

NEW LOCAL PLAN: SPATIAL OPTIONS (REGULATION 18) CONSULTATION FEEDBACK REPORT

1 PURPOSE OF REPORT

- 1.1 The Council is in the process of preparing a new Local Plan for the District.
- 1.2 Last year, between July and September, the Council formally consulted on its Spatial Options Consultation Document ('the Document'). This formed the second formal consultation stage in the preparation of the Council's new Local Plan, prepared under Regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012.
- 1.3 The Document set out a range of strategic and thematic options relating to policy choices to be made in the Council's new Local Plan, including the spatial strategy options for the broad distribution of proposed development sites within the District.
- 1.4 The consultation attracted a large volume of responses across a wide range of topics, received from members of the public, businesses, landowners, the development industry, neighbouring local authorities, statutory consultees and other stakeholders.
- 1.5 A Feedback Report has been prepared which summarises the feedback received and presents it by broad themes and topics, along with a focus on individual communities within the District. It provides a comprehensive analysis of consultee opinion on proposed spatial strategy options, broad policy topic areas and individual development sites.

2 INTRODUCTION

- 2.1 Since 2015, the Council has been preparing a new Local Plan to set a planning strategy for the District beyond the end of the current local development plan in 2025. Once adopted, the new Local Plan will set out how, where and when growth will come forward in the District, how new infrastructure and jobs will be delivered, and how the natural and historic environments will be protected and enhanced through the planning process.
- 2.2 Between 28th July 2021 and 21st September 2021, Rochford District Council consulted on its New Local Plan: *Spatial Options Document 2021* ('the Document') in accordance with the requirements of Regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012.
- 2.3 The Document was accompanied for consultation by an Integrated Impact Assessment (IIA) incorporating Sustainability Appraisal.
- 2.4 The Document set out a range of challenges and opportunities relating to how Rochford District could change and grow over the next 20 years. These relate

to a number of important, interconnected themes that together will contribute to achieving a sustainable vision for the District over the next 20 years and beyond. It focused, in particular, on the ‘spatial’ aspect of future development – i.e., exploring different Spatial Strategy Options (SSOs) for where future growth and development could be located. The consultation was an important step in exploring the advantages and disadvantages of different strategy options, alongside the contribution these options could make to fulfilling the objectives of the District and its diverse settlements.

- 2.5 The Document also presented options across a range of spatial themes, e.g., provision of different types of housing; combating climate change; supporting vibrant town centres; or delivering the right infrastructure to benefit residents and mitigate the impacts of development. In addition, it presented a range of visions and options for the District’s settlements, allowing local residents to tell us the parts of their local town and village that need improving, protecting or growing over the next 20 years.
- 2.6 The consultation was the second formal stage of the new Local Plan, building on the findings of the earlier consultation stage – Issues and Options – conducted in late 2017/early 2018, and acknowledges the changing planning policy landscape that has evolved since that consultation which necessitated this additional round at Regulation 18 stage. This includes the publication of a new National Planning Policy Framework in 2018 (further updated in 2019 and 2021); major reforms to the Use Class Order; the introduction of the standard method for assessing housing need; the Housing Delivery Test; and revised expectations for both affordable housing and housing delivery from small and medium sites. The consultation paper also acknowledged further upcoming change, such as the 2020 Planning White Paper (which proposed radical changes, some of which were incorporated into the Levelling Up and Regeneration Bill), and then-emerging Environment Bill, which introduced greater statutory requirements for development to implement Biodiversity Net Gain. At a local level, Rochford District has been a contributor to sub-regional planning cooperation at a South Essex level, whilst a range of additional technical evidence documents have been completed.
- 2.7 Also extremely relevant is the impact of the Covid-19 pandemic, which has had, and continues to have, a profound impact on local communities and businesses. These impacts are likely to result in permanent changes to the way we need to plan for the future, both positively and negatively, which were not foreseen at the time of the previous consultation.
- 2.8 The consultation, therefore, provided Rochford District’s communities, businesses, landowners, stakeholders, neighbouring authorities and statutory consultees with an opportunity to give their views on policy priorities, spatial strategies for accommodating the District’s development needs and on issues around local communities and prospective site allocations, based on the latest context.

