

Consultation Statement

Developing the Allocations Submission Document – the role of Community Involvement and Stakeholder Engagement

This statement satisfies the requirements of Regulation 22 (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012

Rochford District Council – Local Development Framework Allocations Document: Consultation Statement

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1 Introduction

- 1.1 The Allocations Document is a Development Plan Document (DPD) which determines how land uses, such as housing, employment and open space will be allocated across the District. The Allocations Document sits below the Core Strategy in the Local Development Framework and must conform to the overarching approach and policies set out within it. The Core Strategy was adopted by the Council on 13 December 2011.
- 1.2 The development of the Allocations Document has been an iterative process and each stage has been subject to public consultation. This Consultation Statement sets out how local communities and other key partners have been involved in its preparation. It has been prepared in accordance with Regulation 22 (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012, which requires the local planning authority to prepare a statement to accompany the proposed Allocations Submission Document, setting out the following:
- (i). which bodies and persons the local planning authority invited to make representations under regulation 18,
 - (ii). how those bodies and persons were invited to make representations under regulation 18,
 - (iii). a summary of the main issues raised by the representations made pursuant to regulation 18,
 - (iv). how any representations made pursuant to regulation 18 have been taken into account;
 - (v). if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations; and
 - (vi). if no representations were made in regulation 20, that no such representations were made;
- 1.3 As such, for each stage in the production of the Allocations Document, this document sets out: the methods the Council employed to ensure community involvement; groups, organisations and bodies invited to make representation; a summary of the main issues raised; and how representations have influenced the plan-making process. It should be noted that this statement does not contain the detailed content of all the representations, but copies of all the representations are available on request.
- 1.4 There were two key stages of the Allocations Document where representations were invited: Discussion and Consultation (March 2010) and Submission (November 2012).

2 Statement of Community Involvement

- 2.1 Rochford District Council has an adopted Statement of Community Involvement. This sets out how the Council will involve the local community in the preparation of the Local Development Framework. Since the adoption of the Statement of Community

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Involvement in 2007, new regulations came into force which amended the consultation requirements for Local Development Documents, including the stages at which consultation is undertaken.

- 2.2 Although the Statement of Community Involvement was prepared when different regulations were in place, the principles for community involvement and consultation set out in the Statement of Community Involvement are nevertheless still relevant and have been adhered to.
- 2.3 In addition to that undertaken specifically on the Allocations Document, it is important to note that community involvement and consultation on various elements of the evidence base and other strategies which have influenced the Allocations Document has also taken place.

3 Discussion and Consultation Document

- 3.1 The initial stage of the Allocations Document set out a number of site specific options for several land use allocations, including locations for housing and employment development, leisure uses, community uses and open space. This document was published for a formal six-week consultation period between 17 March 2010 and 30 April 2010. The purpose of this document was to provide residents, landowners and other interested parties with the opportunity to consider and comment upon the allocation options that had been suggested for potential development.
- 3.2 The Council engaged the community and other stakeholders through the actions set out in Table 1 below. A wide range of organisations and individuals were consulted on the Discussion and Consultation Document. A list of the specific and general consultation bodies contacted is provided in Appendix 1.

Table 1 – Encouraging Public Participation on the Discussion and Consultation Document

Consultation Method	Details
Public meetings	<p>Public meetings, which were arranged in conjunction with parish/town councils and open to the public, were attended across the District by officers. A presentation on the purpose and content of the document was given by officers and members of the public could ask questions. These meetings sought to maximise public awareness. Leaflets, which summarised the document and explained how to comment, were also available at the meetings.</p> <p>Officers also attended an Information Day in Hullbridge during the consultation in April 2010.</p>
Consultation letters to stakeholders	<p>Letters and emails were sent to key stakeholders, including all relevant bodies listed within Planning Policy Statement 12 (which has since been superseded by the National Planning Policy Framework in March 2012). Key stakeholders are now set out in the Town and Country Planning</p>

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Consultation Method	Details
	<p>(Local Planning) (England) Regulations 2012.</p> <p>Those on the Council's Local Development Framework mailing list – which comprises statutory consultees along with groups and organisations who may have interest in the development of the District, and members of the public who have requested to be kept updated with opportunities to participate – were written to informing them of the consultation period and encouraging them to submit views using the online system. Groups written to inviting comment included those representing sections of the society who have traditionally been underrepresented in the planning process. Mindful that the over-reliance on electronic communication may exclude some sections of society, the opportunity to comment via written correspondence was also made available.</p> <p>A list of the specific and general consultation bodies consulted is provided in Appendix 1.</p>
Rochford District Matters	An article highlighting the consultation was contained within the Council's free newsletter which is distributed to nearly all households in the District.
Press release	Two press releases were issued to local media, and the subject received coverage within local newspaper articles.
Online consultation system	The Council utilised its online consultation system for consultation on the Discussion and Consultation Document. The system allows respondents to submit and view comments online. A link to the system was placed on the Council's website.
Posters	A number of posters were sent to parish/town councils and displayed in various locations throughout the District, promoting the opportunity to participate in the plan-making process.
Information boards	Information outlining the consultation and how the public can be involved was displayed on the electronic information boards in both the Rayleigh and Rochford receptions.

3.3 A total of 8251 representations were made at this stage by 2232 different respondents. Table 2 provides a numerical break down of representations by subject.

Table 2 – Numerical Breakdown of Initial Consultation Responses

Section Name	Respondents	Objectors	Support	Object	Comment	Representations
Allocations	2232	2089	329	5798	2124	8251
Allocations DPD Discussion and Consultation Document	2232	2089	329	5798	2124	8251

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Section Name	Respondents	Objectors	Support	Object	Comment	Representations
Introduction	8	3	0	3	5	8
Core Strategy	7	3	0	3	4	7
Strategic Housing Land Availability Assessment	11	9	1	9	1	11
Allocations and Call for Sites	6	5	1	11	0	12
Residential	1	0	0	0	1	1
Residential Land Allocations	454	439	1	452	16	469
Site identified in the Strategic Housing Land Availability Assessment as being suitable for housing	7	3	2	3	3	8
Residential Allocations – Options	19	15	1	15	3	19
North of London Road, Rayleigh 550 dwellings	199	190	1	195	8	204
Option NLR1	58	48	2	48	9	59
Option NLR2	44	36	2	36	6	44
Option NLR3	55	46	2	47	7	56
Option NLR4	45	37	3	39	5	47
Option NLR5	58	46	6	46	6	58
NLR – Are these the right options?	32	29	0	30	3	33
NLR – Should other sites in this location be considered?	15	3	2	3	10	15
West Rochford 600 dwellings	20	12	1	15	8	24
Option WR1	12	4	2	4	6	12
Option WR2	9	6	1	6	2	9
Option WR3	7	4	0	4	3	7
Option WR4	8	6	0	6	2	8
WR – Are these the right options?	9	8	0	8	1	9
WR – Should other sites in this location be considered?	5	2	2	2	1	5
West Hockley 50 dwellings	480	464	0	482	16	498
Option WH1	36	33	1	34	2	37
Option WH2	26	7	10	7	9	26
Option WH3	27	26	0	27	1	28
Option WH4	38	36	1	38	1	40
Option WH5	14	6	4	6	4	14
WH – Are these the right options?	17	13	2	13	2	17
WH – Should other sites in this location be considered?	9	2	2	2	5	9
WH – Should a mix of these sites be considered?	4	3	0	3	1	4
WH – Would it be better to locate the 50 dwellings on one of these sites or spread the dwellings between a selection of sites?	8	4	1	4	3	8
South Hawkwell 175 dwellings	26	15	0	15	11	26

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Section Name	Respondents	Objectors	Support	Object	Comment	Representations
Option SH1	10	8	0	8	2	10
Option SH2	9	7	0	7	3	10
Option SH3	13	8	0	8	6	14
Option SH4	14	8	2	8	5	15
SH – Are these the options we should be considering for South Hawkwell?	15	13	0	13	3	16
SH – Should other sites be considered?	5	1	1	1	3	5
SH – Should the dwellings be located on one site or a mixture of sites?	7	1	1	1	5	7
East Ashingdon 100 dwellings	82	71	0	72	12	84
Option EA1	12	5	3	5	4	12
Option EA2	13	9	0	10	4	14
Option EA3	12	8	0	8	4	12
EA – Are these sites the most suitable for development in this location?	10	9	1	9	0	10
EA – Should other sites be considered?	5	1	2	1	2	5
EA – Should development be on one site or a selection of sites	4	1	1	1	2	4
South West Hullbridge 500 dwellings (250 between 2015 and 2021, and 250 post 2021)	864	840	4	864	23	891
Option SWH1	55	34	17	35	6	58
Option SWH2	42	34	3	34	6	43
Option SWH3	38	34	1	37	4	42
Option SWH4	59	30	15	32	15	62
SWH – Are these sites the most suitable for development in this location?	35	30	3	32	2	37
SWH – Should other sites be considered?	14	3	6	3	5	14
SWH – Should development be on one site or a selection of sites?	9	3	3	3	3	9
South Canewdon 60 dwellings	20	14	1	14	6	21
Option SC1	21	16	1	16	5	22
Option SC2	20	11	3	11	6	20
Option SC3	27	12	2	13	13	28
Option SC4	15	10	0	10	5	15
SC – Which of these sites is the best location?	7	2	1	2	4	7
SC – Should more sites in the south of Canewdon be considered?	4	2	0	2	2	4

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Section Name	Respondents	Objectors	Support	Object	Comment	Representations
SC – Should development be split between sites or located on one site?	6	2	0	2	4	6
South East Ashingdon 500 dwellings	23	18	2	20	3	25
Option SEA1	3	1	1	1	1	3
Option SEA2	5	4	0	4	1	5
Option SEA3	5	4	0	4	1	5
SEA – Are these the right options for this location?	9	7	0	7	2	9
SEA – Should other sites be considered?	3	0	1	0	2	3
SEA – Should the development be on one site or divided over several sites?	1	1	0	1	0	1
West Great Wakering 250 dwellings	4	1	1	1	2	4
Option WGW1	3	0	2	0	1	3
Option WGW2	5	3	1	3	1	5
Option WGW3	8	4	1	4	4	9
Option WGW4	5	3	0	3	2	5
Option WGW5	5	2	0	2	3	5
WGW – Are these the most suitable sites for development?	8	5	1	5	2	8
WGW – Should development be located on one site or spread over several sites?	3	0	1	0	2	3
WGW – Are there any other sites in this location that should be considered?	4	0	0	0	4	4
Sites recommended in the Strategic Housing Land Availability Assessment	1	0	0	0	1	1
Rawreth Industrial Estate	33	11	9	11	13	33
Stambridge Mills	18	9	4	9	5	18
Star Lane Industrial Estate	12	3	5	3	4	12
Star Lane Brickworks	10	1	5	1	4	10
Housing with the potential to come forward through Areas Action Plans	2	1	0	1	1	2
Eldon Way/Foundry Industrial Estate	17	7	4	7	6	17
Gypsy and Traveller Sites	114	99	1	99	14	114
Option GT1	100	69	14	69	17	100
Option GT2	97	73	17	74	7	98
Option GT3	245	229	2	233	15	250
Option GT4	599	588	0	619	12	631
Option GT5	520	511	0	529	10	539
Option GT6	45	15	14	15	16	45
Option GT7	82	77	1	77	4	82

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Section Name	Respondents	Objectors	Support	Object	Comment	Representations
GT – Are these the best locations to consider?	32	21	0	21	11	32
GT – Should any other locations be considered?	17	7	1	7	9	17
GT – Should the Gypsy and Traveller pitch allocation be located on one site or distributed over several?	38	9	2	9	27	38
Economic Development	2	0	0	0	2	2
Economic Development	1	0	0	0	1	1
Employment Land Study 2008	1	0	1	0	0	1
Option E1 Baltic Wharf	3	1	0	1	2	3
Option E2 Swaines Industrial Estate	1	0	0	0	1	1
Option E3 Purdeys Industrial Estate	3	0	0	0	3	3
Option E4 Riverside Industrial Estate	2	0	0	0	2	2
Option E5 Rochford Business Park	1	0	0	0	1	1
Option E6 Imperial Park Industrial Estate	2	0	1	0	1	2
Option E7 Brook Road Industrial Estate	5	0	0	0	5	5
Option E8 Aviation Way Industrial Estate	2	0	0	0	2	2
Option E9 Star Lane Industrial Estate	2	1	0	1	1	2
Option E10 Eldon Way Industrial Estate. Please also see representations made against Options TC7, TC9 and TC10	448	440	1	452	7	460
Option E11 Stambridge Mills	6	4	1	4	1	6
Option E12 Rawreth Industrial Estate	6	4	1	4	1	6
Additional Employment Land to be Allocated	2	2	0	2	0	2
West of Rayleigh	25	18	0	19	7	26
Option E13	21	17	1	17	3	21
Option E14	22	19	1	19	2	22
Option E15	19	16	1	19	2	22
Option E16	22	19	1	19	2	22
Option E17	23	17	2	17	4	23
Option E18	40	4	18	4	18	40
North of London Southend Airport	7	0	2	0	5	7
South of Great Wakering	4	0	0	0	4	4
Option E19	5	4	0	4	1	5
Option E20	5	4	0	4	1	5
Option E21	4	3	0	3	1	4
Option E22	7	4	0	4	3	7

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Section Name	Respondents	Objectors	Support	Object	Comment	Representations
Option E23	3	1	1	1	1	3
Option E24	3	1	1	1	1	3
Environment	4	1	1	1	2	4
Local Wildlife Sites	1	0	1	0	0	1
Special Protection Areas	2	0	1	0	1	2
Special Areas of Conservation	1	0	0	0	1	1
Flood Zones	3	0	0	0	3	3
Upper Roach Valley	1	0	0	0	1	1
Environmental Allocations	2	0	0	0	2	2
Local Wildlife Sites	1	0	0	0	1	1
Do you agree that the areas shown in Figure 4.3 and listed in Table 4.1 should be allocated as Local Wildlife Sites?	7	0	6	0	1	7
Do you agree that the area shown in Figure 4.4 should be allocated as the Upper Roach Valley?	9	0	8	0	1	9
Do you agree that the Coastal Protection Belt should be as shown in Figure 4.5?	3	0	3	0	0	3
Community Facilities	2	0	0	0	2	2
Education	3	0	0	0	3	3
Site North of London Road Rayleigh	2	1	0	1	1	2
NLR – Do you agree with the approach of allocating land for a new primary school within a future residential allocation in this location?	6	1	3	1	2	6
NLR – Do you agree with the characteristics that such a site would be judged against?	2	0	1	0	1	2
Site to the West of Rochford	3	1	0	1	2	3
WR – Do you agree with the approach of allocating land for a new primary school within a future residential allocation in this location?	3	0	3	0	0	3
WR – Do you agree with the characteristics that such a site would be judged against?	2	0	2	0	0	2
King Edmund School	2	1	0	1	1	2
Option KES1	5	2	1	2	2	5
Option KES2	3	1	1	1	1	3
Option KES3	2	1	1	1	0	2
KES – Do you agree that the allocation of land to enable the expansion of King Edmund School is dependent on the future residential allocation in this general location?	2	0	1	0	1	2

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Section Name	Respondents	Objectors	Support	Object	Comment	Representations
KES – Do you have any views on the three general areas identified as options for school expansion?	2	0	0	0	2	2
Option EDU1 – Great Wakering	1	0	0	0	1	1
Option EDU2 – Barling	1	0	0	0	1	1
Option EDU7 – Greensward Academy, Hockley	3	1	2	1	0	3
Option EDU8 – The Westerings Primary School, Hawkwell	1	0	1	0	0	1
Option EDU9 – Hockley Primary School, Hockley	1	0	1	0	0	1
Option EDU10 – Riverside Junior and Infant School, Hullbridge	2	0	1	0	1	2
Option EDU11 – St Nicholas C of E Primary School, Rayleigh	1	0	0	0	1	1
Option EDU13 – Sweyne Park School, Glebe Junior School (B)	1	0	0	0	1	1
Option EDU16 – FitzWimarc School (B)	1	0	1	0	0	1
Option EDU19 – Stambridge Primary School	1	0	1	0	0	1
Do you agree with the areas identified in EDU1-19?	5	0	2	0	3	5
Open Space	6	0	0	0	6	6
Option OS1	3	0	3	0	0	3
Option OS2	1	1	0	1	0	1
Which approach to the safeguarding of open space do you think would be most effective?	4	1	0	1	3	4
Do you agree with the open spaces proposed to be safeguarded?	3	0	1	0	2	3
Are there other public open spaces that should be protected?	4	0	1	0	3	4
Leisure Facilities	2	0	1	0	1	2
Are there any other spaces within the District that should be allocated for leisure use?	4	0	2	0	2	4
Community Facilities	6	0	0	0	6	6
Option CF1	4	0	1	0	3	4
Option CF2	1	1	0	1	0	1
Which approach to the safeguarding community facilities do you think would be most effective?	2	0	1	0	1	2
Do you agree with the community facilities proposed to be safeguarded?	5	1	1	1	3	5
Town Centres	4	1	0	1	3	4
Rayleigh	1	0	0	0	1	1

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Section Name	Respondents	Objectors	Support	Object	Comment	Representations
Option TC1 – Existing Town Centre Boundary	2	0	0	0	2	2
What are your views on these options for town centre boundaries for Rayleigh?	1	0	0	0	1	1
Rochford	2	0	0	0	2	2
Option TC3 – Existing Town Centre Boundary	2	0	2	0	1	3
Option TC4 – Town Centre Boundary Centred around Market Square	3	0	0	0	3	3
Option TC5 – Town Centre Boundary inclusive of Residential Areas	1	0	0	0	1	1
Option TC6 – Town Centre Boundary Centred on Market Square	2	0	1	0	1	2
What are your views on these options for town centre boundaries for Rochford?	1	0	0	0	1	1
Hockley	5	0	1	0	4	5
Option TC7 – Existing Town Centre Boundary. Please also see representations made against Options TC9, TC10 and E10	446	5	3	5	451	459
Option TC8 – Town Centre Boundary Centred Around Primary Shopping Area	6	1	2	1	3	6
Option TC9 – Town Centre Boundary inclusive of Eldon Way/ Foundary Industrial Estate. Please also see representations made against Options TC7, TC10 and E10	440	438	2	442	0	444
What are your views on these options for town centre boundaries for Hockley?	1	0	0	0	1	1
Option TC10 – Reallocation of Hockley as a District Centre. Please also see representations made against Options TC7, TC9 and E10	452	7	3	7	455	465
Do you think Hockley centre should be reallocated as a District Centre?	6	2	3	2	1	6
Option TC12 – Existing Primary and Secondary Shopping Frontages combined to form Primary Shopping Area	2	0	0	0	2	2
Option TC13 – Existing Primary Shopping Frontage forms Primary Shopping Area	2	0	0	0	2	2
Hockley	1	1	0	2	0	2

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Section Name	Respondents	Objectors	Support	Object	Comment	Representations
Option TC15 – Existing Primary Shopping Frontage forms Primary Shopping Area	6	1	5	1	0	6
Option TC16 – Existing Primary and Secondary Shopping Frontages combined to form Primary Shopping Area	450	1	1	1	460	462
Which option for the Primary Shopping Area of Hockley do you prefer?	4	1	2	1	1	4
Should the Council differentiate between primary and secondary frontage areas within the Primary Shopping Area	1	0	0	0	1	1
Other Issues and Next Steps	4	1	0	1	3	4
Should we allocate any other land uses in the Allocations Development Plan Document not identified in this consultation and discussion document?	5	1	1	1	3	5
Should any of the sites included within Appendix 1 be considered further for allocation?	29	5	5	5	30	40
Moving forward the Allocations Development Plan Document Process	3	2	0	2	1	3

4 Main Issues Raised at the Discussion and Consultation Stage and How They Have Been Addressed

- 4.1 The themes addressed within the Discussion and Consultation Document elicited a significant response from a wide range of stakeholders, including members of the public, developers, landowners and specific consultation bodies.
- 4.2 The most pertinent issues raised during the consultation were in relation to the provision of housing (including the options considered for a Gypsy and Traveller site), the release of Green Belt land, defensibility of Green Belt boundaries and the delivery of appropriate infrastructure (including highway improvements and access to services and facilities). The majority of responses were objections by members of the public to the general locations for Green Belt release and the site-specific options considered for development. Respondents also objected to the options considered for new employment land to the west of Rayleigh. A significant number of responses were also received objecting to the redevelopment of Eldon Way/Foundry Industrial Estate and its inclusion within the town centre boundary.
- 4.3 Several alternative site options for housing and employment land were suggested during the consultation and were appraised within the Discussion and Consultation Document Sustainability Appraisal (July 2012).

- 4.4 The need to allocate a minimum amount of Green Belt land to meet housing need, and the general locations identified, are strategic issues which were addressed during the production of the Core Strategy.
- 4.5 Following the consultation responses received on the initial stage of the document, and concern noted in respect of the options considered, detailed assessments of each of the sites put forward through the 'Call for Sites' and during the consultation within each of the general locations for housing development, as well as options within the Discussion and Consultation Document, were undertaken. Detailed assessments for employment land were also undertaken. These detailed assessments considered the constraints on-site, the potential impact of allocating each site on Green Belt objectives, identification of any site sustainability issues (including proximity to services and facilities, and nature conservation designations, and potential impact on the historic environment) and potential visual impact.
- 4.6 In relation to the responses received objecting to the identification of Eldon Way/Foundry Industrial Estate, the principles of redeveloping the site are set out in the adopted Core Strategy. The precise detail for the centre of Hockley is contained in the emerging Hockley Area Action Plan (and thus has been subject to separate consultation and appraisal).
- 4.7 The Concept Statements prepared for each of the sites identified in the Allocations Submission Document have been prepared in response to issues raised at the initial stage. The proposed sites identified for residential and employment development have been selected taking into account the consultation responses, Sustainability Appraisal and detailed assessment of all the potential options with each general location. The sites identified are considered to be the minimum size necessary to meet the dwelling and infrastructure requirements for each location. The employment sites have also been determined based on the compensatory and new employment land requirements.
- 4.8 Each Concept Statement set out site-specific requirements for the delivery of infrastructure. The Council consulted the local highway authority (Essex County Council) in particular on the potential options for residential and employment development, which informed the more detailed highway and access/egress requirements for the sites proposed in the Submission Document.
- 4.9 Other infrastructure requirements, including open space and education provision, have also been included within the Plan.
- 4.10 The Concept Statements also ensure that the proposed sites would enable the creation of defensible Green Belt boundaries, for example through the arrangement of the site, or the requirement to provide green buffers outside the site, and other mitigation measures such as design.
- 4.11 A summary of the issues raised at the Discussion and Consultation stage, together with initial officer comments on these, is detailed in Appendix 2.

5 Pre-Submission Document

- 5.1 The Allocations Submission Document was published in November 2012, and it was subject to an eight-week pre-submission consultation period from 29 November 2012 to 25 January 2013.
- 5.2 The Council consulted the community and other stakeholders through the actions set out in Table 3 below.

Table 3 – Consultation Methods at the Pre-Submission Stage

Consultation Method	Details
Consultation letters to stakeholders	<p>Postcards / emails were sent to key stakeholders, including all relevant bodies listed within the Town and Country Planning (Local Planning) (England) Regulations 2012.</p> <p>Those on the Council's Local Development Framework mailing list – which comprises statutory consultees along with groups and organisations who may have interest in the development of the District, and members of the public who have requested to be kept updated with opportunities to participate – were written to informing them of the consultation period and encouraging them to submit views using the online system. Groups written to inviting comment included those representing sections of the society who have traditionally been underrepresented in the planning process. Mindful that the over-reliance on electronic communication may exclude some sections of society, the opportunity to comment via written correspondence was also made available.</p> <p>In total over 5000 letters and emails were sent to individuals and organisations informing them of the pre-submission consultation and their opportunity to comment at this stage.</p> <p>A follow-up mailshot was also sent to those with email address (over 2700 individuals and organisations) to remind them of the opportunity to participate in the consultation.</p>
Rochford District Matters	An article highlighting the consultation was contained within the Council's free newsletter which is distributed to nearly all households in the District.
Press release	Press releases were issued to local media, and the subject received coverage within local newspaper articles.
Online consultation system	The Council utilised its online consultation system for consultation on the Submission Document. The system allows respondents to submit and view comments online. A link to the system was placed on the Council's website.

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Consultation Method	Details
Posters	A number of posters were sent to parish councils and exhibited in various locations throughout the District, promoting the opportunity to participate in the plan-making process.

- 5.3 A total of 459 representations were made at this stage by 293 different respondents. Of the 459 representations made, 386 objected to the Allocations Submission Document on the grounds of soundness / legal compliance. Table 4 provides a numerical break down of representations by subject.

Table 4 – Numerical Breakdown of Pre-Submission Consultation Responses

Section Name	Respondents	Objectors	Support	Object	Comment	Representations
Allocations Submission Document	293	278	73	386	0	459
Allocations Submission Document	293	278	73	386	0	459
Introduction	9	7	3	8	0	11
Brownfield Residential Land Allocations	3	3	0	3	0	3
Policy BFR1 – Star Lane Industrial Estate, Great Wakering	14	12	2	13	0	15
Policy BFR2 – Eldon Way/Foundry Industrial Estate, Hockley	6	5	1	5	0	6
Policy BFR3 – Stambridge Mills, Rochford	6	4	2	4	0	6
Policy BFR4 – Rawreth Industrial Estate, Rayleigh	6	4	2	6	0	8
Settlement Extension Residential Land Allocations	9	8	1	9	0	10
Policy SER1 – North of London Road, Rayleigh	12	6	6	12	0	18
Policy SER2 – West Rochford	6	2	4	3	0	7
Policy SER3 – West Hockley	7	2	5	2	0	7
Policy SER4 – South Hawkwell	6	3	3	4	0	7
Policy SER5 – East Ashingdon	4	1	3	2	0	5
Policy SER6 – South West Hullbridge	175	172	4	187	0	191
Policy SER7 – South Canewdon	72	65	7	66	0	73
Policy SER8 – South East Ashingdon	6	3	3	5	0	8
Policy SER9 – West Great Wakering	20	17	4	20	0	24
Policy GT1 – Gypsy and Traveller Accommodation	7	4	3	5	0	8
New Employment Land Allocations	1	1	0	1	0	1

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Section Name	Respondents	Objectors	Support	Object	Comment	Representations
Policy NEL1 – South of London Road, Rayleigh	5	3	2	4	0	6
Policy NEL2 – West of the A1245, Rayleigh	6	5	2	7	0	9
Policy NEL3 – South of Great Wakering	7	5	2	6	0	8
Policy NEL4 – North of London Southend Airport	2	2	0	3	0	3
Policy ELA1 – Local Wildlife Sites	3	1	2	1	0	3
Policy ELA2 – Coastal Protection Belt	1	0	1	0	0	1
Policy ELA3 – Upper Roach Valley	1	0	1	0	0	1
Policy EDU1 – North of London Road, Rayleigh	2	1	1	1	0	2
Policy EDU2 – West Rochford	2	1	1	1	0	2
Policy EDU3 – King Edmund School	2	1	1	2	0	3
Policy EDU4 – Existing Primary and Secondary Schools	1	1	0	1	0	1
Policy OSL1 – Existing Open Space	2	0	2	0	0	2
Policy OSL2 – New Open Space	2	0	2	0	0	2
Policy OSL3 – Existing Leisure Facilities	1	0	1	0	0	1
Town Centre and Primary Shopping Area Boundary Allocations	1	1	0	1	0	1
Implementation, Delivery and Monitoring	1	1	0	1	0	1
IDM – Brownfield Residential Land Allocations	1	1	0	1	0	1
IDM – Settlement Extension Residential Land Allocations	1	1	0	1	0	1
IDM – Ecological and Landscape Allocations	1	0	1	0	0	1
Proposals Map	1	1	0	1	0	1
Characteristics Map	1	0	1	0	0	1

- 5.4 In addition to such representations, a number of comments were also submitted which did not refer to either soundness or legal compliance. These are available to view separately. Similarly, additional evidence submitted by respondents during the pre-submission consultation is available to view separately.
- 5.5 A summary of the issues raised by specific and general consultation bodies at the pre-submission stage, together with initial officer comments on these, is detailed in Appendix 3. Issues raised by other respondents during the consultation are set out in Appendix 4.

- 5.6 Some representations were submitted after the close of the consultation on 25 January 2013. Copies of these representations are provided in Appendix 5.
- 5.7 Original copies of additional supporting evidence submitted during the consultation are available to view separately.
- 5.8 A proposed schedule of changes was subsequently drawn up taking into account these representations (Appendix 8 – discussed further later). The Environment Agency submitted objections; but these were subsequently withdrawn following additional information becoming available (see Appendix 3 for further details).

6 Duty to Co-operate

- 6.1 The Localism Bill received Royal Assent on 15 November 2011. Section 110 of the Localism Act sets out the duty to co-operate, which relates to sustainable development or use of land that would have a significant impact on at least two local planning areas or on a planning matter that falls within the remit of a county council. It requires councils to set out planning policies to address such issues, and consider joint approaches to plan making. It also requires councils to engage constructively, actively and on an on-going basis with other councils and public bodies in plan preparation.
- 6.2 The Core Strategy was produced in compliance with the now defunct Regional Spatial Strategy – the East of England Plan – which was approved by local authorities in the region. As such, the key strategic elements of the Council's Local Development Plan have already been determined in cooperation with neighbouring local authorities.
- 6.3 A key issue in respect of the duty to cooperate for the Allocations Document is highways, as highways fall within the remit of Essex County Council; and in addition the impact of the allocation of land on highways has the potential to impact on other authorities outside of Rochford District. As such, engagement with Essex County Council – as the Highway Authority – has been an important element in the production of the Plan.
- 6.4 Following the adoption of the Core Strategy on 13 December 2011, officers met with Essex County Council highways and public transport representatives 22 February 2012 to discuss the potential options for the allocation of land for residential (including Gypsy and Traveller site options) and employment uses. This meeting was used to inform the identification of proposed sites for allocation and specific requirements within Concept Statements.
- 6.5 The potential site options for allocation within the Core Strategy general locations were assessed in further detail to aid the preparation of the Allocations Document. These documents form part of the evidence base. Officers arranged another meeting with Essex County Council on 30 August 2012 to discuss specific issues relating to proposed site allocations for residential (including Gypsy and Traveller site options) and employment uses.
- 6.6 Discussions with the highways authority both during the preparation of the Core Strategy and the Allocations Document have considered the cumulative, and

individual, impact of the developments across the District on the highway network. This was done on an individual location basis and on a cumulative basis which assessed the impact of the cumulative development.

- 6.7 A copy of the notes from both these meetings between the Council and Essex County Council is provided within Appendix 7 (A).
- 6.8 The A130 forms part of the strategic highway network for south Essex, passing through the administrative areas of Castle Point Borough, Basildon Borough, Chelmsford City and Rochford District in a broadly north-south direction. Officers from these local authorities and Essex County Council agreed to meet to discuss the potential for developing a landscape strategy for the A130 corridor, to set out the type of development that may be appropriate in this location. Officers initially met to discuss this project on 10 August 2012. At this meeting, it was highlighted that Michelin's Farm in Rayleigh (located at the junction of the A130/A127 and A1245) was being considered for new employment land. This site was included in the Discussion and Consultation Document published in 2010. From this meeting, a project brief was prepared. Unfortunately officers were unable to attend the next meeting which took place on 23 November 2012.
- 6.9 The local planning authority contacted neighbouring authorities (Basildon Borough, Castle Point Borough, Chelmsford City, Maldon District and Southend Borough Councils) and Essex County Council on 5 November 2012 informing them that the draft Allocations Pre-Submission Document was approved by the Local Development Framework Sub-Committee on 27 October 2012, and would be taken to Full Council on 27 November 2012. Officers and members were provided with an opportunity, prior to the document being taken to Full Council and pre-submission consultation, to raise any concerns in relation to the draft allocations.
- 6.10 Castle Point Borough Council responded on 19 November 2012 setting out two key concerns in relation to two proposed allocations; GT1 and NEL2. These proposed allocations encompass Michelin's Farm in Rayleigh. The two key concerns were the impact on the strategic highways network and the impact on the strategic purpose of the Green Belt.
- 6.11 The Council replied on 4 December 2012 explaining the Council's approach to the proposed allocation of the site in relation to the two key concerns raised by Castle Point Borough Council. Correspondence in relation to consultation with neighbouring authorities prior to formal pre-submission consultation is provided in Appendix 7 (B).
- 6.12 Three of the Councils neighbouring authorities responded formally during the pre-submission consultation on the Allocations Document (Basildon Borough, Castle Point Borough and Chelmsford City). Essex County Council also submitted representations. The Council provided these authorities with a summary of the consultation responses received from specific and general consultation bodies, together with RDC Officers' initial response to issues raised, and these fed into the production of a proposed schedule of changes to the Allocations Submission Document. Officers were invited on 14 March 2013 to submit any comments on the proposed schedule of changes or to meet with the Council to discuss this further. Correspondence is provided in Appendix 7 (B).

- 6.13 Officers from Basildon Borough Council requested to meet with officers to discuss their representations in further detail. Officers met on 4 April 2013 and a note of the meeting is provided within Appendix 7 (C).
- 6.14 A summary of the consultation responses received from specific and general consultation bodies, together with officers' initial response to issues raised is provided in Appendix 3. The proposed schedule of changes to the Allocations Submission Document, which has been prepared in response to these comments, are provided in Appendix 8.

7 Summary and Overview

- 7.1 The Council has consulted throughout the preparation of the Allocations Document in accordance with the Statement of Community Involvement. Respondents to the consultations were predominantly against any additional development in the District, particularly on Green Belt land, which is reflected in the consultation summaries. Whilst there are objections from neighbouring authorities to the Plan, the issues raised are not considered to be strategic, cross-boundary issues per se.

Appendix 1 – Specific and General Consultation Bodies

The following organisations were consulted on the Allocations Submission Document.

Althorne Parish Council

Anglian Water Services Ltd

Arriva Southern Counties

Ashingdon Parish Council

Barling Magna Parish Council

Basildon Borough Council

Burnham on Crouch Town Council

c2c Rail & National Express East Anglia

Campaign to Protect Rural Essex

Canewdon Parish Council

Castle Point Borough Council

Chelmsford Borough Council

CPREssex

Crouch Harbour Authority

Croud Ace

Defence Estates

Department for Communities and Local Government

Disability Essex

DTZ Piedad Consulting

East of England Local Government Association

East of England Regional Animal Health Office

English Heritage

Environment Agency

Essex & Suffolk Water

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Essex Autistic Society

Essex Bridleways Association

Essex Chambers of Commerce

Essex County Council

Essex County Council (Highways)

Essex County Council (Schools Service)

Essex County Council Public Rights of Way

Essex Libraries

Essex no 1 Circuit of Jehovah's Witnesses

Essex Police

Essex Police Headquarters

Essex Wildlife Trust

Essex Wildlife Trust Rochford & Southend Area

Essex Youth Service

Estuary Housing Association

Federation of Small Businesses

First Essex Buses

Foulness Parish Council

Great Wakering Parish Council

Grove Park Residents Association

Hawkeell Parish Council

Hawkeell Residents Association

Health & Safety Executive

Highways Agency

Hockley Chamber of Trade

Hockley Parish Council

Hockley Residents Association

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Home Builders Federation
Homes & Communities Agency
Hullbridge Parish Council
Leigh Town Council
Little Burstead Parish Council
London Gypsy and Traveller Unit
London Southend Airport
Marine Management Organisation
Mobile Operators Association
National Federation of Gypsy Liaison Groups
National Grid Gas
National Wind Power
Natural England
Network Rail
NHS South East Essex
NHS South Essex
Noak Bridge Parish Council
North Fambridge Parish Council
Paglesham Parish Council
Purleigh Parish Council
Ramsden Bellhouse Parish Council
Ramsden Crays Parish Council
Rawreth Parish Council
Rayleigh Chamber of Trade
Rayleigh Mount Local Committee
Rayleigh Town Council
Renewable UK

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Roch Fairways and Conservation Committee

Rochford & District Chamber of Trade & Commerce

Rochford & Rayleigh CAB

Rochford Chamber of Trade

Rochford District Access Committee

Rochford District Council

Rochford District Residents

Rochford Hundred Amenity Society

Rochford Hundred Golf Club

Rochford Parish Council

Rochford Police Station

Runwell Parish Council

Sanctuary housing association

SE Essex Organic Gardeners

SEETEC

South East Essex Friends of the Earth

South East Essex Green Party

South East Local Enterprise Partnership

South Essex Natural History Society

South Essex NHS Trust

South Woodham Ferrers Town Council

Southend & Rochford Community Command

Southend-on-Sea Borough Council

Southminster Parish Council

Sport England (East Region)

St Peter & Paul Parish Church

Stambridge Parish Council

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Stow Maries Parish Council

Sustrans

Sutton Parish Council

Swan Housing Association

The National Federation of Gypsy Liaison Groups

The National Trust

The National Trust Rayleigh Mount Local Committee

The Planning Inspectorate

The Society for the Protection of Ancient Buildings

The Theatres Trust

The Woodland Trust

Traveller Law Reform Project

Treasurer Crouch Harbour Authority

West Rochford Action Group

Woodham Ferrers & Bicknacre Parish Council

Woodland Trust

Appendix 2 – Issues Raised during Consultation on the Discussion and Consultation Document

Issue Raised	Initial Officer Comments
Introduction	
It was stated that the data contained for the sites in Appendix 1 is incorrect and biased. A respondent commented that the assessment of sites has not been consistent.	The assessment within Appendix 1 utilises a proforma to ensure it is consistent and objective. A small number of changes were made to Appendix 1 following consultation, and the amended Appendix 1 assessment has been published and will be fed into the decision-making process for the next stage of the Development Plan Document.
There is no evidence as to why the sites in the document have been chosen and why those in Appendix 1 have not. There is no reason given and there is a bias towards large sites.	Sites have been selected according to how well they relate to the aims and locations of the Core Strategy Submission Document. The Allocations DPD must conform to the Core Strategy DPD and so any sites not within locations shown in the Core Strategy have not been taken forward, as explained the Appendix 1 assessment of sites. The Core Strategy considered small sites spread across the District at the Issues and Options stage and the Sustainability Appraisal of this document found that the most sustainable option was several larger sites.
PPG2 has not been considered in terms of proposals for Green Belt release.	This is not the case - the documents produced by the Council do have regard to national planning guidance. PPG2 recognises that if there are exception circumstances then the release of land from the Green Belt may be acceptable. Furthermore in the development of planning policy, the issue of meeting housing needs (PPS3) must be balanced against other considerations such as PPG2.

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Issue Raised	Initial Officer Comments
<p>The sites chosen are unsustainable and Brownfield sites should be used instead. Transport access to the sites is poor and this should be a major consideration. The impact of additional housing on the local areas should be considered.</p>	<p>Brownfield sites have been assessed and considered within the Strategic Housing Land Availability Assessment (SHLAA), and the Council's approach to housing (as set out in the Core Strategy which sets the overarching policies for the development of the District) is that brownfield sites be favoured ahead of greenfield wherever possible.</p> <p>Transport is a significant consideration for any of the sites that have been taken forward within the Allocations DPD. The impact of additional development on the area has been considered on a site by site basis, and on a cumulative basis, and Appendix H2 of the Core Strategy outlines the infrastructure requirements that are necessary before development takes place.</p>
<p>Smaller developments should be considered first over larger developments.</p>	<p>The Core Strategy considered small sites spread across the District at the Issues and Options stage and the Sustainability Appraisal of this document found that the most sustainable option a number of larger sites in the general locations set out in the Core Strategy.</p>
<p>Serious concerns over the deliverability of the sites outlined in the SHLAA. The Council is over reliant on the delivery of existing employment sites. Alternative sites are more suitable.</p>	<p>The SHLAA is a living document and will be updated regularly. The Council consider that all of the sites within the SHLAA are deliverable. The Council will manage the delivery of the sites that come forward through the SHLAA.</p>
<p>Infrastructure improvements need to be implemented prior to any development taking place.</p>	<p>Appendix H2 of the Core Strategy outlines the infrastructure requirements that will be required prior to the occupation of development coming forward.</p>
<p>Concern that the housing requirement will not be met through the current document, and the assessment of sites in the Allocations DPD and in the SHLAA is not consistent.</p>	<p>The Council will adopt the 'Plan Monitor Manage' approach which will ensure that a constant five year supply of housing land can be provided in accordance with PPS3.</p>
<p>The location and accessibility of the sites to public transport facilities should be a priority when deciding on the best locations for development.</p>	<p>Comment noted. Accessibility of sites to public transport has been considered as part of the decision-making process.</p>

Issue Raised	Initial Officer Comments
How can the term “creating a robust and defensible Green Belt boundary” be used, when there is already a robust and defensible Green Belt boundary in existence that is being altered to allow for new development?	The Council has assessed the housing need within the District, and assessed the Brownfield sites that can be used for housing. However, more housing is required than can be accommodated on brownfield sites and as identified within the Core Strategy (the document which sets the overarching approach to development in the District and to which the Allocations Development Plan Document must conform) a small area of Green Belt land is required for residential development. It is important that any changes to the Green Belt boundary result in a new boundary which is defensible.
School places should be considered for all locations, not just East Ashingdon and South East Ashingdon.	Working with Essex County Council, the requirement for school places has been considered for all locations in the district. The analysis shows that in some parts of the district, additional school places will not be required as a result of the proposed housing development. Where additional school places are required, these will be provided (as set out in the Core Strategy)
Green Belt land should only be allocated when the supply of Brownfield land has been exhausted.	The Core Strategy prioritises the re-use of brownfield land ahead of Green Belt release wherever this is practicable. However, there is a limited supply of appropriate brownfield land outside of the Green Belt, and some Green Belt reallocation is required.
The sites included within the Allocations DPD are ‘options’ and this approach is supported.	Comment noted.
Industrial sites must be placed away from residential dwellings.	Comments noted. This is generally what the Council seek to achieve in reallocating current ‘bad neighbour’ industrial estates identified in the Employment Land Study and the SHLAA to be suitable for residential development.

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Issue Raised	Initial Officer Comments
<p>The consultation document could have been clearer on the current status of the Core Strategy and the potential for changes to the document through the examination process which will affect site options in the Allocations DPD. Representations have been made on the soundness of the Core Strategy which may lead an independent Government Inspector to conclude an alternative hierarchy and distribution of development.</p>	<p>The Core Strategy was at an advanced stage at the time the Allocations Discussion and Consultation Document was published. The Council have now received a report on the soundness of the document from the Planning Inspectorate, and this has confirmed that the Core Strategy is sound and that no changes in respect of the distribution of development are required.</p>
<p>Existing infrastructure will not be able to cope with additional development.</p>	<p>Infrastructure providers have been consulted throughout the preparation of the Core Strategy and on this document. The District Council is working closely with them to ensure that the options taken forward are viable, deliverable, and that any negative impacts are mitigated. Appendix H2 of the Core Strategy outlines the infrastructure requirements that are necessary before development takes place.</p>
<p>Comprehensive consultation has not taken place with Essex County Council, other district councils, local parish/town councils, residents associations and other interested parties in and around our District. The additional homes will put an enormous strain on the infrastructure of the area, particularly the road system, which has not been addressed in the document.</p> <p>Loss of Green Belt in the area, which would change villages into towns.</p> <p>Additional vehicles on the roads from the building of the new homes, the additional residents, their delivery services and visitors and the proposed airport expansion traffic.</p> <p>Additional demand on our doctors and dentists. Additional demand on schools and social services.</p> <p>The number 7 and 8 bus has now been reduced to mainly one bus an hour and there is now no evening number 8 service.</p>	<p>This is not the case. Consultation has taken place with service providers, including Essex County Council, Parish Councils, Residents Associations and residents throughout the development of the Core Strategy and through this document. The purpose of the consultation is to give people an opportunity to share their views and for service providers, with whom we are working closely, to flag up any issues with proposed development sites. Feedback from consultation has played a significant role in producing the Core Strategy (including determining the general locations for new residential development) and will play an important role in the Allocations Development Plan Document. New infrastructure will be required to be implemented alongside new development, as identified in the Core Strategy.</p>

Issue Raised	Initial Officer Comments
<p>Additional demand on gas, electric, telephone, water, sewers and surface/storm water drainage.</p> <p>Moving Eldon Way and the Foundry Estate to a Green Belt site at the airport area will increase mileage for employees and the lack of public transport will limit employment to car users. Cycling would be a poor and unrealistic substitute.</p> <p>ECC has stated that the B1013 is now running at 72% capacity. The Core Strategy proposal would bring the traffic to an unbearable level. No details and estimated costs are given of the many road improvements necessary.</p>	
<p>The District is enclosed by the River Crouch, the sea and the Thames and is only properly accessed from the west. For this reason, additional homes should be located in the western part of Rochford District.</p>	<p>The general locations for new development are set out in the Core Strategy, including proposals for a proportion of new development to be directed to the western part of the District, but the Council has adopted a balanced strategy for the distribution of new housing across the district.</p>
<p>General abbreviations were used with no definition of their meaning, and clarification was needed as to what was actually being planned as this was not made clear.</p>	<p>It should be noted that meanings of abbreviations were given for the first time of use, but the comment is noted. The Council also produces a universal glossary of planning terms and abbreviations.</p>
<p>It is not clear how housing figures have been arrived at, and that previous housing completions have not been taken into account.</p>	<p>This is not the case. Housing figures are determined through the Regional Spatial Strategy (the East of England Plan). The Core Strategy DPD explains the overall housing figures and overarching policies (such as general locations for development). The Allocations DPD looks at specific sites for development.</p>
<p>It is not clear as to the stages of the document and what will happen next and when.</p>	<p>Other Issues and Next Steps on Page 155 outlines the various stages of the document, and the timetable for each one.</p>

Issue Raised	Initial Officer Comments
There is no available cost benefit analysis, therefore making it more difficult for respondents to assess the true impact of proposals.	At this stage of the document the options are at the initial stage, and were presented for discussion. A sustainability appraisal, which provides an analysis of the economic, social and environmental impacts of proposals, will be produced and published prior to the next round of consultation.
Comments were made about the nature of the consultation itself, and suggestions made as to how this could be improved to reach more residents.	Comments noted. The Council has an adopted Statement of Community Involvement that sets out how we will engage with the community and other stakeholders in the plan-making process. However, the Council is always open to suggestions on how better to engage with the community.
Why are sites within the Strategic Housing Land Availability Assessment and the Urban Capacity Study not assessed or shown within the Allocations DPD.	The purpose of the Strategic Housing Land Availability Assessment is to assess land in the District that may be suitable for housing. This document is an update of the Urban Capacity Study. These documents are evidence base documents which were used when producing the Allocations DPD. The sites within them have already been assessed and thus are not assessed within the Allocations DPD.
The Call for Sites exercise was questioned and it was commented that the responses to this are not available, although they should be included within the document.	The responses to the Call for Sites exercise are assessed within Appendix 1 of the Allocations DPD and are also available on the Rochford District Council's website.
The cumulative impact of all developments within the District and the developments outside the District will have an impact on the movements of residents and employees within the District, and it was questioned why this was not assessed as part of the Allocations DPD.	This is not a matter for the Allocations DPD. The cumulative impact of developments has been considered as part of the Core Strategy, which sets out the general locations for development.
It would have been useful to have links or references to the other planning documents mentioned within the Allocations DPD and that additional cross referencing was required.	Comment noted. The document sought to provide the necessary information without being overly complex and confusing.

Issue Raised	Initial Officer Comments
<p>There is no justification as to why Green Belt release is required, or how previously developed land has been assessed to determine its suitability for residential development.</p>	<p>This is not the case; Justification is provided on Page 4 of the Allocations DPD. In any event, it is for the Core Strategy to set out the planning framework for the district and not the Allocations DPD. The District's housing supply includes extant permissions and sites already allocated for housing, but additional land needs to be allocated in order to meet the housing need of the District as identified in the Thames Gateway Strategic Housing Market Assessment. This will be allocated through the Strategic Housing Land Availability Assessment (SHLAA) and release of Green Belt sites. The Council have fully assessed the brownfield sites in the District (through the SHLAA) and the release of this land for housing will not meet the housing need, hence the requirement to allocate some Green Belt.</p>
<p>Empty homes within the District do not appear to have been accounted for.</p>	<p>The requirements of the East of England Plan are expressed in net additional dwellings, and do not include empty homes. Strategic Housing Market Assessments (which evidence the need for additional homes) consider the number of vacant dwellings in their calculations. The 2010 Thames Gateway South Essex Strategic Housing Market Assessment noted there were 957 vacant dwellings in Rochford District in 2009, and accounted for these in its calculations.</p>
<p>Lack of clarity regarding the Council's position in the situation that housing need is such in the future that no additional dwellings are needed. It was raised that this needs to be stated within the document.</p>	<p>The housing need and delivery will be monitored on a regular basis, through documents such as the SHLAA and the Annual Monitoring Report. The LDF documents are known as "living documents" and therefore can be amended (which would be subject to public consultation) and updated as required. The Strategic Housing Market Assessment demonstrates that housing is required, and is projected to continue to be required in the future. The Strategic Housing Land Availability Assessment shows that additional land is required for housing.</p>

Issue Raised	Initial Officer Comments
<p>How is the allocation of dwellings determined in terms of location - the allocation did not seem to reflect the infrastructure and services available in each of the locations specified.</p>	<p>The locations of the land to be reallocated for residential and employment development were decided through the preparation of the Core Strategy DPD. This document has been subject to several rounds of consultation, and through the Sustainability Appraisal (an assessment of economic, social and environmental impacts) of each of the stages of the Core Strategy, locations that the Council considered to be most sustainable were selected. The Allocations DPD must conform to the Core Strategy and as such the site options within it reflect the general locations determined to be the most sustainable within the Core Strategy.</p>
<p>With regard to industrial locations that have been identified as having the potential to be used for alternative uses within the Strategic Housing Land Availability Assessment, what types of alternative use have been identified and what is the justification.</p>	<p>The Employment Land Study and the SHLAA assessed existing employment sites for their current use and whether they were 'fit for purpose'. The Employment Land Study stated that several sites were not appropriate for industrial purposes due to their location, accessibility, proximity to residential areas, and building quality on the site and consequently the site would be more suited for alternative purposes. Justification for this can be found within the Employment Land Study and the Strategic Housing Land Availability Assessment.</p>
<p>What improvements to the highways network will be required at each of the locations specified within the document? The impact on the A127 from the development proposed was also questioned, and the contingency plan for the A127 was requested.</p>	<p>The exact highway improvements will be determined at a later stage of document production process, when the exact sites have been assessed and selected. The consideration of potential sites will include views from the Highways Authority. Once the sites have been selected, the highways authority will be consulted to ascertain the exact highways requirements. This will be done on an individual location basis and on a cumulative basis which will assess the impact of the cumulative development on major routes such as the A127.</p>
<p>Are the Flood Zone designations within the document current and accurate as the Environment Agency update these every quarter?</p>	<p>The Flood Zone designations were correct at the time of publication. They will be updated for future iterations of the document if required.</p>

Issue Raised	Initial Officer Comments
<p>Rochford District has an ageing population - this will result in additional homes becoming available through movement into sheltered housing and care homes, and death. Are these changes accounted for within the document?</p>	<p>This is accounted for within the Core Strategy DPD which states that new development should contain a mix of dwelling types to ensure they cater for all people within the community whatever their housing needs. The requirements for different house tenures is informed by the Thames Gateway South Essex Strategic Housing Market Assessment.</p>
<p>Elderly residents of the District perceive additional development to result in increased crime levels, increased noise, an increase in cold calling, worsening pavement conditions and an increase in children playing around the village centre, increasing noise levels further. How does the Council intend to help the older population come to terms with the proposed changes?</p>	<p>The Sustainable Community Strategy for Rochford District was produced by the Local Strategic Partnership (a partnership of key public, private and voluntary sector organisations) and gives all organisations a clear focus on what the priorities are in the District. These priorities include supporting the District's ageing population and fostering greater community cohesion. In respect of the latter, the Sustainable Community Strategy notes there are currently 'sticking points' between the differing generations within our communities. There is a perception of anti-social behaviour and a fear of crime and disorder, a perception that the Local Strategic Partnership will help to address through greater community engagement and supporting community projects.</p>
<p>The level of funding being received currently by Parish Councils from Rochford District Council is insufficient for youth facilities, pensioners' facilities, maintenance of public areas and toilets, footpaths, street lighting, bridle and cycle path maintenance, recycling rubbish and dog waste bins. How the District Council intend to increase funding to Parish Councils in order to accommodate the additional residents and associated new facilities?</p>	<p>This is not a question for the Allocations DPD. In any event, Parish Councils make their own decisions about funding requirements through their annual precept, which is an addition to the standard council tax bill. There is also some misunderstanding in the items listed of the responsibilities of the district council versus those of parish councils.</p> <p>It is also relevant to note that developers will be required to make payments that contribute towards the infrastructure for which their developments engender a need.</p>

Issue Raised	Initial Officer Comments
<p>There are a large number of mobile homes within Hullbridge and these are an important feature of the area. Why are Gypsy and Travellers needs given attention within the document and not the needs of mobile home residents?</p>	<p>The needs of all the district's residents are considered through the preparation of planning policy documents. There is no evidence to suggest that additional land is required to be allocated to meet the needs of mobile home residents.</p> <p>Gypsies and Travellers are recognised ethnic groups under the Race Relations Act (1976 and 2000), and there is an identified need for a small number of additional pitches to be allocated, as evidenced by the 2009 Essex Gypsy and Traveller Accommodation Assessment (GTAA).</p>
Residential Land Allocations	
<p>Who are the additional dwellings aimed at in terms of age groups and religious groups, what kind of dwellings will be delivered, and which development guidelines will have to be adhered to?</p>	<p>The dwellings are aimed at those in need of housing which can apply to persons of any age group, religious group etc. The types of dwellings that will be delivered will have to comply to policies set out within the Core Strategy and the Development Management DPD which state that new developments must be a mix of dwelling types, and that developers should consult with the Council's Housing Strategy team to determine the required mix of dwellings types in order to ensure the housing need is being met.</p>
<p>How can the Council know that the required number of homes can be delivered in each site specified within the document, and how can additional homes be prevented?</p>	<p>The Allocations document, once submitted to the Planning Inspectorate, will be tested on a number of things, and one of the requirements is that the document, and subsequently the selected sites, be deliverable. There is ongoing communication between the Council, service providers and potential developers in order to ensure that the sites are deliverable. The Council will only allocate land to accommodate the housing that is required – additional Green Belt land will not be reallocated as residential.</p>

Issue Raised	Initial Officer Comments
How is the term ‘the site has good access’ quantified and determined?	The level of accessibility is dependant upon a range of factors including access to services and facilities, and the highway network. The term “good access” has been used where appropriate to highlight good locations for development., though many other issues are also taken into account.
How can the impact of any development at any of the locations be assessed when there has been no assessment of the impact on local facilities, including local post offices, community facilities, leisure centres, electricity supplies, water supplies, recycling bin availability, among others identified?	The Council has assessed the impact of new development on local services and set out in the Core Strategy a range of measures which will be required within each general location for development. Furthermore the Council continues to liaise with service providers to ensure that water, waste and other facilities have the capacity to meet development needs.
How can a Green Belt boundary be termed “defensible” as it has been made evident that the boundary can be amended when required?	The term ‘defensible’ does not mean that a boundary will not be changed. Rather it means that where a plan has been properly prepared with long-term Green Belt boundaries, those boundaries should be defensible. The Council needs to provide a balance between providing homes to meet the housing need, and protecting the environmental characteristics of the District.
The natural streams and brooks that exist within the District have not been accounted for within the document, and as these remove a large amount of the surface water within the District, and flood regularly as a result, the impact on them must be assessed thoroughly.	This is not correct. Developments are required to take flooding issues into account and where necessary Strategic Flood Risk Assessments will be carried out, and to mitigate against the impact of new development on the environment, including natural streams and brooks and surface water, it is a requirement that new developments provide Sustainable Drainage Systems (SUDS).

Issue Raised	Initial Officer Comments
Residents have paid a premium to live with views of the Green Belt and development of sites overlooked by dwellings will have a negative impact on the quality of life of residents. It was asked whether the council will compensate residents for this loss of view, and what the Council plan to do to ensure that the mental health of residents is not affected in any way.	There is no legal right to an uninterrupted view of the countryside and the allocation of land within the Development Plan does not affect this. The development of new residential dwellings will require planning permission and, in considering applications, the Council will have regard to the impact of any proposals on the amenity of the occupiers of neighbouring homes, i.e. issues such as overlooking will be addressed through the planning application process.
Why are details of the proposed housing was not shown? (e.g. types of housing, dwelling footprints etc).	The purpose of the Allocations DPD is to allocate land use within the District. Design principles and standards, layout of housing, use of materials and so will be dealt with through the preparation of design briefs informed by the policies set out in the Development Management DPD, and through consultation with specialists through the planning application process.
A definition is required of the highway network, and of the term 'excellent accessibility'.	The highway network can be defined as a total system of highways, roads, streets, bridges, tunnels, and related facilities. The level of accessibility is dependant upon a range of factors including access to services and facilities and the highway network.
The Council has not assessed the cumulative impact of the developments across the District on the highway network.	Essex County Council as the highways authority have been closely consulted throughout the process of the Core Strategy DPD and the Allocations DPD and as such have considered the cumulative, and individual, impact of the developments across the District on the highway network. The exact highway improvements will be determined at a later stage of document production process, when the exact sites have been assessed and selected. The consideration of potential sites will include views from the Highways Authority. Once the sites have been selected, the highways authority will be consulted to ascertain the exact highways requirements. This will be done on an individual location basis and on a cumulative basis which will assess the impact of the cumulative development

Issue Raised	Initial Officer Comments
Support is given to the identification of South Hawkwell as a location for new housing as this accords with the emerging Core Strategy and is a sustainable location for growth. The table in the introduction should make clear that housing numbers are a minimum.	Comment noted. Overall housing numbers are a minimum, as set by the East of England Plan. However, in respect of the allocation of land, it is however important that Green Belt land is only allocated for residential where required.
The impact additional dwellings would have on infrastructure and services within the District, including health services, schools, amenities and highways.	Comments noted. Any impact will be mitigated against and the Council are working with service providers to ensure all the sites are deliverable, and that additional infrastructure is provided to serve the additional development.
The assumptions made in relation to the deliverability/developability of the sources of housing land supply are over-ambitious, and fail to show how contingencies will be handled over the Plan period. Furthermore, the nine general locations identified for extensions to residential envelopes fail to promote new housing development in the most sustainable locations. There should be a higher quantum of development in the Tier 1 settlements in the first instance, and further land should be identified in the Allocations DPD to meet the proposed short-fall, and create a more sustainable pattern of development, than that proposed.	These comments are not accepted. Sustainability Appraisals have been carried out on all stages of the Core Strategy. At the Core Strategy Issues and Options stage several options were considered including higher quantum of developments in Tier 1 settlements, a new developments encompassing all required dwellings, and spreading the housing equally throughout the District. It was found through the Sustainability Appraisal that these options were not considered to be as sustainable as the approach that has now been taken. As identified within the Strategic Housing Land Availability Assessment, there are available sites within the general locations identified capable of meeting at least the number of dwellings stipulated.
A respondent questioned why the smaller villages of Paglesham, Fambridge, Stambridge, etc. are not mentioned – it was suggested there is potential for some small development in these areas in order to build a more viable community.	These villages have been defined in the Core Strategy as Tier 4 settlements where development is considered to be unsustainable. The general locations identified in the Core Strategy are supported by a Sustainability Appraisal.
The Core Strategy recognises that 2745 dwellings will have to be provided on land which is currently allocated as Green Belt by 2025, but the totals in the table on Page 4 equate to 2785; which figure is correct? It was suggested that the dwellings allocation needs to be recalculated to confirm correct figures together with reviewing the 9 general locations.	The figure of 2745 refers to the number of dwellings required to be provided once deliverable, non-Green Belt sites have been accounted for. This figure is a minimum, and in addition the plan is required to have a degree of flexibility, hence the total of 2785 dwellings in the table on Page 4 of the consultation document.

Issue Raised	Initial Officer Comments
'Phasing' should be removed from the Core Strategy and the sites should be allowed to come forward as they become available in order to ensure a greater certainty of achieving a continuous supply of land for housing delivery.	Phasing has been included to ensure that brownfield sites come forward, wherever possible, before Green Belt sites. There has been an assessment in the Annual Monitoring Report which shows that the Council will have a continuous supply of housing.
Housing could be an option to replace the Eon site.	Yes, this is agreed. The former Eon site on London Road, Rayleigh is within an existing residential area. As such, the existing allocation of land (as set by the Rochford District Replacement Local Plan (2006)) would not oppose residential redevelopment of the site. If the site were to be developed for housing, it would constitute a windfall site.
The allocation sites feeding onto Rawreth Lane will significantly damage the Green Belt status of this land and overload the existing inadequate infrastructure.	<p>The amount of Green Belt land allocated for housing will be limited to that required to meet the District's housing requirement. The vast majority of the Green Belt will remain allocated as such.</p> <p>Rochford District Council is working closely with Essex County Council as the highway authority to ensure that any negative impacts on the highway network are mitigated against.</p>
<p>The consultation on the Allocations DPD 'Discussion and Consultation' Document is both premature and inappropriate prior to the receipt of the Inspector's Report on the Rochford Core Strategy.</p> <p>No further work should be undertaken on the Allocations DPD until the Core Strategy is adopted. The proposed provisions of the Allocations DPD can then be reassessed to ensure that it accords with the finalised Core Strategy in terms of the level of greenfield land release and the size and distribution of strategic sites.</p>	The Allocations Document is a separate document to the Core Strategy, and as such will undergo a separate consultation process. One of the stipulations is however that the Allocations DPD be in conformity with the Core Strategy. The Rochford District Core Strategy has now been adopted, with strategic policies for housing development as per the version of the Core Strategy submitted for examination. The Allocations DPD will conform to the Core Strategy.
Concern about the proposed loss of Green Belt.	The Council is aware of these concerns, and will only release Green Belt where absolutely necessary. The total amount of Green Belt proposed for release is less than 1% of the Green Belt within the District.

Issue Raised	Initial Officer Comments
There are more suitable locations for housing to be developed within the District.	As part of the Core Strategy, several Sustainability Appraisals have been carried out to help ascertain where the most suitable and sustainable locations are and it is the Council's opinion, justified by the Sustainability Appraisals, that the most suitable locations are those which have been selected.
SHLAA	
<p>Currently infrastructure is inadequate and further development would exacerbate the situation.</p> <p>How are infrastructure improvements to be funded; what improvements will be required and delivered?</p>	<p>Rochford District Council is working closely with Essex County Council as the highway authority to ensure that any negative impacts on the highway network are mitigated against. Infrastructure providers have been consulted throughout the development of the Core Strategy and on this document. The District Council is working closely with them to ensure that the options taken forward are viable, deliverable, and that any negative impacts are mitigated. Appendix H2 of the Core Strategy outlines the infrastructure requirements that are necessary before development takes place.</p> <p>Detailed proposals, including funding, will be assessed and published at a later stage of the Allocations DPD and through the Planning Application process.</p>
Brownfield sites are previously developed land and as such their redevelopment will have no adverse impact on the Green Belt.	Yes, agreed in principle. However, it should be noted that Green Belt is a planning designation and not a description of land. As such land may be brownfield/previously developed and in the Green Belt.
Essex County Fire and Rescue Service commented that they have determined that none of the proposed sites pose a problem to the Fire and Rescue Service and as such they have no comment on the Allocations Development Plan Document.	Comment noted.

Issue Raised	Initial Officer Comments
North of London Road – NLR1	
<p>Studies must be carried out to determine the impacts on the Rayleigh area. This should include but not be limited to schools, roads (RDC & ECC responsibility), doctors, dentist, increase parking in Rayleigh town centre, station access and parking. The total plan must then be costed and incorporated into the development plans, this document should be submitted for public consultation. This will stop fragmented development.</p>	<p>Infrastructure and service providers have been engaged in the process so that the impact on infrastructure and services is accounted for. A range of costs for infrastructure provision has been presented at the Core Strategy stage.</p> <p>The Council will prepare a document that sets out charges for developers to contribute to the delivery of new infrastructure.</p> <p>At this stage of the document the options are at the initial stage, and were presented for discussion. A sustainability appraisal, which provides an analysis of the economic, social and environmental impacts of proposals, will be produced and published prior to the next round of consultation.</p>
<p>This area may be a flood zone and flooding in the area would worsen.</p>	<p>The Council recognises that flooding is a significant issue within the District, and as such, has sought to direct development away from the areas most vulnerable. The sites which have been considered within the document are considered to be the most sustainable given the alternatives. Any areas that are within flood Zone 2 or 3 (as defined by the Environment Agency) will undergo a Strategic Flood Risk Assessment and must mitigate against any flooding issues before any development can be permitted. Areas within the flood zone will be used for non-vulnerable uses, and the development must also provide Sustainable Drainage Systems to alleviate flooding issues. Surface water flooding has been considered within the Core Strategy DPD and all residential development over 10 units will be required to incorporate runoff control via sustainable drainage systems (SUDS) to ensure runoff and infiltration rates do not increase the likelihood of flooding</p>

Issue Raised	Initial Officer Comments
	As set out in the Core Strategy, all residential development over 10 units will be required to incorporate runoff control via sustainable drainage systems (SUDS) to ensure runoff and infiltration rates do not increase the likelihood of flooding.
The Council should produce a separate document detailing infrastructure requirements and how these will be funded.	The strategic issues in relation to the provision of transport infrastructure are addressed in the Core Strategy. The Council intend to produce a Transportation SPD which will deal with these issues in detail. The Council has worked closely with service providers to ensure that the developments are deliverable and will not have any negative impact on infrastructure and service provision. The Council also intends to prepare a document setting out charges for developers to contribute to the delivery of new infrastructure.
No defensible Green Belt boundary to the south of the site, and not clear how a link could be provided between Rawreth Lane and London Road.	Whilst the concerns are noted, the Council does not intend to allow any site to be developed without careful consideration being given to the need for defensible boundaries. The document identified a range of potential site options for each general location identified in the Core Strategy DPD. Those sites which are less likely to be able to provide a defensible Green Belt boundary were identified in the document. Further detail will be provided within the next version of the Allocations DPD.
Other locations that are not within flood zone should be considered as an alternative.	There is no intention of allowing any built development on any land within a flood zone in this location. The Council recognises that flooding is a significant issue within the District, and as such, has sought to direct development away from the areas most vulnerable. Some land in this area is within the flood zone but will only be used, if required for non-vulnerable uses, open space, for example. New built development must include Sustainable Drainage Systems to alleviate flooding issues. Surface water flooding has been considered within the Core Strategy DPD.

Issue Raised	Initial Officer Comments
Chelmsford Borough Council commented that residents in Battlesbridge could benefit from the new community services and facilities as part of the development although they note there is a number of existing site constraints.	Comment noted.
Concern regarding the loss of Green Belt and countryside.	Comment noted. The Council will seek to release the minimum amount of Green Belt necessary to meet the future housing needs of the District. See comments above.
NLR1 appeared to be the most suitable place to support 550 new dwellings; reasons cited including that it is next to existing residential development, near transport links, and not on the already busy London Road. Support the creation of 550 new dwellings if the houses built were affordable for first time buyers and not built on top of each other with no open space.	Comment noted.
The sewerage system, and other amenity services are at capacity currently, and the systems would not be able to cope with additional housing.	This is not understood to be the case – the requisite upgrades to such infrastructure will be made where required. The Council are working with service providers to ensure that the developments are deliverable.
Option NLR1 would not allow for a link road between Rawreth Lane and London Road.	Comment noted.
Schools may not have the capacity to support pupils arising from additional housing.	The Council has worked closely with Essex County Council Schools Children and Families service to ensure that schools have the capacity to support increased population, and if not identify appropriate sites to locate new educational facilities, as well as introducing requirements for developers to be required to make financial contributions to the provision of educational facilities where appropriate.
Concern that development in this location would lead to coalescence of Rayleigh and Wickford.	It is considered by the Council that this would not result in coalescence with Wickford as the arrangement of the site would enable the provision of a “green buffer” to the west to prevent this, as identified in Appendix H1 of the Core Strategy DPD.

Issue Raised	Initial Officer Comments
Anglian Water Ltd stated that infrastructure and/or treatment upgrades will be required in order to serve proposed growth.	Comment noted. The Council will work with infrastructure providers and developers to ensure that there is appropriate infrastructure in place in a timely manner to serve any proposed development.
Option NLR1 would have less impact on landscape than other options.	Comment noted.
North of London Road – NLR2	
General on concerns with building on flood zone, and the impact additional dwellings would have on infrastructure, particularly highways and schools, as per comments regarding NLR1.	<p>Flooding is one of the main constraints within the District and as such the Council is working with the Environment Agency to ensure that flooding issues are not worsened in any way.</p> <p>The Council is working closely with infrastructure and service providers to ensure any impact on infrastructure and services is mitigated against.</p>
Concern regarding the loss of Green Belt with this option.	The Council have determined that there is a need to release Green Belt land to support development due to the physical constraints within the District and the limited amount of suitable brownfield land. Green Belt land, however, will only be released for development after previously developed sites have been developed. The Council will minimise the release of Green Belt and mitigate against any negative impacts the release may have.

Issue Raised	Initial Officer Comments
Concern was shown that part of this area is seen to be in Flood Zone.	The Council recognises that flooding is a significant issue within the District, and as such, has sought to direct development away from the areas most vulnerable. The sites which have been considered within the document are considered to be the most sustainable given the alternatives. Any areas that are within flood Zone 2 or 3 (as defined by the Environment Agency) will undergo a Strategic Flood Risk Assessment and must mitigate against any flooding issues before any development can be permitted. Areas within the flood zone will be used for non-vulnerable uses, and the development must also provide Sustainable Drainage Systems to alleviate flooding issues. Surface water flooding has been considered within the Core Strategy DPD and all residential development over 10 units will be required to incorporate runoff control via sustainable drainage systems (SUDS) to ensure runoff and infiltration rates do not increase the likelihood of flooding.
Development of this site would lead to the coalescence of Rayleigh and Rawreth.	The site will include a “green buffer” to reduce the risk of coalescence with Rayleigh and Rawreth, as identified in Appendix H1 of the Core Strategy DPD.
Flexibility needs to be shown with regard to the options in the document and the time periods proposed.	Comment noted. This will be done through the ‘Plan Monitor Manage’ approach.
Anglian Water Ltd commented that infrastructure and/or treatment upgrades will be required to serve the proposed growth in this location.	Comment noted. The Council will work with infrastructure providers and developers to ensure that there is appropriate infrastructure in place in a timely manner to serve any proposed development.
North of London Road – NLR3	
General comments were as per NLR1 and NLR2 regarding loss of Green Belt and agricultural land, impact on schools and infrastructure, particularly highways, and the impact developing this location would have on flooding as part of the site lies within Flood Zone.	Comment noted.

Rochford District Council – Local Development Framework Allocations Document: Consultation Statement

Issue Raised	Initial Officer Comments
Concern that once development starts taking place on Green Belt land, a precedent will be set and there will be further and further development resulting in erosion of the District's Green Belt.	The Council is planning for the long term needs of the District in terms of housing requirements and Green Belt release. The Council will ensure that the minimum amount of Green Belt necessary will be reallocated to meet these needs.
More suitable Brownfield sites had been put forward and these should be considered prior to release of the Green Belt.	Brownfield sites have been considered within the Strategic Housing Land Availability Assessment and the Urban Capacity Study.
Sports facilities will be lost if this option were to be taken forward.	There is no intention for any sports facilities to be lost. The land would be allocated as residential, and as part of the development community and youth facilities need to be provided. This could entail the use of the existing facilities or the development of new, modern replacement facilities.
This site is the worst of all, as it will greet visitors to Rayleigh with a mass of concrete, and obscure the scenic northerly views. It will allow for future development to the north and not create a strong Green Belt boundary.	Comment noted.
Sport England strongly objected as this would include Rayleigh Sports & Social Club's site which is where Rayleigh Town Football Club and Rayleigh Fairview Cricket Club are based. These are two of the principal community sports clubs in the Rayleigh area. Potential redevelopment of the site would result in the loss of the entire playing field (which is large enough to accommodate the equivalent of at least three football pitches and a cricket pitch). No reference is made to the loss of these facilities in the document or to replacement provision being an essential pre-requisite of any development.	Comment noted. It is not intended that there will be any loss of sports facilities within this option. The existing facilities can either be accommodated within the development or new, modern replacement facilities be provided.
Traffic data should be provided for the surrounding routes and an impact assessment carried out to assess the impact of additional housing in the area.	Essex County Council, as the Highway Authority, has been consulted throughout the production of this document. Assessments will be carried out at a later stage once further details of sites have been determined, and such an assessment is then possible.

Issue Raised	Initial Officer Comments
It was stated by Anglian Water that infrastructure and/or treatment upgrades are required to serve proposed growth.	Comment noted. The Council will work with infrastructure providers and developers to ensure that there is appropriate infrastructure in place in a timely manner to serve any proposed development.
Traffic counts along London Road should be carried out, and any traffic data that has already been collated for London Road be published.	Essex County Council, as the Highway Authority, has been consulted throughout the production of this document. Traffic data and impact assessments will be detailed at a later stage of the document, and consulted on.
The Environment Agency comment that this site is least affected by Flood Zone.	Comment noted.
North of London Road – NLR4	
General comments were as per NLR1, NLR2 and NLR3 regarding loss of Green Belt and agricultural land, impact on schools and infrastructure, particularly highways, and the impact developing this location would have on flooding as part of the site lies within Flood Zone	Comment noted. Please see comments above.
Once development starts taking place on Green Belt land, a precedent will be set and there will be further and further development resulting in erosion of the District's Green Belt	This is not correct. Allocating land for development in a development plan does not set a precedent for further land to be released in an unplanned way. Council is planning for the long term needs of the District in terms of housing requirements and Green Belt release. Through the 'Plan Monitor Manage' the Council will ensure that the minimum amount of Green Belt necessary will be reallocated to meet these needs. By reallocating land now, and ensuring an adequate housing land supply as required by government, the vast majority of the Green Belt will remain protected from inappropriate development and a long term defensible boundary will be put in place.

Issue Raised	Initial Officer Comments
Options NLR4 and NLR5 would appear to be the least unfavourable, although still highly unwelcome. This option minimises the loss of agricultural land and to some extent preserves the semi-rural character of this part of Rayleigh. A reduced version of these options combined with redevelopment of the industrial estate could be a reasonable compromise if there is no alternative to development in this area.	Comments noted.
The Environment Agency stated that with this option, the flood zone could act to split the development, however it could also represent an opportunity to integrate the main watercourse (Rawreth Brook) into the development through the inclusion of public open space etc.	Comment noted.
In considering the site specific allocation, the document needs to give greater consideration to (a) the need for flexibility (b) the need for a land allocation of sufficient size to deliver the minimum requirements, and (c) the proper consideration of a long-term and permanent Green Belt boundary which will not be subject to pressure for amendment in the post-plan period. None of the five options are of sufficient size to deliver the Core Strategy requirement. A combination of these options, together potentially with adjoining land, would provide a developable and deliverable site area capable of implementing the Core Strategy.	In the Council's view, the options are large enough to accommodate the number of dwellings specified in the Core Strategy and the requisite infrastructure. It is important to ensure that as much Green Belt as possible is protected, but the view that a larger area should be reallocated to alleviate any possible pressure on the boundary is noted.
Part of the site lies within Flood Zone.	The Council recognises that flooding is a significant issue within the District, and as such, has sought to direct development away from the areas most vulnerable. The sites which have been considered within the document are considered to be the most sustainable given the alternatives. Any areas that are within flood Zone 2 or 3 (as defined by the Environment Agency) will undergo a Strategic Flood Risk Assessment and must mitigate against any flooding issues before any development can be permitted. Areas within the flood zone will be used for non-vulnerable uses, and the development must also provide Sustainable Drainage Systems to alleviate flooding issues.

