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Glossary of Abbreviations

Abbreviation	Meaning	
ASELA	Association of South Essex Local Authorities	
ВВС	Basildon Borough Council	
ccc	Chelmsford City Council	
СРВС	Castle Point Borough Council	
DTC	Duty to Cooperate	
EA	Environment Agency	
ECC	Essex County Council	
GDPR	General Data Protection Regulations	
HE	Historic England	
IIA	Integrated Impact Assessment	
NE	Natural England	
NHS HCP	NHS Mid & South Essex Health & Care Partnership (incorporating Castle Point & Rochford Clinical Commissioning Group)	
NPPF	National Planning Policy Framework	
RDC	Rochford District Council	

Regulation 18	Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended	
SBC	Southend Borough Council	
SCI	Statement of Community Involvement	
SE	Sport England	
sso	Spatial Strategy Option	
тс	Thurrock Council	

Appendix A

Preface

This Regulation 18 Consultation Statement has been prepared under the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) (hereafter referred to in this report as 'Regulation 18') 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.

This document consists of a core summary report with appendices containing more detailed information.

A Regulation 18 consultation represents the scoping stage to decide what should be included in a Local Plan, and consultation with key stakeholders helps to ensure that it is based on up to date, robust evidence.

1. Introduction

- 1.1 Rochford District Council is preparing a new Local Plan that will be used to guide development in the District to 2040 and beyond. This Feedback Report has been prepared to summarise and conclude upon the Spatial Options Document consultation which forms the second formal stage in the preparation of the new Local Plan.
- 1.2 Once adopted, the new Local Plan will set a new planning strategy for the District, helping to co-ordinate the delivery of much needed housing, employment, and infrastructure, whilst ensuring that our natural, historic, and built environments are protected and enhanced for future generations to enjoy.
- 1.3 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. The Document was accompanied for consultation by an Integrated Impact Assessment (IIA) incorporating Sustainability Appraisal, as well as a Statement of Community Involvement (SCI), for which a separate feedback report will be prepared.
- 1.4 This report provides a summary of the responses received including quantitative analysis and summaries of comments from a variety of stakeholders inclusive of residents; landowners/developers/agents; businesses; statutory consultees; parish councils; Members of Parliament, community, trusts and other interest groups; as well as district and parish councillors commenting in a personal capacity, submitted in response to the Document.
- 1.5 The Document sets out a range of challenges and opportunities relating to how Rochford District could change and grow over the next 20 years. These challenges and opportunities 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 focuses 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. This consultation is an important step in exploring the advantages and disadvantages of different strategy options, alongside the contribution these options can make to fulfilling the objectives of the District and its diverse settlements.
- 1.6 The Document also 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.
- 1.7 It is recognised that not all of the various options presented in the consultation are equally sustainable or appropriate, and that it is critical to ensure the right ones are selected to achieve a sustainable vision.
- 1.8 Comments were invited from residents, key stakeholders and other interested parties on the proposed <u>vision</u> for Rochford in 2050, and the fundamental <u>range of strategic options</u> 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 in 2017, as well as the supporting updated SCI and draft IIA as part of this review.

Duty to Cooperate

- 1.9 The Localism Act 2011 sets out that local authorities must cooperate with prescribed bodies and neighbouring local authorities to maximise the effectiveness of local plans. They must engage constructively, actively and on an ongoing basis on strategic matters relating to sustainable development.
- 1.10 A strategic matter is defined as sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas.
- 1.11 Rochford District Council has a Duty to Cooperate (DTC) with Essex County Council and a range of adjoining authorities on strategic planning matters to maximise the effectiveness of respective local plans. The DTC also requires the Council to cooperate with other prescribed bodies and statutory consultees, such as Natural England and the Environment Agency.
- 1.12 As part of the consultation process, the Council contacted the following prescribed and other statutory consultation bodies to invite them to make representations on the document. Please note this list is not intended to be exhaustive:
 - Essex County Council
 - Basildon Borough Council
 - Brentwood Borough Council
 - Castle Point Borough Council
 - Chelmsford City Council
 - Maldon District Council
 - Southend-on-Sea Borough Council
 - Thurrock Council
 - Anglian Water
 - Civil Aviation Authority (CAA)
 - Environment Agency
 - Essex Police
 - Essex and Suffolk Water
 - Highways England
 - Historic England
 - Marine Management Organisation (MMO)
 - Mid and South Essex Clinical Commissioning Group
 - Natural England
 - National Grid
 - Network Rail
 - Sport England

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- 1.13 As part of the consultation process, the Council wrote an additional letter to its adjoining local authorities to highlight the likelihood insufficiency of unconstrained land within Rochford District to meet identified needs for housing and other types of development. As set out in the letter, there remains a strong unlikelihood of Rochford District's identified development needs being met within the District without developing on the Metropolitan Green Belt. As set out in national policy, before concluding that exceptional circumstances exist that justify development on the Green Belt, local authorities should work with adjoining authorities to understand whether any of this need could be met in areas of less constraint. The purpose of this letter was therefore to understand the capacity of less constrained land within adjoining authorities to meet any of the District's identified development needs. A copy of this letter and the responses received are set out in Appendix 4.
- 1.14 Officer meetings were held with several prescribed bodies during the consultation period prior to receiving their written responses.