- 2.9 The following section provides an insight into the feedback received and the broad findings and recommendations which emerged. The accompanying full report provides greater detail on individual questions, themes, communities and sites in the consultation. This report provides interested parties with an analysis of the spectrum of views of consultees on a range of issues related to spatial planning and the progression of the new Local Plan. It should be treated as an important piece of evidence when preparing subsequent stages of the new Local Plan's development, particularly the Preferred Options stage and its accompanying site selection methodology.

3 SPATIAL OPTIONS CONSULTATION FEEDBACK REPORT

- 3.1 The Spatial Options consultation was widely publicised and a range of methods were used to promote the consultation and engage with interested parties, in line with the Council's Statement of Community Involvement (SCI). This included a range of public events, a live webinar, social media and email bulletins, and a physical 'mail-shot' to all households in the District. The consultation documents were available in both digital formats on the Council's consultation website, and in hard copy at Council offices and libraries.
- 3.2 Comments were invited from residents, key stakeholders and other interested parties on the proposed vision for Rochford in 2050, and the fundamental range of strategic options relating to the key themes (including economic growth, housing, infrastructure and the environment) that make up our local area. Comments were also invited on the presentation of promoted sites submitted to the Council under the 'Call for Sites' well as the supporting updated SCI and draft IIA as part of this review.
- 3.3 The Feedback Report is a comprehensive document that summarises a large number of responses. A summary of key 'headlines' has been included below.

Headline 1: Responses and Respondents

- 3.4 A total of 1,536 unique submissions were received to the consultation, which represented the views of 1,814 respondents. Of these, 1,514 submissions responded to the Spatial Options consultation document itself, with the remainder responding to the accompanying documents. These submissions registered a total of 6,839 individual "comments" across all questions within the Document. Where an individual or organisation responded to multiple questions, each was registered as its own comment.
- 3.5 The vast majority of comments were submitted via email (approximately 3,858 [56%]), with the remainder split between comments submitted online through the Council's web portal (2,238 [33%]) and via paper forms (letters and paper comment forms – 743 [11%]).
- 3.6 Respondents included individual residents and businesses, representative bodies including Parish/Town Councils and community groups, those

representing the development industry such as landowners and site promoters, as well as statutory consultees and neighbouring local authorities. As indicated in Table 1, almost 94% of responses were from residents, businesses and individuals. A summary of key statutory consultee responses is provided in the accompanying report, in Section 4.

Table 1: Number of Responses by Type of Respondent

Type	Number of respondents	Percentage (%)
Residents/Businesses/Individuals	1439	93.68
Parish/Town Councils	6	0.39
Landowners/Developers	9	0.59
Planning Agents	31	2.02
Govt agencies/public bodies	12	0.78
Interest groups/trusts	12	0.78
Residents' associations/groups	6	0.39
Total	1514	100

Headline 2: Spatial Strategy Options

3.7 One of the key aims of this consultation was to explore a range of ‘Spatial Strategy Options’ (SSOs) for accommodating the District’s growth requirements. These comprised 4 main options for the spatial distribution of development, with a number of sub-options sitting within these:

1. *Urban Intensification (brownfield and existing urban areas only)*
2. *Urban Extensions*
 - a. *Urban extensions focused in the main towns*
 - b. *Urban extensions dispersed to settlements based on hierarchy*
3. *Concentrated Growth (new settlements/communities)*
 - a. *Concentrated growth West of Rayleigh*
 - b. *Concentrated growth North of Southend*
 - c. *Concentrated growth East of Rochford*
4. *Balanced Combination (combining aspects of Options 1-3)*

3.8 358 responses were received representing 419 individuals, making this the most-answered question within the Document. Many respondents indicated a preference for more than 1 approach, e.g., setting out multiple approaches within **Option 3**, or indicating that a specific option should be prioritised, with

a further option being an acceptable alternative (e.g., a number of developers/agents favouring an **Option 2** approach promoting their site(s), but also supporting an **Option 4** combined approach encompassing their desired method). Table 2 sets out all preferences given by respondents answering the question, in terms of both first preference and any second preference expressed.