Issue Raised	Initial Officer Comments
Anglian Water Services Ltd comment that infrastructure and/or treatment upgrades will be required in order to serve proposed growth.	Comment noted. The Council will work with infrastructure providers and developers to ensure that there is appropriate infrastructure in place in a timely manner to serve any proposed development.
North of London Road – Option NLR5	
Sport England strongly objects as this would include Rayleigh Sports & Social Club's site which is where Rayleigh Town Football Club and Rayleigh Fairview Cricket Club are based. These are two of the principal community sports clubs in the Rayleigh area. Potential redevelopment of the site would result in the loss of the entire playing field (which is large enough to accommodate the equivalent of at least three football pitches and a cricket pitch). No reference is made to the loss of these facilities in the document or to replacement provision being an essential pre-requisite of any development. Other respondents echoed these concerns.	Comment noted. It is not intended that there will be any loss of sports facilities within this option. The existing facilities can either be accommodated within the development or new, modern replacement facilities be provided.
Concerns as per NLR1, NLR2, NLR3, and NLR4 in terms of loss of Green Belt, impact on infrastructure, impact on the highway network, and the proximity of the site to Flood Zone.	Comment noted.
Studies should be carried out to assess the impact this potential development will have on the Rayleigh area. This should include but not be limited to Schools, Roads (RDC & ECC responsibility), Doctors, Dentist, Increase Parking in Rayleigh Town Centre, Station access and parking. The total plan must then be costed and incorporated in the development plans, this document should be submitted for public consultation. Hopefully this will stop fragmented development.	<p>Infrastructure and service providers have been engaged in the process so that the impact on infrastructure and services is accounted for. A range of costs for infrastructure provision has been presented at the Core Strategy stage.</p> <p>At this stage of the document the options are at the initial stage, and were presented for discussion. A sustainability appraisal, which provides an analysis of the economic, social and environmental impacts of proposals, will be produced and published prior to the next round of consultation.</p>

Issue Raised	Initial Officer Comments
There are more suitable sites for development located elsewhere in the District, and that Rawreth had been allocated more than other areas in the District.	The Core Strategy has gone through several iterations, examining a number of options for the distribution of development, and each of these has had a Sustainability Appraisal carried out on it. As such, the Core Strategy identifies what are considered to be the most appropriate areas for development. The Allocations DPD looks at specific sites within these locations.
NLR5 is probably the best option because it has a strong defensible boundary and a bus service could be provided between London Rd and Rawreth Lane.	Agreed, that it is important that a defensible Green Belt boundary can be maintained.
Transport opportunities are better with this location as there would be access available to provide a north-south bus route through the site. There was also an opportunity to provide a defensible Green Belt boundary to the west of the site. It was commented that this site would have better integration with the existing settlement than other options put forward in the Allocations DPD.	Comment noted.
Public transport to this location is currently insufficient.	Comment noted. One of the requirements from this site is that public transport infrastructure improvements are provided.
Anglian Water Services Ltd stated that infrastructure and/or treatment upgrades would be required to serve proposed growth at this location.	Comment noted. The Council will work with infrastructure providers and developers to ensure that there is appropriate infrastructure in place in a timely manner to serve any proposed development.
This site would be more suitable than other options due to the ability to provide a north-south bus link, and the natural extension to the existing settlement.	Comment noted.

Issue Raised	Initial Officer Comments
North of London Road – Are these the right options?	
The Rawreth Lane area is already overdeveloped. Only sites with existing industrial useage should be considered for residential development.	Brownfield sites have been assessed in the Employment Land Study and the SHLAA for their suitability and sustainability for residential development. The Core Strategy DPD and the evidence base which supports it justifies why a small amount of Green Belt is required to be reallocated during the plan period.
Until the total development plans and impacts on total infrastructure have been considered, costed and incorporated in the development plans, it is impossible to say which are the right options. General objection to fragmented development.	<p>Infrastructure and service providers have been engaged in the process so that the impact on infrastructure and services is accounted for. A range of costs for infrastructure provision has been presented at the Core Strategy stage.</p> <p>At this stage of the document the options are at the initial stage, and were presented for discussion. A sustainability appraisal, which provides an analysis of the economic, social and environmental impacts of proposals, will be produced and published prior to the next round of consultation.</p> <p>The Development Plan seeks to avoid fragmenting development by ensuring that development is comprehensively planned, which also helps ensure the necessary infrastructure and service accompany new housing.</p>
Alternative options were suggested for consideration.	These will be considered within the next stage of the Allocations DPD.
Industrial areas should be used first for residential development and Green Belt should not be released.	Comment noted. This comment reflects the Council's approach for the future development of the District.

Issue Raised	Initial Officer Comments
Other options have not been properly considered and only larger sites have been properly assessed. No justification has been given as to why the preferred options have been chosen and why other sites were not taken forward.	The Core Strategy DPD considered small sites spread across the District at the Issues and Options stage and the Sustainability Appraisal of this document found that the most sustainable option was several larger sites. The Allocations DPD must conform to the Core Strategy DPD.
None of the options provide the opportunity to create a defensible Green Belt boundary.	The provision of a “green buffer” or “green stopper” to the west of these options would ensure that a defensible Green Belt boundary could be maintained.
Should other sites in this location be considered?	
Several other locations were put forward including several smaller sites, sites with existing industrial usage, additional locations were suggested other than North of London Road.	The Allocations DPD must conform to the general locations identified within the Core Strategy DPD. Additional sites will be considered within the next stage of the Allocations DPD.
The quantity of housing suggested in this location is far too high and should be spread more evenly across the District.	The Council has developed a balanced approach to the provision of housing across the District within the Core Strategy DPD.
West Rochford	
This is not a suitable location for the number of dwellings suggested.	Whilst the comment is noted, no information has been provided to indicate why this is the case. The Core Strategy has gone through several iterations, examining a series of options for the distribution and numbers of development, and each of these has been subject to a Sustainability Appraisal. As such, the Core Strategy identifies what are considered to be the most appropriate areas for development. The Allocations DPD looks at specific sites within these locations. The Allocations DPD must conform to the general locations and numbers of dwellings identified within the Core Strategy DPD.

Issue Raised	Initial Officer Comments
<p>Development in this location would have a major impact on the infrastructure, not just in the vicinity of it but to the whole of Rochford/Hockley. Before any approval is given, studies must be carried out to determine the impacts on the Rochford/Hockley area. This should include but not be limited to schools, roads (RDC & ECC responsibility), doctors, dentists, increase parking in Rochford Town Centre, station access and parking. The total plan must then be costed and incorporated in the development plans, this document should be submitted for public consultation.</p>	<p>There is no disagreement that housing development will have implications for infrastructure and services and that developers should pay the costs. However, infrastructure and service providers have been engaged in the plan making process so that the impact on infrastructure and services is fully accounted for. A range of costs for infrastructure provision has been presented at the Core Strategy stage (Core Strategy Topic Paper 2), and the Council has also committed to preparing a document setting out charges to be paid by developers towards the delivery of required infrastructure.</p> <p>At this stage of the document the options are at the initial stage, and were presented for discussion. A sustainability appraisal, which provides an analysis of the economic, social and environmental impacts of proposals, will be produced and published prior to the next round of consultation.</p>
<p>Development at West Rochford would have less impact on the town centre than other locations in Rochford.</p>	<p>Comment noted.</p>
<p>Development may lead to a separate “town centre” being created.</p>	<p>It is not intended to provide shops or other facilities within the development area, though a new primary school is proposed.</p>
<p>Impact that development at this location would have on Ironwell Lane.</p>	<p>This is an important consideration that will be considered within the next stage of the Allocations DPD and through the assessment of any planning application for development.</p>

Issue Raised	Initial Officer Comments
<p>To locate 600 dwellings in this location will have a major impact on the infrastructure, not just in the vicinity of it but to the whole of Rochford/Hockley. Before any approval is given, studies must be carried out to determine the impacts on the Rochford/Hockley Area. This should include but not be limited to Schools, Roads (RDC & ECC responsibility), Doctors, Dentist, Increase Parking in Rochford Town Centre, Station access and parking. The total plan must then be costed and incorporated in the development plans, this document should be submitted for public consultation. Hopefully this will stop fragmented development.</p>	<p>There is no disagreement that housing development will have implications for infrastructure and services and that developers should pay the costs. However, infrastructure and service providers have been engaged in the plan making process so that the impact on infrastructure and services is fully accounted for. A range of costs for infrastructure provision has been presented at the Core Strategy stage (Core Strategy Topic Paper 2), and the Council has also committed to preparing a document setting out charges to be paid by developers towards the delivery of required infrastructure.</p> <p>At this stage of the document the options are at the initial stage, and were presented for discussion. A sustainability appraisal, which provides an analysis of the economic, social and environmental impacts of proposals, will be produced and published prior to the next round of consultation.</p>
<p>Development at this location would result in unnecessary loss of Green Belt, loss of prime agricultural land, disruption at the railway bridge junction at Hall Road as a result of additional traffic, and have a negative impact on the Conservation Area of Rochford.</p>	<p>As identified within the Core Strategy, some Green Belt land is required to be allocated for development in order for the District's housing requirement to be met.</p> <p>The majority of land surrounding Rochford is Grade 1 Agricultural Land. Land to the west is a mixture of Grade 1 and Grade 2; land to the east is predominantly Grade 1 with the exception of the area of non-agricultural land occupied by an industrial estate. Agricultural land classification is only one consideration in determining the most sustainable locations for development.</p>

Issue Raised	Initial Officer Comments
	<p>The Rochford Conservation Area Appraisal and Management Plan states that 'Until the first half of the 20th century, Hall Road was undeveloped. It still has a rural feel to it, to which the trees along it make a significant contribution, and forms an attractive approach to the town and conservation area.' It recommends that further suburbanisation of the road should be avoided in order to preserve the existing approach to the town and the setting of Rochford Hall, which is a grade I Listed Building to the south east of the site ('Rochford Hall and ruins'). There are other Listed Buildings in proximity to the site, including a grade II* Listed Building ('Church of St. Andrew') and a grade II listed milestone ('Milestone on northern verge opposite house called Birches, Hall Road'), as well as other listed items. It is relevant to note that there is residential development to the south of Hall Road and close to the Conservation Area. There is also already residential development to the north of Hall Road. The frontage of Hall Road in this location will need to be carefully considered with any development, for example through the retention of existing hedgerows and the siting of the proposed public open space. Development would not intrinsically have a negative impact on the Conservation Area.</p> <p>The Council has worked closely with infrastructure and service providers to ensure that issues such as the impact on the highway network can be addressed for a site coming forward within this location. Feedback from infrastructure and service providers will be used to help determine the most suitable sites, and the planning obligations that developers will be required to meet.</p>
This location would be suitable for additional development due its location and accessibility to the highways network.	Comment noted.
The cumulative impact of development at the locations proposed in the Allocations DPD.	This was considered at the Core Strategy stage when the general locations were identified.

Issue Raised	Initial Officer Comments
The rural nature of the area would be lost if development at this location takes place.	Comments noted. The Council are committed to ensuring Green Belt is only reallocated for development when required, and to ensure the vast majority of the Green Belt remain as such. The final Allocations Development Plan Document will set out requirements for developments for sites identified which will address issues such as the impact on the character of the area.
Archaeological surveys would need to be undertaken prior to any development taking place.	Comment noted.
West Rochford – WR1	
Existing highway and infrastructure is already over capacity in Rayleigh, Rochford and nearby Southend. Any development must provide mitigation against its impact.	The principle of 600 additional dwellings being directed to West Rochford has already been determined through the Core Strategy, and Essex County Council Highways are satisfied with this approach. The Council recognise that improvements to highways are required. The precise nature of improvements required will be dependent on the final site identified, and the Council will continue to work with Essex County Council Highways to ensure the final site allocated is the most suitable, and to identify the detailed highway improvements required.
The location of the development would not facilitate cohesion with the existing settlement and instead two distinct communities would be created.	The site option WR1 is immediately adjacent to the existing, established community. Development at this location would have the potential to integrate with the existing community. It would be important to ensure that any development of this site is designed in such a way as to provide links between the new development and existing built environment to the east, to ensure the new development is not segregated from the existing community.
The cumulative impact of the London Southend Airport Joint Area Action Plan development and development at this location.	The cumulative impacts of employment and housing developments was considered through the Core Strategy.

Issue Raised	Initial Officer Comments
Anglian Water Services Ltd that there is currently capacity available to serve proposed growth at this location.	Comment noted.
It is better to develop outside the current town boundary, thereby resulting in less congestion in town.	Comment noted. The Council will have to consider a number of factors in determining the most appropriate sites within this general location. The Sustainability Appraisal of the options will address these in detail. In general however, the option of directing development away from the existing town and to an isolated, detached site performs poorly when assessed against social, economic and environmental factors.
The Environment Agency note that there is a small area of Flood Zone 2 associated with the north eastern corner of the proposed site.	Comment noted. The area at risk of flooding is such that the residential development and school could be accommodated in the site on land outside of the Flood Zone. Areas within the flood zone will be used for less vulnerable uses and/or water-compatible development such as open space. The development must also provide Sustainable Drainage Systems to alleviate flooding issues.
The District needs new houses, and the new houses are targeted for first time buyers and young professionals, then this location, near Rochford train station and near existing residential settlement appears to be a good location as many commuters will be able to walk to the station rather than further congest the roads.	Comment noted.
West Rochford – WR2	
Anglian Water Services Ltd state that there is capacity available to serve the proposed growth.	Comment noted.

Issue Raised	Initial Officer Comments
Concerns expressed with regard to loss of Green Belt and agricultural land, impact on infrastructure particularly the highway network, and the impact on services.	<p>The majority of land surrounding Rochford is Grade 1 Agricultural Land. Land to the west is a mixture of Grade 1 and Grade 2; land to the east is predominantly Grade 1 with the exception of the area of non-agricultural land occupied by an industrial estate. This option encompasses Grade 1 and 2 Agricultural Land. Agricultural land classification is one consideration in determining the most sustainable locations for development.</p> <p>New infrastructure will be required to be implemented alongside new development, as identified in the Core Strategy.</p> <p>Impact on infrastructure has been considered at the Core Strategy stage. However, it should be noted that this option, being detached from the existing town and further from the train station and town centre, has the potential to generate a greater number of car journeys than other options within this location.</p>
Community cohesion would be difficult between the new development and the existing community and two separate communities would be formed.	Comment noted. The separation of the site from Rochford would make the integration of the new development with the existing community challenging.
West Rochford – WR3	
Anglian Water Services Ltd state that there is capacity available to serve the proposed growth.	Comment noted.
General comments were as per WR1 and WR2 with regard to loss of Green Belt and agricultural land, impact on infrastructure particularly the highway network, and the impact on services such as Doctors and Dentists.	This option is on grade 1 and 2 Agricultural Land (SEA Baseline Information Profile). The majority of land surrounding Rochford is Grade 1 Agricultural Land. Land to the west is a mixture of Grade 1 and Grade 2; land to the east is predominantly Grade 1 with the exception of the area of non-agricultural land occupied by an industrial estate. Agricultural land classification is one consideration in determining the most sustainable locations for development.

Issue Raised	Initial Officer Comments
	New infrastructure will be required to be implemented alongside new development, as identified in the Core Strategy.
There will be difficulties in providing a defensible Green Belt boundary to the north with this option.	Comment noted. It is important that a defensible Green Belt boundary can be maintained in the future. The Council will ensure that any sites identified in the next stage of the Allocations DPD can provide this.
West Rochford – WR4	
Anglian Water Services Ltd state that there is capacity available to serve the proposed growth.	Comment noted.
General comments were as per WR1, WR2 and WR3 with regard to loss of Green Belt and agricultural land, impact on infrastructure particularly the highway network, and the impact on services such as Doctors and Dentists.	<p>This option is on grade 1 and 2 Agricultural Land (SEA Baseline Information Profile). The majority of land surrounding Rochford is Grade 1 Agricultural Land. Land to the west is a mixture of Grade 1 and Grade 2; land to the east is predominantly Grade 1 with the exception of the area of non-agricultural land occupied by an industrial estate. Agricultural land classification is one consideration in determining the most sustainable locations for development.</p> <p>New infrastructure will be required to be implemented alongside new development, as identified in the Core Strategy.</p>
There will be difficulties in providing a defensible Green Belt boundary to the north with this option.	Comment noted. It is important that a defensible Green Belt boundary can be maintained in the future. The Council will ensure that any sites identified in the next stage of the Allocations DPD can provide this defensibility.
The Environment Agency note that this option minimises flood risk issues.	Comment noted.
This option would result in ribbon development along Hall Road.	Comment noted.

Issue Raised	Initial Officer Comments
This option is not in accordance with guidance issued in Planning Policy Statement 12: Local Development Frameworks.	Planning Policy Statement (PPS) 12 sets out government policy on producing Local Development Frameworks. The PPS explains what local spatial planning is, and how it benefits communities. It also sets out what the key ingredients of local spatial plans are and the key government policies on how they should be prepared. The PPS is primarily concerned with how Development Plan Documents are produced, rather than their contents. This option does not conflict with the guidance in PPS12
West Rochford – Are these the right options?	
These are not the best options; full costed studies had not been carried out to determine total infrastructure impacts to the area and there was no explanation as to how infrastructure improvements would be funded.	Detailed assessments will be carried out at a later stage of the Allocations DPD. Assessments have been carried out on each of the options and the Council has worked with service providers to ensure that sites are deliverable, and infrastructure can accommodate them.
Brownfield sites would be more suitable and Green Belt land should not be released.	Brownfield sites have been assessed in the Employment Land Study and the SHLAA for their suitability and sustainability for residential development. The Core Strategy DPD and the evidence base which supports it justifies why a small amount of Green Belt is required to be reallocated during the plan period.
Development of these options would exacerbate existing traffic issues.	The general locations have been determined in conjunction with Essex County Council who are the highways authority for the District. Improvements to the highway network have been identified in the Core Strategy DPD.

Issue Raised	Initial Officer Comments
West Rochford – Should other sites in this location be considered?	
Only brownfield sites and sites used for existing industrial usage should be developed.	Brownfield sites have been assessed in the Employment Land Study and the SHLAA for their suitability and sustainability for residential development. The Core Strategy DPD and the evidence base which supports it justifies why a small amount of Green Belt is required to be reallocated during the plan period.
This location should not be considered at all, and smaller sites across the District should be considered instead of larger sites.	The Core Strategy considered small sites spread across the District at the Issues and Options stage and the Sustainability Appraisal of this document found that the most sustainable option was several larger sites. The general locations identified in the Core Strategy and subsequently the Allocations DPD: discussion and consultation document are supported by Sustainability Appraisal and are considered to be the most sustainable given the alternatives.
The area should be extended slightly.	Comment noted.
West Hockley	
This area is totally wrong for a major development of 50 dwellings. All roads that surround these sites are totally unsuitable to support the development. Folly Lane, Fountain Lane and Church Road, are narrow and are currently not able to support further traffic. These roads are already being used to excess to avoid the congestion on the B1013 from Rayleigh to Hockley, which is claimed to be running at capacity.	The general locations have been identified through the Core Strategy. The impact on highways will be addressed in conjunction with Essex County Council Highways – mitigation and improvements will be provided where necessary.
Development must be of a high standard, and it must be verified that the highway network has capacity for additional dwellings prior to development taking place.	Comment noted.

Issue Raised	Initial Officer Comments
<p>Development of any additional housing in the area is not supported for the following reasons:</p> <ul style="list-style-type: none"> There is no proposed solution to traffic issues on the already busy roads around Church Road, Folly Lane and Fountain Lane, which are dangerous, narrow, winding and used by many horse riders. There is no proposed solution to traffic issues at Hockley primary school caused by 'school runs' due to the additional children <p>However, if development is enforced, then Option WH2 (mushroom farm – brownfield site) is preferred as it avoids the loss of Green Belt and open spaces.</p>	<p>The development of additional dwellings in this general location was determined through the Core Strategy, which was produced with the involvement of Essex County Council Highways.</p> <p>Highway improvements will be required for development in this location – as stated within the Core Strategy.</p> <p>In identifying the most suitable site to be allocated, impact on the highway network will be a consideration (having regard to representations from Essex County Council Highways).</p> <p>Comments noted with regards to WH2. However, it should be noted that although Option WH2 is not greenfield, it is still allocated as Green Belt. Greenfield is a description of land, whereas Green Belt is a planning policy designation.</p>
<p>The land surrounding Hockley Primary School is used by the pupils of the school for educational walks.</p>	<p>Comment noted.</p>
<p>The area of search for an allocation of 50 dwellings to West Hockley is too narrow. It is suggested that the broad area of interest be extended to include a greater extent of land to the west of Hockley.</p>	<p>Comment noted. Alternative sites put forward which could be considered commensurate with the West Hockley general location will be considered.</p>
<p>The Hockley Parish Plan clearly states that large development in Hockley is not supported.</p>	<p>The Hockley Parish Plan is part of the evidence base for the Local Development Framework.</p>

Issue Raised	Initial Officer Comments
	<p>The Hockley Parish Plan states that, apart from starter homes, there is very little support for additional housing. The Parish Plan states that if development cannot be avoided in Hockley, it should be directed to existing residential or industrial sites and accompanied by the required infrastructure. The Council have sought to explore opportunities for utilising existing residential and employment sites for development – as set out in the Strategic Housing Land Availability Assessment and which will be addressed through the Hockley Area Action Plan – but the requirement to reallocate Green Belt land to meet the District's needs remains.</p> <p>As part of the balanced approach set out in the Core Strategy, Hockley has been allocated development to meet the District's housing needs.</p>
West Hockley – WH1	
<p>The development of any additional housing in the area is not supported for the following reasons:</p> <ul style="list-style-type: none"> There is no proposed solution to traffic issues on the already busy roads around Church Road, Folly Lane and Fountain Lane, which are dangerous, narrow, winding and used by many horse riders. There is no proposed solution to traffic issues at Hockley primary school caused by 'school runs' due to the additional children 	<p>If this site were to be allocated for residential development, highway improvements would be required, as acknowledged in the Core Strategy. The Council have engaged with Essex County Council to ensure that any site allocated will be acceptable from a highways perspective. The details of any improvements would be determined in collaboration with Essex County Council Highways if the site were to come forward.</p>
<p>Folly Chase is a private road and as such development would not be sustainable if this route was used as an access point.</p>	<p>Comment noted. This would be addressed in conjunction with Essex County Council Highways.</p>
<p>Essex County Council indicated that an archaeological investigation would be required.</p>	<p>Comment noted.</p>

Issue Raised	Initial Officer Comments
Access and egress from the site will impact on traffic movements.	Comment noted. This would be addressed in conjunction with Essex County Council Highways.
West Hockley – WH2	
This will require builders of the highest integrity and not the shoddiest of big national housebuilders. The highest quality materials and most generous dimensions should be enforced by RDC, who should refuse a blanket of white up.	The design of any development coming forward will be managed through the development management process.
Object to the release of Green Belt and the quantum of houses suggested.	The Core Strategy DPD and the evidence base which supports it justifies why a small amount of Green Belt is required to be reallocated during the plan period. Furthermore as part of the balanced approach set out in the Core Strategy Hockley has been allocated development to meet its needs.
There are not enough options, just variations on one option.	Comment noted. Any alternative sites put forward will be assessed and the results published.
West Hockley – WH3	
General comments were as per WH1 and WH2 regarding concern over loss of Green Belt, impact the additional dwellings will have on the highway network, the impact the additional dwellings will have on the rural character of the village, and the loss of footpaths around Hockley Primary School.	<p>This option entails the reallocation of less Green Belt land than other options. However, unlike other potential sites, Option WH3 is entirely greenfield. Furthermore, it encroaches further north into the Green Belt than other options.</p> <p>With regards to footpaths, a public footpath runs along the western edge of the site, and if this site were to come forward for development, the footpath could remain.</p>
It was noted that the site is used for agricultural purposes including growing crops.	Comment noted.

Issue Raised	Initial Officer Comments
Access to the site is of concern.	Comment noted. It is acknowledged that vehicular access in particular to the site may be challenging.
No defensible Green Belt boundary with this option.	Comment noted. It is important that a defensible Green Belt boundary can be maintained in the future. The Council will ensure that any sites identified in the next stage of the Allocations DPD can provide this defensibility.
Anglian Water Services Ltd state that infrastructure and/or treatment upgrades would be required to serve the proposed growth.	Comment noted. The Council will work with infrastructure providers and developers to ensure that there is appropriate infrastructure in place in a timely manner to serve any proposed development.
West Hockley – WH4	
General comments were as per WH1, WH2 and WH3 regarding concern over loss of Green Belt, impact the additional dwellings will have on the highway network, the impact the additional dwellings will have on the rural character of the village, and the loss of footpaths around Hockley Primary School.	<p>Option WH4 is entirely greenfield. However, it does not encroach into the open countryside to the north as much as other options.</p> <p>With regards to footpaths, a public footpath runs along the western edge of the site, and if this site were to come forward for development, the footpath could remain.</p> <p>The Council are working closely with Essex County Council Highways to ensure that any sites allocated reflect the impact on highways, and that any impact is mitigated.</p>
The use of Folly Chase as an access point.	Comment noted.
It would be difficult to provide a defensible Green Belt boundary to the north of the site.	Comment noted. It is important that a defensible Green Belt boundary can be maintained in the future. The Council will ensure that any sites identified in the next stage of the Allocations DPD can provide this.

Issue Raised	Initial Officer Comments
Anglian Water Services Ltd state that infrastructure and/or treatment upgrades would be required to serve proposed growth.	Comment noted. The Council will work with infrastructure providers and developers to ensure that there is appropriate infrastructure in place in a timely manner to serve any proposed development.
West Hockley – WH5	
It is better to develop larger sites than infill sites in town centres.	Comment noted. Any development within the centre of Hockley, however, will be determined through the Hockley Area Action Plan.
This would be a more suitable option as there was existing access to the site, and did not utilise Green Belt land.	Comment noted.
The impact additional dwellings would have on the highways network.	The Council are working closely with Essex County Council Highways to ensure that any sites allocated reflect the impact on highways, and that any impact is mitigated.
Anglian Water Services Ltd state that infrastructure and/or treatment upgrades would be required to serve the proposed growth.	Comment noted. The Council will work with infrastructure providers and developers to ensure that there is appropriate infrastructure in place in a timely manner to serve any proposed development.
This option is supported.	Comment noted.
West Hockley – Are these the right options?	
No development should be allowed that impacts on Green Belt land.	The Core Strategy DPD and the evidence base which supports it justifies why a small amount of Green Belt is required to be reallocated during the plan period.

Issue Raised	Initial Officer Comments
Hockley should not be a location for additional development as the highways network is at capacity, and additional development would have a negative impact on the rural character of the area.	Transport is a significant consideration for any of the sites that have been taken forward within the Allocations DPD. The impact of additional development on the area has been considered on a location by location basis, and on a cumulative basis, and Appendix H2 of the Core Strategy outlines the infrastructure requirements that are necessary before development takes place.
The sites within the Allocations DPD were inappropriate and brownfield sites should be used elsewhere in the District.	Brownfield sites have been assessed and considered within the Strategic Housing Land Availability Assessment (SHLAA), and the Council wish to ensure these sites are delivered where possible prior to any Green Belt release through the 'Plan Monitor Manage' approach.
Development should not result in the loss of open space and foot paths utilised by Hockley Primary School.	Comment noted.
West Hockley – Should other sites in this location be considered?	
Only sites with existing industrial usage should be considered.	Comment noted.
No sites in the District should be considered until improvements are made to the highway network.	Improvements to the highway network during the plan period are identified in the Core Strategy DPD. The Core Strategy proposes that developers be required to make financial contributions towards such improvements. As such, it is unlikely to be feasible for infrastructure improvements to come forward independently of development.
Several sites were suggested for further consideration by the Council.	These will be considered within the next stage of the Allocations DPD.
Mixed support for the options of spreading the developments across a number of sites or developing one larger site.	Comment noted.

Issue Raised	Initial Officer Comments
South Hawkwell – 175 dwellings	
Housing need for Hawkwell is less than 175 dwellings, and as such the quantum of housing proposed is unsustainable.	The housing numbers and general locations were determined through the Core Strategy.
The existing highway networks and infrastructure are at capacity and any additional development should mitigate against its impact.	Transport is a significant consideration for any of the sites that have been taken forward within the Allocations DPD. The impact of additional development on the area has been considered on a site by site basis, and on a cumulative basis, and Appendix H2 of the Core Strategy outlines the infrastructure requirements that are necessary before development takes place.
The location has the capacity to accommodate more dwellings than the 175 proposed.	<p>Comment noted. The density of any development will be determined on a site by site basis. However, it is important that not only Green Belt land only be reallocated as necessary, but also that character of the area is respected.</p> <p>Furthermore, the Core Strategy has only accounted for 175 dwellings from Green Belt in this location, and the provision of a greater number may have a destabilising influence on the balanced approach between housing and employment.</p>
The loss of land designated currently as Green Belt.	Comment noted.
Sites proposed in the Allocations DPD are unsuitable, and alternative options were suggested.	These alternatives will be considered within the next stage of the Allocations DPD.
The location is a habitat for Muntjac deer which must be carefully considered.	Comment noted. This would be considered at next stage of the Allocations DPD and through the planning application process.

Issue Raised	Initial Officer Comments
There are empty properties that are not being sold in the area, and it was questioned why therefore there was a need for more dwellings.	The requirements of the East of England Plan are expressed in net additional dwellings, and do not include empty homes. Strategic Housing Market Assessments (which evidence the need for additional homes) consider the number of vacant dwellings in their calculations. It should be noted that the Allocations DPD plan document is seeking to ensure housing provision in the long-term.
Where will the residents of the new dwellings be employed?	The provision of additional employment land is considered within this document and the Core Strategy.
The capacity of existing services such as doctors and dentists.	Comment noted. The Council has been and will continue to work with service providers throughout the development of the Local Development Framework to ensure that infrastructure is provided to meet the needs of the local community.
The location of the development would result in coalescence with Rochford.	Development within the general location would not necessarily engender coalescence with Rochford, given the amount of Green Belt land that would continue to separate the two settlements. The issue of avoiding coalescence is one which must be considered when identifying a specific site for allocation within the general location.
It makes no sense to locate the proposed 175 homes in one of four locations that are all off of Rectory Road, which has an inadequate roundabout at one end and single file under a narrow railway bridge via traffic lights at the other.	Transport is a significant consideration for any of the sites that have been taken forward within the Allocations DPD. The impact of additional development on the area has been considered on a site by site basis, and on a cumulative basis, and Appendix H2 of the Core Strategy outlines the infrastructure requirements that are necessary before development takes place.
Any development would require archaeological investigations.	Comment noted.

Issue Raised	Initial Officer Comments
Only one option with small variation had been put forward and more options should have been considered.	Alternative sites that were previously put forward were considered and an assessment of these is set out in Appendix 1 of the Discussion and Consultation Document. Additional sites that were put forward during consultation on the Discussion and Consultation Document will be assessed, and the results published.
Brownfield sites should have been considered first.	Brownfield sites have been assessed for their suitability for reallocation for residential development within the SHLAA. The Council seek to ensure that such previously developed land is delivered before Green Belt land wherever possible.
The cumulative impact of all the housing across the District should have been considered.	The cumulative impact of all the housing proposed for the future has been considered as part of the development of the Core Strategy DPD. The Allocations DPD is concerned with the specific sites, and must conform to the Core Strategy.
South Hawkwell – SH1	
There is a gas pipe running through the site which would need to be accounted for.	This is correct and would need to be taken into account in the layout of any planning application.
Pressure on infrastructure, loss of Green Belt, coalescence, and an inappropriate location for development.	The Core Strategy considered such issues in determining South Hawkwell as a general location for 175 additional dwellings. There would be no coalescence of settlements arising from development in this location.
The mature trees on the site must be considered.	Yes, absolutely - such issues will be considered at the next stage of the Allocations DPD and through the planning application process.
Anglian Water Services Ltd state that infrastructure and/or treatment upgrades are required to serve proposed growth at this location.	Comment noted. The Council will work with infrastructure providers and developers to ensure that there is appropriate infrastructure in place in a timely manner to serve any proposed development.

Issue Raised	Initial Officer Comments
Coalescence of Hawkwell and Hockley.	Hockley is located to the north of Hawkwell, and the settlements adjoin one another. Development to the south of Hawkwell would not contribute to coalescence of Hockley and Hawkwell.
South Hawkwell – SH2	
Comments on this option were generally as per SH1 with regard to concerns over infrastructure, loss of Green Belt, coalescence, and inappropriate location.	The Core Strategy considered such issues in determining South Hawkwell as a general location for 175 additional dwellings. There would be no coalescence of settlements arising from development in this location.
SH2 would be the preferred option as the wooded area to the north of the site would be retained.	It is agreed that the natural woodland part of this location should be retained and preferably incorporated into the development.
Anglian Water Ltd stated that Infrastructure and/or treatment upgrades are required to serve proposed growth for all sites.	Comment noted. The Council will work with infrastructure providers and developers to ensure that there is appropriate infrastructure in place in a timely manner to serve any proposed development.
Essex County Council stated that archaeological evaluation would be required in this location.	Comment noted.
This option leaves out large areas of woodland and ecology that would otherwise be positively managed should an application be submitted. The lines within option SH2 appear arbitrary. Consideration needs to be given to the relocation of the gas pipeline which extends outside of SH2 to the north and the full extent of the woodland Tree Preservation Order. Unless the full extent of land is included as per SH1 plus the land adjoining Thorpe Road/Close, then any proposals submitted would not be able to properly consider ecology, landscape, pipeline relocation, sustainable drainage or appropriate means of movement.	It is agreed that the natural woodland part of this location should be retained and preferably incorporated into the development.

Issue Raised	Initial Officer Comments
The Environment Agency note that some flood zone is associated with this option, but it represents a better option with regards to flood risk than Option SH1.	Comment noted.
The inclusion of an area of land to the south of Rectory Road would erode the open gap between Hawkwell/Hockley and Southend on Sea which Green Belt in this area seeks to preserve for coalescence reasons. A defensible Green Belt boundary would be difficult to identify. Integration of the area south of Rectory Road would be difficult and so would not be sustainable.	It is not agreed that development in this location will have any impact on the gap or on coalescence between Hockley/Hawkwell and Southend. The Upper Roach Valley is the south and this has been identified as an area where no development should take place. It is important that a defensible Green Belt boundary is identified and maintained when a site is allocated and is not considered to be a problem in this location..
This option excludes large areas of woodland which would result in a lost opportunity for these to be positively managed.	<p>Comment noted.</p> <p>An alternative view expressed was that the omission of these areas would ensure their protection as they would be remain in Green Belt. However, it should be noted that simply because a woodland is in Green Belt, does not mean it is afforded any greater degree of statutory protection – as trees (depending on their status) may be removed outside of the planning process.</p>
Anglian Water Ltd stated that Infrastructure and/or treatment upgrades are required to serve proposed growth for all sites.	Comment noted. The Council will work with infrastructure providers and developers to ensure that there is appropriate infrastructure in place in a timely manner to serve any proposed development.
South Hawkwell – SH3	
Comments on this option were generally as per SH1 with regard to concerns over infrastructure, loss of Green Belt, coalescence, and inappropriate location.	The Core Strategy considered such issues in determining South Hawkwell as a general location for 175 additional dwellings

Issue Raised	Initial Officer Comments
The inclusion of land to the south of Rectory Road would erode the open gap between Hawkwell/Hockley and Southend on Sea which Green Belt in this area seeks to preserve for coalescence reasons.	Comment noted.
Difficult to provide a defensible Green Belt boundary at this site.	Comment noted. It is important that a defensible Green Belt boundary can be maintained in the future. The Council will ensure that any sites identified in the next stage of the Allocations DPD can provide this defensibility.
This option is preferred if development is to happen.	Comment noted.
Anglian Water Ltd stated that infrastructure and/or treatment upgrades required to serve proposed growth for all sites	Comment noted. The Council will work with infrastructure providers and developers to ensure that there is appropriate infrastructure in place in a timely manner to serve any proposed development.
South Hawkwell – SH4	
Comments on this option were generally as per SH1 in regard to concerns over infrastructure, loss of Green Belt, coalescence, and inappropriate location.	The Core Strategy considered such issues in determining South Hawkwell as a general location for 175 additional dwellings. There would be no coalescence of settlements arising from development in this location.
Anglian Water Ltd stated that infrastructure and/or treatment upgrades are required to serve proposed growth for all sites.	Comment noted. The Council will work with infrastructure providers and developers to ensure that there is appropriate infrastructure in place in a timely manner to serve any proposed development.
The inclusion of land to the south of Rectory Road would erode the open gap between Hawkwell/Hockley and Southend on Sea which Green Belt in this area seeks to preserve for coalescence reasons.	It is not agreed that development in this location will have any impact on the gap or on coalescence between Hockley/Hawkwell and Southend. The Upper Roach Valley is the south and this has been identified as an area where no development should take place.

Issue Raised	Initial Officer Comments
Difficult to provide a defensible Green Belt boundary at this site.	It is not accepted that it will be difficult to identify a defensible boundary in this location, but it is accepted that it is important to do so. The Council will ensure that any sites identified in the next stage of the Allocations DPD can provide this.
This option would take the heart out of Hawkwell.	It is not clear what this comment refers to, but the proposed location for development is on the southern edge of the built-up area of Hawkwell.
South Hawkwell – Are these the options that should be considered?	
No options in South Hawkwell should be considered as it is an inappropriate location for housing development.	This comment does not explain why south Hawkwell is an inappropriate location for development, but the Council has developed a balanced approach to the provision of housing across the District within the Core Strategy. This approach is supported by a Sustainability Appraisal and other evidence base documents.
The options proposed are variations of one option and additional locations should be considered.	Comment noted. Additional sites have been put forward as part of the consultation and these will be considered at the next stage of the Allocations DPD.
South Hawkwell – Should other sites be considered?	
No sites within Hawkwell should be considered.	The Council has developed a balanced approach to the provision of housing across the District within the Core Strategy DPD. This approach is supported by a Sustainability Appraisal and other evidence base documents.
Only sites with existing industrial use be considered.	The Core Strategy DPD and the evidence base which supports it justifies why a small amount of Green Belt is required to be reallocated during the plan period.

Issue Raised	Initial Officer Comments
No dwellings should be constructed until infrastructure is upgraded.	The Council will work with infrastructure providers and developers to ensure that there is appropriate infrastructure in place to serve the proposed growth. The Core Strategy proposes that developers be required to make financial contributions towards such improvements. As such, it is unlikely to be feasible for infrastructure improvements to come forward independently of development.
East Ashingdon – 100 dwellings	
The impact increased levels of traffic from new development would have on roads – in particular Brays Lane.	Highway improvements will be required – as set out in the Core Strategy – and the Council will work with Essex County Council Highways to realise these. Since the last round of consultation on the Allocations DPD, a planning application was submitted (ref. 11/00315/OUT) for residential development at a site within this general location, which considered and addressed such issues in detail.
Impact additional residents would have on school places.	The Council has worked closely with Essex County Council Schools Children and Families service to ensure that schools have the capacity to support increased population. Where an increase in capacity has been identified, this has been highlighted in the Core Strategy DPD, and detailed within the Allocations DPD.
A defensible Green Belt boundary was not being provided with some of the options.	Comment noted. It is important that a defensible Green Belt boundary can be maintained in the future. The Council will ensure that any sites identified in the next stages of the Allocations DPD can provide this.
Concern about pedestrian safety in terms of pedestrian access to Brays Lane and Ashingdon Road.	The Council will work with Essex County Council Highways to ensure that any future development includes safe pedestrian access.
Development should not be north of Brays Lane – will not provide a defensible Green Belt boundary and is an unnecessary use of Green Belt land.	Comment noted. It is important that a defensible Green Belt boundary can be maintained in the future. The Council will ensure that any sites identified in the next stages of the Allocations DPD can provide this.

Issue Raised	Initial Officer Comments
Essex County Council state that an archaeological survey would be required.	Comment noted.
East Ashingdon – EA1	
Number of Heavy Goods Vehicles using Brays Lane and how this would integrate with the school and associated pedestrian movements.	The Council will work with Essex County Council Highways to ensure that any future development includes safe pedestrian access and that the new access to the school is appropriate.
Anglian Water Services state that there is capacity available to serve the proposed growth.	Comment noted.
East Ashingdon – EA2	
This location is further from Rochford Town Centre and train station than other options that are being considered for Rochford, which are considered to more sustainable development options.	Whilst the general location of South East Ashingdon is further to the north of the town centre and train station than some of the other options for Rochford/Ashingdon, this area is well located to the parade of shops at Golden Cross. The identification of this general location is supported by a Sustainability Appraisal.
Anglian Water Ltd state that there is capacity available to serve the proposed growth.	Comment noted.
This is the most suitable of the three options identified by the Council. However, the site area is not sufficient to deliver a high quality scheme which meets the Council's standards and wider requirements. The site area should be amended to include additional land to the north.	Comment noted. The Council will ensure a high quality scheme is delivered whilst protecting Green Belt as far as practicable.
East Ashingdon – EA3	
Anglian Water Ltd state that there is capacity available to serve the proposed growth.	Comment noted.

Issue Raised	Initial Officer Comments
Are these sites the most suitable for development in this location?	
Alternative brownfield sites are available that are more suitable.	Brownfield sites have been assessed for their suitability for reallocation for residential development within the SHLAA. The Council seek to ensure that such previously developed land is delivered before Green Belt land.
Several other sites were suggested for consideration as alternatives.	These will be considered within the next stage of the Allocations DPD.
South West Hullbridge – 500 dwellings	
This is an entirely inappropriate development for such a small village. Much of Hullbridge is made up of unmade or unadopted roads that simply could not cope with the demands of traffic. Many roads do not have surface water drains. The village is a mix of old and new properties, an entirely new housing estate on the outskirts of the village would be isolated.	<p>The principle of 500 additional dwellings in South West Hullbridge has already been assessed through the Core Strategy process and found to be a sustainable and appropriate approach when considered against alternatives.</p> <p>It is important that new development is not isolated from the rest of Hullbridge – this will be reflected in the details of any design.</p>
This location would have a negative impact on current residents of Hullbridge in terms of space and views and loss of Green Belt land; loss of wildlife natural habitat; lack of suitable infrastructure including roads, transport, medical facilities, shopping facilities etc; flooding potential.	<p>Although no one has a right to a view over someone else's land, any scheme will be required to be implemented in a manner that gives consideration on the amenity of existing residents, avoids overlooking of private gardens, etc.</p> <p>The area to the South West of Hullbridge is not identified as being of ecological importance. However, any impact identified on wildlife habitats will be required to be addressed.</p> <p>Additional infrastructure will be required to serve any new development in this location, as set out in the Core Strategy.</p>

Issue Raised	Initial Officer Comments
The area needs improvement and investment and the options are supported.	Comment noted.
South West Hullbridge – SWH1	
Concern regarding flooding - the area regularly floods without additional development exacerbating this.	The general location of South West Hullbridge is not situated within an area at risk of flooding as defined by the Environment Agency i.e. flood Zone 2 or 3. Furthermore surface water flooding is now the responsibility of Essex County Council. This issue has been considered within the Core Strategy DPD and Sustainable Drainage Systems will be required within any development coming forward.
The roads are too narrow and many of them are unmade and would not cope with additional traffic movement.	<p>As identified within the Core Strategy, highway improvements will be required for any development coming forward in this general location.</p> <p>The issue regarding narrow unmade roads in Hullbridge is recognised. It may not be appropriate to create new vehicular access from the new development onto the existing road network to the east of the options – depending on the site ultimately identified new vehicular links to the south only may be the most appropriate approach, with pedestrian/cycle links to the east.</p>
The impact this development would have on services including doctor's surgeries, water, electricity, gas, and drainage.	Service providers have been consulted during the preparation of the Core Strategy DPD and this document. The Core Strategy requires new infrastructure to accompany development where required.
That there are no secondary schools in Hullbridge.	The Council has worked closely with Essex County Council Schools Children and Families service throughout the production of the Core Strategy DPD and this document to ensure that schools have the capacity to support increased population, and if not where was the most appropriate site to locate any new educational facilities. Provision for increased capacity at existing secondary schools has also been accounted for.

Issue Raised	Initial Officer Comments
<p>Anglian Water Ltd stated that infrastructure and/or treatment upgrades are required to serve proposed growth.</p>	<p>Comment noted. The Council will work with infrastructure providers and developers to ensure that there is appropriate infrastructure in place in a timely manner to serve any proposed development.</p>
<p>The exact infrastructure improvements required and the specific locations need to be specified within the document.</p>	<p>Comment noted. The general requirements are outlined in Appendix H1 and Policy T2 of the Core Strategy DPD. This will be further developed at the next stage of the Allocations DPD and during the planning application process.</p>
<p>Highway capacity figures are required in order to enable respondents to make a judgement.</p>	<p>Essex County Council monitor highway capacity and publish the information and data through Transport Monitoring Reports. However, the regular monitoring does not include detailed assessment of minor roads within the District.</p> <p>The Council worked with Essex County Council to ensure that the general locations and numbers for housing were acceptable from a highways perspective, and to determine the strategic highway improvements that would be required to accompany development. The specifics of highway improvements will be determined on a site-by-site basis.</p>
<p>How the Council can specify that Sustainable Drainage Systems can be required from development when there are as yet no site plans available.</p>	<p>The requirement to provide Sustainable Drainage Systems (SUDs) to manage surface water is identified in Planning Policy Statement 25: Development and Flood Risk. As such this requirement has been factored into the Core Strategy DPD and this document.</p>

Issue Raised	Initial Officer Comments
South West Hullbridge SWH2	
This option does not enable community cohesion.	The site option SWH2 is immediately adjacent to the existing, established community. Development at this location would have the potential to integrate with the existing community. It would be important to ensure that any development of this site is designed in such a way as to provide links between the new development and existing built environment to the east, to ensure the new development is not segregated from the existing community.
Anglian Water Ltd stated that infrastructure and/or treatment upgrades are required to serve proposed growth.	Comment noted. The Council will work with infrastructure providers and developers to ensure that there is appropriate infrastructure in place in a timely manner to serve any proposed development.
General comments were as per SWH1.	Comment noted.
There is a disproportionate number of dwellings to the current village size.	The Council has developed a balanced approach to the provision of housing across the District which has been outlined within the Core Strategy DPD.
South West Hullbridge – SWH3	
This option is more deliverable, with a smaller impact on the existing village.	Comment noted.
Accessibility to public transport services.	The Core Strategy requires that residential development in this general location be accompanied by public transport improvements and service enhancements.

Issue Raised	Initial Officer Comments
South West Hullbridge – SWH4	
Expected to be less impact on the highway network with SWH4, but traffic and highway issues are still of concern – this is the best option.	<p>Comment noted.</p> <p>Highway improvements will be required for any site coming forward in this location, as proposed in the Core Strategy.</p>
Concern that additional dwellings will result in an increased need to police the area.	Essex Police Authority are consulted on proposed planning policy. As such Essex Police have the opportunity to influence where development will take place and are also aware of potential areas of future development.
Should other locations be considered?	
Several alternative options were put forward for consideration.	These will be considered within the next stage of the Allocations DPD.
Should development be on one site or a selection of sites?	
Opinion was split as to whether development should be on one site or a number of sites.	Comments noted. The advantage of allocating a larger site is that the development can be comprehensively planned, ensuring the required infrastructure and other facilities (in addition to simply housing) is provided within the development. Larger sites are also more likely to be attractive to public transport and other service providers.
South Canewdon – SC1	
Support for this option because it would create an extension to the village community without having a direct adverse impact on access in and around the village as this site would be developed on the two main roads.	Comment noted.

Issue Raised	Initial Officer Comments
<p>Canewdon Parish Council indicated that during a recent survey 79% of villagers in Canewdon do not want new houses built, and say it would spoil our rural environment. If they are to accept new houses on Green Belt land, they must meet the needs of the community, and be affordable to parishioners. The existing sewage, water, electricity and communications networks must all be improved, as well as public transport, schools and doctors surgery provision. We also need road safety improvements at the junction with Canewdon & Ashingdon road for a mini roundabout plus 40 mph speed limits for Lark Hill & Scotts Hall Road.</p>	<p>The Council recognise that many people are opposed to the reallocation of the Green Belt. We strongly support the protection of the Green Belt. However, there are insufficient Brownfield sites within the District to meet projected housing needs, therefore some Green Belt land will need to be released. The balanced approach to housing development set out in the Core Strategy – which includes a small proportion of the District's housing needs being accommodated by development in Canewdon is considered to be the most sustainable and appropriate strategy, and is supported by independent sustainability appraisal (an assessment of the social, economic and environmental implications of policies / strategies).</p> <p>Highway and other infrastructure improvements will be required to accompany any residential development within this location, as set out in the Core Strategy.</p>
<p>Anglian Water Ltd. state that infrastructure and/or treatment upgrades are required to serve proposed growth.</p>	<p>Comment noted. The Council will work with infrastructure providers and developers to ensure that there is appropriate infrastructure in place in a timely manner to serve any proposed development.</p>
<p>South Canewdon – SC2</p>	
<p>Anglian Water Ltd state that infrastructure and/or treatment upgrades are required to serve proposed growth.</p>	<p>Comment noted. The Council will work with infrastructure providers and developers to ensure that there is appropriate infrastructure in place in a timely manner to serve the proposed development.</p>
<p>South Canewdon – SC3</p>	
<p>The appropriateness of splitting development across highways.</p>	<p>Comment noted.</p>
<p>To increase the housing in this area will require the roads to be upgraded as they are at their best rural at their worst damaged and dangerous.</p>	<p>The Council will continue to work with service and infrastructure providers to ensure that these meet the future needs of the local community.</p>

Issue Raised	Initial Officer Comments
<p>Telephone lines require upgrading – better broadband essential.</p> <p>Investment in the public transport system as this is patchy and at rush hour times useless</p>	
<p>Splitting the development over several plots involving several landowners may not be sustainable and would not deliver the additional requirements of infrastructure improvements, etc.</p>	<p>Comment noted. Deliverability is a key issue to demonstrate when identifying sites for future development.</p>
South Canewdon – SC4	
<p>South Canewdon does not have sufficient access to a public transport system, and as such there are concerns over increased traffic within Canewdon and on roads into and out of the village.</p>	<p>The Core Strategy (in which the general locations and numbers of additional dwellings is set out) recognises that public transport provision in Canewdon is generally poor. This is one of the reasons why Canewdon is classified within the Core Strategy's settlement hierarchy as a 'third tier settlement', and why comparatively few dwellings are proposed for the village.</p> <p>The Core Strategy was developed in conjunction with Essex County Council Highways. Highway and public transport improvements will be required to accompany development.</p>
<p>Anglian Water Ltd state that infrastructure and/or treatment upgrades are required to serve proposed growth</p>	<p>Comment noted. The Council will work with infrastructure providers and developers to ensure that there is appropriate infrastructure in place in a timely manner to serve any proposed development.</p>
<p>Opinion was divided as to which of the four sites was more suitable</p>	<p>Comment noted.</p>
Should alternative locations be considered?	
<p>Several alternative options were suggested.</p>	<p>These will be considered within the next stage of the Allocations DPD.</p>

Issue Raised	Initial Officer Comments
South East Ashingdon – SEA 1	
<p>This option is located to the north of Rochford with good links to the town centre and the train station.</p> <p>This option is currently surrounded by residential to the north, south and west and would result in the 'squaring off' of the settlement, which would have a defensible boundary, and coincide with eastern edge of the existing residential areas to the north and south. This would enable the eastern boundary to line up with The Drive (to the south), improving the sites connectivity to the existing areas.</p> <p>There appears to be a contradiction as the text in the final sentence of the last paragraph on Page 44 of the Consultation Document, advises that the proposal does not follow an established boundary so it would be difficult to establish a defensible boundary. However, with this option the eastern boundary of the site could be formed by an area of linear planting, which would also accommodate a Greenway (incorporating pedestrian and cycle routes), linking St Edmunds school (to the north), with the town centre (to the south), improving the accessibility to the school by means other than private car.</p> <p>This option which would generate 500 new dwellings would provide additional customers to the retail premises located to the south on Ashingdon Road.</p>	<p>Comments noted.</p>
<p>Anglian Water Ltd state that infrastructure and/or treatment upgrades are required to serve proposed growth.</p>	<p>Comment noted. The Council will work with infrastructure providers and developers to ensure that there is appropriate infrastructure in place in a timely manner to serve any proposed development.</p>

Issue Raised	Initial Officer Comments
South East Ashingdon – SEA2	
Anglian Water Ltd state that infrastructure and/or treatment upgrades required to serve proposed growth	Comment noted. The Council will work with infrastructure providers and developers to ensure that there is appropriate infrastructure in place in a timely manner to serve any proposed development.
The site size is insufficient to accommodate all 500 dwellings.	Comment noted. The density of any development will be determined on a site by site basis.
Increased traffic movements.	The Core Strategy requires local highway capacity and infrastructure improvements accompany any residential development in this general location, including contribution to traffic management of Ashingdon Road.
The quantum of development proposed is inappropriate as this location, is away from the main public transport routes, key employment areas and key services and as such would result in a significant increase in car movements across the District.	<p>Comments noted. The general location of South East Ashingdon has already been identified and assessed as being appropriate for 500 dwellings. Highway improvements will be required to accompany residential development in this location, as set out in the Core Strategy.</p> <p>However, it is recognised that Option SEA2 – which does not link to existing development to the south – may offer fewer opportunities to provide links to Rochford town centre.</p>
The size of the site would result in a higher density of housing than would be desirable for the location.	Comment noted. The density of any development will be determined on a site by site basis.
This option would not allow for the creation of a defensible Green Belt boundary.	Comment noted. It is important that a defensible Green Belt boundary can be maintained in the future. The Council will ensure that any sites identified in the next stages of the Allocations DPD can provide this defensibility.

Issue Raised	Initial Officer Comments
South East Ashingdon – SEA3	
The settlement is not a primary tier settlement, and as such does not have good access to public transport and other necessary services.	The issue of tiers of settlement was determined through the Core Strategy process. Some of the District's settlements, although they have their own distinct identifies, are not functionally separate from their neighbours and for the purposes of the Core Strategy have been grouped together as one. This includes Rochford/Ashippingdon which is considered a primary tier settlement.
South East Ashingdon – Other comments	
Existing industrial land would be better used for residential settlement.	Existing employment land within the District has been identified for its appropriateness through the Employment Land Study and the SHLAA.
One alternative site suggested in the general location.	These will be considered within the next stage of the Allocations DPD.
West Great Wakering – WGW1	
The land is currently unused, unsightly and is not performing any Green Belt function.	Comment noted.
Anglian Water Ltd comment that there are major constraints to the provision of infrastructure and/or treatment to serve proposed growth.	Comment noted. The Council will work with infrastructure providers and developers to ensure that there is appropriate infrastructure in place in a timely manner to serve any proposed development.
The land south of the High Street (WGW2 (part) is un-used and unsightly land which performs no Green Belt function. The land is well related to the village and enclosed by development on three sides. The site WGW1/2 could be developed to provide 175 dwellings and could be developed along with other land at the disused brickworks and the industrial estate to provide an integrated comprehensive mixed-use scheme including housing, employment, new public open space and a local wildlife site, and would bring environmental benefits to the local community.	Comment noted.

Issue Raised	Initial Officer Comments
West Great Waking – WG2	
Option WG2 comprises two plots. Development of land to the west of Little Waking Road would intrude into open countryside, and would harm the openness of the Green Belt. Its western boundary would not be defensible in PPG2 terms; further westerly expansion of development would be difficult to resist.	Comment noted. It is important that a defensible Green Belt boundary can be maintained in the future. The Council will ensure that any sites identified in the next stages of the Allocations DPD can provide this defensibility.
Anglian Water Ltd. comment that there are major constraints to the provision of infrastructure and/or treatment to serve proposed growth.	Comment noted. The Council will work with infrastructure providers and developers to ensure that there is appropriate infrastructure in place in a timely manner to serve any proposed development.
West Great Waking – WG3	
This option consisted of unconnected plots which would make it more difficult to form a defensible Green Belt boundary and would also be piecemeal development.	Comment noted. It is important that a defensible Green Belt boundary can be maintained in the future. The Council will ensure that any sites identified in the next stages of the Allocations DPD can provide this.
This is low lying ground.	Comment noted. This would have to be considered with any development coming forward.
Suggestions provided to improve the area surrounding the options.	Comment noted.
SHLAA Sites	
Rawreth Industrial Estate	
Rawreth Industrial Estate is already overdeveloped, and so this would be a suitable option for housing, as long as businesses could be relocated.	Comment noted. Rawreth Industrial Estate has been identified as being suitable for reallocation for residential development in the Employment Land Study and the SHLAA. Several options for additional employment land to the west of the District are set out in the discussion and consultation document.

Issue Raised	Initial Officer Comments
This site would be more suitable for residential development than Green Belt land and supported the option.	Comment noted.
The site is in multiple ownership thus the delivery of the site would be more difficult.	The Council acknowledge that the site will not come forward in the early part of the plan period (it is not included in the five-year land supply). Alternative employment land will be allocated and the Council will work with landowners, developers, business representatives and other stakeholders to ensure this is delivered and that displaced businesses are suitable relocated.
The cumulative impact of this suggested option and options for North of London Road.	Comment noted. This has been considered during the development of the Core Strategy DPD and this document through consultation with infrastructure and service providers. Additional infrastructure to support residential development both on Rawreth Industrial Estate and to the North of London Road have been identified within Appendix H1 of the Core Strategy DPD.
The potential loss of business with the redevelopment of this site.	As set out in the Core Strategy, the Council is committed to ensuring that alternative land is available for any businesses displaced, and to assist businesses in relocating. There are concerns with the quality of the layout of the existing industrial estate and it is felt that a purpose-built, planning employment area at an alternative location (but still within the area), and well related to important highway links, will be a significant benefit to businesses in the long-term.
Congestion was seen to be an issue at this location currently and there was concern that this would be exacerbated with the redevelopment of this site and the development of a site at North of London Road.	As set out in the Core Strategy, any residential development of this site will be required to be accompanied by highway improvements.

Issue Raised	Initial Officer Comments
<p>It may be more beneficial to the local area if this site was developed as a mixed use site rather than purely residential.</p>	<p>The Core Strategy requires that the redevelopment of the site be accompanied by the provision of open space and play space. In addition, the Core Strategy encourages small-scale retail development to accompany new residential sites, provided such development serves day-to-day needs of local residents and does not undermine the role of the District's town centres.</p> <p>In respect of a mixed-use development encompassing residential and employment uses, the Core Strategy acknowledges that West Rayleigh is an appropriate area for employment, and that land will be allocated for employment development in that location. However, it is also necessary for this future employment area to be capable of accommodating any businesses displaced by redevelopment of Rawreth Industrial Estate. Some of these businesses are not appropriate to locate adjacent to residential dwellings.</p> <p>Notwithstanding the above, the provision of some commercial development on the site should not be ruled out at this stage. It will however be necessary to ensure that the site can still accommodate its contribution towards the District's housing supply, in the form of a high quality design which makes a positive contribution towards the area's character.</p>
<p>Anglian Water Ltd state that infrastructure and/or treatment upgrades are required to serve proposed growth.</p>	<p>Comment noted. The Council will work with infrastructure providers and developers to ensure that there is appropriate infrastructure in place in a timely manner to serve any proposed development.</p>
<p>Stambridge Mills</p>	
<p>Stambridge Mills is located within a flood zone and this was a major concern.</p>	<p>Stambridge Mills is situated within an area at risk of flooding (flood Zone 2 and 3). Prior to any development coming forward on this site, adequate flood defence measures would need to be in place in accordance with Planning Policy Statement 25: Development and Flood Risk (PPS25).</p>

Issue Raised	Initial Officer Comments
The site would be better used for residential purposes.	Comment noted.
The site is detached from the main settlement of Rochford and from the associated services there.	Comment noted. The site is detached from the main settlement of Rochford (although the physical distance is not great), but this must be balanced with other considerations, such as the site being brownfield land outside of the Green Belt.
The site would be better allocated for employment uses, particularly light industrial use.	The Council consider – as set out in the Core Strategy – that there are preferable strategic locations for employment in the District, particularly around London Southend Airport. It is also important that plans are deliverable, and it is unlikely that it would viable to develop the site for employment.
An historic building survey would be required, alongside an archaeological survey.	Comment noted.
Star Lane Industrial Estate	
The relocation of the existing workforce must be a primary consideration.	Comment noted. As set out in Rochford District Council's Economic Development Strategy 2009-2013, objectives of the Council's Economic Development Unit include to ensure that the relocation of industrial estates is economically viable and deliverable, to ensure that any intentions in this respect are effectively communicated to the business community so that they can plan for change and also to ensure that those businesses are adequately supported.
PPS4 states that sustainably located employment sites should be retained, and the site should be retained for employment use.	The Rochford District Employment Land Study included an assessment of the existing employment sites in the District. In the case of Star Lane, it concluded that, given the quality of existing stock is very poor and its strategic location is also poor, Rochford District Council should consider reallocating this site for other uses.

Issue Raised	Initial Officer Comments
The site is in multiple ownership, making delivery of this option significantly more difficult.	Part of the site is in multiple ownership, whereas a significant area is under single ownership where the owners are actively promoting the site for residential development. With regards to the portion of the site in multiple ownership, alternative employment land will be allocated and the Council will work with landowners, developers, business representatives and other stakeholders to ensure this is delivered and that displaced businesses are suitable relocated.
The potential contamination of this site is a potential issue.	Comment noted. This would need to be taken into consideration during the development management process.
Relocation of this site, together with the additional housing proposed for Great Wakering, would increase the proportion of residents out commuting.	The Core Strategy proposes alternative employment land be provided in Great Wakering, as well as in other parts of the District.
Anglian Water Ltd state that infrastructure and/or treatment upgrades are required to serve proposed growth.	Comment noted. The Council will work with infrastructure providers and developers to ensure that there is appropriate infrastructure in place in a timely manner to serve any proposed development.
Star Lane Brickworks	
Development of brownfield sites is preferable to the development of Green Belt sites.	Comment noted.
Contamination of the site.	Comment noted. This would need to be taken into consideration during the planning application process.
This option supported, particularly as it was seen to be in accordance with PPS3 prioritising the use of previously developed land.	Comment noted.
The relocation of employment sites would result in additional Green Belt land being lost for employment land which was not supported.	The reallocation of existing employment land and the need to provide additional employment land is evidenced within the Employment Land Study.

Issue Raised	Initial Officer Comments
Anglian Water Ltd. state that infrastructure and/or treatment upgrades are required to serve proposed growth.	Comment noted. The Council will work with infrastructure providers and developers to ensure that there is appropriate infrastructure in place in a timely manner to serve any proposed development.
Eldon Way and Foundry Industrial Estates	
Preferable to develop existing industrial estates for housing than release Green Belt.	Comment noted. Such issues will need to be considered when producing the Hockley Area Action Plan.
Hockley is considered to be overdeveloped and thus this option is not supported as the area cannot support additional housing.	Comment noted. Such issues will be considered when producing the Hockley Area Action Plan, particularly the need for any development to be accompanied by the required infrastructure.
The site is in multiple ownership currently and thus delivery would be more difficult.	Comments noted. If the site were to be developed, the Council acknowledge that the site will not come forward in the early part of the plan period. Alternative employment land will be allocated and the Council will work with landowners, developers, business representatives and other stakeholders to ensure this is delivered and that displaced businesses are suitable relocated.
Infrastructure, improved or not, would not be able to cope with any additional development.	The Council have worked with infrastructure and service providers in developing the Core Strategy which set the principle of producing an Area Action Plan for Hockley centre. The Council will continue to work with infrastructure and service providers to ensure that proposals in the Hockley Area Action Plan address infrastructure needs.
The potential for this site to have contamination issues.	Comment noted. This will be considered as part of the Hockley Area Action Plan and, where necessary, the development management process of individual schemes.
The site has good access to the transport network and Hockley centre.	Comment noted.

Issue Raised	Initial Officer Comments
Gypsy and Traveller Sites	
It is wrong to identify the needs of a single minority community without identifying the needs of other communities.	The Council's planning policies seek to address the planning requirements of all members of the community, including Gypsies and Travellers.
Where can the evidence base documents be found (in hard copy and online)?	The evidence base documents (the Essex Wide Gypsy and Traveller Accommodation Needs Assessment 2006 and the Essex Gypsy and Traveller Accommodation Assessment 2009) can be found within the Council's Evidence Base library both online ¹ and at the Rochford District Council offices in Rochford upon request.
The needs, costs and issues involved with the site should be noted within the document.	The Allocations Development Plan Document will allocate land for the site, but it will be implemented privately. The site would not be run by the Council, therefore there will be no public cost in this respect.
Information should be provided in the document as to the definition of a 'pitch' and the size of the site options shown.	Comment noted. As noted in the Essex Gypsy and Traveller Accommodation Needs Assessment (2009) a "pitches often contain more than one caravan, typically two or three" (paragraph 4.3) ² .
GT1	
This site would not be large enough to accommodate all the required pitches.	Comment noted. Options include accommodating the required number of pitches on one large site or on several smaller sites.

¹ Rochford District Council's Evidence Base Library
www.rochford.gov.uk/planning_and_building_control/policy/local_development_framework/evidence_base.aspx

² Essex Gypsy and Traveller Accommodation Assessment 2009 www.rochford.gov.uk/PDF/planning_gypsy_accomodation_assessment.pdf

Issue Raised	Initial Officer Comments
<p>The option was supported as the site was removed from the main settlement and was also currently being used as a Gypsy and Traveller Site.</p>	<p>Comment noted. However, in the allocation of sites, consideration includes access to GP and other health services, and children attending school on a regular basis. Sites which meet such criteria will often be in proximity to existing residential areas, rather than away from the main settlement.</p> <p>Notwithstanding the fact the site is currently being used as a Gypsy and Traveller site, it is relevant to note that planning permission for 12 residential Travellers Caravans and retention of existing access at the site was refused in 2010 (Ref: 10/00582/COU). The application was subsequently appealed, but the appeal dismissed. Whilst planning applications and the allocation of land are separate matters, the appeal decision shows that this site is not an appropriate one.</p>
<p>A better option would be to allocate several smaller or individual sites rather than one larger one.</p>	<p>Comment noted.</p>
<p>The highways access to the site is a problem.</p>	<p>Comment noted. A planning application for the provision of 12 residential Travellers Caravans and retention of existing access at the site was made in 2010 (Ref: 10/00582/COU). The applications was refused and subsequently appealed.</p> <p>In considering the appeal, the Planning Inspector concluded that the proposal would prejudice highway safety along the A1245</p> <p>It is important to note that a planning application and the allocation of land are separate matters. However, the Inspector's conclusions are still relevant in the consideration of whether the allocation of land would be appropriate.</p>
<p>The Environment Agency noted that the site is close to land that is in Flood Zone 2 which must be considered.</p>	<p>Comment noted.</p>

Issue Raised	Initial Officer Comments
The site will get larger in size over time.	Government guidance (contained in Planning Policy Guidance Note 2 – Green Belts) states that it is important that Green Belt boundaries be well-defined, using readily recognisable features where possible to prevent encroachment. This option is bounded to the west by the A1245. Landscape treatment would be required on the other boundaries of an allocation here to ensure any revision to the Green Belt is clearly defined.
Anglian Water Ltd commented that there are major constraints to the provision of infrastructure and/or treatment to serve proposed growth will be required.	Comment noted. The Council will work with infrastructure providers and developers to ensure that there is appropriate infrastructure in place in a timely manner to serve any proposed development.
GT2	
This option is supported as it is located in one place and is partly used as an existing Gypsy and Traveller site.	Comment noted. However, notwithstanding the fact that part of the site is currently being used as a Gypsy and Traveller site, it is relevant to note that planning permission for 12 residential Travellers Caravans and retention of existing access at part of the site was refused in 2010 (Ref: 10/00582/COU). The application was subsequently appealed, but the appeal dismissed. Whilst planning applications and the allocation of land are separate matters, the appeal decision shows that this site is not necessarily an appropriate one.
The site is too close to the main settlement of Rayleigh.	In the allocation of sites, consideration includes access to GP and other health services, and children attending school on a regular basis. Sites which meet such criteria will often be in proximity to existing residential areas.
Access to services, schools and doctors and the highway network from this location.	This option is somewhat isolated from the main settlement and services there, although the site is well located in relation to the A1245 and transport network.

Issue Raised	Initial Officer Comments
Local infrastructure could not support this development.	The scale of any development is such that impact on local infrastructure is likely to be nominal. However, the Council will continue to seek the views of infrastructure providers on any proposals.
As per GT1 concerns regarding highways access to the site.	Comment noted. A planning application for the provision of 12 residential Travellers Caravans and retention of existing access at the site was made in 2010 (Ref: 10/00582/COU). The applications was refused and subsequently appealed.
Conflicting comments as to whether the pitches would be better located on one site or on several sites across the District.	<p>In considering the appeal, the Planning Inspector concluded that the proposal would prejudice highway safety along the A1245.</p> <p>It is important to note that a planning application and the allocation of land are separate matters. However, the Inspector's conclusions are still relevant in the consideration of whether the allocation of land would be appropriate.</p>
The Environment Agency state their concerns over the site being located in Flood Zone 2 and 3, thus not being in line with PPS25 or the emerging Policy H7 of the Core Strategy.	Comment noted. It has been identified that there is a small area of Flood Zone 2 and 3 towards the southern extent of this option. This is a factor which will need to be considered in the development of preferred option for the provision of gypsy and traveller accommodation.
GT3	
The land is currently used for crop growing and was therefore unsuitable.	However, it must be borne in mind that sites should be allocated which are deliverable – as land at this option is currently in alternative use, and does not have a history of being promoted for use as a Gypsy and Traveller site, the deliverability of this option is questionable.
The site is located too close to residential dwellings.	In the allocation of sites, consideration includes access to GP and other health services, and children attending school on a regular basis. Sites which meet such criteria will often be in proximity to existing residential areas.

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Issue Raised	Initial Officer Comments
Option supported as it was not too close to residential dwellings.	Comments noted. It is, however, important to remember that sites should be located with good access to services, in particular schools and healthcare.
This would be the first development people saw when driving into the District and it was felt this may be inappropriate.	<p>The landscape character of the area is defined as South Essex Coastal Towns, and is likely to be impacted if this site is allocated as the site is currently open fields and is designated Green Belt.</p> <p>However there are several businesses and buildings within close proximity, including to the west of this option. Nevertheless, the site fronts a prominent road at a gateway into Rayleigh and design and impact on the character of the area must be a consideration.</p>
Highways access to the site and the impact additional traffic movements would have on an already congested network.	<p>Access to any site would be developed in consultation with Essex County Council Highways to ensure it was appropriate.</p> <p>Impact on highway congestion would be nominal given the scale of development in question.</p>
Several smaller sites would be more appropriate.	Comment noted.
Proximity of this site to a school.	Good access to schools is a positive, as when allocating sites consideration includes children attending school on a regular basis.
The release of Green Belt inappropriate.	Comment noted. However, there is an identified need for Gypsy and Traveller sites in the District, and a lack of alternatives that are not within the Green Belt.
GT4	
The area surrounding this site is mainly unmade roads and as such is unsuitable.	Comments noted. Access to the highway network is an important consideration.

Issue Raised	Initial Officer Comments
The proximity of this site to residential dwellings.	In the allocation of sites, consideration includes access to GP and other health services, and children attending school on a regular basis. Sites which meet such criteria will often be in proximity to existing residential areas.
Transport issues, including an increase in traffic movements.	Given the scale of development proposed, impact on highway congestion would be nominal.
Access to services from this site, including schools, doctors, amenities etc.	This option is situated outside the settlement boundary of Hockley although there are local services further to the south of the site.
Is the site is connected to water, electricity and sewage services?	The land has been used as a Gypsy and Traveller site in the past, suggesting that it can be used as such, although current deliverability will include other factors, such as whether those with control over the land would be interested in seeing the development realised.
Loss of Green Belt land for the provision of this site.	Comment noted. However, there is an identified need for Gypsy and Traveller sites in the District, and a lack of alternatives that are not within the Green Belt.
The site would be better used for residential purposes rather than a Gypsy and Traveller site.	Comment noted. The Core Strategy does not propose residential development in this general location.
Gypsy and Traveller sites would be better located to the west of the District.	Comment noted. The Core Strategy states that sites will be allocated in the west of the District, where transport links and access to services are better.
This site, in conjunction with GT3 and GT5 were sufficient to provide the required number of pitches.	Comment noted.

Issue Raised	Initial Officer Comments
GT5	
The site was located too close to residential areas and historic woodland.	<p>In the allocation of sites, consideration includes access to GP and other health services, and children attending school on a regular basis. Sites which meet such criteria will often be in proximity to existing residential areas.</p> <p>Impacts on the adjacent wooded area would have to be carefully considered if this option were to be taken forward. The site is not in proximity to Ancient Woodland.</p>
Transport issues, including an increase in traffic movements.	Given the potential scale of any development at this site, impact on highway congestion would be nominal.
Access to services from this site, including schools, doctors, amenities etc.	This option is somewhat isolated from the nearest main settlements of Rochford and Ashingdon, and the services there.
Is the site connected to water, electricity and sewage services?	The land has been used as a Gypsy and Traveller site, suggesting that deliverability is not problematic.
There were conflicting comments as to whether the pitches would be better located on one site or on several sites across the District.	Noted.
GT6	
Too isolated and removed from services.	This option is somewhat isolated from the main settlement and services there, although the site is well located in relation to the A1245 and A127.
The site was considered to be too large by some respondents.	The District's requirement could be accommodated by using only part of this site.

Issue Raised	Initial Officer Comments
The site was deemed to be an ideal location in terms of access to the highway network by a number of respondents.	This site has excellent links to the A1245 and A127 in particular.
The site would be difficult to control and police due to its size and location.	It may be the case that only part of the site be allocated, if this option were to be allocated.
Site is too close to the settlement of Rayleigh.	This option is somewhat isolated from Rayleigh. In any case, in allocating sites, consideration includes access to GP and other health services, and children attending school on a regular basis. Sites which meet such criteria will often be in proximity to existing residential areas.
GT7	
Site was too small.	This site could not accommodate the District's total requirement alone.
Site is too close to the residential settlement.	In allocating sites, consideration includes access to GP and other health services, and children attending school on a regular basis. Sites which meet such criteria will often be in proximity to existing residential areas.
Access to the site and the impact increased traffic movements from the site would have on the road network.	Access to any site would be developed in consultation with Essex County Council Highways to ensure it was appropriate. Impact on highway congestion would be nominal given the scale of development in question.
The site is on a narrow unmade road, and has no access to services including water, sewage, electricity bringing into question its deliverability.	Comments noted. Access to the highway network is an important consideration. In terms of other forms of infrastructure, representations have been submitted from those stating that they would be interested in delivery the site, although as a accommodation for Travelling Show People – a separate and distinct use from Gypsy and Traveller accommodation. As such, its deliverability as a site for Gypsy and Traveller accommodation is unclear.

Issue Raised	Initial Officer Comments
GT – Are these the best locations to consider?	
Gypsy and Traveller pitches should not be located in Hockley.	Comments noted. The Core Strategy proposes that pitches be directed to the west of the District where transport links and access to services are better.
Support for different options.	Comments noted.
All of the options too close to existing residential settlement.	In the allocation of sites, consideration includes access to GP and other health services, and children attending school on a regular basis. As such, potential sites will often be located near existing residential areas.
GT – Should any other locations be considered?	
A number of sites were suggested for consideration, including industrial areas and sites close to main routes, and London Southend Airport.	Comment noted. These will be considered within the next stage of the Allocations DPD, but it must be noted that the Allocations DPD is required to conform to the Core Strategy, and the Core Strategy sets criteria for the allocations of Gypsy and Traveller sites.
Economic Development	
How can the Council plan to provide 3000 jobs, and how can it be ensured that the jobs are for local people.	The Council, as the Local Planning Authority, can enable the provision of 3,000 additional jobs through the allocation of the requisite land for employment uses, through planning policies which direct employment generating uses to the most appropriate locations, and which encourage
How can the Council allocate land for jobs that cannot currently exist.	It is important to note that the allocation of land for job number is based on projections up to 2021.

Issue Raised	Initial Officer Comments
Baltic Wharf	
The allocation is considered to be inflexible.	The site is subject to, and surrounded by, a number of environmental constraints which must be considered.
The Environment Agency note that the site is within Flood Zone 2/3 and as such vulnerable uses should not be permitted.	Comment noted. Only uses within the 'less vulnerable' or 'water-compatible development' as defined within Planning Policy Statement 25: Development and Flood Risk (PPS25) will be permitted. Furthermore docks, marinas and wharves are themselves classified within the 'water-compatible development' category (Table D2, Page 26) ³ .
Purdeys Industrial Estate	
The site may be contaminated which would need to be considered.	Possible contamination would need to be considered if redevelopment were proposed, depending on the nature of any redevelopment.
The site may be suitable for expansion.	The expansion of this existing employment site has not been identified within the Core Strategy DPD.
Riverside Industrial Estate	
It was noted by the Environment Agency that the site is located in Flood Zone 3.	Comment noted. Only uses within the 'less vulnerable' or 'water-compatible development' as defined within Planning Policy Statement 25: Development and Flood Risk (PPS25) will be permitted. Furthermore docks, marinas and wharves are themselves classified within the 'water-compatible development' category (Table D2, Page 26) ⁴ .