South Essex Joint Strategic Framework

- 1.15 Rochford District Council, together with neighbouring authorities in South Essex and Essex County Council, are working together as part of the Association of South Essex Local Authorities (ASELA). A number of workstreams and projects have been identified under ASELA, including a housing and infrastructure delivery workstream that incorporates a new joint strategic framework for South Essex.
- 1.16 The South Essex Framework is expected to be a non-statutory framework which demonstrates how various strategic and cross-boundary issues will be addressed across South Essex over the next 20-30 years. The framework is expected to cover themes including housing, employment, infrastructure and environmental protection. The South Essex Framework will not, however, replace or remove the local strategy determination being delivered through individual local plans, and the relatively early stage of the South Essex Framework means there are no particular spatial planning implications arising from this work at this stage.

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2. The New Local Plan to Date

- 2.1 As part of the preparation of its Local Plan, the Council has undertaken one previous consultation prior to the *Spatial Options Document 2021* consultation. This consultation was the *Issues and Options Document 2017/18*, as expanded upon below.
- 2.2 It is important to point out that the *Issues and Options Document 2017/18* and the *Spatial Options Document 2021* consultations have both formed 'early stage' consultations, and the Council has not, at this stage, published any draft policies or sought to identify the sites it considers should be allocated for development.

Issues and Options Document 2017/18

- 2.3 In accordance with Regulation 18, between 13th December 2017 and 7th March 2018, the Council consulted on the Issues and Options document. This document set out a range of high-level challenges and opportunities for delivering homes and jobs, supporting commercial development, delivering infrastructure, supporting health, community and culture and protecting and enhancing our environment.
- 2.4 A summary of the responses made during the consultation have been published online¹.
- 2.5 The feedback and key themes emerging from this initial consultation have informed the SSOs, District and settlement visions and themes presented in the following *Spatial Options* consultation. It was, however, recognised that a period of time had elapsed since the Issues and Options consultation within which national policy had evolved and the evidence base had developed. This meant it was considered proper and pertinent to reconsider some issues again in the Spatial Options document in the context of the latest evidence and national policy.

Call for Sites 2015-2018

- 2.6 In 2015, the Council issued a 'Call for Sites' in order to gather information from landowners and developers about the potential availability of land particularly brownfield/previously developed land that might be considered suitable for development, including meeting future needs for housing, employment, retail and other uses. In light of a number of potentially significant new sites becoming available and the relatively early stage the new Local Plan was at, the Council continued to allow sites to be submitted for consideration until 2018.
- 2.7 Any sites received through the Call for Sites prior to March 2017 were assessed within the Strategic Housing and Employment Land Availability Assessment 2017 (SHELAA). Sites received after March 2017 were assessed in the Housing and Employment Land Availability Assessment (HELAA) Update in 2020.

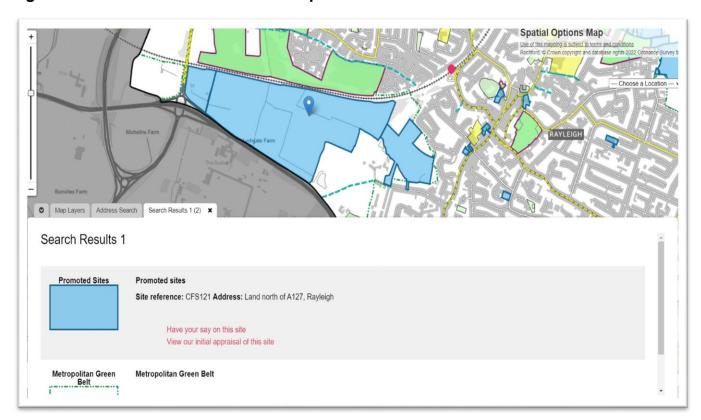
¹ https://www.rochford.gov.uk/issues-and-options-document-feedback-report-2018

Rochford D	istrict	Council	New	Local	Plan
– Spatial O _l	otions	Feedbac	k Rej	port 20)21

Site Appraisal Paper and Interactive Map

- 2.8 To inform responses to the Spatial Options Document, all sites received through the Call for Sites were assessed against a range of thematic suitability criteria as part of the Site Appraisal Paper.
- 2.9 Sites assessed through this process were also published in an interactive map² alongside the Document, which also mapped key constraints and amenities. The map also cross-referenced to the outputs from the Site Appraisal Paper's assessment of that site.
- 2.10 It is expected that this site appraisal process will be adapted and improved to support a fuller site selection process as the new Local Plan progresses.
- 2.11 Whilst the Site Appraisal process recommended that a small number of sites were sifted at this stage due to insurmountable constraints, it is important to note that the site appraisal process was intended to inform responses and not in itself support the eventual selection of sites for allocation.

