

Pre-submission Consultation Statement

This report has been produced in order to comply with Regulations 27 and 24 of The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008. A further detailed report on community involvement and consultation will be produced and submitted to the Secretary of State in accordance with Regulation 30 of the Act at the time of the submission of the Core Strategy.

Introduction

The development of the Rochford District Core Strategy has been an iterative process subject to a number of stages. The results of community involvement and stakeholder consultation at various junctures have played a significant role in developing the Core Strategy.

This document sets out, for each juncture in the production of the Core Strategy: 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 is not a full record of all of the issues which were raised during the various publication participation periods and does not contain the detailed content of all the representations. Copies of all the representations are available on request.

There are three key stages at which representations have been invited on Rochford's Core Strategy: Issues and Options (September 2006); Preferred Options (May 2007); and Revised Preferred Options (October 2008). In addition, pre-submission consultation on the Core Strategy will be undertaken.

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 Community Involvement new regulations¹ have come into force which have amended the consultation requirements for Local Development Documents, including the stages at which consultation is undertaken.

Such new regulations came into force midway through the production of the Core Strategy. As such, the Council have had regard to both the adopted Statement of Community Involvement and, where applicable, the new regulations.

In addition to that undertaken specifically on the Core Strategy, it is important to note that community involvement and consultation on various elements of the evidence base and other strategies which have influenced the Core Strategy has also taken place.

¹ The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008

Issues and Options

Rochford District Council produced its Core Strategy Issues and Options document in September 2006.

The Council engaged the community and other stakeholders through the actions set out in Table 1 below.

Table 1 – Consultation methods for Issues and Options

Event / method of consultation	Details
Public exhibitions / meetings	<p>Manned public exhibitions were staged in the following locations across the District, at various times, including at weekends, to maximise opportunities for people to attend:</p> <ul style="list-style-type: none"> • Canewdon Village Hall; • Clements Hall Leisure Centre, Hawkwell; • Ferry Road Car Park, Hullbridge; • Great Wakering Village Hall; • Hawkwell Village Hall; • Rayleigh High Street; • Rawreth Village Hall. <p>Exhibition material was also displayed at Rochford Council Offices, along with access to Officer advice during office hours.</p>
School workshops	<p>Secondary schools in the District were invited to partake in workshops on the Issues and Options. Workshops were held in King Edmund School, Rochford and Greensward Academy, Hockley. The results of these workshops is a published part of the LDF evidence base.</p>
Consultation letters to stakeholders	<p>Letter to key stakeholders, including all relevant bodies listed within Appendix E of the 2004 PPS12 (which has since been superseded by revised PPS12)</p>
Rochford District Matters – article and questionnaire	<p>Article and questionnaire contained within the Council's free newsletter which is distributed to nearly all households in the District.</p>
Press release	<p>Issued to local media</p>
Online questionnaire and information	<p>Available on the Council's website</p>
Posters	<p>A number of posters were displayed in various locations throughout the District, promoting the opportunity to participate in the plan-making process.</p>

The Council also made details of other independent sources of planning information, such as Planning Aid, available.

Summary of main issues raised during Issues and Options consultation

A summary of the main issues raised during Issues and Options consultation was presented to the Planning Policy and Transportation Sub-Committee on 15th February 2007. 370 representations were received. In addition, material produced at school workshops was drawn upon in analysing the response to the Issues and Options. The main issues raised under vis-à-vis the following themes are described below.

HOUSING

The general feeling is that there is already enough housing and that some settlements are full. Strong feeling that the green belt should not be built on. Common response is to develop brownfield sites in existing settlements. The option of providing a new settlement was largely rejected. No clear preference as to which settlements should take new housing and which should not. There is a need to improve infrastructure.

AFFORDABLE HOUSING

The general feeling is that more affordable housing is needed for local people. Strong feeling that too much expensive housing has been built over recent years. Housing for key workers also considered an issue, but difficulty in defining who is a key worker. Strong feeling that affordable housing must be available only to those who need it.

JOBS

The general feeling is that existing employment land is poor quality and needs updating. New employment land needs to be accessible and to have an attractive design. There is a need to improve infrastructure. Strong feeling that there should be no land released from the green belt, but instead that existing land should be redeveloped.

PROTECTION

The general feeling is that existing green belt, parks and countryside should be protected and that there should be better access to these areas, particularly on foot, bike or horse. Strong feeling that the Roach Valley and Hockley Woods are important, together with the Rivers Roach and Crouch. Need to enhance and advertise the green spaces. There was a feeling that the Council had done a good job in recent years to protect the district, but that it should over-focus on this.

CHARACTER

The general feeling is the district does have a distinct character, although this is good in Rochford and poor in Rayleigh. There is a strong feeling that landscaping and design are vital in planning process. There was a feeling that the Council had done a good job in recent years to ensure the retention of the character of district, but that it should over-focus on this. The idea of bringing back the local list was supported.

ENERGY & WATER

The general feeling is that there is a strong need for work to ensure that energy and water use is reduced and that opportunities are taken now to provide for the use of renewable energy sources and the recycling of water. There was a strong feeling that high standards have to be incorporated in new buildings, including water butts and solar panels. There was a feeling that large scale wind energy schemes should be offshore.

LEISURE, TOURISM & COMMUNITY FACILITIES

The general feeling is that facilities are about right, as there is no infrastructure to support extra facilities. There was a feeling that there should be more for youths to do in the evenings and that there was a need for a swimming pool in Rayleigh. There was a strong feeling that there is a lack of medical and dental facilities. There was a feeling that more use should be made of the rivers and their banks.

COMPULSORY PURCHASE & PLANNING OBLIGATIONS

There was a strong feeling that money raised from development should be spent locally and to resolve existing issues. There was a strong feeling that the approach put forward by the Council was reasonable. There was a feeling that compulsory purchase should be used as a last resort and not for road building.

How issues raised at Issues and Options stage were addressed

Issues raised at the Issues and Options consultation stage were incorporated into the production of the development of the next iteration of the Core Strategy – the Preferred Options. The key elements were reported to the Planning Policy Sub-Committee on 22nd March 2007, as follows:

- Inclusion of energy and water conservation as policy areas.

- Statement of the Council's preferred options for strategy gaps between settlements and the continuation of a restrictive policy framework for development in the green belt subject to relaxations for major developed sites, green tourism and renewable energy.
- Consultation responses confirmed the importance attached to the protection of the Upper Roach Valley, and this was reflected in the Preferred Options.
- Preferred options for protecting the Upper Roach Valley and developing the Cherry Orchard Jubilee Country Park.
- Preferred options specified for protecting the undeveloped coastline, special landscape areas, historic landscape and ancient woodlands and the development of policies to support and enhance biodiversity.
- Preferred Options includes comments on the relocation of bad neighbour sites and examination of the reuse of industrial sites for residential development.
- The preferred options for housing numbers and phasing were specified. An important element of housing provision is an analysis of the potential to use previously developed land in line with national guidance.
- Housing distribution based on tiers of settlement, with larger proportion to higher tier settlements.
- Proposed that the affordable housing target for the district be 30% of houses on sites of 10 units or greater.
- Preferred options include reference to a policy for the provision of health care facilities.
- Preferred options for energy and water conservation include reference to carbon neutral development.
- Preferred options in relation to lifetime homes, sustainable homes and the requirement for health impact assessments.

Preferred Options

In June and July 2007, the draft Core Strategy was subjected to 6 weeks of consultation.

The Council engaged the community and other stakeholders through the actions set out in Table 2 below.

Table 2 - Consultation methods for Preferred Options

Event / method of consultation	Details
Public exhibitions / meetings	<p>Manned public exhibitions were staged in the following locations across the District, at various times, including at weekends and evenings:</p> <ul style="list-style-type: none"> • Ashingdon Memorial Hall • Canewdon Village Hall • Great Wakering Memorial Hall

	<ul style="list-style-type: none"> • Hockley Parish Hall • Hawkwell Village Hall • Hullbridge Parish Council Offices • Rochford WI Hall • Rawreth Village Hall • Rayleigh High Street • Rayleigh Windmill
Consultation letters to stakeholders / members of the public	<p>Letters / emails to key stakeholders, including all relevant bodies listed within Appendix E of the 2004 PPS12 (which has since been superseded by revised PPS12).</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>
Rochford District Matters	Summary of the Core Strategy Preferred Options, together with information on how to comment was included within the free newsletter issued to most dwellings in the District.
Press release	Notices were published in local papers and a press release was issued via the Council's Corporate Communications Officer.
Online consultation system	The Council utilised its new online consultation system for consultation on the Core Strategy Preferred Options. The system allows respondents to submit and view comments online. A link to the system was placed on the main page of the Council's website, along with a rolling banner promoting the opportunity to participate.
Posters	Posters were displayed in a number of premises across the District, advertising the Core Strategy consultation and the public exhibitions in particular.

Summary of main issues raised during Preferred Options consultation

A total of 793 representations were submitted by 443 groups, organisations and members of the public. Details of all representations received are available to view online via the Council's consultation system and in paper format on request.

In addition to the representations received a petition with 328 signatures was submitted at the Hullbridge public exhibition. The petition stated "Please all support your village, sign below if you are opposed to the amount of building houses/flats in our village. We need more shops for the village."

The issue that by far and away elicited the most responses was that of the location and numbers of new housing. 459 representations related to this issue, 327 of which were objections, 114 comments and 18 in support. A large proportion of representations on this section were people objecting to addition development in their area of residence, the majority of which were objections to the allocation for Rayleigh, or respondents promoting development on particular sites.

The main issues raised by members of the public were as follows:

- There is too much residential development proposed for the settlement in which the respondent resides;
- There is no need for additional housing in the District;
- It is not clear where new development is proposed to go;
- Green Belt land should not be developed;
- Residential intensification is unwelcome;
- There is not enough infrastructure to support more housing;
- Roads are too congested;
- The District's green, open spaces are popular;
- Antisocial behaviour is a concern;
- There needs to be more for young people to do;
- Any new accommodation should be affordable;
- The District's character is liked. The historic character, in particular, needs to be protected;
- Local shops are popular;
- More village shops are needed;
- Community spirit is strong in the District's settlements;
- New development should be environmentally friendly.

Representations from both members of the public, statutory bodies and other organisations expressed concern regarding the lack of detail as to where new development will be located, the quality of the evidence base used to arrive at the preferred options, and the impact on infrastructure from new development.

When the drafting of the Core Strategy Preferred Options was originally undertaken, guidance inferred that the Core Strategy should not deal with specific development locations – this being left for the Allocations Development Plan Document – but should instead deal with broad issues and set out the Council’s general approach to future development. However, responses from statutory consultees, including GO East, suggest that more detail is required at the Core Strategy Preferred Options stage than was provided in the Council’s draft.

How issues raised at Preferred Options stage were addressed

Having regard to the results of the consultation carried out on the Core Strategy Preferred Options, the Council resolved to revisit the Preferred Options stage and produce a revised Core Strategy Preferred Options document providing greater detail on general locations for development and empirical evidence to support the preferred options.

This resulted in the development of an improved evidence base and the production of a revised Core Strategy Preferred Options document which set out general locations and quantum in more detail. This revised Core Strategy also set out, within its introduction, how the views submitted by members of the public on the original Preferred Options document had been addressed, in the form of the following table:

Table 3 – Extract from Core Strategy Revised Preferred Options (2008) setting out how views submitted in response to previous iterations of the Core Strategy had been addressed

What you told us previously	What we have done this time
There is too much residential development proposed for our village / town.	We have reconsidered the issue of housing distribution having regard to the updated evidence base together with the implementation of other new strategies / developments since last year.

What you told us previously	What we have done this time
<p>Why do we need to accommodate any more houses in the District?</p>	<p>The East of England Plan requires Rochford District to ensure at least 4,600 additional dwellings are built in the District between 2001 and 2021.</p> <p>Rochford's allocation is based on meeting current and future need.</p> <p>Current need encompasses the number of people in the District who are living within a household wanting to move to their own accommodation and form a separate household but unable to do so (e.g. adult children).</p> <p>Projected need is derived from the supposition that the population is projected to increase from 81,300 in 2007 to 87,000 by 2021.</p>
<p>It is not clear where new development is proposed to go.</p>	<p>The purpose of the Core Strategy is not to identify specific locations but indicate general areas for development. More precise locations, submitted as part of our 'call for sites' exercise, will be appraised within the Allocations Development Plan Document.</p>
<p>Green Belt land should not be developed.</p>	<p>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.</p>
<p>Intensification of existing residential areas (e.g. replacing one house with many, within the same space) is unpopular.</p>	<p>We recognise this concern and propose, as far as practicable, to limit the intensification of existing residential areas, preventing redevelopment which is not in keeping with the density or character of the area.</p>
<p>There is not enough infrastructure to support more housing.</p>	<p>We recognise the need to provide additional infrastructure and improve existing infrastructure where necessary. The Core Strategy outlines in broad terms what infrastructure will be required and how this will be delivered.</p>

What you told us previously	What we have done this time
Our roads are too congested.	In determining areas of future development, the fact that accessibility to public transport and the reliance on the use of the car is unequally distributed across the District has been taken into consideration. Actions to promote alternatives to the car such as walking and cycling are proposed.
We like the District's green, open spaces.	Green spaces within urban areas are part of the social fabric of the community and will be protected. The District itself is predominantly rural and we aim to minimise the development of Green Belt land. Where the release of Green Belt land is unavoidable, Green Belt land which contributes least towards the purposes of the Green Belt will be favoured for development over other Green Belt locations.
We are concerned about anti-social behaviour.	Anti-social behaviour is a complex issue but we recognise that planning has an important role to play. From the design of new developments to ensure that natural surveillance deters anti-social behaviour, to the redevelopment of
We are concerned about anti-social behaviour (continued)	Rochford and Hockley town centres incorporating more community and youth facilities, to providing environments that all of the community can take pride in and ownership of, concerns regarding anti-social behaviour have been incorporated.
There needs to be more for young people to do.	We propose additional youth facilities. Young people will be consulted on what facilities they require, and their views will be incorporated into the development of these facilities where a need has been identified.
Any new accommodation should be affordable.	We propose that a proportion of housing provided within new residential development is affordable housing - housing that is available to buy or rent below the normal market value. It is, however, not feasible to require developers to provide 100% affordable housing on any one site.

What you told us previously	What we have done this time
We like the character of the District. The historic character, in particular, needs to be protected.	We are committed to the preservation of the District's historic towns and villages. Provisions such as the extension of certain Conservation Areas and the reintroduction of a Local List of important buildings aim to prevent insensitive alterations to important areas.
We like our local shops / our village needs more shops.	We will support the development and preservation of shops within villages which serve everyday needs. The main focus of retail enhancement will be within Rayleigh, Hockley and Rochford town centres.
There is a good community spirit in our town / village.	'Sustainability' is the key vision for the future. To achieve this, it is essential that settlements are developed as necessary to maintain a vibrant and prosperous environment for future generations. We recognise the importance of community and this has been considered in all aspects of the Core Strategy, from the proposed housing distribution, to retail and town centre policies, to the proposed community facilities and leisure policies.
New development should be environmentally friendly.	We propose to require high environmental standards from new developments. Proposed policies within the Core Strategy address this, for example by requiring developments to meet certain standards of the Code for Sustainable Homes.

Core Strategy Revised Preferred Options

In October 2008 the Council published the Core Strategy Revised Preferred Options. The Core Strategy Preferred Options was subject to consultation and community involvement between 5 November and 17 December 2008.

Table 4 below outlines the methods used to engage the community and other stakeholders.

Table 4 – Consultation methods for Revised Preferred Options

Event / method of consultation	Details
Public exhibitions	<p>Unmanned public exhibitions were staged in the following locations across the District, for the duration of the consultation period:</p> <ul style="list-style-type: none"> • Great Wakering Community Centre • Canewdon Village Hall entrance • Hockley Old Fire Station • Rochford main Council Offices • Hawkwell Clements Hall leisure centre • Hullbridge library • Rayleigh leisure centre
Public meetings	<p>Public meetings were held at the following locations during the consultation period:</p> <ul style="list-style-type: none"> • Hawkwell Village Hall; • Rochford Primary & Nursery School, Ashingdon Road, Rochford; • Edward Francis Junior School, Rayleigh <p>The meetings were held in the evening. A presentation was given explaining the Core Strategy Preferred Options document and how to submit comments on the document. This was followed by a session where attendees had the opportunity to ask Officers and Members questions on the proposals.</p>
School workshops	<p>Secondary schools in the District were invited to partake in workshops to obtain the views of students on the Revised Preferred Options. Workshops were held at Fitzwimarc School, Rayleigh; Greensward Academy, Hockley; and Kind Edmund School, Rochford.</p>
Commuter consultation	<p>Officers issued leaflets outside of the District's three train stations during rush-hour. The leaflets provided an explanation of what the Core Strategy Preferred Options was and how representations could be made.</p>
Consultation letters to	Those on the Council's Local Development

stakeholders / members of the public	<p>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>Specific consultation bodies were consulted by letter or email. A list of the specific consultation bodies consultation is attached as Appendix 1.</p>
Rochford District Matters	Summary of the Core Strategy Revised Preferred Options, together with information on how to comment was included within the free newsletter issued to most dwellings in the District.
Press release	Press release was issued via the Council’s Corporate Communications Officer.
Online consultation system	The Council utilised its new online consultation system for consultation on the Core Strategy Preferred Options. The system allowed respondents to submit and view comments online. A link to the system was placed on the main page of the Council’s website, along with a rolling banner promoting the opportunity to participate.
Posters	Multiple, location-specific designs explaining sources of information at various locations across the District.

Summary of main issues raised during Revised Preferred Options consultation

A total of 1331 representations were formally submitted from 417 respondents.

The issue of housing elicited the most responses. The majority of representations were objections by members of the public to the principle of further residential development in their area and the district generally. There was spatial variance in such objections, with a greater level of response to development in South Hawkwell and Land North of London Road, and fewer representations in respect of other general development locations.

Whilst the details of representations varied recurring themes were identifiable, including concern with regard to the need for improvements to infrastructure (particularly roads), the loss of Green Belt land and the impact on character of place and community.

A number of alternative housing development locations were suggested, particularly in respect of Rayleigh, where the suggestion of dispersing the development to smaller sites, including to the east of the town, was made. Conversely, other representations expressed concern that residential development was being too thinly spread through too many smaller sites, making the implementation of new infrastructure unviable. There was no real consensus on how housing should be distributed. The development of a new settlement was suggested in order to meet the District's housing requirements.

Some representations suggested that the Urban Capacity Study 2007 underestimated the capacity of previously developed land, with agents suggesting that the development quantum of specific sites could be increased.

The East of England Regional Assembly consultation response stated that there were no major conformity issues between the Core Strategy Revised Preferred Options and the East of England Plan.

A number of submissions reminded the Council of the need to ensure that the Core Strategy is deliverable, particularly in relation to economic viability.

A more detailed summary of the representations received are outlined in Appendix 2.

How issues raised at Revised Preferred Options stage were addressed

The results of the consultation on the Revised Preferred Options were presented to the Local Development Framework Sub-Committee on 1st July 2009. This included the summary of representation attached to this report as Appendix 2. Results of the school workshops were also presented to Members of the Local Development Framework Sub-Committee.

It was resolved at the Local Development Framework Sub-Committee on 1st July 2009 that:

- a) That a District-wide tour for Members, encompassing all potential development locations, be organised and undertaken to assist Members in consideration of the Submission version of the Core Strategy.
- b) That further meetings of the Sub-Committee be arranged to consider the contents of the Submission version of the Rochford Core Strategy.

A summary of some of the most significant changes resulting from responses to the Core Strategy Revised Preferred Options are listed below by theme.

HOUSING

The Council undertook further work on identifying additional sources of deliverable, housing supply within existing settlements, seeking to reduce the need for Green Belt release. This resulted in amendments to the Housing preferred options, with the removal of some Green Belt general locations and the insertion of strategic brownfield sites.

The development of a new settlement was not considered a viable option. A new settlement had been considered as part of the Core Strategy Issues and Options, but following consultation and appraisal, it was ascertained that such an approach would be unsustainable, unviable and undeliverable.

In response to concerns about congestion, the Core Strategy Submission Document includes additional travel plan requirements for developments, as well as identifying specific highway improvements. The Council has also resolved to produce a Transport Strategy Supplementary Planning Document which will address the issue in detail.

Following concerns expressed with regards to general infrastructure provision, the infrastructure requirements set out in the Core Strategy were revisited in conjunction with Essex County Council.

The phasing of development has been amended to account for concerns expressed at Revised Preferred Options stage vis-à-vis deliverability and viability.

Requirement for a new healthcare facility to be incorporated within the development of land to the north of London Road, Rayleigh has been dropped following concerns that this location was too far from the town centre for such a facility.

CHARACTER OF PLACE

Policy on the protection of the sites of historical and archaeological importance has been incorporated into the Revised Preferred Options policy on natural landscape and habitats, following concerns that this issue had not been addressed.

ENVIRONMENTAL ISSUES

Policy on flood risk has been amended to account for Environment Agency's suggestion that the Core Strategy should seek to capitalize on opportunities to make space for water wherever possible.

Policies on Code for Sustainable Homes and BREEAM standards have been amended to take into account concerns re viability and deliverability.

Wording to the policy on large scale renewable energy projects has been altered so that it is more positive, addressing concerns that the text in the Revised Preferred Options was too negative.

A policy requiring a proportion of the energy requirement of new development to be generated from decentralised and renewable or low-carbon sources was added following comments received on the Revised Preferred Options.

COMMUNITY INFRASTRUCTURE, LEISURE AND TOURISM

Policies on education provision include greater emphasis on early years and childcare facilities having regard to comments from Essex County Council School Organisation & Planning.

Policy on Rayleigh Town Centre in Core Strategy Submission Document includes exploration of potential locations for a healthcare centre in the town centre.

A threshold for Health Impact Assessments for new development has been included within policy.

ECONOMIC DEVELOPMENT

Economic development policies have been amended to account for the importance of SMEs and developing adult skills. Specific employment allocations to be reviewed have been identified in the Core Strategy.

IMPLEMENTATION, DELIVERY AND MONITORING

This section has been greatly expanded upon.

Appendix 1 – Specific consultation bodies consulted on Revised Preferred Options.