³ Planning Policy Statement 25: Development and Flood Risk www.communities.gov.uk/documents/planningandbuilding/pdf/planningpolicystatement25.pdf

⁴ Planning Policy Statement 25: Development and Flood Risk www.communities.gov.uk/documents/planningandbuilding/pdf/planningpolicystatement25.pdf

Issue Raised	Initial Officer Comments
Brook Road Industrial Estate	
This would make an ideal residential area.	Existing employment land has been assessed within the Employment Land Study and the SHLAA to identify those sites most suitable to be reallocated for residential development.
Brook Road Industrial Estate is ideally located in terms of highway access and as such should be promoted.	Comment noted. This existing employment site is considered to be 'fit for purpose' and has been identified within the Core Strategy DPD to be retained for employment uses.
The Environment Agency noted that a small area of the site is in Flood Zone 2.	Comment noted. Only uses within the 'less vulnerable' or 'water-compatible development' as defined within Planning Policy Statement 25: Development and Flood Risk (PPS25) will be permitted. Furthermore docks, marinas and wharves are themselves classified within the 'water-compatible development' category (Table D2, Page 26) ⁵ .
Star Lane Industrial Estate	
This should not be reallocated due its ideal location, and should instead be allocated for a mixed use development to ensure no loss of employment opportunities.	Comment noted.
Eldon Way Industrial Estate	
Support for the reallocation of this industrial estate provided if it was for a mixed use scheme and employment opportunities were not lost.	Any development of Eldon Way Industrial Estate and the Foundry Business Park will be determined through the Hockley Area Action Plan.
The allocation not supported for the following reasons:	Any development of Eldon Way Industrial Estate and the Foundry Business Park will be determined through the Hockley Area Action Plan.

⁵ Planning Policy Statement 25: Development and Flood Risk www.communities.gov.uk/documents/planningandbuilding/pdf/planningpolicystatement25.pdf

Issue Raised	Initial Officer Comments
<ul style="list-style-type: none"> • The relocation of Industrial Units to the proposed Airport Business Park to provide space for redevelopment and additional housing in the Town Centre is not supported for the following reasons: <ul style="list-style-type: none"> – There should be no large housing estates due to lack of infrastructure – There is no proposed solution to traffic issues on the already congested main artery road between Rayleigh and Hockley, i.e. the B1013. – There is no public transport (trains or buses) to support the Airport Business Park – Based on the results of a resident survey in October 2009, seven out of every eight residents in Hockley opposes major redevelopment of Eldon Way/Foundry Industrial Estates – Based on the results of a resident survey in October 2009, if redevelopment of Eldon Way / Foundry Industrial Estates is enforced, the recommendations for change include a youth centre, a healthcare centre, a community centre and leisure facilities, with only 1% support for housing. – It contradicts RDC's own Retail & Leisure Study 2008 proposal to reclassify Hockley as a District centre - Hockley should be kept as a Village 	
<p>Sufficient space in Hockley and no more is required in Eldon Way.</p>	<p>Comment noted. It is important that planning provides for future growth and development, and enables potential opportunities to be realised.</p>

Issue Raised	Initial Officer Comments
Stambridge Mills	
Support for the reallocation of this site to residential.	Comment noted.
Location in Flood Zone 3, and relative distance from the settlement of Rochford.	Stambridge Mills is situated within an area at risk of flooding (flood Zone 2 and 3). Prior to any development coming forward on this site, adequate flood defence measures would need to be in place in accordance with Planning Policy Statement 25: Development and Flood Risk (PPS25).
The site would be better developed for light industrial use, and as a residential development there would be no defensible Green Belt boundary.	Stambridge Mills is already outside of the Green Belt. Its allocation for residential use would require an amendment to the Green Belt boundary.
Rawreth Industrial Estate	
<p>The existing site is occupied by a multitude of established industrial businesses. It is an important local industrial area which provides premises for small businesses, which would be difficult to relocate. The land is likely to be heavily contaminated and would require extensive remediation to support new housing development subject to viability. The site is poorly located in relation to the railway station, Town Centre and the existing bus network. Furthermore, the existing highway already suffers from congestion, and very heavy traffic movement. Residential development is considered to be an unsuitable re-use of the site.</p>	<p>Rawreth Industrial Estate was assessed as part of the Rochford District Employment Land Study. The study (para 7.22 stated the following about the estate:</p> <p>“This is similar to Brook Road with poor quality stock but the adjoining green belt provides an opportunity to develop high quality office stock which is strategically located. We acknowledge that this site has particular environmental issues and has been identified, through the Urban Capacity Study, as a site that may be suitable for housing use. We recommend that the Council consider allowing a reallocation of this site to housing provided that the requisite employment land is provided elsewhere, preferably on a portion of the green belt land West of Rayleigh. This would be while ensuring that the majority of the green belt land is maintained.”</p> <p>The study found that, whilst many of the buildings were good quality, internal access was poor.</p>

Issue Raised	Initial Officer Comments
	<p>It is acknowledged that the site is currently home to a number of businesses. However, the layout of the industrial estate, and its proximity to existing residential areas, bring into question the long-term viability of the site for use as employment. The Council's view is that a new, purpose built employment area in a more suitable location would be beneficial to local businesses and economic development generally, in the long-term.</p> <p>As a brownfield site adjacent to existing residential areas, it is considered an appropriate location for housing. The Core Strategy recognises that infrastructure improvements will be required if the site is redeveloped, and includes the requirement for these to accompany any residential development.</p>
Infrastructure and/or treatment upgrades are required to serve proposed growth in terms of water services.	The Council will work with infrastructure providers and developers to ensure that there is appropriate infrastructure in place to serve the proposed growth.
Additional Employment Sites to be Allocated	
The general location of West Rayleigh is unsuitable due to the location of residential settlements and schools in the area.	The general location of West Rayleigh for additional employment was determined through the Core Strategy, and is in accordance with the recommendations of the Employment Land Study.
Release of Green Belt land.	As identified in the Core Strategy, the District requires additional employment land in the long-term, and there is a lack of available sites outside of the Green Belt.
Redevelop the recently vacated Eon Site in West Rayleigh.	Yes, the site represents a new opportunity. However, it should be borne in mind that the Employment Land Study still recommended additional land would be required for employment in the long-term when this site was still in use.

Issue Raised	Initial Officer Comments
Increased traffic movements from an industrial site, and the impact an additional site would have on the environment.	<p>The Council will work with Essex County Council to ensure that the allocation of sites is acceptable in terms of its impact on highways.</p> <p>In respect of impact on the environment, the Council are seeking to ensure a balance between environmental, social and economic issues. The Council feel that this is best served in this instance through only allocating additional land for employment where a need has been demonstrated through the Employment Land Study.</p>
Why are employment sites being directed to West Rayleigh when other sites were felt to be more suitable (London Southend Airport)?	The area to the north of London Southend Airport will be considered within the London Southend Airport and Environs Joint Area Action Plan.
Why are additional sites required when other sites in the District are empty or not being used to capacity?	The Employment Land Study has identified that, in the long-term over the plan period, additional land for employment will be required. It is important that the Local Planning Authority does not stifle economic development and growth.
Essex County Council had no objection to the general location, although noted that archaeological surveys would be required.	Comment noted.
E13	
This site is located too close to residential settlements and schools.	Comment noted.
This site would add congestion to an already congested traffic system.	The Council will work with Essex County Council to ensure that the allocation of sites is acceptable in terms of its impact on highways.
Impact on the environment and the loss of Green Belt.	Comment noted. The Council are seeking to ensure a balance between environmental, social and economic issues. The Council feel that this is best served in this instance through only allocating additional land for employment where a need has been demonstrated through the Employment Land Study.

Issue Raised	Initial Officer Comments
Support for this site if infrastructure is upgraded accordingly.	Comment noted.
E13, E14, E15, E16 and E17	
Loss of existing industry in the area.	Comment noted. Any allocation could incorporate existing businesses, or if this were not possible, the Council would need to assist in the relocation of the existing businesses.
Transport issues, mainly congestion, and loss of Green Belt.	These sites relate well to highway infrastructure. The Council will work with Essex County Council to ensure that the allocation of sites is acceptable in terms of its impact on highways.
The site is not large enough (E13) for an industrial site and there are other more suitable locations.	The site is 2.65 ha. The Employment Land Study recommends that land is allocated to match any deallocations of land in the District, plus 2.2 ha. As such, this site has the potential to accommodate projected need, plus some of the land deallocated.
There is sufficient capacity in water services to accommodate the site.	Comment noted. The Council will work with infrastructure providers and developers to ensure that there is appropriate infrastructure in place to serve the proposed growth.
New employment land be developed in conjunction with residential development in the North of London Road location.	This possibility must be considered alongside the requirement, as set out in the Core Strategy, for public open space to be provided as a buffer between residential development to the North of London Road and the A1245. In addition, the proposed employment land will be required to accommodate any businesses displaced by the deallocation of Rawreth Industrial Estate. Such businesses include those that it would not be appropriate to include within a mixed use development.

Issue Raised	Initial Officer Comments
E18	
This location was generally supported however the question of access to public transport from the site was raised.	Comment noted. The provision of public transport provision is likely to be less viable to this site, due to its relative isolation when compared with other options.
North of London Southend Airport	
This option was generally supported although it should be noted that the Environment Agency recognise some of the land is Flood Zone 2 and 3.	Comment noted.
Archaeological examination would be needed.	Comment noted.
What is the economic potential of London Southend Airport, and where details regarding this can be found?	As part of work on the London Southend Airport and Environs Joint Area Action Plan, Southend Borough and Rochford District Councils published an evidence base document which included an examination of the economic potential of the airport. This is available via the Council's website: www.rochford.gov.uk (direct link: www.rochford.gov.uk/PDF/JAAP_evidence_base.pdf)
E19	
Loss of Green Belt land, and proximity to a Local Wildlife Site.	Comment noted. Potential impact on the Local Wildlife Site would have to be carefully considered, although proximity to the Local Wildlife Site does not by itself render this option fundamentally inappropriate.
Water services upgrades would be needed to accommodate this option.	Comment noted. The Council will work with infrastructure providers and developers to ensure that there is appropriate infrastructure in place to serve the proposed growth.

Issue Raised	Initial Officer Comments
E20	
Loss of Green Belt land, and proximity to a Local Wildlife Site.	Comment noted. Potential impact on the Local Wildlife Site would have to be carefully considered, although proximity to the Local Wildlife Site does not by itself render this option fundamentally inappropriate.
Water services upgrades would be needed to accommodate this option.	Comment noted. The Council will work with infrastructure providers and developers to ensure that there is appropriate infrastructure in place to serve the proposed growth.
Very close to the District Boundary.	Comment noted. It is important that the allocation of land does not engender the coalescence of Great Wakering and Southend/Shoeburyness.
E21	
Loss of Green Belt land, and proximity to a Local Wildlife Site.	Comment noted.
Water services upgrades would be needed to accommodate this option.	Comment noted. The Council will work with infrastructure providers and developers to ensure that there is appropriate infrastructure in place to serve the proposed growth.
E22	
Loss of Green Belt land, and proximity to a Local Wildlife Site.	Comment noted.
Water services upgrades would be needed to accommodate this option.	Comment noted. The Council will work with infrastructure providers and developers to ensure that there is appropriate infrastructure in place to serve the proposed growth.
This option would have less impact than others put forward.	Comment noted.

Issue Raised	Initial Officer Comments
E23	
This option was supported although the question of its location in terms of access to public transport was questioned.	This site would be functionally separate from Great Wakering and likely to be more closely related to Shoebury in Southend Borough, and access to public transport there.
Loss of Green Belt land, and proximity to a Local Wildlife Site.	Comment noted.
Water services upgrades would be needed to accommodate this option.	Comment noted. The Council will work with infrastructure providers and developers to ensure that there is appropriate infrastructure in place to serve the proposed growth.
E24	
This option was supported although the question of its location in terms of access to public transport, and proximity to the District boundary was questioned.	Comment noted. This site would be functionally separate from Great Wakering and likely to be more closely related to Shoebury in Southend Borough.
Loss of Green Belt land, and proximity to a Local Wildlife Site.	Comment noted.
Water services upgrades would be needed to accommodate this option.	Comment noted. The Council will work with infrastructure providers and developers to ensure that there is appropriate infrastructure in place to serve the proposed growth.

Issue Raised	Initial Officer Comments
Environment	
The identification of Star Lane Pits as a Local Wildlife Site was supported, and other sites were also suggested.	Comment noted. A review of the Local Wildlife Sites was undertaken in 2007 ⁶ and those which have been considered to merit this designation have been included within the Allocations DPD Discussion and Consultation Document. The sites suggested may be considered when this designation is next reviewed.
Sites of Special Scientific Interest (SSSI)	
Why is the Council only looking at areas designated as SSSI? It should be noted within the document that Hullbridge shoreline is a site of archaeological importance.	The Council is not only looking at areas designated as SSSI. The shoreline around Hullbridge is currently part of the coastal protection belt, and it is proposed to remain as such.
Special Protection Areas	
This was supported although it was noted that shooting clubs practice in the area.	Comment noted.
Special Areas of Conservation	
Natural England noted that the penultimate sentence should refer to the Essex Estuaries as being an SAC rather than an SPA.	Comment noted.

⁶ Rochford District Local Wildlife Sites Review 2007 www.rochford.gov.uk/planning_and_building_control/policy/local_development_framework/evidence_base.aspx

Issue Raised	Initial Officer Comments
Flooding	
The Environment Agency stated that Flood Zone 3b needs to be mapped also.	The Allocations Development Plan Document does not propose to allocate areas at risk of flooding, as this information is provided to us by the Environment Agency on a quarterly basis, and therefore may need to be updated on a regular basis.
Upper Roach Valley	
This designation could be extended to protect a larger area.	Comment noted. Whilst the merits of a larger area are acknowledged, it is important that the extent of the area is justified.
Environmental Allocations	
Brownfield sites should be included within environmental allocations.	Brownfield land may be included within environmental allocations where it is merited. For example, the suggested coastal protection belt includes some brownfield land.
Coastal Protection Belt	
This option was supported.	Comment noted.
Education Allocations	
It was questioned why the requirements of additional schools were not noted within the document in order to set out the size of the site that would be required to support the school. It should also be mentioned whether the school would have facilities for a swimming pool and whether the school would have facilities that are open to the community outside of school hours.	Additional schools will be incorporated within the appropriate proposed residential allocations, as set out within these residential options. The precise nature of any school developed – such as the facilities it has – will be for the education authority to decide.
The site North of London Road was generally supported as was the site in West Rochford for future primary school provision.	Comment noted.

Issue Raised	Initial Officer Comments
KES1, KES2 and KES3	
<p>Opinion was split on these options with objections being that the Options 2 and 3 would be located away from the existing main school buildings and due to the distance would appear as a separate campus, and would result in additional noise and disturbance as the students travel between the buildings. The Options 2 and 3 would involve the development extending further east into the surrounding countryside that the residential areas to the north and south, resulting in urban sprawl, and would not create defensible boundaries, contrary to PPG2. In addition, the options would also conflict with the proposed housing option (SEA2) proposed for South East Ashingdon. However Option KES3 was seen as being only slightly more sustainable as the northern section would be located too far from the school.</p>	<p>It is important that this allocation be considered in conjunction with the allocation of land for residential use in the area.</p>
Greensward School	
<p>It was noted that Plumberow Primary School was not identified separately from Greensward School.</p>	<p>The allocation is for education use and does not differentiate between secondary and primary.</p>
General Comments	
<p>There was some concern that new schools would be built when other schools are not at capacity thereby threatening existing schools with closure.</p>	<p>The Council has worked closely with Essex County Council Schools Children and Families service to ensure that schools have the capacity to support increased population, and if not where was the most appropriate site to locate any new educational facilities.</p>
<p>There was also some concern regarding additional traffic movements associated with schools.</p>	<p>The Council recognise the potential for additional schools to generate additional traffic. As such, all new schools will be required, as set out in the Core Strategy, to devise and implement a green travel plan, which aims to reduce private, single-occupancy car use. In addition, the Council will work with Essex County Council Highways to ensure that the impact of any new development on highways is managed and mitigated.</p>

Issue Raised	Initial Officer Comments
<p>Open Space</p> <p>Policies were generally supported although several other locations were suggested, and respondents would generally like more areas allocated for public open space. Additional areas suggested include: Stambridge Memorial Hall grounds; Betts Wood; Folly Lane; Gusted Hall area; Belchamps; Battlesbridge Village Green; and Hullbridge Car Park. In addition it was suggested that land South of Nelson Gardens, Hockley Woods and Turret House Open Space should all link up and provide a buffer stretching from rear of Wellington Road where it adjoins B1013 right over to Albert Road and all the way up to and beyond Hockley Woods.</p>	
	<p>Stambridge Memorial Hall grounds: this area is recognised is being used for outdoor sport in the 2009 Open Space Study, and merits consideration for allocation as open space in order to safeguard its use. The Open Space Study 2009 suggests that the majority of the District has a deficit in open space provision, although when considered by ward there is an identified surplus for Rochford ward.</p> <p>Betts Wood: this site was identified as a natural/semi-natural green space in the 2009 Open Space Study. It was assessed along with other natural / semi-natural green spaces in the District in terms of the condition and maintenance of the main entrance, site boundary, roads/paths and access, planted areas, grass areas, facilities such as bins, seating, toilets, parking, lighting and information provided about the greenspace, and the cleanliness of the site. Betts Wood was found to be poor/very poor when assessed against the aforementioned criteria. However, this does not preclude the site from being allocated as an open space and safeguarded for this use – simply because it is currently of poor quality (or was when the 2009 assessment was undertaken) does not mean that such space is surplus to requirements.</p> <p>Folly Lane: the green space around Folly Lane and Folly Chase, is not thought to be laid as a public garden or for public recreational use (although public footpaths do run through the area). As such, it does not meet the definition of open space as set out in Planning Policy Guidance 17 (PPG17 – Planning for Open Space, Sport and Recreation).</p>

Issue Raised	Initial Officer Comments
	<p>Gusted Hall area: Gusted Hall wood is proposed to be allocated as a Local Wildlife Site. In the 2006 Rochford District Replacement Local Plan, the land around Gusted Hall Lane is designated as a Special Landscape Area (designated for their high quality landscape where there is a presumption against inappropriate development therein), and is proposed to be allocated as part of the Upper Roach Valley.</p> <p>Belchamps: the green space at Belchamps, Holly Oak Lane, is managed by Belchamps Scout Centre. As such, public use is restricted. However, the site is used for recreational activities, and has value as such. Allocating the site as open space would help to safeguard its recreational use from other forms of development (although it is already within the Green Belt), and it should be noted that the 2009 Open Space Study suggests that the majority of the District had a deficit in supply of outdoor sports facilities, including Hockley.</p> <p>Land South of Nelson Gardens, Hockley Woods and Turret House Open Space linked up to provide a buffer stretching from rear of Wellington Road: Land South of Nelson Gardens (Fairview Playing Field), Hockley Woods and Turret House Open Space have been identified for allocation as public open space in the Discussion and Consultation Document, and directly to the east of Wellington Road is the Upper Roach Valley Special Landscape Area.</p> <p>The areas referred to are in Trinity ward. The Open Space Study identifies that there is a small deficit in natural/semi natural greenspaces, youth facilities and outdoor sports facilities in general within this area, whereas there is a surplus of amenity greenspace and play space. There is potential for open space such as allotments to be designated in this area given the overall deficit within the Rayleigh/Rawreth area, however, a buffer is unnecessary given the proximity of the existing open space to the Upper Roach Valley Special Landscape Area.</p>

Issue Raised	Initial Officer Comments
Allotments be allocated and included within this policy.	The number of allotments in the District has been assessed within the Open Space Study 2009. The Council will require new residential development to be accompanied by open space, and use of part of that allocation could be for allotments. The exact provision of open space will be determined at the planning application stage.
A definition of open space be provided within this section in order to enable respondents to differentiate between open space and Green Belt.	Comment noted. Open Space has been defined within the Open Space Study 2009. Green Belt is a land allocation rather than a description of the use of land.
Glencroft Nurseries open space is in Hawkwell, not Hockley as stated.	Comment noted
Open space be protected through a combination of both the development management process on a case by case basis, and through the allocation of sites.	Comments noted. Such an approach would have the advantage of giving a clear indication of the open space in the District, whilst being flexible enough to ensure that if new open spaces were created they would also be protected.
Leisure Facilities	
Options were generally supported and additional locations suggested.	Comment noted. These will be considered within the next stage of the Allocations DPD.
It was questioned how the Council can allocate sufficient land for leisure facilities without specifying the enhancements that will be required through the Core Strategy Submission DPD.	<p>The Core Strategy states that the Council will work with its partners to ensure that leisure facilities across the District are maintained and enhanced. It also states that, in particular, the Council will seek to enhance recreational opportunities at Rayleigh Leisure Centre. This does not require additional land to be allocated.</p> <p>The Core Strategy also states that the Council will also look to make the best use of existing facilities in the District by encouraging those such as within school premises to be made accessible to all. Again, this does not require additional land to be allocated for this use.</p>

Issue Raised	Initial Officer Comments
	<p>Whilst additional land does not necessarily need to be allocated for additional use, allocating existing land used for leisure as such helps to safeguard their present use.</p>
Community Facilities	
<p>The options were generally supported and additional locations were suggested for allocation.</p>	<p>These will be considered within the next stage of the Allocations DPD.</p> <p>A range of different community facilities were flagged up as part of this consultation. These ranged in type and scale. However, it may be the case that there are further buildings / land in use as important community facilities that were not put forward as part of the consultation. As such, there is merit in a policy that seeks to protect the provision of existing community facilities generally: this would mitigate the risk of overlooking some existing facilities, and would be more appropriate in the case of very small scale facilities which may not merit particular land-use allocation, but may nevertheless be significant, important facilities.</p>
<p>Rayleigh Towns Sports and Social Club be added to the list of community facilities that will be safeguarded from development.</p>	<p>The site is currently within the Green Belt, but within a location which is being considered for allocation for residential development (North of London Road).</p> <p>The Open Space Study notes that there is a deficit of outdoor sports facilities within Rayleigh/Rawreth.</p> <p>A comprehensive redevelopment scheme could provide the club with brand new facilities. Certainty there is no intention whatsoever for the recreational facility or open space to be lost whether new facilities are provided as part of a comprehensive redevelopment or that the existing facilities are simply retained. It would be appropriate for the open space in its current configuration or otherwise to be allocated to ensure that it is safeguarded.</p>

Issue Raised	Initial Officer Comments
Hockley Fire Station should be added to the list of community facilities that will be safeguarded from development.	Hockley Fire Station is used for a variety of community uses. Specific allocations that address land in the centre of Hockley, including for community facilities, will be addressed through the Hockley Area Action Plan.
Massive Youth Project should be added to the list of community facilities that will be safeguarded from development.	Massive Youth Project currently operates out of Eldon Way industrial estate. Specific allocations that address land in the centre of Hockley, including for community facilities, will be addressed through the Hockley Area Action Plan.
Bullwood Hall should be added to the list of community facilities that will be safeguarded from development.	As a prison, it is not felt that this site would be appropriate to allocate as a community facility.
Ashingdon and East Hawkwell Village Hall should be added to the list of community facilities that will be safeguarded from development.	Ashingdon and East Hawkwell Memorial Hall is a community facility used for a variety of activities. Within the Replacement Local Plan (2006) the hall, including surrounding playing fields, is allocated as public open space.
Hockley Public Hall should be added to the list of community facilities that will be safeguarded from development.	Hockley Public Hall is situated towards the northern end of Bullwood Road, Hockley. As such, it is not within the area to be addressed by the Hockley Area Action Plan. Nevertheless, the site is within a residential area and is accessible in terms of its location. The building is used for a variety of activities by the local community, and merits consideration for allocation as community facility in order to safeguard the site for such a use, unless a blanket policy protecting community facilities is to be utilised instead.
Castle Road Hall should be added to the list of community facilities that will be safeguarded from development.	Castle Hall in Castle Road, Rayleigh is located in proximity to Rayleigh centre, within a residential area, in an accessible location to local residents. It is used for a variety of activities by the local community, and merits consideration for allocation as community facility in order to safeguard the site for such a use, unless a blanket policy protecting community facilities is to be utilised instead.

Issue Raised	Initial Officer Comments
Grange Community Centre should be added to the list of community facilities that will be safeguarded from development.	Comment noted – the Allocations Discussion and Consultation Document suggest this site be allocated. The Rayleigh Grange Community Centre is located in an existing residential area, opposite a school, in an accessible location. It is a well used local community facility. This site merits consideration for allocation as community facility in order to safeguard the site for such a use, unless a blanket policy protecting community facilities is to be utilised instead.
Hullbridge Day Centre should be added to the list of community facilities that will be safeguarded from development.	Hullbridge Senior Citizens Day Centre is located on Windermere Avenue, Hullbridge, just off Ferry Road and to the rear of the Riverside Medical Centre. It is located within an existing residential area and in a relatively accessible location. It merits consideration for safeguarding as a community facility, unless a blanket policy protecting community facilities is to be utilised instead.
Hullbridge Library should be added to the list of community facilities that will be safeguarded from development.	As a community facility located in an accessible location to the residents of Hullbridge, this site merits consideration for allocation as community facility in order to safeguard the site for such use. In a similar manner, Great Wakering library also merits consideration for allocation as a community facility. Hockley, Rochford and Rayleigh libraries are located within areas to be addressed by respective Area Action Plans.
Riverside Medical Centre should be added to the list of community facilities that will be safeguarded from development.	The site is in use for healthcare. Whilst an important facility for residents in its own right, healthcare facilities are not considered to merit their own allocation, as the provision through the planning system is determined through separate means; namely health impact assessments.
Hullbridge Garden Association should be added to the list of community facilities that will be safeguarded from development.	Hullbridge allotments merit consideration for allocation as open space. The shop on Ferry Road is a retail premise and does not warrant allocation as a community facility.

Issue Raised	Initial Officer Comments
Hullbridge Car Park should be added to the list of community facilities that will be safeguarded from development.	As a car park, the site is not considered to merit allocation as a community facility.
Hullbridge Scout Hut should be added to the list of community facilities that will be safeguarded from development.	Hullbridge Scout Hut is located to the rear of St Thomas of Canterbury Church, Thorpedene Avenue. Planning permission for a new scout hut to replace the existing premises was obtained in 2010. It is within a residential area and is accessible in terms of its location. The building is used for activities by the local community, and merits consideration for allocation as a community facility – potentially in combination with the neighbouring St Thomas of Canterbury Church Hall which is also used as a community facility – in order to safeguard the site for such use.
St Thomas' Church Hall, Hullbridge should be added to the list of community facilities that will be safeguarded from development.	This site has been utilised for a variety of community uses in recent years, and not simply as a place of worship. The site is adjacent to Hullbridge Scout Hut within a residential area and merits consideration for allocation as community facility – potentially in combination with the Scout Hut to the rear which is also used as a community facility – in order to safeguard the site for such use, unless a blanket policy protecting community facilities is to be utilised instead.
Hullbridge Free Church should be added to the list of community facilities that will be safeguarded from development.	As a community facility located in an accessible location to the residents of Hullbridge – and well located in relation to potential new residential development – this site merits consideration for allocation as community facility in order to safeguard the site for such use, unless a blanket policy protecting community facilities is to be utilised instead.
Hawkwell Village Hall should be added to the list of community facilities that will be safeguarded from development.	As a community facility located in an accessible location to the residents of Hawkwell and used for a variety of activities, this site merits consideration for allocation as community facility in order to safeguard the site for such use, unless a blanket policy protecting community facilities is to be utilised instead.

Issue Raised	Initial Officer Comments
Rawreth Village Hall should be added to the list of community facilities that will be safeguarded from development.	Rawreth Village Hall is located in the Green Belt. Its importance as a community facility which can be booked and used by the local community for a variety of activities is acknowledged. Although the site is in the Green Belt, its redevelopment was considered appropriate by the Local Planning Authority in 1991, as was an extension granted consent in 2004. As such, there is merit in allocating the land for use as a community facility, whilst maintaining the Green Belt designation to prevent harm to ensure any future development does not undermine the character or openness of the Green Belt, unless a blanket policy protecting community facilities is to be utilised instead
Cultural facilities be identified and allocated in addition.	Comment noted.
Town Centres	
Rayleigh	
The existing centre boundary should be maintained.	Comment noted.
Rochford	
The existing centre boundary should be maintained.	Comment noted.
Hockley	
The existing centre boundaries should be maintained.	Comment noted.
The exclusion of the shops to the west of Hockley (Option TC8) is not supported - regeneration (not expansion) of this row of shops/businesses must be encouraged without detriment to the village feel.	Comment noted.

Issue Raised	Initial Officer Comments
Eldon Way/Foundry Industrial Estates (Option TC8), whether remaining as industrial/leisure or redeveloped for other purposes, should not be included in the town centre boundaries.	Comment noted.
Support for amending the centre boundary to enclose only the primary shopping areas, as it was felt that this would then allow for some residential development outside of the centre.	Comment noted.
<p>Eldon Way and Foundry Industrial Estates should not be included within the town centre boundary for the following reasons:</p> <ul style="list-style-type: none"> • There should be no large housing estates due to lack of infrastructure • No proposed solution to traffic issues on congested B1013 • Lack of public transport supporting Airport Park • Resident survey October 2009 shows seven out of eight Hockley residents oppose major redevelopment of Eldon Way/Foundry Estates • Resident survey October 2009 - if redevelopment of Eldon Way/Foundry Estates enforced, recommendations include youth, healthcare, community centres and leisure facilities, with only 1% support for housing. • Contradicts RDC's Retail/Leisure Study 2008 proposal to reclassify Hockley as a District Centre. 	<p>The possible redevelopment of Eldon Way Industrial Estate and the Foundry Business Park will be determined through the Hockley Area Action Plan.</p> <p>In the meantime, the position of the town centre boundary will be used to direct development appropriate for town centres such as retail, office and leisure uses.</p> <p>Comments regarding the potential to reclassify Hockley centre are noted. The Retail and Leisure Study 2008 states:</p> <p>“We have recommended that Hockley be reclassified as a district centre in accordance with the criteria set out in PPS6. This is not to say that Hockley could not at some point in the future regain town centre status, although this would depend on an expansion of its retail offer.”</p> <p>The Retail and Leisure Study identified a number of opportunities for Hockley, intended to build around its existing strengths and remedy identified weaknesses. The study notes that these will require redevelopment and investment.</p>

Issue Raised	Initial Officer Comments
Reallocation of Hockley as a District Centre	
This option should be taken forward and Hockley centre be reallocated as a District Centre.	Support noted. Such views will have to be balanced against the potential adverse impact on Hockley centre.
Primary and Secondary Shopping Areas	
Rayleigh	
There should be a distinction between primary and secondary shopping frontage areas.	Planning Policy Statement 4: Planning for Sustainable Economic Growth states that primary shopping frontage areas “are likely to include a high proportion of retail uses” (Page 26). Secondary shopping frontage areas, however, “provide greater opportunities for a diversity of uses” (Page 26).
Rochford	
The distinction between primary and secondary frontages should be maintained. The mixed use development in Roche Close must be included in the primary shopping frontage because it contains the supermarket.	Consideration will be given to the inclusion of Roche Close within the primary shopping frontage area.
Hockley	
Option TC16 (existing primary and secondary shopping frontages) should remain the Primary Shopping Area and encourage minor regeneration and improvements of the secondary frontages. Option TC15 is too restrictive and does not fairly support those shops/businesses away from the centre.	The area allocated for the primary shopping area for Hockley must encourage retail uses in the centre, and be capable of accommodating demand for Hockley.
General Comments	
Clarification is needed as to the distinction between Primary and Secondary Shopping Areas.	The difference between primary and secondary shopping frontage areas was explained on Page 136 of the Allocations Discussion and Consultation Document.

Issue Raised	Initial Officer Comments
Other Issues and Next Steps	
Should any other land uses be allocated?	
Allotments should be allocated within the document.	The number of allotments in the District has been assessed within the Open Space Study 2009. The exact provision of open space will be determined at the planning application stage, but the Council supports the principle of identifying land for allotments in association with new housing development.
Health facilities should be allocated within the document.	<p>The Council's approach to planning for healthcare provision is set out in the Core Strategy and includes the following actions:</p> <ul style="list-style-type: none"> • Assist the Primary Care Trust in identifying sites for additional healthcare facilities in the District which are well related to the District's population and in accessible locations, and aid their implementation. • Require new residential developments over 50 dwellings and non-residential developments over 1000 square metres to be accompanied by a Health Impact Assessment and an assessment of their impact on healthcare facilities. Where significant impacts are identified, developers will be required to address negative effects prior to the implementation of development. • Take a positive approach towards proposals for the renovation or replacement of healthcare facilities that become outdated.

Issue Raised	Initial Officer Comments
	<p>South East Essex Primary Care Trust is not currently in a position to be able to commit to specific sites for healthcare facilities in the District. Furthermore, the government has proposed to abolish all Primary Care Trusts by 2013, although at the time of writing there is uncertainty as to whether the government intend to proceed with this. The Council propose to adopt a flexible approach to ensure that whatever healthcare structure is in place, the planning process can assist its needs, and that in addition healthcare facilities be provided when a need is identified through health impact assessments.</p>
<p>The following land uses should be allocated:</p> <ol style="list-style-type: none"> 1. Sacred (Crematoriums, Cemeteries, Churches). 2. Landmarks (Historical places that are closely associated with a town or village). 3. Mobile Home Parks. 	<p>The Rochford District Replacement Local Plan (2006) allocated land for an extension to Hall Road cemetery. However, there is currently no evidence that indicates additional land is required to be allocated for cemeteries.</p> <p>In terms of existing cemeteries, their use as such is safeguarded.</p> <p>The Council is looking to afford a greater degree of protection to landmarks that are of local importance through the introduction of the Local List Supplementary Planning Document.</p> <p>It is not necessary to allocate land for existing mobile home parks (in the same way that it is not proposed to allocate other forms of existing residential areas) and the Core Strategy – which the Allocations Development Plan Document is required to conform to – does not propose any additional mobile home parks.</p>
Should any sites within Appendix 1 be considered further for allocation?	
<p>Several options included within Appendix 1 were suggested by respondents for further consideration, including smaller sites to “spread” development, and one large site to accommodate all development.</p>	<p>These will be considered within the next stage of the Allocations DPD.</p>

Issue Raised	Initial Officer Comments
<p>It is the Highways Agency view that in advance of this DPD moving to its next stage, the traffic and transport implications of sites to be taken forward are assessed to an appropriate level of detail. This assessment should be in accordance with the advice issued to Local Planning Authorities in the Eastern Region by the Highways Agency in August 2007, the Department for Transport Circular 02/2007 Planning and the Strategic Road Network and the DfT Guidance on Transport Assessment (March 2007). It is also the Highways Agency view that Local Development Documents that have not been the subject of an assessment of potential transport impact may be regarded as unsound on the grounds of insufficient evidence base.</p>	<p>The Council is working with Essex County Council Highways to ensure the traffic implications of proposals are appropriately addressed. (Note: the Highways Agency is responsible for the motorway and trunk road network – there are no trunk roads in Rochford District).</p>
<p>It was questioned how the assessments shown in Appendix 1 were carried out and which benchmarks were used for assessment. There should be a description of how the proforma was used.</p>	<p>Appendix 1 was produced using data from the Local Development Framework evidence base.⁷</p>
<p>It was questioned why different types of flooding have not been considered within the assessment.</p>	<p>The assessment is based on flood risk information supplied by the Environment Agency, which includes fluvial and tidal flooding.</p>

⁷ Available to view via **www.rochford.gov.uk**, direct link:
www.rochford.gov.uk/planning_and_building_control/policy/local_development_framework/evidence_base.aspx, in addition to site visits.

Appendix 3 – Issues Raised by Specific and General Consultation Bodies during Pre-Submission Consultation

The following specific and general consultation bodies responded to the pre-submission consultation on the Allocations Document.

Anglian Water	Castle Point Borough Council	Environment Agency	Natural England
Basildon Borough Council	Chelmsford City Council	Essex County Council	Rawreth Parish Council
Canewdon Parish Council	English Heritage	Hawkwell Parish Council	Sport England

It should also be noted that as of 1 January 2012, the Coal Authority's response to any development plan consultations for the District is 'No observation'.

	Issues Raised	Initial Officer Comments
Introduction		
1	Basildon Borough Council welcomes Rochford District Council's proactive steps in making land available for future Gypsy and Traveller needs and employment development in line with its adopted Core Strategy.	Noted.
2	English Heritage commented that the policies in the Core Strategy relating to the historic environment are not as detailed as they could be, to take forward the positive approach to the historic environment that the NPPF recommends (paragraph 126). There should be a stronger emphasis on the historic environment in emerging development plan documents to reflect national policy.	Noted.

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	Issues Raised	Initial Officer Comments
3	Essex County Council supports the preparation of the Allocations Document and proposed allocations, particularly for residential and business development, community facilities and environmental designations.	Support noted.
4	<p>Essex County Council commented that the following documents should be added to the Evidence Base listed in paragraph 1.29;</p> <ul style="list-style-type: none"> • Preliminary Flood Risk Assessment (PFRA) - is a requirement under the Flood Risk Regulations (2009). The PFRA is a high level, county-wide analysis which considers past flooding and possible future flooding from, <ul style="list-style-type: none"> ❖ Essex Flood Risk Management Strategy – to be published Feb/March 2013 meets responsibilities under the Flood and Water Management Act (2010). This strategy looks at ways to tackle local flood risk in a co-ordinated way. It will identify some strategic actions needing to occur over the next two years and the underlying principles upon which to base future decisions. ❖ Surface Water Management Plans (SWMP) – these are plans which outline the preferred surface water management strategy for a given location. A SWMP will establish a long-term action plan to manage surface water in an area and should influence future capital investment, drainage maintenance, public engagement and understanding, land-use planning, 	<p>The evidence base section of the document can be amended to include reference to the Preliminary Flood Risk Assessment¹, which was published in January 2011, and the forthcoming Essex Flood Risk Management Strategy.</p> <p>However, the Plan already includes reference to the Surface Water Management Plan (page 11, fifth bullet).</p>

¹ Available from <http://www.essex.gov.uk/Environment%20Planning/Environmental-Issues/local-environment/flooding/Flood-water-management-strategies/Pages/Preliminary-Flood-Risk-Assessment.aspx>

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	Issues Raised	Initial Officer Comments
	emergency planning and future developments.	
5	Essex County Council commented that 'Surface Water Management Plan 2011' should read 'South Essex Surface Water Management Plan 2012' (page 11, fifth bullet).	Noted. The suggested amendment would clarify the extent of the plan.
6	Essex County Council commented that the 'Relationship with other LDF Documents' section should be amended to include appropriate and relevant reference to the status of the Minerals and Waste Local Plans.	This section can be amended to outline the relationship of the Council's LDF with the emerging Minerals and Waste Local Plans.
7	<p>Essex County Council commented that it should be noted that the Replacement Minerals Plan Pre-Submission Draft January 2013 safeguards the following two sites in Rochford District,</p> <ul style="list-style-type: none"> the Strategic Aggregate Recycling Site (SARS) at Purdey's Industrial Estate is safeguarded under Policy S5 'Creating a network of aggregate recycling facilities'; the coated stone plant at Suttons Wharf is considered to be of 'strategic importance' in policy terms and is safeguarded under Policy S9 'Safeguarding mineral transshipment sites and secondary processing facilities'. 	Noted.
8	Essex County Council is pleased at the identification of the Historic Environment within the Document and the specific mention of the Historic Environment Characterisation Report for the District. However, additional information should be included.	Noted.

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	Issues Raised	Initial Officer Comments
9	Essex County Council commented that potential development proposals should be prepared in accordance with the Institute of Ecological and Environmental Management (IEEM) guidelines for Ecological Impact Assessment (EclA).	Noted.
10	English Heritage commented that there are no references to the archaeological interest, or potential interest, in the policies and text for the individual site allocations. The allocations should be reviewed for their sensitivity to take forward Core Strategy policy ENV1, and to be in line with the guidance in the National Planning Policy Framework (NPPF).	<p>The potential for below ground archaeological deposits within the sites identified in the Plan has been taken into consideration in the development of the policies. The following evidence base documents has considered this issue for proposed Green Belt allocations:</p> <ul style="list-style-type: none"> • Detailed Assessment of Potential Employment Sites (March 2012) • Detailed Assessment of Potential Additional Employment Site Options (September 2012) • Detailed Assessment of Potential Residential Site Options (September 2012) <p>However, the policies should be amended to include reference to potential archaeological interest for each site.</p>
11	Advice should be sought from the county archaeologist, and where evaluation of sites reveals significant archaeological interest, revisions to the plan should be made in accordance with the significance of the remains. Additional requirements should be added to the parameters for development set out in the individual site allocation policies, as appropriate.	
12	Rawreth Parish Council commented that there appears to be no acknowledgement of previous consultations and publication of responses was delayed 12 months after publication of preferred site Allocations.	Noted.
13	Rawreth Parish Council commented that there is no overall Transport Risk Assessment and Traffic Impact Statement which would clearly show the effects of present and future housing on traffic flow on the existing road network. The Highway Authority has not objectively assessed the	The Council has considered highway infrastructure throughout the preparation of the Core Strategy and the Allocations Document. The Core Strategy (Appendix H1 in particular) identifies where improvements to the highway network would be required to accompany residential development in Policies H2 and H3. This was scrutinised during the Core Strategy examination.

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	Issues Raised	Initial Officer Comments
	infrastructure requirements taking account of present traffic and future traffic growth. Congestion issues have not been addressed and the necessary documentation does not form part of the evidence base.	Discussions have taken place with Essex County Council Highways to inform the development of the policies in the Plan ² . Furthermore a Transport Supplementary Planning Document is being produced which will provide further detail on transport and highway issues.
Brownfield Residential Land Allocations		
14	Anglian Water offer pre-planning services to developers to discuss infrastructure requirements.	Noted.
15	Environment Agency commented that there is a certain level of uncertainty about the capacity of Southend Waste Water Treatment Works to accept all the growth planned in its catchments. This should be acknowledged as a potential risk and the situation monitored over the plan period (Policy BFR1 and SER9).	<p>Amendments to the Concept Statement for Policy BFR1 and SER9 can be made to acknowledge this uncertainty. It should also be noted that Anglian Water support Policy BFR1 and SER9.</p> <p>However, the Environment Agency, since the end of the consultation, has advised in a letter to the Council dated 27 March 2013 that following a meeting with Anglian Water it can be confirmed that there is capacity at Southend Wastewater Treatment Works to accept the growth proposed by both Southend Borough Council and Rochford District Council. A copy of this letter is provided within this Appendix.</p>
16	Environment Agency advised that the text for Policy BFR3 needs to be revised to reflect the current situation with planning application 11/00494/FUL. It has not yet been proven that improvements to the development, in terms of flood risk mitigation, can be achieved on the site.	Noted, however, the expectation is that such improvements can be achieved, based on on-going discussions with prospective developers (see comment 32).

² Notes of Meeting with Highway and Public Transport Representatives at Essex County Council (22 February 2012), available from: http://www.rochford.gov.uk/sites/rochford.gov.uk/files/documents/files/planning_evi_base_highwaymeetingfeb.pdf
Rochford District Transportation and Highway Meeting (30 August 2012), available from: http://www.rochford.gov.uk/sites/rochford.gov.uk/files/documents/files/planning_evi_base_highwaymeetingaug.pdf

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	Issues Raised	Initial Officer Comments
17	English Heritage noted that standard wording is used for the SUDS requirement and suggest that it should be noted in the plan that balancing ponds, swales and changes to the water table etc. can have significant impacts on below ground archaeology, and these will need to be taken into account.	Amendments to the Concept Statements for Policies BFR1, BFR3 and BFR4 can be made accordingly. However, the site within Policy BFR2 has been considered in more detail within the emerging Hockley Area Action Plan.
18	Essex County Council commented that the Concept Statements for most proposed development sites include reference to green buffers, site boundary treatment, tree/hedge planting or habitat mitigation. For clarity and to make a positive contribution to local ecology the Concept Statement for each site should use, or adapt, as appropriate the statement in paragraph 5.58 which states: "landscaped green buffers should be provided in the form of publicly accessible green space, with conditions attached to ensure that it has ecological value".	The requirement to include green buffers, site boundary treatment, tree/hedge planting or habitat mitigation has been considered on a site-by-site basis, and included within the policies as appropriate. Publicly accessible green space may not necessarily be provided as a green buffer, and as such the proposed amendment is not considered to be appropriate. However, an amendment stating that the publicly accessible green space will have "conditions attached to ensure that it has ecological value" would be appropriate for inclusion within the Concept Statements.
19	<p>Essex County Council welcomes the promotion of SUDS within the Concept Statements for each site allocation. However, the existing text should be amended to include reference to,</p> <ul style="list-style-type: none"> the involvement of the Environment Agency - Essex County Council is not expected to become the SUDS Approving Body until at least April 2014 and therefore cannot officially comment/determine SUDS proposals until then. the need for a site specific flood risk assessment - any site drainage strategy for a site will be informed by and need to address issues arising from a specific flood risk assessment. the inclusion of source control as part of the SUDS 	The text within the Concept Statements can be amended as per Essex County Council's suggestion.

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	Issues Raised	Initial Officer Comments
20	<p>proposals - source control, i.e. the control of runoff or pollution at or near its source, will be needed as well as attenuation measures to ensure an acceptable sustainable drainage system.</p> <p>Essex County Council commented that the relevant text should be amended to read as follows and included as a paragraph in the Concept Statement of each proposed site allocation,</p> <p><i>“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. This could be incorporated into the greenspace provided on-site. 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.”</i></p>	
21	<p>Essex County Council commented that the Concept Statements provide limited evaluation of the sites and their infrastructure requirements. Masterplans/design briefs could be required prior to the submission of a planning application for all sites of a certain size or sensitivity setting out the vision for future development with design codes for larger sites where development will be phased (as supported by Paragraph 59 of the NPPF). A landscape strategy promoting green links and biodiversity corridors for each site should also be required.</p>	<p>The Concept Statements are intended to provide a guide to development of the sites, rather than provide prescriptive design requirements. It would be unreasonable to require the submission of a masterplan/design brief prior to the submission of a planning application, although such an approach would be supported and is expected to occur in the case of the development of many of the allocated sites.</p> <p>A requirement for applications to develop the site to be accompanied by a landscape strategy promoting green links and biodiversity corridors can be added to each Concept Statement, as appropriate.</p>

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	Issues Raised	Initial Officer Comments
22	Essex County Council commented that simple diagrams illustrating the principles/objectives referred to in the text would add clarity, particularly where connections are required between different sites or parts of a site that may be developed at different stages or post 2021, for example, between the land allocations for employment South of Great Wakering (NEL3), Star Lane Industrial Estate Great Wakering (BFR1) and land south of the High Street (SER9b).	The Concept Statements are intended to provide a guide to development of the sites, rather than provide prescriptive design requirements.
Policy BFR1		
23	Anglian Water support the use of SUDs and the requirement for consultation with the County Council, and also endorse the requirement for a foul and surface water drainage strategy for the site that should be agreed with Rochford before commencement of development.	Support noted.
24	Environment Agency commented that this allocation lies within the catchment of Southend Wastewater Treatment Works. There is uncertainty as to whether there is available capacity at the Works, and if not, whether they would be able to issue an increased flow permit without impacting on the environment. In addition development which would cause this Works to adversely impact the water environment as it discharges to the Thames Tideways should not be permitted.	<p>Noted. As above, the Concept Statement can be amended to acknowledge that there is a certain level of uncertainty about the capacity of Southend Waste Water Treatment Works to accept all the growth planned in its catchments.</p> <p>The suggested amendment can be made to paragraph 2.36.</p> <p>However, the Environment Agency, since the end of the consultation, has advised in a letter to the Council dated 27 March 2013 that following a meeting with Anglian Water it can be confirmed that there is capacity at Southend Wastewater Treatment Works to accept the growth proposed by both Southend</p>

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	Issues Raised	Initial Officer Comments
25	<p>Paragraph 2.36 may be amended to: “The capacity constraints in relation to Southend Wastewater Treatment Works are noted (both transfer and transmission). The Works discharge to the Thames Tideway which falls under the Bathing Waters Directive and Shellfish Waters Directive. Therefore, before planning permission is granted, the applicant will need to demonstrate that there is adequate capacity in the Works and that the development will not prevent the objectives of the Bathing Waters Directive and Shellfish Waters Directive from being met. Early engagement with Anglian Water and the Environment Agency will therefore be necessary.”</p>	<p>Borough Council and Rochford District Council. A copy of this letter is provided within this Appendix.</p>
26	<p>Environment Agency support the Concept Statement including the following:</p> <ul style="list-style-type: none"> • The relationship of the site to the employment area to the south. For your information, the site is in close proximity to a permitted waste site, Churn Waste Management Limited. This site is not currently operational but we have previously had local residents contact us regarding noise from the site. Waste sites may also produce dust, odour, vibration and pest issues; • That a green buffer is required adjacent to the Local Wildlife Site; • That SuDS need to be provided on site and a drainage strategy submitted; • That a contaminated land study will be required due to the previous uses of the site; • That upgrades to the sewerage network maybe required. 	<p>Support noted.</p>

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	Issues Raised	Initial Officer Comments
27	<p>Essex County Council commented that this is one of the few industrial estates in the District where there are relatively few environmental impediments to the establishment of a future waste treatment facility. Provision of housing on the site will introduce a sensitive use and make the estate potentially incompatible for waste uses. 'Guidance for local planning authorities on implementing planning requirements of the EU Waste Framework Directive (2008/98/EC)' (December 2012) is relevant to this issue. The Guidance expects those local planning authorities which do not deal directly with waste planning applications to contribute to delivery of the waste hierarchy. This includes working constructively with waste planning authorities to identify and protect those sites needed for waste management facilities and considering, where relevant, the likely impact of proposed, non-waste related development on existing waste management sites and on sites and areas allocated for waste management. Planning authorities should ensure that any such proposal does not prejudice the implementation of the waste strategy set out in the local Waste Plan. The County Council, as waste planning authority, would welcome discussion with the District Council to identify an alternative suitable industrial site within the District to accommodate waste treatment facilities that could have been established on this estate.</p>	<p>Rochford District Council is a stakeholder in the preparation of the emerging minerals and waste local plans. Whilst the pre-submission minerals local plan has been published for consultation, the pre-submission version of the waste local plan has yet to be published.</p>
28	<p>Essex County Council commented that in paragraph 2.34 the words 'Transport Impact Assessment' should be amended to read 'Transport Assessment'. Equivalent amendments should be made where a similar reference is made throughout the document.</p>	<p>The suggested amendment can be made to paragraph 2.34 and elsewhere in the document.</p>

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	Issues Raised	Initial Officer Comments
29	Essex County Council commented that although the southern section is a disused brickworks that has been cleared of all upstanding structures, it still retains considerable archaeological potential for the study of the county's industrial archaeology and in particular the development of brick making within the region (EHER 15369). Any redevelopment should be preceded by archaeological desk-based research and investigation of surviving underground deposits.	Noted. This requirement could be included within the Concept Statement.
Policy BFR2		
30	Hawkwell Parish Council commented that the brownfield sites identified including Eldon Way/Foundry sites all rely on land assembly and relocation, and that no overall traffic impact study to consider the effects of proposed development has been undertaken.	As acknowledged within the policy, proposals for the sites identified in Policy BFR2 and the wider area of the centre of Hockley will be considered in detail in the emerging Hockley Area Action Plan.
Policy BFR3		
31	Anglian Water support the use of SUDs and the requirement for consultation with the County Council, and also endorse the requirement for a foul and surface water drainage strategy for the site that should be agreed with Rochford before commencement of development.	Support noted.

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	Issues Raised	Initial Officer Comments
32	Environment Agency commented that to date the developer (with reference to planning application 11/00494/FUL) has been unable to submit information which demonstrates the flood defence works, required to make the development safe from flooding for its lifetime, can be delivered and maintained in perpetuity. They expressed concern that there is a risk that the site is not deliverable as evidence has yet to be provided that a viable scheme can be delivered.	The Environment Agency's concerns are noted, however, this is an issue which is specific to the detailed planning application for the site and the expectation is that such improvements can be achieved, based on on-going discussions with prospective developers. This issue should nevertheless be acknowledged as a risk to delivery in the Implementation, Delivery and Monitoring section of the Allocations Document.
33	Environment Agency commented that paragraph 2.55 advises the Sequential Test needs to be passed for any future development of the site, but this was considered and the test passed for the Core Strategy. In accordance with paragraph 104 of the NPPF this Test does not need to be applied again. This reference should be removed.	Noted. The reference the Sequential Test should be removed from paragraph 2.55.
34	Environment Agency support the Concept Statement in relation to the need for SUDs and a drainage strategy to be submitted; acknowledgement that upgrades to the foul water infrastructure network may be required; and that a management plan will be required given the proximity of the site to national and international designations.	Support noted.
35	Essex County Council commented that Stambridge Mills survives as a complex multi-period site comprising a wide range of buildings, structures and earthworks which together chart the development of an historic milling site dating from the 18th century or earlier. A building record of all surviving structures has been completed with no further archaeological conditions required.	Noted.

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	Issues Raised	Initial Officer Comments
Policy BFR4		
36	Anglian Water support the use of SUDs and the requirement for consultation with the County Council, and also endorse the requirement for a foul and surface water drainage strategy for the site that should be agreed with the Council before commencement of development.	Support noted.
37	Environment Agency support the Concept Statement acknowledging that a contaminated land study will be required due to the previous uses of the site; SUDs need to be provided and a drainage strategy submitted; and that upgrades to the foul water infrastructure network may be required.	Support noted.
38	Environment Agency strongly support setting aside flood risk areas for greenspace. A Flood Risk Assessment should support any future planning application to ensure all areas of Flood Zone are correctly identified. This requirement may be added to the policy as a minor amendment.	Site-specific Flood Risk Assessments are required to accompany planning applications within areas at risk of flooding as part of the Exceptions Text. This requirement is included within the NPPF, however, paragraph 2.109 is proposed to be amended as per Essex County Council's recommendations (see Comment 19 and 20).
39	Environment Agency comment that it would be beneficial if the policy could recognise the relationship of the site to the employment area nearby. There are several permitted waste sites on Rawreth Industrial Estate which could have issues associated with them which would cause nuisance to residents, for example noise, dust, odour and pests.	Paragraph 2.99 of the Concept Statement acknowledges the relationship between BFR4 and SER1, and it addresses potential phasing and integration issues between the two sites.

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	Issues Raised	Initial Officer Comments
40	Essex County Council commented that a number of brick-built World War II accommodation huts survive at the southern end of the industrial estate. These were associated with the heavy anti-aircraft gunsite TN4 'Rayleigh' (EHER 20133) sited here during World War II and are a rare survival. Where possible these buildings should be retained within any development. However if this proves impossible to achieve they will require a historic building survey to record the complex prior to any demolition.	A requirement to retain the buildings, where possible, provided that this would not adversely impact on the delivery of this site, could be included within the Concept Statement.
Settlement Extension Residential Land Allocations		
41	Anglian Water offer pre-planning services to developers to discuss infrastructure requirements.	Noted.
42	English Heritage noted that standard wording is used for the SUDS requirement and suggest that it should be noted in the plan that balancing ponds, swales and changes to the water table etc. can have significant impacts on below ground archaeology, and these will need to be taken into account.	Amendments to the Concept Statements for Policies SER1-SER9 can be made accordingly.
43	English Heritage welcome that several proposed site allocations recognise the need to protect the setting of heritage assets on adjoining land, and suggest that their guidance ('The setting of heritage assets') may be of assistance in considering this matter.	Noted.

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	Issues Raised	Initial Officer Comments
44	<p>Essex County Council welcomes the promotion of SUDS within the Concept Statements for each site allocation. However, the existing text should be amended to include reference to,</p> <ul style="list-style-type: none"> the involvement of the Environment Agency - Essex County Council is not expected to become the SuDS Approving Body until at least April 2014 and therefore cannot officially comment/determine SuDS proposals until then. The need for a site specific flood risk assessment - any site drainage strategy for a site will be informed by and need to address issues arising from a specific flood risk assessment. The inclusion of source control as part of the SuDS proposals - source control, i.e. the control of runoff or pollution at or near its source, will be needed as well as attenuation measures to ensure an acceptable sustainable drainage system. 	The text within the Concept Statements can be amended as per Essex County Council's suggestion.
45	<p>Essex County Council commented that the relevant text should be amended to read as follows and included as a paragraph in the Concept Statement of each proposed site allocation,</p> <p><i>“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. This could be incorporated into the greenspace provided on-site. Appropriate SUDS should be determined in consultation with Essex County Council and the Environment Agency. A site specific flood risk</i></p>	

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	Issues Raised	Initial Officer Comments
	<i>assessment incorporating a surface water drainage strategy should be prepared for the site.”</i>	
46	Essex County Council commented that the Concept Statements for most of the proposed development sites include reference to green buffers, site boundary treatment, tree/hedge planting or habitat mitigation. For clarity and to make a positive contribution to local ecology the concept statement for each site should use, or adapt, as appropriate the statement in paragraph 5.58 which states: “landscaped green buffers should be provided in the form of publicly accessible green space, with conditions attached to ensure that it has ecological value”.	The requirement to include green buffers, site boundary treatment, tree/hedge planting or habitat mitigation has been considered on a site-by-site basis, and included within the policies as appropriate. Publicly accessible green space may not necessarily be provided as a green buffer, and as such the proposed amendment is not considered to be appropriate. However, an amendment stating that the publicly accessible green space will have “conditions attached to ensure that it has ecological value” would be appropriate for inclusion within the Concept Statements.
47	Essex County Council commented that the Concept Statements provide limited evaluation of the sites and their infrastructure requirements. Masterplans/design briefs could be required prior to the submission of a planning application for all sites of a certain size or sensitivity setting out the vision for future development with design codes for larger sites where development will be phased (as supported by Paragraph 59 of the NPPF). A landscape strategy promoting green links and biodiversity corridors for each site should also be required.	<p>The Concept Statements are intended to provide a guide to development of the sites, rather than provide prescriptive design requirements. It would be unreasonable to require the submission of a masterplan/design brief prior to the submission of a planning application, although such an approach would be supported and is expected to occur in the case of the development of many of the allocated sites.</p> <p>A requirement for applications to develop the site to be accompanied by a landscape strategy promoting green links and biodiversity corridors can be added to each Concept Statement, as appropriate.</p>

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	Issues Raised	Initial Officer Comments
48	Essex County Council commented that simple diagrams illustrating the principles/objectives referred to in the text would add clarity, particularly where connections are required between different sites or parts of a site that may be developed at different stages or post 2021, for example, between the land allocations for employment South of Great Wakering (NEL3), Star Lane Industrial Estate Great Wakering (BFR1) and land south of the High Street (SER9b).	The Concept Statements are intended to provide a guide to development of the sites, rather than provide prescriptive design requirements.
49	Rawreth Parish Council objected to the preference and proposed use of Green Belt land over previously developed land. It would be contrary to the five objectives of the Green Belt set out in PPG2.	This issue was addressed during the Core Strategy examination. The adopted Core Strategy explains the need to reallocate Green Belt land to meet housing needs and identifies appropriate areas of previously developed land to be reallocated for residential use (Policy H1).
50	1. land to the north of London Road, Rayleigh is preferred over land at Hambro Nurseries in Rawreth, former nursery land at Weir Farm in Rayleigh and the site of Garden Centre and former nurseries in Eastwood Road, Rayleigh (which was put forward in the Call for Sites).	The general locations to the 'North of London Road, Rayleigh' and 'South West Hullbridge' are identified in the adopted Core Strategy. The Allocations Document, in identifying sites in these general locations, conforms to the Core Strategy.
51	2. proposed housing at Malyons Farm in Hullbridge is preferred over land at Nevendon South East Cars in Lower Road, Hockley (which was put forward in the Call for Sites).	
52	3. the relocation of Rawreth Industrial Estate to a Green Belt site on the A129 next to Swallows Aquatic Centre is preferred to brownfield land at Michelins Farm, adjacent to the A127 (which was put forward in the Call for Sites).	The Sustainability Appraisal supports the identification of two sites for employment use to the west of Rayleigh, given the different employment uses to be reallocated.

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	Issues Raised	Initial Officer Comments
53	4. contrary to Core Strategy Policy GB1 and H1, there would be erosion of Green Belt and the coalescence of two conurbations (Wickford/Shotgate and Rayleigh). If smaller, more appropriate brownfield sites were used, as put forward in the Call for Sites, this erosion and coalescence would not take place.	As above, the general location to the ‘North of London Road, Rayleigh’ is identified in the adopted Core Strategy. The Allocations Document, in identifying a site in this general location, conforms to the Core Strategy.
54	The land cited is brownfield land in the Green Belt that has been submitted to the Council through the Call for Sites for consideration but has been rejected. These sites could accommodate hundreds of dwellings with good access to existing infrastructure.	
Policy SER1		
55	Anglian Water commented that there is a foul sewer crossing the site that requires a 4 metre easement either side of the pipe and could effect the development of the site. This existing public sewer should be located in highway or public open space and should not be located in private gardens. If this is not possible, Anglian Water will consider an application under Section 185 Water Industry Act 1991 to divert the sewer (this would be at the developers expense).	Noted.
56	Chelmsford City Council commented that officers are pleased to see that previous suggestions for new community services and facilities as part of the development have been taken on board.	Noted.
57	Anglian Water support the requirement for SUDs.	Support noted.

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	Issues Raised	Initial Officer Comments
58	Environment Agency support the Concept Statement acknowledging that approximately 3.1ha of the site is within Flood Zone 2 and 3 and that this land should be set aside for public open space; and SUDs need to be provided and a drainage strategy submitted.	Support noted.
59	Environment Agency strongly support setting aside flood risk areas for public open space. A Flood Risk Assessment should support any future planning application to ensure all areas of Flood Zone are correctly identified. This requirement may be added to the policy as a minor amendment.	Site-specific Flood Risk Assessments are required to accompany planning applications within areas at risk of flooding as part of the Exceptions Text. This requirement is included within the NPPF, however, paragraph 3.40 is proposed to be amended as per Essex County Council's recommendations (see comment 44 and 45).
60	Sport England commented that although paragraph 3.37 requires the replacement of Rayleigh Sports and Social Club before the removal of existing facilities, it should be more detailed as follows:	Core Strategy Policy CLT10 cites Sport England guidance for the development of playing pitches and ancillary facilities. Further guidance will be provided within the Development Management Document. In addition, the Concept Statement requires the new structure to be built to BREEAM (Very good) standard.
61	Firstly, the Concept Statement should be more explicit in that the replacement playing field and ancillary facilities will need to be equivalent or better in both quantity and quality to the facilities that would be lost to ensure consistency with the Core Strategy (Policy CLT10) and the NPPF. The replacement playing pitches and ancillary facilities should be required to meet the design guidance of Sport England and the relevant sports governing bodies in order to ensure that the facilities are of a suitable quality and fit for purpose from a sports perspective as well as an environmental perspective (BREEAM).	

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	Issues Raised	Initial Officer Comments
62	Secondly, the Concept Statement should clarify that the tenure/management arrangements for the replacement playing fields/ancillary facilities to be equivalent or better than the current arrangements, as a poor arrangement could impact on the viability of the club.	It would not be appropriate to set out detailed matters in relation to tenure agreements in a planning document such as the Allocations Document.
63	Thirdly, although relocation of the club within the broad location should not affect existing users of the facilities, to avoid an unsuitable location and access being proposed the policy should make provision for a master plan/framework plan for the whole site to be submitted and approved in advance of any planning application in order to ensure that the location is acceptable in practice.	It would be unreasonable to require the submission of a masterplan/design brief prior to the submission of a planning application, but it is nevertheless the expectation that one will be provided by an applicant as part of the planning application process to demonstrate how the applicant has met the policy requirements.
64	Fourthly, the proposal for the clubhouse and associated development to be positioned adjacent to the new residential settlement is of potential concern because the use of the current Rayleigh Sports & Social Club's clubhouse for social functions during the evenings/weekends would raise potential residential amenity concerns such as noise. The relocation of the clubhouse could threaten this use and the long term viability of the facilities. The Concept Statement should be amended to make provision for the clubhouse and associated facilities being relocated where the continued use of the clubhouse for social functions will not be prejudiced by residential amenity concerns.	Comment noted. The clubhouse should be located in such a way that it is accessible to local residents but does not have an adverse impact on the amenity of nearby residents. Exact details will be determined at the planning application stage. It is recommended that the requirement in relation to the clubhouse is amended to make clear that whilst it is expected that it will be located within 340 metres of its existing location, an alternative location within the vicinity may be acceptable if this is shown to be more appropriate (paragraph 3.37).

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	Issues Raised	Initial Officer Comments
65	Lastly, the Concept Statement should make reference to the need for engagement with Sport England before a planning application is submitted in order to ensure that the issues raised above can be satisfactorily addressed in practice in order to avoid the potential delays and uncertainty associated with delivering the residential development if a statutory objection is made due to replacement playing field provision not being considered acceptable.	Reference to the need for consultation with Sport England can be included within the Concept Statement (paragraph 3.37).
66	Sport England commented that the Concept Statement should incorporate the recommendations within the Playing Pitch Strategy. The Concept Statement should be amended to make provision for additional playing pitch provision to be made in accordance with the Council's playing pitch standards (an area should be specified to provide clarity). Provision should be made through extending the replacement Rayleigh Sports and Social Club site (i.e. the replacement playing field and ancillary facilities would be larger than the existing facilities to accommodate the needs of the development as well as replacing the facilities that serve the existing community). This would ensure that the policy accords with the Playing Pitch Strategy, Core Strategy and NPPF.	The Concept Statement does not state that the replacement should be on a like-for-like basis, and as such it should be amended to include specific reference to the Playing Pitch Strategy (paragraph 3.37).
67	Essex County Council commented that in paragraph 3.17, first bullet, the text should be extended to include the words 'with commensurate early years and childcare provision' to reflect the full requirement for provision of education facilities on the site.	Paragraph 3.17 reflects the infrastructure requirements for this site as set out in Appendix H1 of the Core Strategy. This site is not required to deliver early years and childcare provision.

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	Issues Raised	Initial Officer Comments
68	Essex County Council commented that Figure 7 should be deleted as being a matter more appropriate for inclusion in a masterplan or design brief where possible highway and transport links can be directly related and integrated with green links, biodiversity corridors and relationship to adjacent development. Subsequently, paragraph 3.27 should be amended to simply note that the means access and scope of transport assessment should be explored with Essex County Council Highways, to include the site being served by public transport and designed to ensure that it is not used as a through route for private traffic.	Figure 7 was discussed in consultation with Essex County Council Highways. It is considered appropriate to retain this diagram within the Plan to illustrate one of the potential options for the site. The diagram does not purport to be definitive; and its inclusion does not preclude the inclusion of green links or biodiversity corridors in a future masterplan.
69	Essex County Council commented that a pre-determination assessment (by fieldwalking and geophysical survey) of the archaeology on-site is currently ongoing. Any future large scale housing development would require an agreed programme of work, depending on the present evaluation and any future trial trenching to ensure that the historic environment assets are either protected in situ or preserved by excavation.	Noted.
Policy SER2		
70	Anglian Water support the use of SUDs and the requirement for consultation with the County Council, and also endorse the requirement for a foul and surface water drainage strategy for the site that should be agreed with Rochford before commencement of development.	Support noted.

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	Issues Raised	Initial Officer Comments
71	Environment Agency support the Concept Statement acknowledging that part of the site is within Flood Zone 2 and 3 and that this land should be set aside for public open space; SUDs need to be provided and a drainage strategy submitted; and that capacity in the foul water network will need modelling at the planning application stage due to capacity issues at the pumping station downstream.	Support noted.
72	Environment Agency strongly support setting aside flood risk areas for public open space. A Flood Risk Assessment should support any future planning application to ensure all areas of Flood Zone are correctly identified. This requirement may be added to the policy as a minor amendment.	Site-specific Flood Risk Assessments are required to accompany planning applications within areas at risk of flooding as part of the Exceptions Text. This requirement is included within the NPPF, however, paragraph 3.70 is proposed to be amended as per Essex County Council's recommendations (see comment 44 and 45).
73	Essex County Council commented that, as the Minerals Planning Authority, the NPPF requires them to define Mineral Safeguarding Areas within their Local Plans. The County Council has done this through Policy S8 (Safeguarding mineral resources and mineral reserves) in the Replacement Minerals Plan Pre-Submission Draft January 2013.	Noted. This draft has been consulted on from 17 January 2013 to 28 February 2013.
74	To ensure compatibility and consistency between the Allocations Document and the Minerals Local Plan the following text should be added to the Concept Statement for this site: 'The site is within a Minerals Safeguarding Area and therefore consultation on the proposed development of the site with Essex County Council is required'.	The proposed amendment can be included within the Concept Statement to ensure that this requirement is considered in the determination of planning applications.

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	Issues Raised	Initial Officer Comments
75	Essex County Council commented that the precise site boundary of the proposed education facilities on the site has been agreed through a s106 agreement and could be indicated on Figure 8.	The site to accommodate residential development and accompanying development (including educational facilities) is clearly identified. It is considered, given that the educational facilities have yet to be developed, unnecessarily restrictive to allocate a specific allocation for this use within the broader allocation.
76	Essex County Council commented that a pre-determination assessment (by trenching) of the archaeology on-site has been completed. The results are expected shortly and will be used to ensure that there is appropriate management and/or a mitigation strategy agreed to protect the historic environment assets that will be impacted.	Noted.
Policy SER3		
77	Environment Agency support the Concept Statement acknowledging SUDs need to be provided and a drainage strategy submitted; and a contaminated land study will be required due to the previous uses of the site.	Support noted.
78	Essex County Council commented that for those parts of the site not previously developed, a programme of archaeological evaluation should be undertaken to ensure that the Historic Environment is taken into account at an early stage and to make sure that opportunities for pro-active assessment, management and enhancement are fully considered. Consideration should also be given to the landscape character of the area and the woodland setting.	Noted.

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	Issues Raised	Initial Officer Comments
Policy SER4		
79	Environment Agency support the Concept Statement acknowledging that part of the site is within Flood Zone 2 and 3 and that this land should be set aside for public open space; a contaminated land study will be required due to the previous uses of the site; SUDs need to be provided and a drainage strategy submitted; and that capacity in the foul water network will need modelling at the planning application stage due to sewer flooding downstream.	Support noted.
80	Environment Agency strongly support setting aside flood risk areas for public open space. However, the Strategic Flood Risk Assessment shows areas of the site are modelled to be Flood Zone 3b (functional floodplain). The technical guide to the NPPF advises that only water compatible and essential infrastructure uses (as set out in Table 2 of this document) would be appropriate in this area. Open space would therefore be suitable but a Flood Risk Assessment should support any future planning application to ensure all areas of Flood Zone are correctly identified. This requirement may be added to the policy as a minor amendment.	Site-specific Flood Risk Assessments are required to accompany planning applications within areas at risk of flooding as part of the Exceptions Text. This requirement is included within the NPPF, however, paragraph 3.129 is proposed to be amended as per Essex County Council's recommendations (see comment 44 and 45).
81	Hawkwell Parish Council commented that developments in Hawkwell, Rochford and Ashingdon have already been granted planning permission, but a traffic impact study should have been conducted prior to this.	Transport assessments have been undertaken as part of the planning applications in these locations.

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	Issues Raised	Initial Officer Comments
82	Essex County Council commented that this site has the potential to support European Protected Species.	Noted. There is currently no evidence to suggest that the site supports any European Protected Species. Further investigation and any necessary mitigation will be required at the planning application stage. It is also relevant to note that the proposed allocations have been subject to a Habitats Regulation Assessment which has identified no significant effects on European Sites.
83	Essex County Council commented that the proposed development south of Hawkwell lies within Historic Environment Characterisation Zone 26. Any future housing development would require a programme of archaeological evaluation to ensure that the historic environment is taken into account at an early stage and to make sure that opportunities for pro-active assessment, management and enhancement are fully considered.	Noted.
Policy SER5		
84	Anglian Water support the use of SUDs and the requirement for consultation with the County Council, and also endorse the requirement for a foul and surface water drainage strategy for the site that should be agreed with Rochford before commencement of development.	Support noted.
85	Environment Agency support the Concept Statement acknowledging SUDs need to be provided and a drainage strategy submitted; and that capacity in the foul water network will need modelling at the planning application stage due to sewer flooding downstream.	Support noted.

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	Issues Raised	Initial Officer Comments
86	Essex County Council commented that, as the Minerals Planning Authority, the NPPF requires them to define Mineral Safeguarding Areas within their Local Plans. The County Council has done this through Policy S8 (Safeguarding mineral resources and mineral reserves) in the Replacement Minerals Plan Pre-Submission Draft January 2013.	Noted. This draft has been consulted on from 17 January 2013 to 28 February 2013.
87	To ensure compatibility and consistency between the Allocations Document and the Minerals Local Plan the following text should be added to the Concept Statement for this site: 'The site is within a Minerals Safeguarding Area and therefore consultation on the proposed development of the site with Essex County Council is required'.	The proposed amendment can be included within the Concept Statement to ensure that this requirement is considered in the determination of planning applications.
88	Essex County Council commented that paragraph 3.141 should specifically identify the proposed improved access/egress to King Edmund School, which is the subject of a Section 106 agreement, and show the precise site boundary of the proposed new bus/car park for King Edmund School on Figure 11 (page 53).	Paragraph 3.141 specifically requires a new improved access / egress to King Edmund School. It is considered, given that the access has yet to be developed, unnecessarily restrictive to allocate a specific allocation for this use within the broader allocation.
Policy SER6		
89	Environment Agency support the Concept Statement acknowledging SUDs need to be provided and a drainage strategy submitted; and that upgrades to the foul water infrastructure network may be required.	Support noted.

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	Issues Raised	Initial Officer Comments
90	Environment Agency consider it possible to confirm that, contrary to paragraph 3.184, Rayleigh Waste Water Treatment Works (WWTWs) there is adequate capacity for the development. However they suggest clarification on this matter with Anglian Water Services before amending the policy.	Noted. However, paragraph 3.184 was based on the most up to date information available in the Water Cycle Study.
91	Hullbridge Parish Council commented that there are insufficient details for measures to be taken to alleviate flooding from surface water, to improve the road network or to improve provision of adequate sewerage. Detailed studies should be undertaken assessing surface water flooding, road network capacity and sewerage capacity.	<p>Surface water flooding has been addressed in detail within the Surface Water Management Plan. Studies on the local road network and sewerage will be provided at the planning application stage and statutory consultees including the Environment Agency/Essex County Council, Essex County Council Highways, and Anglian Water will be consulted.</p> <p>It is relevant to note that Anglian Water, Environment Agency and Essex County Council have all responded to the consultation and none have raised any concerns in relation to these issues for this site.</p>
92	Hullbridge Parish Council commented that there would be a lack of community cohesion as part of the proposed development would be attached to Hullbridge but be within the Rawreth Parish boundary. The parish boundary needs to be re-aligned to include all the development within Hullbridge.	The proposed development will form part of the village of Hullbridge.

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	Issues Raised	Initial Officer Comments
93	Sport England states that the Playing Pitch Strategy identifies mini and junior football pitch deficiencies within the District, and that additional needs will be generated by the development. Whilst providing for other facilities, the Concept Statement does not require additional playing pitch provision, and as such the policy does not accord with the evidence base, Core Strategy or NPPF. The Concept Statement should be amended to make provision for additional playing pitch provision to be made in accordance with the Council's playing pitch standards (an area should be specified to provide clarity) and that provision should be made as part of the new open space provision to be made within the development.	The Playing Pitch Strategy suggests that whilst there is likely to be an under provision of junior and mini soccer pitches in proximity to Hullbridge, there is an oversupply of adult pitches. New open space provision may include the provision of new mini and junior football pitches, but it is considered to be overly restrictive and inflexible for the Allocations Document to demand provision in this form at this juncture.
94	Essex County Council commented that this site has the potential to support European Protected Species.	Noted. There is currently no evidence to suggest that the site supports any European Protected Species. Further investigation and any necessary mitigation will be required at the planning application stage. It is also relevant to note that the proposed allocations have been subject to a Habitats Regulation Assessment which has identified no significant effects on European Sites.
95	Essex County Council commented that paragraph 3.178 should be amended to note that highway improvements would focus on the strategic network, which includes the junction of Hullbridge Road/Watery Lane. Watery Lane is not part of the strategic network and the reference to improvements should be deleted.	Whilst Watery Lane may not technically form part of the strategic highway network, it is nevertheless of local importance and the Core Strategy (Appendix H1) identified that infrastructure improvements, including improvements to Watery Lane and the Watery Lane/Hullbridge Road junction would be required to accompany development of the site. Consequently Watery Lane should not be deleted from paragraph 3.178.

