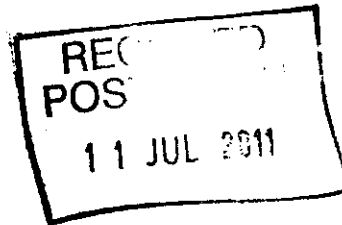


[REDACTED]

Sam Hollingworth
Planning Policy Team Leader
Rochford District Council
Council Offices
South Street
Rochford
Essex
SS4 1BW



8 July 2011

DC/08/256/01
BY POST/EMAIL

Dear Mr Hollingworth,

**ROCHFORD CORE STRATEGY
CONSULTATION ON SUSTAINABILITY APPRAISAL ADDENDUM – JUNE 2011**

We write further to the invitation to provide comments on the Rochford Core Strategy (CS) Sustainability Appraisal (SA) Addendum June 2011. We are grateful for an opportunity to provide comments on the document.

This response is written following a review of the correspondence exchanged between the Council and the Planning Inspectorate regarding the need to address the flaws in the previous SA work undertaken by the Council. We believe from reading the officer report that accompanied the Planning and Transportation Executive Decision of 18 May 2011 that our letter of 7 April 2011 addressed to Mr Scrutton prompted the Council to seek to address the flaws in the SA through the production of an Addendum.

It is unfortunate that our previous attempts to highlight the failings of the CS and SA were not addressed sooner, as we consider the production of an addendum to the SA to be an inadequate response particularly where it seeks to address matters that go to the heart of the CS (and which took up a significant proportion of the Examination hearing sessions) namely the housing and Green Belt strategy. It remains the case of CLLLP that the cumulative effects of the changes that would be required to the CS arising from an objective assessment of these matters are too extensive to be dealt with through modifications to the CS and should result in its withdrawal and resubmission.

We note the advice of the Inspector in her letter of 11 May 2011 that further work on the SA 'must not be undertaken as an exercise to justify a predetermined strategy'.

We are concerned by the content and outcomes of the SA Addendum as it appears to completely contradict the advice of the Inspector and fails to offer a fully objective review of the reasonable alternatives and why they are not considered to be the best option.

Furthermore, the reasons for rejection of East Rochford in the SA Addendum fail the important proviso test set out in paragraph 17 of the Forest Heath judgment, which requires the reasons for the rejection of alternatives to be 'still valid if there has been a change in the proposals in the draft plan or other material change of circumstances'. We consider the detailed matters that lead us to the above conclusion below.

Cont.2...

[REDACTED]

However, before considering these detailed matters, it is significant that CLLLP has actively engaged in the CS production process, through representations to the pre-submission consultations through to attendance of the various examination hearing sessions.

Throughout the course of this engagement, CLLLP has sought to promote East Rochford as a suitable location for housing growth. It has identified weaknesses in the Council's evidence base and SA process that are considered to render the CS unsound and has brought these matters to the attention of the Council, including the submission of two legal opinions on the soundness of the CS. It also considers the dismissal of East Rochford as a housing location in the Preferred Options CS on the grounds of comparison against only one of the preferred options (West Rochford), as is clarified in Policy H2 – Alternative Options, fails to meet the requirements of PPS12 to demonstrate that the plan is the most appropriate having gone through an objective process of assessing the alternatives. The failure to assess East Rochford against the other preferred options confirms that the assessment undertaken by the Council is narrow and artificially constrained.

a. Material change of circumstances

The SA Addendum fails to clarify when the reasonable alternatives were considered or when the selection/rejection process was undertaken. It is therefore difficult to determine precisely when the Council became aware of a number of material changes of circumstance regarding East Rochford as a general housing growth location.

However, set out in Appendix 1 are a series of the key relevant dates which illustrate the course of events that confirm that a material change of circumstances occurred during the production of the CS that should have resulted in reassessment of East Rochford as a reasonable alternative.