Althorne Parish Council
Anglian Water Services Ltd
Arriva Southern Counties
Ashingdon Parish Council
Barling Magna Parish Council
Basildon District Council
British Wind Energy Association
Burnham on Crouch Town Council
c2c Rail & National Express East Anglia
Canewdon Parish Council
Castle Point Borough Council
Chelmsford Borough Council
Coal Authority
CPREssex
Crouch Harbour Authority
Defence Estates
DEFRA
Disability Essex
East of England Development Agency
English Heritage
Environment Agency
Essex & Suffolk Water
Essex Autistic Society
Essex Bridleways Association
Essex Chambers of Commerce
Essex County Council
Essex Libraries
Essex no 1 Circuit of Jehovah's Witnesses
Essex Police Authority
Essex Wildlife Trust
Essex Wildlife Trust Rochford & Southend Area
Essex Youth Service
Federation of Small Businesses
First Essex Buses
Foulness Parish Council
Go-East
Great Wakering Parish Council
Grove Park Residents Association
Gypsy Council for Education Welfare & Civil Rights
Hawkwell Action Group
Hawkwell Parish Council
Hawkwell Residents Association
Health & Safety Executive

Highways Agency
Hockley Chamber of Trade
Hockley Parish Council
Hockley Parish Plan Group
Hockley Residents Association
Home Builders Federation
Hullbridge Parish Council
Leigh Town Council
Little Burstead Parish Council
London Southend Airport
London Southend Airport Co Ltd
Maldon District Council
Mobile Operators Association
Nataional Farmers Union Rochford
National Grid Gas
National Trust
National Wind Power
Natural England
Natural England
Network Rail
Noak Bridge Parish Council
North Fambridge Parish Council
Paglesham Parish Council
Planning Inspectorate
Post Office Ltd
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
Roach Area Fairways and Conservation Committee
Rochford & District Chamber of Trade & Commerce
Rochford & Rayleigh CAB
Rochford Chamber of Trade
Rochford District Access Committee
Rochford Hundred Amenity Society
Rochford Hundred Golf Club
Rochford Parish Council
Royal Mail Group C/o Atisreal
RSPB
Runwell Parish Council
SE Essex Organic Gardeners
SEETEC
Society for the Protection of Ancient Buildings
South East Essex Friends of the Earth
South East Essex Green Party
South East Essex PCT
South Essex Natural History Society
South Woodham Ferrers Town Council
Southend-on-Sea Borough Council
Southminster Parish Council
Sport England
Stambridge Parish Council

Stow Maries Parish Council
Sustrans
Sutton Parish Council
Theatres Trust
Woodham Ferrers & Bicknacre Parish Council
Woodland Trust

Appendix 2 – Summary of comments on Core Strategy Revised Preferred Options

Summary of National, Regional and Local Government Comments on the Introduction

Introduction	
Organisation	Summary of representation(s)
GO East	<p>Commend the Council for the work carried out so far.</p> <p>Suggest that the final version provides greater detail on the evolution of the document.</p> <p>Final document should express policies in the form of firm actions.</p>
East of England Regional Assembly (EERA)	EERA state that overall, the preferred options put forward in the Core Strategy respond well to the Regional Spatial Strategy. There are no major conformity issues. EERA have some minor concerns with the amount of development proposed for greenfield sites and the Council's position with regards to larger renewable energy schemes.
East of England Development Agency (EEDA)	Note the importance of the Thames Gateway area in economic growth and suggest the ambitions of the Thames Gateway be included within the Core Strategy.
Rochford Parish Council	Comment that whilst it is necessary to look at sites for new housing, employment etc, existing infrastructure will have to be vastly improved and that the relevant Councils need to address such issues.
Rayleigh Town Council	<p>Contrary to the stated role of the Core Strategy, the location referred to as 'North of London Road' identifies a specific site, ruling out other suitable sites identified from the 'Call for Sites' exercise. This should be reworded to allow other areas to be considered.</p> <p>The area around Rawreth Lane and London Road suffers considerable congestion. This situation will be exasperated by the development of additional housing in the area.</p> <p>Express further concerns with regards to the road situation in this part of Rayleigh, including:</p> <ul style="list-style-type: none"> • Traffic from three schools existing onto roads • Traffic from E-On call centre exiting onto London Road • A127 is already exceeding its designated capacity • A130 is near to the limit of its capacity • Poor transport along London Road for older residents visiting Southend and Basildon hospitals • Shopping problems for all without cars • Lack of direct bus service to ASDA, Rawreth

	<p>Lane</p> <p>Note that there is no reference to any brownfield sites in Preferred Options H2 which appears to be a contradiction of preferred option on phasing and stated preference for brownfield sites.</p> <p>States that the argument as to why 'North Rayleigh' is not a preferred option in H2 is equally relevant to 'North of London Road'.</p>
Essex County Council	<p>Suggest a number of additional county strategies be added to the list of relevant strategies in the 'Additional Relevant Strategies' section.</p> <p>Suggest that reference to the historic environment is made and that the preferred option is included stating the need to protect the historic environment.</p>

Characteristics, Issues and Opportunities

Organisation	Summary of representation(s)
GO-East	<p>Comment that the Council may wish to distinguish its 'spatial portrait' (and term it as such) from the other forms of characteristics, issues and opportunities.</p> <p>Text on page 14 which appears to be suggesting that the average household size in Rochford is a function of the relatively large number of families could be expressed in a clearer manner.</p>
Hawkwell Parish Council	<p>State that they are incensed by the failure to recognise Hawkwell as a settlement in its own right</p> <p>State that Hawkwell is the biggest Parish by population and second only to Rayleigh Town but appears to have been subsumed into Hockley.</p> <p>Express concern that as a settlement which is ignored in the Core Strategy, they are having little say on the future allocation of housing for the Parish.</p>

Vision

Organisation	Summary of representation(s)
Essex County Council	<p>Suggest revising the scale of the Key Diagram because some of the illustrated features are too small to easily and readily identify. The Key Diagram should be diagrammatic and not shown on a map base.</p> <p>Key spatial issues between topics should be elaborated on, particularly the relationship between homes, jobs and community facilities and the balance between built-up areas and valued environments</p>
Hawkwell Parish Council	<p>State that they are incensed by the failure to recognise Hawkwell as a settlement in its own right</p> <p>State that Hawkwell is the biggest Parish by population and second only to Rayleigh Town but appears to have</p>

	<p>been subsumed into Hockley.</p> <p>Express concern that as a settlement which is ignored in the Core Strategy, they are having little say on the future allocation of housing for the Parish.</p>
GO East	<p>Text referring to vision appears to be based upon the separate document 'Vision to Reality'. The statement which is set out amounts to little more than a 'statement of intent'. The vision should be expressed much in the same way as it has been expressed in the text boxes at the start of each themed-based section.</p> <p>Expression of vision within text boxes is an unconventional way of doing it and Council should be satisfied that it is an appropriate method.</p> <p>Linkage between vision, what is written in text boxes and subsequent text is inconsistent and confusing.</p>

Summary of National, Regional and Local Government Comments on the Housing Chapter

Housing Introduction	
Organisation	Summary of representation(s)
GO East	The Core Strategy should avoid repeating national policy. In some sections supporting text repeats national planning policy statements (PPS). References to PPS should be avoided in policies.
Rayleigh Town Council	State that Local Area Agreement Priority 5 (Essex Roads are safer, less congested and everyone has access to essential services) is unrealistic as it ignores the fact that public transport is poor with little prospect of improvement and walking or cycling are not viable alternatives for the not so young or fit.
Hawkwell Parish Council	<p>Cannot agree that finding locations for almost three and a half thousand new homes (or a 10% increase) should be addressed on the basis of cramming them into existing settlements. Suggest that this requires a much more strategic view and the piecemeal approach based on a 'call for sites' is totally inadequate.</p> <p>Believe there is strong argument that a new settlement would be far greener and thus, in the longer term, more sustainable than a myriad of smaller in fill sites. This option must not be rejected out of hand as is currently the case</p>

Preferred Option H1 – Distribution	
Organisation	Summary of representation(s)
East of England Regional Assembly (EERA)	In accepting that the government target for at least 60% of new development to be accommodated on previously developed land might not be achievable in all areas of the region, the Council is encouraged to maximise the development potential of all brownfield sites, including

	windfall sites.
Castle Point Borough Council	<p>Support the approach to prioritise previously developed land and recognise the need to develop on the edge of urban areas in order to avoid over-development of existing settlements.</p> <p>Potential development sites on the edge of settlements should be assessed in terms of how they contribute towards the purposes of the Green Belt, as stated in PPG2.</p>
Hawkwell Parish Council	<p>Do not believe that the preferred options constitute a balanced strategy.</p> <p>Express concern that proposed option to resist intensification is contrary to current approach and that it will not be enforced.</p> <p>Are concerned that the interpretation of sustainability has been insufficiently addressed and request that any proposal for a specific site be accompanied by a clear and unequivocal statement of the results of the test of sustainability and that only developments where the assessment shows a clear positive result in respect of sustainability are approved. Furthermore we would request that each site is tested against the sustainability test developed for a 'new' settlement to allow a fair comparison of advantages and disadvantages.</p> <p>Note that government policy is that 60% of the development should be on brown field sites and the balance on green field. Note the indications emerging from the Core Strategy document seem to have reversed the policy with the higher percentage on green field sites and the balance on brown field.</p>
GO East	Comment that there should be a cross reference between policy on distribution and policy on general locations.
Essex County Council	<p>Suggest amendment that Core Strategy promotes residential development at a density of 75+ dwelling per hectare in town centres in order to reduce requirement for Green Belt release.</p> <p>Support the prioritisation of previously development land for development.</p>

General Locations and Phasing

Organisation	Summary of representation(s)
Rochford Parish Council	<p>Express concern at lack of identification of precise locations.</p> <p>Express concern with regards to the ability of infrastructure to cope with the District's housing requirement.</p>

	<p>Acknowledge that additional housing in the District is necessary.</p> <p>Development could be added onto existing areas but suggest that a new village be created towards the Rawreth Lane / London Road area of Rayleigh. Suggest that the new village include retail, education, recreational, health, community and public transport facilities.</p>
Essex County Council	Essex County Council wish to clarify, in relation to reference to viability of small schools in the document, that there is a presumption against the closure of rural schools.
Rawreth Parish Council	<p>State that they are extremely disappointed at the lack of integrity by Members of the Local Development Framework sub-committee regarding the allocation figures for housing in the District.</p> <p>Rawreth has not appeared in previous paperwork and should be considered a Tier 4 settlement.</p> <p>Rawreth is not part of, and should be considered separate from, Rayleigh.</p> <p>Development of 1050 dwellings within Rawreth represents a 228% increase and is unjustifiable, unsustainable and would destroy the character of Rawreth.</p>

Preferred Option H2 – General Locations and Phasing	
Organisation	Summary of representation(s)
Hawkwell Parish Council	<p>Acknowledge the strong opposition to any development of Green Belt in Hawkwell by many residents.</p> <p>Recognise external pressure to provide additional homes.</p> <p>Note that discussions and consultations today will influence the District for decades to come.</p> <p>The Core Strategy Preferred Option appears to distribute housing on an uneven basis.</p> <p>Strongly object to being subsumed into a settlement called Hockley / Hawkwell, and then being subjected to the majority of housing allocated to Hockley / Hawkwell.</p> <p>Hawkwell Parish Council's preferred option to deliver housing requirement is through the creation of a single new community, along with the required infrastructure. Such community would ideally be located West / North-West of the District to allow best access to public transport and road network.</p>

	<p>If the construction of a new community is rejected the policy of Hawkwell Parish Council is, in summary, as follows:</p> <ul style="list-style-type: none"> • Development should be shared between Parishes using a calculation based on Parish hectares or population • New development within the Parish must have minimum impact on Green Belt and not increase the village footprint. • Planning Authority should use Compulsory Purchase to ensure minimum impact on Green Belt and that village footprint is not enlarged. • Infrastructure should be in place prior to development.
Essex County Council	<p>Register support for the balanced approach to the distribution of housing based on tiers of settlement.</p> <p>However, Essex County Council also registered an objection to the same Preferred Options stating that locations North of London Road, Rayleigh and South East Ashingdon should be further examined. The former to ensure that infrastructure will serve the development in a timely and efficient manner and also give benefit to the existing adjoining community. The latter to ensure that the scale of development would not place undue pressure on the highway network passing through Rochford town centre.</p> <p>Essex County Council also comment that the provision of County Council services at all proposed development locations will require adequate funding through planning obligations and standard charges.</p>
Rawreth Parish Council	<p>Reference to Rayleigh West in fact menas Rawreth. The area to the north of London Road is not Rayleigh but Rawreth.</p> <p>The Parish Council believe that the area to the north of London Road is highest quality farmland. The area is the “Gateway to Rochford” and is a strategic buffer between Rayleigh and Wickford.</p> <p>The area is a greenfield site. There are a number of sites identified as part of the Call for Sites that should be considered ahead of land North of London Road. Theses sites need to be visited and considered before a final decision is made.</p> <p>Describe the housing proposal as unjust.</p> <p>The development would not benefit the Parish.</p> <p>Parish of Rawreth does not have the infrastructure to cope with any more development. No development</p>

	<p>should take place until infrastructure is in place, and the roads are capable of taking the increased traffic that would result from development.</p> <p>Drains and sewers are close to capacity. Localised flooding already occurs and increased house building will exasperate the situation.</p> <p>Rawreth Lane is regularly at a standstill.</p> <p>Suggest that a figure of 40 dwellings would be a fairer figure for the Parish.</p> <p>West Hullbridge development would also cause traffic problems.</p> <p>Watery Lane / Hullbridge Road is an extremely dangerous junction.</p> <p>Question where traffic would go once it reaches the end of Watery Lane, as the bridge at Battlesbridge is restricted and the junction with A1245 is dangerous.</p> <p>The Parish Council believe that RDC should consider the use of smaller sites and that a large development to the North of London Road should be refused.</p> <p>The Parish Council are currently in the process of developing a community garden in the centre of Rochford and suggest that a reasonably sized development of houses in this area could be of benefit to the village. They suggest that a development of this size could include a village shop that would be of enormous value to local residents.</p>
--	--

Affordable Housing	
Organisation	Summary of representation(s)
Hawkwell Parish Council	<p>Expect any new development to include a mix of properties encompassing 'affordable', 'social' and others that encourages a broad demographic spread and sustains a housing chain that may include, where absolutely necessary, flat/apartment developments of no more that three stories and in the 'Garden Flat' style.</p> <p>Loss of bungalows by way of conversion to executive homes has resulted in the loss of affordable dwellings from the housing supply.</p> <p>The Planning Authority need to create a positive and direct link between employment and accommodation.</p> <p>Request that the term 'affordable' be more clearly and</p>

	realistically defined. Note that the recent Roach Close development is beyond the means of local people who wish to get onto the housing ladder without social need.
Ashingdon Parish Council	Comment that they accept that more homes must be built in the District. State that sharing homes around equally seems reasonable.

Gypsy and Traveller Accommodation

Organisation	Summary of representation(s)
East of England Regional Assembly (EERA)	EERA welcome the preferred option to make provision in line with recommendations set out in the Regional Spatial Strategy Single Issue Review.

Summary of National, Regional and Local Government Comments on the Green Belt Chapter

Protection of the Green Belt

Organisation	Summary of representation(s)
Rayleigh Town Council	Strongly agree with the five purposes of the Green Belt set out at the beginning of the section.
Rochford Parish Council	Green Belt release should only occur if absolutely necessary and must be limited and tightly controlled.
Ashingdon Parish Council	The Green Belt must be protected as much as possible; every scrap of brownfield land should be sensitively used.

Preferred Option GB1 – Protection of the Green Belt

Organisation	Summary of representation(s)
GO East	Clear intentions on how actions will be delivered are required.
East of England Regional Assembly (EERA)	Where the release of Green Belt in order to accommodate required levels of development is unavoidable, the proposal to use that which least contributes to the main purposes of the Green Belt seems appropriate.
Castle Point Borough Council	Support the protection of the Green Belt and the release of Green Belt based on how well the land helps to achieve the purposes of the Green Belt and separation of settlements.

Preferred Option GB2 – Rural Diversification, Green Tourism and Recreational Uses

Organisation	Summary of representation(s)
Sport England	Supports GB2, however careful guidance in terms of siting and design will be needed.
Natural England	Support rural diversification within the Green Belt such as green tourism and outdoor recreation, provided these activities are linked with environmental enhancements and an increase in biodiversity.

Summary of National, Regional and Local Government Comments on the Economic Development Chapter

Economic Development Introduction	
Organisation	Summary of representation(s)
GO East	Policies in the Core Strategy need to relate to firm actions
Rochford Parish Council	Believe that there are very few people who do not want the airport to succeed but the overwhelming concern is regarding 24 hour operational action at the airport, and with the proposed obvious increase in flights, quite a large proportion of the residents of both Rochford and Southend would have very little sleep. This would cause enormous health and economic problems.

Preferred Option ED1 – London Southend Airport and Environs	
Organisation	Summary of representation(s)
East of England Regional Assembly (EERA)	Note that the delivery of London Southend Airport is regionally significant. Refer the Council to their earlier comments submitted as representations on the Joint Area Action Plan.
East of England Development Agency (EEDA)	Note that the Regional Economic Strategy identifies the airport as having the potential to be a gateway for Thames Gateway. Welcome the Area Action Plan approach, adding that it should ensure that the role of the airport and its potential as a focus and catalyst for economic growth is fully harnessed and developed.
Essex County Council	Support the comprehensive development of London Southend Airport, although a commitment to work to mitigate any adverse impacts on the environment or local amenities should be clearly stated. The Core Strategy should also explore how it could support the take-up of these jobs through adult learning and re-training opportunities.
Natural England	Natural England are concerned with the impact of the growth in the airport on air quality and on the disturbance of Natura 2000 sites (sites of international ecological importance protected by legislation).
Hawkwell Parish Council	There is too much reliance on the development of the airport and its environs, involving the release of Green Belt. It appears to be assumed that the new residents will work there, thus justifying the large housing allocation in or adjacent to the Parish.

Preferred Option ED2 – Employment Growth	
Organisation	Summary of representation(s)
East of England Development Agency (EEDA)	Support option but suggest it is strengthened with inclusion of reference to providing a range of employment uses.
Essex County Council	Support the approach, including focus on specific regeneration projects but believe the Core Strategy

	<p>should also consider a contingent approach in the event such projects are delayed.</p> <p>Believe that the document does not take enough account of the small businesses dotted between the various industrial estates and elsewhere. The balance should be redressed by setting out how the vision and strategy will assist such small businesses to develop and fulfil a future role in the local economy.</p> <p>Suggest acknowledgement of the medical sector in Rochford and the importance of developing adult skills.</p>
Rawreth Parish Council	<p>Object to loss of Green Belt for employment to the south of London Road. Suggest an area bounded by A127, A130, A1245 and railway line as an alternative. This would provide an opportunity to provide a well-designed industrial estate with potential to utilise alternative forms of transport in the future.</p> <p>Suggest use of land opposite Michelin Farm to provide some of the required Gypsy and Traveller pitches and to remove the unauthorised site on the A1245 at Bedloes Corner.</p>

Preferred Option ED3 – Exiting Employment Land

Organisation	Summary of representation(s)
GO East	<p>Existing employment sites to be reviewed should be specifically identified in the document.</p> <p>Allocations in terms of quantum of floorspace should be set out.</p> <p>Different uses and their locations should be set out.</p>

Preferred Option ED4 – Future Employment Allocations

Organisation	Summary of representation(s)
Rayleigh Town Council	<p>State that reliance on the A127 and A130 links cannot be guaranteed ad infinitum.</p> <p>The general area indicated was apparently ruled out for housing development by the Highways Agency and would therefore be unsuitable for commercial and industrial use.</p>

Alternative Option ED4 – Future Employment Allocations

Preferred Option ED5 – Eco-Enterprise Centre

Organisation	Summary of representation(s)
Essex County Council	<p>Support this approach, but warn that the viability of such projects will need to be carefully considered.</p> <p>Note that there are a number of other such centres around the County and that this centre should offer something which differentiates it from competing centres.</p>

Castle Point Borough Council	Encourage the Council to prepare evidence that demonstrates the deliverability of the eco-enterprise centre.
Rayleigh Town Council	Statement is too vague and location is not indicated.

Summary of National, Regional and Local Government Comments on the Environmental Issues Chapter

Protection and Enhancement of the Natural Landscape and Habitats	
Organisation	Summary of representation(s)
Natural England	<p>Pleased to see mention made of intention to support the Crouch and Roach Management Plan.</p> <p>State that the Council should also be seeking to enhance biodiversity through development in accordance with PPS1 and PPS9. This will involve retaining existing natural features within any development and seeking opportunities to create new habitats and link in with existing adjacent habitats.</p>

Preferred Option ENV1 – Protection and Enhancement of the Natural Landscape and Habitats	
Organisation	Summary of representation(s)
Natural England	<p>Supports the overall aims of ENV1, but would like to see the following to be included in the final policy:</p> <ul style="list-style-type: none"> • Wildlife Networks • Designing in Wildlife • BAP Targets • Landscape Character
Natural England	<p>Supports the overall principles of ENV2, but would suggest that the policy gives explicit recognition to the implications of climate change and sea level rise, and the need for necessary adaptation, but not only defending the 'static' situation.</p>

Preferred Option ENV2 – Coastal Protection Belt	
Organisation	Summary of representation(s)
Environment Agency	<p>Supports the overall principles of ENV2, but would suggest that the policy gives explicit recognition to the implications of climate change and sea level rise, and the need for necessary adaptation, but not only defending the 'static' situation.</p>

Preferred Option ENV3 – Flood Risk	
Organisation	Summary of representation(s)
Environment Agency	<p>Would like to see "We will continue to work with the EA manage flood risk in a sustainable manner through capitalising on opportunities to make space for water wherever possible and through the continued provision of flood defences where necessary." Added.</p> <p>State that this is a key message coming out of the</p>

	<p>Thames Estuary 2100 Project group and, while Rochford District does not fall within the study boundary, including this in our policy would ensure consistency throughout the Thames Gateway area.</p> <p>Wish to see addition of reference for need for applications with Flood Zone to be accompanied by a flood risk assessment.</p>
--	---

Preferred Option ENV4 – Sustainable Drainage Systems (SUDS)	
Organisation	Summary of representation(s)
GO East	Large scale development is not defined
Rayleigh Town Council	SUDS relies on the Environment Agency to maintain watercourses and ditches in a suitable manner (which the Town Council state is presently lacking) without this there will undoubtedly be future problems. This section needs to be far more robust
Environment Agency	Agrees with the aims of ENV4 and believes that SUDs provide some positive ways to increase biodiversity.

Preferred Option ENV5 – Air Quality Management Areas	
Organisation	Summary of representation(s)
Castle Point Borough Council	Support the protection and improvement of air quality; however the preferred option should clarify the measures that will be taken to improve air quality.

Preferred Option ENV6 – Large Scale Renewable Energy	
Organisation	Summary of representation(s)
East of England Regional Assembly (EERA)	It is suggested that this policy should state what schemes the Council would be willing to support.
Natural England	<p>Recommends that the Council refers to the Essex Landscape Character Assessment when when considering locations for renewable energy installations.</p> <p>Notes that an appropriate balance needs to be struck between site protection and the promotion of renewable and low-carbon energy generation projects. To achieve this, a fuller criteria-based policy should be included in the Development Control Policies Development Plan Document.</p>

Preferred Option ENV7 – Small Scale Renewable Energy Projects	
Organisation	Summary of representation(s)
GO East	Council need to ensure that this wholly accords with the PPS1 Supplement on Climate Change. At present the wording appears to suggest a greater level of restraint than that intended by national policy
East of England Regional Assembly (EERA)	Although this standpoint is welcomed difficulties may arise in measuring the effectiveness of small scale schemes and relating this back to regional and national targets. EERA will be looking for the relevant Development Control documents to show how targets

	will be met.
Natural England	Support of small scale energy projects as part of sustainable design and construction.

Preferred Option ENV8 – Code for Sustainable Homes

Organisation	Summary of representation(s)
East of England Regional Assembly (EERA)	Suggest a timescale for the implementation of these standards is set out.
Environment Agency	General support this approach as it is consistent with the approach they take in Norfolk, Suffolk and Essex. Ask that the Council, however, consider revising the approach so that it is line with government objectives, noting that this option proposes higher standards. The Council will need to be sure such standards are deliverable.
Castle Point Borough Council	CPBC has been advised by developers that Code level 3 is achievable however Level 4 and beyond significantly impacts on the economic viability of the development. The requirement for meeting level 6 by 2013 should be tested at a local level to ensure that it is viable.

Alternative Option ENV8 – Code for Sustainable Homes

Organisation	Summary of representation(s)
GO East	The evidence base needs to demonstrate why this requirement should be introduced
Environment Agency	Generally support this approach as it is consistent with the approach that is taken in other local authority areas in Norfolk, Suffolk and Essex. Support the idea of a stepped approach but ask the Council to consider revising this in line with central Government objectives as set out in "Building a Greener Future: Towards Zero Carbon Development". The proposed standards are higher than those suggested by Government so the Council will need to be certain that they are achievable within the time frame.

Preferred Option ENV9 – BREEAM

Organisation	Summary of representation(s)
GO East	The evidence base needs to demonstrate why this requirement should be introduced
East of England Regional Assembly (EERA)	Suggest a timescale for the implementation of these standards is set out.
Essex County Council	Object to the Council not intending to implement the 'Merton Rule', stating that the BREEAM rating does not include provision of renewable energy generation for new buildings. Suggest the policy should be expanded to incorporate the 'Merton' rule that at least 10% of energy estimated to be used by new development will be required to be produced by on-site renewable energy generation. This would also be consistent with

	the Urban Place Supplement.
Environment Agency	Support this approach.

Contaminated Land	
Organisation	Summary of representation(s)
GO East	Question where the contaminated land within the District is to be found

Preferred Option ENV10 – Contaminated Land	
Organisation	Summary of representation(s)
Environment Agency	Support this option as it is consistent with national policy.

Summary of National, Regional and Local Government Comments on the Transport Chapter

Transport Introduction	
Organisation	Summary of representation(s)
East of England Regional Assembly (EERA)	Suggest that opportunities to facilitate home-working within new development proposals should not be ignored, in the interests of reducing the need to travel by car.
Essex County Council	State that the transport aspects of the Core Strategy are well rounded and make good reference to the transportation aspirations of the County.
Hawkwell Parish Council	Proposed residential development will lead to congestion on all routes to and from Hawkwell. Options in this section lack real substance and question what guarantee there can be that private companies will continue to provide public transport.

Preferred Option T1 – Highways	
Organisation	Summary of representation(s)
Castle Point Borough Council	Support reduce reliance on private car, but note that it is still essential to recognise that highway improvements may be required.
Rayleigh Town Council	Strongly support this preferred option, question what safeguards will be put in place to ensure that s106 agreement monies are spent on infrastructure.
Rawreth Parish Council	Believe that roads and infrastructure are at full capacity. Rawreth Lane and Water Lane cannot take any more traffic. Proposed development will bring traffic to an unsustainable level.

Preferred Option T2 – Public Transport	
Organisation	Summary of representation(s)
Rayleigh Town Council	Encouraging alternatives to the car must not be used as an excuse to lower standards of parking. This section needs to be more prescriptive.