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	Issues Raised	Initial Officer Comments
96	Essex County Council commented that this site falls within Historic Environment Character Zone 36. Two known undated earthworks at Maylons and South of Maylons lie within the proposed development area while a medieval moated site is located close by. A programme of archaeological evaluation would be required to ensure that the historic environment is taken into account at an early stage and to make sure that opportunities for pro-active assessment, management and enhancement are fully considered.	Noted.
Policy SER7		
97	Anglian Water support the use of SUDs and the requirement for consultation with the County Council, and also endorse the requirement for a foul and surface water drainage strategy for the site that should be agreed with Rochford before commencement of development.	Support noted.
98	Canewdon Parish Council strongly objects to development west of Church Road due to lack of a defensible Green Belt boundary. Anchor Lane and Church Road provide a strong defensible boundary and development should be restricted to the east of Church Road. The proposed site should be reconsidered.	The proposed site would meet the dwelling and infrastructure requirements for this general location and would enable the creation of a defensible Green Belt boundary as the western section of the site is bounded by roads to the east and south and dwellings to west (paragraph 3.191). Although there is greenfield land to the north, due to the sensitive topography in this location, the policy proposes to allocate land to the north as public open space. This would also enhance the defensibility of the Green Belt boundary in this location.
99	Canewdon Parish Council expressed concerns about highway capacity and the networks ability to cope with future development throughout the District.	Impact of proposed development on the highway network has been considered throughout the development of the Core Strategy and Allocations Document. The Core Strategy requires that local highway capacity and infrastructure improvements accompany any development in this location.

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	Issues Raised	Initial Officer Comments
100	Environment Agency support the Concept Statement acknowledging SUDs need to be provided and a drainage strategy submitted; and that upgrades to the downstream sewers are likely to be required prior to the development.	Noted.
101	English Heritage expressed concern regarding the very significant impact that development of this site would have on the setting of St Nicholas church, which is listed grade II*. As the description notes in paragraphs 3.200 and 3.201, the topography is sensitive, and the position of the church on the high ground is prominent.	<p>The Plan takes into account the sensitive topography in the area and the views and setting of the church through the inclusion of public open space to the north of the proposed site. Impact on the setting of all the Listed Buildings in proximity to the site would be carefully considered at the planning application stage (paragraph 3.207). Further detail is provided within the evidence base document Detailed Assessment of Potential Residential Site Options (September 2012).</p> <p>The proposed allocation recognises and accounts for the importance of the setting of St Nicholas Church.</p>
102	English Heritage has no objection to the allocation of the eastern part of the site, which will simply reinforce the settlement boundary, but object to the allocation on the west side of the lane due to its impact on the setting of the church. Taking account of the NPPF (paragraph 132), this part of the development site should be deleted from the plan. English Heritage's guidance on the setting of heritage assets should also be applied.	<p>The Plan takes into account the sensitive topography within the area and the views and setting of the church through the inclusion of public open space to the north. Impact on the setting of all the Listed Buildings in proximity to the site would be carefully considered at the planning application stage (paragraph 3.207). Further detail is provided within the evidence base document Detailed Assessment of Potential Residential Site Options (September 2012).</p> <p>The proposed allocation recognises and accounts for the importance of the setting of St Nicholas Church.</p> <p>The Concept Statement can be amended to include reference to English Heritage's guidance ('The Setting of Heritage Assets').</p>

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	Issues Raised	Initial Officer Comments
103	Essex County Council commented that this site falls within Historic Environment Character Zone 12. By comparison with similar settlements it is reasonable to assume that archaeological remains survive within, and in the proximity of, the historic settlement, particularly those historic assets associated with the coast and historic core. A programme of archaeological evaluation would be required to ensure that the historic environment is taken into account at an early stage and to make sure that opportunities for pro-active assessment, management and enhancement are fully considered.	Noted.
Policy SER8		
104	Anglian Water support the use of SUDs and the requirement for consultation with the County Council, and also endorse the requirement for a foul and surface water drainage strategy for the site that should be agreed with Rochford before commencement of development.	Support noted.
105	Environment Agency support the Concept Statement acknowledging SUDs need to be provided and a drainage strategy submitted; that capacity in the foul water network will need modelling at the planning application stage due to downstream sewer flooding events; and that a management plan is required given the proximity of the site to a Local Wildlife Site.	Noted.
106	Hawkwell Parish Council expressed concern that developers would argue for post-2021 sites to come forward earlier in the plan period.	This flexibility in terms of site delivery is integrated into the Core Strategy and consequently the Allocations Document.

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	Issues Raised	Initial Officer Comments
107	Hawkwell Parish Council note that provision is made for an increase of up to 5% dwellings per site, but express concern that developers will take advantage of this flexibility and it will become the norm.	Concern noted, however, this flexibility is caveated to ensure that the Core Strategy dwelling requirement is not exceeded (paragraph 3.223): <ul style="list-style-type: none"> • The additional number of dwellings are required to maintain a five year-land supply; and • The additional number of dwellings to be provided on the site is required to compensate for a shortfall of dwellings that had been projected to be delivered within the location identified in the adopted Core Strategy.
108	Hawkwell Parish Council questioned whether another two access/egress points on to the Ashingdon Road is advisable.	Two access/egress points are required given the number of dwellings proposed for the site.
109	Sport England states that the Playing Pitch Strategy identifies mini and junior football pitch deficiencies within the District, and that additional needs will be generated by the development. Whilst providing for other facilities, the Concept Statement does not require additional playing pitch provision, and as such the policy does not accord with the evidence base, Core Strategy or NPPF. The Concept Statement should be amended to make provision for additional playing pitch provision to be made in accordance with the Council's playing pitch standards (an area should be specified to provide clarity) and that provision should be made as part of the new open space provision to be made within the development.	The Playing Pitch Strategy suggests that whilst there is likely to be an under provision of junior and mini soccer pitches within the Rochford/Ashingdon/Canewdon area, there is an oversupply of adult pitches (as well as cricket, rugby and hockey pitches). New open space provision may include the provision of new mini and junior football pitches, but it is considered to be overly restrictive and inflexible for the Allocations Document to demand provision in this form at this juncture.
110	Essex County Council commented that, as the Minerals Planning Authority, the NPPF requires them to define Mineral Safeguarding Areas within their Local Plans. The County Council has done this through Policy S8 (Safeguarding mineral resources and mineral reserves) in the Replacement Minerals Plan Pre-Submission Draft January 2013.	Noted. This draft has been consulted on from 17 January 2013 to 28 February 2013.

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	Issues Raised	Initial Officer Comments
111	<p>To ensure compatibility and consistency between the Allocations Document and the Minerals Local Plan the following text should be added to the Concept Statement for this site:</p> <p>'The site is within a Minerals Safeguarding Area and therefore consultation on the proposed development of the site with Essex County Council is required'.</p>	<p>The proposed amendment can be included within the Concept Statement to ensure that this requirement is considered in the determination of planning applications.</p>
112	<p>Essex County Council commented that this policy should require that the Management Plan for the Local Wildlife Site should be prepared and taken into account, as appropriate, during design and construction phases and its disturbance should be avoided.</p>	<p>Comment noted. Paragraph 3.238 can be amended to ensure that a management plan for the Local Wildlife Site is prepared during the design and construction phases and its disturbance should be avoided. However, this proposed site is not adjacent to the Local Wildlife Site, and its development may not directly impact on the Local Wildlife Site.</p>
113	<p>Essex County Council commented that in paragraph 3.218 the word 'access' should be amended to read 'accesses' because the proposed development is a minimum of 500 dwellings for which a single access is insufficient.</p>	<p>Noted. However, the plan recognises at paragraph 3.239 that at least two vehicular access points onto Ashingdon Road should be provided.</p>
114	<p>Essex County Council commented that paragraph 3.240 should be extended to state that 'All internal layout options should be considered in line with the Essex Design Guide'.</p>	<p>Noted. However, this will be included as a general requirement for all new development in the emerging Development Management Document.</p>
115	<p>Essex County Council commented that paragraph 3.242, second sentence, should be amended to read 'Pedestrian and cycle routes to south of site.....'.</p>	<p>The suggested amendment would clarify that both pedestrian and cycling routes should be provided to the south of the site.</p>

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	Issues Raised	Initial Officer Comments
116	Essex County Council commented that this site lies within Historic Environment Character Zone 13. Although there is limited archaeological knowledge within the limits of the proposed site, the area has been identified as being sensitive to change. A programme of archaeological evaluation would be required to ensure that the historic environment is taken into account at an early stage and to make sure that opportunities for pro-active assessment, management and enhancement are fully considered.	Noted.
Policy SER9		
117	Anglian Water support the use of SUDs and the requirement for consultation with the County Council, and also endorse the requirement for a foul and surface water drainage strategy for the site that should be agreed with Rochford before commencement of development.	Support noted.
118	Environment Agency commented that this allocation lies within the catchment of Southend Wastewater Treatment Works. There is uncertainty as to whether there is available capacity at the Works, and if not, whether they would be able to issue an increased flow permit without impacting on the environment. In addition development which would cause this Works to adversely impact the water environment as it discharges to the Thames Tideways should not be permitted.	<p>Noted. As above, the Concept Statement can be amended to acknowledge that there is a certain level of uncertainty about the capacity of Southend Waste Water Treatment Works to accept all the growth planned in its catchments.</p> <p>The suggested amendment can be made to paragraph 2.282.</p> <p>However, the Environment Agency, since the end of the consultation, has advised in a letter to the Council dated 27 March 2013 that following a meeting with Anglian Water it can be confirmed that there is capacity at Southend Wastewater Treatment Works to accept the growth proposed by both Southend</p>

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	Issues Raised	Initial Officer Comments
119	<p>Paragraph 2.282 may be amended to: “The capacity constraints in relation to Southend Wastewater Treatment Works are noted (both transfer and transmission). The Works discharge to the Thames Tideway which falls under the Bathing Waters Directive and Shellfish Waters Directive. Therefore, before planning permission is granted, the applicant will need to demonstrate that there is adequate capacity in the Works and that the development will not prevent the objectives of the Bathing Waters Directive and Shellfish Waters Directive from being met. Early engagement with Anglian Water and the Environment Agency will therefore be necessary.”</p>	<p>Borough Council and Rochford District Council. A copy of this letter is provided within this Appendix.</p>
120	<p>Environment Agency support the Concept Statement including the following:</p> <ul style="list-style-type: none"> • The relationship of the site to the employment area to the south. For your information, the site is in close proximity to a permitted waste site, Churn Waste Management Limited. This site is not currently operational but we have previously had local residents contact us regarding noise from the site. Waste sites may also produce dust, odour, vibration and pest issues; • That a green buffer is required adjacent to the Local Wildlife Site; • That SuDS need to be provided on site and a drainage strategy submitted; • That a contaminated land study will be required due to the previous uses of the site; • That upgrades to the sewerage network maybe required. 	<p>Support noted.</p>

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	Issues Raised	Initial Officer Comments
121	Essex County Council commented that, as the Minerals Planning Authority, the NPPF requires them to define Mineral Safeguarding Areas within their Local Plans. The County Council has done this through Policy S8 (Safeguarding mineral resources and mineral reserves) in the Replacement Minerals Plan Pre-Submission Draft January 2013.	Noted. This draft has been consulted on from 17 January 2013 to 28 February 2013.
122	To ensure compatibility and consistency between the Allocations Document and the Minerals Local Plan the following text should be added to the Concept Statement for this site: 'The site is within a Minerals Safeguarding Area and therefore consultation on the proposed development of the site with Essex County Council is required'.	The proposed amendment can be included within the Concept Statement to ensure that this requirement is considered in the determination of planning applications.
123	Essex County Council commented that this policy should require that the Management Plan for the Local Wildlife Site should be prepared and taken into account, as appropriate, during design and construction phases and its disturbance should be avoided.	Comment noted. Paragraph 3.263 can be amended to ensure that a management plan for the Local Wildlife Site is prepared during the design and construction phases and its disturbance should be avoided.
124	Essex County Council commented that this site has the potential to support European Protected Species.	Noted. There is currently no evidence to suggest that the site supports any European Protected Species. Further investigation and any necessary mitigation will be required at the planning application stage. It is also relevant to note that the proposed allocations have been subject to a Habitats Regulation Assessment which has identified no significant effects on European Sites.

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	Issues Raised	Initial Officer Comments
125	Essex County Council commented that paragraph 3.277 should be amended to read 'Pedestrian and cycle routes to the north...'. 	The suggested amendment would clarify that both pedestrian and cycling routes should be provided to the north of the site.
126	Essex County Council commented that these sites lie within Historic Environment Character Zone 7. Brickearth quarrying has had a significant impact upon the historic environment although there remains a high potential for archaeological remains in those areas not previously subject to quarrying. For those areas not quarried there would be a requirement for a programme of archaeological evaluation to ensure that the historic environment is taken into account at an early stage and to make sure that opportunities for pro-active assessment, management and enhancement are fully considered.	Noted.
Policy GT1		
127	Anglian Water advised that if a development is not in proximity to an existing sewerage network, connection and extension costs to the network would need to be considered. With regard to septic tanks, the Environment Agency should be consulted.	Noted.
128	Basildon Borough Council objects to the preference for the site identified in Policy GT1 over the alternative options identified in the Discussion and Consultation Document and its located adjacent to existing and proposed industrial uses.	Noted.

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	Issues Raised	Initial Officer Comments
129	Land identified within Option GT3 has been incorporated within Policy NEL1 to the south of London Road, Rayleigh for new employment land.	Noted.
130	An alternative option to the south of London Road should be considered. Land at the western end of NEL1 could be allocated for a Gypsy and Traveller site, where it can be nearer to existing residential areas, facilities and services, which were appraised as being an advantage to Option GT3, but away from the pylon line. The remainder of NEL1 should be brought forward for employment use.	Land to the south of London Road in Rayleigh (NEL1) was considered in the Discussion and Consultation Document for both new employment land and a Gypsy and Traveller site. Assessment of these options, including through Sustainability Appraisal, indicated that the proposed allocations arrangement is more sustainable. In particular, there are concerns in respect of overhead power lines at NEL1, and the appropriateness of allocating a residential use under these.
131	All potential land identified in Policy NEL2 and GT1 could therefore be brought forward for employment use (compensating for the loss within NEL1).	
132	Castle Point Borough Council commented that the potential impacts on the strategic highway network have not been assessed to date. Without this information it is unclear whether allocations GT1 and NEL2 are suitable.	Proposed development at this location has formed part of discussions with Essex County Council. Policy NEL2 makes clear that appropriate highway access will have to be implemented prior to any development of the site for employment uses.
133	Allocations GT1 and NEL2 should be removed from the Allocations Document if evidence cannot be provided that the impacts of these allocations on the strategic highway network have been assessed, and proposals put in place to minimise such impacts to an acceptable level.	
134	Castle Point Borough Council commented that proposed allocations GT1 and NEL2 have the potential to impact on the strategic purpose of the Green Belt, and to set a precedent for similar developments elsewhere along the A130 corridor.	Comment noted, however, the site identified is constrained by the A1245, the A127, employment land and a railway line.

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	Issues Raised	Initial Officer Comments
135	In order to conform with paragraph 81 of the NPPF, opportunities should be sought to enhance the landscape and visual amenity of this site. Greater consideration to such matters could be given in the supporting text of these allocations. Impact on the openness of the Green Belt should also be minimised.	The Concept Statement requires that existing trees and hedgerows along the boundaries of the site are retained and enhanced (paragraph 5.40) and that any loss of trees should be replaced on a like-for-like basis (paragraph 5.41).
136	The outcomes of joint working to prepare a landscape strategy for the A130 corridor should inform the landscape and design requirements of these allocations.	Noted. This strategy would form part of the evidence base for the Council's plans.
137	Chelmsford City Council consider it would have been helpful if the DPD included information on the criteria used to select this site, as well as greater details on whether the landowners are willing to release the site for this purpose.	Broad criteria used when identifying potential options for the allocation of a Gypsy and Traveller site and then selecting the preferred site is set out within Policy H7 of the Core Strategy.
138	The site assessment for this proposal will be contained within the Sustainability Appraisal which will be published for consultation at a later date.	<p>The alternative options and the preferred site have been appraised within the Sustainability Appraisal, which was available for comment during the pre-submission consultation.</p> <p>In addition, further appraisal of the different site options considered was undertaken to inform the site selection, including landscape and visual assessment, within the Detailed Assessment of Potential Residential Site Options (Evidence Base Document) September 2012.</p>
139	Environment Agency support the Concept Statement acknowledging that a contaminated land study will be required due to the previous uses of the site.	Support noted.

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	Issues Raised	Initial Officer Comments
140	Environment Agency advised that the site is not near to a main sewer, and so private means of disposal should be considered. However a septic tank and soakaway may not be suitable on this site as a soakaway could potentially mobilise contaminants in the ground.	Noted.
141	An alternative option may be to install a package sewage treatment plant and discharge treated sewage effluent into an adjacent watercourse. If this option is progressed then suitable access will be required to ensure there is adequate room for tanker access required to de-sludge. In this case, some changes to the wording of this policy as a minor amendment should be considered.	
142	In addition, the watercourses running through the site are classed as 'ordinary watercourses' and the applicant maybe required to obtain a Flood Defence Consent from Essex County Council for works by or in the river.	
143	Essex County Council commented that the site access/egress to the proposed allocation would contribute to congestion and safety concerns at this strategic junction and be contrary to a number of current Highways Development Management Policies. Nevertheless, it may be possible to cater for the traffic movements arising from not more than 15 gypsy and traveller pitches in a manner that has minimum impact on existing levels of traffic movement and safety. Accordingly, the local highway authority would wish to further discuss with the district council the potential traffic implications of this proposed allocation.	Noted.

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	Issues Raised	Initial Officer Comments
New Employment Land Allocations		
144	English Heritage noted that standard wording is used for the SUDS requirement and suggest that it should be noted in the plan that balancing ponds, swales and changes to the water table etc. can have significant impacts on below ground archaeology, and these will need to be taken into account.	Amendments to the Concept Statements for Policies NEL1-NEL3 can be made accordingly.
145	<p>Essex County Council welcomes the promotion of SUDS within the Concept Statements for each site allocation. However, the existing text should be amended to include reference to,</p> <ul style="list-style-type: none"> the involvement of the Environment Agency - Essex County Council is not expected to become the SuDS Approving Body until at least April 2014 and therefore cannot officially comment/determine SuDS proposals until then. The need for a site specific flood risk assessment - any site drainage strategy for a site will be informed by and need to address issues arising from a specific flood risk assessment. The inclusion of source control as part of the SuDS proposals - source control, i.e. the control of runoff or pollution at or near its source, will be needed as well as attenuation measures to ensure an acceptable sustainable drainage system. 	The text within the Concept Statements can be amended as per Essex County Council's suggestion.

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	Issues Raised	Initial Officer Comments
146	<p>Essex County Council commented that the relevant text should be amended to read as follows and included as a paragraph in the Concept Statement of each proposed site allocation,</p> <p><i>“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. This could be incorporated into the greenspace provided on-site. 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.”</i></p>	
147	<p>Essex County Council commented that the Concept Statements for most proposed development sites include reference to green buffers, site boundary treatment, tree/hedge planting or habitat mitigation. For clarity and to make a positive contribution to local ecology the concept statement for each site should use, or adapt, as appropriate the statement in paragraph 5.58 which states: “landscaped green buffers should be provided in the form of publicly accessible green space, with conditions attached to ensure that it has ecological value”.</p>	<p>The requirement to include green buffers, site boundary treatment, tree/hedge planting or habitat mitigation has been considered on a site-by-site basis, and included within the policies as appropriate. Publicly accessible green space may not necessarily be provided as a green buffer, and as such the proposed amendment is not considered to be appropriate. However, an amendment stating that the publicly accessible green space will have “conditions attached to ensure that it has ecological value” would be appropriate for inclusion within the Concept Statements.</p>

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	Issues Raised	Initial Officer Comments
148	Essex County Council commented that the Concept Statements provide limited evaluation of the sites and their infrastructure requirements. Masterplans/design briefs could be required prior to the submission of a planning application for all sites of a certain size or sensitivity setting out the vision for future development with design codes for larger sites where development will be phased (as supported by Paragraph 59 of the NPPF). A landscape strategy promoting green links and biodiversity corridors for each site should also be required.	<p>The Concept Statements are intended to provide a guide to development of the sites, rather than provide prescriptive design requirements. It would be unreasonable to require the submission of a masterplan/design brief prior to the submission of a planning application, although such an approach would be supported and is expected to occur in the case of the development of many of the allocated sites.</p> <p>A requirement for applications to develop the site to be accompanied by a landscape strategy promoting green links and biodiversity corridors can be added to each Concept Statement, as appropriate.</p>
149	Essex County Council commented that simple diagrams illustrating the principles/objectives referred to in the text would add clarity, particularly where connections are required between different sites or parts of a site that may be developed at different stages or post 2021, for example, between the land allocations for employment South of Great Wakering (NEL3), Star Lane Industrial Estate Great Wakering (BFR1) and land south of the High St (SER9b).	The Concept Statements are intended to provide a guide to development of the sites, rather than provide prescriptive design requirements.
Policy NEL1		
150	Chelmsford City Council commented that if all the development (residential, employment and a Gypsy and Traveller site) is promoted in the area west of Rayleigh/ south east of Rawreth, the cumulative impact on Battlesbridge would need to be carefully considered. Officers would not want to see any adverse impacts on this existing community.	Noted.

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	Issues Raised	Initial Officer Comments
151	Environment Agency support the Concept Statement acknowledging SUDs need to be provided and a drainage strategy submitted; that capacity in the foul water network will need modelling at the planning application stage due to downstream sewer flooding events; and that any habitat loss associated with the exiting ponds on site and watercourse will need to be mitigated against.	Support noted.
152	Essex County Council commented that this site has the potential to support European Protected Species.	Noted. There is currently no evidence to suggest that the site supports any European Protected Species. Further investigation and any necessary mitigation will be required at the planning application stage. It is also relevant to note that the proposed allocations have been subject to a Habitats Regulation Assessment which has identified no significant effects on European Sites.
153	Essex County Council commented that this site lies within an area characterised by historic dispersed settlement retaining good potential for below ground deposits (Historic Environment Character Zone 34). Any future development would require a programme of archaeological evaluation to ensure that the historic environment potential of the area is taken into account at an early stage.	Noted.
Policy NEL2		
154	Basildon Borough Council supports the principle of allocating land at NEL2 for employment development noting the advantage this location has to other alternatives in terms of the proximity to the strategic highway network.	Support noted.

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	Issues Raised	Initial Officer Comments
155	Basildon Borough Council object to the wording in Paragraph 5.27 and Policy NEL2 and Concept Statement that suggests access to the proposed NEL2 could be possible from the field to the west of the site. Notwithstanding the fact that this access would cross over land in the Basildon Borough and therefore is outside of Rochford's control to implement, this would result in access to the site being directly onto the A127, in the vicinity of a strategic junction, which would compromise the safety of the site's occupants, as well as other road users.	The proposed amendment can be made to paragraph 5.27.
156	Basildon Borough Council suggest that "...and onto the A127 from the field to the west of the site." should be removed.	
157	Castle Point Borough Council commented that the potential impacts on the strategic highway network have not been assessed to date. Without this information it is unclear whether allocations GT1 and NEL2 are suitable.	Proposed development at this location has formed part of discussions with Essex County Council. Policy NEL2 makes clear that appropriate highway access will have to be implemented prior to any development of the site for employment uses.
158	Allocations GT1 and NEL2 should be removed from the Allocations Document if evidence cannot be provided that the impacts of these allocations on the strategic highway network have been assessed, and proposals put in place to minimise such impacts to an acceptable level.	
159	Castle Point Borough Council commented that proposed allocations GT1 and NEL2 have the potential to impact on the strategic purpose of the Green Belt, and to set a precedent for similar developments elsewhere along the A130 corridor.	Comment noted, however, the site identified is constrained by the A1245, the A127, employment land and a railway line.

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	Issues Raised	Initial Officer Comments
160	In order to conform with paragraph 81 of the NPPF, opportunities should be sought to enhance the landscape and visual amenity of this site. Greater consideration to such matters could be given in the supporting text of these allocations. Impact on the openness of the Green Belt should also be minimised.	The Concept Statement requires that existing trees and hedgerows along the boundaries of the site are retained and enhanced (paragraph 5.40) and that any loss of trees should be replaced on a like-for-like basis (paragraph 5.41).
161	The outcomes of joint working to prepare a landscape strategy for the A130 corridor should inform the landscape and design requirements of these allocations.	Noted. This strategy would form part of the evidence base for the Council's plans.
162	Environment Agency support the Concept Statement acknowledging SUDs need to be provided and a drainage strategy submitted; and a contaminated land study will be required due to the previous uses of the site.	Support noted.
163	Environment Agency generally support this policy, but advise that the area is not served by a mains sewer. Private treatment options may need to be considered and permission sought. Trade effluent is often not suitable for discharge to a small package sewage treatment plant or septic tank with soakaway. Some existing businesses from Rawreth Industrial Estate could be relocated to this site, however, some of these produce trade effluents that may not be suitable for private disposal so alternative locations may have to be considered.	Noted.
164	Environment Agency would support a connection to the mains system.	Noted.

Rochford District Council – Local Development Framework Allocations Document: Consultation Statement

	Issues Raised	Initial Officer Comments
165	Environment Agency advise that Environmental Permits would need to be obtained for any proposed waste operations.	Noted.
166	Essex County Council commented that access to the proposed allocation at this location would be contrary to a number of current Highways Development Management Policies. Given the location of the site at a key strategic junction lack of design compliant access points would contribute to an increase in congestion and safety concerns. The County Council is unaware of any studies or evidence to indicate that access/egress on and off the site can be secured in a design compliant manner. In these circumstances the highway authority is unable to support allocation of the site for the proposed employment uses.	Discussions on access/egress issues for this site are taking place between specialist transport consultants and Essex County Council.
167	Essex County Council commented that this site lies within an area characterised by historic dispersed settlement retaining good potential for below ground deposits (Historic Environment Character Zone 34). Any future development would require a programme of archaeological evaluation to ensure that the historic environment potential of the area is taken into account at an early stage.	Noted.
Policy NEL3		
168	Environment Agency support the Concept Statement, which acknowledges SUDs need to be provided and a drainage strategy submitted; that capacity in the foul water network will need modelling at the planning application stage; and green buffers should be provided which have an ecological value.	Support noted.

Rochford District Council – Local Development Framework Allocations Document: Consultation Statement

	Issues Raised	Initial Officer Comments
169	Essex County Council commented that, as the Minerals Planning Authority, the NPPF requires them to define Mineral Safeguarding Areas within their Local Plans. The County Council has done this through Policy S8 (Safeguarding mineral resources and mineral reserves) in the Replacement Minerals Plan Pre-Submission Draft January 2013.	Noted. This draft has been consulted on from 17 January 2013 to 28 February 2013.
170	To ensure compatibility and consistency between the Allocations Document and the Minerals Local Plan the following text should be added to the Concept Statement for this site: 'The site is within a Minerals Safeguarding Area and therefore consultation on the proposed development of the site with Essex County Council is required'.	The proposed amendment can be included within the Concept Statement to ensure that this requirement is considered in the determination of planning applications.
171	Essex County Council commented that this policy should require that the Management Plans for the Local Wildlife Site should be prepared and taken into account, as appropriate, during design and construction phases and its disturbance should be avoided.	Comment noted. The Concept Statement can be amended to include reference to the management plan for the Local Wildlife Site prepared as part of Policy SER9b and that this should be taken into consideration during the design and construction phases and its disturbance should be avoided.

Rochford District Council – Local Development Framework Allocations Document: Consultation Statement

	Issues Raised	Initial Officer Comments
172	Essex County Council commented that although the proposed development area has been subject to some quarrying, there is still potential that some archaeological features remain in situ. The Essex Historic Environment Record (EHER) lists a number of archaeological sites in the vicinity: cropmarks of a linear feature and a rectangular enclosure (EHER 11157) and find spots including a Bronze Age vessel (EHER 11085). A programme of archaeological evaluation would be required to ensure that the cultural heritage is taken into account at an early stage and to make sure that opportunities for pro-active assessment, management and enhancement are fully considered.	Noted.
Policy NEL4		
173	Essex County Council commented that, as the Minerals Planning Authority, the NPPF requires them to define Mineral Safeguarding Areas within their Local Plans. The County Council has done this through Policy S8 (Safeguarding mineral resources and mineral reserves) in the Replacement Minerals Plan Pre-Submission Draft January 2013.	Noted. This draft has been consulted on from 17 January 2013 to 28 February 2013.
174	To ensure compatibility and consistency between the Allocations Document and the Minerals Local Plan the following text should be added to the Concept Statement for this site: 'The site is within a Minerals Safeguarding Area and therefore consultation on the proposed development of the site with Essex County Council is required'.	The Allocations Document does not set detailed policies for land to the north of the airport. This will be considered as part of the emerging London Southend Airport and Environs Joint Area Action Plan.

Rochford District Council – Local Development Framework Allocations Document: Consultation Statement

	Issues Raised	Initial Officer Comments
175	<p>Essex County Council commented that this area has a large amount of historic environment assets recorded on the Essex Historic Environment Record (EHER). Excavations to the east of Cherry Orchard Farmhouse identified the remains of a medieval or post medieval kiln (EHER 9744) during salvage excavations on the birckearth quarry. This kiln is clearly a precursor of the later Cherry Orchard Brickworks which continued production in to the early 21st century. The brickworks has now been demolished although there is potential for surviving deposits relating to the industry surviving beneath the ground. Cherry Orchard Farmhouse is a listed 17th century timber framed farmhouse which is nationally designated as a grade II listed building. Archaeological evaluation at Westbarrow Hall Farm (EHER17441) has recorded extensive multi-period archaeological deposits over a wide area. A number of military monuments relating to the defence of Southend Airport during World War II survive (including two examples of rare cantilever pillboxes). Detailed discussion will be required to produce a development proposal which protects the most significant deposits and provides for a mitigation strategy including excavation for any remains that cannot be preserved.</p>	<p>Comment noted, however, this will be considered as part of the emerging London Southend Airport and Environs Joint Area Action Plan.</p>
Policy ELA1		
176	<p>Natural England support the inclusion of this policy.</p>	<p>Support noted.</p>

Rochford District Council – Local Development Framework Allocations Document: Consultation Statement

	Issues Raised	Initial Officer Comments
177	Essex County Council commented that this policy should require completion of the Management Plans that will be drawn up for Local Wildlife Sites and that they be taken into account, as appropriate, during design and construction phases and that their disturbance is avoided.	Amendments will be made to the Concept Statements, as appropriate.
Policy ELA2		
178	Natural England supports this policy as it will contribute to the protection of the biodiversity of the coastal area.	Support noted.
Policy ELA3		
179	Natural England supports this policy as we consider that the Upper Roach Valley is a valuable site both for outdoor recreation and nature conservation.	Support noted.
Policy EDU1		
180	Environment Agency are pleased to note the school will be located outside of the flood zone.	Noted.
181	Essex County Council commented that the criteria listed in paragraph 7.5 are not exhaustive and omit some of the most key characteristics. Accordingly, the text of the paragraph should be deleted and replaced by cross reference to the full list provided in the Developers' Guide Education Supplement (Appendix D).	Paragraph 7.5 should be amended to include reference to Appendix D of the Education Contribution Guidelines Supplement. The characteristics identified can provide an example of important characteristics for the siting of a school.

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	Issues Raised	Initial Officer Comments
Policy EDU2		
182	Environment Agency are pleased to note the school will be located outside of the flood zone.	Noted.
183	Essex County Council commented that the criteria listed in paragraph 7.9 are not exhaustive and omit some of the most key characteristics. Accordingly, the text of each paragraph should be deleted and replaced by cross reference to the full list provided in the Developers' Guide Education Supplement (Appendix D).	Paragraph 7.9 should be amended to include reference to Appendix D of the Education Contribution Guidelines Supplement. The characteristics identified can provide an example of important characteristics for the siting of a school.
Policy EDU3		
184	Essex County Council commented that, as the Minerals Planning Authority, the NPPF requires them to define Mineral Safeguarding Areas within their Local Plans. The County Council has done this through Policy S8 (Safeguarding mineral resources and mineral reserves) in the Replacement Minerals Plan Pre-Submission Draft January 2013.	Noted. This draft has been consulted on from 17 January 2013 to 28 February 2013.
185	To ensure compatibility and consistency between the Allocations Document and the Minerals Local Plan the following text should be added to the Concept Statement for this site: 'The site is within a Minerals Safeguarding Area and therefore consultation on the proposed development of the site with Essex County Council is required'.	The proposed amendment can be included within the Concept Statement to ensure that this requirement is considered in the determination of planning applications.

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	Issues Raised	Initial Officer Comments
186	Essex County Council commented that for ease of reference Figure 27 (page 104) should also show the land south of Bray's Lane that has been secured by King Edmund for a new bus/car park.	The Allocation for Policy SER5 includes the requirement for such facilities to be provided. It is considered, given that the access has yet to be developed, unnecessarily restrictive to allocate a specific allocation for this use within the broader allocation.
Policy EDU4		
187	As Local Education Authority, Essex County Council welcomes acknowledgement in paragraph 7.15 that schools change and expand over time in order to meet local need. However, the proposals in paragraph 7.15 are potentially confusing and unduly restrictive because in most cases school expansion and/or re-modelling will extend beyond the existing built footprint on school sites. Retaining Green Belt status for school playing fields in their entirety would not offer sufficient flexibility to attain the policy intent due to some school expansion proposals necessarily straddling the Green Belt boundary.	It should be noted that the Allocations Document does not propose to draw the Green Belt boundary tightly around the footprint of schools. Instead, it removes school and a curtilage area from the Green Belt; but leaves playing pitches allocated as Green Belt. It is recommended that, for clarity; text at paragraph 7.15 is amended to state that schools buildings and their curtilages are removed from the Green Belt.
Policy OSL1		
188	Environment Agency support the inclusion of this policy which protects existing open space.	Support noted.
Policy OSL2		
189	Environment Agency support the promotion of new open space which will hopefully be designed and maintained to ensure it has multiple environmental benefits.	Support noted.

Rochford District Council – Local Development Framework Allocations Document: Consultation Statement

	Issues Raised	Initial Officer Comments
Implementation, Delivery and Monitoring		
190	English Heritage commented that this section does not refer to any risks associated with sites that contain heritage assets, or below ground archaeology. The plan should seek opportunities for positive enhancement of the historic environment in appropriate circumstances, perhaps in the form of compensatory gains.	The overarching approach to the historic environment is contained within Core Strategy Policy ENV1. The Implementation, Delivery and Monitoring chapter of the Core Strategy (page 146) states that sites of historical and archaeological interest will be protected through the development management process. Further detail on the requirement to consider the historic environment in planning proposals will be contained in the emerging Development Management Document.
Characteristics Map		
191	Environment Agency are pleased that figure 45 identifies the flood zones and national/ international designations in the District.	Noted.

FAO: Mr Sam Hollingworth
Rochford District Council
Planning Department
South Street
Rochford
Essex
SS4 1BW

Our ref: AE/2006/000317/OT-04/SB1-L01
Your ref: *
Date: 27 March 2013

Dear Mr Hollingworth

Rochford Site Allocations DPD: Pre-submission comments on Wastewater Treatment Works

We raised an unsound representation to sites BRF1 and SER9 in your pre-submission consultation of the Rochford Site Allocations DPD due to the uncertainty about the current and future capacity at Southend Wastewater Treatment Works (WwTWs).

We have since met with Anglian Water at Southend Borough Councils offices on 1 February 2013. Following this meeting we received flow data from Anglian Water for Southend WwTW which confirmed that there is capacity at Southend WwTW to accept the growth proposed by both Southend Borough Council and Rochford District Council.

We can therefore confirm that we withdraw our unsound representation to your Site Allocations DPD. Can you please liaise with the inspector to confirm we have resolved these issues. If we need to provide any further information then we would be happy to do so.

Yours sincerely

Mrs Jo Firth
Senior Planning Liaison Officer

Direct dial: 01473 706016
Direct e-mail: jo.firth@environment-agency.gov.uk

Environment Agency
Cobham Road, Ipswich, Suffolk, IP3 9JD.
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www.environment-agency.gov.uk
End

Appendix 4 – Issues Raised during Pre-Submission Consultation

Issues Raised	Initial Officer Comments
Introduction	
There is no evidence of a cumulative traffic assessment for the District to support the Core Strategy or the Allocations Document.	<p>The Council has considered highway infrastructure throughout the preparation of the Core Strategy and the Allocations Document. The Core Strategy (Appendix H1 in particular) identifies where improvements to the highway network would be required to accompany residential development in Policies H2 and H3. This was scrutinised during the Core Strategy examination.</p> <p>Essex County Council as the highways authority have been closely consulted throughout the process of the Core Strategy and the Allocations DPD and as such have considered the cumulative, and individual, impact of the developments across the District on the highway network. The consideration of potential sites has included views from the Highways Authority. This was done on an individual location basis and on a cumulative basis which assessed the impact of the cumulative development.</p>
The Highways Authority has not looked strategically at the cumulative effect of traffic impacts on the Rochford Core Strategy through the Local Transport Plan.	<p>The Council was consulted during the preparation of the Local Transport Plan.</p> <p>In addition, discussions have taken place with Essex County Council Highways to inform the development of the policies in the Allocations Document¹. Furthermore a Transport Supplementary Planning Document is being produced which will provide further detail on transport and highway issues.</p>

¹ Notes of Meeting with Highway and Public Transport Representatives at Essex County Council (22 February 2012), available from: http://www.rochford.gov.uk/sites/rochford.gov.uk/files/documents/files/planning_evi_base_highwaymeetingfeb.pdf. Rochford District Transportation and Highway Meeting (30 August 2012), available from: http://www.rochford.gov.uk/sites/rochford.gov.uk/files/documents/files/planning_evi_base_highwaymeetingaug.pdf

Rochford District Council – Local Development Framework Allocations Document: Consultation Statement

Issues Raised	Initial Officer Comments
<p>The evidence base for the document, such as the call for sites, is outdated, and it is unclear whether decisions have been made using current information. Wider changes such as the economy have not been accounted for. This should be identified in the plan.</p>	<p>The Allocations Document has been prepared using the most up-to-date information where available, for example the Surface Water Management Plan. The Allocations Document has also been informed by the Strategic Housing Land Availability Assessment, in particular the 2012 Review.</p>
<p>The Plan/Sustainability Appraisal Non-Technical summary does not have a section on the impact on individual sites on the District as a whole.</p>	<p>This has been considered throughout the preparation of the Plan. As an example, the potential impact of development at BFR1, NEL3 and SER9 has been highlighted and included in the Plan to ensure that these proposed developments are taken into consideration together at the planning application stage, so for example development of BFR1 does not hinder the development of SER9b.</p> <p>A summary of the cumulative effects identified throughout the appraisal of the proposed policies within the Plan has been included in the main Sustainability Appraisal report. Further detail is provided within the appraisal of the options.</p>
<p>The impact of neighbouring authorities plans have not been taken into consideration.</p>	<p>The Council has been mindful of neighbouring authorities housing and employment requirements throughout the production of the Core Strategy and the Allocations Document due to the presence of the Regional Spatial Strategy (the East of England Plan) which set targets for the east of England region. This Plan was revoked on 3 January 2013.</p> <p>The Council has engaged with neighbouring local authorities on their plans, where possible, although it should be noted that few local authorities in Essex have an adopted Core Strategy.</p> <p>Neighbouring local authorities have been formally consulted during the Discussion and Consultation and Submission stages of the Allocations Document, as well as throughout the Core Strategy.</p>
<p>The Transport Supplementary Planning Document should be prepared</p>	<p>This emerging document is being prepared in consultation with Essex</p>

Rochford District Council – Local Development Framework Allocations Document: Consultation Statement

Issues Raised	Initial Officer Comments
and consulted upon, and incorporated into the development of the Allocations Document.	County Council and Parish/Town Councils.
The sites chosen, the high infrastructure costs and the unrealistic programme described is not achievable. The Plan does not conform to the Core Strategy in terms of housing delivery.	Both the Core Strategy and the Allocations Document have inbuilt flexibility to ensure the delivery of a five year housing supply.
The site for Canewdon does not accord with the Core Strategy Key Diagram, as it is located to the west of Canewdon rather than to the south. This allocation should be reconsidered.	The proposed site for Canewdon accords with the Key Diagram.
Decision-making for Canewdon has been inconsistent. Sites to the east of Canewdon that are no more south than the proposed allocation were dismissed in part for not being to the south of Canewdon.	The proposed site for Canewdon accords with the Key Diagram.
Although the consultation was extended to 8 weeks, it has not been well publicised and has been less engaging than the consultation in 2010 which included public meetings attended by officers. The local community has not been adequately consulted.	<p>The initial consultation in 2010 sought to engage with residents and raise awareness of the document and generate discussions on the options for housing, employment and other land uses presented in the Discussion and Consultation Document.</p> <p>This latter pre-submission consultation stage sought views on the 'soundness' and legal compliance of the document, as opposed to options.</p>
How was the previous document consulted upon and what were the communities comments on this document?	The consultation methods of the Discussion and Consultation Document are set out in Table 1 of this Consultation Statement. A summary of the issues raised during the consultation, and officers responses to these can be found in Appendix 2.
It is unclear how the outcomes of the public meetings in 2010 have been taken into account.	The public meetings attended by officers in 2010 sought to maximise public awareness of the consultation and explain the purpose and content of the Discussion and Consultation Document.

Rochford District Council – Local Development Framework Allocations Document: Consultation Statement

Issues Raised	Initial Officer Comments
<p>The local community wish to protect the setting of the church in Canewdon, and voted in favour of the then option SC1 to the south of Anchor Lane and specifically voted against development in the location that is now being proposed.</p>	<p>Whilst it is noted that there was some support for Option SC1 in the Discussion and Consultation Document during the 2010 consultation, the consultation results did not indicate a strong preference for a particular option, as identified in the summary of issues raised (Appendix 2).</p>
<p>Land at Poyntens Road in Rayleigh can be delivered during the plan period for residential development. It should be included in the Allocations Document.</p> <p>The exclusion of this site from the Allocations Document is not based on a robust and credible evidence base. The Council has failed to consider a suitable site for residential development, and has not given a robust response as to why the site has been discounted from the Allocations Document and the SHLAA 2012 Review. The SHLAA should include sites which are not suitable for development, to illustrate that all sites have been assessed appropriately.</p>	<p>This site is located to the south west of Rayleigh, and its allocation would not accord with the general locations identified in the adopted Core Strategy (Policy H2 and H3, and the Key Diagram).</p> <p>This site is located to the south west of Rayleigh, and its allocation would not accord with the general locations identified in the adopted Core Strategy (Policy H2 and H3, and the Key Diagram). It has therefore not been included in the Allocations Document or the Strategic Housing Land Availability Assessment (SHLAA) 2012 Review.</p>
<p>The Council should demonstrate evidence of community involvement and that the choices made are supported by facts.</p>	<p>This document sets out how the community has been involved. The allocations proposed within the Plan are based on a wide range of evidence.</p>
<p>The Allocations Document should be consistent with the NPPF e.g. paragraph 47 relating to meeting housing need and supply, and the 5% and 20% buffers.</p>	<p>The Core Strategy and Allocations Document have built-in flexibility to enable sites identified later on in the plan period to be brought forward earlier in order to ensure that there is a rolling five year supply of housing land. In addition the proposed sites for allocation have a 5% flexibility to compensate for any shortfall in supply.</p>
<p>The Council has continually failed to meet the housing target set by the RSS, and carried forward in the Core Strategy, of 250 dwellings per year. Sufficient and suitable sites must be allocated in order to overcome this deficit. Some housing sites may not come forward as expected, therefore additional and suitable sites, such as land at Poyntens Road, should be</p>	<p>Flexibility has been integrated into the sites identified in the Allocations Document to address potential shortfalls during the plan period. Housing supply will be monitored through the Annual Monitoring Report.</p>

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Issues Raised	Initial Officer Comments
allocated for flexibility.	
Green Belt release is required to meet housing delivery targets, but there is no sound reason why this site has been excluded. Other less suitable Green Belt sites have been included in the Allocations Document e.g. SER1 and SER4 (flood zone 2 and 3) and SER9 (adjacent to a Local Wildlife Site). Land at Poyntens Road is more appropriate.	<p>This site is located to the south west of Rayleigh, and its allocation would not accord with the general locations identified in the adopted Core Strategy (Policy H2 and H3, and the Key Diagram).</p> <p>Flood risk areas and the proximity of sites to areas of ecological interest have been addressed within the Concept Statement. These sites accord with the Core Strategy general locations.</p>
The site can accommodate 60 dwellings rather than the 35 proposed by the Council.	It is unclear where this figure has been derived from as the site in question was not included in the 2009 SHLAA or the 2012 Review.
Brownfield Residential Land Allocations	
Not all of the existing employment sites are appropriate for redevelopment for alternative uses. In some cases, the proposed site is in a less sustainable location and would not satisfy the locational requirements of the NPPF. Greater consideration should be given to the suitability of some sites for 'mixed use' developments.	The strategic approach to the reallocation of employment land was explored through the Core Strategy and scrutinised during the examination.
The Council may not be able to identify a five year supply of deliverable housing sites that accord with the NPPF and recent appeal decisions.	<p>Both the Annual Monitoring Report and the SHLAA 2012 Review demonstrate that the Council has a five year supply of land for housing.</p> <p>In addition, the Core Strategy also stated that the Council will maintain a flexible approach with regards to the timing of the release of land for residential development to ensure a constant five-year supply of land. Therefore, the Council should be able to respond to any changes in land supply promptly with such an approach.</p>
The housing provision targets contained within the Core Strategy, and by extension within the housing land supply numbers, do not meet the	The Core Strategy housing figures were based on the, objectively assessed, targets set out in the East of England Plan (2008) which was revoked on 3

Rochford District Council – Local Development Framework Allocations Document: Consultation Statement

Issues Raised	Initial Officer Comments
<p>requirement of the NPPF to meet the 'full objectively assessed needs for market and affordable housing' (paragraph 47).</p>	<p>January 2013. Affordable housing requirements were objectively assessed within the 2008 Strategic Housing Market Assessment, but the 2010 Affordable Housing Viability Study found that a maximum of 35% affordable housing would be appropriate, unless demonstrated to be unviable.</p>
<p>Housing supply is likely to be constrained on a number of sites, particularly BFR3, SER2 and SER9b.</p> <p>The findings of the Essex Planning Officers Association (EPOA) within their assessment of the Greater Essex Demographic Forecasts in March 2012 provide further evidence of the anticipated population growth within Essex. They confirm that the sub-national population projections (SNPP), Migration-led and Economic scenarios identified the need for significantly higher annual housing provision figures than those which the adopted Core Strategy currently allows for.</p> <p>We are currently preparing an objective assessment of housing needs for Rochford and surrounding local planning authority areas with a view to addressing the housing needs of the contiguous market area in the period to 2031.</p> <p>Land to the south of Stambridge Road is suitable and available for residential development.</p>	<p>Potential constraints to development have been considered during the development of the Plan.</p> <p>Rochford District is part of the Thames Gateway housing market area alongside Basildon Borough, Castle Point Borough, Southend Borough and Thurrock. Together, the Councils have commissioned the preparation of a Strategic Housing Market Assessment for the Thames Gateway area which will be used to inform a review of the Core Strategy.</p>
<p>Concerns regarding the deliverability of identified employment sites were raised during the Core Strategy examination, but the Inspector concluded that the Core Strategy had sufficient flexibility to accommodate a shortfall in delivery, both because there was flexibility in the timing of the release of the strategic growth locations set out in CS Policies H2 and H3, and flexibility in terms of the quantum of development that could be delivered at the broad locations. There are still concerns regarding the deliverability of the site, but the Plan seeks to remove the flexibility from the broad</p>	<p>The Allocations Document provides flexibility in both terms of timing and quantum of development, in accordance with the Core Strategy. The Allocations Document seeks to minimise impact on the Green Belt, and to prioritise the development of previously developed land; again in accordance with the Core Strategy.</p>

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Issues Raised	Initial Officer Comments
locations, by introducing ineffective and arbitrary limitations on the growth locations, in conflict with the Core Strategy and the basis upon which it was found sound.	
Policy BFR1	
There is inadequate infrastructure (schools, shops, water supply, waste water, gas, electricity, doctor's surgeries and roads) to cope increased demand.	The Council has prepared the Core Strategy and subsequently the Allocations Document in consultation with numerous infrastructure providers, including Essex County Council (highways, education, and public transport departments), Anglian Water, Environment Agency and the South East Essex Primary Care Trust.
Narrow roads, pavements and parking are an issue, for example along the High Street.	Noted. The proposed development of Star Lane Industrial Estate would not connect directly onto the High Street. Although it is acknowledged that residents may use private transport, walking and cycling within the village will be encouraged, for example through the provision of Travel Plans at the planning application stage.
Concern regarding increased crime, anti-social behaviour and over population.	The Sustainable Community Strategy for Rochford District was produced by the Local Strategic Partnership (a partnership of key public, private and voluntary sector organisations) and gives all organisations a clear focus on what the priorities are in the District. These priorities include supporting the District's fostering greater community cohesion. The Sustainable Community Strategy notes there is a perception of anti-social behaviour and a fear of crime and disorder, a perception that the Local Strategic Partnership and its partners will help to address through greater community engagement and supporting community projects.
Although the document proposes to encourage walking and cycling, this is unlikely to happen and would exacerbate traffic problems.	The site is located in proximity to the centre of the village. Walking and cycling within the village will be encouraged, for example through the provision of Travel Plans at the planning application stage. In addition, public transport infrastructure improvements and service enhancements are

Rochford District Council – Local Development Framework Allocations Document: Consultation Statement

Issues Raised	Initial Officer Comments
	required to accompany development of this site.
Concern regarding loss of village's identity.	The design and character of the proposed development would be addressed in detail at the planning application stage. Proposals would be considered against the emerging Development Management policies.
Flood risk, due to poorly maintained sea defences, is an issue but nothing is proposed to address this.	<p>The areas identified in the Plan to the west of Great Wakering (BFR1, SER9a and SER9b) are not located within an area at risk of flooding.</p> <p>Flood defences are the responsibility of the Environment Agency. The Shoreline Management Plan forms part of the evidence base for the Council's development plans.</p>
The Sports Centre closed about 18 months ago and may not open again.	Noted, however, this is not a planning issue.
A community centre is unlikely to be sustained.	The Core Strategy and Allocations Document do not specify the types of community facilities that should be provided.
Existing buildings should be utilised and invested in instead rather than building new homes.	The Thames Gateway South Essex Housing Group re-launched its Empty Homes Initiative on 28 November 2012. The group is working with private owners to renovate empty properties in the sub region and make them available to people in housing need over the next two years.
The road/track to the south of the industrial estate (in Green Belt) runs eastwards from Star Lane. It provides access/egress to the Local Wildlife Site and is only used infrequently by fishermen and has a padlocked gate for security.	Noted. The Concept Statement at paragraph 3.276 recognises that development proposals in this location (specifically SER9b, BFR1 and NEL3) would need to be comprehensively planned, and as such one access/egress point serving the sites should be carefully considered. This would be considered in detail at the planning application stage.
Access should not go through the wildlife site as stated in Policy SER9b.	The Concept Statement for this policy states that access/egress for the sites identified in Policy BFR1, SER9b and NEL3 should not go through the Local

Rochford District Council – Local Development Framework Allocations Document: Consultation Statement

Issues Raised	Initial Officer Comments
	Wildlife Site (paragraph 3.276).
<p>The following needs to be considered:</p> <ul style="list-style-type: none"> • access from the road/track to BFR1 and SER9b must be within 50 metres after the junction with Star Lane to minimise disruption of the local wildlife site • visibility splays may possibly be created on land in BFR1 • impact on road structure in BFR1 of traffic to/from SER9b • impact on dwellings of industrial traffic (NEL3) using one access/egress 	Access/egress arrangements would be considered in detail at the planning application stage.
<p>The Concept Statement is overly prescriptive as it includes quantitative requirements for affordable housing, Lifetime Homes, public open space and play space which are unreasonable. The level of provision will be dependent upon scheme viability and other site-specific factors, and the policy should acknowledge this. It should set out reasonable aspirations, rather than prescriptive minimum requirements, for the provision of on-site open and play space.</p>	<p>The affordable housing and Lifetime Homes requirements set out in the Plan are based the dwelling proportion in the adopted Core Strategy, for example Policy H4 stipulates that 35% of dwellings on site are required to be affordable (unless demonstrated to be unviable/undeliverable) and Policy H6 states that all new housing development are required to comply with the Lifetime Homes Standard (unless this would be unviable). This would be determined in detail at the planning application stage.</p> <p>In terms of public open space and play space requirements, these are based on the recommendations within the Open Space Study having regard to dwelling provision. The exact detailed design of the development would be agreed at the planning application stage.</p>
<p>The northern section of the site may not be deliverable within the expected timeframe.</p>	<p>Delivery of sites proposed in the Allocations Document will be monitored through the Annual Monitoring Report.</p>
<p>If the Industrial Estate does not come forward, the dwellings could be accommodated on land at NEL3. In any case, land identified within NEL3 is deliverable for housing or employment land.</p>	<p>As set out in the Plan, land identified in NEL3 is proposed to be allocated for employment land.</p>

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Issues Raised	Initial Officer Comments
Planning permission is being sought for the southern section (former brickworks). It should not be granted, unless the approved scheme includes appropriate vehicular access to serve site SER9b.	It is noted that a planning application is currently under consideration for this part of the site (Ref: 12/00252/FUL). The Plan requires the site to enable access to SER9b.
This proposal creates uncertainties for the businesses on the Industrial Estate. The northern section should not be reallocated.	Compensatory employment land is proposed to be allocated within NEL3.
It is likely that the relocation of the industrial estate would be in a less sustainable location than at present. Increasing housing provision in the village without increasing employment opportunities will increase out-commuting and car usage. The site should be redeveloped for a 'mixed-use' scheme rather than just residential.	The proposed allocation at NEL3 accords with Core Strategy Policy ED4.
Consideration should be given to the effects of the proposal for the brickworks site on the adjacent Local Wildlife Site; the desirability of improving public access to the Local Wildlife Site as part of the need to enhance publicly accessible greenspace provision within Great Wakering; and the cumulative effects of development proposals on existing infrastructure and facilities will be given due regard in the plan making process.	<p>The Plan has considered the potential impact of development at this site on the adjacent Local Wildlife Site. It has also considered the potential impact from SER9b and NEL3 and has incorporated mitigation measures, as appropriate.</p> <p>A green buffer along the eastern boundary of the site is required to minimise disturbance from the proposed development on the Local Wildlife Site.</p> <p>In addition, a management plan for the Local Wildlife Site is required.</p>
Policy BFR2	
More parking needs to be provided, especially for a retail unit of the size indicated.	The proposals for the centre of Hockley are contained in the Hockley Area Action Plan Submission Document.
There is traffic congestion at peak times, which will be exacerbated by new development.	The proposals for the centre of Hockley are contained in the Hockley Area Action Plan Submission Document.
Traffic solutions should be viable. Slip lanes on the B1013 will have a	The proposals for the centre of Hockley are contained in the Hockley Area

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negative impact on Spa Road which will serve the proposed development. A raised area for pedestrians will increase traffic congestion. Spa Road is not wide enough for widened pavements and extra slip lanes.	Action Plan Submission Document.
An 'evening economy' is likely to cause anti-social behaviour problems similar to Rayleigh. This would need policing.	The Sustainable Community Strategy for Rochford District was produced by the Local Strategic Partnership (a partnership of key public, private and voluntary sector organisations) and gives all organisations a clear focus on what the priorities are in the District. These priorities include supporting the District's fostering greater community cohesion. The Sustainable Community Strategy notes there is a perception of anti-social behaviour and a fear of crime and disorder, a perception that the Local Strategic Partnership and its partners will help to address through greater community engagement and supporting community projects.
Adequate affordable housing should be provided.	35% of dwellings delivered through the redevelopment of the centre of Hockley will be required to be affordable, unless it can be demonstrated this this would render the development unviable, as per the Core Strategy (Policy H4).
The policy acknowledges a shortfall of housing provision of at least 50 units. The alternative sites suggested in the Hockley Area Action Plan hypothetical capacity test are not a practical option due to restricted dimensions and close proximity to the railway line. No realistic allowance has been made for this shortfall in the town centre or by increasing flexibility elsewhere in the district. The document does not demonstrate that the Council can meet its target for housing supply. The document should have increased flexibility in terms of housing numbers.	<p>The emerging Hockley Area Action Plan has identified the number of dwellings to be provided within the centre of Hockley.</p> <p>The SHLAA identifies alternative brownfield land within Hockley, which have the potential to meet dwelling requirements. Windfall sites can also meet this need.</p> <p>The Council has identified the minimum amount of Green Belt required to meeting dwelling requirements.</p> <p>Outline planning permission has been granted for the development of 50 dwellings on the brownfield land identified in Policy SER3 (Ref:</p>

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	12/00283/OUT).
The village does not need a large supermarket.	The proposals for the centre of Hockley are contained in the Hockley Area Action Plan Submission Document.
There are too many houses proposed.	The proposals for the centre of Hockley are contained in the Hockley Area Action Plan Submission Document.
Hockley is a village, not a town.	Hockley is designated a town in the 2006 Replacement Local Plan.
If housing is needed it should go on Eldon Way.	The proposals for the centre of Hockley are contained in the Hockley Area Action Plan Submission Document.
<p>Royal Mail support the inclusion of Eldon Way/Foundry Industrial Estate within the policy for a mixed-use redevelopment. However, they currently have no plans to close or relocate the Delivery Office and the Plan should recognise that the Delivery Office will need to be relocated/re-provided prior to the site's redevelopment in order to ensure that Royal Mail's operations are not prejudiced.</p> <p>It is suggested that the following text is added to accompany Policy BFR2: 'The redevelopment of some sites will be dependent on private land owners and developers bringing their land forward. In relation to Royal Mail's site, redevelopment of the site will require the relocation of the Delivery Office prior to its redevelopment.' And 'Any new development within the Opportunity Site will need to ensure that it is designed to be cognisant and sensitive to existing land uses. This may be particularly important in relation to Royal Mail's Delivery Office'.</p>	Noted. The proposals for the centre of Hockley are contained in the Hockley Area Action Plan Submission Document.
This site has good access to the road network and the train station, and presents an opportunity for a mixed use redevelopment appropriate to a town centre location.	Noted. The proposals for the centre of Hockley are contained in the Hockley Area Action Plan Submission Document.

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Policy BFR3	
<p>The Concept Statement is overly prescriptive as it includes quantitative requirements for affordable housing, Lifetime Homes, public open space and play space which are unreasonable. The level of provision will be dependent upon overall scheme viability, and the policy should acknowledge this. It should set out reasonable aspirations, rather than prescriptive minimum requirements, for the provision of on-site open and play space.</p>	<p>The affordable housing and Lifetime Homes requirements set out in the Plan are based the dwelling proportion in the adopted Core Strategy, for example Policy H4 stipulates that 35% of dwellings on site are required to be affordable (unless demonstrated to be unviable/undeliverable) and Policy H6 states that all new housing development are required to comply with the Lifetime Homes Standard (unless this would be unviable). This would be determined in detail at the planning application stage.</p> <p>In terms of public open space and play space requirements, these are based on the recommendations within the Open Space Study having regard to dwelling provision. The exact detailed design of the development would be agreed at the planning application stage.</p>
<p>If reallocated from employment use to residential, this isolated site would be difficult to create a defensible Green Belt boundary. It would also put a more vulnerable use within an area of Flood Zone 2 and 3. The site should be safeguarded for employment use.</p>	<p>As noted by the Environment Agency in their response to the pre-submission consultation (Comment 33 of specific and general consultation body comments), the Sequential Test for this site has been passed.</p>
<p>The provision of children's play facilities alongside the identified constraints (including but not limited to highways/access infrastructure, flood mitigation measures and affordable housing), means that the overall quantum of dwellings that may be deliverable on site is likely to fall considerably below that originally anticipated in the adopted Core Strategy. These factors cast doubt over the deliverability of the proposed scheme, both in terms of the number of dwellings capable of being accommodated at the site and in terms of the timing of their provision, and re-affirm the need to ensure that the development of Stambridge Mills is comprehensively planned in accordance with the proposed development of land South of Stambridge Road.</p>	<p>A planning application for this site is currently under consideration by the Council (Ref: 11/00494/FUL).</p> <p>The most recent housing trajectory is set out in the SHLAA 2012 Review.</p>

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Policy BFR4	
As the site has been identified in the Core Strategy, it has been included in the Allocations Submission Document, but this does not make the site deliverable. The plan does not include detail on site delivery or timescale.	Site delivery has been assessed and expected timescale has been included within the SHLAA.
Paragraphs 2.82, 2.88, 2.94, 2.106, and 2.113 provide evidence as to why this site is unlikely to be delivered, and there is a lack of evidence that the site is deliverable during the plan period.	<p>The Plan notes that given the uses on site, decontamination may need to take place prior to development (paragraph 2.82).</p> <p>The infrastructure, services and facilities required would be considered in detail at the planning application stage in terms of impact on viability / deliverability (paragraph 2.88).</p> <p>Alternative employment land is required to compensate for the loss of employment land at Rawreth Industrial Estate (paragraph 2.94).</p> <p>In terms of highway and public transport improvements (paragraph 2.106) and financial contributions towards a new primary school (paragraph 2.113) this would likely be dependent upon when the site is delivered in terms of site SER1, and what improvements have already been implemented with the delivery of SER1.</p>
The plan should acknowledge that the site is in multiple ownership, is not being promoted for development by the landowners, and in practice the site could only come forward on a comprehensive basis with all landowners involved. Paragraph 2.82 in particular should be amended accordingly.	The Council acknowledge that the site will not come forward in the early part of the plan period (it is not included in the five-year land supply). Alternative employment land will be allocated (as proposed within NEL1 and NEL2) and the Council will work with landowners, developers, business representatives and other stakeholders to ensure this is delivered and that displaced businesses are suitably relocated.
The suggested density of up to 60 dwellings per hectare is excessive for this location. Whilst recognising that the site falls within the existing urban area, it is not within a town centre location, and the suggested density is	The SHLAA (2012) suggests that a density of between 30 and 60 dwellings per hectare would be appropriate for the site. The higher density is suggested due to the exceptional circumstances of site (i.e. the scale and

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<p>excessive given the character of the area. There is a lack of market interest in developing at this density. A density range of 30-35 dwellings per hectare (net) would be more appropriate.</p> <p>The scale of the proposed development on the site is unclear (paragraphs 2.86, 2.87, 2.91 and 2.105). The SHLAA figure for the site (222 dwellings; paragraph 2.91) may not be achievable as the open space requirements would be higher than that suggested in the plan (paragraph 2.105). 140 dwellings at 30 dwellings per hectare (paragraph 2.86) would be more appropriate if the site was delivered but this would create a shortfall of 60-70 dwellings.)</p>	<p>mass of the buildings currently occupying it).</p> <p>The precise density and open space requirements would be determined at the planning application stage. Viability would have to be carefully considered.</p>
<p>It is likely that the relocation of the industrial estate would be in a less sustainable location than at present. The site is well related to the road network and train station. The site should be redeveloped for a 'mixed-use' scheme rather than just residential.</p>	<p>The sustainability of the proposed site for employment land (NEL1) has been considered in the Sustainability Appraisal, and has also been considered in the Detailed Assessment of Potential Employment Sites (March 2012) as part of Options E13 to E16. Whilst no comparison between the existing employment site at Rawreth Industrial Estate and the proposed employment site to the south of London Road has not been undertaken, the assessments do not suggest that NEL1 would not constitute sustainable development.</p>
Settlement Extension Residential Land Allocations	
<p>The Green Belt is to be built on only in exceptional circumstances. These are not in that category. The Green Belt must remain as such.</p>	<p>The Council has demonstrated with the Core Strategy and supporting evidence that Green Belt land needs to be allocated to meet housing and employment needs through the plan period.</p>
<p>Infrastructure cannot cope with the proposed development.</p>	<p>Improvements to infrastructure required to accompany development of proposed sites are set out in Appendix H1 of the Core Strategy and within each policy.</p>
<p>Road capacity and traffic flow are not proposed to be improved.</p>	<p>Local highway capacity and infrastructure improvements are required to</p>

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	accompany proposed development.
Traffic assessments have not been undertaken for the Core Strategy or the town centre Area Action Plans, despite Essex County Council Highways stating that traffic assessments should be submitted for all strategic developments. Such assessments should be undertaken.	Traffic assessments are required to accompany strategic planning applications. Essex County Council Highways would only require area wide traffic assessments to be carried out for development plan documents if they have significant concerns about the impact on the transport network.
<p>The policies are not sufficiently flexible to deal with changing circumstances. The Council's forecast for the delivery of housing particularly in the short term is unduly optimistic. Additional land should be allocated for development due to a serious potential lack of supply. This would improve flexibility in land supply.</p> <p>Land at Lubards Lodge Farm in Rayleigh should be allocated for development in addition to those identified in the plan.</p>	<p>Flexibility has been integrated into the sites identified in the Allocations Document to address potential shortfalls during the plan period. Housing supply will be monitored through the Annual Monitoring Report. Sites identified later in the Plan period to meet need can be brought forward.</p> <p>This site is not situated in a general location identified in the adopted Core Strategy for reallocation to residential use. However, as the site has been submitted for consideration, it will be considered as part of the Core Strategy review.</p>
The statement in paragraph 3.7 is not quite correct, as although the numbers in Core Strategy Policy H3 (post 2021) were expressed as approximates, those in Policy H2 were not. For consistency with the Core Strategy, the text should be amended to reflect this.	The dwelling numbers are referred to as approximates as they are minimums.
The Core Strategy Inspector accepted the Council's land supply position only on the basis that the strategic growth locations had flexibility to accommodate shortfalls arising elsewhere. The flexibility cap of 5% (at paragraph 3.10 for the site but also elsewhere in the plan) is inadequate and inappropriate, for example the flexibility allowance would not enable land to the north of London Road to meet a shortfall in housing provision on Rawreth Industrial Estate.	The relocation of Rawreth Industrial Estate is a long term aspiration. It would be inappropriate to reallocate additional land to the north of London Road early on in the plan period, as it is likely that the industrial estate would be developed after SER1 has been implemented. The Concept Statement, however, has considered different delivery scenarios for the two sites.
Without sufficient flexibility, developments earlier in the plan period (pre-	It would be inappropriate to pre-empt shortfalls later on in the plan period

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2021) would be unable to meet housing shortfall later in the plan period (post-2021).	through enabling further development on sites earlier in the plan period. There is some flexibility for the delivery of early sites, and later sites may be brought forward in the plan period to meet any identified shortfall.
Support the plan's flexible release of land through a 'plan, monitor, and manage' approach.	Support noted.
<p>The sites identified in the plan are not the most balanced and sustainable locations; rather than large sites, smaller sites on the urban fringe should be considered.</p> <p>Land at Eastwood Nurseries, which is a medium sized site, is preferable to the west of Rayleigh (e.g. in terms of proximity to infrastructure, services and the airport, and landscape impact). The east of Rayleigh should be allocated instead.</p>	<p>The sites proposed in the Allocations Document conform to the general locations identified in the Core Strategy.</p> <p>This site is located to the east of Rayleigh, and its allocation would not accord with the general locations identified in the adopted Core Strategy (Policy H2 and H3, and the Key Diagram).</p>
The Council may not be able to identify a five year supply of deliverable housing sites that accord with the NPPF and recent appeal decisions.	<p>Both the Annual Monitoring Report and the SHLAA 2012 Review demonstrate that the Council has a five year supply of land for housing.</p> <p>In addition, the Core Strategy also stated that the Council will maintain a flexible approach with regards to the timing of the release of land for residential development to ensure a constant five-year supply of land. Therefore, the Council should be able to respond to any changes in land supply promptly with such an approach.</p>
The housing provision targets contained within the Core Strategy, and by extension within the housing land supply numbers, do not meet the requirement of the NPPF to meet the 'full objectively assessed needs for market and affordable housing' (paragraph 47).	The Core Strategy housing figures were based on the, objectively assessed, targets set out in the East of England Plan (2008) which was revoked on 3 January 2013. Affordable housing requirements were objectively assessed within the 2008 Strategic Housing Market Assessment, but the 2010 Affordable Housing Viability Study found that a maximum of 35% affordable housing would be appropriate, unless demonstrated to be unviable.

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<p>Housing supply is likely to be constrained on a number of sites, particularly BFR3, SER2 and SER9b.</p> <p>The findings of the Essex Planning Officers Association (EPOA) within their assessment of the Greater Essex Demographic Forecasts in March 2012 provide further evidence of the anticipated population growth within Essex. They confirm that the sub-national population projections (SNPP), Migration-led and Economic scenarios identified the need for significantly higher annual housing provision figures than those which the adopted Core Strategy currently allows for.</p> <p>We are currently preparing an objective assessment of housing needs for Rochford and surrounding local planning authority areas with a view to addressing the housing needs of the contiguous market area in the period to 2031.</p> <p>Land to the south of Stambridge Road is suitable and available for residential development.</p>	<p>Potential constraints to development have been considered during the development of the Plan.</p> <p>Rochford District is part of the Thames Gateway housing market area alongside Basildon Borough, Castle Point Borough, Southend Borough and Thurrock. Together, the Councils have commissioned the preparation of a Strategic Housing Market Assessment for the Thames Gateway area which will be used to inform a review of the Core Strategy.</p>
<p>With regard to paragraphs 3.4 to 3.6, given the delay between the adoption of the Core Strategy due to the legal challenge, and the progress of the Allocations Submission Document, the current housing position should be identified to keep the document as up to date as possible, and to react to any potential shortfall.</p>	<p>The SHLAA is a living document, and identifies the current housing position.</p> <p>Housing supply will be monitored within the Annual Monitoring Report.</p>
<p>Development in Hullbridge should take place in one go rather than as per the phasing identified in table 2, given the infrastructure requirements and social benefits, particularly as some facilities are required in the first phase. The additional costs of stopping and starting the development would potentially increase the costs of developing the site, which could be available for social provision if the development runs straight through.</p>	<p>The second phase of housing development proposed for Hullbridge (SER6b) is as per the Core Strategy to ensure that Green Belt land is not released unnecessarily early.</p>

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<p>It is expected that the first 250 dwellings could be delivered by mid-2019 which would mean a 2 year break if the policy were strictly adhered to. Advance infrastructure for future phases at the start would be both cost effective, and mean that the delivery rate for homes would be accelerated in the later years. The Council's approach could therefore cause a delay in the delivery of housing units, increase costs and therefore not be sustainable and potentially affect the Council's housing delivery strategy.</p>	<p>If this is the case, then development of the first phase (SER6a) should be postponed to avoid the release of Green Belt for the second phase (SER6b) unnecessarily early in terms of ensuring a five-year supply of housing land.</p>
<p>The Core Strategy Inspector accepted the Council's land supply position only on the basis that the strategic growth locations had flexibility to accommodate shortfalls arising elsewhere. Paragraph 3.10 introduces a flexibility cap of 5%. There is no such 5% limit in the Core Strategy, and given the reason why the Inspector considered flexibility was needed, it is evident that a 5% flexibility cap is inadequate and inappropriate.</p>	<p>The 5% cap is considered to be appropriate to ensure that the minimum amount of Green Belt land, as set out in the Plan, is released to meet need.</p> <p>The Plan has inbuilt flexibility to ensure that sites identified later in the plan period can be brought forward if necessary to meet shortfall earlier in the plan period. In addition housing supply is also made up of windfall sites which will be monitored through the Annual Monitoring Report.</p>
<p>The Council relies heavily on the brownfield sites to deliver a significant proportion of its housing requirement, yet even the Inspector has raised concerns on whether these can deliver, and has accepted the Core Strategy on the basis of the implied flexibility within.</p>	<p>The Allocations Document provides flexibility in both terms of timing and quantum of development in respect of Green Belt release sites.</p>
<p>Policy SER1</p>	
<p>Development will have a visual impact on the rural nature of the area and the views of the Church and Windmill, and the approach into and out of Rayleigh, particularly to the town centre.</p>	<p>The potential visual impact of development on this proposed site has been considered during the preparation of the Allocations Document (for example paragraph 3.46).</p> <p>Further evidence of consideration given to the effect on the rural nature of the area and visual impact of development is provided within Detailed Assessment of Potential Residential Site Options (September 2012).</p>

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<p>Green Belt is important to prevent coalescence of settlements, and should not be developed. Green Belt between Wickford and Rayleigh will be reduced.</p> <p>The setting of Rawreth as a separate settlement will be undermined.</p>	<p>The Council has carefully considered options for the allocation of land to the north of London Road, taking into account factors such as on site constraints, accessibility and topography. The area identified would not encourage coalescence with other settlements, or undermine Rawreth as a separate settlement, as a green buffer to the west of the site (public parkland) would be required to accompany any development.</p>
<p>It is not clear why a green buffer is required, and the remaining farmland cannot continue in arable use.</p>	<p>A green buffer, in the form of public parkland (as required by the Core Strategy and subsequently the Allocations Document), is proposed to accompany development of the site. This would ensure the creation of a defensible Green Belt boundary in this location.</p>
<p>Fewer houses should be built and the development should not extend as far west.</p>	<p>The number of dwellings proposed for this site accord with the adopted Core Strategy, and the area identified would ensure the delivery of dwelling and infrastructure requirements, and takes into account onsite constraints.</p>
<p>Rawreth Hall will lose its rural setting.</p>	<p>The proposed development is not directly adjacent to Rawreth Hall. A green buffer to the west of the site (public parkland) would be required to accompany any development. The proposed development would not undermine the setting of this building.</p>
<p>Redundant land at Rawreth Industrial Estate should be used for housing.</p>	<p>Rawreth Industrial Estate is proposed to be reallocated in its entirety for residential development (Policy BFR4).</p>
<p>In conjunction with the development of the former Eon site, traffic along London Road will increase and become more difficult to cross.</p>	<p>Traffic assessments are required to accompany strategic planning applications. Essex County Council Highways would only require area wide traffic assessments to be carried out for development plan documents if they have significant concerns about the impact on the transport network.</p> <p>In addition a Transport Supplementary Planning Document is being prepared in consultation with Essex County Council and Parish/Town Councils.</p>

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It is good that flooding has been addressed, and public open space has been included. Such spaces must be retained.	Noted.
A bus route along London Road is needed.	There are existing bus routes along London Road, however, public transport infrastructure improvements and service enhancements would be required to accompany development of this site (paragraph 3.17).
A bus route through the site will not alleviate the problems development of the site would create.	A bus route would connect the proposed development to Rayleigh town centre, including the train station.
Recent developments along London Road and Vernon Avenue have impacted on the amenity of residents.	It is unclear what planning applications are referred to, however, residential amenity would have been carefully considered at the detailed planning application stage.
Other small areas of scrubland/plotland/brownfield land e.g. along Daws Heath Road, Great Wheatleys, south of London Road and north of Rawreth Lane should be considered to meet housing need rather than open Green Belt land.	The area identified for development accords with the general location of 'North of London Road, Rayleigh' set out in the adopted Core Strategy.
Road improvements are not proposed. A relief road towards Hullbridge would need to be developed to ease congestion.	Local highway capacity and infrastructure improvements would be required to accompany development of this site (paragraph 3.17). The precise details would be determined at the planning application stage.
It was questioned who will gain from the proposed development.	The proposed development would deliver housing to meet need.
Although education has been addressed, increased pressure on services such as doctors and police has not.	The Council has prepared the Core Strategy and subsequently the Allocations Document in consultation with numerous infrastructure providers, including Essex County Council (highways, education, and public transport departments), Anglian Water, Environment Agency and the South East Essex Primary Care Trust.