Figure 1 - Screenshot of Interactive Map



² https://rochford.opus4.co.uk/planning/localplan

Rochford District	Council	New	Local	Plan
 Spatial Options 	Feedbac	ck Re	port 20	021

3. Summary of Consultation Process

- 3.1 Responses received to the public consultation on the earlier Issues and Options Document helped inform the preparation of the Spatial Options Document. The Spatial Options Document forms the latest stage in the preparation of Rochford District Council's new Local Plan.
- 3.2 The Document sets out a range of spatial challenges and opportunities relating to how Rochford District can change and grow over the next 20 years and beyond. These challenges and opportunities relate to a number of important, interconnected themes that together will contribute to achieving a sustainable vision for the District.
- 3.3 This consultation has been an important step in exploring the advantages and disadvantages of different strategy options, alongside the contribution these options can make to fulfilling the objectives of the District and its diverse settlements.
- 3.4 The Spatial Options Document and its accompanying IIA were published for consultation between 28th July 2021 and 22nd September 2021.
- 3.5 The full set of documents, including 'quick links' to relevant evidence documents, were published online at https://rochford.oc2.uk/.

Publicity, Notification and Public Engagement

Publicity and Notification

- 3.6 Advance publicity of the forthcoming public consultation was carried out in accordance with the Council's adopted Statement of Community Involvement (SCI) and included:
 - A press release that was published on the Council's website on 28th July 2021, along with a banner at the top of the homepage
 - A consultation leaflet posted to all addresses registered for Council Tax in the District
 - Letters sent to the Council's mailing list where not covered by the bullet point above
 - Poster and leaflet displayed in all local libraries in the District, and sent to town and parish councils for display in local noticeboards
 - District News bulletin sent to the Council's email mailing list on 28th July 2021, with a series of periodic reminders.
 - Periodic social media alerts on the Council's corporate accounts (Facebook, Twitter and Instagram)

 Email notification – statutory consultees and Planning Policy Mailing List. In addition, two features in the Council's weekly business e-bulletin, sent to over 2,500 recipients.

Public Engagement

3.7 In line with the Council's <u>Statement of Community Involvement</u> (SCI) and previous consultation (Issues and Options), a wide variety of methods were used to promote the consultation and engage with interested parties as set out below. Delays as a consequence of the COVID-19 pandemic meant that the consultation was to largely coincide with the summary school holiday, and as a result a decision was taken to extend the consultation period from the statutory minimum of 6 weeks to a full 8 weeks.

Methods

Public Events

- 3.8 The consultation included 8 external 'drop-by' public events at seven different locations in the District, on weekdays, both during the day and early evenings, allowing the public to review documents and maps, to ask questions to officers, including on the Local Plan process, and give informal feedback on their views. Paper comment forms were also available at these events for those attendees without internet access, or who may have found it easier to hand write a consultation response. Due to the continuing prevalence of Covid-19, and to minimise risk to the public, an early decision was taken to hold events outdoors in well-known and accessible public locations, and where possible to coincide with other popular attractors such as market days.
- 3.9 Due to Covid and events taking place outdoors, exact attendance counts were unable to be taken, however an estimated range is indicated below.

Table 1: Public Events Schedule

Date	Time	Venue	Estimated No. of Visitors
04/08/21	9.30am- 4.00pm	High Street, Rayleigh	200-250
10/08/21	9.30am- 3.30pm	Market Square, Rochford	50-100
16/08/21	3.00pm- 7.00pm	Old Fire Station, Hockley	50-100
24/08/21	3.00pm- 7.00pm	Public car park, Pooles Lane, Hullbridge	25-50
25/08/21	9.30am- 4.00pm	High Street, Rayleigh	200-250
26/08/21	3.00pm- 7.00pm	Recreation Ground, Great Wakering	50-100

09/09/21	3.00pm-	Car park, Canewdon Village Hall, 10-25	
	7.00pm	Canewdon	
13/09/21	1.00pm-	Hawkwell Baptist Church, Rectory	25-50
	4.00pm	Avenue, Hawkwell	

Figure 2: Map of Public Event Locations



Live Webinar

3.10 An online live <u>webinar</u> was also made available on 25th August 2021 and is still available to view on YouTube. This gave a detailed overview of the Local Plan Process and the issues presented in the Document and allowed members of the public to submit questions in advance. To date, at the time of writing this report there have been 170 views.

Social Media

- 3.11 A sustained social media campaign, to promote public engagement throughout the 8 week consultation period, included 19 separate social media posts on each of 3 platforms (Facebook, Twitter, and Instagram, examples of which are included in Appendix 2) between 28th July 2021 and 22nd September 2021. These comprised general publicity about the consultation, refreshers/reminders, posts on specific themes covered by the consultation (e.g., housing, climate change or the economy), and details of public events taking place. Collectively, these posts achieved a reach of 162,052 views, broken down as follows:
 - Facebook: 69,739 views including a "boosted" advertisement on Facebook which reached 1,955 people within the District.
 - Twitter 90,522 views
 - Instagram: 1,791 views.
 - In addition, a post was made on the Council's corporate LinkedIn page at the beginning of the consultation period, aimed at the business community.