Preferred Option T5 – Cycling and Walking	
Organisation	Summary of representation(s)

Essex County Council	Suggest the addition of the following to the preferred option: <ul style="list-style-type: none"> • Cycle parking and incentives to cycle to be provided at residential developments • Specific reference to 'schools' to the list of locations to be linked by a safe and convenient network of cycle and pedestrian routes
Natural England	Support the preferred option. State that footpaths and cycleways should be provided as part of new development layouts which will contribute to sustainable transport and also provide informal recreation opportunities to help improve the health and well-being of residents.

Preferred Option T6 – Greenways

Organisation	Summary of representation(s)
Natural England	Natural England is supportive of the Thames Gateway Green Grid Strategy and would see the provision of greenways as a contribution to a wider network of green infrastructure.

Preferred Option T7 – Parking Standards

Organisation	Summary of representation(s)
Hawkwell Parish Council	Express concern over proposed minimum parking standards, stating that the District has insufficient resources to manage the consequential bad parking that occurs with car parked over pavements.
Rayleigh Town Council	Strongly support the application of minimum parking standards.

Summary of National, Regional and Local Government Comments on the Retail and Town Centres Chapter

Preferred Option RTC1 - Retail	
Organisation	Summary of representation(s)
GO East	Question the amount of floorspace being directed to the stated locations

Town Centres	
Organisation	Summary of representation(s)
Essex County Council	<p>Support the varied approach being taken to the development of Rayleigh, Rochford and Hockley town centres.</p> <p>Suggest that the Core Strategy expresses mix of uses and projected economic impact in a more qualitative fashion.</p> <p>Recommend that the role and importance of non retail uses within town centres is recognised.</p>

Preferred Option RTC5 – Hockley Town Centre	
Organisation	Summary of representation(s)
Hawkwell Parish Council	The Hockley and Rochford Town Centre Studies have not yet been completed and the Parish Council require that these are completed and properly considered before any decisions are taken.

Summary of National, Regional and Local Government Comments on the Character of Place Chapter

Character of Place Introduction	
Organisation	Summary of representation(s)
Rochford Parish Council	Whilst agreeing it is desirable to keep the traditional buildings, where possible the public would wish to see any new build in keeping and fitting in with the character of the surrounding areas.

Preferred Option CP1 – Design	
Organisation	Summary of representation(s)
Essex County Council	Suggest the text be amended to read, 'Developers of large residential schemes should adhere to design briefs produced in conjunction with, and approved by, the district council.'
Natural England	Support this option. Glad to note that Village Design Statements have been included in the policy wording as this is an initiative which Natural England actively promotes. Suggest that opportunities be sought to promote accessible greenspace provision.

Local Lists	
Organisation	Summary of representation(s)
Hawkwell Parish Council	Welcome the re-introduction of the local list

Summary of National, Regional and Local Government Comments on the Community Infrastructure, Leisure and Tourism Chapter

Community Infrastructure, Leisure and Tourism Introduction	
Organisation	Summary of representation(s)
Rochford Parish Council	There needs to be assurances that infrastructure will be provided at the outset of any new scheme.
Ashingdon Parish Council	Agree that additional infrastructure must be provided to support the new residents and prevent existing residents suffering from stretched and weakened services; roads, schools, sewerage, health facilities, etc.

Preferred Option CLT1 – Planning Obligations and Standard Charges	
Organisation	Summary of representation(s)
Environment Agency	Suggest that developers contribute towards flood defences where appropriate.
Natural England	Suggest that countryside recreation projects including the management and maintenance of greenspace, wildlife sites and environmental improvements should be included in the list of activities that planning obligations and charges could contribute to

Castle Point Borough Council	The use of standard charges is consistent with circular 5/05 planning obligations. Standard charges provide greater certainty for developers. Developer contributions should however be the subject of negotiation as there may be economic viability reasons why the value of a development may not be able to support the standard charge.
Rayleigh Town Council	It is unrealistic to expect the shortfall in infrastructure funding be made up by standard charges (around £300,000 per dwelling across the district). It is therefore essential to state that these plans are unsustainable without considerable government funding.

Alternative Option CLT1 – Planning Obligations and Standard Charges

Organisation	Summary of representation(s)
Ashingdon Parish Council	Support the Council in demanding infrastructure improvements to accompany new developments. Believe that, whenever possible, developers must be required to pay for these improvements to the existing infrastructure. Stress that we must work together to pressurise government authorities responsible for infrastructure (roads, schools, sewerage, health, etc.) to agree that additional provision is required; and to ensure that these agreed improvements are actually made.

Education

Organisation	Summary of representation(s)
Essex County Council	The final paragraph of the commentary in the Education section, which refers to school transport plans, should be expanded to note that housing developments in excess of two miles from sufficient key stage one provision via a safe walking route or three miles from provision for older children must mitigate their impacts and facilitate appropriate school transport. The commentary in the Education section should include reference to Early Years and Childcare (EY & C) provision. Make three points: <ul style="list-style-type: none"> • New primary schools should include commensurate EY&C facilities • Although Hockley does not require a new primary school EY&C provision must be expanded • The more rural areas, in particular Canewdon, Great Wakering and Hullbridge, will require additional EY&C places

Preferred Option CLT2 – Primary Education, Early Years and Childcare

Facilities	
Organisation	Summary of representation(s)
Rawreth Parish Council	Object, noting that surpluses of Primary School Places are projected in areas of Rayleigh. Suggest that development is spread around Rayleigh in smaller sites so as to avoid closure of existing schools and prevent unnecessary provision of a new school.

Preferred Option CLT4 – Healthcare	
Organisation	Summary of representation(s)
Castle Point Borough Council	Support the requirement for new developments to be accompanied by a Health Impact Assessment (HIA). Suggest that a threshold should be considered. The preferred option currently requires all developments to have an assessment. The Local Area Agreement for Essex suggested a threshold of 50 dwelling units. They have used this as a starting point for developing a HIA policy in their emerging Core Strategy.

Alternative Option CLT4 – Healthcare	
Organisation	Summary of representation(s)
Rayleigh Town Council	<p>Suggest that a better alternative to the primary care centre located in the preferred area is the provision of an outreach outpatient centre associated with Southend Hospital to perform routine blood tests, x-rays and a minor injuries clinic etc. reducing the need to travel and relieving the pressure on hospital services while leaving GP provision where it is at present.</p> <p>New proposed residential areas are too far away from eastern areas of Rayleigh .The location of healthcare facilities should be as near to the town centre as possible.</p>

Preferred Option CLT5 – Open Space	
Organisation	Summary of representation(s)
GO East	Document should state the standards to be applied.
Rayleigh Town Council	Needs to be more specific and robust, in particular in forming a barrier between any new development and the A1245, preventing further westward sprawl in future years.
Sport England	Support with modifications - reference to background documents such as the emerging Playing Pitch Strategy would be helpful, as would be a cross-reference to Preferred Option CLT10 (Playing Pitches).

Preferred Option CLT6 – Community Facilities	
Organisation	Summary of representation(s)
Rayleigh Town Council	Strongly support this option.

Preferred Option CLT7 – Play Space	
Organisation	Summary of representation(s)
GO East	Document should state the standards to be applied

Preferred Option CLT8 – Youth facilities	
Organisation	Summary of representation(s)
GO East	Document should state the standards to be applied

Preferred Option CLT9 – Leisure Facilities	
Organisation	Summary of representation(s)
Rayleigh Town Council	<p>Considered an opportunity exists to obtain developer contributions to expand leisure facilities with the provision of a swimming pool at Rayleigh Leisure Centre</p> <p>Suggest that this is included in CLT9</p>
Sport England	<p>Agrees with the board content, but reference to PPG17 should be made in the Core Strategy. Believes that the Essex Sports Facilities Strategy (2008) should be used to inform the preparation of the Core Strategy in terms of planning for the provision of community sports facilities. Moreover, reference to Sport England's document 'Active Design' would be useful to encourage clearer thinking about the role of good urban design in promoting physical activity.</p> <p>Would advise that a number of other Core Strategies have been considered to be unsound due to the lack of a credible evidence base.</p>

Preferred Option CLT10 – Playing Pitches	
Organisation	Summary of representation(s)
Essex County Council	Suggest that this should be revised to clarify that it only applies to public rather than private pitches. Application of the policy to school playing pitches would restrict implementation of long term site management plans and school reorganisation.
Sport England	Support the overall principle of CLT10, but reference to PPG17 should be made in the Core Strategy. Reference to Sport England guidance is helpful, as is the commitment to produce a SPD on playing pitch provision. It is assumed that this document will set out local standards for their provision.

Preferred Option CLT11 – Tourism	
Organisation	Summary of representation(s)
Natural England	Supports the preferred option particularly the proviso that green tourism projects should not adversely impact on character of place or biodiversity. We would reiterate our previous comments that it should be mentioned in the policy wording that this approach is consistent with the objectives of the Thames Gateway South Essex Greengrid. Suggest text notes that the conversion of rural buildings could involve damage to

	protected species such as barn owls.
--	--------------------------------------

Summary of National, Regional and Local Government Comments on the Upper Roach Valley and Wallasea Island Chapter

Preferred Option URV1 – Upper Roach Valley	
Organisation	Summary of representation(s)
Environment Agency	Generally support this preferred option. Suggest inclusion of "Opportunities to reduce flood risk and enhance natural habitats by making space for water will be indentified." This will show consistency with their message for other Thames Gateway areas.
Rochford Parish Council	Vital that Green areas, some under Green Belt and some under recreational land, are retained where possible. If this is reduced too much the health of the new and existing population will start to suffer. Support the Upper Roach Valley and Wallasea Island schemes - for those who are able to travel to and take advantage of these areas. They will aid the conservation of the wildlife habitats for all to benefit by.

Preferred Option URV2 – Wallasea Island	
Organisation	Summary of representation(s)
Environment Agency	Support this preferred option.

Summary of National, Regional and Local Government Comments on the Implementation, Monitoring and Delivery Chapter

Implementation, Monitoring and Delivery	
Organisation	Summary of representation(s)
Essex County Council	<p>Support the inclusion of a section covering this topic.</p> <p>The tabulation of Implementation, Delivery and Monitoring matters in the final version should be expanded. In particular, the implementation and delivery material should provide a fuller description of schemes and projects, who will deliver them, funding requirements and/or sources, their priority and required timing, links with other projects and strategies, risk of non-achievement and contingency importance.</p> <p>Question whether proposed method of monitoring good design will be successful and suggest that reference to early years and childcare be made in relation to the monitoring of preferred option CLT2.</p>

Summary of NGO Comments on the Introduction

Introduction	
Organisation	Summary of representation(s)
Hockley Parish Plan Group	Suggest that the Council introduce additional control on crime/ vandalism/ anti-social behaviour in Hockley in order to deal with increasing population.
Natural England	<p>Natural England is pleased to see Essex Landscape Character Assessment (2003) and the Local Wildlife Site Review (2007) were included in the Evidence Base.</p> <p>Natural England reminds the Council that the Core Strategy will require assessment against the Habitats Regulations. Overall growth targets, London Southend airport and development in or surrounding the coastal areas will need to be scrutinised.</p>

Summary of NGO Comments on the Housing Chapter

Housing Introduction	
Organisation	Summary of representation(s)
SE Essex Organic Gardeners	Suggest that more allotments and community gardens are needed. Under existing legislation, there is a duty on local authorities to provide sufficient numbers of allotments, if an allotment authority is of the opinion that there is a demand for allotments in the area.

Housing Distribution	
Organisation	Summary of representation(s)
Hockley Parish Plan Group	Suggests an alternative option of placing all 3500 homes in one new location with self supporting infrastructure.
SE Essex Organic Gardeners	<p>Suggests that the impact on Hockley village will include:</p> <ul style="list-style-type: none"> • Traffic congestion on main routes • Parking problems • Demand on health care service • Demand on school places • Demand on public transport
CPREssex	Believes that only 30% Brownfield sites for further housing developments is too low. Brownfield should be utilised where possible. A 70% use of green belt land is unacceptable.
Essex Chambers of Commerce	Urges the Council to improve the strategic highway network, especially the east-west route.
Renaissance Southend	<p>Suggests that the 510 dwellings proposed for Great Wakering should be considered alongside the additional 1400 dwellings proposed in Southend's Core Strategy for Shoebury in the period 2001-2021.</p> <p>Suggests the development of an AAP or SPD to provide detailed planning guidance for this growth and</p>

	recommends a joint approach to the development of these two areas.
--	--

Housing General Locations	
Organisation	Summary of representation(s)
Hockley Residents Association	Concern raised that no provision has been made for road improvements in Hockley and improvements are unlikely to be economically viable.
SE Essex Organic Gardeners	Suggest that the natural areas are under pressure. Suggest that the fields in and around Hockley West need to be kept for agricultural use.
CPREssex	Suggest that the number of additional dwelling to be built in Canewdon is too high, and should be reduced. Concern expressed regarding community and recreational facilities, public transport, employment, and road network issues in Canewdon.

Alternative Option H1 – Distribution	
Organisation	Summary of representation(s)
Hockley Residents Association	The option of placing houses in a single site should be considered. Locating industry and housing separately contravenes government policy PPG4. The Seaside/Colonnade proposal for housing should be included as an alternative option.

Preferred Option H2 – General Locations and Phasing	
Organisation	Summary of representation(s)
Hockley Parish Plan Group	Suggests that extra budget will be needed to provide extra community service for the additional population in Hockley. Improvement in health service will be needed to support the additional population in the area. Concern expressed regarding traffic congestion and car parking issues in Hockley and the surrounding area.
Hockley Residents Association	Object to development along Rectory Road, Hawkwell. The combined impact on Hockley is not considered (e.g. traffic, urbanisation).
Hawkwell Athletic FC	Suggests that the infrastructure will need to be improved before building any more houses.
Rayleigh boys Youth Football club	Strongly objects to the plan for building more homes in an already too densely populated area of Rayleigh. Requests improvements in the road network and public amenities before any more houses are built in Rayleigh. Green belt land should only be used for amenities for the people of Rayleigh.
Hawkwell Action Group	Strongly object to additional housing in Hawkwell for

	<p>the following reasons:</p> <ul style="list-style-type: none"> • Infrastructure cannot cope • Identity will be lost • Poor public transport • Wildlife and greenfield will be lost.
Hawkwell Residents Association	<p>Object to the proposed development of 300+ houses in the village/Parish on the following basis:</p> <ul style="list-style-type: none"> • Lost of Greenbelt - unfair allocation of homes throughout the district especially in the Hawkwell area • Concern expressed that all of the 330 houses could be centred in one place changing the nature of the village • The B1013 cannot cope with extra traffic from what will be a developing airport facility (not considered as part of this strategy) • Extra demands on schools, dentists and doctor surgeries • Lack of public transport. <p>Feel that the Council fails to look at the district as a whole in the Core Strategy and have not considered the impact of the JAAP and site allocation development on Hawkwell.</p> <p>Additional homes should be built as a new village with self-contained services in the west of Rochford from a new access road to the A1245 (old A130).</p> <p>If the proposals go ahead with current housing and employment allocation, and an inevitable increase in airport traffic, Hawkwell Residents Association would like to see improvements and upgrades to all infrastructure; community and public services, public transport, recreation and leisure facilities etc. in place before the commencement of any new development.</p> <p>Suggests that the method of consultation is unfair - a heavy weight document preventing printing and general distribution.</p> <p>Suggests that the stated government policy of 60% brownfield first before greenfield seems to have been reversed.</p>

Alternative Option H2 – General Locations and Phasing	
Organisation	Summary of representation(s)
Hockley Residents Association	<p>Suggests that there should be an option of focusing development in a few locations.</p> <p>The Seaside/Colonnade proposal for housing should be included as an alternative option.</p>

Housing – General Locations Post 2021	
Organisation	Summary of representation(s)
Hockley Residents Association	Option of focusing development in a few locations should be given. The Seaside/Colonnade proposal for housing should be included as an alternative option.

Preferred Option H3 – General Locations Post 2021	
Organisation	Summary of representation(s)
Hockley Residents Association	Suggests that no costing information is provided, plus Ashingdon Road will not be able to cope with the extra traffic created by the additional population.

Preferred Option H4 – Affordable Housing	
Organisation	Summary of representation(s)
Shelter	<p>Recommends a higher percentage (40%) of affordable housing should be applied and housing requirements should be set for development of less than 15 dwellings (3 or more recommended).</p> <p>Suggests that the Council should state the government's target (approximately 65% of affordable housing should be social rented housing) in preferred option H4.</p>

Alternative Option H4 – Affordable Housing	
Organisation	Summary of representation(s)
CPREsex	Fully support the need for Affordable Houses in the Rochford Area.

Preferred Option H5 – Dwelling Types	
Organisation	Summary of representation(s)
Shelter	Welcomes the proposal in both H4 and H5, however, suggests that the proportion of affordable housing provision within developments should be required in the form of four bedroom dwellings as well as three.

H Appendix 1	
Organisation	Summary of representation(s)
Hockley Residents Association	Suggests that there are no details given on the viability of providing sufficient infrastructure in the proposal (e.g. traffic/road improvements, youth facilities and health centre in Rochford area).

Summary of NGO Comments on the Green Belt Chapter

Protection of Green Belt	
Organisation	Summary of representation(s)
Hockley Parish Plan Group	Suggests that the identity of Hockley as well as green belt in and around the area should be protected and preserved.
Hockley Residents Association	Supports the retention of the green belt, but the absence of infrastructure provision makes the Core Strategy unsustainable.
Renaissance Southend	Suggests that the Core Strategy should show a more explicit approach towards the green belt policy.

Preferred Option GB1 – Green Belt Protection	
Organisation	Summary of representation(s)
Hockley Parish Plan Group	Concern expressed regarding the large number of new houses to be built on green belt which could reduce open spaces between parishes and lead to coalescence between settlements, thus the loss of individual community identities.
Essex Chambers of Commerce	Suggests that sufficient flexibility needs to be allowed for within policy GB1 for the various important economic growth options of the JAAP. It is important for Rochford's planning to reflect the significant economic driver for South East Essex.
CPREssex	Concern expressed regarding the high proportion of proposed houses to be built on green belt. Brownfield sites should be the preferred option
Renaissance Southend	Suggests that policy GB1 is amended to provide for the potential amendment to the Green Belt boundary in order to realise the economic and employment potential of the airport through the Joint Area Action Plan (JAAP).

Preferred Option GB2 – Rural Diversification and Recreational Uses	
Organisation	Summary of representation(s)
Natural England	Supports GB2 as well as rural diversification within the green belt. The value of the green belt should be judged on its contribution to quality of life, nature conservation, landscape protection, flood mitigation and the impact of a changing climate.

Summary of NGO Comments on the Economic Development Chapter

Economic Development Introduction	
Organisation	Summary of representation(s)
Hockley Residents Association	Concern expressed regarding the impact caused by extra traffic on the roads (especially the B1013 and accessibility to the airport), and that the approach contravenes policy PPG4.
Federation of Small Businesses	<p>Suggests that due to the lack of sustainable road transport infrastructure in the district, there is a need to ensure that each centre of population has a concentration of suitable commercial premises to enable local employment to succeed.</p> <p>It is important to introduce commercial/mini business centres within the community, make good use of vacant and derelict land and buildings which would lead to local employment possibilities for the service based small businesses which have a vital role in the district.</p>

Preferred Option ED1 – London Southend Airport	
Organisation	Summary of representation(s)
Essex Chambers of	Supports ED1. Suggests that it must be followed by

Commerce	significant improvements to the highway infrastructure in the area to cope with the future growth.
Natural England	Concern expressed regarding the impact of the growth in the airport on air quality and on the disturbance of Natura 2000 sites. Suggests encouraging enhanced North-South links including greenways, as envisaged in the Thames Gateway South Essex Greengrid Strategy.
Renaissance Southend	Suggests that the Core Strategy should give clearer guidance on the purpose and objectives for the Joint Area Action Plan (JAAP). The Core Strategy should identifying requirements of the land allocation for the 3,000 new jobs. In addition, they suggest that Policy ED1 should be amended to make it clear that the JAAP will be looking to examine how to manage the change required to realise the employment potential of the whole area included within the JAAP boundary.

Preferred Option ED2 – Employment Growth

Organisation	Summary of representation(s)
Essex Chambers of Commerce	Supports the principle of ED2, but would examine the detail of the Area Action Plans for Hockley and Rochford.

Preferred Option ED3 – Existing Employment Land

Organisation	Summary of representation(s)
Essex Chambers of Commerce	Supports the review of existing employment land and the reallocation for housing where appropriate. It is essential to improve the highway infrastructure and access to all industrial estates to sustain employment, especially Purdeys Industrial Estate.

Preferred Option ED4 – Future Employment Allocations

Organisation	Summary of representation(s)
Essex Chambers of Commerce	Supports ED4 as it provides opportunities for better quality business premises much closer to main roads.
Federation of Small Businesses	Agrees that ED4 provides a reasonable solution for both housing allocation and the industrial estate. However, some companies may have problems relocating due to the type and size of their operation (e.g. Baltic Wharf), and there may be a need to investigate further the accessibility and road infrastructure for staff and businesses at peak times.

Summary of NGO Comments on the Environmental Issues Chapter

Environmental Issues Introduction

Organisation	Summary of representation(s)
Hockley Parish Plan Group	Suggest that there should be no additional air or noise

	pollution in Hockley caused by increased traffic volumes and the airport expansion.
Hockley Residents Association	Concern expressed that no consideration is given to pollution caused by extra traffic on the roads.

Environmental Issues - Protection and Enhancement of the Natural Landscape and Habitats

Organisation	Summary of representation(s)
Natural England	Suggests that Natural England should be involved as a stakeholder in the Crouch and Roach Estuary Management Plan.

Preferred Option ENV1 – Protection and Enhancement of the Natural Landscape and Habitats

Organisation	Summary of representation(s)
Natural England	Supports the overall aims of ENV1, but would like to see the following to be included in the policy: <ul style="list-style-type: none"> • Wildlife Networks • Designing in Wildlife • BAP Targets • Landscape Character

Preferred Option ENV2 – Coastal Protection Belt

Organisation	Summary of representation(s)
CPREssex	Supports ENV2.
Natural England	Supports the overall principles of ENV2, but would suggest that the policy gives explicit recognition to the implications of climate change and sea level rise, and the need for necessary adaptation, but not only defending the 'static' situation.

Preferred Option ENV4 – Sustainable Drainage Systems (SUDs)

Organisation	Summary of representation(s)
Natural England	Agrees with the aims of ENV4 and believes that SUDs provide some positive ways to increase biodiversity.

Preferred Option ENV6 – Large Scale Renewable Energy Projects

Organisation	Summary of representation(s)
Natural England	<p>Recommends that the Council refers to the Essex Landscape Character Assessment when considering locations for renewable energy installations.</p> <p>Notes that an appropriate balance needs to be struck between site protection and the promotion of renewable and low-carbon energy generation projects. To achieve this, a fuller criteria-based policy should be included in the DC Policies DPD.</p>
Rochford Chamber of Trade	<p>Disagrees with ENV6.</p> <p>Recommends that the following options should also be looked at and considered:</p> <ul style="list-style-type: none"> • Combined heat and power plants • District heat <p>Use of water power (e.g. underwater generators, barrage to generate Hydro Electric Power) in the River</p>

	Crouch.
--	---------

Preferred Option ENV7 – Small Scale Renewable Energy Projects	
Organisation	Summary of representation(s)
Natural England	Supports ENV7.
Rochford Chamber of Trade	<p>Recommends the following options should also be looked at and considered:</p> <ul style="list-style-type: none"> • Combined heat and power plants • District heat • Use of water power (e.g. underwater generators, barrage to generate Hydro Electric Power) in the River Crouch.

Preferred Option ENV8 – Code for Sustainable Homes	
Organisation	Summary of representation(s)
Natural England	<p>Supports ENV8 as it shares the same objectives for sustainable design and construction as them.</p> <p>Recommends that the Council looks at the project “A New Vernacular for the Countryside” which addresses broad sustainable design and construction principles for the countryside.</p>

Summary of NGO Comments on the Transport Chapter

Transport Introduction	
Organisation	Summary of representation(s)
Hockley Residents Association	<p>Concern expressed regarding the impact of thousands of extra car movements each day in the district, and thinks that it contravenes government policy PPG 4 as there is a lack of public transport in the West and North where new housing are proposed to be built.</p>

Transport – Highways	
Organisation	Summary of representation(s)
Hockley Residents Association	<p>Concern expressed that costing and funding for infrastructure improvements have not been considered, and that there are no plans to address how to cope with the extra traffic.</p> <p>Suggests that infrastructure cost must be identified before allocating sites to avoid hurdles in the future, i.e. insufficient government funding.</p>

Transport – Public Transport	
Organisation	Summary of representation(s)
Hockley Parish Plan Group	<p>Suggests that public transport must be improved in and around Hockley to support the additional population and to alleviate the impact of additional traffic volumes.</p>
Hockley Residents Association	<p>Concern expressed that the public transport service is being cut whilst the Council is advocating the use of environmentally friendly transport. No information is given on how new services will be provided.</p>

	Suggests that small, scattered housing developments do not generate sufficient additional traffic to cost justify additional bus services.
--	--

Transport – South Essex Rapid Transport (SERT)

Organisation	Summary of representation(s)
Hockley Residents Association	Suggests infrastructure improvements need to be in place before extra housing.