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Whilst the area identified in Figure 6 can meet the Core Strategy dwelling and infrastructure requirements pre-2021, it does not provide enough flexibility to accommodate shortfalls elsewhere, contrary to the Core Strategy.	Flexibility has been integrated into the sites identified in the Allocations Document to address potential shortfalls during the plan period. Housing supply will be monitored through the Annual Monitoring Report. Sites identified later in the Plan period to meet need can be brought forward.
The Allocations Document has a relatively short time horizon (up to 2025), and given the commitment to a review of the Core Strategy, there is a lack of certainty as to where development will be located in the future.	This will be determined through the review of the Core Strategy.
Safeguarded land should be identified to ensure that Green Belt boundaries set now will endure beyond the length of the Plan period to be in compliance with the NPPF.	Land which is proposed to be released for development post 2021 has been identified separately within the document (for example SER6). Safeguarded land is not proposed in the general location to the North of London Road, Rayleigh.
The Concept Statement should be amended to make clear that any safeguarded land is not allocated for development.	Safeguarded land is not proposed in the general location to the North of London Road in Rayleigh.
It is uncertain whether the proposed Green Belt boundaries would need to be altered within the current Plan period to cater for lack of delivery elsewhere (the 5% flexibility allowance is insufficient) or whether they would not need to be altered at the end of the Plan period.	The Plan has inbuilt flexibility to ensure that sites identified later in the plan period can be brought forward if necessary to meet shortfall earlier in the plan period. In addition housing supply is also made up of windfall sites which will be monitored through the Annual Monitoring Report.
It is unclear why the northern end of the western boundary in Figure 6 does not follow the pylon line, and why the strip of land between the pylon line and the western boundary should be kept permanently open, when this is not the case for the southern end of the site. The site boundary should follow the pylon line.	The site identified is the minimum size necessary, taking into account on-site constraints, to meet dwelling and infrastructure requirements.
There is no definitive guidance on appropriate off-set distances from power lines, and no clear justification for a 60m off-set. A distance of	Although there is no definitive guidance, National Grid notes that "Where development takes place and how it is designed are principally matters for

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around 30m between the pylon line and any development is proposed.	the landowner, developer and the local planning authority to determine.” ² The Council consider that 60m distance from the pylon line would be appropriate, based on the findings/recommendations of two reports ³ .
The site boundary should be extended further to the west of the pylon line (to encompass Rawreth Hall and land to the south), however, as the Concept Statement requires a green buffer to the west of development, land between the pylons and western boundary of the site could remain open. The proposed boundary would a) ensure compliance with the NPPF; b) provide flexibility to accommodate any shortfall in housing delivery; c) ensure the delivery of the required infrastructure within the development boundary (such as access to the west of the pylon line); d) enable open spaces uses such as any relocated playing fields to be provided within the development boundary; and e) allow a comprehensive approach to masterplanning.	If land to the west of the pylons would remain open, it is unnecessary to remove the area between the pylons and Rawreth Hall from the Green Belt. The green buffer, as set out in Paragraph 3.35 will take the form of public park land in accordance with the Core Strategy. The Plan has inbuilt flexibility to ensure that sites identified later in the plan period can be brought forward if necessary to meet shortfall earlier in the plan period. In addition housing supply is also made up of windfall sites which will be monitored through the Annual Monitoring Report. The required infrastructure can be delivered on the site identified, particularly with the relocation of the playing field along London Road. The relocated facility does not necessarily need to be within the development area.
Paragraphs 3.24-3.25 setting open space requirements are too prescriptive and restrict design solutions. Open space requirements should be combined, and the masterplan should determine the best configuration for the site.	The open space requirements are based on the recommendations within the Open Space Study having regard to dwelling provision. The exact detailed design of the development would be agreed at the planning application stage.
In advance of more detailed traffic modelling, it is inappropriate to be precise about the split of traffic between the northern and southern access points (paragraph 3.27/Figure 7). The text should be caveated	Paragraph 3.27 and Figure 7 were derived from discussions/consultation with Essex County Council Highways. The diagram illustrates one of the potential options for the site. The diagram does not purport to be definitive.

² National Grid’s ‘Development near overhead lines’ (page 11). Available from: <http://www.nationalgrid.com/NR/ronlyres/4DD2D3FF-B973-4F3C-A8C3-CDB640526660/45082/Developmentnearoverheadlines.pdf>

³ Cross-Party Inquiry into Childhood Leukaemia and Extremely Low Frequency Electric and Magnetic Fields (ELF EMF), July 2007. Available from: <http://www.emfs.info/The+Expert+View/crossparty.htm>. Stakeholder Advisory Group on ELF EMFs (SAGE) Precautionary approaches to ELF EMFs, April 2007. Available from: <http://www.emfs.info/Related+Issues/SAGE/SAGE+downloads.htm>

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with the addition of "subject to more detailed testing through the site Masterplan and application stages".	The detailed design of highways would be determined and agreed at the planning application stage.
The first sentence of paragraph 3.27 should be amended to clarify whether two points of access from both London Road and Rawreth Lane, or two points of access overall are required. The latter is correct.	The paragraph in question states that <u>at least</u> two access points from London Road and Rawreth Lane should be provided. The detailed design of highways would be determined and agreed at the planning application stage.
There is a lack of evidence underpinning the suggestion of two points of access to London Road. It is unclear as to what the function of a 'circular link' might be. This text should be deleted if it is not justified.	<p>The two access points onto London Road are not definitive given the wording of paragraph 3.27. A 'circular link' means that the two access points could be connected as indicated on Figure 7. Paragraph 3.27, however, suggests that this should be explored, it is not a requirement.</p> <p>These two potential options were derived from discussions with Essex County Council Highways, and should be explored.</p> <p>The detailed design of highways would be determined and agreed at the planning application stage.</p>
There is no justification as to why greenspace (paragraph 3.35) should be publically accessible or form parkland. The preceding paragraphs establish the quantum of formal/informal open space necessary to meet the needs of residents from the development, and therefore there is no quantitative need for additional publically accessible greenspace above and beyond that provided within the site. If the objective is to maintain a green buffer, then the retention of land in agricultural use would be equally effective.	<p>Core Strategy Appendix H1 (page 54) requires public parkland to be provided as a buffer between the built environment and the A1245.</p> <p>An area at risk of flooding runs through the site as is required to accommodate public open space in accordance with the NPPF.</p>
Paragraph 3.35 suggests that allotments 'may' be provided within the green buffer, however, rather than locating on the western fringe of the development, which may not be desirable in landscape terms, other locations (e.g. between new development and Rawreth Industrial Estate)	The Plan suggests that allotments may be accommodated in the green Buffer to the west, rather than suggesting that they must be (paragraph 3.35). The appropriate location of allotments will be determined in detail at the planning application stage.

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<p>may be more appropriate. The reference to allotments should be a new paragraph and it should be made clear that there are other locations within the site where the allotments may be provided.</p>	
<p>The requirement to relocate the existing playing fields (paragraph 3.37) within 340m of the existing site is inappropriate. Given the constrained nature of alternative siting options, the cost of replacement (e.g. levelling the site), and the desire of the Council not to move the pitches further away from existing residents, the most appropriate option could be to leave the pitches in their current location.</p>	<p>The relocated playing field and clubhouse should be located in such a way that it is accessible to local residents but does not have an adverse impact on the amenity of nearby residents. Exact details will be determined at the planning application stage.</p> <p>It is recommended (in response to Comment 64 of specific and general consultation body comments) that the requirement in relation to the clubhouse is amended to make clear that whilst it is expected that it will be located within 340 metres of its existing location, an alternative location within the vicinity may be acceptable if this is shown to be more appropriate (paragraph 3.37).</p>
<p>Relocation of the playing pitches should not result in the unnecessary delay of the development itself given the timescales involved. The BREEAM criteria should be an objective to achieve rather than a requirement.</p>	<p>BREEAM is a requirement of the Core Strategy.</p>
<p>Paragraph 3.37 should be amended as follows: “The playing fields to the south of the site along London Road <u>may be relocated as part of the development</u>. A replacement sports field with new ancillary facilities together with a new club house <i>would</i> be required to be</p>	<p>The area identified to meet dwelling and infrastructure requirements is set out in Figure 6. This includes the area that currently accommodates playing pitches, which are proposed to be relocated as part of development in this general location.</p>

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<p>provided ahead of any removal of the existing facility so as to ensure the continued and uninterrupted operation of this valuable community facility. <i>It will be necessary to ensure however that any relocation does not delay or prejudice the implementation of the development in accordance with the timescale set out in the adopted Core Strategy. The Council will encourage any new structure 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. The location of any replacement facility should be established within the Masterplan to be prepared for the site, and should be informed by consultation with the existing users. Additionally any new facility should be well connected to the pedestrian and cycling network."</i></p>	<p>Paragraph 3.37 is also proposed to be amended in response to Sport England's comments received during the pre-submission consultation (Comments 64, 65 and 66 of specific and general consultation body comments).</p>
<p>Given the proximity of shops to the site, it is unlikely that a neighbourhood parade of shops within this development would be viable (paragraph 3.45). Reference to such a facility should be changed to "could be integrated" rather than "should be integrated". However, a mix of uses (e.g. small-scale business use) particularly in the light of the lack of deliverability of the proposed commercial allocation south of London Road (NEL1) could be incorporated into the development.</p>	<p>The viability of providing neighbourhood shops within the development would be considered in detail at the planning application stage, as per paragraph 3.45.</p> <p>Compensatory employment land is proposed to be allocated to the south of London Road (NEL1).</p>
<p>Allocations supported, however, the area at risk of flooding should not accommodate residential development.</p>	<p>Paragraph 3.3 notes that a portion of the site is located within an area at risk of flooding and requires that this land is set aside for public open space.</p>
<p>The western boundary of the site should be defensible.</p>	<p>A green buffer to the west of the site is required within the Core Strategy and Policy SER1 (paragraph 3.17 and 3.35). This should take the form of public parkland and would create a defensible western Green Belt boundary.</p>
<p>The impact of the proposed development on London Road needs major consideration, as there are several estates plus other minor roads</p>	<p>The impact of the proposed development on both Rawreth Lane and London Road will be considered in detail at the planning application stage.</p>

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connecting to it, and it already experiences high volumes of traffic and congestion. Other developments, either under construction or planned, along the London Road should also be considered. Road widening and footpath provision should be considered.	Local highway capacity and infrastructure improvements are required to accompany any development of the site. This would be detailed at the planning application stage.
Policy SER2	
Support the proposed site. The western boundary needs to create a defensible Green Belt boundary.	Noted. A green buffer to the west of the site is required in Policy SER2 (paragraph 3.57). This should be publically accessible open space, and would create a defensible western Green Belt boundary.
The Council clearly anticipates a greater provision of housing at West Rochford by defining the delivery of 600 houses as a minimum. There is concern that this is contrary to the principles established in the Core Strategy, its evidence base and the NPPF.	The housing targets for the District set out in the Core Strategy are minimums in accordance with the, now revoked, East of England Plan (Policy H1). The site identified as SER2 has already been granted outline planning permission.
The projected delivery is ambitious both from the perspective of the anticipated delivery start date and in terms of the projected annual provision.	The SHLAA 2012 review anticipates that the first dwellings could be built on site in 2013/14 with the final dwellings completed in 2017/18. It is expected that between 50 and 200 dwellings are to be built per year.
The Council may not be able to identify a five year supply of deliverable housing sites that accords with the NPPF and recent appeal decisions.	<p>Both the Annual Monitoring Report and the SHLAA 2012 Review demonstrate that the Council has a five year supply of land for housing.</p> <p>In addition, the Core Strategy also stated that the Council will maintain a flexible approach with regards to the timing of the release of land for residential development to ensure a constant five-year supply of land. Therefore, the Council should be able to respond to any changes in land supply promptly with such an approach.</p>
The housing provision targets contained within the Core Strategy, and by extension within the housing land supply numbers, do not meet the requirement of the NPPF to meet the 'full objectively assessed needs for	The Core Strategy housing figures were based on the, objectively assessed, targets set out in the East of England Plan (2008) which was revoked on 3 January 2013. Affordable housing requirements were objectively assessed

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market and affordable housing' (paragraph 47).	within the 2008 Strategic Housing Market Assessment, but the 2010 Affordable Housing Viability Study found that a maximum of 35% affordable housing would be appropriate, unless demonstrated to be unviable.
<p>Housing supply is likely to be constrained on a number of sites, particularly BFR3, SER2 and SER9b.</p> <p>A small site to the south of Stambridge Road (previously developed land) is considered suitable for alternative planning uses, including residential and/or local health uses.</p>	<p>Potential constraints to development have been considered during the development of the Plan.</p> <p>Noted.</p>
Support for the proposed site. Technical assessments conclude that the site is well located to existing local services, free of technical constraints and can be effectively integrated with the existing urban form and remaining countryside.	Support noted.
Outline planning permission was granted, subject to the completion of the Section 106 agreement, on 18 January 2012, but the planning process has been delayed due to a challenge to the Core Strategy.	Noted (Ref: 10/00234/OUT).
<p>This matter has now been resolved and the application is expected to be reconsidered at planning committee on 31 January 2013 following agreement with officers and ward councillors of the key Section 106 provisions.</p> <p>It should be noted that all of the statutory stakeholders have signed off the proposals and there are no technical objections to the scheme. If the scheme is approved on 31 January, it is intended that the section 106 agreement will be signed within one month.</p>	It is noted that the Section 106 agreement is expected to be signed off soon, followed by consideration of the reserved matters.

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Policy SER3	
<p>The 5% flexibility allowance is not sufficient to accommodate a shortfall in housing provision in the centre of Hockley. There should be increased flexibility in terms of housing numbers elsewhere in the document.</p>	<p>The emerging Hockley Area Action Plan has identified the number of dwellings to be provided within the centre of Hockley.</p> <p>The SHLAA identifies alternative brownfield land within Hockley, which have the potential to meet dwelling requirements. Windfall sites can also meet this need.</p> <p>The Council has identified the minimum amount of Green Belt required to meeting dwelling requirements.</p> <p>Outline planning permission has been granted for the development of 50 dwellings on the brownfield land identified in Policy SER3 (Ref: 12/00283/OUT).</p>
<p>The area identified in the Plan is smaller than that previously identified, which included 'Windfield' along Church Road to the north and west of this area. An additional 20 or 30 homes could be delivered. Improved access/egress could be provided. The identified infrastructure requirements would not be impacted. 'Windfield' should be considered for inclusion, and development of the site could retain those areas subject to Tree Preservation Orders.</p>	<p>The site referred to as 'Windfield' was included as a potential option within the Discussion and Consultation Document (Option WH5). This site was considered in further detail within the Detailed Assessment of Potential Residential Site Options (September 2012).</p> <p>However, this site has not been put forward to the Council for consideration previously.</p> <p>The site identified within Policy SER3 can accommodate the dwelling and infrastructure requirements for this general location. In addition, an outline planning application for the development of 50 dwellings on the previously developed part of the site has already been approved.</p>
<p>Pond Chase Nursery in Folly Lane has been subject to a planning application. This policy is supported.</p>	<p>An outline application for up to 50 dwellings on this site and associated infrastructure (Ref: 12/00283/OUT) was approved by the Council in</p>

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	November 2012 subject to the completion of a Section 106 agreement.
This proposal would redevelop previously developed land and create a defensible Green Belt boundary.	Noted.
Westview, Church Road is readily deliverable and can accommodate 7 dwellings.	An outline planning application for 7 dwellings on this part of SER3 has been submitted (Ref: 12/00586/OUT).
We disagree with the description at paragraph 3.79. This land is not Greenfield land it is garden land and PDL (LDC certificate 99/00785/LDC) PD buildings foundations piled (commenced) and garage for plot 8 foundations all piled more than 4 years ago. There is no wooded area and only some hazel bushes in the middle of the land. This land remains garden land.	Garden land is greenfield land in accordance with the NPPF. Planning permission for the part of the site identified in SER3 does not have planning permission for development and is located in the Green Belt, although it is noted that planning permission was granted for the area to the south (Ref: 06/01095/FUL). The site is not considered to meet the definition of previously developed land in accordance with the NPPF.
We agree that the site can support a minimum of 50 units and this will need to be exceeded as minimum targets have now been swept away by the DCLG.	As noted within the Plan, the number of additional dwellings provided should be justified in accordance with paragraph 3.83, and in any case should not exceed 50 dwellings by more than 5%.
The Pond Chase Nursery site has been approved at a density of 21.9 dwellings per hectare and not 30 as set out in this document and thus the contribution of PC Nurseries will under-perform and all the more important for the 7 at Westview to be built without further delay and as it is unlikely that all 50 will be built by 2015.	Outline planning permission for the development of up to 50 dwellings on this part of the site was approved in November 2012 (Ref: 12/00283/OUT) subject to the completion of a legal agreement under Section 106. It is anticipated that 50 dwellings will be delivered on the site in the given timescale.
There will be no adverse consequence for the objectives listed in paragraph 3.81 as this part of the site can be developed independently but coherently with no impact on any of those stated objectives.	Any development on the area identified as SER3 in the Plan would need to contribute appropriately to the infrastructure requirements set out in paragraph 3.81.

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Policy SER4	
<p>The area identified is not flexible enough to accommodate a shortfall in housing provision. 5% flexibility is restrictive.</p> <p>The proposed Green Belt boundary does not rely on permanent features and is not therefore easily defensible as required by the NPPF.</p> <p>The extent of this site should be increased in a southerly direction to allow for redevelopment of dwellings in the rural settlement area. This would increase levels of housing provision and provide a more defensible Green Belt boundary at the road edge.</p>	<p>A planning application for the site identified in Policy SER4 has been submitted and approved (Ref: 12/00381/FUL) to accommodate the dwelling and infrastructure requirements set out in the Core Strategy. This permission is being implemented.</p> <p>The proposed Green Belt boundary would be defensible.</p>
<p>Allocation supported, however, the area at risk of flooding should not accommodate residential development.</p>	<p>Paragraph 3.113 requires that the area subject to flood risk (approximately 0.5 hectares) is set aside as open space.</p>
Policy SER5	
<p>Allocation supported, however, the document should acknowledge that planning permission has been granted for this site.</p>	<p>Noted.</p>
Policy SER6	
<p>This site is located in the Green Belt. There is a limited amount of Green Belt and the proposal is contrary to its purpose. The Green Belt should be preserved, and not developed/eroded.</p>	<p>The Council has demonstrated with the Core Strategy and supporting evidence that Green Belt land needs to be allocated to meet housing and employment needs through the plan period.</p>
<p>Development on this site would remove all the Green Belt to the west of the parish.</p>	<p>There would still be Green Belt land allocated to the west of the village.</p>

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The development would be outside of the existing village and would be detrimental to the current community.	The proposed development is an extension to the existing village.
I feel some one has looked at a map and said 'that looks a good place to build' without looking at the actual area.	South West Hullbridge as a general location for residential development is identified in the adopted Core Strategy (Policy H2). Appropriate sites within this general location have been assessed in depth within the SHLAA 2012 Review and the Detailed Assessment of Potential Residential Site Options (September 2012).
The proposed development is not proportional to the size of the village. Fewer or no homes should be developed. The number of houses should be reduced to the original plan of 100.	<p>The general location of South West Hullbridge was identified in the Core Strategy for the allocation of 500 dwellings from 2015 to post-2021 (Policy H2 and H3).</p> <p>The area identified can accommodate the dwelling and infrastructure requirements for this general location.</p>
Whilst there will be a demand for more housing from existing residents and their families, the demand is considerably less than that proposed.	The general location of South West Hullbridge was identified in the Core Strategy for the allocation of 500 dwellings from 2015 to post-2021 (Policy H2 and H3).
Only SER6a (circa 250 units) should be developed, the remaining units should be redistributed to allocations attached to higher order settlements.	The general location of South West Hullbridge was identified in the Core Strategy for the allocation of 500 dwellings from 2015 to post-2021 (Policy H2 and H3).
Brownfield sites within the village should be developed instead.	The SHLAA has identified appropriate brownfield sites for redevelopment to meet housing need. However, this demonstrates that there is a shortfall of land that has been previously developed for housing, and so the Council must allocate Green Belt land to meet this need.
There is little evidence that local population growth requires more homes.	The distribution of housing in the District was part of the strategic approach set out in the adopted Core Strategy. This is not an issue for the Allocations

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	Document.
The proposed development of 500 dwellings would result in a 20% increase in the village population and would change the community/village feel due to its scale, density, and the proportion of affordable homes required. It is too large and would over-populate the area.	The general location of South West Hullbridge was identified in the Core Strategy for the allocation of 500 dwellings from 2015 to post-2021 (Policy H2 and H3).
The local primary school and the doctor's surgery do not have the capacity to accommodate the proposed development. Consult the doctor's practice in Ferry Road. There are no secondary schools, a bank or a dentist in the village. There is a lack of sewage requirements. How will the pumping station be upgraded? Investment in infrastructure would be required such as expansion of the primary school, doctor's surgery, and secondary schools and upgrades to highways, drainage, sewage, water and power supplies.	<p>The Council has prepared the Core Strategy and subsequently the Allocations Document in consultation with numerous infrastructure providers, including Essex County Council (highways, education, and public transport departments), Anglian Water, Environment Agency and the South East Essex Primary Care Trust.</p> <p>Improvements to infrastructure required to accompany development of proposed sites are set out in Appendix H1 of the Core Strategy and within the policy (paragraph 3.158).</p>
Has there been any assessment regarding school places in the area or if a new school would be required? Where will children attend school?	The Council has worked closely with Essex County Council Schools Children and Families service throughout the production of the Core Strategy and this document to ensure that schools have the capacity to support increased population, and if not where was the most appropriate site to locate any new educational facilities. Provision for increased capacity at existing secondary schools has also been accounted for.
Schools should be provided as Hullbridge Infant and Junior Schools have now amalgamated and all the Junior Schools in Rayleigh are full.	
The development would increase the number of children attending the local school and in each class would be detrimental to the education of the children.	

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<p>There has been no proper assessment of infrastructure, particularly road improvements. This should be detailed before consultation on the Plan.</p>	<p>The Council has prepared the Core Strategy and subsequently the Allocations Document in consultation with numerous infrastructure providers, including Essex County Council (highways, education, and public transport departments), Anglian Water, Environment Agency and the South East Essex Primary Care Trust.</p> <p>Improvements to infrastructure required to accompany development of proposed sites are set out in Appendix H1 of the Core Strategy and within the policy (paragraph 3.158).</p>
<p>There are existing issues with the highway network; the roads in the area are inadequate (for example Watery Lane, Malyons Lane, Windermere Avenue), bad weather affects the roads and journey times, for example flooding/closure of Watery Lane which causes congestion on other roads, and many roads in the village are unmade or narrow unadopted roads. The junction of Hullbridge Rd and Rawreth Lane cannot cope when Watery Lane is closed. This junction and other junctions may not be able to cope with additional traffic.</p>	<p>Local highway capacity and infrastructure improvements, including to Watery Lane and Watery Lane/Hullbridge Road junction will be required to accompany development of this site. The precise details will be determined at the planning application stage.</p> <p>Essex County Council is responsible for addressing the current issues with flooding along Watery Lane, and has recently undertaken a programme of ditch clearing to alleviate these issues.</p>
<p>There is no funding available to upgrade or replace Watery Lane for a decade or more, since it is not considered viable in this economic environment. The Highway Authority's view is that current and future traffic should be discouraged from using it, and that traffic wishing to access Basildon and Chelmsford should be encouraged.</p>	<p>Watery Lane is required to be improved as part of the local highway capacity and infrastructure improvements to accompany development of SER6 in accordance with the Core Strategy.</p> <p>A developer would be required to fund any highway improvements / requirements on-site, and would be required to pay contributions towards other off-site improvements through Section 106 agreements or Community Infrastructure Levy (CIL) payments.</p>
<p>Proposed development for Rayleigh (SER1 and BFR4) will use Rawreth Lane, which is already a congested route. The Highway Authority says that it cannot justify expenditure from its own resources, so these</p>	<p>The Council will require contributions from developers to improve local highway capacity and infrastructure improvements.</p>

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improvements can only be funded by developers.	
The southern end of the village takes a lot of through-traffic (for example from Rayleigh and Hockley, towards Chelmsford).	The Council seeks to avoid non-local traffic on local routes for non-local reasons.
The impact of problems with roads outside the area such as the A127 has not been considered.	The Council has considered highway infrastructure throughout the preparation of the Core Strategy and the Allocations Document. The Core Strategy (Appendix H1 in particular) identifies where improvements to the highway network would be required to accompany residential development in Policies H2 and H3. This was scrutinised during the Core Strategy examination.
Residents do not want the roads to be adopted and connectivity to the development via these roads will need resident's permission.	Noted. A private road would have to be brought up to the local highway authority's standards before it can be considered for adoption.
The village is only served by one road, and there is concern that there could be problems in emergencies.	The Concept Statement (paragraph 3.182) anticipates that the site would have two access/egress points as required by Essex County Council Highways; one onto Lower Road to the south and one to the east of the site.
Traffic congestion will increase in the area and air quality will decrease.	Local highway capacity and infrastructure improvements, including to Watery Lane and Watery Lane/Hullbridge Road junction will be required to accompany development of this site. The precise details will be determined at the planning application stage.
Little consideration has been given to the development of Watery Lane - this must be done prior to any building undertaken.	Local highway capacity and infrastructure improvements, including to Watery Lane and Watery Lane/Hullbridge Road junction will be required to accompany development of this site. The precise details will be determined at the planning application stage.
Watery Lane must be raised by at least 3 to prevent its closure due to flooding.	Local highway capacity and infrastructure improvements, including to Watery Lane and Watery Lane/Hullbridge Road junction will be required to

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<p>A new highway should be required leading to the A1245 to allow traffic to flow in either direction and not direct traffic through the village.</p>	<p>accompany development of this site. The precise details will be determined at the planning application stage.</p>
<p>There is no overall transport strategy or policy for the proposed development, including those in close proximity to Hullbridge. The roads in the area would need to be improved, but there is a lack of detail in the Plan of what would be required. Traffic surveys of roads in and around Hullbridge and Rayleigh should be undertaken. Essex County Council has not assessed the proposals.</p>	<p>The Council has considered highway infrastructure throughout the preparation of the Core Strategy and the Allocations Document. The Core Strategy (Appendix H1 in particular) identifies where improvements to the highway network would be required to accompany residential development in Policies H2 and H3. This was scrutinised during the Core Strategy examination. For Hullbridge specifically, as set out in paragraph 3.158 of the Allocations Submission Document, local highway capacity and infrastructure improvements, including to Watery Lane and Watery Lane/Hullbridge Road junction will be required to accompany development of this site. However, the precise details will be determined at the planning application stage.</p> <p>Essex County Council as the highways authority have been closely consulted throughout the process of the Core Strategy and the Allocations DPD and as such have considered the cumulative, and individual, impact of the developments across the District on the highway network. The consideration of potential sites has included views from the Highways Authority. This was done on an individual location basis and on a cumulative basis which assessed the impact of the cumulative development.</p>
<p>The Transport Strategy that the Council intends to produce will only be a Supplementary Planning Document.</p>	<p>The Transportation Strategy will be a Supplementary Planning Document in accordance in accordance with the Core Strategy. As noted in the Core Strategy, this document will provide further detail and guidance on the transportation issues outlined in the Core Strategy.</p>
<p>A transport assessment, prepared by developers, will only relate to SER6, and will not take account of highway issues or other developments elsewhere in the District (for example SER1), which will exacerbate current issues.</p>	<p>The Council has considered highway infrastructure throughout the preparation of the Core Strategy and the Allocations Document. The Core Strategy (Appendix H1 in particular) identifies where improvements to the highway network would be required to accompany residential development</p>

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	in Policies H2 and H3. This was scrutinised during the Core Strategy examination.
Any improvements should precede, rather than accompany development.	This would be determined at the planning application stage.
Highway improvements will be expensive.	A developer would be required to pay Essex County Council Highways directly for any highway improvements/requirements on-site, and would be required to pay contributions towards other off-site improvements through Section 106 agreements.
Watery Lane, if improved, still leads either to Battlesbridge which is a bottle neck, with a one way system over a weight restricted bridge or at the Lower Road (Hullbridge end) leads either to Rayleigh with an impediment to free flowing traffic at its junction with Rawreth Lane.	<p>Watery Lane also connects to the A1245 via Beeches Road and Chelmsford Road.</p> <p>Local highway capacity and infrastructure improvements will be required to accompany development of this site, and other proposed development sites in the locality including to the north of London Road (SER1) and Rawreth industrial Estate (BFR4). The precise details will be determined at the planning application stage.</p>
The use of the word 'should' ought to be replaced with 'must' (for example paragraph 3.178) to ensure commitment to road improvements.	Local highway capacity and infrastructure improvements will be required to accompany development of this site. The precise details will be determined at the planning application stage.
The Plan does not consider local residents need to travel, for example work, shopping, particularly given proposed development in other areas.	Essex County Council as the highways authority have been closely consulted throughout the process of the Core Strategy and the Allocations DPD and as such have considered the cumulative, and individual, impact of the developments across the District on the highway network. The consideration of potential sites has included views from the Highways Authority. This was done on an individual location basis and on a cumulative basis which assessed the impact of the cumulative development.
Access would need to be carefully considered, and more detail should be	At least two access/egress points would be needed to serve the proposed

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<p>provided. There are limited ‘through’ roads in the village. Proposals to use existing roads to access the new development is inappropriate as these roads are not suitable, for example Malyons Lane, and would impact on residents. There should be no vehicular access into Hullbridge from the development. Access should be pedestrian only.</p>	<p>development, as advised by Essex County Council. The most appropriate road to connect the site to the village would be determined at the planning application stage. All other roads to the east of the site would provide pedestrian access to enhance community cohesion.</p>
<p>The junction of Malyons Lane and Ferry Road is on hill, and would become an accident black spot. No vehicular access must be allowed from Ferry Road. Ferry Road is a very busy, poorly surfaced road.</p>	<p>The most appropriate road to connect the site to the village would be determined at the planning application stage. All other roads to the east of the site would provide pedestrian access to enhance community cohesion.</p>
<p>Access and egress from the proposed development would be from Windermere Avenue. Part of this road is currently unadopted and not a publicly maintainable highway. Access to the proposed development would be over the unadopted part of Windermere Avenue. It would create traffic congestion, noise, pollution for this road and Ferry Road.</p>	<p>The most appropriate road to connect the site to the village would be determined at the planning application stage. All other roads to the east of the site would provide pedestrian access to enhance community cohesion.</p> <p>A private road would have to be brought up to the local highway authority’s standards before it can be considered for adoption.</p>
<p>An assessment should be undertaken setting out improvements to all roads in the District required by the proposed development sites. Any improvements/upgrades required should be completed prior to development of the site.</p>	<p>The Council has considered highway infrastructure throughout the preparation of the Core Strategy and the Allocations Document. The Core Strategy (Appendix H1 in particular) identifies where improvements to the highway network would be required to accompany residential development in Policies H2 and H3. This was scrutinised during the Core Strategy examination.</p> <p>Essex County Council as the highways authority have been closely consulted throughout the process of the Core Strategy and the Allocations DPD and as such have considered the cumulative, and individual, impact of the developments across the District on the highway network. The exact highway improvements will be determined at a later stage of document production process, when the exact sites have been assessed and selected. The consideration of potential sites has included views from the Highways Authority. Once the sites were selected, the highways authority was</p>

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	consulted to ascertain the exact highways requirements. This was done on an individual location basis and on a cumulative basis which assessed the impact of the cumulative development
It is unclear who will be responsible for road improvements.	A developer would be required to pay Essex County Council Highways directly for any highway improvements/requirements on-site, and would be required to pay contributions towards other off-site improvements through Section 106 agreements.
Improvements to Watery Lane, Ferry Road, Watery Lane/Hullbridge Road junction, Rawreth Lane/Hullbridge Road junction, Rawreth Lane/Downhall Park Way junction and Fairglen Interchange (A127/A130/A1245) are needed. The Fairglen Interchange floods causing congestion issues, and should be considered.	<p>The Council has considered highway infrastructure throughout the preparation of the Core Strategy and the Allocations Document. The Core Strategy (Appendix H1 in particular) identifies where improvements to the highway network would be required to accompany residential development in Policies H2 and H3. This was scrutinised during the Core Strategy examination.</p> <p>Essex County Council as the highways authority have been closely consulted throughout the process of the Core Strategy and the Allocations DPD.</p>
Watery Lane should be classified as an 'A' road and a by-pass should be considered.	Improvements to Watery Lane will be considered in more detail at the planning application stage.
Ferry Road should be mentioned in the Plan.	Ferry Road is mentioned in the Plan (paragraph 3.182) but not in the context of highway improvements. However, local highway capacity and infrastructure improvements will be required to accompany development of this site. The precise details will be determined at the planning application stage.

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<p>The Plan mentions that SER6 should contribute towards improvements to the highway network at the western part of the network, but there is no definition of what is 'western', and why other developments in the 'western' part of the district, such as the site identified in SER1, have no such requirement.</p>	<p>The western part of the network refers to improvements to Watery Lane to the west of the site:</p> <p>"In particular, the development of this site should contribute towards improvements to the highway network to facilitate movement along the western part of the network." (paragraph 3.177).</p> <p>Other proposed development sites in the 'western' part of the District are required to implement local highway capacity and infrastructure improvements in conjunction with development.</p>
<p>It makes no sense for a Hullbridge developer to have to make a financial contribution to road improvements 2-4.5km away, especially when a significantly greater number of new houses are to be built along that road by other developers.</p>	<p>Local highway capacity and infrastructure improvements will be required to accompany development of this site, and other proposed development sites in the locality including to the north of London Road (SER1) and Rawreth industrial Estate (BFR4). The precise details will be determined at the planning application stage.</p>
<p>Potential improvements at Hullbridge are likely to have no impact at all unless and until road improvements Rawreth Lane have been completed.</p>	<p>It is expected that development to the north of London Road (SER1) would take place around the same time as the first phase of development in Hullbridge (SER6a) between 2015 and 2021.</p> <p>Local highway capacity and infrastructure improvements will be required to accompany development of this site. The precise details will be determined at the planning application stage.</p>
<p>The Plan does not take into account the other proposals for the area; (Hockley, Ashingdon, Canewdon and Rawreth).</p>	<p>The strategic approach to development set out in the Core Strategy considered the potential impact of development in the general locations identified. The Allocations Document conforms to the Core Strategy.</p>
<p>There are limited local job opportunities, and it is uncertain where new residents will work.</p>	<p>Noted. The provision of jobs has been considered in conjunction with housing delivery throughout the Core Strategy and Allocations Document.</p>

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Jobs should be considered in conjunction with housing.	The delivery of employment land during the plan period has been considered in conjunction with housing allocations (SER1-SER9 and NEL1-NEL3).
Increased commuting to other areas for employment, for example Southend, Basildon, Rayleigh, Chelmsford and London (via Rayleigh station) will exacerbate traffic issues.	The relationship of different parts of the District was considered during the preparation of the Core Strategy, which notes at paragraph 2.62 that “The strength of the spheres of influence of the large neighbouring centres of Southend, Basildon and Chelmsford means that traffic is drawn through Rochford District’s own centres to them.” Both the Council and the highway authority seek to discourage non-local traffic on local routes for non-local reasons.
The airport is a key employment growth area. Hullbridge is the furthest residential area from the airport and the least accessible, so it is unlikely that new purchasers will be tempted to Hullbridge by the expectation of work at the airport.	Although the airport is a key employment hub in the District, the Council recognises that residents commute to other areas outside the District for work, such as Chelmsford and Basildon.
The proposed development will impact on residents beyond 2021. Development would generate works traffic which would impact on local highways and traffic congestion, noise, air quality and pedestrian/road safety. Roads/pavements should be kept clean, pollution should be continuous monitored, and working hours should be restricted. Restricted parking on some roads to enable works traffic access to the site would impact on residents.	Issues associated with works traffic will be addressed through conditions attached to a planning application.
Surface water pumps break down, for example at the junction of A127/A1245, causing traffic restrictions.	Noted.
Unpleasant odours from the nearby sewage plant are sometimes experienced in the area due to the prevailing wind. The proposed development is in proximity to the treatment works.	Anglian Water is responsible for the sewage treatment works in the District.

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<p>The existing sewage system in Hullbridge is inadequate and cannot cope with pumping the waste up Ferry Road to the Watery Lane Sewage works. Additional development would create sewage flooding along Watery Lane.</p>	<p>Anglian Water is responsible for the sewage treatment works in the District. Upgrades to the Rayleigh Waste Water Treatment Works are required in the Plan based on the findings of the Surface Water Management Plan (paragraph 3.184).</p>
<p>Development at SER1, BFR4 and SER6 would all need to contribute to improvements to improvements to Rayleigh Waste Water Treatment Works (WwTW).</p>	<p>The information in the Plan is based on the most up-to-date available. The Water Cycle Study 2011 notes that for the 'North of London Road, Rayleigh' (SER1), there is "sufficient volumetric capacity at Rayleigh West WwTW for the proposed growth" (page 130) for wastewater treatment, and for wastewater transmission, "it is probable that the sewer infrastructure will not need upgrading" (page 130).</p> <p>There is also "sufficient volumetric capacity at Rayleigh West WwTW for the proposed growth" (page 133) for wastewater treatment at Rawreth Industrial Estate, but "modelling will be required for the development proposal" (page 133) for wastewater transmission.</p> <p>For South West Hullbridge, whilst there is "sufficient volumetric capacity at Rayleigh West WwTW for the proposed growth" (page 132) for wastewater treatment, "Due to the large proportional increase in flow through the sewer network it is likely to require an upgrade" (page 132) for wastewater transmission.</p> <p>These differences are reflected in the plan. Anglian Water did not raise any specific concerns in relation to Rayleigh WwTW during the consultation.</p>
<p>The sewage system is already at or near capacity. The sewage plant needs improving.</p>	<p>Reference to wastewater (paragraph 3.184) is based on an assessment of wastewater infrastructure undertaken as part of the Surface Water Management Plan.</p>
<p>Although mentioned in the report, there is no assessment of sewage or surface water capacity. This should be undertaken prior to any</p>	<p>Surface water and wastewater capacity have been assessed as part of the</p>

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Issues Raised	Initial Officer Comments
development.	Surface Water Management Plan.
The proposed measures to address surface water will not be adequate.	Surface water measures would need to be adequate to accommodate potential surface water flooding. This would be determined at the planning application stage in conjunction with Essex County Council and the Environment Agency.
Any new development would need to ensure that the ditches running through and around the site remain and cannot be blocked up, or a sustainable drainage system is implemented to manage surface water.	SUDS are required to be approved and implemented alongside the proposed development as set out in the Plan (paragraph 3.183).
There is a sewage pumping station to the south west corner of the site which will need to be taken into account.	Comment noted.
Development at SER1 and BFR4 will add significantly to the pressures on flooding and waste water that the Anglian Water plant will need to tackle, yet the only requirement for SER1 developers is to develop a drainage strategy.	With regard to Rayleigh WwTW and development at SER1, SER6 and BFR4, see above. Anglian Water will be consulted at the planning application stage.
Anglian Water's role in the production of the LDF is reactive rather than proactive. The current waste water and sewage facilities are already insufficient and there is concern that it will become more inadequate before upgrading takes place. Development in Rayleigh and Hullbridge should not be considered in isolation.	With regard to wastewater transmission and treatment for development at SER1, SER6 and BFR4, see above. Anglian Water's comments during the first round of consultation, as well as the findings of the Water Cycle Study 2011 have informed the development of the Plan. Proposed development in Rayleigh and Hullbridge has not been considered in isolation.
There is concern regarding subsidence on unstable clay soil.	This would need to be explored and addressed at the planning application stage.

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Issues Raised	Initial Officer Comments
Ponds to storage excess water will impinge further on the Green Belt and should be discouraged as a method of control, in favour of a sustainable system.	Appropriate SUDS will be determined in consultation with the relevant bodies at the planning application stage.
Climate change should be taken into account.	The Surface Water Management Plan has taken climate change into account.
There are existing flooding issues. Developing this site will increase flooding as it currently absorbs the water. Drainage is at or near capacity; figures used were challenged by the Parish Council but no account has been taken of data provided which is more up to date.	<p>The site is not situated within a flood risk area as determined by the Environment Agency. However, paragraph 3.183 notes that localised surface water flooding along Watery Lane is an existing issue that needs to be addressed.</p> <p>The site would be required to accommodate appropriate SUDS, which will be determined in consultation with the relevant bodies at the planning application stage.</p> <p>It is unclear which figures were challenged by the Parish Council, but information relating to wastewater transmission and treatment, and drainage is based on the most up-to-date information available in the Water Cycle Study 2011 and Surface Water Management Plan 2012.</p>
Capacity should be assessed, and improvements made prior to development. Detailed costing should be provided to determine viability. It is unclear whether Anglian Water considers improvement works to be feasible/cost effective.	Improvements to surface water drainage and waste water capacity would be required to accompany development of this site. Anglian Water have been consulted during the Core Strategy and Allocations Document. Neither the Environment Agency nor Anglian Water raised any concerns in respect of this site.
Flood risk/flood zoning is based on insurance claims, but no claims have been made as the area is farmland.	<p>Flood risk is determined by the Environment Agency and is not based on insurance claims.</p> <p>Insurance is not a planning issue.</p>

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Issues Raised	Initial Officer Comments
Development is proposed on/in proximity to a flood plain (the southern end in particular floods). It is incorrectly shown outside of flood zone, as this area is constantly flooded. No flood risk assessment has been done for the site.	The site is not located on a flood plain/within a flood zone. Essex County Council is responsible for addressing the current issues with flooding along Watery Lane, and has recently undertaken a programme of ditch clearing to alleviate these issues. A strategic flood risk assessment has been prepared for the District in conjunction with other neighbouring Thames Gateway local authorities, however, a site specific flood risk assessment would be required to accompany a planning application for this site.
There should be input from the insurance industry to identify the insurability of the dwellings to be built on the site. Future flooding/insurance will be an issue for new dwellings.	Insurance is not a planning issue.
Tidal reflux in 3 rivers has effect on flooding which will affect Hockley and other areas upstream.	The Environment Agency has not raised any specific concerns in relation to this issue. This Plan has been [prepared taking into account the findings of the Surface Water Management Plan, the Water Cycle Study and the Strategic Flood Risk Assessment. Site-specific flood risk assessments will be required to accompany planning applications for the site identified.
Gardens/houses adjacent to the proposed area currently experience flooding.	Noted.
The site is below sea level so the tide impacts on drainage and surface water flooding. Watery Lane is below the water table/sea level.	Sustainable Drainage Systems (SUDS) are required to manage excess surface water from the site (paragraph 3.183).
The site is in proximity to the river Crouch. All local streams drain into the river Crouch but it 'backs up' at high tide.	Noted. Although there is existing development between the site and the river Crouch.
Building on greenfield land will increase flooding.	Sustainable Drainage Systems (SUDS) are required to manage excess surface water from the site (paragraph 3.183).
Although the proposed development is not on the flood plain, surface	Sustainable Drainage Systems (SUDS) are required to manage excess

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Issues Raised	Initial Officer Comments
flooding occurs regularly. The idea that is proposed to pump to holding tanks in Rawreth would create even more development and pumping into a little river is not an option.	surface water from the site (paragraph 3.183).
The topography of the area identified/run-off from the fields causes flooding along Watery Lane rather than from the river. The land slopes from Windermere Avenue to Watery Lane/Lower Road, and development would mean that facilities to manage surface water run-off would be required.	Sustainable Drainage Systems (SUDS) are required to manage excess surface water from the site (paragraph 3.183).
Flood defences along the stretch of the river between Battlesbridge and Hullbridge would need to be maintained.	Flood defences are the responsibility of the Environment Agency. The Shoreline Management Plan forms part of the evidence base for the Council's development plans.
Where would the swales be located?	The type of Sustainable Drainage Systems (SUDS) appropriate for the site would be determined in consultation with the Environment Agency and Essex County Council at the planning application stage. The location of SUDS would be detailed at this stage.
The proposed green buffer (paragraph 3.168) would not promote integration between the existing village and the site, or promote community cohesion. The proposed development should not form a separate community.	The proposed green buffer, consisting of trees and hedgerows as per paragraph 3.168, is not intended to prevent cohesion between new and existing development. Rather it is proposed to enhance the vista for both the new and existing developments and have a beneficial ecological impact.
Part of SER6b will be in Rawreth parish rather than Hullbridge. Residents would be represented by different Councillors. They will pay a Parish Precept to Rawreth but would use the facilities in Hullbridge. This would not promote community cohesion/integration. Parish and ward boundaries should be amended at the developer's expense.	The proposed development will form part of the village of Hullbridge.
The proposed development will create a separate village to Hullbridge. It	The proposed development will form part of the village of Hullbridge. The site is required to have at least two access/egress points are provided to serve

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Issues Raised	Initial Officer Comments
will have no road access.	SER6a and SER6b.
The development will be isolated from the existing community, and will use separate facilities.	The proposed development will form part of the village of Hullbridge. Any facilities provided within the existing development to support the community would be accessible to residents of both the existing and proposed development. Likewise, existing facilities in the village would be accessible to both.
Paragraph 3.167 states that the greenspace should be publicly accessible to residents of both phases of development. This is an example of the separation and lack of integration that runs through the document. All facilities should be accessible to the community as a whole, current and new residents, to build cohesion.	Greenspace provided within the existing development to support the community would be accessible to residents of both the existing and proposed development. Likewise, existing greenspace in the village would be accessible to both.
Where are the contributions to come from to provide the work proposed in 3.181?	A developer would be required to pay Essex County Council Highways directly for any highway improvements/requirements on-site, including for the local pedestrian/cycling and bridleway network, and would be required to pay contributions towards other off-site improvements through Section 106 agreements.
There should be more detail on open space.	The Plan does not seek to be overly prescriptive in terms of open space provision, however, it does specify minimum requirements, for example for natural/semi-natural greenspace within paragraph 3.167. Further detail will be provided at the planning application stage.
The need for youth facilities has not been assessed. Areas for youths should be provided within public open space. The existing youth centre is underused. Existing facilities such as the youth centre or the skate park should be invested in rather than providing new facilities. There are existing youth clubs including scouts and judo.	The Open Space Study 2009 assessed current provision of youth facilities including basketball areas, teen shelters, skateboarding areas and BMX tracks. It was not the remit of the study to consider other facilities such as youth clubs.

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Issues Raised	Initial Officer Comments
New play areas provided should be available to all residents.	Any new play areas provided within the existing development to support the community would be accessible to residents of both the existing and proposed development. Likewise, existing play areas in the village would be accessible to both.
Existing leisure facilities should be improved rather than provide additional ones.	Leisure uses are required to be provided alongside development of this site in accordance with the Core Strategy.
Unless there are developers are made to greatly enhance the very limited facilities for youths and provide quality new facilities, the anti-social behaviour and crime rate will soar.	<p>The Plan requires that a minimum of 0.02 hectares for outdoor youth facilities (paragraph 3.173) accompanies development of the site, based on the findings of the Open Space Study 2009.</p> <p>The Sustainable Community Strategy for Rochford District was produced by the Local Strategic Partnership (a partnership of key public, private and voluntary sector organisations) and gives all organisations a clear focus on what the priorities are in the District. These priorities include supporting the District's fostering greater community cohesion. The Sustainable Community Strategy notes there is a perception of anti-social behaviour and a fear of crime and disorder, a perception that the Local Strategic Partnership and its partners will help to address through greater community engagement and supporting community projects.</p>
Additional shops are not needed as the village has sufficient shops along Ferry Road, although there is limited parking. There are empty units. ASDA in Rawreth Lane has had a detrimental impact on the village's shops, and more shops would result in local shops closing down. A shuttle service from the new development to the shops should be provided. A needs assessment should be undertaken. There is a shortage of other business premises such as office or studio facilities. A swimming pool could be provided.	<p>The Plan proposes that neighbourhood shops (small-scale retail development) accompany the first phase of development (SER6a) having regard to viability. Viability would be determined at the planning application stage. As per Core Strategy Policy RTC2 and RTC3, small-scale retail development would be encouraged and supported provided it would not undermine the role of the District's town centres.</p> <p>Additional office uses will be directed towards proposed development at NEL1 in accordance with the Core Strategy Policy ED4 and the Employment</p>

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Issues Raised	Initial Officer Comments
	Land Study.
The current shopping facilities would not be able to accommodate an increase in population, and so more car journeys would be encouraged.	The Plan proposes that neighbourhood shops (small-scale retail development) accompany the first phase of development (SER6a) having regard to viability.
Some houses, particularly affordable homes, should be available to existing residents who want to stay within the village.	<p>There are three different types of affordable housing (social rented housing, affordable rented housing and intermediate affordable housing) as defined in the Core Strategy (paragraph 4.32).</p> <p>Social rented housing is allocated by the Council. Applicants for social rented housing are assigned a band (Band A to E) depending on their circumstances and application date.</p> <p>Priority is given to those applicants with the highest need, who have a local connection with the Rochford District and who do not have the financial resources to meet their housing costs.</p>
<p>Although the policy supposes that 35% of new properties would be “affordable”, the recent affordable housing survey suggested an affordable housing need in Hullbridge of 44 properties. The affordable housing element in Policy SER6 would represent more than 50% of the needs of the District.</p> <p>The requirement for 35% of the new dwellings to be 'affordable housing' is far too high. High concentrations of affordable housing bring social problems.</p>	<p>The Council has a duty to facilitate the delivery of affordable housing in the District. Policy H4 of the Core Strategy requires that 35% of dwellings on site are required to be affordable (unless demonstrated to be unviable/undeliverable).</p> <p>The 2010 Affordable Housing Viability Study found that a maximum of 35% affordable housing would be appropriate, unless demonstrated to be unviable.</p> <p>There are relatively low levels of social housing in the District and although the Council is continually working with housing associations to provide more accommodation, only a limited number of vacancies arise each year.</p>

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Issues Raised	Initial Officer Comments
As the term dwelling is used, it is unclear whether this refers to houses or flats.	A dwelling can refer to houses, bungalows, flats, maisonettes and/or bedsits.
Instead of the proposed development, the creation of a new town should be considered elsewhere.	This is a strategic issue which was considered during the preparation of the Core Strategy.
Other sites in the District should be allocated.	Other sites in the District are proposed to be allocated for residential development in accordance with the Core Strategy.
The river Crouch has over time become wider and shallower, as such the Coastal Protection Belt should be moved further away from the river bank, however, the Coastal Protection Belt is being moved closer to the river to permit development.	The purpose of the Coastal Protection Belt is to protect the undeveloped coastline of the rivers Crouch and Roach. There is already development to the north of the proposed site. The proposed Coastal Protection Belt boundary is set out in Policy ELA2 of the Plan. The Sustainability Appraisal (April 2013) notes that "Under any circumstances the site is bordered by the north by an area of existing development so the impact of the site on the Coastal Protection Belt will be minimal if any. The boundary of the Coastal Protection Belt in this area will need to be redrawn." (page 252).
The figures/data being used is out of date.	<p>The Allocations Document has been prepared using the most up-to-date information where available, for example the Surface Water Management Plan. The Plan has also been informed by the Strategic Housing Land Availability Assessment, in particular the 2012 Review.</p> <p>The housing numbers used in the Allocations Document accord to the Core Strategy, which themselves were contained in the East of England Plan (the Regional Spatial Strategy for the East of England that was withdrawn on 3 January 2013).</p>
Development of greenfield sites would destroy wildlife habitats. The green fields and hedgerows are the 'lungs' of the community it surrounds. The proposal is not environmentally sustainable.	The area to the South West of Hullbridge is not identified as being of ecological importance. However, any impact identified on wildlife habitats will be required to be addressed.

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Issues Raised	Initial Officer Comments
There will be a loss of amenity for existing residents, and construction will impact on quality of life.	Issues of amenity, and potential impact of construction on existing residents, will be considered in detail at the planning application stage.
Property values will depreciate.	This is not a planning issue.
There is a limited bus service and no train station. Rayleigh is the closest train station and is always full in the mornings; how will it cope with additional passengers? Public transport needs to be improved and be affordable. There should an improved service with longer/late hours to link to Basildon, Southend airport and Chelmsford. As 90% of new trips in Hullbridge are likely to be made by car, vehicle usage will increased.	<p>There are existing bus routes to Hullbridge.</p> <p>Public transport infrastructure improvements and service enhancements would be required to accompany development of this site (paragraph 3.158).</p>
<p>The Plan has not been adequately consulted upon, although it has been stated that the Council would do so. The Council has not consulted the Hullbridge Action Group or the Hullbridge Parish Plan Group, although it has done so for community groups in other areas. Residents did not receive letters about the proposal, and many are not aware of the proposals. The Council should not rely on people to make comments through the online system as not everyone has access to a computers/the internet. Proper consultation should be carried out. The consultation process should be started again by writing to residents in plain English and not by writing jargon in the free newsletter (Rochford District Matters).</p>	<p>The Council consulted all the statutory consultees, organisations, residents, landowners, developers and agents on our database, including any residents' associations/groups, who expressed a wish to be directly consulted on future planning policy or had previously commented during consultations.</p> <p>A resident representing the Hullbridge Action Group was registered in 2010, and commented on the Discussion and Consultation Document. They were contacted regarding the consultation on the Submission Document.</p> <p>The Hullbridge Village Community Group responded to the consultation.</p> <p>The Council recognises that not everyone has access to the internet (many consultees were invited to comment by letter) and paper copies of the document were available at local libraries and Council offices to view, or were available to be sent out on request.</p> <p>The Council does not rely on Rochford District Matters to advertise public consultations as set out in this statement.</p>

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Issues Raised	Initial Officer Comments
Proposed public open space for this site should be retained in perpetuity.	Existing and future public open space will be protected through the planning process.
There are not enough recreational facilities for the new community.	Public open space, play space, youth, community and leisure facilities are required to accompany development at SER6.
A large number of residents object to this Plan. A referendum for Hullbridge residents should be held before planning permission is granted.	The general location of South West Hullbridge for the allocation of 500 dwellings is set out in the adopted Core Strategy. Residents will be consulted further on the detail at the planning application stage, before permission is granted.
The key benefits of the proposal should be set out.	Comment noted.
Many issues raised by residents in earlier stages have not been addressed.	Issues raised in the previous consultation have been carefully considered, and officer's comments in response to these have been provided in Appendix 2. However, it is unclear which issues are believed not to have been addressed.
Any assessments carried out should be done independently for example drainage/roads.	<p>Drainage assessments including the Surface Water Management Plan 2012 and Water Cycle Study 2011 have been undertaken by consultants. These documents form part of the evidence base.</p> <p>In terms of roads, Essex County Council as the highways authority have been closely consulted throughout the process of the Core Strategy and the Allocations DPD and as such have considered the cumulative, and individual, impact of the developments across the District on the highway network. The consideration of potential sites has included views from the Highways Authority. This was done on an individual location basis and on a cumulative basis which assessed the impact of the cumulative development.</p>

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Issues Raised	Initial Officer Comments
<p>The field to the north west should be excluded from the proposed site (which is the same as Option SWH1), and an area to the south of Lower Road/east of Hullbridge Road (Call for Sites 17) should be included instead. The alternative site would still have the same benefits but would not extend as far west towards the floodplain.</p> <p>This site was 'screened in' in the evidence base for the Allocations Document and would create a more logical boundary. The site also includes white (part developed) land.</p>	<p>Inclusion of the land referred to as 'Call for Sites' 17 was considered at the Discussion and Consultation Document stage as part of Option SWH4. Although comments were made specifically in relation to this site at the Core Strategy Revised Preferred Options stage in December 2008 by the respondent, this was prior to the range of options set out in the 2010 Allocations DPD: Discussion and Consultation Document. In addition, no comments were submitted by the respondent to this effect during consultation on the Discussion and Consultation Document in 2010. This alternative option was also not suggested through the SHLAA consultation, the Allocations Discussion and Consultation SA (January 2012 and August 2012).</p> <p>This site was screened in in the Site Screening Report (September 2012) as it is located within the general location of South West Hullbridge, and assessed further in the Detailed Assessment of Potential Residential Site Options (September 2012). The small part of the site referred to as 'white (part developed) land' is actually designated within the 2006 Replacement Local Plan as residential. Both the greenfield and residential parts of the site have been assessed within the SHLAA 2012 Review.</p>
<p>Drainage and road improvements would be required, which Site 17 can provide as it incorporates much of the main surface water drainage route and the main relief drainage route, and is adjacent to the local highway network.</p> <p>The land can be developed swiftly by the land owner in conjunction with Swan Housing Association.</p>	<p>Although it is noted that this site contains a surface water drainage route, the proposed development would be required to incorporate appropriate SUDS to manage surface water.</p> <p>Road improvements can be delivered as part of SER6.</p> <p>Noted. However, affordable housing would be required to be delivered as part of the development of SER6.</p>
<p>Site 17 was only assessed as part of a wider option (SWH4) in the Discussion and Consultation Document SA. The configuration of this</p>	<p>Inclusion of the land referred to as 'Call for Sites' 17 was considered at the Discussion and Consultation Document stage as part of Option SWH4.</p>

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option was inappropriate and was not considered against reasonable alternatives (such as including Site 17 but excluding the field to the north west).	Although comments were made specifically in relation to this site at the Core Strategy Revised Preferred Options stage in December 2008 by the respondent, this was prior to the range of options set out in the 2010 Allocations DPD: Discussion and Consultation Document. In addition, no comments were submitted by the respondent to this effect during consultation on the Discussion and Consultation Document in 2010. This alternative option was also not suggested through the SHLAA consultation, the Allocations Discussion and Consultation SA (January 2012 and August 2012).
Paragraph 6.42 of the SA reasons that Option SWH4 would likely have a greater permanent, negative impact on landscape and townscape because it would weaken the defensibility of the Green Belt boundary. The Green Belt by its very nature is a protective mechanism. As such, this logic is flawed and unjustified.	Disagree. Paragraph 6.42 of the Updated Sustainability Appraisal (July 2012) concludes that: “Whilst Option SWH4 avoids this designation [the Coastal Protection Belt], the area directly north of this option is existing residential development and so would expose the field to the north of Malyons Farm (which is designated Coastal Protection Belt) to development pressure. Consequently the exclusion of the land to the north may weaken the defensibility of Green Belt boundaries in the locality and undermine the openness of the Green Belt on a wider scale.” (page 39).
Site 17 should be included as it would provide a clear and robust town boundary that would strengthen the Green Belt defensibility of Hullbridge.	The site identified in the Plan is considered to provide a robust and defensible Green Belt boundary in accordance with the NPPF.
Site 17 is well related to the local highway network and a bus route. Pedestrian links to local shops and facilities along Ferry Road can be improved.	This was considered as part of the detailed site assessment for all of the sites within this general location.

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Issues Raised	Initial Officer Comments
<p>The proposed development disregards priorities in the Sustainable Community Strategy (fostering greater community cohesion, keeping Rochford safe, and promoting a greener district).</p>	<p>As set out in the Plan, it will address the priorities set out in the Sustainable Community Strategy, primarily through the aiding the deliver of the Core Strategy (paragraph 1.26).</p> <p>The Plan seeks allocate land for a range of uses including housing, employment, open space, education and town centres.</p> <p>The adopted Core Strategy and the evidence base which supports it justifies why a small amount of Green Belt is required to be reallocated during the plan period. This is reflected in the allocations proposed in the Allocations Submission Document.</p> <p>Community cohesion and safety will be promoted through good design at the planning application stage.</p>
<p>This development would increase the number of cars and residents in Hullbridge.</p>	<p>The impact of development on the village has been considered throughout the preparation of the Core Strategy and the Allocations Document.</p> <p>The Council has prepared the Core Strategy and subsequently the Allocations Document in consultation with numerous infrastructure providers, including Essex County Council (highways, education, and public transport departments), Anglian Water, Environment Agency and the South East Essex Primary Care Trust.</p>
<p>Hullbridge does not have a Police Station or Fire Station. It is unclear whether the current policing arrangement is adequate. Given police crime statistics, population increase will result in an increase in crime, and reduce feelings of safety. A Police Station in Hullbridge may not be viable. Emergency services are already overstretched. How have the response times of emergency services been taken into account?</p>	<p>The Sustainable Community Strategy for Rochford District was produced by the Local Strategic Partnership (a partnership of key public, private and voluntary sector organisations) and gives all organisations a clear focus on what the priorities are in the District. These priorities include supporting the District's fostering greater community cohesion. The Sustainable Community Strategy notes there is a perception of anti-social behaviour and a fear of</p>

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As there has never been a traffic flow taken on the following roads at the same time, Hambro Hill, Down Hall Road, Hullbridge Road, Watery Lane, Ferry Road, Lower Road and as the congestion will affect the response times of Fire, Ambulance and Police. Have these services been consulted?	crime and disorder, a perception that the Local Strategic Partnership and its partners will help to address through greater community engagement and supporting community projects.
It will have a visual impact on the setting of the village, as the site is elevated above the surrounding roads and would have a significant impact on the approach from the west.	The topography and visual impact of the site has been carefully considered in the preparation of the Plan. It would have to be considered in further detail at the planning application stage.
The residents of Windermere Avenue and surrounding roads enjoy living in close proximity to the open countryside, which benefits from peace and quiet and the aesthetic views. This proposed development would destroy and lose the natural beauty of the fields and countryside.	<p>There is no legal right to an uninterrupted view of the countryside and the allocation of land within the Development Plan does not affect this. The development of new residential dwellings will require planning permission and, in considering applications, the Council will have regard to the impact of any proposals on the amenity of the occupiers of neighbouring homes, i.e. issues such as overlooking will be addressed through the planning application process.</p> <p>The potential visual impact of development on this proposed site has been considered during the preparation of the Allocations Document.</p> <p>Further evidence of consideration given to the effect on the rural nature of the area and visual impact of development is provided within Detailed Assessment of Potential Residential Site Options (September 2012).</p>
Only 10% of the energy required to power the proposed development will be needed from green sources.	This is in accordance with the Core Strategy (Policy ENV8).
The mix of dwellings (2-3 bed/4-5 bed) is not set out in the Plan. The dwelling provided will be family homes.	The tenure and mix of dwelling types would be refined at the planning application stage.

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Consideration should be given to long term impact on population. As the last large development in late 60's early 70's caused Hullbridge to make headlines in national newspaper (74) for having the highest birthrate in the country. Planning to maintain current community size by mixed housing single, elderly, family and luxury developments side by side as the current mix of the village.	The tenure and mix of dwelling types would be refined at the planning application stage.
Although the proposed development would follow the existing field boundaries, it is not considered that this would result in defensible boundary.	The proposed boundary follows physical features in accordance with the NPPF.
Although there is a need for more affordable housing in some areas, Hullbridge is too small for these plans.	The quantum of housing accords with the adopted Core Strategy. Policy H4 of the Core Strategy stipulates that 35% of dwellings on site are required to be affordable (unless demonstrated to be unviable/ undeliverable)
A very thorough and proper review of the area needs to be carried out, from the current proposals in the Plan; this clearly has not been done.	An assessment of the sites identified in this general location has been undertaken within Detailed Assessment of Potential Residential Site Options (September 2012).
The Plan should include a map detailing the proposed changes/improvements to local roads in relation to the two new developments, including where the access roads will be.	The precise details will be determined at the planning application stage.
The proposed boundaries are fully supported and provide a logical expansion to Hullbridge. In particular the proposed residential allocation SER6b is well related to the existing north and west development boundaries of Hullbridge and Hullbridge village centre. It will provide both a sustainable expansion to the village, which has a limited impact on the countryside.	Noted.
The land located immediately adjacent to the western boundary of	As the site in question has been submitted to the Council for consideration, it

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SER6b, which extends to the north and west of the village, should be allocated for residential development when the Core Strategy/Allocations Document are reviewed.	will be considered in the review of the Core Strategy.
This site is available and deliverable in the medium to longer term and the Council keep this in mind, particularly if allocated land is not deliverable in the Plan period.	Noted.
<p>SER6 is insufficient to supply all the housing and the necessary funding which will be required under any Section 106 agreement needed, to help provide the required infrastructure improvements.</p> <p>Site 17 should be included as part of SER6a. This site was 'screened in' in the evidence base for the Allocations Document. It contains the main surface water drainage route. The site also includes white (part developed) land.</p> <p>Most of Site 17 will be allocated Green Belt rather than agricultural land designated as SER6b.</p> <p>It would be grossly unfair and an injustice, if the Council/Planners at some future date, when implementing SER6 needed to secure Site 17 for supplementary infrastructure projects, without the economic support of some new housing development within the Site 17 drainage perimeter.</p>	<p>The proposed site identified in SER6 can meet the dwelling and infrastructure requirements in accordance with the Core Strategy. A Section 106 agreement would be determined at the planning application stage.</p> <p>This site was 'screened in' in the Site Screening Report (September 2012) as it is located within the general location of South West Hullbridge, and assessed further in the Detailed Assessment of Potential Residential Site Options (September 2012). The small part of the site referred to as 'white (part developed) land' is actually designated within the 2006 Replacement Local Plan as residential. Both the greenfield and residential parts of the site have been assessed within the SHLAA 2012 Review.</p> <p>Although it is noted that this site contains a surface water drainage route, the proposed development would be required to incorporate appropriate SUDS to manage surface water.</p> <p>Site 17 is predominantly grazing land with a small area of previously developed land which is located within the existing defined residential area. Both portions of the site have been included within the SHLAA 2012 Review.</p>
We are unable to find the reason for the Inspector's need to check the Legal Requirements of the Compulsory Purchase Act when there is no mention of possible Compulsory Purchase of the land or property in question in respect of the proposed development/s.	This statement is unclear.

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<p>Although the 'words' localism Act is stated in this paragraph, the due additional number (2011) and 'words' 'Chapter 20' is not indicated. Bear in mind that this 'Act' was not brought into force till 2011, the community would not have been aware of the policies which the community could take advantage of as the Core Strategy and Allocations DPD Documents were not published till 2009 and 2010 and 2011.</p>	<p>The Localism Bill received Royal Assent on 15 November 2011. The Core Strategy was adopted on 13 December 2011 and the Allocations Submission Document was consulted on between 29 November 2012 and 25 January 2013.</p>
<p>In view of this very important issue having some long lasting effect in the Hullbridge Community (specifically), we have referred to the Localism Act 2011 (chapter 20) the clauses referred to are as follows and applied generally to this whole representation:</p> <p>Community Rights to challenge - Part 5, Chapter 2, Clauses 81 to 86.</p> <p>Plans and Strategies - Part 6, Chapter 1, clauses 109 to 113.</p> <p>Neighbourhood Planning - Part 6, chapter 3, clauses 116 to 121.</p> <p>Consultation - Part 6, chapter 4, clause 122</p>	<p>Noted.</p>
<p>The existing infrastructure is inadequate to allow the necessary connections to any new development. Greater consideration should be given to this issue, and more information should be provided.</p>	<p>The Council has prepared the Core Strategy and subsequently the Allocations Document in consultation with numerous infrastructure providers, including Essex County Council (highways, education, and public transport departments), Anglian Water, Environment Agency and the South East Essex Primary Care Trust.</p>
<p>We are not convinced that the planning issues referred to generally satisfy the Planning requirements, in particular the preparatory and enabling infrastructure works necessary prior to any new development taking place, which should also include the necessary 'flood' defences and improvement of Watery Lane, therefore we request a new policy be added to the Discussion and Consultation document to allow discussion by the Hullbridge community, all in accordance with the policies</p>	<p>The policy within the Submission Document for Hullbridge includes appropriate reference to the need for infrastructure improvements. More detail will be provided at the planning application stage.</p>

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stipulated in the Localism Act 2011 as referred to above.	
The third item "delivery partners..." this seems to imply that a partnership has been formed between the RDC and A.N. Other. We are unable to find information in respect of this clause or policy.	It is unclear what this refers to. However, the Council has prepared the Core Strategy and subsequently the Allocations Document in consultation with numerous infrastructure providers, including Essex County Council (highways, education, and public transport departments), Anglian Water, Environment Agency and the South East Essex Primary Care Trust.
We request a Policy inserted in the Document explaining the whole meaning of this policy and if this partnership is now Legal Conformity.	It is unclear what this refers to.
With respect to "coherence with the strategies ..." we require a policy statement explaining if all neighbouring 'authorities' have been consulted and what the results are of this consultation.	It is unclear exactly what this refers to. However, neighbouring authorities have been consulted throughout the plan making process and their comments are available to view on the Council's online consultation system.
The items referred to in this presentation can imply reasons for a delay to allow further consultation, in view of new Government legislation which was not available at the time/s of formulation, i.e. the Localism Act 2011 Chapter 20.	The Localism Act was in place prior to the finalisation of the Submission Document.
<p>Representations made in respect of the 'Core Strategy Submission Document (with proposed minor amendments highlighted) September 2009 (amended September 2011)'. These specifically relate to Hullbridge and the issue of flooding as follows:</p> <ul style="list-style-type: none"> • Development costs will have to take into account deep piling foundations due to the flood terrain in the whole designated new development area of Hullbridge (Site SWH1- see page 34). • A policy should be inserted into the LDF Document that the Environment Agency is consulted and to confirm that adequate measures will be taken to develop flood defences in the vicinity of 	<p>It is noted that this representation does not relate directly to the Allocations Submission Document.</p> <p>This would be considered at the planning application stage.</p> <p>The Environment Agency has been consulted on the proposals in the Allocations Submission Document, but do not raise specific concerns in relating to flood defences or flood risk for Hullbridge. The Environment</p>

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<p>this development in Hullbridge prior to any housing development taking place.</p> <ul style="list-style-type: none"> The flood defences construction should include flood relief measures in Watery Lane and surrounding area, with adequate drainage facilities to remove surface water to a 'reservoir' or suitable 'collection point', and to upgrade the existing drainage system. We require a new policy be inserted in the LDF Document to address this 'flood' area, by consulting with the Insurance industry in respect of properties being built in this green belt land. In view of the statement made in the 'introduction pages' in respect of entering into 'Partnership' (refer to page 3-'effective') we consider it is imperative that a policy to this effect should be inserted in the LDF Document to make it clear that all insurance aspects have been considered, what the risks are likely to be, and what the implications will be to the cost and sale/rent prices of the properties in the new development area. We request a further policy to address the Legal arguments in relation to the above. 	<p>Agency will be consulted at the planning application stage.</p> <p>The site is not situated within a flood risk area as determined by the Environment Agency. However, paragraph 3.183 notes that localised surface water flooding along Watery Lane is an existing issue that needs to be addressed. The site would be required to accommodate appropriate SUDS, which will be determined in consultation with the relevant bodies at the planning application stage.</p> <p>As noted above the identified site is not situated within a flood risk area as determined by the Environment Agency.</p> <p>Insurance and property values are not planning issues.</p> <p>See above.</p>
<p>Representations made in respect of the 'Core Strategy Submission Document (with proposed minor amendments highlighted) September 2009 (amended September 2011)'. These specifically relate to Hullbridge and Watery Lane as follows:</p> <ul style="list-style-type: none"> This lane has always been susceptible to flood, causing severe traffic congestion that use this lane every rush hour with or without warning 	<p>It is noted that this representation does not relate directly to the Allocations Submission Document.</p> <p>Paragraph 3.183 notes that localised surface water flooding along Watery</p>

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<p>notices being in place, used as a short cut to the A130 and/or detour to surrounding main roads, the records from the River and Environment Authority must bear witness.</p> <ul style="list-style-type: none"> • This lane is inadequate for traffic, is subject to weight restrictions, width restrictions and weak bridges. The Satellite Navigation system directs all traffic through Watery Lane. • There is no mention in any of the documents that Watery Lane should be a 'priority' improvement, as a main access road to and from Hullbridge. This road should be converted to 'Road' status allowing for extensive improvement and to allow access to the new development. • We request a policy be included in the LDF Core Strategy Document in this respect. 	<p>Lane is an existing issue that needs to be addressed.</p> <p>Local highway capacity and infrastructure improvements including improvements to Watery Lane and Watery Lane/Hullbridge Road junction are required to accompany development of the site, as set out in the Plan.</p> <p>Local highway capacity and infrastructure improvements including improvements to Watery Lane and Watery Lane/Hullbridge Road junction are required to accompany development of the site, as set out in the Plan.</p> <p>See above.</p>
<p>Representations made in respect of the 'Core Strategy Submission Document (with proposed minor amendments highlighted) September 2009 (amended September 2011)'. These specifically relate to Hullbridge and drainage as follows:</p> <ul style="list-style-type: none"> • We are not confident with your statement made on page 34 of the Allocations DPD (LDF) February 2010 document which states specifically that, 'The Core Strategy Submission Document requires that the following infrastructure is implemented alongside any development in this location: local highway capacity and infrastructure improvements, public transport infrastructure and service improvements, enhancements and links to pedestrian, cycle and bridle network, and (A) Sustainable Urban Drainage Systems all of which this site has the capacity to provide. (B) The site would afford good opportunities for the creation of a strong defensible 	<p>It is noted that this representation does not relate directly to the Allocations Submission Document.</p> <p>These requirements were set out in the Discussion and Consultation Document, in accordance with the adopted Core Strategy.</p>

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<p>Green Belt boundary.</p> <ul style="list-style-type: none"> We submit that the highlighted sections of the above statement (A) should be changed to state that the preparatory and enabling drainage works be completed prior to any new development, to allow adequate connections to the existing drainage system of the Hullbridge site, and (B) if the existing Green Belt has been encroached now, how can we be certain that this will not be repeated in the future. We require amendments to this policy to confirm that no encroachment will take place in the future of the green belt land, the changes required to this policy are consistent with the policies stated in the Localism Act as referred to above. 	<p>Surface water drainage has been considered in the Plan.</p> <p>The identified area for residential development would meet dwelling and infrastructure requirements during the plan period.</p> <p>However, it should be noted that the Council is committed to an early review of the Core Strategy, which would likely comprise those site identified in Core Strategy Policy H3 (this includes the second phase of development to the South West of Hullbridge – SER6b).</p>
<p>Representations made in respect of the 'Core Strategy Submission Document (with proposed minor amendments highlighted) September 2009 (amended September 2011)'. These specifically relate to Hullbridge and roads/pathways as follows:</p> <ul style="list-style-type: none"> The existing roads, particularly Malyons Lane and Windermere Avenue, which are being put forward to be the access roads to the new development we maintain are inadequate for this purpose. Both these roads need improvement to a much higher standard to allow the increase in vehicular traffic which will emanate from the 500 unit development (some 1000 vehicles). Proper drainage system must be constructed to accommodate the distribution of the surface water. 	<p>It is noted that this representation does not relate directly to the Allocations Submission Document.</p> <p>It is noted that the roads would need to be up to Essex County Council Highways approved standards before they are adopted, if they are to be adopted.</p> <p>The site would be required to accommodate appropriate SUDS, which will be determined in consultation with the relevant bodies at the planning application stage.</p>

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<ul style="list-style-type: none"> Standard pathways to be constructed to improve the environment and safety of the community, present state of pathways are inadequate. The walkways on Ferry road have long been in need of extensive improvement, the uneven surfaces are plain to see. We request that the RDC review the strategy for the short, medium and long term to satisfy the needs of Hullbridge, and change the policy statement to state that preparatory and enabling works be done in advance of the commencement of the development. 	<p>This is an Essex County Council Highways issue.</p> <p>This statement is unclear.</p>
<p>Representations made in respect of the 'Core Strategy Submission Document (with proposed minor amendments highlighted) September 2009 (amended September 2011)'. These specifically relate to Hullbridge and access roads as follows:</p> <ul style="list-style-type: none"> As stated above, Malyons Lane and Windermere Avenue are designated as access roads to the new estate which will be inadequate for purpose at present. Road lighting must be improved to the existing network prior to any further development taking place. We would like an amendment to the existing statements in respect of roads and to include additional/alternative routes to the new development to eradicate possible blockage of vehicular traffic access, preferably via Watery Lane, which will allow Watery Lane to be upgraded to 'road' status, thereby alleviating any congestion or other problems to occur in the future. 	<p>It is noted that this representation does not relate directly to the Allocations Submission Document.</p> <p>This would be considered at the planning application stage, if appropriate.</p> <p>At least two vehicular access/egress points would be required. Local highway capacity and infrastructure improvements including improvements to Watery Lane and Watery Lane/Hullbridge Road junction are required to accompany development of the site, as set out in the Plan. This would be determined in detail at the planning application stage.</p>
<p>Representations made in respect of the 'Core Strategy Submission Document (with proposed minor amendments highlighted) September 2009 (amended September 2011)'. These specifically relate to Hullbridge and services as follows:</p>	<p>It is noted that this representation does not relate directly to the Allocations Submission Document.</p>