Table 2: SSO Preferences (all respondents)

Spatial Strategy Option	1 st Preference	2 nd Preference
Option 1 (brownfield)	47	3
Option 2a	11	2
Option 2b	10	1
Option 2 (generic)	13	0
Option 3a	29	3
Option 3b	26	1
Option 3c	2	1
Option 3a/3b	17	1
Option 3b/3c	1	0
Option 3 (generic)	40	4
Option 4	19	18
Other	141	0
Duplicate	2	0

- 3.9 In first preferences, the single largest category was ‘**Other**’ (141 responses), representing a wide range of different views (see below). For the SSOs presented, the single largest category supported was **Option 1** (47 responses), followed by **Option 3** – unspecified (40 responses). However, when all **Option 3** combinations were included, this totalled 115 responses, indicating a strong level of support for a concentrated growth option. Where a specific location was given, the most popular first preference of respondents was **Option 3a** (West of Rayleigh - 29 responses), followed closely by **Option 3b** (North of Southend - 26 responses). A preference for either **Option 3a** or **Option 3b** also recorded 17 responses, indicating a degree of support for these sites not noticeable in **Option 3c** (East of Rochford - 2 responses).

3.10 When merging the different sub-options and adding together both 1st and 2nd preferences as set out in Figure 1 and Table 3, there is a strong preference for a concentrated option from the SSOs presented, for those respondents answering this question.

Figure 1: SSO Preferences (all)

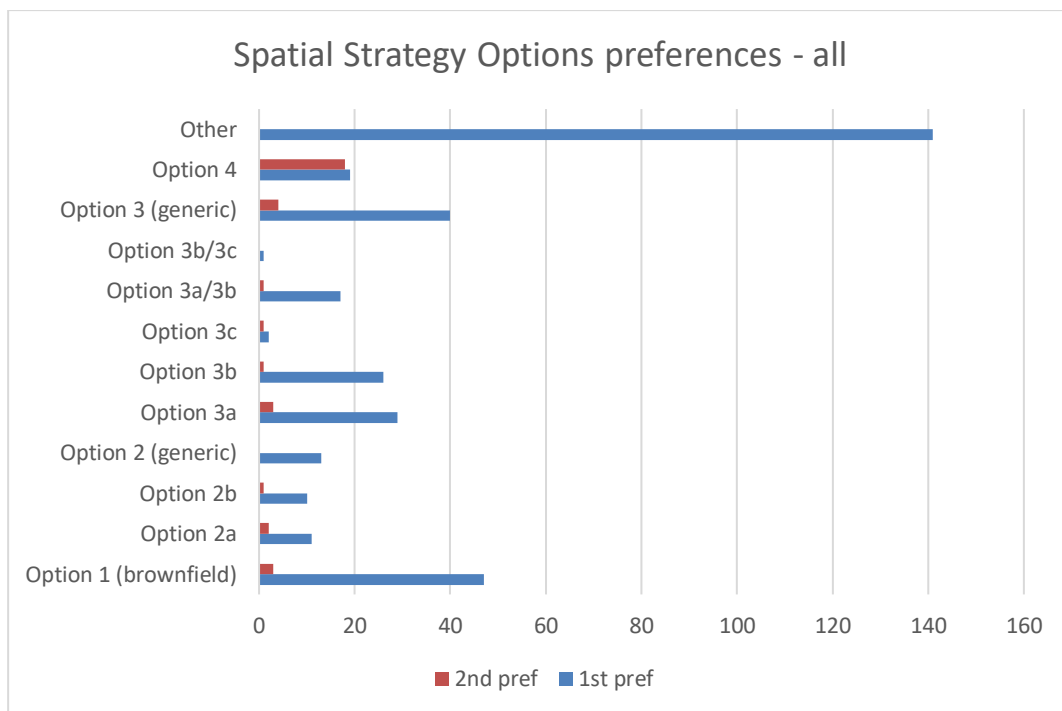


Table 3: SSO Preferences (merged)