Transport – Cycling and Walking

Organisation	Summary of representation(s)
Hockley Parish Plan Group	Suggests that improved highways and cycle networks are essential in and around Hockley to support all the increased traffic volumes, improve road safety, and eliminate congestion.
Hockley Residents Association	Supports more cycle ways but do not believe the existing infrastructure can cope with the proposed plan. Also expresses concern regarding costing issues and land availability.

Transport – Greenways

Organisation	Summary of representation(s)
Hockley Residents Association	Suggests that development along Rectory Road will result in the coalescence of settlements with no greenway.
Renaissance Southend	Suggests that reference should be made to the Thames Gateway Parklands Vision published by CLG with particular regard to new open space opportunities for Rochford District. Is keen to explore opportunities for creating access to existing and new open/green spaces in both Southend and Rochford for the benefit of the two councils' residents and visitors. Highlights that Southend Council has proposed a new country park with potential links with land in the Rochford District. Scoping work is currently underway, looking at the opportunities for creating new space and improving linkages between built up areas and open space in both Southend and Rochford.

Preferred Option T1 – Highways

Organisation	Summary of representation(s)
Hockley Parish Plan Group	Feels that the infrastructure in the district is already stretched and cannot cope with the increased population and traffic. Concern expressed that there are no details on costing or how infrastructure will be implemented. Scattered housing developments will be difficult to generate sufficient pay from the developers to incorporate for

	<p>new infrastructure.</p> <p>Believes that unless significant highways development is introduced, congestion (especially in Hockley) will only get worse when the additional traffic caused by new housing and the airport join the road.</p> <p>There is a cut in bus services while extra services will be needed to support the additional population in the area. Suggests that the Council form an agreement with Arriva to make the Strategy viable.</p> <p>Lack of cycling networks and car parking spaces are also problems. Suggests that exits from the car parks in Spa Road are hazardous, additional and safer car parking is essential to support proposed additional traffic.</p>
Hockley Residents Association	Suggests that the B1013 is at $\frac{3}{4}$ capacities but there is no alternative for the use of private cars as the bus only runs every hour. In addition, there is no information on how B1013 will be enhanced.
Essex Chambers of Commerce	Suggests that the existing levels of congestion are unacceptable, and therefore it is important to have a further provision to cope with the extra traffic generated by the additional housing and employment, and improvements in highway infrastructure will be required for the efficient movement of goods and services, especially the east-west route linking Rochford east to the A130/A127.
Rochford Chamber of Trade	Suggests that the concept of T1 is sound, but the plan will need more than developers' contributions (S106) to be achieved.

Preferred Option T2 – Public Transport

Organisation	Summary of representation(s)
Hockley Residents Association	<p>Expressed concern that the bus services are being cut and there is no information on how new services will be provided. The lack of public transport in the district will result in increased use of private cars.</p> <p>Suggests that small, scattered housing developments do not generate sufficient additional traffic to economically justify additional bus services.</p>

Preferred Option T5 – Cycling and Walking

Organisation	Summary of representation(s)
Hockley Residents Association	Concern expressed regarding the costing and sustainability of building footpaths in the rural areas.
Sustrans	<p>Supports the principles of T5 and agrees with the proposed route shown in the key diagram.</p> <p>Is keen to work closely with the stakeholders on developing routes and convenient links between local amenities to reduce reliance on the car, particularly for short journey, and to get good layouts/ find a solution</p>

	to encourage sustainable developments at the planning stage.
Natural England	Supports T5. Footpaths and cycleways should be provided as part of new development layouts which will contribute to sustainable transport and also provide informal recreation opportunities to help improve the health and well-being of residents.
Renaissance Southend	Welcomes the aspirations and vision for Rochford District, with particular reference to the promotion of the District's green character and opportunities for creating good walking and cycling links between Southend and Rochford.

Summary of NGO Comments on the Retail and Town Centres Chapter

Retail and Town Centres – Retail	
Organisation	Summary of representation(s)
Hockley Residents Association	Suggests that the Council should consider the impact of people's changed shopping habits (e.g. increased use of supermarket, empty shops). Suggests that the Council should take into consideration that some proposed residential developments are far from the retail development locations and do not have public transport.
SE Essex Organic Gardens	Suggests that the Council should consider using the Sustainable Communities Act to provide a channel for local people to promote sustainability of their area.

Retail and Town Centres – Village and Neighbourhood Shops	
Organisation	Summary of representation(s)
SE Essex Organic Gardeners	Suggests that the Council should consider using the Sustainable Communities Act to provide a channel for local people to promote sustainability of their area.

Retail and Town Centres – Rayleigh Town Centre	
Organisation	Summary of representation(s)
Mr Edward Byford - Rayleigh Chamber of Trade	Made five suggestions for Rayleigh Town Centre: <ul style="list-style-type: none"> • keep the car parking charges reasonable • use signage to divert traffic from major roads to non local traffic routes • a large number of shops should remain as retail use • communicate with neighbouring authorities on major retail planning applications • pedestrianise part of the High Street.

Retail and Town Centres – Hockley Town Centre	
Organisation	Summary of representation(s)
Hockley Parish Plan Group	Hockley town centre development must maintain the character of Hockley, include a variety of amenities, and consider appropriate facilities for people with disabilities.

Hockley Residents Association	Suggests that the Hockley AAP will have a major impact (including housing) on Hockley, but it is not possible to comment on the combined impact of the Core Strategy and the Hockley AAP until both have been published.
-------------------------------	--

Preferred Option RTC1 – Retail	
Organisation	Summary of representation(s)
Hockley Residents Association	Suggests that the Hockley AAP will have a major impact (including housing) on Hockley, but it is not possible to comment on the combined impact of the Core Strategy and the Hockley AAP until both have been published.
Essex Chambers of Commerce	Supports RTC 1.
Federation of Small Businesses	Suggests that the three main retail centres are having a challenging time and looking at returning to small centres to adopt a similar style of small retail outlets could form a micro community and help retain the spending within the district. For instance, new residential developments should include local shops and it will benefit the local economy if more on-street drop by parking/ pedestrian walkways areas is provided.
The Theatres Trust	<p>Would expect to see other town centre uses mentioned in this section which is in accordance with PPS6 and some findings regarding the leisure offer from the Retail and Leisure Study.</p> <p>Suggests that the Council should remove any general reference to town centres from this section as policy RTC1 only refers to their retail element.</p>

Preferred Option RTC2 – Village and Neighbourhood Shops	
Organisation	Summary of representation(s)
Essex Chambers of Commerce	Supports RTC2.

Preferred Option RTC3 – Rayleigh Town Centre	
Organisation	Summary of representation(s)
Essex Chambers of Commerce	Supports RTC3.
The Theatres Trust	Suggests that no mention is made of any other shortcomings apart from those issues identified in the Retail and Leisure Study.

Retail and Town Centres – Hockley Town Centre	
Organisation	Summary of representation(s)
Rochford Chamber of Trade	<p>Will stay neutral until the Area Action Plan is published.</p> <p>Suggests that the profile of Rochford need to be raised in order to attract trades to improve the economy.</p>

Summary of NGO Comments on the Character of Place Chapter

Preferred Option CP1 – Design	
Organisation	Summary of representation(s)
Natural England	Supports CP1. Recommends that the Council should consider the use of policies to promote the delivery, long-term management and maintenance of greenspace and green linkages that meet local requirements and provide links between people and wildlife.

Summary of NGO Comments on the Community Infrastructure, Leisure and Tourism Chapter

Community Infrastructure, Leisure and Tourism – Introduction	
Organisation	Summary of representation(s)
Hockley Parish Plan Group	Suggests that the plan is not sustainable due to the insufficient infrastructure proposed in and around Hockley. Highway networks would be the major problem as roads through Hockley already suffer from heavy congestion.

Community Infrastructure, Leisure and Tourism – Education	
Organisation	Summary of representation(s)
Hockley Residents Association	Assume that the majority of additional children from surrounding areas will go to schools in Hockley, but no mention is made of the impact on schools in the area.

Community Infrastructure, Leisure and Tourism – Healthcare	
Organisation	Summary of representation(s)
Hockley Parish Plan Group	Increased population in Hockley and its neighbouring parishes must be supported by additional infrastructure (e.g. healthcare, schools, community services, and leisure facilities.).

Community Infrastructure, Leisure and Tourism – Tourism	
Organisation	Summary of representation(s)
Federation of Small Businesses	Suggests that if the ideals of the tourism initiative are implanted into the district, there will be a need to change planning policy to accept tourism development. Cheap but adequate accommodation within the newly developed countryside, and suitable hotel accommodation in the west of the district to cover the proposed new industrial area, will be needed.
Renaissance Southend	Recognises Rochford District's tourism potential and would seek to ensure that there are sustainable transport links between Southend and Rochford to realise this. Potential for such links are being explored in scoping work for the proposed 'new country park' for Southend. Supports proposals for Wallasea Island and would

	seek to improve sustainable links between Southend Borough and Wallasea Island where this is possible.
--	--

CLT Appendix 1	
Organisation	Summary of representation(s)
Hockley Residents Association	Feels that the proposal is unsustainable - no indication is given of likely levels of standard charges or how cross-parish enhancements will be paid for (as Standard Charges will be linked to specific developments).

Preferred Option CLT 1 – Planning Obligations and Standard Charges	
Organisation	Summary of representation(s)
Hockley Residents Association	No detail is given on Standard Charges. It is doubtful if the developers can fulfil their obligation in accordance with the Government's indicative figures in the current economic climate.
Essex Chambers of Commerce	Concern expressed that the Standard Charges will not be sufficient to contribute to any strategic highway improvements within Rochford District which will be needed to cope with the traffic generation resulting from the intended growth in housing and jobs.
Natural England	Suggest that countryside recreation projects should be included in the list of activities that planning obligations and charges could contribute to.
The Theatres Trust	Support CLT1 which shows an overall approach to developer contributions with appropriate references to strategic sites and clear links to the details set out in an accompanying SPD.

Preferred Option CLT2 – Primary Education, Early Years and Childcare Facilities	
Organisation	Summary of representation(s)
Hockley Parish Plan Group	There are no proposals to accommodate additional primary and secondary school places in Hockley/Hawkwell. Assuming that the majority of additional children from surrounding areas will go to Westerings School in Hockley, where the roads are very narrow and hazardous, without major improvements to the road networks, the increased cars will undoubtedly cause havoc and lead to accidents.

Preferred Option CLT4 – Healthcare	
Organisation	Summary of representation(s)
Hockley Residents Association	No improvements are recommended for the Rochford area which has the worst GP/ patient ratio in SE Essex and the most houses proposed.

Preferred Option CLT5 – Open Space	
Organisation	Summary of representation(s)
SE Essex Organic Gardeners	<p>Quoted and summarised the petition the government received last year - The provision of allotments is the responsibility of local authorities. Under existing legislation there is a duty on local authorities to provide allotments where they perceive there is a demand for them in their area.</p> <p>If an allotment authority is of the opinion that there is a demand for allotments in its area, it is required, under Section 23 of the Small Holdings and Allotments Act 1908, to provide a sufficient number of allotments and to let them to persons residing in its area who want them.</p>
Natural England	<p>Supports CLT5. Would like the policy to expand in greater detail and emphasise that all development should incorporate sufficient new greenspace in accordance with Natural England's Natural Green Space Standards of achieving natural greenspace within 300m of every home and how open spaces could be improved and enhanced and linked to green infrastructure.</p> <p>It is also recommended that opportunities should be taken to improve the biodiversity and amenity value of the greenspace areas by suitable planting with native species. Introducing footpaths or cycleways through these areas would also increase the provision of informal recreation and contribute to sustainable transport measures.</p>

Preferred Option CLT6 – Community Facilities	
Organisation	Summary of representation(s)
Hockley Residents Association	No information is given on how extra youth facilities will be paid for as 12 housing sites scattered across the district does not provide sufficient scale to pay for the facilities.

Preferred Option CLT9 – Leisure Facilities	
Organisation	Summary of representation(s)
Hockley Residents Association	No information is given on how leisure facilities will be paid for while Standard Charges from 12 housing sites scattered across the district do not provide cross-parish facilities.
The Theatres Trust	Feels that the Retail and Leisure Study should be mentioned in this section and the policy should not only

	<p>focus on sport and recreation through leisure centres.</p> <p>Suggests that arts facilities should be included in the text and within the policy and the title of this section should be amended to 'Arts and Leisure Facilities' for continuity and clarity. The policy should ensure that the Council's existing arts and leisure facilities are promoted and protected as the wording of policies determine whether or not development can take place.</p>
--	--

Preferred Option CLT10 – Playing Pitches	
Organisation	Summary of representation(s)
Hawkwell Athletic FC	<p>The Core Strategy has not identified new pitches in Hockley and does not say what is intended for the existing sites. For example, 2 mini soccer pitches can be created if the Council could flatten the ground near the skate board ramp at Clements Hall.</p> <p>With the influx of the new families, there will be more teams created in the future but the Council do not seem to be designating any extra pitches in the Hockley area. To build the mini soccer pitches at Clements Hall would help to ensure more children play sport in the local area and do not hang around the streets as they do today.</p> <p>Disappointed expressed with the Council's decision of rejecting the planning proposal last year (for toilet and changing facilities at Apex to be used by Greensward Academy) while the Preferred Option stated additional playing pitches will be considered appropriate in meeting certain circumstances.</p>

Preferred Option CLT11 – Tourism	
Organisation	Summary of representation(s)
Natural England	Supports CLT11. Suggest that it should be mentioned in the policy wording that this approach is consistent with the objectives of the Thames Gateway South Essex Greengrid. Also, the conversion of rural buildings could involve damage to protected species and this should be mentioned in the explanatory text.
The Theatres Trust	The preferred options have not include the aspiration 'the district has the potential to be the arts and cultural opportunities area for the sub-region' which is stated in the main text. Finds that the content of some relevant strategies are missing, and there is no mention of cultural facilities in any preferred options.

Summary of NGO Comments on the Upper Roach Valley and Wallasea Island Chapter

The Upper Roach Valley and Wallasea Island – Upper Roach Valley	
Organisation	Summary of representation(s)
Federation of Small Businesses	<p>Suggests that the Core Strategy does not cover the future of the Roach and its tributaries from the aspect of the existing users of the river, i.e. illegal waterside development, house boats, live a board's, waterside constructions.</p> <p>Suggest that there is a need to open up public access to the riverside.</p>
Renaissance Southend	<p>Supports the aim of creating more informal green space.</p> <p>Would seek to work closely with Rochford and other stakeholders to identify specific opportunities to achieve this.</p>

Preferred Option URV1 – Upper Roach Valley	
Organisation	Summary of representation(s)
Natural England	<p>Supports URV1 as well as the expansion of the Country Park. This provides an opportunity to link this area with the wider green infrastructure network and improve access to the countryside from surrounding areas.</p> <p>Suggests, however, that the policy is reworded from: 'minimum of interference' to 'appropriate management', as presently set out may not in fact 'permit certain flora and fauna to flourish'.</p>

Alternative Option URV1 – Upper Roach Valley	
Organisation	Summary of representation(s)
SE Essex Organic Gardeners	Object due to loss of farmland and enormous infilling of soil which they believe may be contaminated.

Preferred Option URV2 – Wallasea Island	
Organisation	Summary of representation(s)
Essex Chamber of Commerce	Suggests that significant highway and access improvements to Wallasea Island are essential to cope with both construction and visitor traffic for the RSPB project.
Natural England	Supports URV2 but would suggest the policy is reworded from: "no adverse impacts" to "provide any adverse ecological impacts are avoided, mitigated, or compensated for."
Rochford Chamber of Trade	Support the RSPB project, but they should ensure that S106 agreements are in consent to provide adequate facilities for visitors and infrastructure improvements for the site.

Summary of Public Comments on the Introduction

Characteristics, Issues and Opportunities

Concern was raised as to why we need to build in our area, and that the public should be listened to.

Vision

Concern was expressed over meeting the Council's aim.

Summary of Public Comments on the Housing Chapter

Housing Introduction

The majority of responses were objections. Concern was expressed that the document is too big making it hard to circulate and that the document should be reviewed in light of the current economic climate. Suggestion that all residents should have received a letter about the consultation and that it should have been publicised more. Suggestion that housing demand is actually lower than estimated because of the below average prices of property in Rochford compared to Essex as a whole. Concern was raised regarding the next stage in the process, further consultation opportunities, how the responses will be published, and how views will affect policies. Concern was expressed over the housing numbers and that the population out-migrate due to overdevelopment rather than as a result of housing shortages, the demographic assumption is wrong, and concern was expressed that some housing developments are inappropriate for the local population. Concern was expressed that the elderly, which are assumed to be causing population growth, are little considered in the housing strategy.

Distribution

The majority of responses were objections. Concern was raised over losing the identity of Hockley, increasing pressure on infrastructure from development, current congestion on the roads and the reduced bus service. Concern was expressed regarding development throughout the District, the increased pressure on existing infrastructure, and concern over the numbers proposed for west Rayleigh/Rawreth which has already been developed a lot and the increasing traffic congestion. Concern was raised over the spread of proposed development (small sites) which would limit planning obligations and increase pressure on infrastructure, and the suggestion of proposed housing in one new settlement. Concern was expressed regarding green belt release coupled with town cramming, and concern over the impact of town cramming already implemented, particularly in Hockley. Concern was expressed over town cramming and the use of green belt only in areas where infrastructure is sufficient.

Preferred Option H1 – Distribution

The majority of responses were objections. Suggestion that there should be no more development - the focus should be on existing residents and recognition of the need to allocate areas for development due to inadequate brownfield sites. Concern was expressed over the distribution across the settlements, coalescence between Great Wakering and Shoebury, the use of green belt in Rayleigh as opposed to brownfield sites, the identified tiers of settlements, the lack of costing provided and the financing of scattered developments. Concern was also expressed over the naming of 'North of London Road, Rayleigh', the share of development proposed in Rayleigh, the current congestion in the town centre, the use of agricultural land and the impact on congestion and roads. Suggested intensification in smaller settlements with traditional housing. Support of urban extensions and mixed developments, in

particular, development to the north of Rayleigh.

Alternative Options H1 – Distribution

Concern was expressed that development should be on brownfield sites, better services and facilities are needed now, and the road and rail networks are already congested. Concern was expressed that housing in Hawkwell should be spread throughout the village rather than in one place, and concern was expressed over the increasing pressure on infrastructure. Concern was expressed that there is no clear explanation of the 'alternative uses' in the first alternative option, the alternative options conflict, and that cramming would be more noticeable with the intensification of smaller settlements.

General Locations

Suggestion that there should be no housing in Hawkwell. Concern was raised over the distribution of development in Hawkwell, the housing numbers in Hawkwell/Ashingdon/Hockley/Rochford, and the impact on roads in Hockley, the B1013, Ashingdon Road and Lower Road. Suggestion that development is more suitable in the west/northwest of the District and that the town or parish should be stated in the tier 4 category. Concern expressed that tier 4 settlements are suffering from closed facilities such as schools because extra housing is considered unsustainable. Concern was raised over large developments in Hockley, and the loss of green belt and woodlands to the west. Concern was expressed that the document can not be read in conjunction with the JAAP, Allocations document etc. and concern that all interested parties should be consulted. Suggestion that infrastructure is key, and that the council should consult other councils etc. to resolve problems. Concern expressed that the use of brownfield sites can result in town cramming and loss of open space, concern was raised over the relationship with Southend and Chelmsford/Basildon, and concern expressed that residential development displacing employment use will result in intensification.

Preferred Option H2 – General Locations and Phasing

References to Hawkwell

The majority of responses were objections from Hawkwell residents. Concern expressed regarding infrastructure (such as local schools, doctors, leisure and recreation facilities etc.) – both the pressure on current services and facilities and future provision, and concern that no increased school provision has been proposed in Hawkwell or Hockley. Concern was raised over the impact of increased traffic and travelling times on the roads through Hawkwell such as Main Road, and congestion at the junction on Rectory Road and the railway bridge, the decreasing bus service and the impact of developing the airport. Concern was raised over the creation of a sprawling urban area from Hockley to Ashingdon, the impact on flooding, the negative impact on the local area, residents and wildlife, and the loss of the village feel. Comments state that the green belt should not be built on, Hawkwell has no railway station and more housing should be proposed for Hockley because it has better infrastructure, and concern was expressed regarding the naming of the general proposed area as South Hawkwell. It was highlighted that other brownfield sites should be considered such as Magees Nursery or the small industrial estate along Thorpe Road.

References to Hockley

Concern was raised over the lack of current infrastructure such as schools, current traffic congestion on main routes such as the Hockley Spa junction (particularly from development in the surrounding areas) and the future impact, and poor public transport. Suggestion that more schools are needed in Hockley. Concern was raised over the creation of a sprawling urban area from Hockley to Ashingdon, the loss of

green belt and agricultural land, and concern regarding crime and antisocial behaviour.
References to Hullbridge
Suggestion that more housing should be proposed in Hullbridge pre 2015 to relieve the pressure on other areas, and phasing the housing over the whole plan period rather than in one block. Concern was raised over the limited infrastructure, in particular roads, and concern regarding the coalescence of Rayleigh with Hullbridge.
References to Rayleigh/Rawreth
The majority of responses were objections from Rayleigh/Rawreth residents. Concern was raised over the traffic along the main road from Rayleigh to Hockley, the loss of agricultural land and green belt, the limited public transport, traffic congestion along Rawreth Lane, London Road and in the town centre and the increased pressure on infrastructure from development. Concern was also expressed regarding the impact on the character, landscape and topography in southwest Rayleigh. Support for development in London Road, Rayleigh, and the suggestion of development around the 'Rayleigh Park Estate'. Concern was expressed that Rayleigh has been developed a lot over the last 10 or 20 years and should not take anymore, and Hullbridge and other settlements should share some more of Rayleigh's proposed housing development. Concern was expressed over the coalescence between Rayleigh and Wickford etc, between Rayleigh and other settlements in the District and the phasing of development. Concern was raised over the names used to designate general areas, as Rayleigh and Hullbridge are within the Parish of Rawreth. Suggestion that although land 'north of London Road' and 'west of Hullbridge' are within the Rawreth Parish, they are separate from Rawreth village and so residents will consider themselves either Rayleigh or Hullbridge residents.
References to Canewdon
Concern was expressed over the lack of infrastructure and services, the impact on surrounding areas such as the Ashingdon Road, where the housing is going to be located and concerns regarding the access of lorries/HGVs etc into the village. Suggestion that development should occur south of Anchor Lane.
References to Rochford/Ashingdon
Concern was raised over the increasing pressure on roads e.g. Ashingdon Road and current infrastructure, the lack of public transport and schools, and the coalescence with surrounding settlements. Concern was expressed regarding the loss of green belt around the fringe of settlements. Support of the proposed expansion of King Edmund, a new primary school in West Rochford and youth facilities.
References to Great Wakering
Reference to the proposed multiagency centre in Great Wakering.
General Responses
Generally there was concern expressed over the current pressure on local roads throughout the District, and further pressure as a result of development, the current and increasing pressure on other infrastructure such as doctors, dentists and schools and that there was no costing for infrastructure. Concern was raised over the declining bus service, the tier of settlements, lack of mention regarding road improvements, loss of green belt, and the impact on the local population and wildlife. Concern over the current economic climate, the spread of proposed development, the lack of awareness of proposals and consultation, and the types of housing to be

built. Suggestion of putting all the new housing in a single new location and a new 'relief road'.

Alternative Options H2 – General Locations and Phasing

Suggestion that the document should consider the possibility of a Fossetts Farm/Bournes Green development, and that larger towns should take more development, for example Southend has more brownfield sites. Concern was expressed that development within smaller settlements will also harm their character, not just larger settlements, development 'North of London Road' would reduce the green belt between Rayleigh and Wickford and the landscape value and increase traffic and congestion. Concern was also raised that development in southwest Rayleigh will affect the topography, views and landscape value of the area, and it will increase pressure on infrastructure, green belt will be lost and there is poor accessibility. Suggestion that in Rayleigh, smaller developments rather than a single large development should be considered. Concern raised that all of the general alternative areas are located away from services and facilities, not just 'North Ashingdon', which is serviced by public transport, is close to schools, and the land already has housing around it. Suggestion that all development should be in one new location to the west of Rochford. Suggestion that northeast Hockley is considered inappropriate because of traffic and congestion but South Hawkwell is also inappropriate because of increased traffic on the B1013 as a result of Cherry Orchard Way etc.