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<ul style="list-style-type: none"> Water, electric, gas and general communication networks improvements must be made to the existing network prior to new developments to allow connection from the new development. The existing services require improvement and preparatory works should be done to accommodate future housing development. We have not been advised of the preparation and enabling works necessary for all the existing services, including consultation with existing facilities and services such as Medical, Educational, Environment, flood containment, transport and highways agency for the proposed development in Hullbridge. We request a new policy should provide for a programme of Preparatory and Enabling works be stated in the Local Development Framework Document. 	<p>The Council has prepared the Core Strategy and subsequently the Allocations Document in consultation with numerous infrastructure providers, including Essex County Council (highways, education, and public transport departments), Anglian Water, Environment Agency and the South East Essex Primary Care Trust.</p> <p>Any improvements to existing and future networks would need to be considered at the planning application stage. Such improvements would likely be funded through Section 106 contributions or Community Infrastructure Levy (CIL) payments.</p> <p>See above.</p>
<p>Representations made in respect of the 'Core Strategy Submission Document (with proposed minor amendments highlighted) September 2009 (amended September 2011)' and the Allocations DPD: Discussion and Consultation Document (February 2010). These specifically relate to Hullbridge and the density of SWH1 as follows:</p> <ul style="list-style-type: none"> Area allocation SWH1- Appendix 2, Schedule of site areas indicates 22 Hectares for Hullbridge area. And the policy statement in the LDF / Allocations DPD Document, with particular reference to Option SW1 on page 34, specifically states that "The Core Strategy Submission Document requires that the following infrastructure is implemented alongside any development in this location". 	<p>It is noted that this representation does not relate directly to the Allocations Submission Document.</p> <p>This comment relates to the table in Appendix 2 and Option SWH1 of the Discussion and Consultation Document.</p>

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<ul style="list-style-type: none"> We are not confident with your statement within that paragraph that "this site has the capacity to provide", and no confidence that the existing services are able to contain additional capacity to allow connection from any new development, without the existing infrastructure improvements in preparation for the additional population. We are not confident that your calculations for the proposed development has taken into consideration the impact of the 500 unit development on the existing number of units (3100) and the percentage this represents, approximately 16% , with the corresponding impact this will have on the existing community of some 7300 which will increase by approximately 2000 residents (500 x 4 persons per property) = 27% over existing population. Page 34 of the LDF Allocations DPD Discussion and Consultation Document February 2010, states that this area of green belt land is required for A) 500 dwellings, B) Public open space, C) play space and D) Youth, leisure and community facilities. We are unable to find a space distribution schedule to allow for all the items mentioned above, and we cannot find any information which provides the density for dwellings per hectare. However, we set out a mathematical exercise to determine the use of 22 hectares as follows: <ul style="list-style-type: none"> A. 500 Dwellings = say 85% x 22 Hectares = 18.70 Ha B. Public open space = say 7.5% x 22 Ha = 1.65 Ha C. Play space = say 5% x 22 Ha = 1.10 Ha 	<p>It is assumed that this relates to the paragraph about the infrastructure required to accompany development of Option SWH1 and specifically the sentence ending "...all of which this site has the capacity to provide" in the Discussion and Consultation Document (page 34).</p> <p>The Council has prepared the Core Strategy and subsequently the Allocations Document in consultation with numerous infrastructure providers, including Essex County Council (highways, education, and public transport departments), Anglian Water, Environment Agency and the South East Essex Primary Care Trust.</p> <p>This comment relates to Option SWH1 of the Discussion and Consultation Document.</p> <p>This would be determined at the planning application stage.</p> <p>Noted, however, the site identified as SER6 is 23.4 hectares as set out in the Allocations Submission Document.</p>

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<p>D. Youth, leisure facilities = say 2.5% x 22 Ha = 0.55 Ha</p> <p>Total distribution of space = 22.00 Ha</p> <ul style="list-style-type: none"> The requirement is that 35% of the proposed dwellings need to be 'affordable units' which may be 2 to 3 story units (175 flats), therefore 500 less 175 = 325 units may be low level homes (2 floors) and 175 units may be built within high level development (3 to 4 storey). The calculations are interpreted thus: 325 dwellings (low rise) to be built on 13.09 Ha 175 dwellings (high rise) to be built on 5.61 Ha Total hectares = 18.70 Ha We are concerned that the density in accordance with the exercise given above will be much greater than what would be considered normal in rural areas. There is concern on the impact of such a density and will impact on congestion and affordability (freehold or rent) and may have a divisive community affect where the new will be compared with the older properties, human nature will take its course and cause problems for the future. In terms of area allocation as described in the Allocation DPD LDF Document February 2010, Appendix 2, Schedule of site areas , Hullbridge reference SWH1 is placed tenth for the number of dwellings to be built, of a total number of 37 sites and is 'high' in encroachment of 'Green Belt area'. 	<p>The 35% requirement for affordable housing is set out in Core Strategy Policy H4. However, the precise provision, and the tenure and mix of dwelling types would be determined at the planning application stage.</p> <p>Noted, see above.</p> <p>The appropriate density for the proposed development site will be determined at the planning application stage. In addition, the SER6 is split into two phases of development, and the Plan proposes that infrastructure such as youth, community and leisure facilities accompany the first phase of development (SER6a), and as such it is unlikely that density would be uniform across the site.</p> <p>This comment relates to the table in Appendix 2 and Option SWH1 of the Discussion and Consultation Document. However, it is assumed that this means that the Option SWH1 is the tenth largest allocation option set out in the table, alongside the other options for South West Hullbridge as well as the other general locations.</p>

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<p>Representations made in respect of the 'Core Strategy Submission Document (with proposed minor amendments highlighted) September 2009 (amended September 2011)'. These specifically relate to Hullbridge and employment as follows:</p> <ul style="list-style-type: none"> With respect to employment, it may be advisable to include a policy to ensure that employment be given to suitable residents, knowing that if this development takes place our community can have the benefits from this project. 	<p>It is noted that this representation does not relate directly to the Allocations Submission Document.</p> <p>The provision of employment land has been considered in conjunction with housing delivery.</p>
<p>Representations made in respect of the 'Core Strategy Submission Document (with proposed minor amendments highlighted) September 2009 (amended September 2011)'. These specifically relate to Hullbridge and the Green Belt as follows:</p> <ul style="list-style-type: none"> After the said use, subject to any Compulsory Purchase Order which may be necessary for any reason, that the policy suggests that the remaining Green Belt in this area will be strengthened in safeguards, the same policy existed before the encroachment of this Green Belt land but RDC were able to find a way of over-riding that policy, how can the RDC convince the community of Hullbridge that the same may not occur in the future. 	<p>It is noted that this representation does not relate directly to the Allocations Submission Document.</p> <p>The need for the release of Green Belt land to accommodate housing needs has been justified in the adopted Core Strategy.</p> <p>As above, it should be noted that the Council is committed to an early review of the Core Strategy, which would likely comprise those site identified in Core Strategy Policy H3 (this includes the second phase of development to the South West of Hullbridge – SER6b).</p>
<p>Representations made in respect of the 'Core Strategy Submission Document (with proposed minor amendments highlighted) September 2009 (amended September 2011)'. These are as follows:</p> <ul style="list-style-type: none"> We consider the whole question of development in this area needs reviewing and all the necessary institutions should be consulted including the Insurance industry, Legal profession, Highways agencies and the companies supplying the services (we need 	<p>It is noted that this representation does not relate directly to the Allocations Submission Document.</p> <p>The proposed development site accords with the general location of South West Hullbridge identified in the adopted Core Strategy.</p> <p>The Council has prepared the Core Strategy and subsequently the Allocations Document in consultation with numerous infrastructure providers,</p>

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<p>satisfaction that the 'capacity' for all services are in place to connect to the new development), if not arrangements will be made through the planning authorities to provide additional services.</p> <ul style="list-style-type: none"> We consider this 'additional' policy will be extremely important for the satisfactory delivery of the new dwellings, and to satisfy the policies stated in the Localism Act 2011. 	<p>including Essex County Council (highways, education, and public transport departments), Anglian Water, Environment Agency and the South East Essex Primary Care Trust.</p>
<p>Representations made in respect of the 'Core Strategy Submission Document (with proposed minor amendments highlighted) September 2009 (amended September 2011)'. These specifically relate to Hullbridge and affordable housing as follows:</p> <ul style="list-style-type: none"> In view of the difficult building development situation due to the flooding aspects of this area, including 'Watery Lane', environmental issues as mentioned on page 3 under 'infrastructure preparatory and enabling works' it is very difficult to believe the evaluation of 80% of the market rent or sale price will be achievable, given that there is great doubt that the properties would be adequately insurable. The building costs with the proper safeguards against flood will make the rent or purchase prices out of reach with the present problems of gaining mortgages, we are not confident that Insurance Companies will be able to provide 'reasonable' comprehensive insurance premiums. We are unable to find a policy that provides information about risk assessments and analysis, having been made to include the flood defences, and a comparison schedule of possible environmental changes that have been predicted for the foreseeable future. 	<p>It is noted that this representation does not relate directly to the Allocations Submission Document.</p> <p>Measures to address existing surface water flooding issues will accompany development of the site as set out in Policy SER6.</p> <p>Insurance and property values are not planning issues.</p> <p>The site is not situated within a flood risk area as determined by the Environment Agency. However, paragraph 3.183 notes that localised surface water flooding along Watery Lane is an existing issue that needs to be addressed. The site would be required to accommodate appropriate SUDS, which will be determined in consultation with the relevant bodies at the</p>

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<ul style="list-style-type: none"> We respectfully request this policy is reviewed and the Hullbridge community are consulted in accordance with the policies stated in the Localism Act 2011 referred to on page 2 of this submission. 	<p>planning application stage.</p> <p>The local community has been consulted as set out in this Consultation Statement.</p>
<p>Representations made in respect of the 'Core Strategy Submission Document (with proposed minor amendments highlighted) September 2009 (amended September 2011)', on the following:</p> <ul style="list-style-type: none"> Schedule of changes LAA2 Priority 3. Provision of Gypsy and Traveller sites (Policy H7) Strategic Market Housing Assessments Environment and flooding East of England Plan revocation and housing numbers Distribution of dwellings (brownfield/white/Green Belt land) Affordable housing viability 	<p>It is noted that this representation does not relate directly to the Allocations Submission Document.</p>
<p>Representations made in respect of the 'Core Strategy Submission Document (with proposed minor amendments highlighted) September 2009 (amended September 2011)', as follows:</p> <ul style="list-style-type: none"> We are unable to find any references to 'Risk assessment' for flood, the environment, infrastructure, Watery Lane, density, drainage, main services, roads, access- (e.g. to and from Hullbridge), schools, medical services, public services including fire, police, health and safety, employment, local financial economy, commercial and industrial development. 	<p>It is noted that this representation does not relate directly to the Allocations Submission Document.</p> <p>The Council has prepared the Core Strategy and subsequently the Allocations Document in consultation with numerous infrastructure providers, including Essex County Council (highways, education, and public transport departments), Anglian Water, Environment Agency and the South East Essex Primary Care Trust.</p> <p>Detailed design of any development will be determined at the planning application stage.</p>

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<ul style="list-style-type: none"> Please explain how 'investment' can be attracted in this area, and how a domestic development will have the capacity to attract 'investment'. We have searched the two documents for a statement that there will not be another review to build new homes before 2031, we request such a statement be included in the main document. 	<p>The Council has considered the delivery of employment land and jobs in conjunction with housing throughout the preparation of documents which form the development plan for the District, including the Core Strategy, the Allocations Document, and the Area Action Plans for the District's three town centres and London Southend Airport and its surrounding area.</p> <p>The Council is committed to an early review of the Core Strategy, which would likely comprise those site identified in Core Strategy Policy H3 (this includes the second phase of development to the South West of Hullbridge – SER6b).</p>
<p>Concern regarding the increase in council tax for residents due to the number of extra facilities, services and changes required for this proposal.</p>	<p>The infrastructure required to accompany development of this site would need to be funded by developers.</p> <p>The Council has prepared the Core Strategy and subsequently the Allocations Document in consultation with numerous infrastructure providers, including Essex County Council (highways, education, and public transport departments), Anglian Water, Environment Agency and the South East Essex Primary Care Trust.</p>
<p>The Local Authority have not demonstrated that they have shown to have provided independent examination of the issues surrounding the infrastructure, S20(5)(a) Compulsory Purchase Act 2004.</p>	<p>The Council has prepared the Core Strategy and subsequently the Allocations Document in consultation with numerous infrastructure providers, including Essex County Council (highways, education, and public transport departments), Anglian Water, Environment Agency and the South East Essex Primary Care Trust.</p> <p>Specific documents form part of the evidence base for the Plan, including the Water Cycle Study and Surface Water Management Plan.</p>
<p>I cannot see from the Local Authority website that a Sustainability Appraisal Report has been undertaken.</p>	<p>The Sustainability Appraisal was available on the website during the consultation on the Submission Document.</p>

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Issues Raised	Initial Officer Comments
<p>With regard to preparing the plan positively, this has not been demonstrated as any development in the Hullbridge area is not sustainable because of the lack of infrastructure.</p>	<p>Disagree. The Plan has been positively prepared through the allocation land for housing, employment, education, open space and other land uses.</p> <p>In addition the allocations accord with the Core Strategy and are supported by Sustainability Appraisal.</p>
<p>The Local Authority must show credible evidence as to improvements to the infrastructure.</p>	<p>The Allocations Submission Document sets out the infrastructure requirements to accompany development of the site. The details will be determined at the planning application stage.</p>
<p>It was questioned when the public consultation took place in respect of amending the Green Belt and planning policy.</p>	<p>Consultation on the Allocations Submission Document so which this comment relates took place between 29 November 2012 and 25 January 2013.</p>
<p>The proposed development would be contrary to the Council's Green Belt policies, if public consultation has not taken place.</p>	<p>Consultation on the Allocations Submission Document so which this comment relates took place between 29 November 2012 and 25 January 2013.</p>
<p>Outline planning permission should not be granted for the site.</p>	<p>Outline planning permission has not yet been sought for the site identified in the Allocations Submission Document (Policy SER6).</p>
<p>Not enough research has taken place and the full environmental impact assessment has not been properly addressed.</p>	<p>Appropriate sites within the general location of South West Hullbridge have been assessed in depth within the SHLAA 2012 Review and the Detailed Assessment of Potential Residential Site Options (September 2012).</p> <p>In addition, a Sustainability Appraisal and a Habitats Regulations Assessment of the Plan has been undertaken.</p> <p>An Environmental Impact Assessment (EIA) will be required to accompany any planning application for this site in accordance with legislation.</p>

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Issues Raised	Initial Officer Comments
Support for the identification of the site.	Support noted.
In relation to paragraph 3.163, we have objected to the artificial constraint of 5% flexibility, as site conditions, capacities, density and other opportunities and constraints have yet to be fully informed by a master plan.	<p>The 5% cap is considered to be appropriate to ensure that the minimum amount of Green Belt land, as set out in the Plan, is released to meet need.</p> <p>The Plan has inbuilt flexibility to ensure that sites identified later in the plan period can be brought forward if necessary to meet shortfall earlier in the plan period. In addition housing supply is also made up of windfall sites which will be monitored through the Annual Monitoring Report.</p>
There should be a hard line on a plan for pre and post 2021 development on Figure 12, as any phasing should be informed by site opportunities and constraints, and by the master plan approach set out in the point above. The plan itself may introduce an additional constraint to the proper delivery of the site in addition to those identified above, and should be replaced with something simpler.	<p>It is appropriate to identify the area of development which is proposed to be delivered between 2015 and 2021, and subsequently the part of the site that will be safeguarded until post-2021, to ensure that the minimum amount of Green Belt necessary is released as required.</p> <p>The Concept Statement relates to the two distinct phases of development, however, detailed design of the development will be determined at the planning application stage.</p>
We do not disagree with the need for appropriate open space provision. However the green and play space areas identified in paragraphs 3.167 to 3.169 have not been justified by separate analysis and should be the subject of explanation within the text.	The open space provision set out in paragraph 3.167 to 3.169 is based on the Open Space Study 2009.
In paragraph 3.172 it states that the exact nature of community facilities will be the subject of agreement with the Council at the appropriate time, yet paragraph 3.173 establishes a minimum area. As with green and play spaces, this either needs specific justification, or removal to be discussed at the appropriate time.	This is incorrect. The site is required to provide youth, community and leisure facilities. Community facilities will be determined at the planning application stage as set out in paragraph 3.172, and the requirement for youth facilities is calculated based on the findings of the Open Space Study 2009.
We would also make the point in relation to the front-end provision of	Youth, community and leisure facilities are required, as set out in paragraph

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Issues Raised	Initial Officer Comments
<p>open spaces and facilities that this effectively pre-judges the most appropriate location for such facilities within the development to meet the needs of future residents, and this should both be derived as the consequence from the master plan approach suggested above, yet to be undertaken, and provides further justification for not fixing a line on a plan which formalises the locations of phases SER6a and b.</p>	<p>3.171, to be provided within the first phase of the development (SER6a). This would ensure that such facilities are accessible to the residents of the development as well as existing residents in the village. However, the Plan does not stipulate the appropriate location for these facilities within the first phase. Nor does the Plan identify where greenspace should be located, although it does require that provision is well-integrated into the development. It also requires it to be accessible for residents of both phases of development (paragraph 3.167).</p>
<p>In paragraph 3.176, the retail requirement should be reworded to state there is a possibility it could be investigated rather than a requirement, given that a fundamental part of our case to the Core Strategy was that this scheme would assist in anchoring existing town centre shops, which are undertrading.</p>	<p>The Plan proposes that neighbourhood shops (small-scale retail development) accompany the first phase of development (SER6a) having regard to viability. Viability would be determined at the planning application stage. As per Core Strategy Policy RTC2 and RTC3, small-scale retail development would be encouraged and supported provided it would not undermine the role of the District's town centres.</p>
<p>No objection to the transport statement (paragraph 3.177), however, as it will be a requirement of the planning application in any case, it is questioned why it is referred to here.</p>	<p>The highway authority did not raise any objections to the inclusion of reference to a transport assessment within the policy.</p>
<p>In paragraph 3.182, the reference to Malyons Lane as a preference for an access should be removed as this is a matter that should be explored through detailed masterplanning and detailed public consultation.</p>	<p>At least two access/egress points would be needed to serve the proposed development, as advised by Essex County Council. The most appropriate road to connect the site to the village would be determined at the planning application stage. All other roads to the east of the site would provide pedestrian access to enhance community cohesion.</p>
<p>It appears that the Council are confusing the transmission network and the treatment facility (paragraphs 3.184 and 3.185).</p>	<p>The Water Cycle Study notes that this site "drains to Rayleigh West WwTW via a combined sewer network. Due to the large proportional increase in flow</p>

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Issues Raised	Initial Officer Comments
<p>There are two wastewater treatment works (WwTW); Rayleigh West and Rayleigh East. The sewers crossing SER6 (which will be discharge into) drain to Rayleigh West WwTW which, according to the Council's evidence base (specifically the September 2011 Water Cycle Study), has adequate capacity to accept and treat the additional flows arising from the proposed level of growth. Furthermore our pre-development enquiry with Anglian Water back in 2010 indicated that the existing sewers crossing our site (transmission network) have sufficient capacity to accommodate the flow from the proposed development.</p>	<p>through the sewer network it is likely to require an upgrade.” (page 132). This is reflected in the Allocations Document with reference to an upgrade to the transmission network to Rayleigh WwTW being likely to be required prior to development.</p>
<p>Part of the land is or was used for farming.</p>	<p>Noted. This site is grade 3 agricultural land.</p>
<p>An alternative site should be considered and allocated.</p>	<p>Reasonable alternatives in this general location have been considered in the preparation of the Plan, as set out in the Detailed Assessment of Potential Residential Site Options (September 2012).</p>
<p>Infill/brownfield sites should be developed to enable new residents to be integrated.</p>	<p>Brownfield sites within the existing residential area have been considered in the SHLAA 2012 Review. However, any sites that come forward unexpectedly will be considered as windfall sites. The housing supply will be monitored through the Annual Monitoring Report.</p>
<p>The proposed development site is at the bottom of my garden, but I have not been informed as to what is going to be built.</p>	<p>This is set out in the Plan. The detail will be determined at the planning application stage.</p>
<p>Developers and land owners are making money at the expense of Hullbridge residents. Financial consideration and funding and the burden to the taxpayers needs to be taken into consideration before this project continues.</p>	<p>The Allocations Document allocates land in Hullbridge to deliver housing development, and accompanying development and infrastructure, to meet housing need and the requirements of the Core Strategy. The Allocations Document includes policies to ensure the land allocated is developed in a sustainable manner which protects existing residents' amenity.</p>
<p>The timescales contradict other reports – is development to come</p>	<p>As set out in both the adopted Core Strategy and the Allocations Submission</p>

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Issues Raised	Initial Officer Comments
forward in 2015 or 2021?	Document, the first phase of development is planned to be delivered between 2015 and 2021 and the second phase is to be delivered post 2021.
There is no current Sustrans network and none are planned. The nature of the roads would mean large scale land purchase would be required.	<p>The Sustrans route is an aspiration to be delivered during the plan period, as identified on the Key Diagram in the adopted Core Strategy.</p> <p>Officers are seeking to refine an appropriate Sustrans route in conjunction with Sustrans and Essex County Council.</p>
<p>It is unlikely that vehicle movements can be mitigated through a viable Sustrans route before the end of the decade since:</p> <ul style="list-style-type: none"> (i) Westbound, Watery Lane cannot meet minimum requirements for a Sustrans route (ii) Eastbound, a Sustrans route along Lower Road is probably not achievable because of its layout, which would prejudice any direct route towards the airport, and (iii) Southbound, there is scope for a route along Hullbridge Road, although it would require some land purchase as well as political will. Such a route would only go partway to Rayleigh, the most likely destination. 	Officers are seeking to refine an appropriate Sustrans route in conjunction with Sustrans and Essex County Council.
Bullwood Hall Prison should be considered as this is an area that is available for development without flooding issues.	This site is located in the Green Belt, and was in use until March 2013.
The policy is inconsistent with community cohesion as it is written in terms of a standalone development sitting adjacent to the main residential community in Hullbridge, and calls for community enhancements for that specific site that are inconsistent with the needs of Hullbridge as a whole.	The infrastructure requirements for the site are set out in the adopted Core Strategy, including open space, youth and community facilities. Such facilities would be accessible for existing residents and new residents, as the Plan requires them to be provided during the first phase of development (SER6a).

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Issues Raised	Initial Officer Comments
<p>SER6 is not legally compliant because:</p> <p>(i) It has been prepared without proper consultation with local groups as was set out in the Statement of Community Involvement</p> <p>(ii) In particular, the Council has failed to carry out the extensive consultation in respect of Hullbridge, as was later set out in the Core Strategy document.</p>	<p>The Council consulted all the statutory consultees, organisations, residents, landowners, developers and agents on our database, including any residents' associations/groups, who expressed a wish to be directly consulted on future planning policy or had previously commented during consultations.</p> <p>A resident representing the Hullbridge Action Group was registered in 2010, and commented on the Discussion and Consultation Document. They were contacted regarding the consultation on the Submission Document.</p> <p>The Hullbridge Village Community Group responded to the consultation.</p> <p>Community engagement and consultation has been undertaken as set out in this document.</p>
<p>SER6a cannot be delivered in the timescales set out because:</p> <p>(i) the policy fails to address the already existing traffic, flooding and waste problems in Hullbridge, which can only be exacerbated by the proposed policy.</p> <p>(ii) The timetable as set out in policy SER6 is inconsistent with (a)</p>	<p>The Council has prepared the Core Strategy and subsequently the Allocations Document in consultation with numerous infrastructure providers, including Essex County Council (highways, education, and public transport departments), Anglian Water, Environment Agency and the South East Essex Primary Care Trust.</p> <p>The Plan has set out requirements for highways (paragraphs 3.177 to 3.182), flooding (paragraph 3.183) and waste (paragraphs 3.184 to 3.185). However, the details in terms of provision will be determined at the planning application stage.</p> <p>The timescales for development set out in Table 2 where Hullbridge is</p>

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Issues Raised	Initial Officer Comments
<p>timescales across other documents that have been issued by the Council in relation to this process, (b) information given in the past to residents and (c) indications given to Hullbridge's district councillors and others.</p>	<p>divided into two phases with the first phase (SER6a) to be delivered between 2015 and 2021, and the second phase (SER6b) to be delivered post 2021, accords with the adopted Core Strategy (Policy H2 and H3).</p>
<p>The policy should be amended to designate SER6 as a “reserve site” so that development can only take place before 2021 if:</p> <ul style="list-style-type: none"> (i) the Council is satisfied that, with the contributions to be made by developers on that site, the infrastructure needs of both the development and the village as a whole are met, (ii) a real need for such housing on this site is clearly demonstrated. 	<p>SER6a is expected to be delivered between 2015 and 2021 in accordance with the adopted Core Strategy. Whereas SER6b will be safeguarded from development until post 2021, as per Core Strategy Policy H3, unless it is needed to maintain a five-year supply of land for housing.</p>
<p>Residents feel that their views have been irrelevant to the process and this remains the case. Resident's comments, no matter how constructive, have not been taken into account.</p>	<p>Residents' views have been taken into account during the preparation of the Plan.</p>
<p>The Core Strategy initially suggested fewer dwellings for Hullbridge but this was increased due to pressure from other areas of the district.</p>	<p>The housing allocation for Hullbridge is set out in the adopted Core Strategy.</p>
<p>The Hullbridge Action Group (formed in 2010 and participated in the Core Strategy examination) and the Hullbridge Village Community Group (formed in 2011 to produce a parish plan) were not consulted on the pre-submission draft. Not consulting these groups or listening to residents is contrary to the Statement of Community Involvement.</p>	<p>The Council consulted all the statutory consultees, organisations, residents, landowners, developers and agents on our database, including any residents' associations/groups, who expressed a wish to be directly consulted on future planning policy or had previously commented during consultations.</p> <p>A resident representing the Hullbridge Action Group was registered in 2010, and commented on the Discussion and Consultation Document. They were contacted regarding the consultation on the Submission Document.</p>

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Issues Raised	Initial Officer Comments
<p>It has always been understood that special consideration should be taken of community views in Hullbridge. Previously the Council has stated that extensive community involvement would be undertaken in the preparation of the Allocations Document⁴, but the Council has not done so.</p>	<p>The table referred to (table 5 in the Sustainability Appraisal/Strategic Environmental Assessment Core Strategy Adoption Statement) is taken from the Core Strategy Submission Sustainability Appraisal Report which was prepared in September 2009 to accompany the Core Strategy Submission Document.</p> <p>As set out in this document, the Council sought to engage with the local community during the consultation period for the Discussion and Consultation Document in 2010. The Council attended a parish council meeting, which was open to the public, and gave a presentation followed by a question and answer session.</p> <p>Officers also attended an Information Day in Hullbridge during the consultation.</p>
<p>A village survey (2,850 properties, with around a 40% response rate) indicates that residents acknowledge and accept that additional homes will be needed in Hullbridge, if only to satisfy local need.</p> <p>Residents are less concerned about the concept of new housing, but more about the practicality of delivering it. However, there should be community cohesion and appropriate infrastructure prior to development.</p>	<p>Noted. Housing allocation for the District is a strategic issue which is stipulated in the adopted Core Strategy.</p> <p>Infrastructure requirements have been considered throughout the preparation of the Core Strategy and the Allocations Document. Detailed design of the development will be determined at the planning application stage.</p>
<p>It is unclear when development in Hullbridge will take place, which has created frustration amongst residents. We were advised that development would not take place prior to 2021, but the Core Strategy was then adopted in December 2011 with little publicity and the original</p>	<p>The Core Strategy Submission Document (submitted in January 2010) and the adopted Core Strategy (December 2011) both set in Policy H2 that 250 dwellings should be delivered between 2015 and 2021, and an additional 250 dwellings as set out in Policy H3 should be delivered post 2021.</p>

⁴ Reference made to: Sustainability Appraisal/Strategic Environmental Assessment Core Strategy Adoption Statement, table 5. Available from: http://fs-drupal-rochford.s3.amazonaws.com/pdf/planningpolicy_cs_saseaeadoption.pdf

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Issues Raised	Initial Officer Comments
<p>timetable restored.</p>	<p>It is acknowledged that during the Core Strategy examination, when the government initially announced that Regional Spatial Strategies and their associated targets were going to be abolished in May/June 2010, the Council decided to review the housing numbers in the Core Strategy Submission Document and published the Core Strategy Schedule of Changes in October 2010⁵.</p> <p>The Schedule of Changes sought to reduce the annual dwelling target from 250 per year to 190 per year. As such the Council proposed to postpone the delivery of Hullbridge's allocation of 500 dwellings until post 2026. However, subsequent court judgements held that it is inappropriate to give weight to the government's intention to revoke Regional Spatial Strategies in plan-making, so the Council reverted back to the Core Strategy as originally submitted in January 2010.</p>
<p>The Council's own documentation is inconsistent:</p> <ul style="list-style-type: none"> (i) the Allocations Submission Document says that land can be developed from date of adoption of the Allocations Document (ii) the Core Strategy says that there will be no development in Hullbridge before 2015, and (iii) the Hullbridge site referred to as "sites 15, 66, 124, 170, 174" in Appendix 1 of the 2012 SHLAA Review refers to development starting only in 2021 	<p>Paragraph 3.159 notes that SER6a will be reallocated from the adoption of the document to enable development between 2015 and 2021, whereas SER6b will be safeguarded from development until 2021, unless required in order to maintain a five-year supply of deliverable housing land.</p> <p>Noted. This is reflected in the Plan in Table 2 (page 31).</p> <p>The final SHLAA 2012 Review has been amended to reflect the updated housing trajectory. The first dwellings are expected to be built on site in 2019/2020.</p>

⁵ Core Strategy Submission Document Schedule of Changes October 2010. Available from: http://fs-drupal-rochford.s3.amazonaws.com/pdf/cs_schedule_of_changes.pdf

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Issues Raised	Initial Officer Comments
<p>A cabinet member made a minuted comment that no building will commence before 2021, and it has been separately intimated by a district councillor that the site will be the last to be developed.</p>	<p>The adopted Core Strategy sets out that 250 dwellings will be delivered between 2015 and 2021, and 250 dwellings post 2021.</p>
<p>It is likely that the targets for five-year supply of new homes will be met without the need for any development on the Hullbridge site, because:</p> <p>(i) a significant number of major developments have already come forward elsewhere in the district, rather greater than might have been envisaged when the Core Strategy was being prepared, and</p> <p>(ii) the announcement in recent days that HMP Bullwood (in-between Hockley and Rayleigh) potentially provides a major brownfield site that could go some way to meeting district housing supply.</p>	<p>Major developments that have come forward form part of the housing trajectory, and thus the housing land supply, for the District. The Core Strategy and the evidence base which supports it justifies why a small amount of Green Belt is required to be reallocated during the plan period.</p> <p>The proposed development in Hullbridge is needed to ensure a rolling five-year supply of deliverable housing land.</p> <p>The second phase (SER6b), however, will be reviewed alongside other sites identified in the general locations in Core Strategy Policy H3 as part of the Core Strategy review.</p> <p>This site is located in the Green Belt and is currently in use.</p>
<p>The timing of the first phase of development should amended, as there has been a change in circumstances since the Core Strategy was adopted as:</p> <p>(i) the Council now has a clear understanding of the concerns of Hullbridge residents, which it said was a crucial element in developing any proposals for the village;</p>	<p>The timing of the first phase of development (SER6a) is in accordance with the adopted Core Strategy.</p> <p>Issues raised by residents and organisations during the consultation and engagement on the Discussion and Consultation Document have been taken into consideration in the preparation of the Submission Document as set out in the Consultation Statement.</p>

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Issues Raised	Initial Officer Comments
<p>(ii) the Highway Authority policy against use of Watery Lane reinforces the need for the Rawreth Lane developers to secure enhancements to both the road and drainage networks that impact on Hullbridge before any Hullbridge development proceeds under Policy SER6; and</p> <p>(iii) a rapid flow of new developments has already reduced pressure on the need for development in Hullbridge to meet five-year housing need.</p> <p>This uncertainty has resulted in mixed messages about timescales.</p>	<p>The Allocations Document makes clear that the requisite improvements to highways will be required to accompany development, and a site specific flood risk assessment incorporating a surface water drainage strategy should be prepared for the site.</p> <p>See above. The Council is required to demonstrate a rolling five-year supply of deliverable housing land.</p> <p>Timescales for development are set out in the adopted Core Strategy and reflected in the Plan (table 2, page 31).</p>
<p>Paragraph 3.159 could be amended as follows:</p> <p>“The development area set out in this Policy shall not be released in whole or in part before 2021 unless it is require to maintain a five-year supply of deliverable housing land and a review of the plan strategy demonstrates a clear need for it at this location.</p> <p>In any event, no development shall proceed before</p> <p>(i) the Highway Authority shall have determined that the road infrastructure improvements it deems necessary in the area of the proposed developments set out in policies SER1 and BFR4 shall have been completed, and</p> <p>(ii) the appropriate authority shall have determined it necessary under water and waste infrastructure improvements shall have been made by statutory providers to handle increased flows resulting from the additional residential housing envisaged in policies SER1, BFR4 and SER6.</p> <p>(iii) Priority will always be given to development proposals on site SER6(a) unless a strong case can be made to the contrary.”</p>	<p>Suggestion noted. However, the first phase of development is expected to be delivered between 2015 and 2021, with the second phase following post 2021 as set out in the adopted Core Strategy and this Plan (table 2, page 31). A review of the Core Strategy will be undertaken at a later date.</p> <p>The precise detail of any water, waste and road infrastructure improvements will be required to accompany development of SER1 and BFR4 and SER6 and will be determined in detail at the planning application stage.</p> <p>Development in the general location of South West Hullbridge is required to be delivered in accordance with the Core Strategy.</p>

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Issues Raised	Initial Officer Comments
The Inspector proposed an early review of the Core Strategy, now is the right time for a review of the Core Strategy.	The review of the Core Strategy is expected to take place later in the year, although a date has not yet been defined.
Policy SER7	
This site is on elevated/raised land. It would make the development look top heavy. The Plan identifies the 'sensitive' topography of the site.	The topography of the western part of the site has been considered in the development of the Plan. Development of the site is not proposed to extend northwards towards the church. Rather development would be restricted to following the existing boundary of properties in the Green Belt to the west of the proposed site.
The Church is a grade II* Listed Building, and historically it has been the central focus of the village. Building in the proposed location would affect the views of the Church and the rural setting of the village, particularly as it is situated on a steep gradient. The Church creates an imposing visual impression when approaching the village along Scott's Hall Road or Lark Hill Road or from the footpaths from Rochford. The area around the Church should not be built on, and the views from the southern approach to the village should remain unimpeded. The proposed development would also affect the view in the opposite direction i.e. looking south over the Thames estuary.	It is noted that the proposed site is located in proximity to the Church and other Listed Buildings, and a Conservation Area. The potential impact on these, and in particular impact on views of the Church, has been taken into consideration in the development of the Plan (Detailed Assessment of Potential Residential Site Options (September 2012)).
English Heritage has highlighted this Church's tower as the finest in Essex.	Comment noted.
This is a quiet area where people can enjoy a restful time.	Noted.
The existing housing is already dense around the church, and this is only going to add to the situation.	The proposed development is not directly adjacent to the Church. Public open space is proposed to provide a green buffer to the north of the western section of the site to prevent encroachment of development further to the north towards the Church.

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Issues Raised	Initial Officer Comments
<p>This allocation was never the preferred site. This proposed site was chosen by the Council and not by villagers. The majority of residents and the Parish Council are against the proposal. There was a meeting at the village hall to discuss the proposed site for this development in 2010 and this was not the area that was agreed upon. The meeting was attended by parish and local councillors and members of planning from Rochford Council. The area originally agreed to the south of Anchor Lane and east of Scotts Hall Road is preferable and should be developed. This was the site strongly indicated by council officers as the favoured position. The Parochial Church Council also preferred the same location. Developing this site would not cause too much disruption or spoil the landscape. It would not have less of an impact on the Conservation Area and residents, particularly those houses backing onto the proposed development.</p>	<p>The initial consultation in 2010 sought to engage with residents and raise awareness of the document and generate discussions on the options for housing, employment and other land uses presented in the Discussion and Consultation Document.</p> <p>The public meeting attended by officers in Canewdon on 20 April 2010 sought to maximise public awareness of the consultation and explain the purpose and content of the Discussion and Consultation Document. It did not seek opinion on the favoured option, nor was a vote taken. Residents were encouraged to submit their comments during the consultation.</p> <p>Council officers have not previously favoured one site over the other options, prior to the preparation of the Submission Document. The Submission Document sets out the Council's proposed site allocation for this location.</p>
<p>Why after an original site was chosen was it changed without really giving the necessary residents adequate notice that this was happening?</p>	<p>Options for the allocation of land to the south of Canewdon were set out in the 2010 document. The Submission Document sets out the Council's proposed site allocation for this location.</p>
<p>Submissions from developers / the Church authorities should not take precedence over the local people, i.e. the Canewdon Parish Council and the Canewdon Parochial Church Council.</p>	<p>The Council has considered all reasonable alternative site options within this general location, and has a plethora of available evidence, including previous representations on the Discussion and Consultation Document, in proposing the site at SER7.</p>
<p>The Plan goes against the Parish Council which is undemocratic. The Council has put forward reasonable plans to find a site for the houses needed east of Scotts Hall Road and for some reason this is being ignored. The proposed sites should be removed from the Plan and replaced with those proposed by the Parish Council.</p>	<p>It is noted that although the Parish Council is against development on Green Belt land in the village, their preferred option was Option SC1 in the Discussion and Consultation Document.</p> <p>Each of the reasonable alternative options within the general location of 'South Canewdon' have been thoroughly assessed, and the selected site is considered to be the most appropriate and sustainable given the</p>

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Issues Raised	Initial Officer Comments
	alternatives.
This proposed scheme has been promoted above all other sites with no regard for the village, its character and one of the most historic churches in Essex. This site has been questionably promoted going against all the early comments and preferences of the Council's officers.	Options for the allocation of land to the south of Canewdon were set out in the 2010 document. The Council has not promoted one site above the others, or previously identified a preferred site for allocation. The Submission Document sets out the Council's proposed site allocation for this location.
It was clearly stated to me by a senior council officer that development would not be on the site in question and in fact not on the raised area beneath the Church.	The Council has not promoted one site above the others, or previously identified a preferred site for allocation. The Submission Document sets out the Council's proposed site allocation for this location.
The promoter of the site to the east of Scotts Hall Road is offering to give money for the village hall, provide an extra land for a cricket pitch and structure a woodland walk with trees which would make that development more desirable.	Noted.
Other sites should be considered to the north or immediately east of the village adjacent to the existing properties within the village, for example behind/side the village hall making this a more central location for the village, or to the side of the allotments.	Noted, however, these sites would not accord with the general location of South Canewdon stipulated in the adopted Core Strategy.
CPREssex believe that this Green Belt land should not be considered for any development.	Noted.
Alternate sites within the area which are somewhat set away from existing communities should be considered, for example to the east of Scotts Hall Road. A new community can be created without burdening the existing area whilst still encompassing the village life of Canewdon.	Other options to the south of Canewdon were considered during the preparation of the Submission Document, as set out in the Discussion and Consultation Document, the Sustainability Appraisals and the Detailed Assessment of Potential Residential Site Options (September 2012).
A better location would be along Lambourne Hall Road, east of the village hall.	This site would not be located in 'South Canewdon' (as identified in the adopted Core Strategy).

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No development should be allowed to the west of the road running to the Church as the road acts as a defensible Green Belt boundary, and if allowed it could result in further ribbon development along Lark Hill Road. The Green Belt boundary should be retained, and further development should be prevented.	The western and northern boundaries of the site would be defensible as it would be bounded by an existing dwelling to the west and proposed public open space to the north.
The lane going to St Nicholas's Church serves a working farm which has substantial heavy plant machinery travelling up and down which would not be good for the proposed development/residents. The farmer has not been notified.	Noted.
The proposed development site will be accessed via Church Lane which was built as a farm road and access to the church. It will be accessed off a narrow road around a blind bend.	Access to the site will be considered in detail at the planning application stage.
If any development is allowed east of the road to the church then it should be restricted to low density bungalows to reduce visual impact and maintain the nature of the village.	The detailed design of any development, including dwelling mix, will be determined at the planning application stage.
The Parish Council did not know of this site being promoted by the Church until 18 August 2012 and are totally against the proposal.	Noted. However, a variation of this site (encompassing Options SC2 and SC3 from the Discussion and Consultation Document) was consulted on in March and April 2010.
We have farmed the field since 1958 when we first moved to Canewdon and do not want to lose valuable farmland.	Noted. The majority of the field in question (to the west of the lane leading up to the Church) would be retained in agricultural use.
There are better alternatives to this site e.g. site 223b that do not impinge on views of church which is the prime characteristic of the village. This site would be better suited with more land available to spread out housing. Trend in housing currently is to cram as many houses as possible into as small a space as possible. This concentration would spoil	The suggested site (Call for Sites reference 223b) is located to the south of the junction of Anchor Lane and Gardeners Lane.

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the character of the village.	
Any development should be on the east side of Church Road only - where houses already exist and thereby maintaining development within already existing village boundaries. The number of dwellings should be reduced accordingly.	Comment noted. However, the quantum of dwellings proposed for the general location of South Canewdon is a strategic issue, and is set out in the adopted Core Strategy. All of the reasonable alternative options to the South of Canewdon have been assessed in detail within the Detailed Assessment of Potential Residential Site Options (September 2012).
Brownfield, low-lying land should be considered.	The SHLAA 2012 Review has considered and assessed all appropriate brownfield sites.
Backland should be considered for development.	The appropriateness of 'backland' development would be considered on a case-by-case basis, having regard to the policies in the emerging Development Management Document. Such development, if permitted, would likely be considered as windfall development and cannot be included in housing delivery projections. However, such development is monitored through the Annual Monitoring Report.
It is not clear whose needs this development meets; who these dwellings are aimed at (for example, children leaving homes; older generation downsizing). The Council should consider residents above the profits of developers and land-owners.	The majority of the proposed development would be market housing, and around 35% would be affordable housing consisting of 80% social housing and 20% intermediate housing.
There should be a significant reduction in the number of dwellings proposed – there should be 30 properties at most.	The general location of South Canewdon was identified in the Core Strategy for the allocation of 60 dwellings from 2015 to 2021 (Policy H2).
There should be no development in Canewdon.	This is a strategic issue addressed within the adopted Core Strategy.
How can a 21st century house with solar panels etc. be sympathetic in design to a medieval church?	The detailed design of any will be determined at the planning application stage.

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Whitehouse Farm in Lark Hill Road and the Vicarage are grade II listed. If the Council wants to be sympathetic to the listed buildings then why build near them when there are better allocations in Canewdon?	The Plan notes that there are several listed buildings in proximity to the site. Design of the development, taking into account the potential impact on these buildings, would be determined at the planning application stage.
Development will blight the Listed Buildings. It would also impact on the Canewdon Church Conservation Area.	Potential impact on the Listed Buildings and the Conservation Area has been considered in the identification of the proposed area for allocation.
There is no main drainage west of the church road and there is poor surface water drainage. This site has bad drainage which will only add to the problem, because it will be on a gradient and has no infrastructure.	Infrastructure, including SUDS to manage surface water would be required to accompany any development of this site.
The village lacks the infrastructure to support the proposed development. Significant investment would be required.	Infrastructure requirements to support the delivery of this site have been considered during the development of the Plan. Further detailed requirements will be provided at the planning application stage.
Although the Plan suggests that infrastructure issues will be addressed, this will not be proven until after the development and then it would be too late.	Infrastructure requirements to support the delivery of this site have been considered during the development of the Plan. Further detailed requirements will be provided at the planning application stage.
The sewer system will not cope. The prowtings site at the top of the high street already has issues with overflowing of sewers. Existing drainage cannot cope.	Paragraph 3.214 notes that downstream sewers are likely to need upgrading prior to development. Anglian Water did not raise any issues with SER7.
The proposed development would put additional pressure on the village's electricity supply.	This would be considered at the planning application stage.
The sewage system and water pressure are not good at the moment, with the number of properties in the village. The proposed development would impact these further.	Noted, however, Anglian Water did not raise any issues with SER7.
There is no pavement from Lark Hill Road to the area of the first	The Plan notes that improvements to the local pedestrian/cycling network

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detached houses along Anchor Lane, and walking children along Lark Hill Road would be dangerous, encouraging parents to drive to the School, where there is little available parking.	would be required. In particular it notes that there is no footpath to the south side of the site between Lark Hill Road and Anchor Lane (paragraph 3.211).
Canewdon is not a commuter village. Other towns nearby like Rochford, Hockley, Ashingdon and even Southend have more than enough space and the necessary services/infrastructure to provide for more housing (particularly affordable housing as people will not need to buy and upkeep a private car). Brownfield land in Southend, for example redundant industrial/office space, should be developed instead, before greenfield land elsewhere.	<p>The District has a limited amount of brownfield as demonstrated in the SHLAA 2012 Review. Justification for the allocation of Green Belt land for housing is set out in the Core Strategy, and as such the Council has identified the minimum amount of Green Belt required to meeting dwelling requirements for the District.</p> <p>Other local authorities such as Southend Borough Council have their own housing needs to meet.</p>
Canewdon is a small isolated place that would suffer with an increase in its population.	Justification for the allocation of Green Belt land for housing, including distribution between settlements, is set out in the Core Strategy.
There are three routes out of the village (Lark Hill Road, Stambridge and Brays Lane) which all lead onto Ashingdon Road. This main road is already busy. The proposed development in Canewdon, in addition to other proposed developments (for example Rochford, Hockley and Ashingdon) will exacerbate congestion, as many of the approved and planned development converge at Ashingdon Road.	<p>The Council has considered highway infrastructure throughout the preparation of the Core Strategy and the Allocations Document. The Core Strategy (Appendix H1 in particular) identifies where improvements to the highway network would be required to accompany residential development in Policies H2 and H3. This was scrutinised during the Core Strategy examination.</p> <p>Essex County Council as the highways authority have been closely consulted throughout the process of the Core Strategy and the Allocations DPD and as such have considered the cumulative, and individual, impact of the developments across the District on the highway network. The consideration of potential sites has included views from the Highways Authority. This was done on an individual location basis and on a cumulative basis which assessed the impact of the cumulative development.</p>
The roads are not properly maintained, and would need to be improved.	Local highway capacity and infrastructure improvements will be required to

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They are inadequate to accommodate existing traffic. Development along Lark Hill Road would cause a road safety risk.	accompany development of this site. The precise details will be determined at the planning application stage.
It will add more congestion to an already small and unfit access road that leads to the Church.	Local highway capacity and infrastructure improvements will be required to accompany development of this site. The precise details will be determined at the planning application stage.
The proposed development would make the village noisier and busier due to an increased number of vehicles generated. This would impact the environment and the surrounding area.	A Transport Assessment, including an assessment of air quality, will be required to accompany any planning application to develop the site. This must examine the additional transport impacts that the development of this site will generate. Actions to address impacts identified through the Transport Assessment will be required to accompany the development of the site, or be provided prior to the commencement of development. In addition, development has been directed to an area of Canewdon from where – given the relative location of attractors such as neighbouring towns – traffic is less likely to be directed through the village.
There is a limited bus service in the village. This would have to be improved. Otherwise private car usage will increase.	There are existing bus routes to Canewdon, however, public transport infrastructure improvements and service enhancements would be required to accompany development of this site (paragraph 3.194).
Transport costs mean that living in a village is not always affordable.	There are existing bus routes to Canewdon, however, public transport infrastructure improvements and service enhancements would be required to accompany development of this site (paragraph 3.194).
Parking is an existing issue, which impacts on pedestrian and road safety, for example near the school.	Noted.
Recycling and waste disposal would have to be increased. Servicing by refuse vehicles has not been considered.	This will be considered in detail at the planning application stage. Advice and guidance will be provided in the emerging Development Management Document.

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The local primary school is more than at capacity. It may not be able to cope with an influx of children, and would require expansion.	The Council has worked closely with Essex County Council Schools Children and Families service throughout the production of the Core Strategy DPD and this document to ensure that schools have the capacity to support increased population, and if not where was the most appropriate site to locate any new educational facilities. Provision for increased capacity at existing secondary schools has also been accounted for.
It is uncertain whether nearby secondary schools would be willing to provide bus services for extra pupils.	
There are limited facilities in Canewdon to cope with the proposed development; two shops, one junior school and a small village hall.	Noted.
There is an insufficient police presence in the village.	This is not a planning issue.
There are no real activities for children to engage in. Play spaces for children are required.	Play space is required to accompany proposed development.
Facilities for older people such as green bowls or petanque should be considered.	Open space is required to be provided to the north of the proposed site, to the west of the lane (paragraph 3.200). Precise details in terms of provision will be determined at the planning application stage.
With more houses in the village, the number of children will rise. There is little to do, except the park, which could lead to increased anti-social behaviour, and due to the lack of policing, increased crime.	The Sustainable Community Strategy for Rochford District was produced by the Local Strategic Partnership (a partnership of key public, private and voluntary sector organisations) and gives all organisations a clear focus on what the priorities are in the District. These priorities include supporting the District's fostering greater community cohesion. The Sustainable Community Strategy notes there is a perception of anti-social behaviour and a fear of crime and disorder, a perception that the Local Strategic Partnership and its partners will help to address through greater community engagement and supporting community projects.
We have a clear lack of policing, and I feel that more houses will only worsen the situation. Will we get more police coverage with this proposed	This is not a planning issue.

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development?	
As there is a limited bus service, children will rely upon parents to take them to places such as Southend/Clements Hall/Garons etc., which will increase the amount of traffic.	There are existing bus routes to Canewdon, however, public transport infrastructure improvements and service enhancements would be required to accompany development of this site (paragraph 3.158).
Land on the eastern boundary has been subject to subsidence in the past, and no survey has identified this. There would be a possible impact on the structural integrity of existing homes and garages bordering the site.	This would need to be explored and addressed at the planning application stage.
The proposed site is in the Green Belt and in agricultural use. The greenfield land should not be developed, especially if it can be/is used for farming.	The reallocation of Green Belt land is a strategic issue which has been addressed within the adopted Core Strategy.
The development would hugely affect the value of neighbouring properties. Many people choose to live here because of unspoilt views and are not prepared for their properties to be devalued when there is land available to develop which would have less of an impact on existing dwellings.	<p>This is not a planning issue.</p> <p>There is no legal right to an uninterrupted view of the countryside and the allocation of land within the Development Plan does not affect this. The development of new residential dwellings will require planning permission and, in considering applications, the Council will have regard to the impact of any proposals on the amenity of the occupiers of neighbouring homes, i.e. issues such as overlooking will be addressed through the planning application process.</p> <p>The potential visual impact of development on this proposed site has been considered during the preparation of the Allocations Document.</p> <p>Further evidence of consideration given to the effect on the rural nature of the area and visual impact of development is provided within Detailed Assessment of Potential Residential Site Options (September 2012).</p>

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From the map it would seem that two properties will be purchased to complete the development, one of these was refused permission to build another bungalow in its grounds due to overdevelopment.	Noted. The whole site is within the Green Belt.
Privacy, security and outlook for existing homes would be negatively affected.	This will be considered at the planning application stage.
Villages will not stay villages development continues; Canewdon should remain a village.	The allocation of dwellings to Canewdon (in particular to the south of Canewdon) accords with the adopted Core Strategy.
As we are in a recession, people are not moving into the area for employment.	The Council has considered the delivery of employment land and jobs in conjunction with housing over the plan period.
Dog walkers and ramblers enjoy the peace and beauty of this area and we attract people from outside the area to see its beauty, and use the many quiet public footpaths that surround this beautiful area.	Noted.
If development needs to take place in the village, then more consultation is needed, as the Council has not involved the residents enough. Residents were not aware of the proposals, and should have been contacted individually. Residents seem to have no say in this site. The consultation material was not easy to find. There does not appear to have been any transparent cohesive consultation since 2010 on the proposals until now.	Residents who responded to the initial consultation in 2010 were informed of the consultation on the Allocations Submission Document. The Parish Council were also sent a poster highlighting the consultation. Paper copies of both the Allocations Submission Document and the representation forms, including guidance notes, were available during the consultation.
Decisions should be made at the most local level about issues affecting a local community.	The Plan was voted on at Full Council by local councillors on 27 November 2012.
I have been told that this is the allocated site, and only minor changes can be made now, although only a few people knew about the Plan.	Residents who responded to the initial consultation in 2010 were informed of the consultation on the Allocations Submission Document. The Parish Council were also sent a poster highlighting the consultation.

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The consultation should have been transparent across multiple forms of media, not just on a 'difficult to navigate' website.	The Council did not rely on the website for the consultation. This consultation statement sets out how people were consulted. Paper copies of both the Allocations Submission Document and the representation forms, including guidance notes, were available during the consultation.
It is difficult to understand how the document fits in with the array of multi-level supporting documents.	The relationship between the Allocations Document, and other plans and strategies is set out in the introduction of the Plan.
We should have been contacted individually. We had objected 2 years ago so our contact details would be on your file.	The respondent was added to the Council's database in 2010, and a letter was sent out during the consultation period on the Plan.
We moved to the country and do not want a housing estate at the end of our garden.	The Plan suggests that trees and hedges should be developed in garden areas along the northern, western and southern boundaries of the site to create a green buffer in perpetuity between new and existing development, whilst promoting integration (paragraph 3.203).
There is going to be a minimum of 21 affordable housing units. The village already has a high number of social houses and this will only compound the problem.	The Council has a duty to facilitate the delivery of affordable housing in the District. Policy H4 of the Core Strategy requires that 35% of dwellings on site are required to be affordable (unless demonstrated to be unviable/undeliverable).
The proposed development would overdevelop this area, and make the entrance to the village look like an urban environment rather than a village in the countryside. It would not be in-keeping with the village's aesthetic and would impact on the character of the area. The sense of community and the village feel/identity/appeal will be lost if more houses are built.	The design and character of the proposed development would be addressed in detail at the planning application stage. Proposals would be considered against the emerging Development Management policies.
Canewdon is predominantly greenfield land. The proposed development goes against government policy as I believe they are attempting to reduce urban sprawl.	The Plan accords with the adopted Core Strategy to meet housing need.

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<p>The proposed development would have an adverse effect on the residential amenity of neighbours due to the increased level of noise, disturbance, overlooking, and loss of privacy and over shadowing caused by the location of the new dwellings. Also a loss of existing views. We paid a premium for our house, but affordable housing will have better views.</p>	<p>There is no legal right to an uninterrupted view of the countryside and the allocation of land within the Plan does not affect this. The development of new residential dwellings will require planning permission and, in considering applications, the Council will have regard to the impact of any proposals on the amenity of the occupiers of neighbouring homes, i.e. issues such as overlooking will be addressed through the planning application process.</p> <p>The potential visual impact of development on this proposed site has been considered during the preparation of the Allocations Document.</p> <p>Further evidence of consideration given to the effect on the rural nature of the area and visual impact of development is provided within Detailed Assessment of Potential Residential Site Options (September 2012).</p>
<p>The proposed development would adversely affect the local wildlife.</p>	<p>The area to the South Canewdon is not identified as being of ecological importance. However, any impact identified on wildlife habitats will be required to be addressed.</p>
<p>Empty/derelict properties should be identified and regenerated to address the housing shortage.</p>	<p>The Thames Gateway South Essex Housing Group re-launched its Empty Homes Initiative on 28 November 2012. The group is working with private owners to renovate empty properties in the sub region and make them available to people in housing need over the next two years.</p>
<p>The proposal does not specify any total numbers.</p>	<p>The Plan sets out, in accordance with the Core Strategy, that 60 dwellings are allocated for the proposed site in SER7 but would permit a 5% increase in the number provided (although this is caveated; see paragraph 3.196).</p>

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<p>Developing this site will set a precedent for future housing. The next phase will be housing from Anchor Lane up to the church boundary.</p>	<p>The area to the north of the eastern part of the site is located in the Canewdon Church Conservation Area. The site in question was submitted to the Council for consideration during the SHLAA 2012 Review consultation in August 2012, but was not considered in detail during the preparation of the Plan due to its late submission.</p> <p>However, it should be noted that the Council is committed to an early review of the Core Strategy, which would likely comprise those site identified in Core Strategy Policy H3 (this includes the second phase of development to the South West of Hullbridge – SER6b).</p>
<p>If a car park is put up near the church, then we will have concrete not farm land. It could also increase anti-social behaviour.</p>	<p>A car park is not proposed near the Church. The Plan proposes that the area to the north of the identified site should be allocated for open space (and remain in the Green Belt).</p>
<p>This area is well-used by ramblers and dog walkers. However, developing here will encourage more traffic and anti-social behaviour. The churchyard will be used as a 'cut through' from the proposed development to the main village (i.e. the school/shop etc.). Vandalism is likely to occur at the church. The Church is a place of rest, and the churchyard will not be respected for what it is.</p>	<p>Comment noted.</p>
<p>The proposed development would have an impact on the open and rural character of the churchyard and vicarage grounds contrary to the Canewdon Church Conservation Area Appraisal and Management Plan (paragraph 6.11 and 7.3).</p>	<p>Paragraph 6.11 of the Canewdon Church Conservation Area and Management Plan states that:</p> <p>“The main focus of the conservation area is provided by the churchyard and vicarage grounds, which are characterised by their open and rural setting. However the western end of the High Street is also included which is of a more enclosed and intimate in character, and has been treated as a sub-area of the main conservation area.”</p>

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	<p>Paragraph 7.3 states that:</p> <p>“Boundary treatments are important to the character of the conservation area and should be appropriate to the rural context. Appropriate materials include soft red brick, timber post and rail fencing and native hedgerow planting. The boundary between the vicarage and churchyard should be kept low to maintain the important visual relationship between the two. The structural instability of the existing wall means that further loss of this important feature is likely without intervention, and repair, consolidation and ongoing condition monitoring should be undertaken. Views through the vicarage grounds should be preserved to protect the open and rural character of the churchyard.”</p> <p>The eastern part of the proposed development, although bordering the southern boundary of the Conservation Area, is already developed. The proposed site would not directly impact on the open rural character of the churchyard and vicarage grounds.</p> <p>Potential impact of development at the views has been assessed within Detailed Assessment of Potential Residential Site Options (September 2012) and taken into consideration in the preparation of the Plan.</p>
<p>The views in and out of the Conservation Area (Figure 18) would be significantly affected by the proposed development.</p>	<p>The impact on views from the Church (Figure 18 of the Conservation Area has been assessed within Detailed Assessment of Potential Residential Site Options (September 2012) and taken into consideration in the preparation of the Plan.</p>
<p>Any development in this location would affect a historic route and affect the visual appeal and character of the village (paragraph 6.10).</p> <p>The proposed site is situated in the most sensitive location in the village, to the south of the Church. The sensitivity of the site is acknowledged in</p>	<p>Paragraph 6.10 states that:</p> <p>“The lane running off Lark Hill Road is a historic route leading to Canewdon Hall. It climbs the hill to the church tower in a gentle curve that draws the eye upwards, providing visual drama as the massive tower reveals itself above</p>

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<p>the Plan (paragraph 3.201). However, it seeks to mitigate this through design alone, which is insufficient.</p>	<p>the surrounding trees and hedgerow (Fig. 17). The lane is edged with hedgerow contributing to the rural character, and the modern housing developments of Canewdon village are visible across paddocks to the east. Field gates provide access to the vicarage grounds from the lane. At the top of the hill the lane opens up to provide a parking area by the west gate to the churchyard, and a field gate leads through to Canewdon Hall Farm. Gaps in the hedge at the top of the lane allow expansive views north towards the Crouch estuary and west across arable fields towards Ashingdon.”</p> <p>The Concept Statement for the proposed site is not prescriptive in stating that the site must be accessed from the road leading up to the Church. This will be determined in consultation with the appropriate bodies such as the local highway authority at the planning application stage.</p> <p>The proposed site does not extend northwards as far as the Church. Indeed, it is proposed that an area of public open space is development to the west of the lane to prevent encroachment further north and to strengthen the Green Belt boundary in this location.</p> <p>The design and landscaping of the proposed development will be required to take into consideration the presence of the Listed Buildings and the Conservation Area (paragraph 3.207).</p>
<p>The restricted size of the site, the location and the elevated nature of the land itself do not provide the necessary options, or space for any significant degree of mitigation.</p>	<p>The size, location and nature of the site has been considered in detail. Appropriate mitigation measures have been set out in the Plan, however, the detailed design of any development will be considered further at the planning application stage.</p>
<p>Impact of works traffic on the road network.</p>	<p>Issues associated with works traffic will be addressed through conditions attached to a planning application.</p>
<p>The proposed site is located to the west of Canewdon, as opposed to the</p>	<p>This site accords with the general location of South Canewdon stipulated in</p>

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south of Canewdon as set out in the Core Strategy.	the adopted Core Strategy.
The church is illuminated at night. Additional light pollution from the proposed development would obscure this view.	Light pollution will be considered in detail at the planning application stage. It will be managed through the development management process.
Although Canewdon should take its share of development, the proposed site would be contrary to the Core Strategy which seeks to protect our heritage. The NPPF (paragraph 132) also places significant weight on the protection of heritage assets.	<p>Paragraph 132 of the NPPF states that:</p> <p>“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.”</p> <p>However, the proposed development would not result in a loss of an historic asset, and although located in proximity to several Grade II/II* Listed Buildings, it is not considered to be located within their setting and would not constitute “substantial harm”.</p>
The local community object to the proposed development to protect the heritage of the area. Development should not take place in this location.	Comment noted.
If the houses are screened with trees etc., due to the elevated position of the site, it is likely to screen part of the church as well. It would affect views of the Church as well as the view from the Church at the top of the hill. Development would also impinge on the views from the top of the	Details of tree planting would be determined at the planning application stage; the provision of trees on the proposed site would not screen the Church, particularly given that the proposed development site would continue to be separated from the Church by an area of greenfield.

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tower for visitors.	
Rather than the short views assessed by the Council, the medium-longer distance views will be significantly affected. Development will restrict views of the church.	Comment noted.
The Council have not undertaken an appropriately thorough assessment of the impact of this proposed development, relying instead on an assumption that "design" can overcome the impact on the setting of the Grade II* listed church.	Development is not proposed to extend northwards as far the church itself. It is proposed to be inline with existing development to the west along Lark Hill Road, and as such would not extend significant up the elevation. Each of the sites in the general location of South Canewdon have been assessed in detail with the Detailed Assessment of Potential Residential Site Options (September 2012) document which form part of the evidence base for the Plan. Design can mitigate the potential impact on the views of the church, for example through stipulating appropriate heights, and will be considered in detail at the planning application stage.
The proposed housing will be taller than the bungalow to the southwest and positioned higher up the hill.	Detailed design of the proposed development will be considered at the planning application stage in consultation with relevant officers.
Paragraph 3.203 suggests that existing and proposed trees should be placed in private ownership as part of the proposals, but this will not protect their future.	Paragraph 3.203 proposes that trees and hedgerows be developed in garden areas, however preservation orders could be attached to ensure that they remain in perpetuity. This will be considered further at the planning application stage in consultation with relevant officers.
Paragraph 3.204 accepts that it is likely that some trees will be lost which will irreversibly damage the existing green, undeveloped setting of the church.	This will be considered in detail at the planning application stage. However, the Plan requires that any loss of trees should be compensated with replacement trees on a like-for-like basis (paragraph 3.204). In addition, a green buffer would be required along the western, southern and northern boundaries (paragraph 3.203).
Paragraph 3.207 acknowledges that the proposal sits within a very sensitive location, seeking the protection of named listed buildings.	Paragraph 3.207 notes that: "The detailed design and layout of development must ensure there is no

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	adverse impact on the setting of these listed buildings.”
It is unclear whether the Plan includes two bungalows to the south east or not, and whether this land is available for development in the short, medium or long term.	The area encompassing the two existing bungalows has been put forward as part of the ‘Call for Sites’ (reference: 4). This site has been included within Policy SER7 alongside the parcel of land to the west to deliver the dwelling and infrastructure requirements for this general location (‘South Canewdon’). The parcel of land to the west has also been put forward to the Council for consideration (reference: 193). The Plan proposes that density of the development will be lower towards the western section of the site (paragraph 3.202). However, the distribution of dwellings and the detailed design of the development will be determined at the planning application stage in consultation with officers.
If the land encompassing the bungalows cannot be delivered, then this limits the flexibility of the site, contrary to the supporting text.	Deliverability of this part of the site has been considered in the SHLAA Review 2012 and the Allocations Submission Document.
With the loss of two bungalows, the site should accommodate a minimum of 62 new homes to compensate for this loss.	Noted.
SUDS are proposed, and the best place for a balancing pond would be to the south of the site where the land is lower. However, open space is proposed to the north which will not provide landscape mitigation or SUDS. There are also existing drainage issues.	<p>Surface water measures would need to be adequate to accommodate potential surface water flooding. This would be determined at the planning application stage in conjunction with Essex County Council and the Environment Agency.</p> <p>Open space proposed to the north of the site (paragraph 3.200) is proposed to remain in the Green Belt and act as a green buffer to prevent development in close proximity to the Church.</p>
Access to Canewdon Hall Farm would still be required and the road would need upgrading. Families would have to cross the road to access open space/play space.	Noted.

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Issues Raised	Initial Officer Comments
The area surrounding the church is of archaeological significance and developing in this location will place considerable pressure on the below ground artefacts.	Below ground archaeological deposits would have to be considered at the planning application stage in consultation with Essex County Council and English Heritage.
It is incorrect to identify the land immediately associated with the bungalows as "multi-surface" on Figure 7 - this is misleading. Other than the actual bungalows, these sites are green in nature.	This statement is unclear. Figure 7 relates to potential highway routes for the proposed site to the north of London Road, Rayleigh.
Representations made on the Discussion and Consultation Document in relation to Option SC1 and SC3, for example SC1 would create a defensible Green Belt boundary, but SC3 would not (the chosen option).	This is incorrect. A variation of Option SC3 which would create a defensible Green Belt boundary has been included in the Submission Document.
Without any explanation in the supporting documentation, there has been a shift in the views of the Council that is not evidence based. In the Submission Document, the disregarded option SC1 incorrectly comments that the lack of an existing southern boundary is a negative element to the site. Whereas previously this was seen as a positive feature of the site.	<p>The Submission Document itself does not make reference to Option SC1 (which was considered in the Discussion and Consultation Document and appraised both within the Updated Sustainability Appraisal July 2012, and as part of a slightly larger option within the Detailed Assessment of Potential Residential Site Options September 2012 – ‘Call for Sites’ reference 165).</p> <p>The site identified as Option SC1 within the Discussion and Consultation Document was assessed against the reasonable alternatives both within the detailed assessments (Detailed Assessment of Potential Residential Site Options September 2012) and the Sustainability Appraisal.</p> <p>The Updated Sustainability Appraisal (July 2012) concluded that whilst Options SC1, SC2 and SC3 performed strongly against the sustainability objectives, if Option SC3 was taken forward then it should exclude the small area to the west and, if possible, be extended northwards.</p> <p>The detailed assessment of the sites in this location considered this potential option, and surmised that:</p> <p>“...if this site [‘Call for Sites’ reference: 4] and the site to the west of Ash</p>

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	<p>Green (ref: WAG1) were allocated the site area would be less than the approximate minimum site threshold of 2.67 hectares (and give a site size of 1.8 hectares). Based on the calculations within the SHLAA (2012) at an indicative density of 30 dwellings per hectare, these sites could accommodate between 41 and 49 dwellings. This figure is below the dwelling requirement for 'South Canewdon' as set out in the Rochford District Core Strategy." (page 545).</p> <p>The site to the west of Ash Green is also located within the Conservation Area. The inclusion of the site to the west of Ash Green was also considered in detail within the Sustainability Appraisal (April 2013) – reference ALT12 and was rejected.</p> <p>The site referred to as Option SC1 has been assessed further within the detailed assessments ('Call for Sites' reference: 165). Other sites within the general location of South Canewdon have also been assessed in detail.</p> <p>The Allocations Submission Document Sustainability Appraisal (April 2013) concluded that:</p> <p>"SC1 is not located in the Coastal Protection Belt, however, the appraisal noted that whilst it could accommodate the housing requirements for this general location, it would extend the designated residential area further to the south. SC1 was primarily rejected for this reason." (page 56).</p> <p>The SA also concluded that:</p> <p>"The proposed site for Policy SER7 performs well against the sustainability criteria. It is well related to the existing settlement of Canewdon following the natural boundaries along the approach to St Nicholas Church and not projecting northward of the existing development to the west of the site to the north of Lark Hill Road." (page 58).</p>
The site assessment (Sept 2012), concludes for the land to the south of	It is noted that the Core Strategy identifies the general location of South

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Anchor Lane, that whilst the site will not result in the coalescence, it would extend the existing allocated residential area of Canewdon further to the south. This is written as a negative point, despite the fact that the Core Strategy is seeking the development of 60 houses "South of Canewdon".	Canewdon for the development of 60 dwellings over the plan period. However, the site identified within SER7 has been assessed in detail against the reasonable alternatives, both within the detailed assessments (Detailed Assessment of Potential Residential Site Options September 2012) and the Sustainability Appraisal, and it is considered that the proposed site would be the most appropriate.
The density figures demonstrate that the proposed site does not have the capacity to provide the number of houses at an appropriate density and also provide the open space.	It is expected that the western section of the site, as per the Plan, would have a lower density to respect the setting of the Church. Open space is required to be provided to the north of the site to ensure that this area remains open.
Option SC1 can provide the dwellings required and additional facilities above that required in the policy (for example open space, woodland and a sports field). It can also create a new southern boundary. Financial contributions would also be made to the village hall in addition to the standard S106 requirements.	Noted.
Land to the south of Anchor Lane will connect directly into the existing public footpath system, across Anchor Lane and also to the east connecting to the footpath that runs north-south via a new footpath across the landowners land.	Comment noted.
More people in Canewdon will help sustain existing services, which are under threat.	Noted.
The local shops and amenities will not be able to cope.	Comment noted.
Rochford is supposed to be a 'green' district, but is proposing to build on Green Belt land.	The Core Strategy sets out why and where Green Belt should be released to meet housing need.
All new development should be west of Rochford town, where major	Identifying the general locations for new development is a strategic issue

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roads, shops, schools and employment are available, rather than to the east of the town centre.	which is addressed within the adopted Core Strategy. The following general locations are identified for new development up to 2021: North of London Road, Rayleigh; West Rochford; West Hockley; South Hawkwell; East Ashingdon; South West Hullbridge; and South Canewdon. Three general locations are identified for new development post-2021: South West Hullbridge; South East Ashingdon; and West Great Wakering.
The proposed development is located on the flood plain which is liable to flooding.	The area identified is not located on a flood plain. However, any surface water issues will be addressed at the planning application stage.
There is already enough housing in the area. There should not be more housing.	This is a strategic issue which is addressed within the Core Strategy.
There will be increased traffic on the country lanes.	Local highway capacity and infrastructure improvements, and public transport infrastructure improvements and service enhancements would be required to accompany development of the site.
The Plan has been very robustly produced, with this site justified after numerous consultations and assessments.	Noted.
This land, particularly to the east of Church Lane was the only site considered, where the boundary is fully defensible, it is brownfield, in that it already contains two residences and is located adjacent to the existing residential estate.	This part of the site, as noted in the evidence base; both the SHLAA 2012 Review and the Detailed Assessment of Potential Residential Site Options (September 2012), is predominantly greenfield land with some brownfield land.
The Local Authority has included the area to the west of Church Lane, to ensure a density of properties in keeping with the local area, and to accommodate additional play and green areas.	Comment noted. Density of the site will be determined at the planning application stage.
The site is located outside the Church Conservation Area, some distance from the listed buildings, and on significantly lower ground, ensuring with	Comment noted.

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sensitive design minimal effect on views of or from the church.	
<p>The proposal for 60 dwellings up to 2021 allows scope for upgrading of local transportation, cycling routes, play spaces together with financial support for schools and general infrastructure improvements; all of which have been assured within the Plan and something which could not be achieved with a smaller or piecemeal development.</p> <p>This also allows for a mixture of integrated social housing, including key worker homes etc.</p> <p>The Plan ensures that this will be a sustainable development, requiring compliance with the Code for Sustainable Homes, 10% renewable energies, a sustainable drainage system, and lifetime homes.</p> <p>With good design this will enhance the area rather than cause harm.</p>	<p>Noted.</p> <p>The type and tenure of housing provided on this proposed site will be determined at the planning application stage.</p> <p>These will be required for the proposed development in accordance with the Core Strategy.</p> <p>Design of the proposed development will be considered in detail at the planning application stage.</p>
This allocation is considered to be proportionate to the scale of the existing settlement and assist in supporting existing services and facilities.	Noted.
Support the proposed development.	Support noted.
There should be a village and council meeting to discuss plans further.	The options set out in the Discussion and Consultation Document were discussed at a parish council meeting in 2010. The options have been considered in further detail, and taking into consideration the responses received to the 2010 consultation and other evidence, the Submission Document has been prepared.

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Issues Raised	Initial Officer Comments
Policy SER8	
Support the proposed development.	Support noted.
Support the approach detailed in paragraph 3.221; however, notwithstanding the site been safeguarded to 2021, in accordance with the 'plan, monitor, manage' approach, the site could be delivered early in order to meet the Districts 5-year housing supply.	There is flexibility in both the Core Strategy and the Allocations Document to enable sites later on in the plan period to be brought forward, if necessary.
The eastern boundary would consist of a natural / semi-natural greenspace in order to create a defensible boundary to the Green Belt. Play facilities would also be located throughout the site.	Noted.
Policy SER9	
The Green Belt around the village should be preserved. Green Belt land should be protected from development. If the Council can build on Green Belt then what is the point in designating it?	The reallocation of Green Belt land is a strategic issue which has been addressed within the adopted Core Strategy.
The proposed site is grade 1 agricultural land. Land which is less valuable for producing food should be considered.	The reasonable alternative options considered for the general location of 'West Great Waking' are also located on grade 1 agricultural land as identified in the Strategic Environmental Assessment Baseline Information profile which forms part of the evidence base for the development plan.
Derelict properties and buildings should be renovated / brownfield sites need to be used for housing first. Agricultural land should not be developed.	Brownfield land has been considered in the SHLAA 2012 Review.
The number of dwellings proposed in addition to the existing plans for Star Lane industrial estate would overburden the existing facilities in the village.	The Council has prepared the Core Strategy and subsequently the Allocations Document in consultation with numerous infrastructure providers, including Essex County Council (highways, education, and public transport

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	departments), Anglian Water, Environment Agency and the South East Essex Primary Care Trust. The infrastructure required to accompany development of the sites identified in Policy SER9 are set out in paragraph 3.253 of the Allocations Submission Document.
The local schools and doctor's surgery within the village would not be able to cope with an increase in population. Parking at the doctor's surgery is inadequate. Expansion of these facilities would impact on the village's identity/character.	The Council has prepared the Core Strategy and subsequently the Allocations Document in consultation with numerous infrastructure providers, including Essex County Council (highways, education, and public transport departments), Anglian Water, Environment Agency and the South East Essex Primary Care Trust.
There is no local secondary school in the village. The 'local' secondary school is in Rochford.	It is noted that the village does not have a secondary school. However, the Council has worked closely with Essex County Council Schools Children and Families service throughout the production of the Core Strategy DPD and this document to ensure that schools have the capacity to support increased population, and if not where was the most appropriate site to locate any new educational facilities. Provision for increased capacity at existing secondary schools has also been accounted for.
A larger primary school should be built.	
The roads around the village are quite narrow, particularly the High Street. Parking and access and egress to/from the side roads are already an issue. The volume of traffic will increase and air quality will decrease.	Local highway capacity and infrastructure improvements are required to accompany development of the sites (paragraph 3.253).
The roads in south east Essex are inadequate. Access could be improved through the provision of a new dual carriageway from the A130 eastwards towards Great Wakering.	Local highway capacity and infrastructure improvements are required to accompany development of the sites (paragraph 3.253). Essex County Council did not raise any specific concerns in relation to the highway network in this location.
Traffic congestion is an issue in the area, which will increase will further development. As there are no jobs locally they people will commute to their place of work which brings no value to the community. Congestion will increase.	

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Parking and traffic issues can impact on pedestrian safety as the roads and footpaths are narrow. Parking along the High Street is an issue.	
Barrow Hall Road is very narrow and in some places two cars can only just pass each other.	Local highway capacity and infrastructure improvements are required to accompany development of the sites (paragraph 3.253). This will be considered in detail at the planning application stage. Essex County Council did not raise any specific concerns in relation to the highway network in this location.
Southend Road is a dangerous road with many accidents and additional housing will only add to it. Accidents occur at the Star Lane/Southend Road roundabout.	
The need for highway access to the south of land to the west of Little Wakering Road will create traffic problems on Southend Road, Star Lane and the High Street.	
Little Wakering Road is totally unsuitable to take anymore traffic.	
Public transport is inadequate and the service is threatened, which could add to road congestion. Cars are needed to travel anywhere, and more houses will mean more pollution.	The Plan requires that public transport infrastructure improvements and service enhancements accompany development of the sites (paragraph 3.253).
The existing water and sewage services are already stretched and would not be able to cope with more people.	The Plan notes the capacity constraints in relation to Southend Waste Water Treatment Works. The Environment Agency suggested that paragraph 3.282 be amended to acknowledge uncertainty regarding the capacity (Comments 118 and 119 of specific and general consultation body comments). However, Anglian Water did not raise any concerns in respect of this site.
Development should be restricted to the existing plan for no more than 250 dwellings within the Star Lane area.	The site identified to the south of the High Street does not have the capacity to accommodate 250 dwellings at an appropriate density, given its proximity to the Local Wildlife Site.