Merged SSO	No. responses (1 st & 2 nd preference combined)
Option 1	50
Option 2	37
Option 3	123
Option 4	34
Other	141

3.11 The largest single preference indicated was that of **‘Other’**, attracting 141 preferences. It is important to note that this category represents all views which did not neatly fall within the SSOs presented in the Document. These include:

- *No development*: a significant number of representations in this category considered that further development should not take place within the District. Reasons given included a perception that the District was already overdeveloped and losing its character; concern for existing infrastructure in accommodating further population growth; opposition to the loss of Green Belt, open space, and farmland; and suggestions to await clarification on updates to the Government's policies on planning reform, housing delivery, and the 'Levelling Up' agenda (which may direct growth elsewhere). Responses within this category varied considerably, with some giving a District-wide view, whilst others only opposed development within their immediate communities.
- *Infrastructure-first*: many responses did not object to the principle of further growth, with some recognising the need for more housing. However, respondents contended it was not appropriate to consider the levels of growth outlined in the Document without further details of how supporting infrastructure would be delivered. Many felt such infrastructure should be delivered in advance, with development only permitted once this was secured.
- *Local Needs*: some representations acknowledged the need for a limited amount of additional housing to meet the needs of local residents and their families, including first-time buyers, those requiring affordable housing, and housing suitable for the elderly. However, these responses did not consider the options outlined would cater for local needs, but rather result in large amounts of unaffordable housing which would appeal largely to those from outside the District with greater means to afford them (particularly Greater London).

Views on Spatial Strategy Options Presented

- 3.12 Of the SSOs presented, different versions of **Option 3** (Concentrated Growth) were favoured, with large numbers preferring an ambitious 'garden village' or 'new town' approach which would deliver homes required whilst providing new infrastructure and not unduly overloading existing settlements, which were widely considered to be suffering from strain to transport and community infrastructure. The recent urban extension at Beaulieu Park, Chelmsford, was widely given as an example of how coordinated development at scale could deliver schools, transport links, shops and other community and recreational amenities. Option 3 was the most popular of the presented options amongst residents, although 'Other' attracted slightly more support. It was less popular amongst the development community, with many responses noting the long lead time and considerable uncertainty in such sites coming forward as the sole means of delivering the District's housing needs. Option 3 was supported by parishes which saw this as an alternative to additional burden on their local

communities, such as Rayleigh, Hockley, Hawkwell and Hullbridge, although views were split between 3a and 3b.

- 3.13 **Option 3a** (West of Rayleigh) was the most popular of these presented, with its location close to the strategic road and rail network seen as having less of an adverse impact on the District’s road network. **Option 3b** (North of Southend) also attracted a sizeable amount of support, seen by many as a location which could accommodate new communities with their own infrastructure which would also benefit surrounding towns and villages. Support for Option 3c (East of Rochford) was far more limited in scope.
- 3.14 **Option 1** (Urban Intensification) was well-regarded, with most responses considering that all possibilities to utilise brownfield or previously-developed sites should be maximised prior to any building on Green Belt land. A number of developer and agent representations observed that this option alone was insufficient to meet the District’s development needs.
- 3.15 **Option 2** (Urban Extensions) were generally favoured by developers and agents as ways to expedite these sites, cited as the best way to ensure quick delivery of new homes and infrastructure. However, it was considerably less popular with most residents as it was widely considered to be a continuation of existing Core Strategy allocations which had not delivered the expected infrastructure improvements. Amongst developers and land promoters, 2a (concentrating development in the District’s larger settlements) was favoured. Limited support for 2b attracted some support in rural parishes, where a proportionate amount of development could be accommodated.
- 3.16 **Option 4** (Balanced Combination) was seen by some, particularly the development community, as a more realistic way of ensuring housing delivery was still brought forward in early years of the Plan whilst work to deliver the more strategic-scale growth took place.