General Locations Post 2021

Concern expressed that firm proposals for post 2021 should be made and that all development should be in one new location to the west of Rochford.

Preferred Option H3 – General Locations Post-2021

Concern was expressed over the impact of additional traffic from development in Canewdon e.g. along the Ashingdon Road, regarding access of lorries/HGVs etc. into the village, and the lack of infrastructure and services. Concern was expressed over providing infrastructure alongside housing developments, particularly in the current economic climate and concern that 'South Hawkwell' is too vague. Suggestion that development prior to 2021 should take place south of Anchor Lane, Canewdon,

Alternative Options H3 – General Locations Post-2021

Concern was expressed as to how this is an alternative option.

Affordable Housing

Concern was raised over the viability of affordable housing in the current economic climate and given that property values are considered high. Suggestion that there should be more affordable housing and concern expressed over the current shortage.

Preferred Option H4 – Affordable Housing

Concern was raised that there should be minimal development in Hockley, but development should include affordable housing. Concern expressed that the right balance between affordable housing and large developments is needed, housing should be in-keeping with the current character, it should not be situated in a single location and should be mixed into developments with intermediate, key worker and market housing. Suggestion that Section 106 agreements should be used to provide infrastructure improvements. Concern was raised over the realistic affordability of affordable housing and their viability in the context of the current economic climate.

Concern was expressed that affordable housing should be required within fewer than 15 units, and that the policy does not ensure provision for the government's target figure of 65% socially rented housing.

Dwelling Types

Concern was expressed that affordable housing should be for local people. Concern was also raised over the character, scale and density of new developments.

Preferred Option H5 – Dwelling Types

Concern was expressed over the concentration and character of dwellings, the use of planning contributions, and the development of houses as opposed to flats.

Preferred Option H6 – Lifetime Homes

Lifetime Homes is supported.

Gypsy and Traveller Accommodation

Concern expressed over the designation of sites particularly illegal sites, and concern over the management of sites and other issues.

Preferred Option H7 – Gypsy and Traveller Accommodation

Mostly objections. Concern was expressed over the designation of illegal sites which are inappropriately located and the large number of sites proposed.

Alternative Options H7 – Gypsy and Traveller Accommodation

Concern was expressed over the provision of sites.

H Appendix 1

Mostly objections. Concern was expressed regarding drainage and flooding particularly in Rayleigh and the lack of reference to improving roads in Rayleigh. Concern was raised over the use of general locations in determining infrastructure requirements and costing, the lack of healthcare provision other than in Rayleigh, lack of infrastructure for Hockley, the definition of sustainability and the provision of public open space.

Summary of Public Comments on the Green Belt Chapter

Protection of the Green Belt

Concern was raised over further development, the quality of life of residents, overpopulation and overcrowding, loss of greenbelt, the future appeal of the area, and the location of proposed development. Concern was expressed that development proposed in H2 is against this policy and PPG2, how greenbelt is redesignated and how development on the released land will be controlled.

Preferred Option GB1 – Green Belt Protection

Concern was raised regarding the retention of the identity and greenspaces of Hockley, loss of green belt with particular reference to Hockley, southwest Rayleigh, north of London Road and southwest Hullbridge, the impact on the topography, landscape value and view of southwest Rayleigh. Concern was expressed regarding the consideration of alternative sites, the impact on farmers and local agriculture, concern regarding green belt use over alternative brownfield sites in west Rayleigh, scattering of proposed development, the percentage of development proposed on greenbelt, the coalescence of settlements, the location of proposed development to existing centres, inadequate open space in southwest Rayleigh, and the impact on

congestion, wildlife, the water table and pollution. Concern was raised over the use of agricultural land, lack of proposed road improvements, the problem of congestion concentrated in one area (e.g. north of London Road), current congestion, use of other brownfield and residential sites, and concern was expressed over the appropriateness of different sites in the 'call for sites'.

Rural Diversification, Green Tourism and Recreational Uses

Concern was expressed over the development of green belt in Rayleigh.

Preferred Option GB2 – Rural Diversification and Recreational Uses

Concern was expressed regarding easy development opportunities for developers through use of the greenbelt, and reference to Lubbards Lodge Farm, where the policy would provide an opportunity to sustainably redevelop some of the existing buildings.

Alternative Options GB2 – Rural Diversification and Recreational Uses

Agreement with the objections to the alternative option.

Summary of Public Comments on the Economic Development Chapter

Introduction

Concern was expressed regarding proposed development in the north whereas the airport development is in the southeast, the closure of Rochford Hospital, and the development of jobs at the airport.

London Southend Airport and Environs

Concern was raised over increased pollution and traffic in Hockley, the long term and short term impact of airport development and road and other infrastructure improvements.

Preferred Option ED1 – London Southend Airport

Concern was raised regarding developing the airport to its full potential, concern over the use of green belt, and the general impact of airport development such as pollution and congestion.

Employment Growth

Concern was expressed regarding empty factories.

Preferred Option ED2 – Employment Growth

Concern was expressed over attracting more employment opportunities to the area, the demand for employment sites and the relocation of Rawreth Industrial Estate.

Preferred Option ED3 – Existing Employment Land

Concern was raised over the relocation of Rawreth Industrial Estate.

Preferred Option ED4 – Future Employment Allocations

Majority object. Concern was raised over the proposed relocation of Rawreth Industrial Estate, the loss of green belt, and the visual impact. Alternative locations are suggested.

Summary of Public Comments on the Environmental Issues Chapter

Introduction

Concern over pollution, traffic congestion, the reduced bus service, and the impact on wildlife.

Protection and Enhancement of the Natural Landscape and Habitats

Concern was raised over the biodiversity of brownfield sites and the omission of gardens from the policy.

Preferred Option ENV1 – Protection and Enhancement of the Natural Landscape and Habitats

Majority support. Concern was expressed regarding the inclusion of greenspace in developments and no mention of 'protection' in the policy.

Local Wildlife Sites (LoWSs)

Concern was expressed regarding biodiversity of land in southwest Rayleigh, land at Shoebury Ranges, and concern over the absence of local nature reserves.

Sites of Special Scientific Interest (SSSIs)

Concern was expressed regarding the value of SSSIs and no mention of natural habitats.

Crouch and Roach

Concern was raised over mitigating the impact of uses.

Special Protection Areas (SPAs)

The policy is supported.

Special Areas of Conservation (SACs)

The policy is supported.

Preferred Option ENV2 – Coastal Protection Belt

Majority support. Concern was raised over the implementation and enforcement of the policy.

Flood Risk

Concern was raised over flooding and drainage.

Preferred Option ENV3 – Flood Risk

Concern was expressed regarding the flooding of Rawreth Lane and land referred to as 'North of London Road', and directing development away from medium/high flood risk areas is supported.

Preferred Option ENV4 – Sustainable Drainage Systems (SUDS)

Concern was expressed over the flooding of land to the 'North of London Road'.

Air Quality Management Areas

Concern was expressed over the impact of Southend airport development and the decreasing bus service on air quality.

Preferred Option ENV5 – Air Quality

Concern was expressed over the impact of Southend airport development on air quality.

Renewable Energy

Concern was expressed over energy consumption, wind turbines and the efficiency of housing.

Preferred Option ENV6 – Large Scale Renewable Energy Projects

Concern was expressed over large scale projects and whether the policy applies to waste incinerators and their associated impacts.

Preferred Option ENV7 – Small Scale Renewable Energy Projects

General support of small scale projects.

Preferred Option ENV8 – Code for Sustainable Homes

Suggestion that a higher standard should be required.

Preferred Option ENV9 – BREEAM

Suggestion that all public buildings should achieve a minimum rating of 'excellent'.

Preferred Option ENV10 – Contaminated Land

Concern was expressed regarding contaminated sites at Rawreth Industrial Estate.

Summary of Public Comments on the Transport Chapter**Introduction**

Concern was expressed over the increase in traffic and congestion throughout the District, the impact of decreased public transport and car parking issues. Concern was raised regarding airport development and lack of reference to lorries and vans in the policy. Concern was expressed over the general impact on infrastructure of development and concern over the lack of costing and identified funding for infrastructure improvements/additions.

Highways

Concern was expressed over infrastructure improvements, particularly in Hockley.

Preferred Option T1 – Highways

Concern was expressed over implementing highways improvements before development, the lack of proposed road improvements to Hawkwell/Hockley, the impact of further development on roads and green belt. Concern was raised regarding the declining public transport service, impact of increased traffic in Rayleigh and safety concerns particularly around schools (Rayleigh Primary). Support for improving east to west connections and Baltic Wharf access road. Suggestion that it conflicts with H2.

Public Transport

Concern was expressed over the declining public transport service, pollution, and the location of proposed sites away from railway stations. Suggestion of a park and ride scheme and local bus services into Hockley town centre from outlying housing estates.

Preferred Option T2 – Public Transport

Concern was expressed over the declining public transport service throughout the District, the location of housing on or near public transport routes and lack of

emphasis on improving the railway service. Suggestion that improved highways and cycle networks particularly in Hockley are needed and suggestion that it conflicts with H2.

Preferred Option T3 – South Essex Rapid Transport (SERT)

One support for the scheme.

Preferred Option T4 – Travel Plans

Concern was expressed over the development of the airport.

Cycling and Walking

Concern was raised over the costing of cycle and footpaths.

Preferred Option T5 – Cycling and Walking

Concern was expressed over the costing, detail and implementation of the cycle and footpaths. Particular concern was raised with regards to Watery Lane and Rawreth Lane.

Greenways

Suggestion that the sustrans route should be open to all users, not just cyclists.

Preferred Option T6 – Greenways

Concern was expressed over road safety in some areas such as Barling Road, lack of proposed parking facilities, the bus service, the use of the greenway by pedestrians, cyclists and horses and the safety implications of this.

Parking Standards

Concern was expressed over applying minimum requirements and parking in Hockley.

Preferred Option T7 – Parking Standards

Concern was raised over parking charges, people using out of town shopping centres and the implementation of off street parking for all developments.

Summary of Public Comments on the Retail and Town Centres Chapter

Retail

Concern was expressed regarding the location of proposed sites away from town centres, loss of character, Hockley town centre regeneration and empty shops. Suggestion that leakage out of the District cannot be changed – Hockley and Hawkwell for example serve day-to-day needs.

Preferred Option RTC1 – Retail

Suggestion that town centres should be renovated rather than increased and suggestion that big stores should be resisted.

Preferred Option RTC2 – Village and Neighbourhood Shops

Local shops are a vital asset to the disabled and elderly.

Preferred Option RTC3 – Rayleigh Town Centre

The policy is supported.

Alternative Options RTC3 – Rayleigh Town Centre
--

Suggestion of development along Websters Way, Rayleigh.

Preferred Option RTC4 – Rochford Town Centre

Suggestion that Rochford town centre should be renovated rather than increased.

Hockley Town Centre

Concern was expressed over increasing rents, loss of shops, too many restaurants/takeaways, lack of supermarket competition and concern over the impact of the Town Centre Masterplan.
--

Preferred Option RTC5 – Hockley Town Centre
--

Concern expressed regarding the retention of Hockley's character. Suggested development of shops, parking and youth facilities etc. in the town centre, but concern that Eldon Way should not provide additional retail opportunities.
--

Summary of Public Comments on the Character of Place Chapter

Introduction

Concern was raised over the character of Hockley.

Design

Concern was expressed over the erosion of character.
--

Preferred Option CP1 – Design

Concern was expressed regarding the lack of high standard of architectural quality throughout the District and concern that new developments should respect local character.
--

Preferred Option CP2 – Conservation Areas
--

Concern was expressed regarding the access of lorries/HGVs etc into the village and conservation area of Canewdon.
--

Local Lists

Concern was expressed regarding the previous abolition of the Local List and the impact on loss of heritage buildings, particularly in Hockley.

Preferred Option CP3 – Local List
--

Support for the policy and raising awareness of locally important buildings.
--

Summary of Public Comments on the Community Infrastructure, Leisure and Tourism Chapter

Introduction

Concern was raised regarding increasing infrastructure that will be needed with development such as healthcare particularly in Hockley/Rochford/ Rayleigh, a swimming pool in Rayleigh, and more local post offices.

Planning Obligations and the Standard Charges

Concern was expressed over the costing and delivery of infrastructure.

Preferred Option CLT1 – Planning Obligations and Standard Charges

Concern over the lack of detail regarding the acquisition and distribution of standard charges.

Education

Concern was expressed regarding increased class sizes in schools and parking outside schools particularly in Hockley, and the impact of the reduced bus service.

Preferred Option CLT2 – Primary Education, Early Years and Childcare Facilities

Concern was raised over appropriate future school provision in Rayleigh, and the design of new primary schools.

Preferred Option CLT3 – Secondary Education

Agreement with the proposed expansion of King Edmund School.

Healthcare

Concern was raised over limited healthcare and lack of additional provision in Hockley/Rochford and provision for the over 60's.

Preferred Option CLT4 – Healthcare

Concern was expressed regarding current healthcare provision in Hockley, the decreased bus service to Southend hospital, the impact on health from development and general accessibility to healthcare for all the population. Concern was raised with particular regard to a peripheral healthcare centre alongside development to the 'North of London Road'.

Preferred Option CLT5 – Open Space

Concern was expressed that provision should not result in a loss of green belt or increased development in west Rayleigh/ Rawreth.

Community Facilities

Concern was expressed over lack of detail regarding provision and funding, and the use of standard charges.

Play Space

Concern was expressed over the playgrounds in Great Wakering which are often closed.

Preferred Option CLT7 – Play Space

Majority support. Suggestion that gardens are essential and with communal play space as proposed, children would need to be escorted.

Youth Facilities

Concern was raised regarding the feasibility of provision considering the proposed 'scattered development' and emphasis on provision for youths.
--

Preferred Option CLT9 – Leisure Facilities

Concern was expressed over the current demand for leisure facilities and the need for additional facilities such as swimming pools and concern over the external appearance of Rayleigh Leisure Centre.

Summary of Public Comments on the Upper Roach Valley and Wallasea Island Chapter

Preferred Option URV1 – Upper Roach Valley

Support for the policy. Comment on extending the Country Park up to the boundary of the B1013 and support for linking the Park to Hockley Woods.
--

Alternative Options URV1 – Upper Roach Valley
--

Suggestion that the area must be open and accessible to everyone.

Policy - Preferred Option URV2 – Wallasea Island

Objections to increasing the recreational opportunities on Wallasea Island and some support of the policy. Suggestion that the project has the potential for green tourism and agreement over providing recreational facilities.
--

Alternative Options URV2 – Wallasea Island

Support for the policy – the RSPB will provide appropriate recreational opportunities on Wallasea Island.

Summary of Agents comments on the Introduction

Introduction	
Agent	Summary of representation(s)
Charles Planning Associates Ltd (representing Swan Hill Homes Ltd)	In general terms the Core Strategy is overly prescriptive and detailed, dealing with too many issues and providing too many policies that could be and should be dealt with in other Development Plan Documents
RW Land & Planning (representing J F Spencer & Son Ltd)	Welcome the importance the Council place on the close links between the Sustainable Community Strategy and the Core Strategy including ensuring accessibility to services.
Croudace Strategic Ltd	The time horizon of the Core Strategy should be at least 15 years from the date of adoption.
Edward Gittins & Associates (representing Crowstone Properties Ltd)	<p>Found the summary of public opinion in "Listening To Your Views" both interesting and valuable as a basis for formulating the Core Strategy.</p> <p>Suggests asking the question regarding the development of green belt phrased: "should we safeguard the Green Belt rather than make provision for the various types of housing to meet the needs of our existing and future residents?" rather than "should Green Belt land be developed?" to gauge a different response.</p> <p>Suggests that housing shortages drive property prices higher due to scarcity, making it difficult for young people to get on the housing ladder.</p> <p>Welcomes the fact that after many years of assiduous protection of Green Belt land, the Council has "grasped the nettle" and has clearly identified sound reasons why it is a Preferred Option to identify some Green Belt land for development.</p> <p>Suggests there are opportunities for providing Open Space for both formal and informal recreation in association with General Locations especially on the edge or within the Green Belt particularly opportunities on the western side of Ashingdon.</p> <p>Suggest amendments throughout the Core Strategy to ensure its soundness, such as referring consistently to Rochford/Ashingdon and Hockley/Hawkwell rather than just Rochford and Hockley.</p>
Edward Gittins & Associates (representing Mr Dudley Ball)	<p>Found the summary of public opinion in "Listening To Your Views" both interesting and valuable as a basis for formulating the Core Strategy.</p> <p>Suggests asking the question regarding the development of green belt phrased: "should we safeguard the Green Belt rather than make provision for the various types of housing to meet the needs of</p>

	<p>our existing and future residents?" rather than "should Green Belt land be developed?" to gauge a different response.</p> <p>Suggests that housing shortages drive property prices higher due to scarcity, making it difficult for young people to get on the housing ladder.</p> <p>Welcomes the fact that after many years of assiduous protection of Green Belt land, the Council has "grasped the nettle" and has clearly identified sound reasons why it is a Preferred Option to identify some Green Belt land for development.</p> <p>Identified much to support within the document, but there is insufficient justification and clear testing of options against agreed criteria. It is important that the process to determine the general locations for example is clear to ensure soundness of the document.</p> <p>Suggest amendments throughout the Core Strategy to ensure its soundness, such as referring consistently to Rochford/Ashingdon and Hockley/Hawkwell rather than just Rochford and Hockley.</p>
--	--

Characteristics Issues and Opportunities	
Agent	Summary of representation(s)
RW Land & Planning (representing JF Spencer & Son Ltd)	<p>Welcome the acceptance by the Council that infilling alone will not be able to provide the housing numbers necessary and that this would have an adverse effect on the character of the towns. It is surely more sustainable to concentrate additional housing on greenfield sites which benefit from existing infrastructure and nearby services.</p> <p>Due to the high car dependency away from the three main towns, it is more sustainable that the majority of the planned housing should be in or around these towns due to the rail links.</p> <p>We welcome the four tiers of settlements and the Council's acknowledgment that Hockley is classed as a Tier One settlement containing a "local town centre catering for local need".</p> <p>Also agree that the Second tier Settlements of Hullbridge and Great Wakering have a "more limited range of services access to public transport is relatively poor".</p>
Edward Gittins & Associates (representing Crowstone Properties Ltd)	Found the "Characteristics, Issues and Opportunities" section to be a useful summary which painted an accurate picture of the current character

	and contemporary issues in Rochford District.
Edward Gittins & Associates (representing Mr Dudley Ball)	Found the "Characteristics, Issues and Opportunities" section to be a useful summary which painted an accurate picture of the current character and contemporary issues in Rochford District.

Vision	
Agent	Summary of representation(s)
Planning Potential (representing Fairview New Homes)	there are a number of aspects which are currently inconsistent or do not accurately reflect the sentiments of the Preferred Policies set out in the remainder of the draft Core Strategy. There is currently no recognition within the Council's key objectives of the most appropriate direction for development. it should be made clear as part of objective six that the Green Belt boundary is to be re-defined.
Edward Gittins & Associates (representing Crowstone Properties Ltd)	Support the overarching vision and the key planning objectives. Suggest that a fuller explanation of how the vision is to be realised and reference to the types of measures or policy and proposals that will be introduced to implement the key planning objectives should be included.
Edward Gittins & Associates (representing Mr Dudley Ball)	Support the overarching vision and the key planning objectives. Suggest that a fuller explanation of how the vision is to be realised and reference to the types of measures or policy and proposals that will be introduced to implement the key planning objectives should be included.

Summary of Agents Comments on the Housing Chapter

Housing - Introduction	
Colliers CRE (representing Aber Ltd)	Support the principle of the Core Strategy identifying the general locations for housing development but acknowledge that the precise boundaries of the sites will be determined in the Allocations Development Plan Document
Croudace Strategic Ltd	<p>The baseline for the housing land supply information should be the most recent, in this case 31st March 2007, as opposed to 2006. It is not clear why 2006/7 supply has to be estimated rather than based on completion records.</p> <p>It is noted that the minimum balance for 2006-2021 is 2,489 whereas locations for just 2,500 have been identified. This does not allow for any non-delivery or slippage, and represents an over supply of just 11 units which is not in the spirit of minimum allocations as introduced in the East of England Plan.</p>
Andrew Martin Associates Ltd (representing A W Squier Ltd)	The Council should work towards a plan life, which ends in 2026 rather than 2025, ensuring that the Core Strategy can demonstrate a fifteen year continuous supply of housing land. The housing land supply data is based on an assessment method, which is now out of date and contrary to Government advice.

Charles Planning Associates (Swan Hill Homes Ltd)	<p>Swan Hill recognises the importance of seeking to concentrate new developments mainly in the existing urban areas, on previously developed land where possible.</p> <p>Swan Hill supports the approach that green field land on the edge of settlements that are released for development should not have a significant impact on the characteristics of the Green Belt, and that densities are in line with the objectives of PPS3 and reflect the local character of the settlement to which the extension is proposed.</p>
Planning Potential (representing Fairview New Homes Ltd)	<p>care should be taken to ensure that the requirements stipulated at Paragraph 54 of PPS3 are adhered to. In particular, the deliverability of sites should be carefully considered when taking decisions on the timing of housing development, in that the site should be available, suitable and achievable, in order that the five year housing supply is realistic in its aims.</p>

Housing Distribution	
Agent	Summary of representation(s)
Colliers CRE (representing Aber Ltd)	Support the findings that over the plan period, 70% of new housing will need to be on green field sites as sustainable extensions to existing settlements.
Christopher Wickham Associates (representing Inner London Group)	Suggest that the UCS 2007 underestimated the capacity for some of the sites, e.g. Stambridge Mills and Star Lane Brickworks are both capable of accommodating substantially more development.
Iceni Projects Ltd (representing Colonnade Land LLP)	Concur that it is not realistic to expect Rochford's housing allocation to be met mainly on Brownfield sites, and support the aim of delivering 30% of development on previously developed sites.
Strutt and Parker (representing Chelmsford Diocesan Board of Finance)	Support the concern regarding the effect of "town cramming" on the attractiveness and character of parts of the District. Providing 60% of housing on previously developed land as advocated by Government Policy may be unrealistic in Rochford. A 30:70 split between development on previously developed land and suitable Greenfield locations at the edge of sustainable settlements is also supported.
Edward Gittins & Associates (representing Crowstone Properties Ltd)	<p>Considers that the remaining balance of 3,489 units for the period up to 2025 represents a substantial commitment and requires careful decisions in relation to its future distribution.</p> <p>Suggests that the Council can be justifiably proud of its record in directing a high proportion of recent growth to brownfield sites, however, the decline in this finite resource is inevitable. Agree that brownfield sites are dwindling and there is an increasing need to use greenfield sites. The 30% allocation to brownfield sites is probably realistic and hence deliverable.</p> <p>It is also important not to rely on regular reviews of the Green Belt boundary and this points to the need</p>

	<p>for long term land reserves needed for development being taken out of the Green Belt as part of the Core Strategy.</p> <p>Believe that the approach to the preferred distribution is the right one but have not seen the evidence to support this important claim.</p> <p>The distribution of housing should be considered holistically with other development needs of the district such as employment and community facilities rather than in isolation to ensure that they are closely and geographically associated and reflect a comprehensive and coherent strategy.</p>
--	---

Alternative Option H2 – General Locations and Phasing	
Agent	Summary of representation(s)
Colliers CRE (representing Aber Ltd)	The approach to sustainable development and focussing housing development in the higher tier settlements, with a proportion of the new housing in the lower tier settlements.
Croudace Strategic Ltd	Strategic sites should be clearly identified. The current programme will not allow for delivery before 2014.
Christopher Wickham Associates Ltd (representing Inner London Group)	<p>Agree with the concept of sustainable development. Factors such as the re-use of previously developed land, accessibility to services, infrastructure capacity, deliverability, the re-use of on-site materials, the removal of contamination, and the protection of the local environment are key considerations.</p> <p>Also suggests that development at Hullbridge and Canewdon would not accord with the objectives of sustainable development. New housing should be directed towards those areas with a close relationship with Southend.</p>
Strutt & Parker (representing Chelmsford Diocesan Board of Finance)	<p>Supports the balanced strategy adopted for the settlement hierarchy.</p> <p>Believes that Hawkwell is considered to be a sustainable settlement, capable of accommodating development to the south. A potential site for housing put forward during previous consultations, to the south of Ironwell Lane, Hawkwell, it is well located in terms of services, facilities and employment opportunities and has good links with Hockley.</p>
Andrew Martin Associates Ltd (representing A W Squier)	Supports the general locations identified in the Core Strategy, however they are too vague.
Kember Loudon Williams (representing Barratt Eastern Counties)	The table on page 26 which sets out the settlement tiers is supported. Rayleigh, Rochford/Ashingdon, Hockley/Hawkwell are clearly the largest settlements in the District and they benefit from good employment, housing, leisure, community and public transport provision.
Planning Potential	At present, support cannot be provided to the