Response Rate

- 3.12 A total of 1,536 unique submissions were received to the consultation, which represented the views of 1,814 respondents. This reflects the fact that some submissions were clearly made on behalf of more than one individual, e.g., a couple.
- 3.13 These submissions registered a total of 6,839 individual "comments". Where an individual or organisation responded to multiple questions, each was registered as its own comment. This indicates the average respondent responded to between 4 and 5 questions. In reality, the breakdown was much starker between respondents who responded to a large number of questions and those who made a single overarching submission.
- 3.14 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.
- 3.15 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%]).

Table 2: Consultation Submission Methods

Submission Method	No. of Responses	%
(Total no. of Submissions 1,536)	(comments)	/6
Web	2,238	33
Email	3,858	56
Paper	743	11
Total	6,839	100
Total No. of Submissions	1,536	

3.16 A small number of submissions were received after the extended consultation deadline of 5pm on Wednesday 22nd September. Given that this consultation formed an early stage of the development of the new Local Plan, these were accepted where the late submission was justified. For future consultation stages a stricter process will apply to receiving late submissions.

Processing Comments

3.17 All comments received were reviewed and any discriminatory or sensitive information redacted before being recorded as duly made. The consultation comprised a range of questions, giving respondents the option to 'support', 'object' or 'comment' on each. The majority of respondents made a single overarching submission, or responded to only a few questions, rather than expressing a view on every question in the Spatial Options document.

Consultation Summaries

- 3.18 After all comments were processed in the manner described above, the representations received were reviewed on a document element- by-document element basis (i.e., for each of the main chapters and themes set out in the Spatial Options Document), with the prevailing issues summarised. These summaries are presented in the relevant tables further below in this report.
- 3.19 The summaries are a reflection of the issues raised during the consultation. They do not record every single comment or view that was made during the consultation. A record of all representations has been published online.
- 3.20 As individual comments were able to be 'tagged' multiple times against different document elements, the total of comments for each individual summary (submission)

- combined exceeds the number of comments received and is not an error. This reflects that a large number of comments covered numerous elements in their submission.
- 3.21 The tally of comments in each summary (submission) represents the number of submissions received and not how many signatories there were to each letter, email, or web site submission. In any case, it is the nature of the particular planning issues raised in comments that is most critical to effective plan-making and not necessarily the number of comments received.
- 3.22 The key themes emerging from comments received during this consultation will be taken into account and used to inform the preparation of the next stage of the Local Plan process, the 'Preferred Options' consultation. This will begin to set out the draft policies and prospective locations for the following Regulation 19 Stage, which will guide how planning and development takes place across Rochford District to 2040 and beyond. This will present future opportunities for all stakeholders, including the local community, to have their say in the future direction of the Local Plan.

4. Summary of Consultation Responses

- 4.1 This section provides summaries of the representations received in response to the consultation. Firstly, it provides an overview of responses received from statutory consultees and stakeholders, before providing general element-by-element summaries of all responses.
- 4.2 For key headline findings relating to the consultation, please refer to Section 5.
- 4.3 For summaries of each individual question posed in the Document, please refer to Appendix 5.

Statutory Consultees and Other Specific Stakeholders Formal Written Responses

4.4 Table 3 below sets out a summary of formal written comments from statutory consultees and other specific bodies on an element- by- element basis. A more definitive summary by each consultee is further set out in Appendix 3.

Table 3: Summary of Statutory Consultee Responses Element by Element

Document / Element / Chapter	Summary of Comments
Consultation Process	No specific comments.
	Spatial Options Document
Introduction	Use of the South Essex (ASELA) evidence base to inform the Spatial Options consultation – improves consistency of planning between the South Essex boroughs (CPBC / BBC/TC). The South Essex Plan and water cycle study can inform development restrictions (EA). SBC advocate continuing work between SBC and RDC in preparation of joint evidence and technical work to support plan making. Formal collaborative arrangements requested supported by a new Statement of Common Ground (ECC)
Rochford in 2021 / Rochford in 2050	Strategic Objective 15 should include reference to a new Country Park north-east of Southend – a needed addition of informal recreation (SBC). TC agree with strategic priorities and objectives. Consideration needs to be given to waste water infrastructure to ensure development phased in line with treatment capacity. Incapacity can restrict development (EA). Flood risk needs to be considered (management), and in light of climate change.

