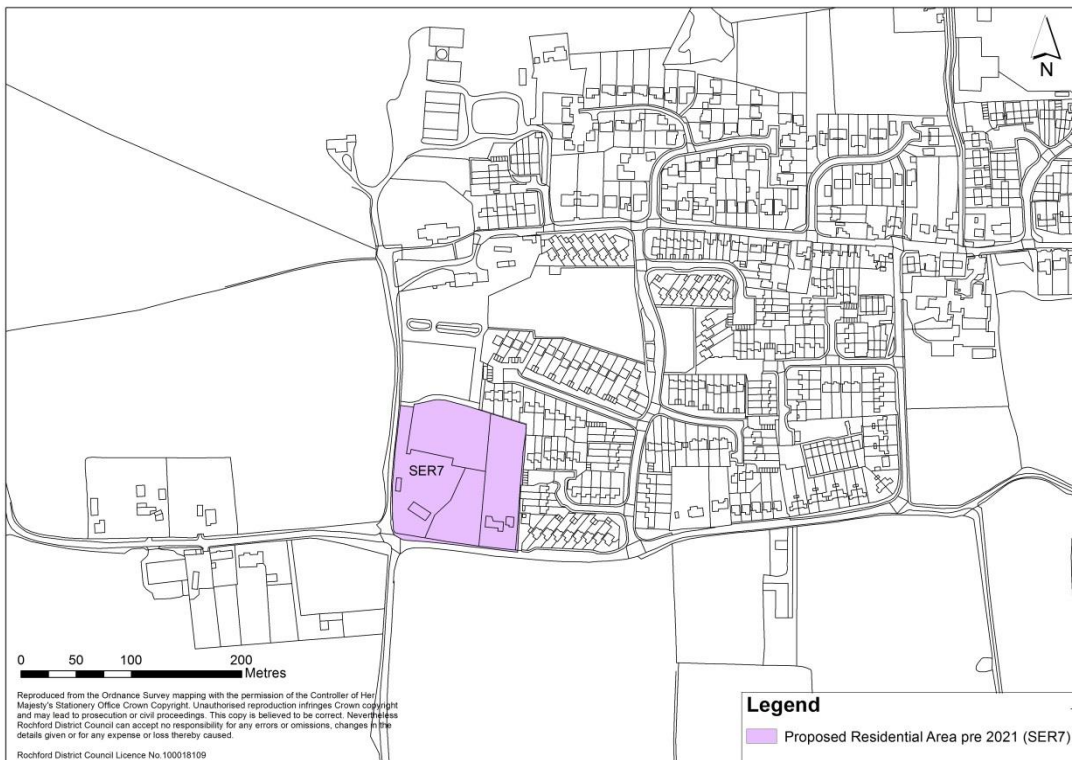
## 3. Revision to map for NEL4



#### 4. Revised Site Boundary for NEL3



#### 5. Revised Site Boundary for SER7





## 6. Revised boundary (Coastal Protection Belt)