(representing Fairview New Homes)	<p>Settlement hierarchy as set out on Page 26 of the draft Core Strategy Document. Whilst it is considered appropriate for Rayleigh to be designated as a Tier 1 settlement, the draft Core Strategy is currently not consistent throughout in this respect. Rayleigh should be considered the priority direction for housing development given the greater level of services available and public transport connections, in line with the designation set out on Page 20.</p> <p>Therefore, recommend on behalf of Fairview New Homes that the settlement hierarchy set out on Page 26 be amended in order to reflect the higher level order of Rayleigh.</p>
Graham Jolley Ltd (representing Mr J Hart)	<p>The Council's acceptance that some Green Belt land will need to be released and 70% of new housing is to be on greenfield sites, as sustainable extensions to existing settlements within the plan period 2001 - 2021 is supported.</p> <p>Their client is also in favour of focusing new housing development on the higher tier settlements (H2), which includes Rochford/Ashingdon, as part of the proposed balanced strategy.</p>
Iceni Projects Ltd (representing Colonnade Land LLP)	<p>Colonnade concur with the general principle of the settlement hierarchy, albeit would reaffirm its view that Rochford has the potential to stand above all other settlements due to its proximity to London Southend Airport. The Airport, along with London Gateway, is one of the two most significant employment opportunities within the Essex Thames Gateway. The Core Strategy should more specifically acknowledge this opportunity, and reflect this in its approach to all policies and objectives.</p>

Preferred Option H1 – Distribution

Agent	Summary of representation(s)
Christopher Wickham Associates (representing Inner London Group)	<p>Suggest that the UCS 2007 underestimated the capacity for some of the sites, e.g. Stambridge Mills and Star Lane Brickworks are both capable of accommodating substantially more development.</p> <p>Recommend that H1 should state that the maximum use will be made of previously developed land.</p>
Stolkin & Clements LLP (representing Firstplan)	<p>Stolkin and Clements (Southend) LLP support this policy.</p>
Charles Planning Associates (representing Swan Hill Homes)	<p>Swan Hill generally supports the approach taken by the Council in this preferred option.</p>
David Grew Ltd (representing David Grew Ltd)	<p>This option appears to contradict one of the key objectives of this Core Strategy, i.e. the efficient and effective use of land, as well as National and Regional policy guidance. The density of development in existing 1st tier settlements is relatively low and there is considerable scope for</p>

	intensification without 'town cramming'. This option cannot be considered sustainable.
Kember Loudon Williams (representing Barratt Eastern Homes)	It is likely that at least 400-600 dwellings of the 1301 assumed to come forward from urban capacity are unlikely. There is therefore a significant shortfall which needs to be made from further allocations on greenfield land and by compressing the phasing periods outlined under Policy H2 and H3 to speed up delivery.
Planning Potential (representing Fairview New Homes)	Their client would like to provide support to the realistic approach taken by the Council in respect of brownfield development within existing settlement boundaries. However, in order that the character of existing settlements can be maintained and Policy H1 can be adequately implemented, Policy GB1 relating to Green Belt protection will need to incorporate a sufficient level of flexibility to allow the release of Green Belt land where it is considered appropriate.
Graham Jolley Ltd (representing Mr & Mrs Harold)	<p>It is noted some Green Belt land will need to be released and 70% of new housing is to be on greenfield sites, as sustainable extensions to existing settlements within the plan period 2001 - 2021.</p> <p>Their clients support the Council's preferred option for the distribution of land for new housing, so as to avoid the over intensification of existing residential areas, in accordance with H1.</p> <p>Their clients support the Council's Preferred Option for the General Location of future housing development, as set out in H1, on the understanding this does not exclude their own site (see call for sites ref number 114) and they feel the West Hockley area has the potential for a greater number of dwellings both during the pre 2015 period and between 2015 and 2021.</p>
G Jolley Ltd (representing J Hart)	<p>Their client does not support the Council's Preferred Options for the General Location and Phasing of future housing development, as set out in H1 & H2, which is to totally exclude North Ashingdon from any future housing development within the period up to 2025, now being considered.</p> <p>Some growth within the North Ashingdon area is felt to be appropriate given the pattern of the existing settlement, the established infrastructure and accessibility enjoyed by this more established area.</p>
Graham Jolley Ltd (representing Mr A C E Kingston)	Their client supports the Council's preferred option for the distribution of land for new housing broadly in accordance with the key diagram, so as to avoid the over intensification of existing residential areas, in accordance with H1.

	<p>The approach of focusing new housing development on the higher tier settlements, including Rayleigh, Rochford/Ashingdon, and Hockley/Hawkwell is supported, as part of the proposed balanced strategy.</p>
Graham Jolley Ltd	<p>Their client support the Council's preferred option for the distribution of land for new housing broadly in accordance with the key diagram, so as to avoid the over intensification of existing residential areas, in accordance with H1.</p> <p>The approach of focusing new housing development on the higher tier settlements, including Rayleigh, Rochford/Ashingdon, and Hockley/Hawkwell is supported, as part of the proposed balanced strategy</p>
RW Land and Planning (representing JF Spencer & Son Ltd)	<p>Acknowledge that brownfield sites should take priority over the development of greenfield sites. However, with a rising housing market over recent years, many of the sites identified in the Urban Capacity Study still remain undeveloped it could be argued that if the sites were suitable for development they would have come forward by now. The Council must therefore demonstrate that there is evidence to suggest that the remaining sites are genuinely available and deliverable within the specified phased timescale.</p>
Boyer Planning Ltd (representing Pond Chase Nurseries Ltd)	<p>Generally support the policy and the sequential approach it proposes.</p> <p>It will be important to ensure that within the Site Allocations Development Plan Document a mix of housing sites to provide a range of housing types that best meet the needs of the District are identified.</p>
Andrew Martin Associates (representing M D Smith & Son)	<p>Object to policy.</p>
Iceni Projects Ltd (representing Colonnade Land LLP)	<p>The policy objective of resisting intensification of smaller sites in residential areas is supported. Whilst the general principle of directing housing development towards previously developed land is accepted, deliverability of identified sites must be carefully monitored. The policy should be sufficiently flexible to allow for additional sites to be brought forward in order to demonstrate the continuous delivery of a five year housing land supply.</p>

Strutt & Parker (representing Mr G Marshall)	The realistic assessment of the limited nature of brownfield land within the district. coupled with the recognition of the harm to residential character that can be caused by excessive urban intensification is welcomed. and the percentage of dwellings likely to be derived from this source is in our view reasonable
Savills (representing Martin Dawn PLC)	In accordance with government objectives we agree with the prioritisation of previously developed sites to contribute to the borough's housing supply targets., greenfield sites which are sustainably located should be promoted for housing to ensure that the minimum housing targets are met and exceeded.
Sellwood Planning Ltd (representing Aston Unit Trust & J Needs)	The H1 distribution should set out the full sequential priority approach to the selection of development sites in Policy H2. This should start with previously developed land in sustainable locations followed by land in the 'tier 1 settlements' and then tier 2 and tier 3 settlements.

Preferred Option H2 – General Locations and Phasing	
Agent	Summary of representation(s)
Colliers CRE (representing Aber Ltd)	Agree with the general locations and phasing of residential properties. A flexible approach with regards the timing and release of land for residential development is needed. It is recommended that a greater proportion of the units are undertaken in the period up to 2015, and a proportion of units are transferred from the 2021 - 2025 period to the 2015 – 2021 in South East Ashingdon.
Whirledge and Nott (representing Messrs Smith and Francis)	Object to the exclusion of land at Sandhill Road, Eastwood and welcome the identification of Rayleigh as a Tier 1 settlement.
C & S Associates (representing Firstplan)	Policies H2 and H3 should be amended to include residential development allocated in the London Southend Airport and Environs Joint Area Action Plan.
Stolkin and Clements (Southend) LLP (representing Firstplan)	Further thought should be given to the distribution and extent of the housing allocations with a proportion of the housing allocations in Policies H2 and H3 being available for Tithe Park, perhaps described as: 'land to the south west of Great Wakering, adjoining the boundary with Southend'.
Andrew Martin Associates Ltd (representing A W Squier LTD)	Suggests that the areas identified in the policy do not correspond with the symbols in the Key Diagram. East Ashingdon and South East Ashingdon are particularly confusing as the symbols in the Key Diagram are better described as South Ashingdon and North East Rochford.
Christopher Wickham Associates (representing Inner London Group)	Suggests that the release of Green Belt land should be minimised and best use should be made of previously developed land.

	The remote settlements of Hullbridge and Canewdon are unsuitable for significant additional housing, either before or after 2015.
Strutt and Parker (representing Chelmsford Diocesan Board of Finance)	Support the broad locations for development detailed in H2 that are in accordance with the settlement hierarchy. Particularly support the indicative level of growth directed towards south Hawkwell.
Charles Planning Associates (representing Swan Hill Homes)	As set out above, Swan Hill supports the overall approach the Council has taken in this revised version of the Core Strategy.
Kember Loudon Williams Ltd (representing Barratt Eastern Counties)	It is very important that the framework properly distinguishes between what should be provided as part of new development schemes and what shouldn't. Support the strategy that new housing growth should be targeted at land South of Hawkwell. The main objection is to the phasing strategy.
Whirledge and Nott (representing J Robinson)	Welcome the allocation of residential development to the village of Canewdon prior to 2015. Object, however, to the identification of land South of Canewdon and feel strongly that it should be allocated to the North and North West of the village at Canewdon Hall Farm.
Planning Potential (representing Fairview New Homes)	Fairview New Homes would like to offer strong support in response to Preferred Policy H2 as well as to the general housing locations as shown on the accompanying Key Diagram. In particular, it is requested that the intention to extend the existing settlement boundary in the south west area of Rayleigh is retained
Graham Jolley Ltd (representing Mr and Mrs Harold)	Accordingly their clients ask for the tables in H2 and H3 to be amended so as to include a higher allocation for the West Hockley area.
Graham Jolley Ltd (representing Mr J Hart)	Their client, however, does not support the Council's Preferred Options for the General Location and Phasing of future housing development, as set out in H1 & H2, which is to totally exclude North Ashingdon from any future housing development within the period up to 2025, now being considered.
Graham Jolley Ltd (representing Mr A C E Kingston)	Their client is in broad support of the Council's Preferred Option for the General Location and Phasing of future housing development, as set out in H2, which is to include a significant element of new housing within the south west Rayleigh area. However, it is suggested that, in view of the above mentioned sustainable advantages of Rayleigh, together with the uncertainties of longer term housing demand, it is appropriate to consider a provision for some additional housing within the south west Rayleigh area for the post 2021 period.
RW Land and Planning (representing JF Spencer and Son Ltd)	Accepts that greenfield development will be necessary in order to achieve the required housing numbers. The reliance of Tier Two and Three settlements (Hullbridge, Great Wakering and Canewdon) to provide 860 houses pre 2021 is unsustainable,

	<p>unjustified and contrary to sustainable planning guidance at all levels.</p> <p>Tier 2 and 3 settlements have limited services and public transport and despite this 34% of Greenfield housing allocations are located here with no justification.</p> <p>Contrary to PPS3.</p> <p>Hockley allocation contrary to CSPO vision of concentrating development on Upper Tier settlements.</p> <p>Preferred Option and Key diagram should be amended to reduce housing numbers in Tier 2 and 3 settlements and redistribute the surplus to Tier 1 settlements – Hockley in particular. Land at Folly Chase is suitable and capable of accommodating circa 200 houses.</p>
JSP (representing N Jackson)	<p>Suggested development locations and justifications: LAND AT MAGEES NURSERIES, WINDSOR GARDENS and LAND EAST OF CLEMENTS HALL SPORTS CENTRE, HAWKWELL</p>
Design Associates (representing A F Merry)	<p>Their client is heartened to note that some green belt land is deemed to be required to be released for new housing, and that the council are in support of new residential development occurring mainly to the edge of existing main settlements. It is considered that Rayleigh is the only urban area with a principle town centre and it has the best to services in the district.</p> <p>Believe the locations shown on the key diagram for the allocation of new housing development does not give adequate recognition of the valuable contribution potential sites situated at the eastern edge of the settlement area of Rayleigh will give.</p> <p>It is considered that some modest growth to the east of Rayleigh could be accommodated without detriment to the upper Roach Valley or the separation between Rayleigh and Hockley.</p>
Graham Jolley (representing Stuart Ross)	<p>Their client supports the Council's preferred option for the distribution of land for new housing broadly in accordance with the key diagram, so as to avoid the over intensification of existing residential areas, in accordance with H1.</p> <p>The approach of focusing new housing development on the higher tier settlements, including Rayleigh, Rochford/Ashingdon, and Hockley/Hawkwell is supported, as part of the proposed balanced strategy.</p> <p>Their client supports the Council's Preferred Option for the General Location and Phasing of future housing development, as set out in H2, which is to</p>

	<p>include a significant element of new housing within the south Hawkwell area.</p> <p>Similarly, the preferred option H3, relating to the General Location for housing post 2021, which incorporates a further significant element of housing within the south Hawkwell area, is supported by their client.</p> <p>H2 contradicts GB1 and should be reworded.</p>
Croudace Strategic Ltd	<p>Unrealistic build rates. More detail in Core Strategy would speed up delivery. Many locations fail to PPS3's deliverability criteria and conflict with other CS policies. North of London Road, Rayleigh - Deliverable: Yes based on information available, but to different timescales West Rochford - Deliverable: No West Hockley - Deliverable: No South Hawkwell - Deliverable: No East Ashington - Deliverable: Unknown SE Ashingdon - Deliverable: Yes based on information available. SW Hullbridge - Deliverable: No SW Great Wakering - Deliverable: Yes, but at a reduced scale. West Great Wakering - Deliverable: No</p> <p>Of the 11 locations identified, there are fundamental delivery problems with six, which casts doubt over the whole Core Strategy.</p>
Graham Jolley Ltd	<p>Their client supports the Council's Preferred Option for the General Location and Phasing of future housing development, as set out in H2, which is to include a significant element of new housing within the south Hawkwell area.</p>
David Grew	<p>Assuming the proposed new development has a density of 50 dph, which is highly unlikely, RDC are proposing to release a minimum of 29 hectares of Green Belt by 2015, for housing alone. This is an unsustainable approach and does not represent efficient and effective use of land.</p>
Swan Housing Association	<p>Feel that the land to the south west of Hullbridge represents an excellent opportunity to deliver a sustainable community which is in line with the Council's vision of future development in the district.</p>
Boyer Planning Ltd (representing R Ricks)	<p>Would support this Policy. It is clear that settlement boundaries will need to be amended to meet the District's housing requirement.</p>
Mr Ashley Robinson (representing Mr & Mrs Houghton)	<p>High density residential development is totally inappropriate on important green belt areas surrounding existing development. If any residential development is deemed appropriate it should be of a low density buffer of one or two dwellings to maintain</p>

	the rural character and well being of the area, which is low density at the Great Wheatley area.
Andrew Martin Associates (representing M D Smith & Son Ltd)	Rawreth should be identified as forming part of the proposed growth area to the west of Rayleigh. Where opportunities exist for developing previously developed land exist these should take precedence over greenfield housing allocations, subject to sites being available and deliverable.
Iceni Projects Ltd (representing Colonnade Land LLP)	<p>Iceni would suggest that housing numbers and delivery times deserve clarification. In view of the guidance provided by PPS3 it is important that the Core Strategy is not perceived as placing a continuing reliance on windfall sites. Should this be the case, the Core Strategy should look to identify additional land to meet its housing target under Policy H2.</p> <p>However, without providing any notional site areas, development density, or land take of associated facilities (such as those listed within H Appendix 1) it is difficult to quantify how likely it is that these sites will be capable of meeting the District's housing target. Iceni would suggest that this information needs to be incorporated within further iterations of the Core Strategy.</p> <p>Colonnade is content to focus on the merits of promoting Coombes Farm (or East Rochford) as a suitable location for residential development rather than criticising those areas identified. it is evident that there are compelling grounds for identifying Coombes Farm (within an East Rochford area designation) under Policy H2, and that in particular, it should be recorded as a priority location for helping to meet the District's five year housing land supply. town centre entirely.</p>
Countryside Properties (Southern) Ltd	Support the allocation of 650 units of land North of London Road, Rayleigh
Countryside Properties (Southern) Ltd	<p>The key diagram is too vague and there should be a clearer identification of growth areas. It is not possible to ascertain the extent/location of likely development areas (not just North of London Road) and therefore their relationship to existing residents/road network etc.</p> <p>No appropriate density ranges are given within the Core Strategy, so again it is difficult to ascertain the likely land area required to achieve the number of units required/specified.</p> <p>Believe that appropriate density ranges should be specified (a separate policy).</p> <p>As stated above, it is not clear where, on land west of Rayleigh, these units are to be provided, but if the existing electricity power lines/pylons are seen as a</p>

	<p>western barrier to development, it must be emphasised that these can be relocated. There appears to be no reasoning/justification as to why the figure of 650 units has been chosen.</p> <p>Agree that development should be comprehensively planned, and support the principle of providing a range of other uses and infrastructure to serve any urban extension west of Rayleigh. However, such infrastructure must be reasonably associated with the impacts of the development.</p> <p>Suggest however that due to the limited constraints to delivery of development on land north of London Road (West Rayleigh) that all 650 units could be delivered by 2015, assuming a planning permission can be obtained soon after the adoption of the Core Strategy.</p>
<p>Strutt & Parker (representing Mr G Marshall)</p>	<p>Support the aim of securing a balanced strategy, and as set out above, the general distribution across the district. Great Wakering as a second tier settlement albeit that this is a smaller settlement with a large rural hinterland. It is significantly smaller than the settlements identified in the top tier and therefore the identification of some 350 houses up to 2021 with a further 160 post 2021 it is questioned. A modest allocation such as that identified for Canewdon to anchor local services would be more appropriate.</p> <p>A similar consideration relates to Hullbridge which is identified as accommodating some 450 houses up to 2021 with a further 90 post 2021. Hullbridge is a large village although has some facilities in terms of shops and a bus service together with a school.</p>
<p>Strutt and Parker (representing Mr G Marshall)</p>	<p>As a consequence of the above, the Peggle Meadow site is the most sustainable site in the District for the following reasons: -</p> <ul style="list-style-type: none"> • The close proximity of the site to the proposed new railway station at Southend Airport which is due for completion in 2009. • The close proximity of the site to the A127_ • The ability of the site to contribute to a sustainable cycle network and footway link (Green Grid Greenway No. 18). • Not only is the site free from flood risk, but it could also theoretically contribute to the reduction of existing fluvial flood risk currently affecting residential areas further downstream by sustainable urban development and enhanced flood water storage by means of dry ponds within a large green open space located to the south of the site next to the Borough boundary. • The close proximity of the site to local shops. Three major areas of employment. Southend Hospital and

	<p>Rochford Town Centre</p> <ul style="list-style-type: none"> • The site lies on the main bus routes that run through the District and is served by bus stops Immediately outside the site on Southend Road. • The Highway Authority has agreed in principle that the site could be served by a traffic-controlled access off Southend Road.
<p>Edward Gittins & Associates (representing Crowstone Properties Ltd)</p>	<p>It is unclear what process of selection was undertaken to arrive at this particular choice of area.</p> <p>Supports phasing if this assists in ensuring land allocations are more evenly spread and hence available throughout the plan period, but the reasoning behind the split before and after 2015 is unclear.</p> <p>There is no reference to the possible option of development on the western side of Ashingdon (an area has been submitted on behalf of Crowstone Development Ltd).</p>
<p>Edward Gittins & Associates (representing Mr Dudley Ball)</p>	<p>Considers that the remaining balance of 3,489 units for the period up to 2025 represents a substantial commitment and requires careful decisions in relation to its future distribution.</p> <p>Suggests that the Council can be justifiably proud of its record in directing a high proportion of recent growth to brownfield sites, however, the decline in this finite resource is inevitable. Agree that brownfield sites are dwindling and there is an increasing need to use greenfield sites. The 30% allocation to brownfield sites is probably realistic and hence deliverable.</p> <p>It is also important not to rely on regular reviews of the Green Belt boundary and this points to the need for long term land reserves needed for development being taken out of the Green Belt as part of the Core Strategy.</p> <p>Believe that the approach to the preferred distribution is the right one but have not seen the evidence to support this important claim.</p> <p>The distribution of housing should be considered holistically with other development needs of the district such as employment and community facilities rather than in isolation to ensure that they are closely and geographically associated and reflect a comprehensive and coherent strategy.</p> <p>In turning to H2 General Locations and Phasing - Preferred Option, it is unclear what process of selection was undertaken to alight on this particular choice of area.</p>

	<p>Supports phasing if this assists in ensuring land allocations are more evenly spread and hence available throughout the plan period, but the reasoning behind the split before and after 2015 is unclear.</p> <p>Notes the inclusion in H2 of a location at West Hockley with a projected capacity of 50 units in the period to 2015. Suggests that this may relate to potential capacity that might become available on land known as Pond Chase Nurseries.</p> <p>Concern expressed regarding review of the Green Belt boundary in the general vicinity of Pond Chase Nurseries and Church Road, Hockley. The existing Green Belt boundary in this part of the settlement is highly arbitrary and has been blurred by development that has taken place on the edge of the town over a number of years.</p>
Bidwells (representing H R Philpot & Sons (Barleylands) Ltd)	Supports H2. Suggests that deliverability is a key consideration at the preliminary stage. The Council should ensure there will be adequate land supply to provide housing, affordable housing, employment, protection on green infrastructure and leisure, tourism and community facilities, especially for Hullbridge.
Sellwood Planning Ltd (representing Aston Unit Trust & J Needs)	<p><u>Proposed Changes to Policy H2</u></p> <ul style="list-style-type: none"> - Reduce the Hullbridge and Great Wakering housing allocations to around 100 dwellings each and delete the Canewdon greenfield allocation - Distribute the 'excess' Hullbridge, Great Wakering and Canewdon housing provisions to the three towns giving first priority to Rayleigh as the largest and most sustainable town - Add to the Rayleigh allocations 200 dwellings at Wellington Road phased in the pre 2015 period - Spread the north of London Road allocation over a longer time period.
Ashley Robinson (representing Mr D Houghton)	High density development is inappropriate on Greenbelt areas surrounding existing development. Any more development in Rayleigh is totally unacceptable.

Alternative Option H2 – General Locations and Phasing	
Agent	Summary of representation(s)
Croudace Strategic Ltd	Land at Mount Bovers Lane should be considered favourably.
RW Land & Planning (representing J F Spencer & Son Ltd)	Welcome the comments regarding North East Hockley and agree that the location would place undue pressure on the highway network and that it is unviable for development.

Countryside Properties Ltd	<p>There is no clear indication as to why 650 units have been identified for west Rayleigh and not more i.e. how this figure was reached. Rayleigh has the best access to services and is more ideally located in terms of retail and services.</p> <p>There should be flexibility in terms of timing of development. Delivery of strategic growth sites may need to be brought forward if housing delivery is falling short of forecasts, and the minimum of 5 year housing supply is under threat. Regular review of housing delivery is required.</p>
Countryside Properties LTd	<p>Alternative Options. Support Third to Sixth alternative options. West of Rayleigh is the most sustainable and accessible location for further development in Rayleigh, as other possible sites have serious policy, environmental or access/capacity constraints to delivery. Therefore support the Council's approach to not identifying sites north, east or south/south east of Rayleigh for development, and limiting any development to the south west.</p>
Strutt & Parker (representing Mr G Marshall)	<p>Suggest Peggle Meadow is considered as a preferred option for development as it more sustainable as a result of its close proximity to Southend Airport, the risk of flooding is low.</p>

Preferred Option H3 – General Locations Post-2021	
Agent	Summary of representation(s)
Christopher Wickham Associates (representing Inner London Group)	<p>Considers there should be minimal new development allocated in Hullbridge and Canewdon given their remoteness and the likelihood of harm to the rural character of the places.</p>
Strutt & Parker (representing Chelmsford Diocesan Board of Finance)	<p>Supports the broad locations for development detailed in H2, particularly the indicative level of growth directed towards south Hawkwell.</p>
Colliers CRE (representing Aber Ltd)	<p>Need to maintain flexibility in order to ensure certainty to the delivery of the 15 year supply, particularly if any of the locations identified in the period 2021 - 2025 need to be brought forward in order to maintain the 5 year supply.</p> <p>Appropriate phasing will avoid piecemeal development, and on a practical point avoids a state of uncertainty between the two phases where there would be unfinished work</p> <p>It is recommended that a proportion of units are transferred from the 2021 - 2025 period to the 2015 - 2021 period. This approach would assist in paying for front end costs</p>
Firstplan (representing Stolkin and Clements)	<p>Further thought should be given to the distribution and extent of the housing allocations with a proportion of the housing allocations in Policies H2 and H3 being available for Tithe Park, perhaps</p>

	described as: 'land to the south west of Great Wakering, adjoining the boundary with Southend'
Croudace Strategic Ltd	The comment that the release of land needs to be flexible is welcomed. The policy should allow for sites to be brought forward prior to 2021 should non-delivery of the Policy H2 sites become apparent.
Andrew Martin Associates (representing A W Squier Ltd)	There is no need for this policy or its table. There is no evidence or reasoning to support the number or locations selected for this later phase of development.
David Grew (representing David Grew)	This continuing release of Green Belt land is unsustainable. Intensification of Town Centre and urban areas should be maximised prior to release of Green Belt.
Design Associates (representing AF Merry)	Taking into account the above we ask the council to give further consideration to the H2 options so as to provide for a greater number of dwellings around Rayleigh with some additional housing to the east of Rayleigh not only for the 2001-2021 period but also the post 2021 period.
Charles Planning Associates (representing Swan Hill Homes Ltd)	Swan Hill supports the general principles of this policy, and that the Council has sought to make provision for a 15-year supply of housing land supply, from the date of adoption of the document, as set out in PPS3. Swan Hill considers it is important that the Policy provision sets out that this is a minimum level post 2021, and is likely to change over the course of the Core Strategy period.
Whirlledge and Nott (representing Mr J Robinson)	Welcome the allocation of residential development to the village of Canewdon prior to 2015. I do however object to the identification of land South of Canewdon and feel strongly that it should be allocated to the North and North West of the village at Canewdon Hall Farm.