SSO Preferences Amongst Individuals

- 3.17 Of the 358 respondents to Question 6, 297 (83%) were individuals, mostly local residents and businesses. 108 (36%) of these favoured Option 3 strategies as 1st preference, whilst just 2.7% supported Option 2. Overall, ‘Other’ solutions (see paragraph 3.11 for definition) attracted the largest preference, with 125 (42%) respondents. See Table 4 for a full breakdown.

Table 4: SSO Preferences for Individuals (All)

Spatial Strategy Option	1st Preference	2nd Preference
Option 1 (brownfield)	44	2
Option 2a	4	2

Option 2b	2	0
Option 2 (generic)	4	0
Option 3a	26	1
Option 3b	23	0
Option 3c	2	1
Option 3a/3b	16	1
Option 3b/3c	1	0
Option 3 (generic)	40	2
Option 4	8	0
Other	125	0
Duplicate	2	0

- 3.18 When looking at combined 1st and 2nd preferences, **Option 3** constitutes 63% of individuals who expressed a view on the SSOs presented. Table 5 sets this out, below.

Table 5: SSO Preferences for Individuals – Merged

Merged Spatial Strategy Option	No. responses (1 st & 2 nd preference combined)
Option 1	46
Option 2	12
Option 3	113
Option 4	8
Other	125

- 3.19 Anecdotally, Option 1 attracted a good level of popularity from individuals as it was seen to preserve Green Belt, although some respondents were concerned about the impact it could have on existing infrastructure. Option 2 attracted little support, being seen as a continuation of past approaches involving edge-of-town housing estates. Some, particularly in smaller communities, favoured it for spreading the impact of development more

evenly around the District. Option 3 attracted backing for the scale of new infrastructure it could deliver without undue burden on existing communities. Option 3a was felt to have the advantage of not adding to traffic congestion on the A127 and other local roads going East, whilst Option 3b was seen by a slightly smaller number as having the potential to deliver a new community with its own infrastructure. Overall, the need for any development to mitigate its impact and benefit the wider community, through delivery of a range of infrastructure, open space and other contributions, ran strongly through virtually all responses to the question.

Preferences Amongst Development Community

- 3.20 As shown below in Table 6, agents, developers and landowners expressed different preferences to individuals/residents, with the largest first preference being variations on Option 2. However, when second preferences are also factored in (see Table 7), Option 4 was most widely backed. This reflects a degree of pragmatism, with it recognised that whilst Option 2 may be the most favourable way to secure allocation and planning permission on promoted sites, this may need to be considered alongside strategic ambitions to deliver concentrated growth. Option 3 attracted little support, with many responses noting the long lead time and considerable uncertainty in such sites coming forward as the sole means of delivering the District’s housing needs. Various promoted sites were suggested as solutions which could deliver extensions to existing settlements relatively quickly, ensuring the new Local Plan could demonstrate a supply of homes in the early years of the plan whilst more strategic growth locations were enabled for the latter stages.