	SE agree with Strategic Objectives 9, 11, 15 and 17.
	NHS HCP support ambitions in Vision to improve health and wellbeing. Supported Strategic Objectives 3, 4, 7, 8, 11, 14 15 and 23, suggesting some amendments and additions to support access to health and social care and promote active lifestyles.
Strategy Options	In terms of wastewater apparatus capacity, Rayleigh West is the preferred option, followed by Rayleigh East and Rochford (up to 2.5k additional dwellings). Concentrated growth is preferred for water infrastructure investment (AW).
	Natural and water environments need to be protected (EA).
	CPBC and BBC unable to assist with unmet housing need. RDC need to be aware we (CPBC) considering own growth in North West Thundersley area, south of A127, and south of RDC option West of Rayleigh, dependent on access from Fairglen Interchange. There is scope for RDC, CPBC and BBC to work collaboratively to open up development opportunities around this junction (CPBC).
	SSO 4 offers the most appropriate strategic approach providing sustainable communities and new infrastructure (CCC), also supported by TC. SSO 3a – West of Rayleigh is welcomed but is dependent on a new highway and sustainable transport link. SSO 3c – East of Rochford would be dependent on new highway provision as existing Ashingdon Road being of inadequate capacity. Figure 23 identifying SSO 3a, 3b, 3c and 4 as providing a positive return regarding transport and movement is misleading. SSO 3b would meet some of SBC's unmet housing need, requiring new infrastructure and potential to deliver development finance, supported by TC. Option 2: Urban extensions is unlikely to accommodate growth (SBC).
	BBC object to SSO 3a West of Rayleigh as will impact access and connectivity to Wickford undermining the soundness of the recently submitted local plan. South of Wickford has been identified by BBC as a housing growth area. Constraints would need to be addressed for future growth in the next local plan review.
	Any additional 'buffer' to housing numbers to drive economic growth or address unmet need from elsewhere is supported but must be based on sound evidence (ECC). A proportionate spread of growth across the district is not supported as would not deliver required growth. A combination of options is supported. SSO 3a would need to be delivered in the longer term due to constraints of current strategic road network, and with regard to emerging proposals from Basildon and Castle Point Boroughs (ECC).
	NHS HCP note each SSO will require additional healthcare capacity and means for achieving this will vary depending on scale and

	location of development. No preference at this stage, look forward to further engagement to ensure healthcare needs addressed.
	Where promoted sites are current or former sports facilities, and considered within the Preferred Options, the Council is encouraged to engage with Sport England.
Spatial Themes	Transport and Connectivity require greater emphasis due to having a wider impact. Climate Change – SBC support sequential approach to flood risk, and low carbon, renewable sources, and higher energy efficiency standards for new development. Coastal Protection Belt and Upper Roach Valley should be protected. New design guides, codes and masterplans should be created supporting new local plan (SBC).
	EA support sequential siting of development out of flood zones.
	A place-making charter would inform relevant policies and decision making, with principles embedded in local policies, and support principles set out. Essex Design Guide principles are supported and could be applied in Rochford District (SE).
	NHS HCP support sequential approach, safeguarding of Coastal Protection Belt and Upper Roach Valley, requiring developers to source low carbon & renewable energy, and high energy efficiency standards in new development. Also support place-making charter to deliver high-quality built environments; green and blue spaces; active travel; provision for local/community food production; and accessible and adaptable homes. Important to ensure existing communities and new developments (including Gypsy & Traveller communities) are integrated with easy active travel options and public transport, to ensure development has positive impacts on health and wellbeing of all residents.
Housing for All	RDC should seek, through an option, to meet own housing, Gypsy and Traveller Transit site, employment, and retail needs in full with an appropriate buffer, whilst protecting and enhancing the environment (CCC). CCC are proposing significant growth in South Woodham Ferrers in proximity to Rochford District. Growth in Rochford District should not have adverse impacts on this growth on existing and proposed facilities, including education (CCC).
	Non-exclusive Options 3,4 and 5 (i.e., prioritising the regularisation / expansion of existing sites; allocating new areas of land for permanent sites; and requiring new strategic housing allocations to set aside areas for permanent sites) would provide flexible approach to meeting Gypsy and Traveller accommodation needs (TC).

Employment and Jobs	Land north of Temple Farm Industrial Estate provides an opportunity to meet future employment needs as part of SSO 3b (SBC).
Biodiversity	No specific comments.
Green and Blue Infrastructure	SSO 3b offers opportunities for new accessible green space, including a Country Park (SBC). SSO3 is supported but needs a robust strategy, and consideration of the proposed South Essex Estuary Park (SE).
Community Infrastructure	NHS HCP suggested rewording of text on healthcare to reflect that an integrated approach across a wide range of health and social care facilities would be required to meet existing and future needs. This includes increasing capacity in hospitals, investing in GP practices, establishing healthcare hubs hosting a range of diagnostic and early intervention services, a move to digital services and refurbishment, extension and sharing of facilities, along with new builds.
	SSO 3b offers opportunities for new/improved community infrastructure (SBC). Support for or in co-located/integrated facilities (SE).
Open Spaces and Recreation	Specific advice should be sought from SE . Support is given for the potential 3G pitch locations within the feasibility study. Investment into 3G pitches in adjoining local authorities should be considered. All Strategy Options offer potential to deliver open space or sport facility improvements. Smaller development can offer financial contributions towards off-site provision.
Heritage	HE recommends that Heritage Impact Assessments are undertaken for future site allocations as will inform site-specific policies. The high level of heritage assessment of the Call for Sites is commended.
Town Centre and Retail	No specific comments.
Transport and Connectivity	Public transport provision needs to be improved alongside growth. RDC and CPBC need to work together to ensure the ECC route improvement strategy from Hadleigh to Rayleigh Weir extends into Rayleigh Town centre and Rayleigh Station (CPBC). Improvements to A127 are required to facilitate growth. Opportunities for new link road north of Southend, and transport hub at Southend Airport Railway Station needs exploration. SSO3c offers opportunity to deliver an outer strategic highway route linking A130 between Rayleigh and Hullbridge (SBC).