In short, CLLLP identified the area of land upon which it intended to seek planning permission for development in the application submission in September 2009. The application was determined at the 19 November 2009 Development Control Committee. The officer report to committee identified four reasons for refusal, none of which related to the purported reasons for dismissing East Rochford as a suitable location for housing development. Following the submission of the appeal against the decision to refuse planning permission the Council wrote to the Planning Inspectorate to confirm the withdrawal of two of the reasons for refusal (reasons 3 & 4).

Specifically, the remaining reasons for refusal of the planning application did not cite:

- The effect of the proposed development on the Special Landscape Areas (see Housing Audit Trail and Fig 8 of SEA Baseline Information Profile 2007-2008);
- The effect of the proposed development on the Landscape Character Areas, as identified within the 2003 Landscape Character Assessment (see Housing Audit Trail, Table 6 of SEA Baseline Information Profile 2007-2008 and the location of various other Broad Locations including East Ashingdon, South East Ashingdon, Canewdon, West Hockley, Hullbridge and West of Rayleigh);
- Highway matters, either in terms of capacity or effect on the Rochford Conservation Area (see Housing Audit Trail);
- Loss of agricultural land (noting that the Housing Audit Trail identifies land to the East of Rochford as predominantly Grade 1); or
- Noise pollution (see Housing Audit Trail).

The Core Strategy was submitted to the Secretary of State on 14 January 2010.

The Council and CLLLP agreed a Statement of Common Ground (SoCG) on 5 February 2010 and an addendum SoCG on 13 April 2010. In combination, these documents established, inter alia, that:

- The site lies wholly within Flood Zone 1 and its development for residential use is acceptable in flood risk and drainage terms subject to the imposition of conditions;

- The site is capable of accommodating the uses as proposed in the appeal scheme;
- The proposed development of Coombes Farm would not put Rochford at risk of merging with another town;
- ECC Highways have no objection to the proposals subject to the imposition of conditions and financial contributions;
- The proposed increase in traffic as a result of the development would not cause any roads or junctions to exceed capacity (save for the junction at Southend Road);
- Works to the Southend Road junction can be secured by means of conditions and/or legal agreement as appropriate;
- The existing road and junction network can satisfactorily accommodate the increase in traffic which is predicted from the proposed development;
- The fact that traffic volume may increase within the centre of Rochford (including the Conservation Area) is not considered of sufficient concern to warrant refusal of the development;
- Rochford Council has raised no fundamental objection to the proposals on the grounds of air quality impact subject to securing mitigation and monitoring by means of conditions;
- There are no in principle objections in relation to trees and landscaping. It is agreed that detailed proposals, measures for protection and construction methodology will be required;
- In principle, the proposed scale of development of 1-3 storeys or a max height of 12 metres, in accordance with the proposed parameters is considered to be acceptable and in keeping with the surrounding context, subject to the proportion of 1-3 storeys proposed in relation to the overall quality of urban design achieved on the site and with regard to the surrounding green belt and residential context;
- The levels of noise that future residents of the site would experience resulting from existing air traffic or any other existing noise source is not considered to be unacceptable such that the refusal of planning permission is warranted; and
- The air quality that future residents of the site would experience is not considered to be unacceptable such that the refusal of planning permission is warranted.

It is clear from the above that there was a significant material change in circumstances regarding the potential development of land within East Rochford during the course of the preparation of the CS.

It is our contention, therefore, that the summary appraisal of the alternative general housing locations contained within the SA Addendum has failed to take account of the material change in circumstances of land available for development in East Rochford.

The Council has been kept fully informed of the material changes in circumstance.

b. Detailed Critique of SA Addendum

With the above in mind, we turn to consider the matters of detail arising from the SA Addendum.

i. Introduction

Paragraph 1.3 states that "Enfusion... .. new case law arising from this ruling." It is concerning that the case referred to by the consultant engaged to undertake the SA Addendum and previous versions of the SA considers this case of such significance to necessitate a review of the SA. We consider the judgment reflects the logical reading of the requirements of the SEA Directive, rather than a fresh interpretation of the Directive. This implies that the requirements of the SEA Directive were neither properly understood nor applied in the previous SAs of the CS. It is unfortunate that the submissions of CLLLP, which sought clarification of the assessment of alternatives, were not therefore addressed by the Council at an earlier date.