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<p>Great Wakering is at risk of flooding due to poorly maintained sea defences, but additional housing is proposed. There are no plans to improve the circumstances of existing residents. New residents are put before existing residents.</p>	<p>The proposed sites are not located in an area at risk of flooding. The Environment Agency did not raise any concerns in respect of these sites.</p> <p>Flood defences are the responsibility of the Environment Agency. The Shoreline Management Plan forms part of the evidence base for the Council's development plans.</p>
<p>Even with a field behind our property (SER9a) the garden is often water logged, building new properties will add to this problem.</p>	<p>Surface water measures would need to be adequate to accommodate potential surface water flooding. This would be determined at the planning application stage in conjunction with Essex County Council and the Environment Agency.</p> <p>SUDS are required to be approved and implemented alongside the proposed development as set out in the Plan (paragraph 3.281).</p>
<p>Local residents are being refused house insurance as Wakering is a 'flood risk'. More buildings will add to this problem, not solve it.</p>	<p>The area proposed for development is not located within an area at risk of flooding, as identified by the Environment Agency. Surface water flooding will be addressed at the planning application stage.</p> <p>Insurance is not a planning issue.</p>
<p>Crime and anti-social behaviour would increase. Great Wakering is relatively crime free and the area is not routinely policed.</p>	<p>The Sustainable Community Strategy for Rochford District was produced by the Local Strategic Partnership (a partnership of key public, private and voluntary sector organisations) and gives all organisations a clear focus on what the priorities are in the District. These priorities include supporting the District's fostering greater community cohesion. The Sustainable Community Strategy notes there is a perception of anti-social behaviour and a fear of crime and disorder, a perception that the Local Strategic Partnership and its partners will help to address through greater community engagement and supporting community projects.</p>

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The Catholic Church on Little Wakering Road is used 5 days a week by Poppets playgroup and would not be useable as a building site access point as suggested.	Noted. However, the Plan does not suggest this. Paragraph 3.274 suggests that an access/egress point for the site to the west of Little Wakering Road may be provided to the north onto Barrow Hall Road and/or to the south onto Southend Road.
The western end of the village does not have any infrastructure.	Improvements to infrastructure required to accompany development of proposed sites are set out in Appendix H1 of the Core Strategy and within the policy (paragraph 3.253).
The infrastructure and services have not been improved even after the recent new housing developments have been completed.	Noted. However, improvements to infrastructure required to accompany development of proposed sites are set out in Appendix H1 of the Core Strategy and within the policy (paragraph 3.253).
There are no plans to significantly improve the local infrastructure. The Plan should set out how the imbalance of local amenities/infrastructure will be addressed.	Improvements to infrastructure required to accompany development of proposed sites are set out in Appendix H1 of the Core Strategy and within the policy (paragraph 3.253).
At any given time, there are a number of existing dwellings on the property market in the village. The development of flats/housing on the High Street (opposite Little Wakering Road) were left empty for some time and may not be at full capacity now.	Whilst this may be the case, the dwellings allocated for Great Wakering in Core Strategy Policy H2 are not expected to be delivered until post-2021. In addition, it should be noted that the Council is committed to an early review of the Core Strategy, which would likely comprise those sites identified in Core Strategy Policy H3 (this includes West Great Wakering – SER9).
The proposals would not necessarily guarantee 'affordable' housing in the village.	As set out in the Core Strategy (Policy H4), at least 35% of dwellings on all developments of 15 or more units, or on sites greater than 0.5 hectares, will be required to be affordable, unless it can be demonstrated that this would be economically unviable, rendering the site undeliverable.
There are already enough 'new build' estates. Increasing the size of the village would have a negative impact on the village's identity/character and the community feeling. The village character; quiet and uncongested	The Council has sought to reallocate the minimum amount of Green belt land necessary to meet housing and employment need, and has identified two sites for residential use and one site for employment use (to compensate

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with plenty of fields and open spaces should be protected.	<p>for the loss of Star Lane Industrial Estate through the plan period).</p> <p>Design of any development will be determined in detail at the planning application stage.</p> <p>Policy OSL1 of the Plan seeks to protect existing open spaces within the District.</p>
The land to the west of Little Wakering Road is agricultural land. It supports wildlife and provides a boundary for Great Wakering.	<p>It is noted that the site identified to the west of Little Wakering Road is located on agricultural land.</p> <p>The area to the West of Great Wakering is not identified as being of ecological importance. However, any impact identified on wildlife habitats will be required to be addressed.</p> <p>The area to the west of the site identified as SER9a is proposed to remain in the Green Belt and accommodate public parkland (paragraph 3.262).</p>
The proposed development to the south of the High Street would encourage coalescence Shoebury and other areas. The village would lose its identity and become a suburb of Southend.	The design and character of the proposed development would be addressed in detail at the planning application stage. Proposals would be considered against the emerging Development Management policies.
Local amenities are inadequate. There are insufficient shops to the west and south of the village to provide for further housing.	Comment noted.
The area to the south of the High Street supports wildlife.	Although there is a Local Wildlife Site adjacent to the area proposed for development to the south of the High Street, the area is not identified as being of ecological importance. However, any impact identified on wildlife habitats will be required to be addressed. In addition, a Management Plan for the Local Wildlife Site would be required.

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The proposed development would disrupt wildlife and birds.	Any impact identified on wildlife habitats will be required to be addressed, and a Management Plan for the Local Wildlife Site would be required.
Land in and around Shoebury, empty houses and airport land should be used instead.	<p>Shoebury is located within Southend on Sea Borough. In any case, delivering housing in Shoebury cannot meet housing needs in Great Wakering.</p> <p>The Thames Gateway South Essex Housing Group re-launched its Empty Homes Initiative on 28 November 2012. The group is working with private owners to renovate empty properties in the sub region and make them available to people in housing need over the next two years.</p> <p>Land around the airport (identified in Policy NEL4) is being considered separately through the emerging London Southend Airport and Environs Joint Area Action Plan.</p>
Inadequate infrastructure (schools, shops, water supply, waste water, gas, electricity, doctor's surgeries and roads) to cope increased demand. Narrow roads, pavements and parking are an issue, for example along the High Street.	The Council has prepared the Core Strategy and subsequently the Allocations Document in consultation with numerous infrastructure providers, including Essex County Council (highways, education, and public transport departments), Anglian Water, Environment Agency and the South East Essex Primary Care Trust. Infrastructure requirements to accompany the development of both sites are set out in the policy.
Although the document proposes to encourage walking and cycling, this is unlikely to happen and would exacerbate traffic problems.	The sites are located in proximity to the centre of the village. Walking and cycling within the village will be encouraged, for example through the provision of Travel Plans at the planning application stage. In addition, public transport infrastructure improvements and service enhancements are required to accompany development of these sites.
The Sports Centre closed about 18 months ago and may not open again. Although a new facility is being developed at the local school, this will not be big enough for new residents as well. A community centre is unlikely	Noted. However, public open space, play space, and youth and community facilities are required to accompany development of the sites. The detail will

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to be sustained. The park is still there, but more community facilities are needed.	be determined at the planning application stage.
Speeding is an issue along the High Street.	Noted.
A new community should be created with its own identity where it would not affect anyone.	This is a strategic issue which was considered during the preparation of the Core Strategy.
The proposed development would impact on views of the countryside.	<p>There is no legal right to an uninterrupted view of the countryside and the allocation of land within the Plan does not affect this.</p> <p>The potential visual impact of development on this proposed site has been considered during the preparation of the Allocations Document.</p> <p>Further evidence of consideration given to the effect on the rural nature of the area and visual impact of development is provided within Detailed Assessment of Potential Residential Site Options (September 2012).</p>
There is nothing in the village for young people to do.	Youth facilities would be required to accompany development of the sites (paragraph 3.253).
The nature reserve at the old brick fields on Alexandra Road should be preserved.	The Star Lane Pits Local Wildlife Site is proposed to be retained and allocated within the Plan (Policy ELA1).
The two sites identified are owned by different companies.	Noted.
The Plan should identify how many dwellings should be provided on each site to provide clarity on what is required, otherwise this leaves the policy open to dispute between the land owners/developers and the District Council as to what was intended. For example: "The SER9a has a capacity for xxx dwellings and SER9b a capacity of xxx. SER9a should have at least xx affordable homes and SER9b xx affordable homes." The	The precise density and dwelling distribution will be determined at the planning application stage. However, it should be noted that the Council is committed to an early review of the Core Strategy, which would likely comprise those site identified in Core Strategy Policy H3 (this includes both sites to the West of Great Waking).

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numbers should be calculated by the Council.	
The road/track to the south of the industrial estate (in Green Belt) runs eastwards from Star Lane. It provides access/egress to the Local Wildlife Site and is only used infrequently by fishermen and has a padlocked gate for security.	Noted. The Concept Statement at paragraph 3.276 recognises that development proposals in this location (specifically SER9b, BFR1 and NEL3) would need to be comprehensively planned, and as such one access/egress point serving the sites should be carefully considered. This would be considered in detail at the planning application stage.
Access should not go through wildlife site as stated in Policy SER9b.	The Concept Statement for this policy states that access/egress for the sites identified in Policy BFR1, SER9b and NEL3 should not go through the Local Wildlife Site (paragraph 3.276).
<p>The following needs to be considered:</p> <ul style="list-style-type: none"> • access from the road/track to BFR1 and SER9b must be within 50 metres after the junction with Star Lane to minimise disruption of the local wildlife site • visibility splays may possibly be created on land in BFR1 • impact on road structure in BFR1 of traffic to/from SER9b • impact on dwellings of industrial traffic (NEL3) using one access/egress 	Access/egress arrangements would be considered in detail at the planning application stage.
Land to the west of Little Wakering Road (SER9a) is relatively remote from services and facilities, does not provide a defensible western Green Belt boundary and would be harmfully intrusive into open countryside compared to land to the west of Alexandra Road.	<p>The accessibility of the site has been assessed in detail within the Detailed Assessment of Potential Residential Site Options (September 2012).</p> <p>This site would enable the provision of a defensible western Green Belt boundary through the requirement to provide public parkland to the west of the site identified as SER9a (paragraph 3.262). This area of parkland is proposed to remain in the Green Belt.</p> <p>Land to the west of Alexandra Road was also assessed in detail within the Detailed Assessment of Potential Residential Site Options (September</p>

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	<p>2012). This assessment considered that:</p> <p>“Given the current condition and its proximity to the Local Wildlife Site there is potential that this site could have biodiversity value, however, it is noted that this site was not included within the boundary of the adjacent Local Wildlife Site when these were reviewed in 2007. Part of this site could be used as open space and/or a wildlife corridor.” (page 691).</p> <p>In addition, the ecological potential of this site was highlighted in the assessment summary within the Sustainability Appraisal (April 2013):</p> <p>“It was also noted that the site to the west of Alexandra Road (part of Option WGW3) could have ecological value.” (page 58).</p>
<p>The proposed allocation of two separate sites would create a segregated form of development and would therefore have a negative impact on community cohesion.</p>	<p>Whilst the segregation of the sites is noted. The Sustainability Appraisal (April 2013) concluded that:</p> <p>“Policy SER9 is well related to the existing settlement with access to significant amounts of public open space, Greenway 20 and a Local Wildlife Site. It is also in close proximity to a primary school and shops and services within Great Wakering itself.” (page 59).</p>
<p>Land to the west of Alexandra Road should be allocated as an extended part of SER9b instead of SER9a. It would be closer to the village centre than SER9a or SER9b and would create a defensible Green Belt boundary. It would not be segregated, would promote community cohesion and support local businesses. It would perform well in sustainability/integration terms compared to the other options in this general location, particularly SER9a.</p>	<p>Land to the west of Alexandra Road was also assessed in detail within the Detailed Assessment of Potential Residential Site Options (September 2012). This assessment considered that:</p> <p>“Given the current condition and its proximity to the Local Wildlife Site there is potential that this site could have biodiversity value, however, it is noted that this site was not included within the boundary of the adjacent Local Wildlife Site when these were reviewed in 2007. Part of this site could be used as open space and/or a wildlife corridor.” (page 691).</p> <p>In addition, the ecological potential of this site was highlighted in the assessment summary within the Sustainability Appraisal (April 2013):</p>

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	<p>“It was also noted that the site to the west of Alexandra Road (part of Option WGW3) could have ecological value.” (page 58).</p> <p>This site was therefore not taken forward in the process.</p>
<p>Land to the west of Alexandra Road was considered in the Discussion and Consultation Document as part of Option WGW3 alongside two other sites. The disadvantages of releasing land to the south of Star Lane brickworks had a distorting impact on the overall case (or score) for this option. The Sustainability Appraisal in respect of WGW3 is therefore misleading and flawed.</p>	<p>As above, land to the west of Alexandra Road has also been assessed in its own right as part of the detailed assessment work undertaken prior to the finalisation of the Allocations Submission Document (Detailed Assessment of Potential Residential Site Options September 2012). The site was considered to have potential ecological value, which is reflected in the Sustainability Appraisals, and was therefore not considered further.</p>
<p>The Sustainability Report issued at 'Discussion & Consultation' correctly states that 'the site to the west of Alexandra Road would relate well with Option WGW1 and provide an alternative access route from the site'.</p>	<p>Comment noted.</p>
<p>Support the allocation SER9, in particular sub-allocation SER9b.</p>	<p>Support noted.</p>
<p>The respondent owns the land identified as SER9b, as well as a significant land interests to the south and east of the allocation. This affords flexibility and opportunity to not only deliver the new housing area, but also the required employment land, secure the wildlife area and potentially provide new areas of public open space.</p>	<p>Comment noted.</p>
<p>The land is available, deliverable and fully developable with no impediments.</p>	<p>Comment noted.</p>
<p>The Council is advised that this land will be maintained in agricultural use until it is required for housing. However, the respondent will adopt a flexible approach to land management so that the land can be made available sooner, if supply does not keep pace with the Council's housing trajectory.</p>	<p>Noted.</p>

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SER9, BRF1 and NEL3 need to be considered jointly.	Noted. The Plan considers potential scenarios in terms of the delivery of the three sites. Delivery of the sites will be monitored through the Annual Monitoring Report.
SER9b could deliver 185 dwellings at 22 dwellings per hectare, and SER9a could deliver 100 dwellings giving a total of 285 dwellings across the sites. This is not unreasonable given the additional 5% and a Core Strategy review prior to 2021.	The precise density and dwelling distribution will be determined at the planning application stage, although 285 dwellings would far exceed 250 dwellings plus 5% proposed in the Plan. However, it should be noted that the Council is committed to an early review of the Core Strategy, which would likely comprise those site identified in Core Strategy Policy H3 (this includes both sites to the West of Great Wakering).
The respondent would be willing to develop a better management plan for the local wildlife site, which enhances its quality and ensures that it is able to co-exist alongside housing development and thrive in the long term.	A management plan is required to be prepared for the Local Wildlife Site with the development of SER9b.
If Star Lane Industrial Estate identified in BFR 1 cannot be delivered (the site is in multiple ownership and mix of freehold and leasehold tenure), then it is unlikely that NEL3 would be constructed without the industrial units being pre-let. In this event, land directly to the south of the brickworks can compensate for dwellings not delivered on the industrial estate. If the industrial estate can be developed, then NEL3 can be delivered. Public open space to the south of the local wildlife site can also be provided.	The Council acknowledge that the site will not come forward in the early part of the plan period (the majority of the Industrial Estate is not included in the five-year land supply). Alternative employment land will be allocated (as proposed within NEL3) and the Council will work with landowners, developers, business representatives and other stakeholders to ensure this is delivered and that displaced businesses are suitably relocated.
The respondent has met with the Parish Council to explain the likely approach to the allocations and present basic masterplans. Informal dialogue will continue.	Comment noted.
New employment land should be delivered before the houses.	It is expected that the proposed site identified in NEL3 would come forward before the residential development on the northern part of the industrial

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	estate to compensate for this loss.
Will these properties be built for local people? What sort of people will be moving in?	Around 65% of the houses delivered in this location will be market housing, and so will be sold on the open market. The remaining 35% (depending on viability) will be affordable housing. This will be determined through the planning application process.
Existing properties will decrease in value.	This is not a planning issue.
Development will create noise pollution and negatively impact on local residents.	The development of new residential dwellings will require planning permission and, in considering applications, the Council will have regard to the impact of any proposals on the amenity of the occupiers of neighbouring homes.
<p>There is concern that the proposed 250 dwellings, when combined with the dwellings proposed at the Star Lane Industrial Estate, would result in a significant increase to the existing settlement.</p> <p>The number of dwellings proposed should be reduced to the area covered by SER9a, with the residual units redistributed to allocations attached to higher order settlements.</p> <p>The housing market, especially for first time buyers, is declining. The proposal to build 140 or more dwellings on the former brickworks site is about the most that village requires.</p>	The general location of 'West Great Wakering' was identified in the Core Strategy for the allocation of 250 dwellings from post-2021 (Policy H3).
Support the proposed allocation of land to the west of Little Wakering Road, identified as SER9a.	Noted.
The Foulness and Great Wakering Ward has been identified as being a primary recipient of in-migration to the Borough.	Comment noted.

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The wider land parcel to the west of SER9a is available and is considered to be a suitable alternative location for housing and employment land should the need be identified and alternative locations (i.e. to SER9b and/or NEL3) be determined to be either unacceptable to the local community or less sustainable.	Noted.
<p>Extending SER9a could improve access to the site from the south in accordance with the supporting text of the policy.</p> <p>The site is deliverable and developable prior to 2021 should it be needed.</p>	<p>The minimum amount of land necessary to meet housing and employment needs has been identified in the Plan. Allocating additional land adjacent to the site identified as SER9a would be inappropriate. This land is proposed to be allocated for parkland as set out in the Plan. Access/egress will be considered in detail at the planning application stage.</p> <p>Comment noted.</p>
There is concern that the Council may not be able to identify a five year supply of deliverable housing sites that accords with the NPPF and recent appeal decisions.	<p>Both the Annual Monitoring Report and the SHLAA 2012 Review demonstrate that the Council has a five year supply of land for housing.</p> <p>In addition, the Core Strategy also stated that the Council will maintain a flexible approach with regards to the timing of the release of land for residential development to ensure a constant five-year supply of land. Therefore, the Council should be able to respond to any changes in land supply promptly with such an approach.</p>
There is concern that the housing provision targets contained within the Core Strategy, and by extension within the housing land supply numbers, do not meet the requirement of the NPPF to meet the 'full objectively assessed needs for market and affordable housing' (paragraph 47).	The Core Strategy housing figures were based on the, objectively assessed, targets set out in the East of England Plan (2008) which was revoked on 3 January 2013. Affordable housing requirements were objectively assessed within the 2008 Strategic Housing Market Assessment, but the 2010 Affordable Housing Viability Study found that a maximum of 35% affordable housing would be appropriate, unless demonstrated to be unviable.
Such concerns with housing land supply are magnified where delivery from identified sites is constrained and levels of in-migration are	Comment noted.

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comparatively high. The Allocations Document includes a number of examples of where housing land supply is likely to be constrained, but particular attention is drawn to the identified constraints at SER9b.	
There is concern that the other proposed allocations in West Great Wakering - SER9b and NEL3 - are likely to be constrained by wildlife and other ecological matters related to the Star Lane Local Wildlife Site, would contribute to the potential coalescence of between Great Wakering and Shoeburyness and would encourage development in a locally sensitive landscape.	The proposed allocations (SER9b and NEL3) have been considered and assessed in detail within both the Sustainability Appraisal and the Detailed Assessment of Potential Residential Site Options (September 2012). Issues, including potential impact on the Local Wildlife Site and coalescence have been carefully considered.
The Plan should be amended accordingly.	Noted.
There is a large natural gas main running north-south through SER9a. I understand that no new development can be built within 400m. The regulations regarding underground gas mains should be looked in to.	Comment noted. However, this site including the land to the west up to the track/road has been submitted to the Council for consideration through the 'Call for Sites' (reference: 177), and has been included within the 2012 SHLAA Review. Submissions from agents/developers/landowners in relation to the site in response to consultation on the SHLAA has not identified the presence of a gas main through the site. This will be considered at the planning application stage.
Policy GT1	
In February 2010, the land opposite 2 Goldsmith Drive in Rayleigh was suggested as one of the options (Option GT7) for providing a permanent site for Travelling Showpeople within the Allocations DPD Discussion and Consultation Document.	This is incorrect. Although the site was put forward for consideration as a site for Travelling Showpeople, it was presented in the 2010 Discussion and Consultation Document as a potential option for a Gypsy and Traveller site allocation (Option GT7).
In April 2010, representations were made in support of promoting the land as a permanent site for Travelling Showpeople within the emerging Allocations DPD.	Noted (representation number: 23015).

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<p>In July 2012, the Council published an updated 'Discussion and Consultation Document Sustainability Appraisal'. This document recommends that the land meets overall sustainability criteria and it is suitable and appropriate to allocate as a permanent Gypsy and Traveller Site.</p>	<p>Although the site was originally submitted to the Council through the 'Call for Sites' for consideration as a site for Travelling Showpeople, it was included within the Discussion and Consultation Document as an option for the allocation of a Gypsy and Traveller site (Option GT7). This is acknowledged within the Updated Sustainability Appraisal (July 2012); paragraph 4.20. this assessment does not specifically state that the site meets the overall sustainability criteria, indeed, it notes that it would not have a positive impact on balanced communities objective (paragraph 6.83) and would not promote a defensible Green belt boundary (paragraph 6.91).</p> <p>Furthermore as noted with the Sustainability Appraisal for the Submission Document (April 2013):</p> <p>"GT7 would not accommodate the full pitch requirement and an additional site would need to be allocated elsewhere in the Green Belt. This option also may not enable the creation of a defensible Green Belt boundary. GT7 was therefore rejected." (page 60).</p>
<p>This site has not been included in the Allocations Submission Document, and no other site is made available for Travelling Showpeople to meet our client's needs.</p>	<p>The Essex Gypsy and Traveller Accommodation Assessment 2009 which forms part of the evidence base for the Plan found that between 2008 and 2021 requirement to provide plots for Travelling Showpeople within the District.</p>
<p>Since 2010, the applicants have been looking at all possible alternative sites including industrial estates to meet their needs elsewhere on other sites, but no sites were found. In summary, no site is available to meet the client's needs within the Rochford District.</p>	<p>It is noted that two planning applications have been submitted for this site, in 2011 (Ref: 11/00741/COU) and most recently in March 2013 (Ref: 13/00118/COU).</p> <p>However, the Essex Gypsy and Traveller Accommodation Assessment 2009 which forms part of the evidence base for the Plan found that between 2008 and 2021 requirement to provide plots for Travelling Showpeople within the District.</p>

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Planning Policy for Traveller Sites (March 2012) states that local planning authorities should make their own assessment of need for the purposes of planning and increase the number of traveller sites in appropriate locations with planning permission.	Noted. The 2009 assessment forms part of the evidence base for the Plan. It should be noted, however, that a new assessment will be prepared to inform the review of the Core Strategy.
A need for a permanent site for Travelling Showpeople has been demonstrated since 2010 through the 2010 consultation. A report was submitted providing a detailed justification and outlining the need for sites within Rochford and the applicant's needs for this particular site.	The Council has identified land for a Gypsy and Traveller site having regard to the Core Strategy (Policy H7), which itself is based on the objectively assessed needs for the District set out in the 2009 Essex Gypsy and Traveller Accommodation Assessment and the (revoked) East of England Plan.
The Council has failed to recognise the applicant's needs for a permanent site for Travelling Showpeople within the Allocations Submission Document. The Local Planning Authority has a duty to assess the needs of Travelling Showpeople just as for the Settled Community. The Local Planning Authority is failing in their duty in not making any assessment of need not to mention meeting it.	The Council has identified land for a Gypsy and Traveller site having regard to the Core Strategy (Policy H7), which itself is based on the objectively assessed needs for the District set out in the 2009 Essex Gypsy and Traveller Accommodation Assessment and the (revoked) East of England Plan.
An assessment of need for accommodation for travelling showpeople needs to be made as an evidence base for a policy for the provision of five year supply of sites for travelling showpeople.	The 2009 Essex Gypsy and Traveller Accommodation Assessment and the (revoked) East of England Plan did not identify a need for Travelling Showpeople within the District. A site for Gypsies and Travellers has been identified in accordance with Core Strategy Policy H7.
New Employment Land Allocations	
Purdey's Industrial Estate is currently the largest employment site in the district as confirmed by the 2008 Employment Land Study which identifies it as 'fit for purpose... should be maintained and, if possible, expanded'.	Comment noted.
Land to the west of Purdey's Industrial Estate is ideally located to support development and establishment of a strategic employment location which	This site is not within one of the general locations for new employment

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<p>is establishing at Southend Airport. Allocating this land would expand and enhance Purdey's due to its location, and it has the ability to accommodate uses which whilst vital to the success of growth of operations at the airport would not be able to afford to be located airside.</p>	<p>land in the Core Strategy (west of Rayleigh, south of Great Wakering and north of London Southend Airport). However, it has been assessed within the Core Strategy as an alternative option, and as summarised within the Sustainability Appraisal (April 2013):</p> <p>"It was acknowledged that although ALT9 would ensure access to jobs in this area, it has the potential to detract from future employment opportunities to the west of Rayleigh, south of Great Wakering and to the north of London Southend Airport. It would be an addition to the strategic locations identified in the Core Strategy.</p> <p>Furthermore the Updated SA (July 2012) also noted that whilst the allocation of this site would be able to create a defensible Green Belt boundary, it would result in the loss of Green Belt land in the District where no justification for such loss is evidenced and would impact on the local landscape and openness of the area.</p> <p>Consequently this option was rejected." (page 61).</p>
<p>The proposed allocations on land to the west of Rayleigh and north of the Annwood Lodge Business Park are considered to be unsuitable for distribution uses and not deliverable respectively.</p>	<p>NEL1 is proposed to accommodate light industrial and offices uses as set out in paragraph 5.10.</p> <p>NEL2 has been submitted through the 'Call for Sites' (reference: 49; 108) for consideration for employment use.</p>
<p>Land to the west of Purdey's is well contained by existing development and could facilitate improvements to the transport network, including the Anne Boleyn junction.</p>	<p>This site has been assessed within the Sustainability Appraisal.</p>
<p>Its identification within the Allocations DPD would not be precluded by the policies of the Core Strategy. This site should be allocated.</p>	<p>The allocation of this site would be inappropriate and would not accord with the adopted Core Strategy.</p>

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Policy NEL1	
NEL1 is already substantially used for employment purposes and the Plan seeks the retention of these existing uses (paragraph 5.14). The land that is not so used is not suitable for development in the manner suggested.	Comment noted.
The undeveloped land to the west of existing businesses has no existing means of access, and which would be of limited use, given the shape of the land.	Comment noted. Access will be considered further at the planning application stage.
The land to the east of the existing uses has a frontage to London Road, but the majority of this land is affected by the twin pylon lines that cross the site in a north/south direction. Although the pylons would not preclude commercial development as such, the lines themselves hang relatively low of the site, such that two storey development across the majority of the site would be difficult to achieve.	Design of any development coming forward on this part of the site will be determined in detail at the planning application stage.
<p>There have been no representations on the part of the landowner supporting the development of the site for commercial purposes, and no interest from any developer seeking to undertake a commercial development.</p> <p>NEL1 is not a suitable location for the proposed high quality office use required by Core Strategy Policy ED4. It is not deliverable.</p>	<p>The allocation of land for additional office use in this location was recommended through the Employment Land Study. Core Strategy Policy ED4 identifies that land to the south of London Road should be allocated for new employment land. It is part of the Council's long-term strategic plan to facilitate the provision of additional office use in this location and accommodate uses displaced from Rawreth Industrial Estate (light industrial and office uses are proposed for this site).</p> <p>The Council acknowledge that Rawreth Industrial Estate will not come forward in the early part of the plan period (it is not included in the five-year land supply). However the Council will work with landowners, developers, business representatives and other stakeholders to ensure that Rawreth Industrial Estate is delivered for housing and that displaced businesses are suitably relocated.</p>

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<p>Some commercial development can be developed as part of a mixed-use allocation north of London Road (SER1), where the costs of the servicing a commercial development (drainage, utilities, highways) can be shared with the development of the residential element.</p>	<p>New employment land to the south of London Road has been identified in accordance with the Core Strategy. This is considered to be well related to proposed new residential development to the north of London Road. Additionally the Concept Statement proposes the development of small-scale neighbourhood shops within the residential allocation.</p>
<p>The location would be difficult to access by public transport (would be further away from the train station than the existing industrial estate that they seek to replace), which means that it would be in not as sustainable location.</p>	<p>Disagree. Rawreth Industrial Estate has been assessed within the 2012 SHLAA Review and has a 'medium' access to public transport – between 800m and 2.4km walking distance – including both bus stops and the train station (page 453).</p> <p>Similarly, the site identified in Policy NEL1 was assessed within the Detailed Assessment of Potential Employment Sites (March 2012) within Options E13 to E16, which were found to have medium access to the train station – between 800m and 2.4km walking distance. They were assessed as having 'high' access to bus routes – within 800m walking distance.</p>
<p>The location of new offices in the proposed location would not accord with the locational requirements detailed within the NPPF.</p>	<p>It is unclear which part of the NPPF this comment specifically refers to.</p>
<p>Rawreth Industrial Park is a sustainable location, and a more sustainable approach would be to redevelop the industrial park with a commercial scheme with a design of unit that is flexible enough to accommodate a range of employment uses.</p>	<p>The Council acknowledge that Rawreth Industrial Estate will not come forward in the early part of the plan period (it is not included in the five-year land supply). However the Council will work with landowners, developers, business representatives and other stakeholders to ensure that Rawreth Industrial Estate is delivered for housing and that displaced businesses are suitably relocated.</p>
<p>The idea of de-allocating land in a sustainable location in order that it can be allocated for housing and then identifying new employment sites in less sustainable locations than the existing site is a contradiction.</p>	<p>The proposed new employment site is not considered to be in a less sustainable location than Rawreth Industrial Estate.</p>

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<p>The provision of future employment and housing should be to take a co-ordinated approach to the release of Green Belt land, and the requirements for employment and housing land considered together to limit the potential loss of Green Belt to the most sustainable locations, accessible by a range of means (including public transport), and with defensible boundaries.</p>	<p>The provision of housing and employment land has been considered together both within development of the Core Strategy and Allocations Document.</p>
Policy NEL2	
<p>It seems highly unlikely that the Rawreth Lane Industrial Estate will be redeveloped.</p>	<p>The Council acknowledge that the site will not come forward in the early part of the plan period (it is not included in the five-year land supply). Alternative employment land will be allocated (as proposed within NEL1 and NEL2) and the Council will work with landowners, developers, business representatives and other stakeholders to ensure this is delivered and that displaced businesses are suitably relocated.</p>
<p>It is unclear whether or not this site is reserved solely for the relocation of uses from Rawreth Lane (aside from the proposed recycling centre). This should be clarified in the Plan.</p>	<p>Paragraph 5.32 of the Plan states that the site would accommodate heavier industry and waste transfer businesses as well as a recycling centre.</p>
<p>If that is not the case, and the land is simply notionally available for relocation of existing uses, then there is of course no guarantee that even if an existing use from Rawreth Lane was able to afford the costs of relocation, that there would be space available for them on NEL2 to enable this to happen. If the land is not specifically reserved and left for relocating businesses, then the chances of Rawreth Lane ever being redeveloped are diminished even further, since existing business will stay.</p>	<p>Paragraph 5.31 sets out the general requirements for the allocation of a site for employment land in accordance with Core Strategy Policy ED4; however, as noted within the Updated Sustainability Appraisal (July 2012) it would be more appropriate to allocate two separate sites, given the potentially conflicting uses (heavy industrial, light industrial and office uses). Therefore paragraph 5.32 clarifies that the site identified in Policy NEL2 is proposed to accommodate heavier industry and waste transfer businesses as well as a recycling centre.</p>
<p>The site is not appropriate for high quality office use (as identified in paragraph 5.31) given its relative remoteness.</p>	<p>The site is not proposed to accommodate office uses.</p>

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<p>Given that the site is also identified at paragraph 5.32 for 'heavy industry', it seems highly unlikely that it would attract a high quality office use anyway.</p>	<p>Offices uses are not proposed for the site identified in NEL2.</p>
<p>Reference to high quality offices should be deleted from NEL2. It also requires clarification as to whether or not the land is actually reserved for the relocation of existing business from Rawreth Lane, and not for general industrial use.</p>	<p>As above, paragraph 5.31 sets out the context for the allocation of employment land to the west of Rayleigh, however, as there are two sites proposed to be allocated (NEL1 for office uses and light industrial), paragraph 5.32 clarifies that this site (NEL2) would be appropriate for accommodating heavier industry and waste transfer businesses as well as a recycling centre.</p>
<p>The location would be difficult to access by public transport (would be further away from the train station than the existing industrial estate that they seek to replace), which means that it would be in not as sustainable location.</p>	<p>It is noted that the proposed employment land to the west of the A1245 would be located further away from the train station than Rawreth Industrial Estate.</p> <p>However the Allocations Submission Document Sustainability Appraisal (April 2013) surmised that, for a proposed employment allocation potential accommodating heavy industrial and waste management uses and a recycling centre:</p> <p>“Policy NEL2 generally performs well against the sustainability objectives, as it has good links to the highway network (A127 and A1245) and can accommodate a significant proportion of employment land without impacting on residential amenity or the local highway network.” (page 63).</p>
<p>The locations of new offices in the proposed location would not accord with the locational requirements detailed within the NPPF.</p>	<p>This site is not proposed to accommodate office uses as set out in paragraph 5.32.</p>
<p>This is an isolated location within the Green Belt, which would make it difficult to establish a defensible boundary and also contribute to the coalescence of the neighbouring settlements.</p>	<p>The Allocations Submission Document Sustainability Appraisal (April 2013) acknowledges that:</p> <p>“The site is detached from existing residential areas and the policy proposes that it be allocated to accommodate heavy industrial uses relocated from</p>

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	<p>Rawreth Industrial Estate (Policy BFR4) and a recycling centre. Relocating such uses away from the existing residential areas would have a positive impact in terms of air quality and amenity.</p> <p>It is located on an area of degraded countryside. The site also has the potential to create a defensible Green Belt boundary and may preserve the character and openness of Green Belt in other locations.” (page 63).</p>
<p>As Rawreth Industrial Park is a sustainable location, a better approach would be to redevelop the industrial park with a commercial scheme with a design of unit that is flexible enough to accommodate a range of employment uses.</p>	<p>The Council acknowledge that Rawreth Industrial Estate will not come forward in the early part of the plan period (it is not included in the five-year land supply). However the Council will work with landowners, developers, business representatives and other stakeholders to ensure that Rawreth Industrial Estate is delivered for housing and that displaced businesses are suitably relocated.</p>
<p>The idea of de-allocating land in a sustainable location in order that it can be allocated for housing and then identifying new employment sites in less sustainable locations than the existing site is a contradiction.</p>	<p>Employment and residential uses are different land uses. Sites in use as employment land may be more appropriately used for residential (and indeed, vice versa).</p>
<p>The provision of future employment and housing should be to take a co-ordinated approach to the release of Green Belt land, and the requirements for employment and housing land considered together to limit the potential loss of Green Belt to the most sustainable locations, accessible by a range of means (including public transport), and with defensible boundaries.</p>	<p>The provision of housing and employment land has been considered together both within development of the Core Strategy and Allocations Document.</p>
<p>Policy NEL3</p>	
<p>The road/track to the south of the industrial estate (in Green Belt) runs eastwards from Star Lane. It provides access/egress to the Local Wildlife Site and is only used infrequently by fishermen and has a padlocked gate for security.</p>	<p>Noted. The Concept Statement at paragraph 3.276 recognises that development proposals in this location (specifically SER9b, BFR1 and NEL3) would need to be comprehensively planned, and as such one access/egress point serving the sites should be carefully considered. This would be</p>

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	considered in detailed at the planning application stage.
Access should not go through wildlife site as stated in Policy SER9b.	The Concept Statement for this policy states that access/egress for the sites identified in Policy BFR1, SER9b and NEL3 should not go through the Local Wildlife Site (paragraph 3.276).
<p>The following needs to be considered:</p> <ul style="list-style-type: none"> • access from the road/track to BFR1 and SER9b must be within 50 metres after the junction with Star Lane to minimise disruption of the local wildlife site • visibility splays may possibly be created on land in BFR1 • impact on road structure in BFR1 of traffic to/from SER9b • impact on dwellings of industrial traffic (NEL3) using one access/egress 	Access/egress arrangements would be considered in detail at the planning application stage.
Support for the allocation of NEL3 for new employment land to the south of Great Waking.	Support noted.
An alternative location for this site is suggested, further to the north of its proposed location, adjacent to the brickworks site.	Noted. This proposed alternative location was considered at the Discussion and Consultation Document stage (Option E19).
There would be plenty of scope to move the site further north so that it is sufficiently distant from housing areas, but not isolated.	Noted.
The likelihood of Star Lane Industrial Estate being redeveloped within the plan period is questionable. Were the existing employment site not to come forward as expected, an alternative housing allocation at site NEL3 can make up for the shortfall in supply.	Noted. However, the Council acknowledge that the site will not come forward in the early part of the plan period (the majority of the Industrial Estate is not included in the five-year land supply). Alternative employment land will be allocated (as proposed within NEL3) and the Council will work with landowners, developers, business representatives and other stakeholders to ensure this is delivered and that displaced businesses are suitably relocated.

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<p>The alternative housing option has been moved north towards the Brickworks development as there would no longer need to be a significant buffer as there would if the site were required for employment provision.</p>	<p>Noted.</p>
<p>The proposed site is poorly related to an existing built up area.</p>	<p>It is noted that the site is not adjacent to the residential settlement of Great Wakering.</p>
<p>It would be difficult to create defensible Green Belt boundaries around the site. While it is proposed that boundaries can be created through landscaping, the site identified cannot be provided with sufficient landscaping to create an adequate buffer and to provide sufficient replacement employment land, as the size of the site is restricted in area to 2.5 hectares.</p>	<p>A range of options for employment land to the south of Great Wakering has been considered, within the detailed assessments; Detailed Assessment of Potential Detailed Assessment of Potential Employment Sites (March 2012) and Detailed Assessment of Detailed Assessment of Potential Additional Employment Site Options (September 2012) and the Sustainability Appraisal.</p> <p>The Sustainability Appraisal (April 2013):</p> <p>“The detachment of the site and the fact that it does not follow natural boundaries along its northern, southern and eastern boundaries impacts on the defensibility of the Green Belt boundary, which would have negative sustainability implications. However, the separation of the site would ensure residential amenity for the neighbouring proposed residential development (Policy BFR1) and would have a positive effect through minimising the impact on the Local Wildlife Site.</p> <p>A substantial green buffer to the north, east and south would positively impact on the defensibility of the Green Belt boundary, residential amenity and the nearby Local Wildlife Site.” (page 64).</p> <p>The 2.5 hectare site would compensate for the loss of the northern section of Star Lane Industrial Estate as set out in Detailed Assessment of Potential Additional Employment Site Options (September 2012).</p>

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<p>The location of the site, approximately half way between Great Wakering and Southend would encourage coalescence, particularly given the lack of defensible Green Belt boundaries.</p>	<p>The site, as above, is not adjacent to the residential settlement, and the Concept Statement requires that significant green buffers accommodate the development of the site to enhance the defensibility of the Green Belt boundary.</p>
<p>The site is close to the Star Lane Pits Local Wildlife Site and it is proposed that the development could use the existing vehicular access to this wildlife site. No details of this proposed access are provided, and the location of the existing access is a significant distance away from the proposed site. There is potential that this arrangement will encourage development between the existing access and the allocated site, leading to coalescence. The proximity to the wildlife site may also raise environmental concerns.</p>	<p>Detailed access arrangements will be determined in consultation with relevant officers at the planning application stage. However, the Concept Statement requires that one access/egress point linking three developments (BFR1, SER9b and NEL3) to Star Lane should be considered “to avoid a proliferation of access/egress roads” (page 92). It also acknowledges that vehicular access to NEL3 will be provided “through the green buffer to the north of the site” (page 92). The green buffer would provide a buffer between the site and the Local Wildlife Site.</p>
<p>The identified site is not consistent with the NPPF, in particular Section 9 which concerns protecting Green Belt land. Local planning authorities should define boundaries clearly, using physical features that are readily recognisable and that are likely to be permanent.</p> <p>The landowner(s) did not submit representations supporting the allocation of this proposed site during the 2010 consultation. This calls into question the deliverability of the proposed allocation.</p> <p>The west of Tithe Park is the most sustainable option when considered against the other alternatives and should be allocated instead within this policy.</p> <p>Two options for part of Tithe Park were put forward in the 2010 Allocations consultation (Options E23 and E24). In our response we supported an allocation but suggested the western end should be allocated.</p>	<p>Options entailing the allocation of land for Tithe Park (including Options E23 and E24) have been considered and assessed, including through sustainability appraisal. Options E23 and E24 were rejected as they were considered to promote coalescence between Shoeburyness and Great Wakering. Options E23 and E24 adjoin Shoeburyness and would be functionally separate from Great Wakering, for which this local employment allocation is intended.</p>

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<p>The Detailed Assessment of Potential Employment Sites considers Tithe Park as a whole (approximately 35 ha) and asserts that the size of the site would promote coalescence between Great Wakering and Shoebury. The previous options E23 and E24 are not considered in this document, nor is our previous suggestion of allocating the western side of the site.</p> <p>The site is available and deliverable, it would create a defensible Green Belt boundary, the eastern edge can accommodate a landscaping buffer, it would not encourage coalescence, lesser landscape impact, proximity to shops and services in Great Wakering and Southend, it is accessible to Great Wakering residents, accessible by public transport, not in proximity to the Local Wildlife Site, and is not within a flood zone.</p>	
<p>This policy relates to a single parcel, south of the brickworks; it would be detached from the existing settlement and would extend further south than the existing settlement, and be in close proximity to the boundary with Southend. In addition, it would also have a potential conflict with other allocations proposed for Great Wakering location (BFR1 and SER9).</p>	<p>The proposed allocation is not considered to conflict with BFR1 and SER9.</p>
<p>This location would be further away from public transport and existing services and facilities than the existing industrial estate that it seeks to replace, which means that it would be in not as sustainable location.</p>	<p>Disagree. All of the options considered for the allocation of new employment land to the south of Great Wakering would be in proximity to a bus route which runs along Star Lane as set out in the detailed assessment of the options (Detailed Assessment of Potential Employment Sites March 2012).</p> <p>It is also noted that whilst the proposed employment land would be located further to the south of the village, the Sustainability Appraisal (April 2013) concluded that:</p> <p>“the separation of the site would ensure residential amenity for the neighbouring proposed residential development (Policy BFR1) and would have a positive effect through minimising the impact on the Local Wildlife</p>

Rochford District Council – Local Development Framework Allocations Document: Consultation Statement

Issues Raised	Initial Officer Comments
	Site.” (page 64).
The locations of commercial accommodation in the proposed location would not accord with the locational requirements detailed within the NPPF.	It is unclear to which part of the NPPF this comment specifically refers. The Council is of the view that the Allocations Document complies with the NPPF.
As Star Lane Industrial Estate is a sustainable location, a more sustainable approach would be to redevelop the industrial park with a commercial scheme with a design of unit that is flexible enough to accommodate a range of employment uses.	The Council acknowledge that the site will not come forward in the early part of the plan period (the majority of the Industrial Estate is not included in the five-year land supply). Alternative employment land will be allocated (as proposed within NEL3) and the Council will work with landowners, developers, business representatives and other stakeholders to ensure this is delivered and that displaced businesses are suitably relocated.
The idea of de-allocating employment land in a sustainable location in order that it can be allocated for housing and then identifying new employment sites in less sustainable locations than the existing site is a contradiction.	Employment and residential uses are different land uses. Sites in use as employment land may be more appropriately used for residential (and indeed, vice versa).
The preference for future employment and housing provision should be to take a co-ordinated approach to the release of Green Belt land, and the requirements for employment and housing land considered together to limit the potential loss of Green Belt to the most sustainable locations, accessible by a range of means (including public transport), and with defensible boundaries.	The provision of housing and employment land has been considered together both within development of the Core Strategy and Allocations Document.
Concern that this allocation would likely be constrained by wildlife and other ecological matters related to the Star Lane Local Wildlife Site, would contribute to the potential coalescence of between Great Wakering and Shoeburyness and would encourage development in a locally sensitive landscape.	The proposed allocations adjacent to the Local Wildlife Site (SER9b and NEL3) have been considered and assessed in detail within both the Sustainability Appraisal and the Detailed Assessment of Potential Residential Site Options (September 2012). Issues, including potential impact on the Local Wildlife Site and coalescence have been carefully considered.

Rochford District Council – Local Development Framework Allocations Document: Consultation Statement

Issues Raised	Initial Officer Comments
Policy NEL4	
There is adequate space for the proposed development around the airport, whilst retaining the brickfield cottages. The cottages should be preserved.	Development to the north of the airport is addressed within the emerging London Southend Airport and Environs Joint Area Action Plan.
The land is a busy route for cyclists, walkers and horses and etc. and should be retained.	Development to the north of the airport, including pedestrian, cycle and bridleway routes, is addressed within the emerging London Southend Airport and Environs Joint Area Action Plan.
Policy ELA1	
Support for the allocation, but the precise boundaries of site R35. Star Lane Pits should be reviewed as part of the allocations process to exclude an area along the western boundary.	The proposed allocation for the Local Wildlife Site to the east of Star Lane is based on the 2007 Local Wildlife Site Review.
The present site boundaries include large areas of scrub land containing spoil heaps from the adjacent brick workings. This land, which has no ecological value, provides an opportunity for new semi natural open space and pedestrian links. The respondent's ecologist has assessed the land and confirmed that it should be excluded from site R35.	The proposed allocation for the Local Wildlife Site to the east of Star Lane is based on the 2007 Local Wildlife Site Review.
Policy EDU3	
Support the proposal which would enable the school to expand in order to meet the needs of the additional dwellings proposed by Policies SER5 and SER8.	Support noted.
Policy OSL1	
Support Policy OSL1 which seeks to protect identified areas of public	Support noted.

Rochford District Council – Local Development Framework Allocations Document: Consultation Statement

Issues Raised	Initial Officer Comments
space.	
If any of these areas are lost (wholly or in part), it would be necessary to provide replacement areas and due to the characteristics of the area this would require the loss of areas of Green Belt.	Policy CLT5 of the Core Strategy seeks to protect existing open space, in particular parks, amenity areas, allotments, playing pitches and other forms of open space that has a high townscape value or is intrinsic to the character of the area.
All residential allocations should include sufficient areas of public space to meet the needs of the proposed residents.	Whilst Policy OSL2 sets out specifically where open space will be required to accompany residential development (paragra8.12), Core Strategy Policy CLT5 seeks to promote new forms of open space include parks and amenity areas.
Policy OSL2	
Support Policy OSL2 and support the integration of new open space as part of all residential developments.	Support noted.
The space provided should be proportionate to the scale of the development and take into account the sites specific characteristics, which could be used to establish defensible Green Belt boundaries.	Each Concept Statement, based on the number of dwellings proposed for each site and the recommendations within the Open Space Study 2009, sets out open space requirements, including natural/semi-natural greenspace and amenity space. Green buffers have also been included as a requirement, where appropriate to strengthen Green Belt boundaries and enhance amenity. The Concept Statements, however, are not considered to be overly prescriptive in the location of open space, with the exception of flood risk areas which must accommodate greenspace. The detailed design of any development will be determined at the planning application stage.
Policy OSL3	
Support Policy OSL3 which protects existing leisure facilities.	Support noted.

Rochford District Council – Local Development Framework Allocations Document: Consultation Statement

Issues Raised	Initial Officer Comments
<p>If any of these facilities are lost, in order to ensure that there was not a shortfall, it would be necessary to provide replacements and due to the characteristics of the area this would require the loss of areas of Green Belt.</p>	<p>The leisure facilities identified in the policy are proposed to be protected.</p>
<p>Town Centre and Primary Shopping Area Boundary Allocations</p>	
<p>The Council has not undertaken traffic assessments for: the Core Strategy, Hockley Area Action Plan, Rochford Area Action Plan or Rayleigh Area Action Plan despite the fact that Essex County Council Highways state that Traffic Assessments should be submitted for all strategic developments.</p>	<p>Traffic assessments are required to accompany strategic planning applications. Essex County Council Highways would only require area wide traffic assessments to be carried out for development plan documents if they have significant concerns about the impact on the transport network.</p>
<p>There is no strategy for highways in the District. This needs to be addressed before housing plans are determined.</p>	<p>The Council has considered highway infrastructure throughout the preparation of the Core Strategy and the Allocations Document. The Core Strategy (Appendix H1 in particular) identifies where improvements to the highway network would be required to accompany residential development in Policies H2 and H3. This was scrutinised during the Core Strategy examination.</p> <p>Essex County Council as the highways authority have been closely consulted throughout the process of the Core Strategy and the Allocations DPD and as such have considered the cumulative, and individual, impact of the developments across the District on the highway network. The consideration of potential sites has included views from the Highways Authority. This was done on an individual location basis and on a cumulative basis which assessed the impact of the cumulative development.</p>
<p>Implementation, Delivery and Monitoring</p>	
<p>It is unclear how the cumulative impact of the infrastructural needs of the</p>	<p>The infrastructure required to accompany proposed residential development</p>

Rochford District Council – Local Development Framework Allocations Document: Consultation Statement

Issues Raised	Initial Officer Comments
new developments identified for the West Great Wakering area (BFR1, NEL3, SER9a and SER9b) are to be addressed, particularly on Star Lane and the High Street.	on Star Lane Industrial Estate (BFR1) and to the west of Great Wakering (SER9) are set out in Appendix H1 of the Core Strategy and within the policies (paragraph 2.10 and 3.253).
Without taking this overall approach, the risk is that piecemeal changes are made on an individual development basis.	The Council has prepared the Core Strategy and subsequently the Allocations Document in consultation with numerous infrastructure providers, including Essex County Council (highways, education, and public transport departments), Anglian Water, Environment Agency and the South East Essex Primary Care Trust.
An assessment of the cumulative impact of individual developments on the transport network and mitigation measures should be undertaken before developments are implemented.	Essex County Council as the highways authority have been closely consulted throughout the process of the Core Strategy and the Allocations DPD and as such have considered the cumulative, and individual, impact of the developments across the District on the highway network. The consideration of potential sites has included views from the Highways Authority. This was done on an individual location basis and on a cumulative basis which assessed the impact of the cumulative development.
An assessment of other types of infrastructure should also be undertaken and any implementation issues for improvements should be identified at the earliest opportunity.	The Council has prepared the Core Strategy and subsequently the Allocations Document in consultation with numerous infrastructure providers, including Essex County Council (highways, education, and public transport departments), Anglian Water, Environment Agency and the South East Essex Primary Care Trust.
Although the Plan requires SER9b, BFR1 and NEL3 to be comprehensively planned, there should be explicit reference to emphasise that a cohesive and coherent planning and management approach will be taken across these developments, and how this approach will be implemented.	The Concept Statements for the proposed sites identified in policies SER9b, BFR1 and NEL3 are considered to be appropriate in ensuring that development of the sites than come forward earlier in the plan period would enable integration with sites delivered later.
The cumulative impacts of proposed developments in proximity to the Star Lane Pits Local Wildlife Site should be identified, managed and	The Concept Statements for the sites identified in policies SER9b and BFR1 requires a management plan for the Local Wildlife Site to be prepared. The

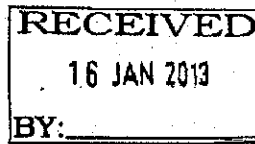
Rochford District Council – Local Development Framework Allocations Document: Consultation Statement

Issues Raised	Initial Officer Comments
mitigated against of the before any individual development takes place.	Plan also proposes that a green buffer along the eastern boundary of BFR1 should be developed and between SER9b and the Local Wildlife Site to minimise disturbance.
The identification under SER9b of the potential biodiversity value of the land to the west of Alexandra Road is welcomed. An essential part of each development application will be that adequate management and mitigation proposals are made to ensure the protection of such habitats, and that adequate buffering occurs between existing residential areas and new developments.	This would need to be considered at the planning application stage.
Proposals Map	
Hullbridge does not have the infrastructure to support the number of dwellings proposed.	<p>The Council has prepared the Core Strategy and subsequently the Allocations Document in consultation with numerous infrastructure providers, including Essex County Council (highways, education, and public transport departments), Anglian Water, Environment Agency and the South East Essex Primary Care Trust.</p> <p>Improvements to infrastructure required to accompany development of proposed sites are set out in Appendix H1 of the Core Strategy and within the policy (paragraph 3.158).</p>
Watery Lane floods often, which impacts on the wider highway network.	<p>Local highway capacity and infrastructure improvements, including to Watery Lane and Watery Lane/Hullbridge Road junction will be required to accompany development of the site identified as SER6. The precise details will be determined at the planning application stage.</p> <p>Essex County Council is responsible for addressing the current issues with flooding along Watery Lane, and has recently undertaken a programme of ditch clearing to alleviate these issues.</p>

Rochford District Council – Local Development Framework Allocations Document: Consultation Statement

Issues Raised	Initial Officer Comments
The village has a primary school but no secondary school. More children will have a negative impact.	The Council has worked closely with Essex County Council Schools Children and Families service throughout the production of the Core Strategy DPD and this document to ensure that schools have the capacity to support increased population, and if not where was the most appropriate site to locate any new educational facilities. Provision for increased capacity at existing secondary schools has also been accounted for.
The doctor's surgery is at capacity.	The Council has prepared the Core Strategy and subsequently the Allocations Document in consultation with numerous infrastructure providers, including the South East Essex Primary Care Trust.

Appendix 5 – Late Representations Received



Head of Planning & Transportation
Shaun Scrutton, BSc(Hons), Dip TP,
MRTPI, IHBC, MBA, MCMI

Ask for: Planning Policy
Direct Dial: 01702 318191
Email: planning.policy@rochford.gov.uk

My Ref: ALLOC/HAAP2012

Date: 29 November 2012

Dear Sir/Madam

Have your say on the future development of the District: consultation on the Allocations Submission Document and Hockley Area Action Plan Submission Document

The proposed final versions of the Allocations Document and the Hockley Area Action Plan (HAAP) have been published. These documents form part of the Local Development Framework or LDF – a collection of documents that will determine how the District develops in the future.

Comments on the soundness and legal compliance of these documents may be submitted between noon on 29 November 2012 and 5pm on 25 January 2013.

The quickest and easiest way to submit comments is via our online system at this link:
<http://rochford.jdi-consult.net/ldf/>.

Comments may be submitted by selecting the relevant document then clicking on the pen symbol next to the option on which you wish to comment. Before you submit comments for the first time you will need to register on the system. This is a simple process requiring a valid email address. **If you are already registered on Rochford District Council's online consultation system you can use the same login and do not need to re-register.**

We recommend that you also visit www.rochford.gov.uk to view the documents, access background information and, if required, obtain help on using the online consultation system.

We recognise that not everyone has access to the Internet and that it is important that no one is excluded from participating. If you wish to submit your views but are unable to do so

Council Offices, South Street, Rochford, Essex SS4 1BW
Phone: 01702 546366 Fax: 01702 545737 DX: 39751 Rochford
Website: www.rochford.gov.uk



RECEIVED

28.01.2013

Support Services

online, please contact the Planning Policy team on 01702 318191.

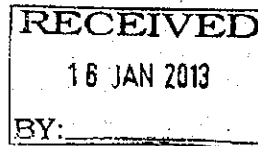
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Please note: This is a formal consultation. Representations will only be regarded as duly made if supplied on the official representation form or made directly via the online consultation system. Comments will be available to view on the online system as they are submitted, although please note that there may be a time delay between submission and appearance online.

Yours faithfully


Shaun Scrutton
Head of Planning & Transportation

I think before more houses are built and many more people inhabit Great Wakering, Wakering itself needs to be made ready for them as regards infrastructure and facilities. At the moment in town Wakering has a very neglected and 'shabby air' generally, what a shame the sports centre was closed shops closing and very bad pavements. Other areas of trees have had considerable amount of money spent a town eg. Royston & Rayleigh. Is it not now Wakering's turn? A few trees would go amiss either!



Head of Planning & Transportation
Shaun Scrutton, BSc(Hons), Dip TP,
MRTPI, IHBC, MBA, MCMI

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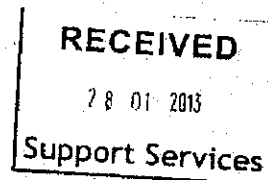
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Yours faithfully


Shaun Scrutton
Head of Planning & Transportation


Great Wakering needs to improve its amenities first, before embarking on more housing. We need a decent Sports Hall to keep younger population entertained & out of trouble, and older adults fit. The pavements are utterly disgraceful, dreadful to walk on. Why not have a few trees to embellish the look. These are a few ideas just for starters. Great Wakering has had very little spent on it compared to other areas in the Rochford area. WHY?? Do our councillors stand up and ask questions, or are we just to 'shut a number to count'!

RECEIVED

15 JAN 2013

BY: _____

GREAT WAKERING PARISH COUNCIL
COUNCIL OFFICE, LITTLE WAKERING HALL LANE,
GREAT WAKERING, ESSEX, SS3 0HH.
Telephone 01702 219343
e-mail: gwaking@greatwaking-pc.gov.uk

PUBLIC INFORMATION EVENING
Village Memorial Hall
15th January, 2013
8.00 pm – 10.00 pm

Rochford District Council have recently issued their Allocations Submission Development Plan Document in respect of their proposed long term development plans for Great Waking.

The sites that are being considered are the Green Belt land between Southend Road, Barrow Hall Road and Little Waking Road and also further development adjacent to the Star Lane Brickworks site. We are looking at the possibility of approximately a further 250 houses being built in Great Waking and this is in addition to the houses already scheduled for the Star Lane Brickworks site.

Representations to Rochford District Council need to be made by 25th January, 2013 and your Parish Council feel it is important that we obtain the views of the public so that any representations we make do reflect the public's views. We are holding a Public Meeting at the Great Waking Memorial Hall at 8.00 pm on 15th January, 2013 and will be using this meeting to obtain your views on the proposals.

RECEIVED

28 01 2013

Support Services

GREAT WAKERING PARISH COUNCIL

PUBLIC INFORMATION EVENING

Please do make every effort to attend but, if you are not able to do so, please let the Parish Council know your views below. Alternatively you can make Representations direct to Rochford District Council on the official representation form or directly via the online consultation system at

<http://rochford.jdi-consult.net/ldf>

This should be done by 25th January 2013.

If you are not able to submit your views online, copies of the representation form are available at the Parish Office.

Comments

- ① SHOULD GREEN BELT LAND NOT REMAIN GREEN BELT? ONCE IT IS GONE IT CANNOT BE REPLACED. MANY WILL LOSE THE RURAL/FARMLAND VIEWS WHICH IS AN ATTRACTION TO LIVING HERE.
- ② WITH CURRENT PROBLEMS BEING EXPERIENCED WITH PROPERTY INS. BECAUSE OF POTENTIAL FLOOD RISK, WOULD IT NOT BE SMARTER TO BUILD ELSEWHERE?
- ③ WAKERING ALREADY HAS BARELY SUFFICIENT, AND IN SOME AREAS INADEQUATE, INFRASTRUCTURE:
 - i) EXPAND/ENLARGE PRIMARY SCHOOL
 - ii) SECONDARY SCHOOL
 - iii) FACILITIES FOR CHILDREN & YOUTHS
 - iv) BETTER PUBLIC TRANSPORT IN & OUT OF VILLAGE
 - v) MORE/BETTER ACCESS ROADS IN & OUT OF VILLAGE
 - vi) SHOPS, CASHPOINTS, PETROL!

Name

Address

7th January, 2013

RECEIVED

15 JAN 2013

BY:

GREAT WAKERING PARISH COUNCIL
COUNCIL OFFICE, LITTLE WAKERING HALL LANE,
GREAT WAKERING, ESSEX, SS3 0HH.
Telephone 01702 219343
e-mail: gwaking@greatwaking-pc.gov.uk

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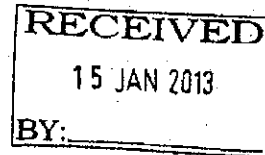
Comments

THE GREAT WORRY ABOUT SO MANY MORE HOUSES
PROPOSED TO BE BUILT IS THAT THE AMOUNT OF CARS THIS
WILL BRING INTO ROADS WHICH ALREADY GET CONGESTED AND
WHICH WILL BECOME MUCH WORSE AND WHY ON EARTH DO
MORE PROPERTIES HAVE TO BE BUILT IN AN ALREADY
OVERCROWDED VILLAGE (WHICH IS NOT A VILLAGE ANY MORE)
THE SCHOOLS & DOCTORS ARE ALREADY FULL WHICH IS ANOTHER
MAJOR CONCERN AND DRAINAGE BEING ANOTHER ESPECIALLY
IN VIEW OF THE FACT THAT SOME OF US ARE CONSIDERED
TO BE IN A FLOOD AREA SO WHAT WILL THE CONSEQUENCES
OF ALL THIS BE. NO ONE EVER THINKS THINGS THROUGH AS
TO WHAT WILL HAPPEN POST BUILDING. ALSO IN THIS YEAR OF
2013 PLEASE CAN SOMETHING BE DONE ABOUT THE TOP END OF
NORTH ST. AS IT IS BECOMING MORE & MORE DANGEROUS TO WALK ALONG

Name

Address

7th January, 2013



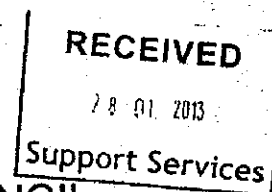
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GREAT WAKERING PARISH COUNCIL

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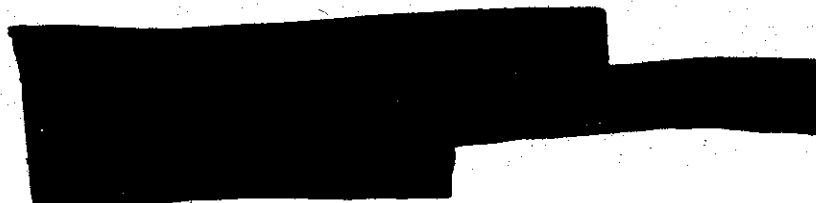
If you are not able to submit your views online, copies of the representation form are available at the Parish Office.

Comments

Wakering infrastructure and school, medical centre, lack of facilities for the younger population, etc. are already pushed to capacity. There is a waiting list for Wakering School last we heard.

Also, we don't agree with building on green belt land.

Name
Address



7th January, 2013

Great Waking

From: [REDACTED]
Sent: 11 January 2013 14:48
To: gwaking@greatwaking-pc.gov.uk
Subject: developmen in waking

Thank you for your advisory letter received 11.01.13 with regard to the further development in the village, I regret that due to health problems I shall be unable attend the meeting on 15th January . These proposals do not surprise me, it was obvious that as the brickfield became available that the next move would be to "fill in the remainder of the adjacent land " the same applies to the land between Southend Road and Barrow Hall Road .I accept that development is necessary, but surely this must be accompanied by adequate improvement in the services. It would not be unreasonable to assume that these proposals would mean an influx of at least 200 additional children to be educated, and a new school on at least part of the land would be a priority, paid for at least in part; by the developers , at the time of the last meeting with the owners of the Brickfield site they were not aware of the fact that children were being ferried to school, has there been any feedback on the points raised by our Parish Council with Rochford Council, perhaps you could advise me in due course. Regards [REDACTED]

RECEIVED

28.01.2013

Support Services

Great Woking

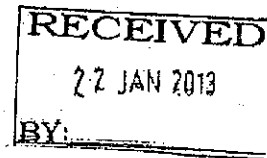
From: [REDACTED]
Sent: 13 January 2013 19:07
To: gwaking@greatwoking-pc.gov.uk

I have lived in Woking village for over 30 years, the emphasis being on 'village'. By building more and more houses, not only does Woking start to lose its village status, I wonder how the infrastructure shall cope i.e. Doctors and Schools etc.

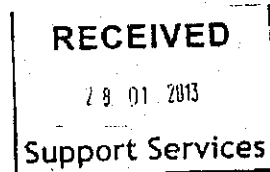
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18 01 2013

Support Services



Great Waking Parish Council,
Council Office,
Little Waking Hall Lane,
Great Waking,
Essex, SS3 0HH



21st January 2013

Re; Proposed Long term (Housing) Development Plans

Dear Sirs,

Thank You for the Invitation to the meeting on the 15th January at the Village Memorial Hall, the information given at the meeting was disturbing to say the least.

I hope that you will present on our behalf our opposition to the proposal in the strongest terms as we feel that it is a non starter.

My reasoning for opposition is as follows;

1.

The Infrastructure to support this expansion is inadequate, 250 homes will usually bring about 500 cars, the roads are of insufficient quality and quantity to support extra vehicular movement around the peak travel times of work and school, even now it is difficult to travel out of Waking between 7:30 and 9:00AM.

The exit routes from this corner of Essex have not been substantially improved since the upgrading of the A127 in the 1930's the system is now hopelessly overloaded.

These new people will be commuting out as there are No jobs in Waking. Any business owner would find Waking low on His/Her expansion list as it is difficult to get to with Southends restrictive access routes.

A dual carriageway from somewhere like the Angel PH going across the River Roach and joining the A130 by Rettendon would be needed to make expansion of Business an attractive proposition.

2.

I find the plan to bulldoze the Star Lane Factory Estate and rebuild it just down the road ridiculous. Build more factory space by all means but don't remove what little we do have.

3.

How does this proposed development agree with Rochford Councils own Green Belt Statement which is as follows:-

"Planning Policy Guidance Note 2 – Green Belts (PPG2). The most important aspect of the Green Belt is its openness. PPG2 states that the five purposes of including land within the Green Belt are as follows:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns from merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land."

The development goes against all of the above, maybe the Policy Makers need to read their own bumf instead of just churning out more

4.

I wonder about the suitability of the land for building upon as if the land at the back of the Factory estate has had its Clay layer removed for Brick making does this not mean that it is too unstable for building?

I am sure that I remember a similar problem on the Shoebury Brickfields.

5.

There is also the problem of Doctors, Dentists Schools and local shops they could walk to for these proposed extra people

Wakering is a nice place to live and a big influx of people treating the Village as a dormitory ghetto will not enhance it.

Yours Sincerely,

[REDACTED]
[REDACTED]
[REDACTED]

GREAT WAKERING PARISH COUNCIL
COUNCIL OFFICE, LITTLE WAKERING HALL LANE,
GREAT WAKERING, ESSEX, SS3 0HH.

Telephone 01702 219343

e-mail: gwaking@greatwaking-pc.gov.uk

PUBLIC INFORMATION EVENING

Village Memorial Hall

15th January, 2013

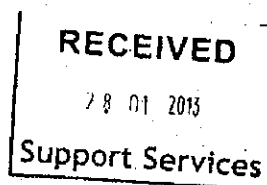
8.00 pm – 10.00 pm

Rochford District Council have recently issued their Allocations Submission Development Plan Document in respect of their proposed long term development plans for Great Waking.

The sites that are being considered are the Green Belt land between Southend Road, Barrow Hall Road and Little Waking Road and also further development adjacent to the Star Lane Brickworks site. We are looking at the possibility of approximately a further 250 houses being built in Great Waking and this is in addition to the houses already scheduled for the Star Lane Brickworks site.

Representations to Rochford District Council need to be made by 25th January, 2013 and your Parish Council feel it is important that we obtain the views of the public so that any representations we make do reflect the public's views.

We are holding a Public Meeting at the Great Waking Memorial Hall at 8.00 pm on 15th January, 2013 and will be using this meeting to obtain your views on the proposals.



17 January 2013

**Comments on the Rochford District Council
Allocation Submission Development Plan Document**

I am against any future development in Great Wakering and especially in the Green belt.

The village is losing its identity with the increased number of new houses and will soon become just a suburb of Southend. The majority of people chose to live in the Great Wakering area because of village nature and the fact that it is quiet and not congested, with plenty of fields and open spaces. This is something I feel should be strongly protected.

The infrastructure and services have not been improved even after the recent new housing developments have been completed. The high street is becoming a dangerous place to walk with children because of the narrow nature and the number of cars. The school run is very chaotic with many cars parking and mounting pavements when I walk my child to school. Any new housing can only make this worse.

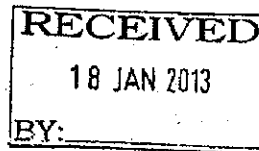
Barrow Hall road is very narrow and in some places two cars can only just pass each other. Southend Road is also a dangerous road with many accidents and additional housing will only add to it. It is becoming very difficult for residents to get "past" Southend and out to work as the roads are so congested and more housing this side of Southend will make it work.

The Great Wakering School is already oversubscribed with class sizes above average and in my sons case they already have 32 pupils which I believe is above the recommended size.

It is very disappointing that the local council / Government do nothing about the half of Great Wakering which at risk of flooding due to poorly maintained sea defences but are happy to add more housing without improving the circumstances for people who already live in the area. It seems like the rights of potential new residents are being put before local residents who are have lived for many years in the area and are "Great Wakering".

[Redacted signature block]

Telephone: [Redacted]
Mobile: [Redacted]
Email: [Redacted]



GREAT WAKERING PARISH COUNCIL

PUBLIC INFORMATION EVENING

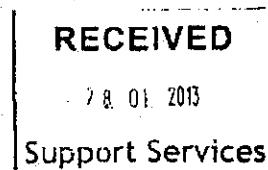
Please do make every effort to attend but, if you are not able to do so, please let the Parish Council know your views below. Alternatively you can make Representations direct to Rochford District Council on the official representation form or directly via the online consultation system at

<http://rochford.jdi-consult.net/ldf>

This should be done by 25th January 2013.

If you are not able to submit your views online, copies of the representation form are available at the Parish Office.

Comments



See Attached

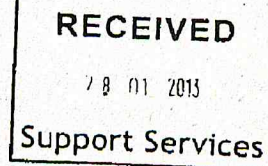
Name
Address

[Redacted Name]
[Redacted Address]
[Redacted Address]

7th January, 2013

Great Waking

From: [REDACTED]
Sent: 11 January 2013 23:06
To: gwaking@greatwaking-pc.gov.uk
Subject: Fwd: Representation received. [REDACTED]



Hi PC,

I've not been able to join your meetings, to be honest I'm not normally a person who would stand up and complain about local issues but given the problems I've had recently simply enrolling my daughter into school I do feel compelled to say something and have this evening completed the online form.

My sister has also experienced problems and was vocal in approaching and appearing in the evening echo as her daughter was also not given and still does not have a place at her local primary school.

Regards,

[REDACTED]

----- Forwarded message -----

From: Rochford District Council <no-reply@idi-consult.net>
Date: Fri, Jan 11, 2013 at 10:57 PM
Subject: Representation received. [REDACTED]
To: [REDACTED]

[REDACTED]

Representation ID: 28433
Document: Allocations Submission Document
Section: Policy BFR1 - Star Lane Industrial Estate, Great Waking
Support/Object: Object

How on earth can you propose / consider building these dwellings when the current local infrastructure is stretched beyond capacity. I live within a 4 mins walk to Great Waking Primary school yet my daughter wasn't offered a space and had to join Barling primary without any of her pre school friends, instead of walking her to school I have to drive her a couple of miles down the road to the next school. My sister who lives in the village still doesn't have her 5yr old daughter in school due to lack of places within this area. If even just 25% of the dwellings have 1 child where will they go?

SUMMARY

My summary is simple, my child who has lived in this village all her life has not been able to join her local primary with her pre-school friends. I had to enroll my son at 5 months into preschool in the village in order to secure him a place.

I work full time in London and cannot see a GP when sick but have to almost plan it.

The local school could not cope with the increase in residence nor could the medical centre.

CHANGE TO PLAN

You cannot propose building these dwellings and build a youth club to compensate. The problem with school spaces and subscription to the local medical centre take priority.

RECEIVED

28 01 2013

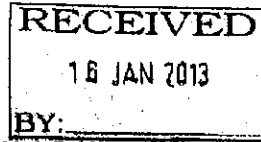
Support Services

The document is unsound because it is not:

- i. Positively prepared

How you would like your representation to be considered at the independent examination: Written representation.

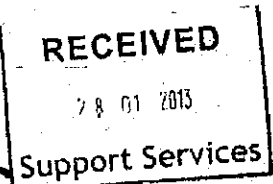
Thank you for your representation, which has been received by Rochford District Council. You will receive further communication confirming your representation in due course.



GREAT WAKERING PARISH COUNCIL
COUNCIL OFFICE, LITTLE WAKERING HALL LANE,
GREAT WAKERING, ESSEX, SS3 0HH.

Telephone 01702 219343

e-mail: gwakering@greatwakering-pc.gov.uk



PUBLIC INFORMATION EVENING

Village Memorial Hall

15th January, 2013

8.00 pm – 10.00 pm

Rochford District Council have recently issued their Allocations Submission Development Plan Document in respect of their proposed long term development plans for Great Wakering.

The sites that are being considered are the Green Belt land between Southend Road, Barrow Hall Road and Little Wakering Road and also further development adjacent to the Star Lane Brickworks site. We are looking at the possibility of approximately a further 250 houses being built in Great Wakering and this is in addition to the houses already scheduled for the Star Lane Brickworks site.

Representations to Rochford District Council need to be made by 25th January, 2013 and your Parish Council feel it is important that we obtain the views of the public so that any representations we make do reflect the public's views.

We are holding a Public Meeting at the Great Wakering Memorial Hall at 8.00 pm on 15th January, 2013 and will be using this meeting to obtain your views on the proposals.

GREAT WAKERING PARISH COUNCIL

PUBLIC INFORMATION EVENING

Please do make every effort to attend but, if you are not able to do so, please let the Parish Council know your views below. Alternatively you can make Representations direct to Rochford District Council on the official representation form or directly via the online consultation system at

<http://rochford.jdi-consult.net/ldf>

This should be done by 25th January 2013.

If you are not able to submit your views online, copies of the representation form are available at the Parish Office.

Name

Address

7th January, 2013

RECEIVED

17 8 01 2013

Support Services

The following points are offered for consideration as issues on which the Parish Council might wish to make representations to the Planning Authority regarding the implications for the village of the proposed set of developments:

Cumulative Impact on Great Wakering

The level of development proposed for West Great Wakering (WGW) is considerable for such a relatively small geographical area, leading to an overall population increase of approx 1250 people.

Assuming the Star Lane Brickworks development goes ahead, followed by the re-locating of the other part of the Star Lane Industrial Estate and its subsequent redevelopment. These developments would result in approx 225 dwellings increasing the village population by approx 500.

This would be followed by the development of 250 new homes (at least) under the WGW options, giving a further population increase of up to 750.

This also means that this small part of the village can look forward to the best part of a decade of almost continuous development.

Three key questions for consideration

1. With this level of major development is **WGW being asked to accommodate a disproportionate level of residential development**, when compared with the other parts of the district identified in the Allocations proposals?
2. **What consideration have the Planning Authority given to assessing the implications of this level of almost continuous development on the capability of the infrastructure and social fabric of Great Wakering, to cope with the proposed level of population increase?**
3. **It is completely unclear who will manage and coordinate this level of development over this extended period?** Given that it is a significant level of that development is centred on Star Lane.

It is suggested that the Planning Authority be approached to explain how they intend to ensure that impacts are minimised and mitigated for residents during this extended period of development.

Impact on rest of the village

This level of major development at the west end of the village will have a significant impact on everyone in Great Wakering. This is particularly in respect of road transport i.e. given that the majority of travel to/from the village is out through the west of the village using the High Street and Star Lane.

Significantly increased traffic levels can be anticipated using the only other way in / out of the village i.e. Poynters Lane. This will put increased pressure on the Poynters Lane / Star Lane junction that is not well suited to such an increased level of use. The upgrading of this junction **MUST** form one of the earliest elements in these developments to help mitigate the problems that will arise from such heavier use.