Green Belt and Rural Issues	No specific comments.	
Transi ioodoo		
Planning for Complete Communities		
Rayleigh	Housing need and community infrastructure could be met from SSO3a – growth West of Rayleigh (SBC).	
Rochford and Ashingdon	Edwards Hall Park offers local green space significance due to its gateway into Cherry Orchard Country Park. Coalescence of Rochford with Southend should be avoided (SBC).	
Hockley and Hawkwell	No specific comments.	
Wakerings and Barling	SSO3b offers potential for improved community and transport infrastructure, and public green space. Coalescence with Southend should be prevented (SBC).	
Hullbridge	No specific comments.	
Canewdon	No specific comments.	
Great Stambridge	No specific comments.	
Rawreth	No specific comments.	
Paglesham	No specific comments.	
Sutton and Stonebridge	SSO3b offers potential for improved community and transport infrastructure, and public green space (SBC).	
Rural Communities	No specific comments.	
Statement of Community Involvement	Clear and comprehensive (CCC).	
Integrated Impact Assessment	Fulfils the requirement and duties for the Sustainability Appraisal, Strategic Environment Assessment, Equalities Impact Assessment and Health Impact Assessment (CCC). Health and Wellbeing – neighbouring authority areas should also be considered due to cross-boundary green infrastructure networks. There is no appraisal question to consider use of sustainable transport Strategy, e.g., walking and cycling. The Essex Green Infrastructure Strategy 2020 could provide additional evidence for this aspect of the emerging Local Plan (NE).	

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Climate Change – **NE** recommend an appraisal question to ensure that options are considered for compatibility with the Essex and Suffolk Shoreline Management Plan (**NE**).

Biodiversity – Reference needs to be given to policy advice of para. 179 of the NPPF (Habitats and Biodiversity). Specific reference should be made to nationally or locally protected sites. Due to increased emphasis on Biodiversity Net Gain the following wording is suggested for the first appraisal question: "Avoid, or if not possible, minimise impacts on biodiversity, nationally or locally protected sites, and pursue opportunities for securing net gains for biodiversity" (NE).

Summary of All Consultation Responses

4.5 Table 4 below sets out brief, high level summaries of the responses to the consultation by each of the Document elements. For a full, question by question summary, please see the Individual Summaries table in **Appendix 4**. More detailed responses from statutory consultees, and other key stakeholders, are provided above in Paragraph 4.4 and in Appendix 3.

Table 4: Consultation Summary of Comments by Element, with Initial Council Response

Element / Chapter	Summary of Comments	Initial Council Response
Consultation Process	The consultation generated a range of feedback on how the process was carried out, and how this could be improved in future to ensure all residents and consultees were able to access, understand and respond to the consultation. Key areas of feedback included the language used (some felt that the Document contained too much technical terminology, making it difficult to understand); the breadth of information (some considered the Document was too lengthy and therefore difficult for many respondents to digest); how information was presented (some respondents considered there was too great an emphasis on digital methods to access key details, such as consultation documents and the map of promoted sites); methods of responding (some felt this favoured those seeking to respond by digital means, rather than by letter); and the format and timings of engagement events (some people did not find the timings convenient, or did not consider the outdoors locations to be appropriate).	The Council is committed to ensuring that its consultation materials are as widely publicised and accessible as possible. The full range of consultation documents were available in both digital and hard copies, whilst representations were accepted in a range of formats, including paper format. The accompanying Statement of Community Involvement sets out the methods by which this was carried out. Feedback received on the consultation process will be reviewed and, where necessary, be adapted for future rounds of consultation.
Introduction	Technical Evidence Some comments considered the technical evidence as satisfactory, others suggested more detailed and up to date additional evidence was required. Examples given included infrastructure; climate change; development impacts; pollution / air quality; habitat; environmental impact; heritage; housing need; economic growth; green belt and Shoreline Management Plan.	The Council has noted and will consider the comments received. Further technical evidence / studies are programmed throughout the Local Plan making process to ensure the final version submitted for examination is clearly justified and informed by up-to-date evidence.
Rochford in 2021 / Rochford in 2050	Vision Some respondents felt the vision contradicted with future development plans with reduced settlement boundaries; environmental impacts; climate change, and 'infrastructure first' themes presented. Transport accessibility was the key driver for many on where development could be located.	The Council considers a draft vision will help to deliver sustainable development and provide conformity with national policy. The Council has noted and will consider the comments received when updating the vision for the next round of