Paragraph 1.4 confirms that the SA Addendum "...provides a summary of the alternatives considered throughout the production of the plan setting out the reasons for selecting/rejecting those alternatives" but fails to specify when these alternatives were considered or by whom or when the selection/rejection process was undertaken and by whom. These questions are not answered in paragraph 2.2 where a similar wording is used.

It is the contention of CLLLP that the consideration of alternatives in accordance with the requirements of the SEA Directive (and PPS12) was missing during the production of the CS, as clarified by the Policy Officer in evidence to the Coombes Farm inquiry, and the selection/rejection process was undertaken by Council Officers and Members in confidential sessions of the LDF Sub-Committee of 1 April 2009.

Helpfully, paragraph 1.4 goes on to confirm that the SA Addendum "also includes consideration of more detailed housing locations (than previously appraised)", which confirms the contention of CLLLP that the previous SAs did not consider the reasonable alternatives, but merely considered the preferred strategy adopted by the Council in confidential sessions of the LDF Sub-Committee of 1 April 2009.

ii. Summary review of alternatives assessment

Paragraph 2.5 states that "SA/SEA reports including the consideration of alternatives have been prepared and made available for public consultation at each stage." This does not confirm that the SA considered each of the reasonable alternative housing growth locations against the preferred options. Indeed, paragraph 4.2 of the officer report to the 9 February 2009 LDF Sub-Committee confirms that:

"The sustainability appraisal assessed each of the preferred options against a number of sustainability criteria, including their cumulative effects. In summary, the sustainability appraisal found that the Core Strategy Preferred Options would make a significant contribution to sustainability in the District, with a particularly strong focus on meeting housing and community needs, enhancing accessibility and protecting the District's natural environment. The key negative effects identified relate to proposals determined at a higher level – increased housing and employment development, and the expansion of London Southend Airport. Whilst it is recognised that these actions have been determined at a higher policy level (i.e. the East of England Plan), the consultants made further recommendations to assist the Council in mitigating the negative effects and enhancing the positive opportunities of this development for the District." [our emphasis]

It would appear to be clear from the above that the SA did not consider the reasonable alternatives, but considered the preferred options chosen by the Council in isolation.

iii. Further appraisal of alternatives: general housing development locations

Paragraphs 3.1 and 3.2 confirm that once the Council had established the preferred distribution of housing in general terms it identified the broad locations and from these it identified its preferred options. These preferred options were presented in the Revised PO CS, which was subject to SA. It is significant that the reasonable alternatives dismissed by the Council were not subject to detailed assessment under the SA at any stage in the production of the CS. In short, the SA process was used by the Council to verify its preferred options, rather than to test the options against the reasonable alternatives.

It has been established that material changes in circumstance have occurred during the preparation of the CS. It is not clear whether these material changes in circumstance were considered by the Council. It is clear that they could not be considered by the SA, as the reasonable alternatives were not considered during the course of the CS production process.

Cont.5...

Paragraph 3.2 refers to the decision to 'further develop this appraisal, considering the more detailed locations for development within individual top and second tier settlements' in the context of the Forest Heath judgment. The clear implication of this being the recognition by the Council, and by extension the consultant undertaking the SA, that the previous SA process was flawed. It is also immediately clear that the "development" of the appraisal has only occurred after the Forest Heath judgment in March 2011, and not at a formative stage in the preparation of the CS. This is of critical importance.