Impact on existing wildlife facilities

The Star Lane Pits Local Wildlife Site sits right in the middle of this proposed set of developments.

Much greater clarity is required from the Planning Authority as to how the pressures and risks introduced to this precious resource by these developments, are to be managed and mitigated accordingly throughout the whole period of development.

GREAT WAKERING PARISH COUNCIL

**COUNCIL OFFICES
LITTLE WAKERING HALL LANE
GREAT WAKERING, ESSEX, SS3 0HH**

Telephone/Fax [REDACTED]
Email: [REDACTED]
Web site: www.greatwaking-pc.gov.uk

RECEIVED

28 01 2013

Support Services

22nd January, 2013

S. Scrutton,
Head of Planning and Transportation,
Rochford District Council,
South Street,
Rochford,
Essex, SS4 1BW.

Dear Shaun,

Local Development Framework – Allocations Submission Document

I refer to the above. Whilst we realise that this letter cannot be considered a formal response to your Document we felt it would be appropriate to write to let you know our concerns.

Great Waking Parish Council held a Public Information Evening on 15th January, 2013 to make the public aware of this document and to gauge the general views in respect of the proposals contained therein.

The meeting was attended by some one hundred and sixty five people and the general consensus of opinion from those attending was disappointment at the proposals. Eighteen people took the time to fill out questionnaires and these are enclosed for your information and so that you can understand the general feeling about the proposals.

Whilst it is realised that development is probably unavoidable it was felt that it would be preferable not to use the Green Belt land to the west of Little Waking Road. Similarly it was felt that the land currently used for Industrial purposes should be left as it is and any development should take place on the existing Brownfield Site.

I have also been asked to express our disappointment at the lack of time given for people to respond to the proposals. The fact that the document was issued just before the Christmas/New Year break was unfortunate. I have also been asked to

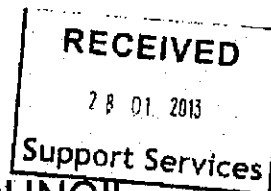
mention our disappointment that Rochford District Council were not able to send a representative to our Public Information Evening.

Finally, and at the appropriate time, we would appreciate it representatives of the Parish Council could meet with you to discuss the matter further.

I look forward to hearing from you.



Clerk to Great Wakering Parish Council



GREAT WAKERING PARISH COUNCIL
COUNCIL OFFICE, LITTLE WAKERING HALL LANE,
GREAT WAKERING, ESSEX, SS3 0HH.
Telephone 01702 219343
e-mail: gwaking@greatwaking-pc.gov.uk

PUBLIC INFORMATION EVENING
Village Memorial Hall
15th January, 2013
8.00 pm – 10.00 pm

Rochford District Council have recently issued their Allocations Submission Development Plan Document in respect of their proposed long term development plans for Great Waking.

The sites that are being considered are the Green Belt land between Southend Road, Barrow Hall Road and Little Waking Road and also further development adjacent to the Star Lane Brickworks site. We are looking at the possibility of approximately a further 250 houses being built in Great Waking and this is in addition to the houses already scheduled for the Star Lane Brickworks site.

Representations to Rochford District Council need to be made by 25th January, 2013 and your Parish Council feel it is important that we obtain the views of the public so that any representations we make do reflect the public's views. We are holding a Public Meeting at the Great Waking Memorial Hall at 8.00 pm on 15th January, 2013 and will be using this meeting to obtain your views on the proposals.

GREAT WAKERING PARISH COUNCIL

PUBLIC INFORMATION EVENING

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<http://rochford.jdi-consult.net/ldf>

This should be done by 25th January 2013.

If you are not able to submit your views online, copies of the representation form are available at the Parish Office.

Comments

Whilst it might be reasonable to build near
Horton. The Brownfield Site of the Star Lane Brick Works,
to significantly increase the no. of properties by building
on Green field sites is a step too far. There have not
been any significant improvements to the local infrastructure
in the time since we moved into Gt. Wakering in 1.1.1971.
It has had many new developments, Lee Butts, Conning Ave,
Seaview Drive, Haverhill Close, Victoria Drive plus
Home Farm, Meeson Meadows, Marcus Way plus
the odd infill. Whilst accepting that affordable housing
is needed if the younger generation are to be able
to stay in the village, what is meant by affordable?

Name

Address

7th January, 2013

The Parish & District Council are our only
avenue of approach in matters of local interest/impact.
We need you to represent our views!

GREAT WAKERING PARISH COUNCIL
COUNCIL OFFICE, LITTLE WAKERING HALL LANE,
GREAT WAKERING, ESSEX, SS3 0HH.

Telephone 01702 219343

e-mail: gwaking@greatwaking-pc.gov.uk

PUBLIC INFORMATION EVENING

Village Memorial Hall

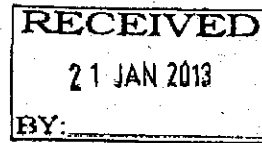
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GREAT WAKERING PARISH COUNCIL

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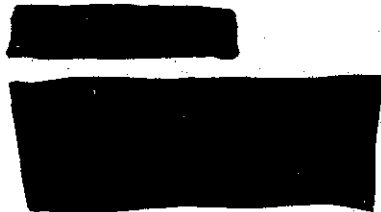
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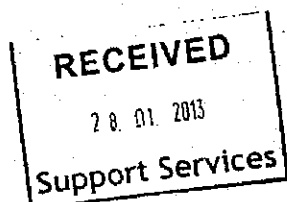
Comments

WE ARE AGAINST ANY FURTHER
DEVELOPMENT IN THE AREA
PARTICULARLY ONE THAT INVOLVES
GREEN BELT LAND. THERE ARE PLenty
OF BROWN FIELD SITES IN THE
ROCHFORD/SOUTHEND AREA THAT COULD
BE DEVELOPED.

Name
Address



7th January, 2013



GREAT WAKERING PARISH COUNCIL
COUNCIL OFFICE, LITTLE WAKERING HALL LANE,
GREAT WAKERING, ESSEX, SS3 0HH.
Telephone 01702 219343
e-mail: gwaking@greatwaking-pc.gov.uk

PUBLIC INFORMATION EVENING
Village Memorial Hall
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8.00 pm – 10.00 pm

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GREAT WAKERING PARISH COUNCIL

PUBLIC INFORMATION EVENING

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Comments NO BUILDING ON LAND USED FOR FOOD PRODUCTION, OR ON LAND WHICH HAS THE RISK OF FLOODING.

WITH THE AMOUNT OF DEVELOPMENT PROPOSED BRINGING IN ABOUT ANOTHER 2000 PEOPLE. CAN THE FOLLOWING COPE?

- MEDICAL CENTRE, LIMITED PARKING. ANOTHER SURGERY
- EDUCATION, MORE SCHOOLS
- POLICE
- DRINKING WATER
- WASTE WATER, SEWERAGE • INCREASED TRAFFIC
- EMPLOYMENT

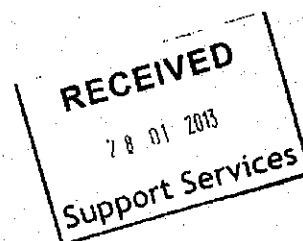
WHAT FINANCIAL INDUCEMENT WILL THERE BE TO ALLOW THAT AMOUNT OF DEVELOPMENT?

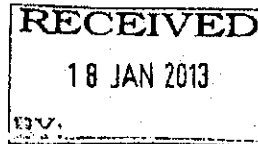
I DID NOT REALISE THAT THERE WERE THAT NUMBER OF PEOPLE IN THE 'VILLAGE' NEEDING HOUSING!

Name [REDACTED]

Address [REDACTED]

7th January, 2013





GREAT WAKERING PARISH COUNCIL
COUNCIL OFFICE, LITTLE WAKERING HALL LANE,
GREAT WAKERING, ESSEX, SS3 0HH.
Telephone 01702 219343
e-mail: gwakering@greatwakering-pc.gov.uk

PUBLIC INFORMATION EVENING
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GREAT WAKERING PARISH COUNCIL

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Comments

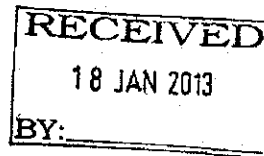
Great Wakering is a village with a thriving community. Don't spoil it by thinking that you can just build more dwellings. We don't want any, also, the services, schools, etc. cannot cope with more buildings. Also, it has been said by some members of R.D.C. Well, if you don't agree to R.D.C. proposals, they will just say where they will put dwellings. I think not, we have a voice and will use it.

Name
Address

[Redacted Name and Address]

7th January, 2013





GREAT WAKERING PARISH COUNCIL
COUNCIL OFFICE, LITTLE WAKERING HALL LANE,
GREAT WAKERING, ESSEX, SS3 0HH.
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GREAT WAKERING PARISH COUNCIL

PUBLIC INFORMATION EVENING

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<http://rochford.jdi-consult.net/ldf>

This should be done by 25th January 2013.

If you are not able to submit your views online, copies of the representation form are available at the Parish Office.

Comments

The pre-school has been open since Sept. 1978 and has full use of the WHOLE SITE. It is a very full and vibrant facility for 2yrs-5yrs children. We value our open field environment and do not wish to see development of any kind on our doorstep or elsewhere in the Village. We have a lovely village - keep it that way. We do not have any plans to change our location in the future -

Name
Address

[REDACTED]
[REDACTED]
[REDACTED]

7th January, 2013



Appendix 6 – Regulation 19 Notice

ROCHFORD DISTRICT COUNCIL

NOTICE OF THE PUBLICATION OF THE ROCHFORD DISTRICT LOCAL DEVELOPMENT FRAMEWORK ALLOCATIONS DEVELOPMENT PLAN DOCUMENT (SUBMISSION DOCUMENT)

Planning and Compulsory Purchase Act 2004 Town and Country Planning (Local Planning) Regulations 2012: Regulation 19

Rochford District Council has prepared an Allocations Development Plan Document Submission Document as part of its Local Development Framework which it proposes to submit to the Secretary of State under Regulation 22 of the above Regulations.

The Allocations Development Plan Document Submission Document and accompanying documents have been published in order for representations to be made prior to the submission of the Allocations Document to the Secretary of State for examination.

The Plan provides the detailed locations for new housing, employment and other land-use allocations proposed in the Core Strategy. The plan includes the proposals map for Rochford District. The area covered by the plan is Rochford District.

Representations can be made during the publication period which begins at noon on 29 November 2012 and ends at 5.00pm on 25 January 2013. Only representations received during this time will be considered. Late responses will not be accepted. Consultation representations will only be regarded as duly made if supplied on the representation form or made directly via the online consultation system.

The Plan, alongside a statement setting out how representations can be made, is available online via www.rochford.gov.uk; at Rochford Council Offices; and in the District's libraries.

Appendix 7(A) – Duty to Co-operate (Essex County Council)

**Notes of Meeting with Highway and Public Transport Representatives at
Essex County Council (ECC)
22nd February 2012**

Attendees:

Roy Lewis (ECC)
Mark Lawrence (ECC)
Katherine Wilkinson (ECC)
Richard Gravatt (ECC)
Samuel Hollingworth (RDC)
Natalie Hayward (RDC)

Residential Site Allocations

North of London Road

ECC advised that for a development of 550 homes two access points would be needed to serve it.

The potential for a bus route between Rawreth Lane and London Road and options to discourage car usage was discussed. It was discussed whether an existing route could be diverted.

It was noted that carriageway widths would not need to be stated within concept statements.

ECC advised that there are no issues with the A1245/London Road roundabout. ECC noted that the Hullbridge Road/Rawreth Lane roundabout could be improved using additional land. ECC highlighted potential issues around the railway station.

ECC advised that additional crossing facilities and well planned walking and cycling routes would be needed to discourage short car journeys.

West Hockley

Potential access onto Folly Lane and Church Road was discussed. The issues of frontage onto Church Road and visibility would need to be considered.

Potential access onto Chevening Gardens was discussed.

ECC noted that there are pros and cons to both.

South Hawkwell

Thorpe Road, in terms of proposals within the planning application, was discussed e.g. minimal upgrades. Junction improvements were also discussed.

South East Ashingdon

The local highway network was discussed. ECC highlighted the importance of travel plans, and the need to encourage walking and cycling.

ECC advised that for a development of 500 homes two access points would be needed to serve it.

South West Hullbridge

ECC advised that traffic should not be encouraged along Watery Lane.

Junction alterations were briefly discussed.

It was suggested that a new junction could be created along Lower Road, and access could be provided along Malyons Lane. Other routes would be pedestrian. There shouldn't be any roads westwards of the allocated site.

West Great Wakering

ECC highlighted that access to secondary schools would need to be considered. It was noted that bus access along the High Street is preferable.

No highway issues were identified.

There may be potential to link to the brickworks site with a site to the south of the High Street.

South Canewdon

No highway issues were identified.

Employment Site Allocations

Rayleigh

Potential access issues for Michelin Farm were identified – at the Fairglens interchange and the railway bridge to the north.

There is potential for a bigger employment site to the south of London Road.

Great Wakering

No highway issues were identified.

Gypsy and Traveller Site Allocations

East of A1245

No technical argument against the site, even with additional pitches. It was noted that there is a signalised junction to the north and access is onto a dual carriageway.

South of London Road

The pylons were noted as an issue.

Rochford District Transportation and Highway Meeting

Thursday 30th August 2012 – 10am
County Hall, Chelmsford

Agenda

1. LDF Update
2. Discussion of transport requirements / highway improvements for potential sites (residential & employment). Including potential costs:

North of London Road, Rayleigh

- links between residential and new employment along London Road
- potential options for a bus-only route
- links with Rawreth Industrial Estate

West Rochford

West Hockley

- Folly Lane and Church Road potential access

South Hawkwell

East Ashingdon

South West Hullbridge

South Canewdon

South East Ashingdon

West Great Wakering

- potential links to the High Street and Star Lane
- links between residential and new employment along Star lane
- links between brownfield and greenfield potential residential options

3. Hockley, Rayleigh and Rochford Area Action Plans
4. Transportation SPD
5. AOB

Notes

Attendees

Katherine Wilkinson (ECC)
Mark Lawrence (ECC)
Tony Buston (ECC)
Sam Hollingworth (RDC)
Natalie Hayward (RDC)

Rayleigh

- Access onto the site would be considered as part of a planning application (rather than through a CIL contribution)
- A roundabout or signalised junction would be required
- Improvements to the roundabout at the western end of London Road could be addressed through CIL but this would be subject to the CIL tests
- In general ECC will investigate the potential for 'stats data searches' for the locations. RDC will investigate potential funding
- A bus only route could be provided (using bus gates; cameras; tank traps etc). It is important to retain a dialogue with relevant bus companies (First or Arriva)
- Instead of two access points to the north and south, one access point to the north could be provided, and one to the south. The site could be linked into a smaller adjacent development which has access onto London Road and provide a circular link, one strategic access point and one smaller access point onto London Road. A bus only route could still be provided. A signalised junction would increase costs
- There is a lack of capacity at the Hullbridge Road/Rawreth Lane junction as the utilities present in the adjacent field to the north makes improvements challenging. Contributions could be pooled from neighbouring developments to fund this improvement
- In relation to employment land to the south of London Road, ECC requested that RDC calculate the approximate number of jobs likely to be generated from new employment sites

Michelins Farm

- ECC discussed the issues with developing compliant junctions and stated that it could be engineered but this would likely be costly and could impact on viability

Rochford

- Cycling links both along Ironwell Lane and Hall Road and through the site (connecting Hall Road to Ironwell Lane). This site should link to the Sustrans route.

- ECC advised that the Sutton Road/Anne Boleyn junctions have been looked at the planning application stage

Hockley

- Existing access on and off the site is acceptable provided it meets the required standards
- No new point of access should be provided if the site to the west is included; the existing link to the south onto Church Road should be utilised
- There is an existing public footpath to the south connecting to Hockley Road and there is a frequent bus service along here

Hawkwell

- There are no issues with residential development on Thorpe Road Industrial Estate
- Thorpe Road will only be improved in the application area to deter people going south
- Contributions towards cycling along Ironwell Lane (potential off road route) would be required and this site should link to the Sustrans route.
- Potential for on road alternative cycling route along Hall Road

Ashingdon

- The south east site should have at least two access points primarily onto Ashingdon Road, possibly three
- A modal shift should be emphasised – pedestrian and cycling links, improvements to public transport

Hullbridge

- Potentially one access point to the south and one to the east. Elsewhere pedestrian links to the east.
- Contributions towards public transport and cycling required. This site should link to the Sustrans route.

Canewdon

- Noted farm traffic uses the road leading to the church
- One access from site to the west wouldn't be an issue

Great Wakering

- Depending on numbers, the site to the north could have one access point

- Links to cycle network to be considered, potentially in conjunction with Southend
- Station travel planning and access to the nearest station would be required (applicable to all sites)

HAAP

- ECC comments on previous stages of the HAAP are still applicable

RayAAP/RocAAP

- Transport issues to be discussed later in the year.

Transport SPD

Rochford stated their intention to develop a Transport SPD. ECC agreed to support them in this.

Appendix 7(B) – Duty to Co-operate (Neighbouring Authorities)

From: Samuel Hollingworth
Sent: 05 November 2012 17:11
To: Basildon Planning Policy; Castle Point Planning; Chelmsford Planning Policy (planning.policy@chelmsford.gov.uk); Maldon Planning Policy; Southend Planning Policy (ldf@southend.gov.uk)
Cc: Local Plans (Planning Policy)
Subject: Rochford District Allocations DPD and Hockley Area Action Plan

Dear all,

As a neighbouring authority to Rochford District, I am writing to you regarding the Rochford District Allocations Development Plan Document.

Rochford District Council is currently progressing its Allocations DPD, and on 27 October 2012 the Local Development Framework Sub-Committee recommended a draft to Full Council for publication for pre-submission consultation.

The document identifies specific sites for development, following on from our adopted Core Strategy.

Full Council will consider the draft plan on 27 November 2012. If agreed by Council, the pre-submission document will be subject to a period of formal consultation. Naturally, as a neighbouring authority, we will be formally consulting you on the document. However, given that you may feel that proposals within the document give rise to cross-boundary issues, I wished to alert you to the draft of the document in advance of such consultation. The draft considered by the Local Development Framework Sub-Committee can be viewed [here](#). Further information on this Sub-Committee, including background documents presented to it, are available to view [here](#). Please note that changes to the policy text were recommended by Members of the Sub-Committee – the minutes of this meeting, including such changes, will be published on the aforementioned webpage shortly.

In addition, the pre-submission iteration of the Hockley Area Action Plan was considered at the same meeting, which may be of interest to you.

If you wish to discuss any elements of the draft Allocations or HAAP Pre-Submission documents, or arrange to meet to discuss them face-to-face, please do not hesitate to contact me – my details are listed below.

Yours faithfully,

Samuel Hollingworth
Planning Policy Team Leader
Rochford District Council
01702 318165
FeatureNet 785 3508
samuel.hollingworth@rochford.gov.uk
www.rochford.gov.uk

The above comments are those of an Officer of the Council and are without prejudice to further consideration of this matter or to the Council's final decision

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Rochford District Council – Local Development Framework Allocations Document: Consultation Statement

From: Amanda Raffaelli <ARaffaelli@castlepoint.gov.uk>
Sent: 19 November 2012 11:27
To: Samuel Hollingworth
Cc: Steve Rogers
Subject: Rochford District Draft Allocations and Designations Document

Dear Sam,

We have now had the opportunity to discuss the proposals set out in your draft allocations and designations document with our Cabinet Members, and they have indicated some concerns in relation to proposed allocations GT1 and NEL2. There are two key areas of concern in relation to these allocations:

- 1) **Impact on the strategic highways network.** The proposed allocations are located adjacent to the Fairglen Interchange. There are concerns that if the access arrangements for this site are not properly planned, the development of these allocations may impact on traffic flows at this junction. There is the potential that this may increase congestion and impact on the quality of life of residents living across south east Essex, including residents of Castle Point.
- 2) **Impact on the strategic purpose of the Green Belt.** The proposed allocations are located in the middle of the Green Belt separate from any of the existing urban areas in south east Essex. The Green Belt in this location performs an important role in separating the various towns in this area from one another. Furthermore, the Green Belt in this location also provides a landscape setting for the A130. Along its length from Chelmsford to Canvey Island the A130 is a road passing through the countryside rather than a bypass to the various towns it serves. There is a concern that the development of the proposed allocations will undermine this landscape, and set a precedent for similar developments elsewhere along the route of the A130.

Given the cross-boundary nature of these likely impacts, we are grateful that you have notified us early of your intended allocation sites. We would be pleased to discuss this matter with you further, and consider any evidence you may have with regard to the highways and Green Belt implications of these allocations. We would also be pleased to see any mitigation plans that you may have (or be developing) to limit the impacts of these proposals on the highway network and/or Green Belt.

Kind regards,

Amanda Raffaelli BSc MSc MA
Senior Planning Policy Officer

Castle Point Borough Council | telephone: 01268 882384 | featurenet: 782 2384 | email: araffaelli@castlepoint.gov.uk | website: www.castlepoint.gov.uk

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Rochford District Council – Local Development Framework Allocations Document: Consultation Statement

From: Samuel Hollingworth
Sent: 21 November 2012 11:31
To: roy.lewis@ESSEXCC.gov.uk
Cc: Local Plans (Planning Policy)
Subject: Rochford District Allocations DPD and Hockley Area Action Plan

Dear Roy,

I am writing to you regarding the Rochford District Allocations Development Plan Document.

Rochford District Council is currently progressing its Allocations DPD, and on 27 October 2012 the Local Development Framework Sub-Committee recommended a draft to Full Council for publication for pre-submission consultation.

The document identifies specific sites for development, following on from our adopted Core Strategy.

Full Council will consider the draft plan on 27 November 2012. If agreed by Council, the pre-submission document will be subject to a period of formal consultation. Naturally, Essex County Council we will be formally consulting you on the document. However, given that you may feel that proposals within the document give rise to cross-boundary / county-wide issues, I wished to alert you to the draft of the document in advance of such consultation. The draft considered by the Local Development Framework Sub-Committee can be viewed [here](#). Further information on this Sub-Committee, including background documents presented to it, are available to view [here](#). Please note that changes to the policy text were recommended by Members of the Sub-Committee – the minutes of this meeting are available on the aforementioned webpage.

In addition, the pre-submission iteration of the Hockley Area Action Plan was considered at the same meeting, which may be of interest to you.

If you wish to discuss any elements of the draft Allocations or HAAP Pre-Submission documents, or arrange to meet to discuss them face-to-face, please do not hesitate to contact me – my details are listed below.

Yours sincerely,

Samuel Hollingworth
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Rochford District Council – Local Development Framework Allocations Document: Consultation Statement

From: Samuel Hollingworth
Sent: 04 December 2012 18:19
To: 'Amanda Raffaelli'
Cc: Local Plans (Planning Policy)
Subject: RE: Rochford District Draft Allocations and Designations Document

Dear Amanda,

Please accept my apologies for the delay in getting back to you regarding your email below.

In response to your two points, the following may be of use:

1. We recognise the importance of ensuring any development would not have an undue impact on highway efficiency and safety in this location. Accordingly, the proposed Submission document includes the following policy text at paragraph 5.35:

However, given its location at a key junction, highways access/egress on and off the site would need to be carefully considered. In particular a 'Design Manual for Bridges and Roads' compliant junction, a full road safety audit and transport assessment would be required. Appropriate access and egress should be determined in consultation with Essex County Council, and implemented prior to any development.

We understand that agents of the landowner of the site are currently undertaking work on access / egress options.

2. The site in question is rather unique in its characteristics. It was described as "degraded countryside" in the Inspector's Report on the 2006 Rochford District Replacement Local Plan. Unlike any other site within this area of the Green Belt, it is enclosed and contained by the A1245, A127, A130 and railway line. There is an existing small business park to the south. The Rochford Core Strategy recognises the strategic importance of the Green Belt in the area in question in preventing urban sprawl and the coalescence of Rayleigh, Benfleet and Wickford. However, the development of this specific site -- given its particular characteristics -- is not considered to undermine this or create a precedent. For information, the following is a link to the detailed site assessment work undertaken on potential employment land:
http://www.rochford.gov.uk/pdf/planning_ldf_ebase_employment.pdf. The site in question is considered on pages 23-46.

It should also be noted that whilst the Rochford Core Strategy ensures the protection of the vast majority of the District's Green Belt, it does require that some (the minimum amount required for employment and housing needs) Green Belt land be reallocated for development. This includes the requirement that a site for employment development be allocated to the west of Rayleigh which should *inter alia* be capable of accommodating employment uses displaced by the redevelopment of Rawreth Industrial Estate, and have good links to the A130 and A1245 (Policy ED4). In addition, the Core Strategy requires that we allocate a site for Gypsies and Travellers in the west of the District (Policy H7).

I hope the above is of help in explaining our approach, but I am happy to discuss further if required.

Kind regards,

Sam

Rochford District Council – Local Development Framework Allocations Document: Consultation Statement

Samuel Hollingworth
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From: Amanda Raffaelli [mailto:ARaffaelli@castlepoint.gov.uk]
Sent: 19 November 2012 11:27
To: Samuel Hollingworth
Cc: Steve Rogers
Subject: Rochford District Draft Allocations and Designations Document

Dear Sam,

We have now had the opportunity to discuss the proposals set out in your draft allocations and designations document with our Cabinet Members, and they have indicated some concerns in relation to proposed allocations GT1 and NEL2. There are two key areas of concern in relation to these allocations:

- 1) **Impact on the strategic highways network.** The proposed allocations are located adjacent to the Fairglens Interchange. There are concerns that if the access arrangements for this site are not properly planned, the development of these allocations may impact on traffic flows at this junction. There is the potential that this may increase congestion and impact on the quality of life of residents living across south east Essex, including residents of Castle Point.
- 2) **Impact on the strategic purpose of the Green Belt.** The proposed allocations are located in the middle of the Green Belt separate from any of the existing urban areas in south east Essex. The Green Belt in this location performs an important role in separating the various towns in this area from one another. Furthermore, the Green Belt in this location also provides a landscape setting for the A130. Along its length from Chelmsford to Canvey Island the A130 is a road passing through the countryside rather than a bypass to the various towns it serves. There is a concern that the development of the proposed allocations will undermine this landscape, and set a precedent for similar developments elsewhere along the route of the A130.

Given the cross-boundary nature of these likely impacts, we are grateful that you have notified us early of your intended allocation sites. We would be pleased to discuss this matter with you

further, and consider any evidence you may have with regard to the highways and Green Belt implications of these allocations. We would also be pleased to see any mitigation plans that you may have (or be developing) to limit the impacts of these proposals on the highway network and/or Green Belt.

Kind regards,

Amanda Raffaelli BSc MSc MA
Senior Planning Policy Officer

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araffaelli@castlepoint.gov.uk | website: www.castlepoint.gov.uk

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Rochford District Council – Local Development Framework Allocations Document: Consultation Statement

From: Samuel Hollingworth
Sent: 14 March 2013 16:12
To: araffaelli@castlepoint.gov.uk; 'laura.percy@chelmsford.gov.uk'; Matthew.Winslow@basildon.gov.uk; Roy Lewis
Cc: Local Plans (Planning Policy)
Subject: Rochford Allocations Document - proposed changes to pre-submission draft and response to issues raised during consultation
Attachments: Specific&general consultation bodies (Pre-Submission).docx; Allocations Submission Document - Schedule of Minor Amendments (March 2013).docx

Dear Amanda, Laura, Matt and Roy,

Thank you for your recent representations on the Rochford Allocations Submission Document.

Having considered the comments received, Rochford District Council are proposing to make a number of amendments to the Submission Document.

Please find attached a copy of the proposed schedule of changes to the Allocations Submission Document. A summary of the consultation responses received from specific and general consultation bodies, together with RDC Officers' initial response to issues raised, is also attached for your information.

We would be happy to discuss these further: any comments you may have to make in writing would be gratefully received; in addition, if you and / or your Members wish to discuss in person we would be happy to arrange a meeting.

Kind regards,

Sam

Samuel Hollingworth
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samuel.hollingworth@rochford.gov.uk
www.rochford.gov.uk

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Appendix 7 (C) – Meeting with Basildon Borough Council

Meeting between Rochford District Council and Basildon Borough Council
2pm, 4 April 2013, Rochford Council Offices

Attendees:

Matthew Winslow (Forward Plans Manager, Basildon Borough Council)
Carl Glossop (Planning Officer, Basildon Borough Council)
Sam Hollingworth (Rochford District Council)
Natalie Hayward (Rochford District Council)

Notes:

RDC officers were advised that Basildon Borough Council consider any proposed land uses on or near to its shared administrative boundaries very carefully when participating in the strategic planning process with neighbouring authorities. Concerns had been raised in the Submission Consultation based on the suitability of Rochford's Gypsy and Traveller site (Policy GT1) in particular for residential use, given neighbouring uses in the Basildon Borough. It was also raised whether the impact of the proposed development had been fully assessed for mitigation, as residents of the new site may use facilities within Basildon Borough, as opposed to Rochford District.

BBC officers noted the Council did not comment on the 2010 Discussion and Consultation Document, and there had not been an additional iteration of the Allocations Document between then and the 2012 Submission Document. BBC officers advised that if they had been aware of the preferred site for Gypsy and Travellers, through, for example, an additional consultation iteration of the Plan, they would have identified these issues earlier.

BBC officers advised that land directly to the south of the proposed employment (Policy NEL2) and Gypsy and Traveller site (Policy GT1), which is within Basildon Borough, has an existing authorised waste management use, and the Council does not consider that the proposed site across the boundary is an appropriate location for residential use given this.

RDC officers were advised that BBC officers are currently undertaking an Employment Land Review and that land directly to the south and west of land identified in Policy NEL2 and GT1 is being evaluated for its potential to be considered to meet employment needs in the future. BBC officers advised that the land within Basildon Borough should not be landlocked by surrounding development in Rochford, and that access to this land would have to come through Policy NEL2 if it was to be realised. This could bring an opportunity to the Rochford side of the location, effectively making the site larger and not determined in its extent by the historic administrative boundary.

BBC officers suggested an alternative site option as per their representations to the pre-submission consultation, that the western part of Policy NEL1 (previously developed land) greater than 60m from the pylons could accommodate a Gypsy and Traveller site, with the rest accommodating employment uses. RDC officers questioned the deliverability of the previously developed land, as it was on privately-owned land accommodating existing commercial uses that had not been put forward for development as a site for Gypsies and Travellers. RDC Officers advised that RDC Members were keen to retain the existing businesses within the employment land allocation, although owners may wish to redevelop the existing commercial uses for other employment uses in the future. Given existing uses, potential redevelopment of the existing commercial uses was unlikely to occur in the short-term; and it was noted that

Gypsy and Traveller pitches to be provided at Policy GT1 were required to be delivered in the more immediate future to meet Rochford District's 5 year land supply.

RDC officers stated that a range of options for a Gypsy and Traveller sites had been considered within the Discussion and Consultation Document, including allocating a number of smaller sites. The majority of the sites considered had been put forward by landowners through the Call for Sites, although it was confirmed that Rochford District had not considered land that was not put forward specifically for Gypsy and Traveller uses where there were concerns over deliverability from willing landowners. Sites to the west of the District are preferable as this is in accordance with the Core Strategy, and the integration of a Gypsy and Traveller site with other allocations for residential uses was unlikely to be deliverable given feedback from developers. RDC officers advised that the site identified in Policy GT1 is considered to be suitable and deliverable for the development proposed and a view would be sought from Rochford's Environmental Health Officers to confirm this.

BBC officers raised the matter of the policy wording reference to accessing land to the west of Policy NEL2 within the Allocations Submission Document (which is in Basildon Borough) as this is a cross-boundary issue. However, RDC officers confirmed that this is proposed to be removed in the version submitted to the government for examination.

Appendix 8 – Proposed Schedule of Changes to the Allocations Submission Document

The changes below are expressed either in the conventional form of strikethrough for deletions and underlining for additions of text, or by specifying the change in words in *italics*.

The below proposed minor amendments relate to changes to the Allocations Submission Document (November 2012).

The page numbers and paragraph numbering below refer to the Allocations Submission Document (November 2012), and do not take account of the deletion or addition of text.

The colour-coding below highlights where proposed minor amendments are repeated throughout the Allocations Submission Document (November 2012).

Page	Policy/ Paragraph	Minor Amendment	Justification
6	Table 1	<p>Insert new paragraph explaining the role of the Minerals and Waste Local Plans below Table 1:</p> <p><u>The Minerals and Waste Local Plans produced by Essex County Council also form part of the Development Plan for Rochford District. The Waste Local Plan provides the strategy and policies for waste planning in Essex and Southend until at least 2031, and identifies sites for development. The Minerals Local Plan provides the strategy and policies for minerals planning in Essex until 2029 and includes allocations of sites for development. The Local Planning Authority must have regard to the policies in these documents in the determination of the future development of the District.</u></p>	Issue raised by Essex County Council during pre-submission consultation (comment 6).
10	1.29	<p>Insert the following text below 2nd bullet point:</p> <ul style="list-style-type: none">• <u>Essex Flood Risk Management Strategy</u> looks at ways to	Issue raised by Essex County Council during pre-submission consultation (comment 4).

Rochford District Council – Local Development Framework Allocations Document: Consultation Statement

Page	Policy/ Paragraph	Minor Amendment	Justification
		<u>tackle local flood risk in a co-ordinated way. It will identify some strategic actions needing to occur over the next two years and the underlying principles upon which to base future decisions.</u>	
10	1.29	<p>Insert the following text below 11th bullet point:</p> <ul style="list-style-type: none"> • <u>Preliminary Flood Risk Assessment</u> is a high level, <u>county-wide analysis which considers past flooding and possible future flooding from the Essex Flood Risk Management Strategy and Surface Water Management Plans.</u> 	Issue raised by Essex County Council during pre-submission consultation (comment 4).
11	1.29	<p>Amend the 5th bullet point and move above the 'Strategic Environmental Assessment Baseline Information Profile' bullet point:</p> <ul style="list-style-type: none"> • <u>South Essex Surface Water Management Plan 2011-2012</u> sets out a co-ordinated approach to the management of surface water within South Essex (encompassing Basildon Borough, Castle Point Borough and Rochford District). 	Issue raised by Essex County Council during pre-submission consultation (comment 5).
17	2.16	<p>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. This should take the form of natural/semi-natural greenspace. 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</u></p>	Issues raised by Essex County Council during pre-submission consultation (comments 18 and 21).

Rochford District Council – Local Development Framework Allocations Document: Consultation Statement

Page	Policy/ Paragraph	Minor Amendment	Justification
		<u>landscape strategy promoting green links and biodiversity corridors should be prepared for the site.</u>	
19	2.34	A Transport Impact Assessment, including an assessment of air quality, must accompany any planning application to develop the site. This must examine the additional transport impacts that the development of this site will generate. Actions to address impacts identified through the Transport Impact Assessment must accompany the development of the site, or be provided prior to the commencement of development.	Issue raised by Essex County Council during pre-submission consultation (comment 28).
19	2.35	The possible dislocation between the development of the northern and southern sections of the site has the potential to impact on the range of Sustainable Drainage Systems (SUDS) developed. Attenuation <u>and source control</u> SUDS of a size proportionate to the development should be used such as balancing ponds, swales, detention basins and green roofs. <u>Consideration would need to be given to the potential impact of certain types of SUDS on below ground archaeology.</u> Appropriate SUDS should be determined in consultation with Essex County Council <u>and the Environment Agency. A site specific flood risk assessment incorporating a surface water drainage strategy should be prepared for the site.</u> A drainage strategy should be prepared for the site.	Issues raised by English Heritage (comment 17) and Essex County Council (comments 19 and 20) during pre-submission consultation.
19	2.36	The capacity constraints in relation to Southend Waste Water Treatment Works are noted (both transfer and transmission). This will have to be overcome at the design stage in conjunction with Anglian Water. The Works discharge to the Thames	Issue raised by Environment Agency during pre-submission consultation (comments 15 and 24).

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		<u>Tideway which falls under the Bathing Waters Directive and Shellfish Waters Directive. Therefore, before planning permission is granted, the applicant will need to demonstrate that there is adequate capacity in the Works and that the development will not prevent the objectives of the Bathing Waters Directive and Shellfish Waters Directive from being met. Early engagement with Anglian Water and the Environment Agency will therefore be necessary.</u>	
19	2.39	Insert new paragraph below paragraph 2.39: <u>The site may have potential to be of archaeological interest and this should be taken into consideration. No development shall commence within the area shown hatched on the approved drawing, before the applicant has secured the implementation of a programme of archaeological work, in accordance with a written scheme of investigation, which shall previously have been submitted to and approved in writing by the Local Planning Authority. The developer shall afford access to the site at all reasonable times to an archaeologist nominated by Essex County Council and shall allow their observations of the excavations and records to be made of any items of interest. In this respect, not less than 48 hours notice shall be given in writing to the Local Planning Authority of the commencement of works requisite for the implementation of the permitted development.</u>	Issue raised by English Heritage (comments 10 and 11) and Essex County Council (comment 29) during pre-submission consultation.
22	2.55	Stambridge Mills is located within flood zone 2 and 3, and consequently both the Sequential Test and the Exceptions Test , as required by the NPPF, would have to be passed before	Issue raised by the Environment Agency during pre-submission consultation (comment 33).

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		development can take place.	
24	2.66	A minimum of 0.3 hectares of publicly accessible natural/semi-natural greenspace and amenity greenspace should be provided on-site. <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>	Issues raised by Essex County Council during pre-submission consultation (comments 18 and 21).
24	2.70	A Transport Impact Assessment, including an assessment of air quality, must accompany any planning application to develop the site. This must examine the additional transport impacts that the development of this site will generate. Actions to address impacts identified through the Transport Impact Assessment must accompany the development of the site, or be provided prior to the commencement of development.	Issue raised by Essex County Council during pre-submission consultation (comment 28).
24	2.71	<u>Attenuation and source control</u> Sustainable Drainage Systems (SUDS) of a size proportionate to the development should be used such as balancing ponds, swales, detention basins and green roofs. This could be incorporated into the greenspace provided on-site. <u>Consideration would need to be given to the potential impact of certain types of SUDS on below ground archaeology.</u> Appropriate SUDS should be determined in consultation with Essex County Council <u>and the Environment Agency.</u> A site specific flood risk assessment incorporating a surface water drainage strategy should be prepared for the site. A drainage strategy should be prepared for the sites.	Issues raised by English Heritage (comment 17) and Essex County Council (comments 19 and 20) during pre-submission consultation.

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25	2.77	<p>Insert new paragraph below paragraph 2.77:</p> <p><u>The site may have potential to be of archaeological interest and this should be taken into consideration. No development shall commence within the area shown hatched on the approved drawing, before the applicant has secured the implementation of a programme of archaeological work, in accordance with a written scheme of investigation, which shall previously have been submitted to and approved in writing by the Local Planning Authority. The developer shall afford access to the site at all reasonable times to an archaeologist nominated by Essex County Council and shall allow their observations of the excavations and records to be made of any items of interest. In this respect, not less than 48 hours notice shall be given in writing to the Local Planning Authority of the commencement of works requisite for the implementation of the permitted development.</u></p>	Issue raised by English Heritage during pre-submission consultation (comments 10 and 11).
28	2.102	<p>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. 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). <u>Conditions will be attached to ensure that any greenspace provided has ecological value.</u></p>	Issue raised by Essex County Council during pre-submission consultation (comment 18).
28	2.103	<p>Additionally, at least 0.01 hectares of amenity greenspace should be provided on-site. <u>A landscape strategy promoting green links and biodiversity corridors should be prepared for the</u></p>	Issue raised by Essex County Council during pre-submission consultation (comment 21).

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		<u>site.</u>	
29	2.108	A Transport Impact Assessment, including an assessment of air quality, must accompany any planning application to develop the site. This must examine the additional transport impacts that the development of this site will generate. Actions to address impacts identified through the Transport Impact Assessment must accompany the development of the site, or be provided prior to the commencement of development.	Issue raised by Essex County Council during pre-submission consultation (comment 28).
29	2.109	Attenuation <u>and source control</u> Sustainable Drainage Systems (SUDS) of a size proportionate to the development should be used such as balancing ponds, swales, detention basins and green roofs. <u>Consideration would need to be given to the potential impact of certain types of SUDS on below ground archaeology.</u> Appropriate SUDS should be determined in consultation with Essex County Council <u>and the Environment Agency.</u> A site specific flood risk assessment incorporating a <u>surface water drainage strategy should be prepared for the site.</u> A drainage strategy should be prepared for the sites.	Issues raised by English Heritage (comment 17) and Essex County Council (comments 19 and 20) during pre-submission consultation.
29	2.112	Insert new paragraphs below paragraph 2.112: <u>There are a number of surviving brick-built World War II accommodation huts at the southern end of the industrial estate. Where possible these buildings should be retained within any development. However if this proves impossible to achieve an historic building survey to record the complex should be undertaken prior to any demolition.</u>	Issue raised by Essex County Council during pre-submission consultation (comment 40). Issue raised by English Heritage during pre-submission consultation (comments 10 and 11).

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		<u>The site may have potential to be of archaeological interest and this should be taken into consideration. No development shall commence within the area shown hatched on the approved drawing, before the applicant has secured the implementation of a programme of archaeological work, in accordance with a written scheme of investigation, which shall previously have been submitted to and approved in writing by the Local Planning Authority. The developer shall afford access to the site at all reasonable times to an archaeologist nominated by Essex County Council and shall allow their observations of the excavations and records to be made of any items of interest. In this respect, not less than 48 hours notice shall be given in writing to the Local Planning Authority of the commencement of works requisite for the implementation of the permitted development.</u>	
36	3.31	A Transport Impact Assessment, including an assessment of air quality (particularly assessing the potential impact on Rayleigh town centre), must accompany any planning application to develop the site. This must examine the additional transport impacts that the development of this site will generate. Actions to address impacts identified through the Transport Impact Assessment must accompany the development of the site, or be provided prior to the commencement of development.	Issue raised by Essex County Council during pre-submission consultation (comment 28).
36	3.36	Insert new paragraph below paragraph 3.36: <u>Conditions will be attached to ensure that any greenspace</u>	Issues raised by Essex County Council during pre-submission consultation (comments 46 and

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Page	Policy/ Paragraph	Minor Amendment	Justification
		<u>provided on or off site has ecological value. In addition, a landscape strategy promoting green links and biodiversity corridors should be prepared for the site.</u>	47).
36/37	3.37	<p>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. <u>The replacement facilities provided 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. 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. It is calculated that the <u>The new club house 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.</u> Additionally this facility should be well connected to the pedestrian and cycling network. <u>The siting and design of the relocated facility should be determined in consultation with Sport England.</u></p>	Issues raised by Sport England (comments 64, 65 and 66) during pre-submission consultation.

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37	3.40	Attenuation <u>and source control</u> Sustainable Drainage Systems (SUDS) of a size proportionate to the development should be used such as balancing ponds, swales, detention basins and green roofs. These could be incorporated into the greenspace provided on- and/or adjacent to the site. <u>Consideration would need to be given to the potential impact of certain types of SUDS on below ground archaeology.</u> Appropriate SUDS should be determined in consultation with Essex County Council <u>and the Environment Agency.</u> A site specific flood risk assessment <u>incorporating a surface water drainage strategy should be prepared for the site.</u> A drainage strategy should be prepared for the site.	Issues raised by English Heritage (comment 42) and Essex County Council (comments 44 and 45) during pre-submission consultation.
38	3.43	Insert new paragraph below paragraph 3.43: <u>The site may have potential to be of archaeological interest and this should be taken into consideration. No development shall commence within the area shown hatched on the approved drawing, before the applicant has secured the implementation of a programme of archaeological work, in accordance with a written scheme of investigation, which shall previously have been submitted to and approved in writing by the Local Planning Authority. The developer shall afford access to the site at all reasonable times to an archaeologist nominated by Essex County Council and shall allow their observations of the excavations and records to be made of any items of interest. In this respect, not less than 48 hours notice shall be given in writing to the Local Planning Authority of the commencement of works requisite for the implementation of the permitted</u>	Issue raised by English Heritage during pre-submission consultation (comments 10 and 11).

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		<u>development.</u>	
42	3.67	Insert new paragraph below paragraph 3.67: <u>Conditions will be attached to ensure that any greenspace provided on or off site has ecological value. In addition, a landscape strategy promoting green links and biodiversity corridors should be prepared for the site.</u>	Issue raised by Essex County Council during pre-submission consultation (comment 46 and 47).
42	3.70	<u>Attenuation and source control</u> Sustainable Drainage Systems (SUDS) of a size proportionate to the development should be used such as balancing ponds, swales, detention basins and green roofs. These could be incorporated into the greenspace provided on- and/or adjacent to the site. <u>Consideration would need to be given to the potential impact of certain types of SUDS on below ground archaeology.</u> Appropriate SUDS should be determined in consultation with Essex County Council <u>and the Environment Agency. A site specific flood risk assessment incorporating a surface water drainage strategy should be prepared for the site.</u> A drainage strategy should be prepared for the site.	Issues raised by English Heritage (comment 42) and Essex County Council (comments 44 and 45) during pre-submission consultation.
43	3.75	A Transport Impact Assessment, including an assessment of air quality, must accompany any planning application to develop the site. This must examine the additional transport impacts that the development of this site will generate. Actions to address impacts identified through the Transport Impact Assessment must accompany the development of the site, or be provided prior to the commencement of development.	Issue raised by Essex County Council during pre-submission consultation (comment 28).

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43	3.77	<p>Insert new paragraph below paragraph 3.77:</p> <p><u>The site may have potential to be of archaeological interest and this should be taken into consideration. No development shall commence within the area shown hatched on the approved drawing, before the applicant has secured the implementation of a programme of archaeological work, in accordance with a written scheme of investigation, which shall previously have been submitted to and approved in writing by the Local Planning Authority. The developer shall afford access to the site at all reasonable times to an archaeologist nominated by Essex County Council and shall allow their observations of the excavations and records to be made of any items of interest. In this respect, not less than 48 hours notice shall be given in writing to the Local Planning Authority of the commencement of works requisite for the implementation of the permitted development.</u></p>	Issue raised by English Heritage during pre-submission consultation (comments 10 and 11).
43	3.77	<p>Insert new paragraph below paragraph 3.77:</p> <p><u>The site is within a Minerals Safeguarding Area and therefore consultation on the proposed development of the site with Essex County Council is required.</u></p>	Issue raised by Essex County Council during pre-submission consultation (comment 74).
46	3.87	<p>A minimum of 0.4 hectares of amenity greenspace should be integrated into the development, and should be publicly accessible. <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> The provision of other forms of open space</p>	Issue raised by Essex County Council during pre-submission consultation (comment 46 and 47).

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		such as allotments (a minimum of 0.02 hectares) and outdoor sports facilities (at least 0.2 hectares) could take the form of financial contributions and provided offsite, if it is demonstrated at the planning application stage to be undeliverable on-site.	
47	3.94	Attenuation <u>and source control</u> Sustainable Drainage Systems (SUDS) of a size proportionate to the development should be used such as balancing ponds, swales, detention basins and green roofs. These could be incorporated into the greenspace provided on-site. <u>Consideration would need to be given to the potential impact of certain types of SUDS on below ground archaeology.</u> Appropriate SUDS should be determined in consultation with Essex County Council <u>and the Environment Agency.</u> A site specific flood risk assessment incorporating a <u>surface water drainage strategy should be prepared for the site.</u> A drainage strategy should be prepared for the site.	Issues raised by English Heritage (comment 42) and Essex County Council (comments 44 and 45) during pre-submission consultation.
47	3.94	Insert new paragraph below paragraph 3.94: <u>The site may have potential to be of archaeological interest and this should be taken into consideration. No development shall commence within the area shown hatched on the approved drawing, before the applicant has secured the implementation of a programme of archaeological work, in accordance with a written scheme of investigation, which shall previously have been submitted to and approved in writing by the Local Planning Authority. The developer shall afford access to the site at all reasonable times to an archaeologist nominated by Essex County Council and shall allow their observations of the excavations and records to be made of any items of interest. In</u>	Issue raised by English Heritage during pre-submission consultation (comments 10 and 11).

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		<u>this respect, not less than 48 hours notice shall be given in writing to the Local Planning Authority of the commencement of works requisite for the implementation of the permitted development.</u>	
47	3.97	A Transport Impact Assessment, including an assessment of air quality, must accompany any planning application to develop the site. This must examine the additional transport impacts that the development of this site will generate. Actions to address impacts identified through the Transport Impact Assessment must accompany the development of the site, or be provided prior to the commencement of development.	Issue raised by Essex County Council during pre-submission consultation (comment 28).
50	3.116	Whilst being sensitive to the character and setting of the surrounding area, the development should not be of an overly uniform design but should be of high quality. The principles of the Essex Design Guide should be taken into account. Amenity greenspace/appropriate landscaping should be provided on-site. <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>	Issue raised by Essex County Council during pre-submission consultation (comment 46 and 47).
51	3.122	A Transport Impact Assessment, including an assessment of air quality, must accompany any planning application to develop the site. This must examine the additional transport impacts that the development of this site will generate. Actions to address impacts identified through the Transport Impact Assessment must accompany the development of the site, or be provided	Issue raised by Essex County Council during pre-submission consultation (comment 28).

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Page	Policy/ Paragraph	Minor Amendment	Justification
		prior to the commencement of development.	
51	3.128	<p>Insert new paragraph below paragraph 3.128:</p> <p><u>The site may have potential to be of archaeological interest and this should be taken into consideration. No development shall commence within the area shown hatched on the approved drawing, before the applicant has secured the implementation of a programme of archaeological work, in accordance with a written scheme of investigation, which shall previously have been submitted to and approved in writing by the Local Planning Authority. The developer shall afford access to the site at all reasonable times to an archaeologist nominated by Essex County Council and shall allow their observations of the excavations and records to be made of any items of interest. In this respect, not less than 48 hours notice shall be given in writing to the Local Planning Authority of the commencement of works requisite for the implementation of the permitted development.</u></p>	Issue raised by English Heritage during pre-submission consultation (comments 10 and 11).
52	3.129	<p><u>Attenuation and source control</u> Sustainable Drainage Systems (SUDS) of a size proportionate to the development should be used such as balancing ponds, swales, detention basins and green roofs. These could be incorporated into the greenspace provided on-site. <u>Consideration would need to be given to the potential impact of certain types of SUDS on below ground archaeology.</u> Appropriate SUDS should be determined in consultation with Essex County Council <u>and the Environment Agency.</u> A site specific flood risk assessment incorporating a <u>surface water drainage strategy</u> should be prepared for the site.</p>	Issues raised by English Heritage (comment 42) and Essex County Council (comments 44 and 45) during pre-submission consultation.

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		A drainage strategy should be prepared for the site.	
54	3.143	A Transport Impact Assessment, including an assessment of air quality, must accompany any planning application to develop the site. This must examine the additional transport impacts that the development of this site will generate. Actions to address impacts identified through the Transport Impact Assessment must accompany the development of the site, or be provided prior to the commencement of development.	Issue raised by Essex County Council during pre-submission consultation (comment 28).
54	3.144	<p>At least 0.7 hectares of natural/semi-natural greenspace which is publicly accessible should be provided on-site and integrated into the development. <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></p> <p>At least a local area for play (LAP) on a minimum of 0.02 hectares should be provided on the site, but developers should 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. 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</p>	Issue raised by Essex County Council during pre-submission consultation (comment 46 and 47).

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Page	Policy/ Paragraph	Minor Amendment	Justification
		Play England.	
55	3.150	<p>Insert new paragraph below paragraph 3.150:</p> <p><u>The site may have potential to be of archaeological interest and this should be taken into consideration. No development shall commence within the area shown hatched on the approved drawing, before the applicant has secured the implementation of a programme of archaeological work, in accordance with a written scheme of investigation, which shall previously have been submitted to and approved in writing by the Local Planning Authority. The developer shall afford access to the site at all reasonable times to an archaeologist nominated by Essex County Council and shall allow their observations of the excavations and records to be made of any items of interest. In this respect, not less than 48 hours notice shall be given in writing to the Local Planning Authority of the commencement of works requisite for the implementation of the permitted development.</u></p>	Issue raised by English Heritage during pre-submission consultation (comments 10 and 11).
55	3.150	<p>Insert new paragraph below paragraph 3.150:</p> <p><u>The site is within a Minerals Safeguarding Area and therefore consultation on the proposed development of the site with Essex County Council is required.</u></p>	Issue raised by Essex County Council during pre-submission consultation (comments 86 and 87).
55	3.151	<p><u>Attenuation and source control</u> Sustainable Drainage Systems (SUDS) of a size proportionate to the development should be used such as balancing ponds, swales, detention basins and green roofs. These could be incorporated into the greenspace</p>	Issues raised by English Heritage (comment 42) and Essex County Council (comments 44 and 45) during pre-submission consultation.

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		provided on-site. <u>Consideration would need to be given to the potential impact of certain types of SUDS on below ground archaeology.</u> Appropriate SUDS should be determined in consultation with Essex County Council <u>and the Environment Agency.</u> A site specific flood risk assessment incorporating a <u>surface water drainage strategy should be prepared for the site.</u> A drainage strategy should be prepared for the site.	
58	3.167	A minimum of 3.6 hectares of the site should accommodate publicly accessible natural/semi-natural greenspace. This should be well-integrated into the development, and accessible for residents of both phases of development. <u>Conditions will be attached to ensure that any greenspace provided has ecological value.</u> A landscape strategy promoting green links and <u>biodiversity corridors should be prepared for the site.</u>	Issue raised by Essex County Council during pre-submission consultation (comment 46 and 47).
59	3.177	A Transport Impact Assessment, including an assessment of air quality, must accompany any planning application to develop the site. This must examine the additional transport impacts that the development of this site will generate. Actions to address impacts identified through the Transport Impact Assessment must accompany the development of the site, or be provided prior to the commencement of development. In particular, the development of this site should contribute towards improvements to the highway network to facilitate movement along the western part of the network.	Issue raised by Essex County Council during pre-submission consultation (comment 28).
60	3.182	Insert new paragraph below paragraph 3.182: <u>The site may have potential to be of archaeological interest and</u>	Issue raised by English Heritage during pre-submission consultation (comments 10 and 11).

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		<u>this should be taken into consideration. No development shall commence within the area shown hatched on the approved drawing, before the applicant has secured the implementation of a programme of archaeological work, in accordance with a written scheme of investigation, which shall previously have been submitted to and approved in writing by the Local Planning Authority. The developer shall afford access to the site at all reasonable times to an archaeologist nominated by Essex County Council and shall allow their observations of the excavations and records to be made of any items of interest. In this respect, not less than 48 hours notice shall be given in writing to the Local Planning Authority of the commencement of works requisite for the implementation of the permitted development.</u>	
60	3.183	Localised surface water flooding along Watery Lane to the south west of the site is an existing issue which development in this location should account for through the provision of Sustainable Drainage Systems (SUDS). Attenuation and source control SUDS of a size proportionate to the development should be used such as balancing ponds, swales, detention basins and green roofs. These could be incorporated into the greenspace provided on-site. <u>Consideration would need to be given to the potential impact of certain types of SUDS on below ground archaeology.</u> Appropriate SUDS should be determined in consultation with Essex County Council <u>and the Environment Agency. A site specific flood risk assessment incorporating a surface water drainage strategy should be prepared for the site.</u> A drainage strategy should be prepared for the site.	Issues raised by English Heritage (comment 42) and Essex County Council (comments 44 and 45) during pre-submission consultation.

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63	3.200	The topography in this location would need to be sensitively and carefully considered in the design and landscaping of the development due to the visual impact resulting from the increase in the height of the land northwards from Anchor Lane and Lark Hill Road. An area of open space (a minimum of 0.4 hectares of natural/semi-natural greenspace) should be provided to the north of the site, west of the lane. This green buffer will not form part of the development area, but will be situated in the Green Belt to the north/north west of the residential settlement. It should take the form of parkland which is publicly accessible and integrated into the development. <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>	Issue raised by Essex County Council during pre-submission consultation (comment 46 and 47).
64	3.207	The development should also be appropriately designed and landscaped taking into consideration the Canewdon Church Conservation Area to the north/north east 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/north east of the site, and the grade II listed 'White House Farmhouse, Lark Hill Road, Canewdon' 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. <u>In particular, proposals should take into consideration English Heritage's guidance 'The Setting of Heritage Assets'.</u>	Issue raised by English Heritage during pre-submission consultation (comment 102).

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64	3.207	<p>Insert new paragraph below paragraph 3.207:</p> <p><u>The site may have potential to be of archaeological interest and this should be taken into consideration. No development shall commence within the area shown hatched on the approved drawing, before the applicant has secured the implementation of a programme of archaeological work, in accordance with a written scheme of investigation, which shall previously have been submitted to and approved in writing by the Local Planning Authority. The developer shall afford access to the site at all reasonable times to an archaeologist nominated by Essex County Council and shall allow their observations of the excavations and records to be made of any items of interest. In this respect, not less than 48 hours notice shall be given in writing to the Local Planning Authority of the commencement of works requisite for the implementation of the permitted development.</u></p>	Issue raised by English Heritage during pre-submission consultation (comments 10 and 11).
64	3.212	<p>A Transport Impact Assessment, including an assessment of air quality, must accompany any planning application to develop the site. This must examine the additional transport impacts that the development of this site will generate. Actions to address impacts identified through the Transport Impact Assessment must accompany the development of the site, or be provided prior to the commencement of development.</p>	Issue raised by Essex County Council during pre-submission consultation (comment 28).
64	3.213	<p>Attenuation <u>and source control</u> Sustainable Drainage Systems (SUDS) of a size proportionate to the development should be used such as balancing ponds, swales, detention basins and</p>	Issues raised by English Heritage (comment 42) and Essex County Council (comments 44 and 45) during pre-submission consultation.

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		green roofs. These could be incorporated into the greenspace provided on- and/or adjacent to the site. <u>Consideration would need to be given to the potential impact of certain types of SUDS on below ground archaeology.</u> Appropriate SUDS should be determined in consultation with Essex County Council <u>and the Environment Agency.</u> A site specific flood risk assessment incorporating a surface water drainage strategy should be <u>prepared for the site.</u> A drainage strategy should be prepared for the site.	
67	3.230	At least 3.6 hectares of natural/semi-natural greenspace which is publicly accessible should be provided and integrated into the development. A green buffer to the east should be provided following the existing tree line further to the east to soften the boundary of the site. Within this area, a greenway linking Oxford Road in the north to The Drive in the south should be developed, enhancing access/egress to King Edmund School in the north and the facilities and services in Rochford town centre in the south. This buffer will not form part of the development area, but will be situated in the Green Belt to the east of the residential settlement. The green buffer should take the form of parkland which is publicly accessible and integrated into the development. <u>Conditions will be attached to ensure that any greenspace provided on or off site has ecological value. A landscape strategy promoting green links and biodiversity corridors should be prepared for the site.</u>	Issue raised by Essex County Council during pre-submission consultation (comment 46 and 47).

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Page	Policy/ Paragraph	Minor Amendment	Justification
68	3.238	Links to the neighbouring Local Wildlife Site to the east/south east of the site should be explored. Given the proximity of the site to this area of ecological value, a management plan for the Local Wildlife Site should be prepared <u>during the design and construction phases</u> in consultation with relevant bodies such as the Council, Natural England and the Essex Wildlife Trust, given potential increased recreational pressure on the site. <u>Disturbance of this site should be avoided.</u>	Issue raised by Essex County Council during pre-submission consultation (comment 112).
69	3.242	Pedestrian and cycle routes should be provided throughout the site, ensuring connectivity between the different elements of development, particularly between residential and the community uses. Pedestrian <u>and cycle</u> routes to the south of the site should also be provided, particularly if vehicular routes are not considered to be acceptable in this location.	Issue raised by Essex County Council during pre-submission consultation (comment 115).
69	3.244	A Transport Impact Assessment, including an assessment of air quality, must accompany any planning application to develop the site. This must examine the additional transport impacts that the development of this site will generate. Actions to address impacts identified through the Transport Impact Assessment must accompany the development of the site, or be provided prior to the commencement of development.	Issue raised by Essex County Council during pre-submission consultation (comment 28).
69	3.244	Insert new paragraph below paragraph 3.244: <u>The site may have potential to be of archaeological interest and this should be taken into consideration. No development shall commence within the area shown hatched on the approved</u>	Issue raised by English Heritage during pre-submission consultation (comments 10 and 11).

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		<u>drawing, before the applicant has secured the implementation of a programme of archaeological work, in accordance with a written scheme of investigation, which shall previously have been submitted to and approved in writing by the Local Planning Authority. The developer shall afford access to the site at all reasonable times to an archaeologist nominated by Essex County Council and shall allow their observations of the excavations and records to be made of any items of interest. In this respect, not less than 48 hours notice shall be given in writing to the Local Planning Authority of the commencement of works requisite for the implementation of the permitted development.</u>	
69	3.245	Attenuation <u>and source control</u> Sustainable Drainage Systems (SUDS) of a size proportionate to the development should be used such as balancing ponds, swales, detention basins and green roofs. These could be incorporated into the greenspace provided on-site. <u>Consideration would need to be given to the potential impact of certain types of SUDS on below ground archaeology.</u> Appropriate SUDS should be determined in consultation with Essex County Council <u>and the Environment Agency. A site specific flood risk assessment incorporating a surface water drainage strategy should be prepared for the site.</u> A drainage strategy should be prepared for the site.	Issues raised by English Heritage (comment 42) and Essex County Council (comments 44 and 45) during pre-submission consultation.
69	3.245	Insert new paragraph below paragraph 3.245: <u>The site is within a Minerals Safeguarding Area and therefore consultation on the proposed development of the site with Essex</u>	Issue raised by Essex County Council during pre-submission consultation (comment 111).

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Page	Policy/ Paragraph	Minor Amendment	Justification
		<u>County Council is required.</u>	
72	3.262	This open space should be primarily located between the site to the west of Little Waking Road (Policy SER9a) and the temporary road to the west to act as a green buffer. It would have benefits in landscape terms through reducing the visual impact of development from the surrounding highway network. 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>Conditions will be attached to ensure that any greenspace provided on or off site has ecological value. A landscape strategy promoting green links and biodiversity corridors should be prepared for the site.</u>	Issue raised by Essex County Council during pre-submission consultation (comment 46 and 47).
72	3.263	The site to the south of the High Street (Policy SER9b) is adjacent to a Local Wildlife Site which is located to the south. A green buffer between the development and the Local Wildlife Site should be provided to minimise disturbance. Given the proximity of the site and an area of ecological value, a management plan for the Local Wildlife Site should be prepared <u>during the design and construction phases</u> in consultation with relevant bodies such as the Council, Natural England and the Essex Wildlife Trust, given potential increased recreational pressure on the site. <u>Disturbance of this site should be avoided.</u>	Issue raised by Essex County Council during pre-submission consultation (comment 123).
74	3.277	Pedestrian <u>and cycle</u> links to the north of the land within Policy SER9b should be provided to enhance connectivity to the High Street.	Issue raised by Essex County Council during pre-submission consultation (comment 125).

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74	3.280	A Transport Impact Assessment, including an assessment of air quality, must accompany any planning application to develop the site. This must examine the additional transport impacts that the development of this site will generate. Actions to address impacts identified through the Transport Impact Assessment must accompany the development of the site, or be provided prior to the commencement of development.	Issue raised by Essex County Council during pre-submission consultation (comment 28).
74	3.280	Insert new paragraph below paragraph 3.280: <u>These sites may have potential to be of archaeological interest and this should be taken into consideration. No development shall commence within the area shown hatched on the approved drawing, before the applicant has secured the implementation of a programme of archaeological work, in accordance with a written scheme of investigation, which shall previously have been submitted to and approved in writing by the Local Planning Authority. The developer shall afford access to the sites at all reasonable times to an archaeologist nominated by Essex County Council and shall allow their observations of the excavations and records to be made of any items of interest. In this respect, not less than 48 hours notice shall be given in writing to the Local Planning Authority of the commencement of works requisite for the implementation of the permitted development.</u>	Issue raised by English Heritage during pre-submission consultation (comments 10 and 11).
74	3.280	Insert new paragraph below paragraph 3.280: <u>These sites are within a Minerals Safeguarding Area and therefore consultation on the proposed development of the sites</u>	Issue raised by Essex County Council during pre-submission consultation (comments 121 and 122).

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Page	Policy/ Paragraph	Minor Amendment	Justification
		<u>with Essex County Council is required.</u>	
75	3.281	The severance of the two sites has the potential to impact on the range of Sustainable Drainage Systems (SUDS) developed. <u>Attenuation and source control SUDS of a size proportionate to the development should be used such as balancing ponds, swales, detention basins and green roofs. These could be incorporated into the greenspace provided on and/ or adjacent to the site. Consideration would need to be given to the potential impact of certain types of SUDS on below ground archaeology.</u> Appropriate SUDS should be determined in consultation with Essex County Council <u>and the Environment Agency. A site specific flood risk assessment incorporating a surface water drainage strategy should be prepared for the sites.</u> A drainage strategy should be prepared for the site.	Issues raised by English Heritage (comment 42) and Essex County Council (comments 44 and 45) during pre-submission consultation.
75	3.282	The capacity constraints in relation to Southend Waste Water Treatment Works are noted (both wastewater transfer and transmission). This will have to be overcome at the design stage in conjunction with Anglian Water. The Works discharge to the Thames Tideway which falls under the Bathing Waters Directive and Shellfish Waters Directive. Therefore, before planning permission is granted, the applicant will need to demonstrate that there is adequate capacity in the Works and that the development will not prevent the objectives of the Bathing Waters Directive and Shellfish Waters Directive from being met. Early engagement with Anglian Water and the Environment Agency will therefore be necessary.	Issue raised by the Environment Agency during pre-submission consultation (comments 118 and 119).

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Page	Policy/ Paragraph	Minor Amendment	Justification
78	3.300	<p>Insert new paragraph below paragraph 3.300:</p> <p><u>The site may have potential to be of archaeological interest and this should be taken into consideration. No development shall commence within the area shown hatched on the approved drawing, before the applicant has secured the implementation of a programme of archaeological work, in accordance with a written scheme of investigation, which shall previously have been submitted to and approved in writing by the Local Planning Authority. The developer shall afford access to the site at all reasonable times to an archaeologist nominated by Essex County Council and shall allow their observations of the excavations and records to be made of any items of interest. In this respect, not less than 48 hours notice shall be given in writing to the Local Planning Authority of the commencement of works requisite for the implementation of the permitted development.</u></p>	Issue raised by English Heritage during pre-submission consultation (comments 10 and 11).
78	3.302	<p>Insert new paragraph below paragraph 3.302:</p> <p><u>A landscape strategy promoting green links and biodiversity corridors should be prepared for the site.</u></p>	Issue raised by Essex County Council during pre-submission consultation (comment 47).
86	5.16	<p>As this site does not extend westwards to meet St Johns Drive or follow an established boundary along its southern edge, a substantial green buffer to the west and south of the site will be required to ensure the defensibility of the Green Belt boundary in this location. The green buffer will not form part of the development area, but will be situated in the Green Belt to the west and south of the employment site. Existing trees on-site</p>	Issues raised by Essex County Council during pre-submission consultation (comment 147 and 148).

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Page	Policy/ Paragraph	Minor Amendment	Justification
		and along the boundaries of the site should be retained, and additional landscaping along the northern and eastern boundaries of the site should be provided. <u>Conditions will be attached to ensure that any greenspace provided on or off site has ecological value. A landscape strategy promoting green links and biodiversity corridors should be prepared for the site.</u>	
86	5.19	<p>Insert new paragraph below paragraph 5.19:</p> <p><u>The site may have potential to be of archaeological interest and this should be taken into consideration. No development shall commence within the area shown hatched on the approved drawing, before the applicant has secured the implementation of a programme of archaeological work, in accordance with a written scheme of investigation, which shall previously have been submitted to and approved in writing by the Local Planning Authority. The developer shall afford access to the site at all reasonable times to an archaeologist nominated by Essex County Council and shall allow their observations of the excavations and records to be made of any items of interest. In this respect, not less than 48 hours notice shall be given in writing to the Local Planning Authority of the commencement of works requisite for the implementation of the permitted development.</u></p>	Issue raised by English Heritage during pre-submission consultation (comments 10 and 11.
86	5.20	<p><u>Attenuation and source control</u> Sustainable Drainage Systems (SUDS) of a size proportionate to the development should be used such as balancing ponds, swales, detention basins and green roofs. This could be provided on-site and/or adjacent to the site on greenspace provided to the south. <u>Consideration</u></p>	Issues raised by English Heritage (comment 144) and Essex County Council (comments 145 and 146) during pre-submission consultation.

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		<u>would need to be given to the potential impact of certain types of SUDS on below ground archaeology.</u> Appropriate SUDS should be determined in consultation with Essex County Council <u>and</u> the Environment Agency. A site specific flood risk assessment <u>incorporating a surface water drainage strategy should be prepared for the site.</u> A drainage strategy should be prepared for the site.	
87	5.26	A Transport Impact Assessment, including an assessment of air quality, must accompany any planning application to develop the site. This must examine the additional transport impacts that the development of this site will generate. Actions to address impacts identified through the Transport Impact Assessment must accompany the development of the site, or be provided prior to the commencement of development.	Issue raised by Essex County Council during pre-submission consultation (comment 28).
87	5.27	A larger site on degraded greenfield land to the west of Rayleigh, at the junction of the A1245 and the A127, has been identified. There is existing access onto the site from the A1245, and additional potential access points to the south east of the site onto the A127 slip road and onto the A127 from the field to the west of the site.	Issue raised by Basildon Borough Council during pre-submission consultation (comments 155 and 156)
89	5.36	A Transport Impact Assessment, including an assessment of air quality, must accompany any planning application to develop the site. This must examine the additional transport impacts that the development of this site will generate. Actions to address impacts identified through the Transport Impact Assessment must accompany the development of the site, or be provided	Issue raised by Essex County Council during pre-submission consultation (comment 28).

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		prior to the commencement of development.	
90	5.45	There are pylons to the north west and south west of the site, and further to the east of the A1245. A substantial green buffer should be provided between this site and the adjacent Gypsy and Traveller site, to protect the amenity of residents. The size of the site allows for this, whilst accommodating the required employment uses. <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>	Issues raised by Essex County Council during pre-submission consultation (comment 147 and 148).
90	5.45	Insert new paragraph below paragraph 5.45: <u>The site may have potential to be of archaeological interest and this should be taken into consideration. No development shall commence within the area shown hatched on the approved drawing, before the applicant has secured the implementation of a programme of archaeological work, in accordance with a written scheme of investigation, which shall previously have been submitted to and approved in writing by the Local Planning Authority. The developer shall afford access to the site at all reasonable times to an archaeologist nominated by Essex County Council and shall allow their observations of the excavations and records to be made of any items of interest. In this respect, not less than 48 hours notice shall be given in writing to the Local Planning Authority of the commencement of works requisite for the implementation of the permitted development.</u>	Issue raised by English Heritage during pre-submission consultation (comments 10 and 11).

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Page	Policy/ Paragraph	Minor Amendment	Justification
90	5.48	Attenuation <u>and source control</u> Sustainable Drainage Systems (SUDS) of a size proportionate to the development should be used such as balancing ponds, swales, detention basins and green roofs. <u>Consideration would need to be given to the potential impact of certain types of SUDS on below ground archaeology.</u> Appropriate SUDS should be determined in consultation with Essex County Council <u>and the Environment Agency.</u> A site specific flood risk assessment incorporating a <u>surface water drainage strategy should be prepared for the site.</u> A drainage strategy should be prepared for the site.	Issues raised by English Heritage (comment 144) and Essex County Council (comments 145 and 146) during pre-submission consultation.
92	5.58	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. To the north, the landscaping should incorporate non-vehicular links to ensure the site is well connected to Great Wakering. <u>Conditions will be attached to ensure that any greenspace provided has ecological value.</u> A landscape strategy promoting green links and biodiversity corridors should be prepared for the site.	Issues raised by Essex County Council during pre-submission consultation (comment 147 and 148).
92	5.62	Insert new paragraph below paragraph 5.62: <u>During the design and construction phases of this site consideration should be given to the management plan for the Local Wildlife Site prepared as part of Policy SER9b.</u> <u>Disturbance of this site should be avoided.</u>	Issue raised by Essex County Council during pre-submission consultation (comment 171).
92	5.64	A Transport Impact Assessment, including an assessment of air quality, must accompany any planning application to develop the	Issue raised by Essex County Council during pre-submission consultation (comment 28).

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Page	Policy/ Paragraph	Minor Amendment	Justification
		site. This must examine the additional transport impacts that the development of this site will generate. Actions to address impacts identified through the Transport Impact Assessment must accompany the development of the site, or be provided prior to the commencement of development.	
92	5.65	<p>Insert new paragraph below paragraph 5.65:</p> <p><u>The site may have potential to be of archaeological interest and this should be taken into consideration. No development shall commence within the area shown hatched on the approved drawing, before the applicant has secured the implementation of a programme of archaeological work, in accordance with a written scheme of investigation, which shall previously have been submitted to and approved in writing by the Local Planning Authority. The developer shall afford access to the site at all reasonable times to an archaeologist nominated by Essex County Council and shall allow their observations of the excavations and records to be made of any items of interest. In this respect, not less than 48 hours notice shall be given in writing to the Local Planning Authority of the commencement of works requisite for the implementation of the permitted development.</u></p>	Issue raised by English Heritage during pre-submission consultation (comments 10 and 11).
92	5.65	<p>Insert new paragraph below paragraph 5.65:</p> <p><u>The site is within a Minerals Safeguarding Area and therefore consultation on the proposed development of the site with Essex County Council is required.</u></p>	Issue raised by Essex County Council during pre-submission consultation (comments 169 and 170).

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Page	Policy/ Paragraph	Minor Amendment	Justification
93	5.68	Attenuation <u>and source control</u> Sustainable Drainage Systems (SUDS) of a size proportionate to the development should be used such as balancing ponds, swales, detention basins and green roofs. <u>Consideration would need to be given to the potential impact of certain types of SUDS on below ground archaeology.</u> Appropriate SUDS should be determined in consultation with Essex County Council <u>and the Environment Agency.</u> <u>A site specific flood risk assessment incorporating a surface water drainage strategy should be prepared for the site.</u> A drainage strategy should be prepared for the site.	Issues raised by English Heritage (comment 144) and Essex County Council (comments 145 and 146) during pre-submission consultation.
102	7.5	The area within the residential allocation should have the following characteristics listed within Appendix D of the <u>Education Contribution Guidelines Supplement, for example:</u> <ul style="list-style-type: none"> • Roughly rectangular shape • Flat ground • Outside of flood risk area • Away from high-voltage power lines • Served by safe, direct pedestrian access well linked to nearby housing • Well related to new public transport links • Accessible via an adopted public highway with access to service buildings • Nearby roads can be traffic calmed 	Issue raised by Essex County Council during pre-submission consultation (comment 181).
103	7.9	The area within the residential allocation should have the following characteristics <u>listed within Appendix D of the</u>	Issue raised by Essex County Council during pre-submission consultation (comment 183).

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Page	Policy/ Paragraph	Minor Amendment	Justification
		<u>Education Contribution Guidelines Supplement, for example:</u> <ul style="list-style-type: none"> • Roughly rectangular shape • Flat ground • Outside of flood risk area • Served by safe, direct pedestrian access well linked to nearby housing • Well related to new public transport links • Accessible via an adopted public highway with access to service buildings • Nearby roads can be traffic calmed 	
103	7.13	Insert new paragraph below paragraph 7.13: <u>The site is within a Minerals Safeguarding Area and therefore consultation on the proposed development of the site with Essex County Council is required.</u>	Issue raised by Essex County Council during pre-submission consultation (comment 185).
104	7.15	There are 21 existing primary schools and four secondary schools in the District, many of which reside within the Green Belt. These important facilities should continue to be allocated for educational use. However, for those schools in the Green Belt, the existing developed part <u>(including school buildings and their curtilage)</u> will not retain its Green Belt designation to ensure that they can expand as appropriate to meet local need. The existing playing fields will retain this designation and in effect will have a dual designation of Green Belt and education to prevent unnecessary encroachment into the Green Belt.	Issue raised by Essex County Council during pre-submission consultation (comment 187).
130	Policy	Flood risk mitigation measures/ <u>defence works, required to make</u>	Issues raised by Environment Agency during

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Page	Policy/ Paragraph	Minor Amendment	Justification
	BFR3 (Potential Risk)	<u>the development safe from flooding for its lifetime,</u> cannot be delivered <u>and maintained in perpetuity</u> , resulting in the site not being suitable for housing.	pre-submission consultation (comment 32).