	The importance of community engagement to adopt a range of separate settlement-level visions and priorities coupled with an overarching vision for the District was advocated. Some comments emphasised that visions should be determined by parish councils providing clarity to future development. Visions for London Southend Airport, Baltic Wharf, main town centres, growth areas and generic visions for villages and hamlets was advocated. Comments indicated that elements of visions should be evidenced, e.g., Historic Environment Characterisation Studies and Heritage Impact Assessments.	consultation on the new Local Plan (the Preferred Options).
	Strategic Priorities and Objectives Most comments objected and presented the common theme that infrastructure needed to be a priority, including mitigating the effects of climate change and an accessible green network. The principle of a new settlement was supported by some due to its ability to mitigate infrastructure concerns. Supporting comments also identified other priorities and objectives to be considered. Many comments as a response to this question and throughout the consultation have also stated that the Council should "push back against central government demands".	The comments received against the strategic priorities and objectives are noted and revisions will be considered as the new Local Plan progresses, including to any aspects that are currently absent or lacking emphasis.
	Adaptable social housing as well as affordable housing, including local exception sites and eco-friendly homes, were considered a priority, as well as an ageing population, green belt, and biodiversity. Comments advocated that town centre commercial accommodation needs to be	
	flexible / adaptable. Comments presented that more support is required for urban developments and settlement extensions, and that a SWOT analysis is required taking account of growth impacts to inform strategic objectives, aligned with residents' views.	
Strategy Options	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	The broad preferences for maximising use of previously developed and brownfield sites are noted, along with the strong desire for any development to secure significant infrastructure which will not only provide for new communities and mitigate their effects, but also benefit the lives of existing

	coordinated development at scale could deliver schools, transport links, shops and other community and recreational amenities. Of the different locations presented under Option 3, 3a (West of Rayleigh) was the most popular, 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. Option 2 (Urban Extensions) were generally favoured by developers and agents as ways to expedite these sites, although 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. Option 4 (Balanced Combination) was seen 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. Alongside these preferences, the majority of representations favoured Option 1 (Urban Intensification), 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. The largest number of responses fell under 'Other'. Responses for this were varied, but the most common were either opposed to all further development or supported an 'infrastructure-first' approach, restricting development until the required infrastructure had been provided in advance.	residents. The Council will carefully consider the responses received from this section in determining the broad direction of where in the District development could be delivered to achieve the draft Vision and meet the District's development needs. This will take into account a wide range of important factors such as deliverability; viability; plans to deliver infrastructure; impact on existing communities and infrastructure; and impact on the Green Belt and natural environment. At the next stage in developing the new Local Plan (the 'Preferred Options'), a refined spatial strategy with a narrowed down list of prospective sites will be presented for further consultation. Comments received against this section will inform that strategy refinement process.
Spatial Themes	Climate Change and Resilient Environments	The Council considers the draft spatial themes and objectives will help to
	On flooding and coastal change , most comments agreed with the sequential approach to development, but evidenced with accurate flood risk data. Comments presented how communities could be protected with development being concentrated within the main District settlements with some development in flood zone 1, 2 and 3. There was concern that this would necessitate release of green belt. Comments	deliver sustainable development and are in conformity with national policy. The Council has noted and will consider the comments received. These policies will be further developed

indicated that flood areas should be considered for green energy initiatives, public open space, and biodiversity.

Most comments agreed that the **Coastal Protection Belt and Upper Roach Valley** should be protected from development, with other areas / specific sites that should also be considered for landscaped character, buffering, farming, and health and wellbeing of communities.

Proposals for improving **energy efficiency standards** in buildings were strongly supported, given concerns about climate change and heating costs. Current 'minimum' building regulation standards were not felt to be sufficient, with many responses pushing for the highest possible standards, or Net Zero, including Essex County Council. Many felt a clear message needed to be given to the development industry that technologies to reduce energy use should be adopted as much as possible, and that standards should not be negotiable. The reuse and retrofitting of existing buildings, rather than their demolition and rebuilding, was also widely supported.

Whilst the development industry generally supported improved standards and were keen to outline their progress towards achieving Net Zero, most argued that forthcoming changes in national building regulations, along with the Future Homes Standard from 2025, would deliver reductions in carbon emissions in a way which is more likely to be achievable, given the major investments in training and supply chains which would be required to roll-out new technology. Any higher standards the Council wished to apply locally would require robust supporting evidence, with consideration given to the impact on viability of future proposed developments.

There was strong support for proposals for developments to source a percentage of their energy from **low-carbon and renewable sources**, with the vast majority backing this and many feeling that the Council should go beyond any 'minimum' standards and demand ambitious targets for developments sourcing energy both from renewable sources and on-site, to meet Net Zero obligations. Many thought this should be fully integrated with other sustainability measures, including energy-efficient buildings, EV charging points, community heating, heat pumps, water recycling and walking/cycling networks. The development community generally supported the proposal, subject to viability.

as the Local Plan process progresses. The Council will work closely with partners, including Essex County Council and the Environment Agency, in considering the best way to sustainably delivering homes and building through the planning process in the context of flood risk. A Level 2 Strategic Flood Risk Assessment will be prepared to consider how the preferred strategy relates to flood risk, to apply a sequential approach to flood risk and to identify any mitigation required.