Paragraph 3.2 also refers to the 'further consideration of the realistic locations for development' that was enabled following the publication in February 2010 of the LDF Allocations DPD Discussion and Consultation Document 'as it incorporates the findings of the call for sites process and Strategic Housing Land Availability Assessment (SHLAA)'. This confirms that:

- a. The criticisms regarding the adequacy and timing of the SHLAA production process were well founded when they were made (representations to pre-submission CS, response to the Matters and Issues and Counsel Opinions);
- b. That these criticisms were not acted upon; and
- c. Some material changes have been taken into account in the SA Addendum, in this case the production of the LDF Allocations DPD Discussion and Consultation Document and the SHLAA, but significantly not the detailed consideration of Coombes Farm through the planning application process and the implications that this had on the reasons cited for the dismissal of East Rochford as a broad location for housing growth (noting the concerns regarding the consideration of East Rochford against West Rochford rather than all other preferred options, the issue of transport having been addressed during the consideration of the Coombes Farm planning application).

It is noted that the LDF Allocations DPD Discussion and Consultation Document is itself predicated on the preferred options in the CS, and therefore there is considerable doubt as to what assistance it can provide in assessing the policy choices made in the CS.

Paragraph 3.3 states that 'Detailed appraisals were undertaken for each of the top and second tier settlements and Canewdon'. In the context of the above, this paragraph should clarify that the detailed appraisals 'have been undertaken in the SA Addendum'.

There are a number of specific concerns regarding the rigour, consistency and clarity of the assessment of the housing development options for Rochford/Ashingdon in Table 3.1, which are illustrated below. However, before considering these issues, the failure to identify a methodology for the scoring or weighting of the assessment undermines the process significantly. Without providing readers of the SA Addendum with a clear and unambiguous explanation of the scoring and weighting, there is a very real risk that the assessment will fail to be truly objective. We have identified a number of examples where we consider the assessment to have failed to offer an objective assessment of the evidence base, including the following:

- Under the assessment of Locations 5 and 6 reference is made to their relationship to King Edmund School as a benefit of the proposed locations. Reference is then made to the relationship of Locations 2, 3 and 4 in delivering improvements to King Edmund School and community benefits similar to South East and East Ashingdon, yet there is no reference in the assessment of Location 1 to the contribution it will make to the improvements to King Edmund School and community benefits similar to South East and East Ashingdon;
- Specific reference is made under the assessment of Location 5 to enabling 'a significant amount of development to be accommodated in a manner which does not entail development projecting out into the open countryside'. This is a subjective statement that is not applied to the assessment of the other locations, most notably to Location 1, which would involve a very significant incursion into the open countryside;

- The assessment of Location 3 states that 'Whilst a small quantum of development may be accommodated within this general location avoiding land subject to physical constraints, such an approach is less likely to deliver community benefits', yet the assessment of Location 3 in Appendix 1 of the SA Addendum states that the 'quantum of development that can be delivered in this [East Rochford] location provides sufficient economies of scale to fund/develop facilities required by the community' and goes on to state that it 'Would also contribute to regeneration in Rochford'. This demonstrates the lack of consistency in the SA Addendum;
- The assessment of Location 3 also refers to matters relating to highways and transport as counting against the location, yet the planning application at Coombes Farm clearly established that there was no objection from the statutory highway authority nor were there any highways matters of sufficient concern to warrant refusal of the development;
- Again, the sustainability of the location is only assessed as against West Rochford (Location 1), which is a fundamental error that results in the exclusion of Location 3 without proper consideration against all the other options for housing development.

iv. Further appraisal of alternatives: general employment development locations

The assessment of general employment locations also throws up a number of inconsistencies. In particular, we are concerned to note that the assessment of South Rochford (east of Airport) states that it 'could include the expansion of the existing industrial estate (Purdeys), but the release of additional Green Belt land in this location is not supported by the Employment Land Study'. This appears to differ from the view in paragraph 11.32 of the Submission CS and in several locations in the Employment Land Review, which confirm that Purdey's Industrial Estate 'is a fit-for-purpose industrial estate which is in a good condition. The site should be maintained and, if possible, expanded'. Again this demonstrates a lack of consistency and clarity in the assessment process.

v. Appendix 1: Housing development options for Rochford/Ashingdon

The assessment of Location 3 in the detailed appraisal matrices at Appendix 1 is similarly flawed. The number of flaws and their cumulative effects render the assessment of the whole invalid and we note the following issues, which are of particular concern:

- The reference to the location of development in the flight path of London Southend Airport in the context of the findings of the Coombes Farm application;
- The reference to noise and air pollution in the context of the findings of the Coombes Farm application;
- The reference to increased traffic congestion in Rochford Town Centre in the context of the findings of the Coombes Farm application;
- The reference to Purdeys Industrial Estate in the context of paragraph 11.32 of the Submission CS and the findings of the Employment Land Review;
- The reference to the Crouch and Roach SPA and Ramsar site due to recreational disturbance in the context of the findings of the Coombes Farm application;
- The reference to the effect on the landscape character in the context of the findings of the Coombes Farm application; and
- The reference to the grade 1 agricultural land in the context of the findings of the Coombes Farm application.

The summary assessment then goes on to identify the noise and safety concerns, traffic, congestion, noise and air pollution, biodiversity, water and the SPA. As established above, each of these issues have been addressed in the Coombes Farm planning application process.

c. Conclusions

It follows from the above that CLLLP considers the SA Addendum to be wholly insufficient and contrary both to the advice of the Inspector and guidance from the Government, as it is merely 'an exercise to justify a predetermined strategy'.

As a result, if the CS is adopted on the basis of this SA Addendum we consider that it will be unlawful. The entire purpose of the SEA Directive and Regulations is for alternatives to be assessed at a formative stage as part of an iterative plan making process: see e.g. the DCLG Plan Making Manual and Forest Heath at [17].

The cumulative effects of the changes that would be required to the CS arising from a truly objective assessment of the matters raised by CLLLP and others during the course of consultation and examination are too extensive to be dealt with through modifications to the CS, or through a contrived Addendum to the SA.

CLLLP maintains that the only course of action that will address these wide ranging and significant objections is the withdrawal and resubmission of the CS. Furthermore, the reason for undertaking the SA Addendum was to respond to the findings of the Forest Heath judgment.

Unfortunately the SA Addendum fails to achieve this aim, as it continues the failure to objectively assess reasonable alternatives and fails to take account of a number of material changes of circumstances.

Rather than providing further clarity, the SA Addendum leaves a significant number of questions unanswered and exposes the fact that the requirements of the SEA Directive were neither properly understood nor applied in the previous SAs of the CS.

Finally, we confirm that we reserve the right to show correspondence relating to the matters raised by this letter to the Court at a subsequent date.

Yours sincerely

[Redacted signature]

[Redacted signature]

cc.

[Redacted list of recipients]

Appendix 1: Formal Correspondence between IcenI Projects and Rochford District Council