Table 6: SSO Preferences for Development Industry (All)

Spatial Strategy Option	1st Preference	2nd Preference
Option 1 (brownfield)	2	1
Option 2a	6	0
Option 2b	6	1
Option 2 (generic)	9	0
Option 3a	1	1
Option 3b	1	0
Option 3c	0	0
Option 3a/3b	0	0
Option 3b/3c	0	1

Option 3 (generic)	0	0
Option 4	7	0
Other	1	0

Table 7: SSO Preferences for Development Industry– Merged

Merged Spatial Strategy Option	No. responses (1st & 2nd preference combined)
Option 1	3
Option 2	21
Option 3	4
Option 4	7
Other	1

Headline 3: Infrastructure First

- 3.21 One of the most common prevailing themes in the consultation was the ability of the District’s current infrastructure to accommodate the increased demand that additional development would bring, and those in existing communities were vocal in expressing this.
- 3.22 It was therefore strongly urged that new infrastructure provision was adequately planned for where required, whilst existing amenities were also significantly improved/expanded at the same time. This was the case in terms of community infrastructure (e.g. schools, healthcare, and childcare), where it was felt that it was already difficult to secure places or appointments. It was also the case for transport infrastructure where the capacity of the road network to deal with large volumes of additional motor vehicles was considered inadequate, whilst alternatives to driving (e.g., reliable public transport or comprehensive, safe networks of paths for walking or cycling) were insufficient to provide an alternative. Utilities (water, sewerage, electricity etc) were also widely cited as infrastructure requiring upgrading, whilst the existing waste facility in Castle Road, Raleigh was considered inadequate for the level of demand and difficult to access given its location in a constrained urban location, far from communities in the East of the District.
- 3.23 There was a perception that recently-completed / ongoing housing developments had not provided significant improvements to mitigate their

construction, and that additional strain had been placed on surrounding roads, education, and healthcare facilities.

- 3.24 Large numbers of responses favoured an **‘infrastructure-first’** approach, seeing improvements made in advance or alongside housing development, rather than well after this had commenced. Consequently, many backed approaches along the lines of Spatial Strategy Option 3, which could see a new community developed with its own infrastructure, rather than more urban extensions, which would be more reliant on existing facilities.
- 3.25 A number of respondents from the development community supported the introduction of a Community Infrastructure Levy, which it was felt would simplify the process for infrastructure contributions. The development community also underlined the importance of ensuring any commitments to provide infrastructure did not render a development unviable.

Headline 4: The Green Belt and Overdevelopment

- 3.26 There was a perception in many responses that proposals within the Document would result in ‘overdevelopment’, as the scale of promoted development sites on associated mapping covered large areas of Green Belt. Consequently, it was widely considered that the components of the draft Vision were difficult to reconcile, with the concept of a ‘green and pleasant place’ considered by many to be incompatible with the numbers of homes proposed.
- 3.27 Whilst only a very small fraction of Green Belt sites would likely be required to meet development needs, the scale of all promoted sites was emotive and raised concerns amongst many residents regarding certain sites. This in turn led to large numbers of representations received which sought solely to object to one or more sites. Many of these responses were similar in nature and referred to literature circulated by local campaign groups. Whilst it is important to record the scale of opinion on specific sites, many of these respondents may not have seen the full Document or had the opportunity to be aware that the consultation covers a wide range of themes for which feedback is sought. It was also identified that some responding misinterpreted the inclusion of potential options as being an indication that the Council considered that option to be acceptable.
- 3.28 Protecting the Green Belt was a prevailing theme in a large volume of responses. Whilst the Council’s proposals on protecting specific areas, e.g., the Upper Roach Valley, Coastal Protection Belt and proposed Local Green Spaces, were well-supported, the general view was that more should be done to protect all Green Belt land. This included privately-owned farmland, fields, and woodland, many (but not all) of which were accessible by public rights of way. Such spaces were considered vital for physical and mental wellbeing, as

well as giving much of the District its distinctive rural/semi-rural character. There was also strong feedback that agricultural land should be valued and protected for its role in food provision and wildlife preservation.