<p>Kember Loudon Williams Ltd (representing Barratt Eastern Counties)</p>	<p>As is made clear (Paragraph B9 of Circular 5/05) contributions should not be used to make good existing deficiencies in infrastructure provision. Nor are they to be used to secure contributions to the achievement of wider planning objectives that are not necessary for consent to be granted. In that context the Core Strategy should set this out as its policy framework.</p> <p>Main objection is to the phasing strategy and in turn the very low annual output figures identified for the South of Hawkwell, although our comments will be relevant to the other housing locations and their associated phasing regime identified by the Council.</p> <p>Given the anticipated phasing and consequential low delivery rates in the draft Core Strategy, there is a concern that in this area of high demand for new housing, demand will continue to outstrip supply.</p> <p>Concerns over the urban capacity study indicate that housing land supply is in shortfall - quicker housing deliver is therefore necessary. If the Inspector accepts our concerns over the urban capacity study then the phasing strategy and land supply shortfall will need to be addressed.</p>
<p>Graham Jolley Ltd (representing Mr A C E Kingston)</p>	<p>Their client is in broad support of the Council's Preferred Option for the General Location and Phasing of future housing development, as set out in H2, which is to include a significant element of new housing within the south west Rayleigh area. However, it is suggested that, in view of the above mentioned sustainable advantages of Rayleigh, together with the uncertainties of longer term housing demand, it is appropriate to consider a provision for some additional housing within the south west Rayleigh area for the post 2021 period.</p>
<p>Graham Jolley Ltd (representing Graham Jolley)</p>	<p>Similarly, the preferred option H3, relating to the General Location for housing post 2021, is supported by their client.</p>
<p>RW Land & Planning (representing J F Spencer & Son Ltd)</p>	<p>The continued reliance on lower tier settlements post 2021 is again unjustified and unsustainable with 340 homes proposed. These locations, even following improvements to the infrastructure will not provide genuine alternatives to the private car due to the length of journeys required to get to services, facilities and employment.</p>
<p>Andrew Martin Associates Ltd (representing M D Smith & Son Ltd)</p>	<p>Rawreth should be identified as forming part of the proposed growth area to the west of Rayleigh. Where opportunities exist for developing previously developed land these should take precedence over greenfield housing allocations, subject to sites being available and deliverable.</p>
<p>Iceni Projects Ltd (representing Colonnade</p>	<p>Colonnade welcomes the fact that the Core Strategy correctly responds to the requirements of PPS3 in</p>

Land LLP)	identifying broad locations for the delivery of a fifteen year housing land supply. it remains to be seen whether the areas identified are sufficiently robust to meet the District's longer term housing requirements, because at this stage, there is insufficient information to comment.
Countryside Properties (Southern) Ltd	It is noted that there are no numbers allocated for Rayleigh post 2021. Bearing in mind the sustainability and accessibility credentials for Rayleigh as opposed to other settlements within the district, we would argue that longer term growth should be planned for, on top of the earlier allocations.
Edward Gittins & Associates (representing Crowstone Properties Ltd)	Need to justify the general locations and the capacity for the areas identified and ensure that site locations are sustainable and justifiable as Preferred Options. Information and analysis to support the general locations both pre and post 2015 and post 2021 is lacking and suggest that these should be included to ensure the soundness of the Plan.
Edward Gittins & Associates (representing Mr Dudley Ball)	Need to justify the general locations and the capacity for the areas identified and ensure that site locations are sustainable and justifiable as Preferred Options. Information and analysis to support the general locations both pre and post 2015 and post 2021 is lacking and suggest that these should be included to ensure the soundness of the Plan.
Bidwells (representing H R Philpot & Sons (Barleylands) Ltd)	Supports the general principles of this policy. Believes that further housing growth in Hullbridge would continue to support the strategy of creating centre focus as identified in H2, such as a range of housing mix, affordable housing, employment enhancement, protection of the existing wider environment, leisure, tourism and community facilities and new football pitches. In addition they consider that additional housing growth will ensure the provision of a new primary school, formal play provision, strategic open space/planting, country park and riverside walk linking into the proposed development by encompassing the existing routes and water frontage.
Sellwood Planning Ltd (representing Aston Unit Trust and J Needs)	document allocates too limited a housing provision to the three towns and an unsustainable level of new housing to the second and third tier settlements.

Alternative Option H3 – General Locations Post-2021

Agent	Summary of representation(s)
Croudace Strategic Ltd	This policy must provide sufficient flexibility to allow for sites to come forward pre-2021 to make up any shortfall from the Policy H2 sites.

Andrew Martin Associates Ltd (representing A W Squier Ltd)	The Council's reasons for departing from the Alternative Option are not adequately justified.
--	---

Preferred Option H4 – Affordable Housing	
Agent	Summary of representation(s)
Colliers CRE (representing Aber Ltd)	It is recommended that in larger developments the affordable housing (both social rented and intermitted tenure) are clustered in groups of 6 to 10 units throughout the development in order to aid with on going management and maintenance undertaken by RSL or other body.
Firstplan (representing Stolkin & Clements)	Support this policy which seeks at least 35% of affordable housing on all developments of 10 or more units or on sites greater than 0.5ha unless there are site constraints which make the provision impossible.
Christopher Wickham Associates (representing Inner London Group)	It is considered that the 'pepper potting' of affordable housing throughout larger developments is not always appropriate in management and maintenance terms
Charles Planning Associates (representing Swan Hill Homes)	In general terms, Swan Hill supports the approach. A greater degree of flexibility should be set out in the policy. Registered Social Landlords (RSLs) may consider the 'pepper potting' of affordable dwellings throughout larger sites can have significant logistical and cost implications. Clustering should be considered.
Kember Loudon Williams Ltd (representing Barratt Eastern Counties)	As currently drafted we feel that the policy is not concise enough and that the policy does not reflect current guidance. The policy should be redrafted so that "a target of 35% affordable housing shall be provided on all developments of 10 or more units..." The last policy paragraph provides some scope to relax this policy, if there are clear site constraints that make on site provision impossible. The policy, though, is not particularly clear on what would constitute exceptional circumstances.
Planning Potential (representing Fairview New Homes)	The flexibility and recognition that it may not be possible to provide the full requirement of affordable housing on all sites is offered strong support by our client. It is requested that the Council seek to retain an element of negotiation within Policy H4 when developing the Core Strategy to submission stage in order to allow a sensitive approach to local housing need as it fluctuates throughout the Council's administrative area rather than a blanket approached. Management is a real issue for social landlords, and often it is not practical to adopt a 'pepper

	pot' approach, and further consideration should be had of the 'user' / 'management' requirements when developing the Core Strategy to Submission Stage.
RW Land & Planning (representing J F Spencer & Son Ltd)	We do not accept the desire by the Core Strategy to "pepper pot" social housing throughout developments; it causes difficulty for Housing Associations to manage their properties effectively and efficiently. This should be amended to allow for clusters of social housing units in say, groups of 15-20.
Iceni Projects Ltd (representing Colonnade Land LLP)	Colonnade supports the proposed affordable housing target of 35%, It is likely that only Greenfield housing sites will be capable of meeting this target, Colonnade would also recommend that the Core Strategy specifically enables 100% affordable housing schemes to be brought forward on unallocated sites, potentially as rural exception proposals.
Countryside Properties (Southern) Ltd	Support the principle of this policy, but must stress the need for flexibility in affordable housing provision, should it affect economic viability when competing against other community/ social/ transport infrastructure requirements sought as part of development of a site.
Edward Gittins & Associates (representing Crowstone Properties Ltd)	<p>Greater emphasis must be given in future to the delivery of affordable units, especially having regard to the high house values which preclude so many entering the housing market.</p> <p>Recognise that Exceptions Policies are necessary but deliver very little in terms of numbers and that it is the larger sites that have the viability which enables a significant proportion of affordable units to be provided or cross-subsidised by free market housing.</p> <p>Support the wording of H4 Affordable Housing - Preferred Option and favour this to the Alternative Options in H4.</p> <p>Express concern regarding the 'pepper potting' of affordable housing throughout larger developments. Agree that large blocks of affordable housing should be avoided if possible but 'pepper potting' can give rise to design and management problems. Prefer a more general reference to the need to avoid large blocks of affordable housing and the need to integrate affordable and free market housing in a harmonious way.</p>
Edward Gittins & Associates (representing Mr Dudley Ball)	Greater emphasis must be given in future to the delivery of affordable units, especially having

	<p>regard to the high house values which preclude so many entering the housing market.</p> <p>Recognise that Exceptions Policies are necessary but deliver very little in terms of numbers and that it is the larger sites that have the viability which enables a significant proportion of affordable units to be provided or cross-subsidised by free market housing.</p> <p>Support the wording of H4 Affordable Housing - Preferred Option and favour this to the Alternative Options in H4.</p> <p>Express concern regarding the ‘pepper potting’ of affordable housing throughout larger developments. Agree that large blocks of affordable housing should be avoided if possible but ‘pepper potting’ can give rise to design and management problems. Prefer a more general reference to the need to avoid large blocks of affordable housing and the need to integrate affordable and free market housing in a harmonious way.</p>
--	---

Preferred Option H5 – Dwelling Types	
Agent	Summary of representation(s)
Colliers CRE (representing Aber Ltd)	The idea of providing a mix of dwelling types in both size and tenure is supported, however, it is considered that to make a specific requirement that a proportion of the affordable housing to be three bedroom dwellings is too prescriptive
Charles Planning Associates (representing Swan Hill Homes Ltd)	<p>With the exception of providing a suitable proportion of the provision of affordable units with three-bedrooms, the policy appears to represent the best option for ensuring flexibility for new housing developments.</p> <p>In respect of the reference to the Strategic Housing Market Assessment for Thames Gateway South Essex, it is important that if the Council chooses to rely on such assessments as a key factor in determining the appropriate level of mix, it is important that such an assessment is up-to date, and represent the most appropriate model for assessment the level of housing requirements.</p>
Kember Loudon Williams Ltd (representing Barratt Eastern Counties)	<p>The main thrust of the policy is supported That said, it is important that the policy does not rely completely on the SHMA since it does not fully reflect the housing market and in particular what local people demand of their new housing stock.</p> <p>The SHMA will be largely based on housing need and in that context does not take into account people's housing market aspirations. Consequently, a policy</p>

	framework which focuses just on local need would set aside this important facet of the housing market.
RW Land & Planning (representing JF Spencer & Son Ltd)	It is imperative that H5 makes reference to the influence of market demands and does not solely rely on the advice of the Strategic Housing Team as the policy currently intimates.
Iceni Projects Ltd (representing Colonnade Land LLP)	Colonnade welcomes the emphasis placed in the Core Strategy on delivering a mix of dwelling types, whilst making specific reference to the provision of family and affordable housing.
Edward Gittins & Associates (representing Crowstone Properties Ltd)	Support the wish to ensure a mix of dwelling types but much will depend of the size of the particular development, the character of the area, and any other local constraints or factors. Concern expressed regarding a blanket policy requiring a housing mix. The mix may be triggered by the requirement to provide affordable housing over and above the thresholds in H4. Suggests that the words "Where appropriate," should be inserted at the beginning of H5.
Edward Gittins & Associates (representing Mr Dudley Ball)	Support the wish to ensure a mix of dwelling types but much will depend of the size of the particular development, the character of the area, and any other local constraints or factors. Concern expressed regarding a blanket policy requiring a housing mix. The mix may be triggered by the requirement to provide affordable housing over and above the thresholds in H4. Suggests that the words "Where appropriate," should be inserted at the beginning of H5.

Alternative Option H5 – Dwelling Types

Agent	Summary of representation(s)
Firstplan (representing Stolkin & Clements LLP)	Stolkin and Clements (Southend) LLP support this policy which confirms that new developments will be required to contain a mix of dwelling types including a proportion of the affordable housing provided to be three-bedroom dwellings.

Preferred Option H6 – Lifetime Homes

Agent	Summary of representation(s)
Firstplan (representing Stolkin & Clements)	Support policy
Charles Planning Associates (representing Swan Hill Homes)	objects to the Council's preferred options where all new dwellings should be provided to the Lifetime Homes Standard. Alternative option is more suitable. Should be determined on a case by case basis.
Planning Potential (representing Fairview New Homes)	Support recognition that in some instances the Lifetime Homes Standard will be unable to be met. Flexibility needs to be retained.

RW Land & Planning (representing J F Spencer & Son Ltd)	Welcome viability testing
Boyer Planning Ltd (representing Pond Chase Nurseries Ltd)	Lifetime Homes Standard is unnecessary as it ignores the general movement of people between housing locations.

H Appendix 1	
Agent	Summary of representation(s)
Kember Loudon Williams Ltd (representing Barratt Eastern Counties)	<p>It is recognised that necessary infrastructure provision is an important part of creating a sustainable development and in that context appendix H1 and Policy H3 is supported.</p> <p>It is therefore essential that the framework acknowledges the importance of Circular 05/05 and the tests</p>
RW Land & Planning (representing JF Spencer & son Ltd)	Welcome the associated infrastructure required in relation to development at West Hockley.
Iceni Projects Ltd (representing Colonnade Land LLP)	<p>There is concern that the table in H Appendix 1 fails to provide the necessary justification for the proposed improvements in infrastructure</p> <p>For the avoidance of doubt, Colonnade would welcome similar information being provided as a caveat for the allocation of Coombes Farm. Colonnade is fully committed to delivering infrastructure and community improvements, and for Coombes Farm to properly address the needs of future and existing residents.</p>
Countryside Properties (Southern)Ltd	<p>Their approach has always been to provide the necessary infrastructure to serve any such development.</p> <p>With the above in mind, we are happy to state our support, in principle, for those infrastructure requirements for a new urban extension on land north of London Road, as set out in H Appendix 1 of the recently published Core Strategy Preferred Options (October 2008).</p> <p>We therefore accept that any development on land west of Rayleigh within our control may well have to accommodate land for a primary school (1.1 ha), provide a link to Green Grid Greenway no.13, provide for public transport enhancements, Sustainable Drainage Systems, public park land, play space, community and youth facilities where a need is demonstrated, and the scale of such provision relates reasonably to the scale of development permitted on that land within our control. Appendix 1 also identifies a requirement for a Primary Care Centre. Land could be safeguarded for such purposes, but again the extent of such a commitment, or any financial commitment</p>

	towards such a facility would have to be justified
Bidwells (representing H R Philpot & Sons (Barleylands) Ltd)	<p>Considers that growth potential in this location will need to encompass land to the north west of Hullbridge partly confined by a proposed coastal protection belt.</p> <p>Suggests that the provision of a new primary school, formal areas of play, country park and riverside walk should be considered to enhance the infrastructure already set out within H Appendix 1.</p>
Sellwood Planning Ltd (representing Aston Unit Trust and J Needs)	The representations in respect of Policy H2 set out the case in favour of allocating a further housing site at Wellington Road, Rayleigh. In view of this, reference needs to be made in Appendix 1 to the range of social and physical infrastructure improvements which will be necessitated by the development of the site.

Summary of Agents Comments on the Green Belt Chapter

Protection of Green Belt	
Agent	Summary of representation(s)
Colliers CRE (representing Aber Ltd)	A proportion of the Green Belt will have to be reallocated to accommodate additional housing.
Firstplan (representing C & S Associates)	Support changes to green belt to accommodate new housing and employment
Firstplan (representing Stolkin & Clements)	Green Belt boundaries will need to be amended to enable the required development to take place. If the Tithe Park site is taken out of the Green Belt, careful modelling of the proposal can provide well managed and defensible boundaries which will afford protection in the future to the areas to the north and west, thereby preventing any potential coalescence.
Croudace Strategic Ltd	The statement that "some Green Belt land is more worthy of protection than others" is welcomed. Unfortunately it has not been applied to Policy H2 which identifies land at South Hawkwell (presumably Land off Thorpe Road) as being suitable for development although the Local Plan Inspector said the Green Belt had an important function in this location.
Planning Potential (representing Fairview New Homes)	Support reallocation of some Green Belt Land, and suggest south west Rayleigh as an ideal location for this.

Preferred Option GB1 – Green Belt Protection

Agent	Summary of representation(s)
-------	------------------------------

Colliers CRE (representing Aber Ltd)	The need to maintain buffers to prevent the coalescence of individual settlements is supported.
Croudace Strategic Ltd	The reference to preventing coalescence accords with Government policy, but conflicts with Policy H2
Christopher Wickham Associates (representing Inner London Group)	The objective of GB1 to direct development away from the Green Belt is strongly supported although this is at odds with an expectation that 70% of new housing will need to be provided on Greenfield sites.
Charles Planning Associates (representing Swan Hill Homes Ltd)	It is important that Policy GB1 has regard to the need for a Green Belt boundary review. This should be noted in GB1 as being a means to ensure that minor Greenfield sustainable extensions can occur without offending the overarching Metropolitan Green Belt objectives.
Kember Loudon Williams Ltd (representing Barratt Eastern Counties)	This policy supported subject to it being made clear that housing land supply is a key component of the Core Strategy and as such there may be a need to review the Green Belt when delivery of housing stalls.
Planning Potential (representing Fairview New Homes)	In line with our comments above, our client would like to endorse Policy GB1 in that some allowance remains within the policy to permit the release of Green Belt land where appropriate and necessary.
Graham Jolley Ltd (representing Mr A C E Kingston)	GB1 needs to be amended, since the stated intention of this option, to seek to direct development away from the Green Belt, is considered to be in conflict with the controlled balanced release of some Green Belt land, which is clearly unavoidable as an integral part of the Councils stated future Core Strategy.
Graham Jolley Ltd (representing Graham Jolley Ltd)	It is felt the wording of GB1 is misleading, unrealistic and inconsistent with the preferred options H2 and H3. Accordingly our client considers the wording of GB1 should be amended to reflect the acceptance of some Green Belt release.
Andrew Martin Associates (representing M D Smith & Son)	We will seek to direct development away from the Green Belt, minimise the reallocation of Green Belt land and will prioritise the protection of Green Belt land based on how well the land helps achieve the purposes of the Green Belt. We will consider the scope for redevelopment of previously developed land within the Green Belt ahead of releasing greenfield sites within the Green Belt achieve the purposes of the Green Belt.
Mr David Grew (representing Mr David Grew)	H2 is in conflict with this policy.
Edward Gittins & Associates (representing Crowstone	Support the conclusion that the time has now come when the current boundaries of the Green

<p>Properties Ltd)</p>	<p>Belt need to be reviewed to ensure development required by the East of England Plan can be met in an environmentally acceptable way.</p> <p>Suggests that the revising of green belt boundaries should be long term and avoid repetitive short term reviews. The general locations in H2 and H3 should have regard to how well the land helps achieve the purposes of the Green Belt as outlined in GB1.</p> <p>Noted that strategic buffers are not mentioned or featured on the Key Diagram and should be deleted as green belt serves this purpose.</p> <p>Need clear evidence to support the general locations for growth in terms of their relative impact on the purposes of the Green Belt. Suggests there is a lack of joined up thinking between the Preferred Options in H1 and H2 and that in GB1.</p>
<p>Edward Gittins & Associates (representing Mr Dudley Ball)</p>	<p>Support the conclusion that the time has now come when the current boundaries of the Green Belt need to be reviewed to ensure development required by the East of England Plan can be met in an environmentally acceptable way.</p> <p>Suggests that the revising of green belt boundaries should be long term and avoid repetitive short term reviews. The general locations in H2 and H3 should have regard to how well the land helps achieve the purposes of the Green Belt as outlined in GB1.</p> <p>Noted that strategic buffers are not mentioned or featured on the Key Diagram and should be deleted as green belt serves this purpose.</p> <p>Need clear evidence to support the general locations for growth in terms of their relative impact on the purposes of the Green Belt. Suggests there is a lack of joined up thinking between the Preferred Options in H1 and H2 and that in GB1.</p> <p>In addition to the need to amend the Green Belt boundary to facilitate the selected General Locations, it is considered that a wider review of Green Belt boundaries should also be undertaken. Suggest that there are many small scale opportunities to adjust and rationalise the Green Belt boundary which would enable various small sites to come forward without material conflict with the purposes of the Green Belt such as Church Road, Hockley, where a</p>

	more appropriate urban edge could be defined.
--	---

Rural Diversification, Green Tourism and Recreational Uses	
Agent	Summary of representation(s)
Iceni Projects Ltd (representing Colonnade Land LLP)	Colonnade would promote the inclusion of an affordable housing exception policy within the Core Strategy.
Edward Gittins & Associates (representing Crowstone Properties Ltd)	Support the Council's aims to promote and secure a vibrant and prosperous countryside and one that encourages recreational uses. The opportunities for formal and informal recreational provision on the urban fringe (particularly development adjacent to the green belt) should be one of the determining factors in the selection of locations for growth and subsequently at the Site Allocations DPD stage.
Edward Gittins & Associates (representing Mr Dudley Ball)	Support the Council's aims to promote and secure a vibrant and prosperous countryside and one that encourages recreational uses. The opportunities for formal and informal recreational provision on the urban fringe (particularly development adjacent to the green belt) should be one of the determining factors in the selection of locations for growth and subsequently at the Site Allocations DPD stage.

Preferred Option GB2 – Rural Diversification and Recreational Uses	
Agent	Summary of representation(s)
Whirledge and Nott (representing Whirledge & Nott)	The proposal is in conflict with PPS7 and will do nothing to encourage the rural economy. It is accepted that the government supports re-use of rural buildings however this policy sets out in its first sentence 'a restrictive approach' in direct conflict. Most diversification proposals are on developed land and as such have no impact on the openness of the Green Belt. Wider sustainability issues should not focus solely on transport.
Charles Planning Associates (representing Swan Hill Homes Ltd)	Swan Hill generally supports the Council's policy approach towards rural diversification and provision of recreational uses within the Green Belt.
John H Bayliss Ltd (representing Mr & Mrs Wilson)	Forms of rural diversification that will be considered acceptable in appropriate circumstances in the Green Belt include: Conversion of existing buildings for small scale employment use Green Tourism Outdoor recreation and leisure activities Conversion of buildings to bed and breakfast /hotels
Andrew Martin Associates (representing M D Smith & Son)	Forms of rural diversification that will be considered acceptable in appropriate circumstances in the Green Belt include:

	<ul style="list-style-type: none"> . Conversion of existing buildings for appropriate employment use, particularly on larger previously developed sites that are able to contribute to sustainable job creation . Green tourism (crossed out/deleted) . Outdoor recreation and leisure activities . Conversion of buildings to bed and breakfasts/hotels
A W Squier Ltd	PPS7 is more supportive of Diversification of rural assets than the Core Strategy.