Date	From	To	Re:
26.06.07	Ian Anderson-Iceni	Shaun Scrutton-RDC	Representations to the Rochford CS Preferred Options on behalf of Seaside Ltd.
10.07.08	Zoe Dillon- Iceni	Shaun Scrutton-RDC	Following a meeting between RDC and Ian Anderson on 04.07.08, letter sets out the clients intentions for the site.
29.08.08	Zoe Dillon- Iceni	Shaun Scrutton-RDC	Request for Screening Opinion for potential application at Coombes Farm.
17.10.08	Shaun Scrutton-RDC	Zoe Dillon- Iceni	Response to request for Screening Opinion in relation to Coombes Farm confirming an EIA is required.
11.11.08	Sam Hollingworth-RDC	Zoe Dillon- Iceni	Request for information as set out in the evidence base of the CS Preferred Options stage.
13.11.08	Zoe Dillon- Iceni	Sam Hollingworth-RDC	Correspondence relating to request of details of evidence base of CS Preferred Options stage (Request for further information).
17.11.08	Sam Hollingworth-RDC	Zoe Dillon- Iceni	Response to questions as set out in letter of 11.11.08 relating to CS Preferred Options stage.
28.11.08	Sam Hollingworth-RDC	Zoe Dillon- Iceni	In response to letter 13.11.08 requesting details of evidence base of CS Preferred Options stage.
28.11.08	Zoe Dillon- Iceni	Sam Hollingworth-RDC	Confirmation of receipt of RDC letter of 13.11.08 and request for further information in regard to the evidence base to fully understand the figures set out in the CS Preferred Options stage.
01.12.08	Zoe Dillon- Iceni	Shaun Scrutton-RDC	Submission of Scoping Report in relation to request for Scoping Opinion for planning application at Coombes Farm.
09.12.08	Sam Hollingworth-RDC	Zoe Dillon- Iceni	Response to request of details of evidence base in relation to CS Preferred Options.
17.12.08	Zoe Dillon- Iceni	Katie Rodgers- RDC	Response to email of 16.12.08, confirming that the proposed response date of 26.01.09 in relation to the Scoping Opinion for the Coombes Farm application was acceptable.
17.12.08	Zoe Dillon- Iceni	Sam Hollingworth-RDC	Representations to CS Preferred Options DPD .
30.01.09	Shaun Scrutton-RDC	Zoe Dillon- Iceni	Provisional scoping opinion for application at Coombes. Farm.
11.02.09	Zoe Dillon- Iceni	Shaun Scrutton-RDC	Response to RDC letter of 30.01.09 setting out provisional scoping opinion for application at Coombes. Farm.
06.03.09	Shaun Scrutton-RDC	David Churchill-Iceni	Coombes Farm Scoping Opinion.
15.04.09	Alison Coster-Iceni	Sam Hollingworth-RDC	Submission of Coombes Farm as part of RDC SHLAA.

01.09.09	David Churchill-Iceni	various	Letter informing officers in various departments and Councillors of Rochford District Council of the forthcoming application at Coombes Farm.
04.09.09	David Churchill-Iceni	Katie Rodgers- RDC	Coombes Farm planning application- Submission.
17.09.09	Shaun Scrutton-RDC	CLLLP (C/O Iceni)	Coombes Farm planning application- Confirmation of registration.
14.10.09	David Churchill-Iceni	Sam Hollingworth-RDC	Representations to CS submission September 2009. Plan considered to be unsound.
21.10.09	Katie Rodgers-RDC	David Churchill-Iceni	Coombes Farm planning application- Following meeting with RDC on 12.10.09, proposed list of s106 Heads of Terms set out.
23.10.09	Sonia Worthington-RDC	James Brown- Iceni	Coombes Farm planning application- Confirmation that arrangements have been made for a site visit.
03.11.09	James Brown-Iceni	Katie Rodgers- RDC	Coombes Farm planning application- Response to a number of issues raised in relation to the application.
16.11.09	David Churchill-Iceni	Katie Rodgers- RDC	Coombes Farm planning application- Request that RDC confirm Natural England's letter and that there are no longer any grounds to include biodiversity as a reason for refusal.
03.03.10	David Churchill-Iceni	Lissa Higby- Programme officer	Reps to pre-examination hearing of CS. Considered to be unsound for a number of reasons. Examination should be suspended in order for necessary works to be carried out.
19.03.10	Head of Legal, Estates and Members Services- RDC	David Churchill-Iceni	Further to meeting on Wednesday seeking outline grounds on which Iceni are seeking costs of around £250,000 in regard to Coombes Farm inquiry in the event that the five year housing supply element was not withdrawn from RDCs case.
26.03.10	David Churchill-Iceni	Lissa Higby- Programme officer	Representations to the draft CS Matters and Issues.
19.04.10	Jody Owens-Hughes- RDC	David Churchill-Iceni	Invitation to Affordable Housing Viability Workshop.
20.04.10	David Churchill-Iceni	Lissa Higby- Programme officer	Submission CS- Further representation relating to the final list of matters and issues, including material presented at Coombes Farm inquiry.
29.04.10	David Churchill-Iceni	Sam Hollingworth-RDC	LDF Allocations DPD discussion and consultation document- representations outlining why Coombes Farm should be included as a suitable location for growth.
26.05.10	David Churchill-Iceni	Lissa Higby- Programme officer	Confirmation of Lissa Higby providing detail of correspondence with EA. In light of this, RDC has failed to take account of the need to avoid flood risk and other natural hazards in regard to proposed development at Stambridge Mills.
18.06.10	David Churchill-Iceni	Shaun Scrutton-RDC	Representations made in regard to the application for planning permission at Hall