Headline 5: Climate Change and Sustainability

- 3.29 An awareness of climate change and the need for sustainable development was evident in many consultation responses, with the District's low-lying, coastal geography meaning many communities were on the 'front line' of impacts.
- 3.30 Questions were raised whether the scale of local housing need was sustainable or realistic, in terms of the impact development would have (through generation of carbon emissions and loss of carbon sinks such as trees), and from the forecast increased likelihood of surface, fluvial and coastal flooding due to climate change and increase in extreme weather conditions. Vulnerability to such effects was a common concern and was widely raised in objection to promoted sites.
- 3.31 Feedback advocated high energy efficiency standards on buildings to mitigate this, going beyond current and proposed building regulations, although concerns were raised as to the viability of this. In addition, the widespread adoption of zero and low-carbon energy sources across the District was supported as were proposals to increase the amount of trees and natural habitats in the District through biodiversity net gain.
- 3.32 Transport was a key issue, with many responses considering new housing developments were likely to generate significant additional car journeys, generating both carbon emissions and air pollution, both given as reasons not to develop specific promoted sites. The perceived adverse impact of increased air pollution was a major concern for communities near major roads or frequently-congested routes.
- 3.33 Suggested mitigations supported brownfield development (reducing the need to travel by car), widespread inclusion of electric vehicle charging infrastructure in new developments, along with widespread tree planting alongside new schemes. There was also a strong desire for improved coverage and greater frequency of public transport, particularly in outlying suburban and rural areas, to provide a realistic alternative to car travel. Many comments considered existing provision of cycle routes to be inadequate, calling instead for comprehensive networks of segregated routes to allow people to travel between home, shops, work, and education without the need to drive, tackling congestion and carbon emissions.

Headline 6: Local Green Space Designations

- 3.34 The Document also asked for feedback on a proposed list of public open spaces the Council had identified to attain Local Green Space (LGS)

designation. These were identified through qualitative and quantitative assessments of the District's open spaces in the emerging *Open Space Study*.

- 3.35 LGS designation is set out in Paragraph 101 of the NPPF and provides formal protection against development for green areas of importance to local communities, with the adoption of a Local Plan being the way to formally designate these. LGS designation affords similar levels of protection to the Green Belt in terms of development. However, sites put forward cannot be 'an extensive tract of land' and are not typically designated when there is an equivalent level of protection already in place (e.g., Green Belt status).
- 3.36 During the Open Space Study, the Council audited the District's open spaces, conducting site visits to assess their quality. Following this, 45 sites were shortlisted on the basis of meeting the criteria, set out in National Planning Practice Guidance, of being 'demonstrably special to the community' and 'local in character'. Within the Document, the Council put forward these proposed for public feedback, presenting them on maps within the 'Complete Communities' section. This allowed those respondents giving views about proposed visions for their communities to consider whether these spaces were appropriate, and whether any other sites in the settlement should be considered for similar designation.
- 3.37 Responses supported the adoption of the proposed sites as LGS. In addition, many considered that a wide range of additional sites across the District should be protected. These included range of sites currently being promoted for development within the Local Plan, most of which were in the Green Belt. Many of these were considered by respondents to have local significance, with local Green Belt considered to have a positive impact on people's mental wellbeing through the sense of openness and greenery it provided, as well as by acting as buffer zones to sensitive habitats such as ancient woodland. Many sites had public rights of way, wildlife corridors such as hedgerows, and various flora and fauna (including protected species), leading to calls for many of these sites to be considered. Although most of these sites were Green Belt, privately-owned and not always suitable for LGS designation, some had particular community value that could override this.
- 3.38 National Planning Guidance states that LGS designation should not be used in any way to undermine the Local Plan-making process (i.e., identifying sufficient land in suitable locations to meet identified development needs). In addition, National Planning Guidance does not normally recommend LGS designation for Green Belt sites (as LGS status affords a similar level of protection to that given by Green Belt designation), however does indicate there may be a role for it in villages already protected by the Green Belt to identify areas of particular importance to the local community. Given these caveats, it is recommended that any decisions to afford LGS status to sites which are currently being promoted are taken in future stages of the

development of the new Local Plan, when a clearer position on the most suitable sites for meeting development needs has been taken.