Summary of Agents Comments on the Economic Development Chapter

Introduction – Economic Development	
Agent	Summary of representation(s)
Edward Gittins & Associates (representing Crowstone Properties Ltd)	<p>Do not consider the document sufficiently recognises the need to adopt a strategy which seeks to make the District more self-contained and hence more sustainable.</p> <p>Suggests that the level of out commuting stated represents a very heavy reliance on employment beyond the District's boundaries. The District is therefore highly unsustainable in this particular respect.</p> <p>Suggest that in addition to employment growth stimulated via Thames Gateway South Essex and Southend Airport, smaller and more localised initiatives need to develop to reduce commuting time and reduce reliance on employment outside the district.</p> <p>Welcome the initiatives set out to deliver increased employment provision to meet the needs of the District and its growing population over the plan period.</p> <p>Suggest that housing and employment should be considered jointly to ensure the best possible "fit" which would encourage new and more accessible employment opportunities and improve the soundness of the Plan.</p>
Edward Gittins & Associates (representing Mr Dudley Ball)	<p>Do not consider the document sufficiently recognises the need to adopt a strategy which seeks to make the District more self-contained and hence more sustainable.</p> <p>Suggests that the level of out commuting stated represents a very heavy reliance on employment beyond the District's boundaries. The District is therefore highly unsustainable in this particular respect.</p> <p>Suggest that in addition to employment growth</p>

	<p>stimulated via Thames Gateway South Essex and Southend Airport, smaller and more localised initiatives need to develop to reduce commuting time and reduce reliance on employment outside the district.</p> <p>Welcome the initiatives set out to deliver increased employment provision to meet the needs of the District and its growing population over the plan period.</p> <p>Suggest that housing and employment should be considered jointly to ensure the best possible "fit" which would encourage new and more accessible employment opportunities and improve the soundness of the Plan.</p>
--	--

London Southend Airport and Environs	
Agent	Summary of representation(s)
Strutt & Parker (Mr G Marshall)	<ul style="list-style-type: none"> • the airport is recognised as an important driver of inward investment and regeneration in the Thames Gateway; • the airport is potentially an excellent transport interchange with an airport railway station and six to ten rail services into London Liverpool Street per hour. The transport characteristics of the location will be enhanced with the advent of the station. in terms of enhanced bus service links with the station: • The airport currently has around 10 acres of land that it has earmarked for airport related development. 4.5 The airport together with the new rail station will become a significant catalyst for growth in this area. which is not fully recognised in the Preferred Options document. but which is a commercial inevitability based on the experience of airports elsewhere.

Preferred Option ED1 – London Southend Airport	
Agent	Summary of representation(s)
Firstplan (representing C&S Associates)	Supports JAAP. Important the the potential of the area is recognised in the Core Strategy and Policy ED1.
Iceni Projects Ltd (Colonnade Land LLP)	<p>Colonnade supports the identification of London Southend Airport in providing a significant role for the economic development of the District. The policy does not provide any indication of the number of jobs it will provide within the Plan period.</p> <p>Recommend Three Ashes as employment land connected to the Airport.</p>
Savills (Martin Dawn Plc)	<p>- Martin Dawn Plc [5263] (represented by Savills (Ms M Power) [8301]) SUPPORT Paper - 18/12/08 Core Strategy Preferred Options (Revised October 2008): ED1 London Southend Airport - Preferred</p>

	Option ED1 London Southend Airport Preferred Option S - 4440 - 5263 - ED1 London Southend Airport - Preferred Option -
Preferred Option ED2 – Employment Growth	
Agent	Summary of representation(s)
Kember Loudon Williams Ltd (representing Barratt Eastern Counties)	The preferred option is supported since it is important that the economy does not focus on a single employment provider in the form of an airport but diversifies.
Andrew Martin Associates Ltd (representing MD Smith & Son)	Policy ED2 should not discount the provision of alternative sites that would make use of previously developed land and could contribute towards sustainable employment opportunities, provided they would meet the general aims of policy ED4 as part of a mixed use development or for employment uses.
Iceni Project Ltd (representing Colonnade Land LLP)	Colonnade agrees that Rochford's economy must diversify and modernise through the growth of existing businesses and through the creation of new enterprises. The policies of the Green Belt chapter should reflect the requirement for Green Belt releases and in accordance with policy 2.12 of PPG2, consideration should be given to the identification of additional safeguarded land to meet employment and job targets to allow flexibility and ensure Green Belt policies do not put employment delivery at risk.
Countryside Properties (Southern) Ltd	This policy (or supporting text) gives no indication of intended employment delivery for the plan period
Bidwells (representing H R Philpot & Sons (Barleylands) Ltd)	Supports the opportunity of introducing new employment land within the district. Suggests that the proposed housing growth would deliver suitable infrastructure and community facilities as well as the employment growth target. Suggests that employment land allocation should be included in the Core Strategy Preferred Option stage to help ensure their achievability with regards to the housing development.

Alternative Option ED2 – Employment Growth	
Agent	Summary of representation(s)
Countryside Properties (Southern) Ltd	We support the principle/policy of providing a range of employment uses across the District rather than focus on provision purely at London Southend Airport.

Preferred Option ED3 – Existing Employment Land	
Agent	Summary of representation(s)
Christopher Wickham	The review of existing employment land requirements,

Associates (representing Inner London Group)	and the reallocation of sites for housing, where appropriate, is fully supported.
Kember Loudon Williams Ltd (Barratt Eastern Counties)	The policy is at odds with the wider objectives of Policy ED2 The alternative option should be considered more thoroughly

Preferred Option ED4 – Future Employment Allocations	
Agent	Summary of representation(s)
Andrew Martin Associates Ltd (representing M D Smith & Son)	Objects to policy
Iceni Projects Ltd (representing Colonnade Land LLP)	The policy indicates that only one new location for employment should be carried forward, located on land to the South of London Road, Rayleigh, and otherwise relies solely on the Airport to deliver the required employment land within the District. Three Ashes Farm provides an excellent opportunity to deliver employment growth in the short term. Cross-referencing to the Employment Land Study should be provided within this chapter in order to demonstrate that more information has been issued on the consideration of general locations for employment land.
Countryside Properties (Southern) Ltd	We support the principle of a new employment allocation west of Rayleigh.
Countryside Properties (Southern) Ltd	However, we consider that the future employment allocation be north of London Road, not south of London Road.

Alternative Option ED4 – Future Employment Allocations	
Agent	Summary of representation(s)
Countryside Properties (Southern) Ltd	We argue that an employment allocation north of London Road could be provided which is no closer to existing residential areas than any allocation south of London Road

Preferred Option ED5 – Eco Enterprise Centre	
Agent	Summary of representation(s)
Countryside Properties (Southern) Ltd	We support the proposal to develop an eco-enterprise centre or business incubation centre. However, the deliverability of an eco-enterprise centre will be a key issue.

Summary of Agents Comments on the Environmental Issues Chapter

Preferred Option ENV1 – Protection and Enhancement of the Natural Landscape and Habitats	
Agent	Summary of representation(s)
Colliers CRE (representing Aber Ltd)	It is important that development is directed away from the sites of international, national and local

	nature conservations importance and support the implementation of the Crouch and Roach Management Plans.
Edward Gittins & Associates (representing Crowstone Properties Ltd)	Support the continuing protection of the District's natural landscape and habitats. Endorse the Preferred Options in ENV1 and ENV2. Consider some of the protective notations are sufficiently important to be denoted on the Key Diagram.
Edward Gittins & Associates (representing Mr Dudley Ball)	Support the continuing protection of the District's natural landscape and habitats. Endorse the Preferred Options in ENV1 and ENV2. Consider some of the protective notations are sufficiently important to be denoted on the Key Diagram.

Preferred Option ENV2 – Coastal Protection Belt

Agent	Summary of representation(s)
Edward Gittins & Associates (representing Crowstone Properties Ltd)	Support the continuing protection of the District's natural landscape and habitats. Endorse the Preferred Options in ENV1 and ENV2. Consider some of the protective notations are sufficiently important to be denoted on the Key Diagram.
Edward Gittins & Associates (representing Mr Dudley Ball)	Support the continuing protection of the District's natural landscape and habitats. Endorse the Preferred Options in ENV1 and ENV2. Consider some of the protective notations are sufficiently important to be denoted on the Key Diagram.
Bidwells (representing H R Philpot & Sons (Barleylands) Ltd)	Suggests that the proposed location of the costal protection belt along part of the western boundary does not conform to the local topography and has therefore included land that could be considered for part development. At the detailed stage, the positioning of the coastal protection belt need to take into consideration a potential school and limited housing growth to the north west as indicated on the attached plan.

Preferred Option ENV3 – Flood Risk

Agent	Summary of representation(s)
Colliers CRE (represented Aber Ltd)	The approach to direct development away from areas at risk of flooding is supported.
Charles Planning Associates (Swan Hill Homes Ltd)	Swan Hill supports the preferred option approach towards dealing with settlements at risk of flooding
RW Land & Planning (JF Spencer & Son Ltd)	We welcome the proposal to pursue development in areas which fall into Flood Zone 1 and the use of the sequential test in PPS25.

Preferred Option ENV4 – Sustainable Drainage Systems (SUDs)

Agent	Summary of representation(s)
Charles Planning Associates Ltd (representing Swan Hill Homes Ltd)	In respect of Policy ENV4, Swan Hill supports the general principle of sustainable drainage systems. However, given the difficulties in transferring the future management and operation of SUDs to water companies and local authorities, it is not considered

	appropriate to require the provision of SUDS as a pre-requisite to development in all cases.
RW Land & Planning (Representing JF Spencer & Son Ltd)	SUDS is not always the best environmental option for dealing with drainage. We welcome the viability test intended to identify those sites where SUDS is not appropriate.

Preferred Option ENV5 – Air Quality

Agent	Summary of representation(s)
Iceni Projects Ltd (representing Colonnade Land LLP)	Colonnade support Rochford's aim of securing an Eco-Enterprise Centre within the District and consider Three Ashes to be an excellent location. This would provide a high-quality employment development that may also incorporate uses associated with the Airport. The site would further justify its sustainability benefits by being located within close proximity to the London Southend Airport Railway Station and Rochford Town Centre.

Preferred Option ENV6 – Large Scale Renewable Energy Projects

Agent	Summary of representation(s)
Colliers CRE (representing Aber Ltd)	With major developments the preparation of development briefs should include the requirement to address sustainable layouts and construction, together with the requirement for renewable energy, which dependent on the location should include amongst other things, wind energy, solar power and ground heat

Preferred Option ENV7 – Small Scale Renewable Energy Projects

Agent	Summary of representation(s)
Charles Planning Associates Ltd (representing Swan Hill Homes Ltd)	In respect of Policy ENV4, Swan Hill supports the general principle of sustainable drainage systems. However, given the difficulties in transferring the future management and operation of SUDS to water companies and local authorities, it is not considered appropriate to require the provision of SUDS as a pre-requisite to development in all cases.

Preferred Option ENV8 – Code for Sustainable Homes

Agent	Summary of representation(s)
Colliers CRE (representing Aber Ltd)	Combined with the use of renewable energy projects, this will assist in reducing carbon dioxide emissions from new residential developments.
Firstplan (representing Stolkin & Clements LLP)	Support this policy.
Charles Planning Associates (representing Swan Hill Homes Ltd)	However, Swan Hill consider the requirement to achieve Code level 6 by 2013 is unrealistic and whilst Swan Hill recognises the importance of this issue, and the desire for carbon neutral homes, producing this on all new dwellings by 2013 could have significant

	implications on the cost of developments, viability and deliverability.
Kember Loudon Williams Ltd (representing Barratt Eastern Counties)	<p>Object. The advice from the Department of Communities and Local Government is that the new requirement to have a rating against the Code does not make it mandatory to build a Code home or to have each new home assessed against the Code.</p> <p>Code 6 is unlikely to be unattainable given existing technologies and that achieving code 5 could result in a 12% to 20% increase in costs that would have to be passed onto the consumer.</p>
RW Land & Planning (representing JF Spencer & Son Ltd)	<p>There remains a doubt as to whether Code Level 6 is realistically achievable within the current timescales.</p> <p>Welcome the decision to not pursue the 10% renewable "Merton Rule" as piecemeal renewable energy production is not an efficient approach to its production.</p>

Summary of Agents Comments on the Transport Chapter

Transport - Introduction	
Agent	Summary of representation(s)
Croudace Strategic Ltd	Policy H2 does not accord with the statement that "the only long-term option for Rochford District is to try and reduce the need to travel by car and promote the use of alternative methods of transport".
Strutt & parker Ltd (representing Mr G Marshall)	Recommending a site for development on transport reasons.

Preferred Option T1 – Highways	
Agent	Summary of representation(s)
Colliers CRE (representing Aber Ltd)	Developments located in sustainable locations will assist in reducing the need to travel by private vehicles.
Croudace Strategic Ltd	The reference to locating development in such a way as to reduce reliance on the car accords with Government policy, but conflicts with Policy H2 which identifies land at Canewdon, a settlement with few services and poor public transport provision.
Charles Planning Associates (representing Swan Hill Homes Ltd)	<p>Swan Hill supports the overall objectives set out in Policy T1 requiring developments to be located and designed to reduce the reliance on the private car and to meet the infrastructure needs generated by development or seek to help achieve these needs is acceptable in principle.</p> <p>However, Swan Hill considers it important to emphasise that the developer's role should not be seen as a means to meet existing shortfalls in</p>

	provision.
RW Land & Planning (representing JF Spencer & Son Ltd)	Welcome the objective to locate and design housing developments that reduce the reliance on the private car.
Iceni Projects Ltd (representing Colonnade LLP)	Colonnade supports the principle of improving public transport provision and reducing reliance on the private car. However, it is to be noted that the Core Strategy provides no information on how surface access improvements are to be delivered to London Southend Airport, which is a fundamental caveat for the growth of the Airport, and therefore the District's employment strategy.
Edward Gittins & Associates (representing Crowstone Properties Ltd)	Fully endorse the Preferred Options in T1 Highways and T2 Public Transport.
Edward Gittins & Associates (representing Mr Dudley Ball)	Fully endorse the Preferred Options in T1 Highways and T2 Public Transport.

Preferred Option T2 – Public Transport

Agent	Summary of representation(s)
Croudace Strategic Ltd	The acknowledgement that development must be well related to public transport is welcomed, but does not accord with Policy H2.
Charles Planning Associates (representing Swan Hill Homes Ltd)	Supports policy.
RW Land & Planning (representing J F Spencer & Son Ltd)	Welcome the objective developments must be well related to public transport, or accessible by means other than the private car.
Iceni Projects Ltd (representing Colonnade Land LLP)	Colonnade supports the principle of improving public transport provision and reducing reliance on the private car. The transport and infrastructure implications of the Airport deserve further scrutiny within the Core Strategy.
Mr David Grew (representing Mr David Grew)	Suggests H2 is in direct conflict.
Edward Gittins & Associates (representing Crowstone Properties Ltd)	Fully endorse the Preferred Options in T1 Highways and T2 Public Transport.
Edward Gittins & Associates (representing Mr Dudley Ball)	Fully endorse the Preferred Options in T1 Highways and T2 Public Transport.

Preferred Option T4 – Travel Plans

Agent	Summary of the comment
Charles Planning Associates (representing Swan Hill Homes Ltd)	Supports the policy.

Preferred Option T5 – Cycling and Walking

Agent	Summary of representation(s)
Charles Planning Associates (representing Swan Hill Homes Ltd)	Supports the policy. Site by site assessment is an important consideration.
Strutt & Parker (representing	Peggle Meadow could contribute to the extension of

Mr G Marshall)	the Prittle Brook Greenway so that it may continue across the borough boundary and link through to further areas of employment and to Rochford Town Centre. It is noted from the Preferred Options diagram that the Prittle Brook Greenway proposal does indeed follow the route through the site that has previously been demonstrated to both Rochford and Sustrans, but does not indicate the site it passes through as being a Preferred Option. Without the release of Peggie Meadow, this route option therefore becomes undeliverable.
Edward Gittins & Associates (representing Crowstone Properties Ltd)	Attention is drawn to the particular opportunities associated with the inclusion of the western side of Ashingdon.
Preferred Option T5 – Cycling and Walking	
Agent	Summary of representation(s)
Charles Planning Associates (representing Swan Hill Homes Ltd)	Supports the policy. Site by site assessment is an important consideration.
Strutt & Parker (representing Mr G Marshall)	Peggie Meadow could contribute to the extension of the Prittle Brook Greenway so that it may continue across the borough boundary and link through to further areas of employment and to Rochford Town Centre. It is noted from the Preferred Options diagram that the Prittle Brook Greenway proposal does indeed follow the route through the site that has previously been demonstrated to both Rochford and Sustrans, but does not indicate the site it passes through as being a Preferred Option. Without the release of Peggie Meadow, this route option therefore becomes undeliverable.
Edward Gittins & Associates (representing Crowstone Properties Ltd)	Attention is drawn to the particular opportunities associated with the inclusion of the western side of Ashingdon.

Preferred Option T7 – Parking Standards	
Agent	Summary of representation(s)
Charles Planning Associates (representing Swan Hill Homes Ltd)	Policy should state that the council have adopted supplementary guidance on parking standards.
Planning Potential (representing Fairview New Homes)	Lack of coherence with PPG13 in that parking standards should not be expressed as minimum.

Andrew Martin Associates Ltd (Representing MD Smith & Son)	standards should confirm with PPG13 and not expressed as minimum values. Alternative and sustainable transport options including cycleway and public transport options could justify a lower parking standard and promote sustainable transport options.
Iceni Projects Ltd (Representing Colonnade Land LLP)	Policy must reflect PPG13 to promote sustainable transport choices.

Summary of Agents Comments on the Retail and Town Centres Chapter

Retail and Town Centres – Retail	
Agent	Summary of representation(s)
Indigo Planning (representing Sainsbury's Supermarkets Ltd)	Sainsbury's are interested in pursuing opportunities in the District having identified a requirement to improve foodstore provision. The Council should be more realistic about retail capacity in order to address the issue of leakage and to ensure expenditure is retained within the District.

Preferred Option RTC1– Retail	
Agent	Summary of the comment
RW Land & Planning (representing J F Spencer & Son Ltd)	Welcomes the designation of Hockley as a district centre and that retail developments will be focussed towards it.

Preferred Option RTC5 – Hockley Town Centre	
Agent	Summary of representation(s)
RW Land & Planning (representing JF Spencer & Son Ltd)	Welcomes the proposals contained within this policy for the improvement of facilities, services and town centre living within Hockley Town centre.

Summary of Agents Comments on the Character of Place Chapter

Preferred Option CP1 – Design	
Agent	Summary of representation(s)
Colliers CRE representing Aber Ltd	New developments should promote good, high quality design.
Charles Planning Associates representing Swan Hill Homes Ltd	Policy CP1 seeks to ensure the provision of good, high quality developments that reflect local characteristics and distinctiveness, this ideology is supported by Swan Hill.
Iceni Projects Ltd representing Colonnade Land LLP	The Council should not seek to impose further demands on developers where existing regulations provide sufficient requirements regarding design. In this instance, Design and Access Statements provide sufficient design guidelines for developments.
Savills (Representing Martin Dawn Plc)	Agree that high quality design should be promoted in all developments in accordance with Government objectives.

Summary of Agents Comments on the Community Infrastructure, Leisure and Tourism Chapter

Community Infrastructure, Leisure and Tourism	
Agent	Summary of representation(s)
Strutt & Parker (representing G Marshall)	Promoting site on basis of services in close proximity
Edward Gittins & Associates (representing Crowstone Properties Ltd)	We support the Council's aims to promote and secure a vibrant and prosperous countryside and one that encourages recreational uses
Edward Gittins & Associates (representing Mr Dudley Ball)	We support the Council's aims to promote and secure a vibrant and prosperous countryside and one that encourages recreational uses.

Preferred Option CLT1 – Planning Obligations and Standard Charges	
Agent	Summary of representation(s)
Colliers CRE (representing Aber Ltd)	Planning obligations and standard charges to ensure a reasonable and appropriate contribution is supported.
Charles Planning Associates (representing Swan Hill Homes Ltd)	Swan Hill generally supports the overall approach the Council has taken in Policy CLT1.
Kember Loudon Williams Ltd (representing Barratt Eastern Counties)	Contributions should not be used to make good existing deficiencies in infrastructure provision. Nor are they to be used to secure contributions to the achievement of wider planning objectives that are not necessary for consent to be granted. In that context the Core Strategy should set this out as its policy framework.
RW Land & Planning (representing J F Spencer & Son Ltd)	We welcome the continued use of Planning Obligations to secure reasonable on and off site improvements as set out in Circular 05/2005.
Iceni Projects Ltd (representing Colonnade Land LLP)	The principle of providing for planning gain associated with new development proposals is widely accepted The policy should refer to guidance contained within a Supplementary Planning Document (SPD) and should allow for flexibility to acknowledge reasonable negotiation on s106 agreements to ensure development proposals continue to come forward thereby contributing to deliverability, whilst allowing realistic reductions for marginal schemes.
Savills (representing Martin Dawn Plc)	- Martin Dawn Plc [5263] (represented by Savills (Ms M Power) [8301]) COMMENT Paper - 18/12/08 Core Strategy Preferred Options (Revised October 2008): CLT1 Planning Obligations and Standard Charges - Preferred Option We understand the need for consistency in calculating planning charges, however, are concerned that the standard formula referred to in Policy CLT1 does not allow for flexibility dependant on individual site circumstances. The policy states that the requirement to pay standard charges may be reassessed and modified where actual provision of infrastructure or facilities is provided as part of the development. Whilst I agree with this, there needs to be a further comment that where the developer can demonstrate

	that certain charges are economically unviable there is the potential for negotiation. C - 4445 - 5263 - CLT1 Planning Obligations and Standard Charges - Preferred Option -
Sellwood Planning Ltd (representing Aston Unit Trust and J Needs)	Policy CLT1 is supported as both justified and supportable in the context of delivering the social and physical infrastructure necessitated by growth in the plan area to 2021 and beyond.

Preferred Option CLT3 – Secondary Education	
Agent	Summary of representation(s)
Colliers CRE (representing Aber Ltd)	It is important for King Edmund School to expand to accommodate the proposed new dwellings in Ashingdon.
Andrew Martin Associates (representing A W Squier Ltd)	No objection is raised to the principle of expanding King Edmund school.

Preferred Option CLT5 – Open Space	
Agent	Summary of representation(s)
Charles Planning Associates (representing Swan Hill Homes Ltd)	Swan Hill supports the need for new residential developments to incorporate a degree of new publicly accessible open space. Standard Charges should be based on thorough public consultation and consideration and sound justification.
Planning Potential (representing Fairview New Homes)	Fairview New Homes strongly object to the requirements set out in preferred Policy CLT5. Whilst the sentiments of the policy are well founded and it is recognised that there is a need to provide public open space throughout the Borough, there is no justification as to why a significant amount of public space will be required in the west of Rayleigh.
Edward Gittins & Associates (representing Crowstone Properties Ltd)	Suggest there are opportunities for providing Open Space for both formal and informal recreation in association with General Locations especially on the edge or within the Green Belt particularly opportunities on the western side of Ashingdon.
Edward Gittins & Associates (representing Mr Dudley Ball)	Suggest there are opportunities for providing Open Space for both formal and informal recreation in association with General Locations especially on the edge or within the Green Belt.
Bidwells (representing H R Philpot & Sons (Barleylands) Ltd)	Supports CLT5. Suggests that the Council should carry out an assessment for existing open space where new strategic development is proposed. Suggests that appropriate strategic planting should be introduced to ensure conformity with green belt release, along with other green infrastructures in Hullbridge.

Preferred Option CLT6 – Community Facilities	
Agent	Summary of the comment
Charles Planning Associates (representing Swan Hill Homes Ltd)	Supports the policy particular in relation to Great Wakering.

Preferred Option CLT7 – Play Space	
Agent	Summary of representation(s)
Charles Planning Associates (representing Swan Hill Homes Ltd)	Supports policy but it should be based on thorough public consultation and consideration and sound justification.

Preferred Option CLT8 – Youth Facilities	
Agent	Summary of the comment
Charles Planning Associates (representing Swan Hill Homes Ltd)	Supports policy but it should be based on thorough public consultation and consideration and sound justification.

Preferred Option CLT10 – Playing Pitches	
Agent	Summary of representation(s)
Charles Planning Associates (representing Swan Hill Homes Ltd)	Supports policy but it should be based on thorough public consultation and consideration and sound justification.

Summary of Agents Comments on the Upper Roach Valley and Wallasea Island Chapter

Preferred Option URV1 – Upper Roach Valley	
Agent	Summary of representation(s)
Croudace Strategic Ltd	It is wholly unrealistic to suggest that such a large area of land could be Compulsorily Purchased and thus this approach is highly unlikely to achieve the objectives of this policy.
Whirledge and Nott (representing Rankin Farms)	Object to expansion by Compulsory Purchase
Whirledge & Nott (representing Mr Roger Smith)	We object to the proposal to expand Cherry Orchard Jubilee Country Park by compulsory purchase where necessary. This area should be maintained as a farmed landscape with enhanced association with the park area by negotiation.

Summary of Agents Comments on the Implementation, Monitoring and Delivery Chapter

Implementation Delivery and Monitoring	
Agent	Summary of representation(s)
Croudace Strategic Ltd	This section should give examples of other ways land can be acquired to expand the Country Park, and the way land can be acquired at all preferred locations.