			Road. The application should be refused.
08.07.10	Alison Coster-Iceni	Judith Adams- RDC	Application for residential development at land north of Hall Road. Following discussions with David Churchill, 23 copies of representations submitted by Iceni enclosed in letter.
19.07.10	David Churchill-Iceni	Lissa Higby- Programme officer	In response to letter by inspector regarding the impact of the revocation of RSs on CS. Urge the postponement of Examination.
18.10.10	Shaun Scrutton-RDC	David Churchill-Iceni	Invitation to put forward views on the CS Submission Document.
26.11.10	David Churchill-Iceni	Sam Hollingworth-RDC	In response to letter of 18.10.10- consultation on proposed changes to CS. Should be held in abeyance until the evidence base is made sound.
09.12.10	David Churchill-Iceni	Kerry Freeman-RDC	Freedom of Information Request for various reports.
20.01.11	Shaun Scrutton-RDC	David Churchill-Iceni	Request for further time to provide the information within FOI request of 09.12.10.
27.01.11	David Churchill-Iceni	Lissa Higby- Programme officer	Letter in response to correspondence re: the FOI request and revocation of EEP I relation to Rochford CS Examination.
27.01.11	David Churchill-Iceni	Shaun Scrutton-RDC	Response to Shaun Scruttons letter of 20.01.11, regarding the RDC response to the FOI request of 09.12.10. Concern expressed at the length of time to respond, and justification for the FOI.
31.01.11	David Churchill-Iceni	Lissa Higby- Programme officer	Confirm disappointment that further representations cannot be made on the basis of Cllr John Mason's letter.
31.01.11	Lissa Higby- Programme officer	David Churchill-Iceni	Response from inspector in relation to FOI request. Criticism of date of request for further written submissions.
02.02.11	David Churchill-Iceni	Shaun Scrutton-RDC	Response to letter of 31.01.11 refusing to publish FOI request. Further request for internal review to reconsider request.
18.02.11	Lissa Higby- Programme officer	David Churchill-Iceni	Response to FOI request, previous response by Shaun Scrutton on 20.01.11, and the letter from David Churchill of 27.01.11.
18.02.11	Deputy Chief Executive- RDC	David Churchill-Iceni	Acknowledgement of FOI request set out in letter of 09.12.10.
18.02.11	Deputy Chief Executive- RDC	David Churchill-Iceni	Response to FOI request set out in letter of 09.12.10.
24.02.11	David Churchill-Iceni	Lissa Higby- Programme officer	Rochford Core Strategy Examination- Further to the request to submit written submissions in relation to the SoS's intention to abolish RSs following the Cala Homes judgement.
24.02.11	David Churchill-Iceni	Shaun Scrutton-RDC	FOI request regarding the LDF sub-committee meeting of 01/04/09.
24.03.11	Shaun Scrutton-RDC	David Churchill-Iceni	Response to FOI request regarding the LDF sub-committee meeting of 01/04/09.
07.04.11	David Churchill-	Shaun Scrutton-	Rochford Core Strategy Examination-

	Iceni	RDC	Highlighting the Forest Heath Core Strategy
13.04.11	Shaun Scrutton-RDC	David Churchill-Iceni	Rochford Core Strategy- Implications of Forest Heath Judgement
24.06.11			Representations to CS Sustainability Appraisal Addendum June 2011. Consider the SA Addendum to be wholly insufficient and contrary to the advice of the Inspector.
30.06.11	David Churchill-Iceni	Shaun Scrutton-RDC	Separate FOI request for the RDC Brief to Enfusion and the Enfusion Scoping Report (both in relation to the CS Sustainability Appraisal Addendum June 2011).