Headline 7: Draft Integrated Impact Assessment (IIA)

- 3.39 The Draft IIA was compiled to support the new Local Plan and presented alongside the Spatial Options consultation for stakeholders' feedback. An IIA is a mechanism for considering and communicating the impacts of an emerging plan and integrates the requirements of a Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Equalities Impact Assessment (EIA), and Health Impact Assessment (HIA) to provide a single assessment process to inform the development of the new Local Plan.
- 3.40 10 respondents to the Draft IIA were recorded. Of those, 6 represented agents, developers, or landowners; 2 were from local residents; and 1 each came from a neighbouring local authority and a statutory consultee. Whilst comments did indicate that the overall assessment was good, there were concerns on the impact of development, particularly on existing infrastructure and wildlife. Paragraph 170 (Habitats and Biodiversity) of the NPPF needed to be better reflected. It was also commented that the IIA did not present a detailed analysis for stakeholders to make informed decisions/comments on the various strategies and options presented.
- 3.41 A combination of brownfield and greenfield sites was advocated to meet housing need, making use of sustainable locations. Improving the affordability of housing for locals and ensuring appropriate accommodation for older people was favoured. Comments also suggested that, when considering the Health and Wellbeing theme, neighbouring authority areas should be considered and be included in an appraisal question, to ensure networks of green infrastructure joined up for maximum effect.
- 3.42 The inclusion of a question to consider whether a Strategic Option promotes the use of sustainable transport was also advocated. It was also suggested that a question was also needed to ensure that the priorities of the Essex and Suffolk Shoreline Management Plan were considered.
- 3.43 Overall, comments indicated a preference for a medium and high level of growth as opposed to the IIA recommendation for lower growth which was considered as "performing better in comparison to the medium and higher growth options in relation to the landscape, historic environment, environmental quality and natural resource themes." Medium and high level of growth was considered to attract increased investment for key infrastructure and would provide a greater opportunity for a range of homes to be delivered. It was advocated that Strategy Option 4 would offer the best combination of development outcomes.

4 ENVIRONMENTAL IMPLICATIONS

- 4.1 The consultation posed a range of questions on a range of policy areas relating to the environment, biodiversity and reducing carbon emissions, with a significant body of responses received relating to these themes. These responses can be used to inform the strategy of the new Local Plan ensuring that it is sustainable in the context of the environment.

5 RESOURCE IMPLICATIONS

- 5.1 The Feedback Report has been prepared within existing agreed budgets and resources and is not considered to have any wider resource implications.

6 LEGAL IMPLICATIONS

- 6.1 The Feedback Report has been prepared under the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) which requires the publication of a statement setting out which bodies and persons were invited to make representations under Regulation 18; how those bodies and persons were invited to make such representations; a summary of the main issues raised by those representations, and how those main issues will be addressed as the new Local Plan progresses.
- 6.2 Failure to prepare or publish a Feedback Report to subsequently support the submission of the Council's Local Plan for examination will not adhere to this requirement and could result in the Local Plan being found legally uncompliant.

7 PARISH IMPLICATIONS

- 7.1 Parish and Town Councils will be interested in the content of the report, both due both to the responses from their local residents on the implications of various spatial proposals for the new Local Plan, and as respondents and consultees to the consultation in their own right.

8 EQUALITY AND DIVERSITY IMPLICATIONS

- 8.1 An Equality Impact Assessment has not been completed as no decision is being made.

9 RECOMMENDATION

- 9.1 It is proposed that the Committee **RESOLVES**
- (1) To note the Feedback Report at Appendix A
 - (2) To consider its findings and recommendations when preparing for subsequent phases of the new Local Plan, in particular the Preferred Options.



Phil Drane

Director of Place

Background Papers:-

A full summary of responses by question (Appendix 5) is available upon request

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If you would like this report in large print, Braille or another language please contact 01702 318111.