The Council will work closely with partners, including Essex County Council, the development industry, and Central Government, in considering the best way to deliver the highest possible standards in low-carbon, energy-efficient homes and building through the planning process, striking the right balance between ambition and deliverability. This may include providing the right conditions for innovative solutions to be delivered through the new Local Plan.

The Council will consider the feedback received and will work closely with relevant partners such as Essex County Council, the Essex Climate Action Commission, and the development industry in using the latest measures to deliver policies to ensure

Responses also highlighted opportunities for renewable power generation in the District using its estuaries, coasts and flood plains as sites for tidal or offshore wind power. Solar energy was also seen as having potential, both on new/existing developments and unused flat roofs. The use of agricultural land for solar energy, however, attracted a mixed response.

Place-making and Design

Most comments agreed that a **place-making charter** should be included in the plan with supporting evidence, through local consultation. An over-arching policy was supported with design guides / codes or masterplans for settlements / growth areas consistent with the National Design Guide and National Model Design Code. Comments relayed that emphasis should be on carbon neutrality and environmental sustainability. It was advocated that infrastructure would need to be in place, and supported with evidence, and should not make development unviable. Flexibility was supported by development industry.

Most comments agreed that the principles were right, with further principles to be included. It was advocated that these should be set out in policy, evidenced and costed in a viability study consistent with national policy. Comments indicated that infrastructure; affordable housing; accessibility for all; biodiversity; and net zero homes and businesses would need to be included.

Most comments agreed that **design guides**, **codes or masterplans** inclusive of infrastructure and affordable housing should be created alongside the new Plan giving certainty and setting out rates of delivery and should involve community engagement. Comments advocated that it should be considered as to how they provide additionality to existing design guidance e.g., Essex Design Guide. For medium / small scale development, management policies relevant to urban design and placemaking were sufficient. There was concern that additional work to the Local Plan process would delay housing delivery.

Other Themes

Other themes respondents felt needed to be further addressed were how various community and transport infrastructure would be delivered to support new and

new buildings are built to the highest possible efficiency standards, whilst all opportunities to supply renewable power are explored. It will also monitor closely the ambitions coming from Central Government around the UK achieving 'Net Zero' carbon emissions by 2050, seeking to embed these policies within the local context. These policies will be further developed as the Local Plan process progresses.

The Council considers the draft spatial themes and objectives will help to deliver sustainable development and are in conformity with national policy. These policies will be further developed taking into consideration the objectives of the National Design Guide (MHCLG, 2019) as the Local Plan process progresses. The Council have noted and will consider the comments received when developing future design guides, codes or masterplans.

The Council will undertake an exercise to ensure all key topics are considered in both relevant policies and cross-

	existing communities; a need for an approach to counter climate change , including through better planning of sustainable travel, improved building standards, renewable energy and tree planting; and a greater emphasis on how the environment would be protected and enhanced in the face of significant growth, including protection of habitats, promotion of biodiversity and green infrastructure, air quality, flood mitigation and the loss of Green Belt and agricultural land. Further themes presented as requiring attention included active travel ; waste and recycling ; health and wellbeing ; and culture .	cutting themes at the next stage of the Local Plan process.
Housing for All	A broad mix of comments were made on the different types, sizes and tenures of housing considered to be needed in the District and how best to plan for these, including community consultation. ECC indicated that reference should be made to ECC's Essex Housing Strategy 2021-2025 (2021). Developer /agent commented that consideration should be given to the demographics of the District with flexibility designed into policy ensuring viability. Many comments also indicated that development for housing should only be for specific types, such as all-inclusive and accessible specialist homes, or affordable housing (e.g., Council and starter homes). There was a preference for this type of housing for new developments on both brownfield sites in urban areas and released Green Belt. It was indicated that affordable houses need to be calculated for a given period to avoid lengthy negotiations, and that affordable homes should be provided on site, and for local people. Comments supported the idea that specific sites should be allocated for housing for older people, avoiding competition with general market housing developers, and that infrastructure needs should be considered. Smaller developments were seen by many as being more beneficial.	The Council considers the draft spatial themes and objectives will help to deliver sustainable development and are in conformity with national policy. These policies will be further developed taking into consideration further supporting evidence (including the ongoing South Essex Housing Need Assessment update) as the Local Plan process progresses. The ongoing Housing Need Assessment will provide an up-to-date source of information on the need for different types, tenures, and sizes of local housing. It is expected that the new Local Plan will provide a deliverable strategy for delivering upon this need. The Council have noted and will consider the wider comments received.
	A mix of comments were presented in how to meet Gypsy and Traveller accommodation needs with appropriate sites needing to be identified, outside of urbanised areas. Comments presented some support for both a permanent and transit site, if required. A joint local authority approach was advocated.	The Council intends to review its evidence on Gypsy and Traveller accommodation needs to ensure the preferred strategy provides the best solution to meeting these needs. The
	Comments advocated that criteria-based policy for Gypsy and Traveller sites should include community engagement, location – access to employment, public transport and community infrastructure, exclude green belt land, impacts, avoidance of sites on or	Council will also be mindful of the requirements of Planning Policy for

	near Source Protection Zones, contaminated land and refuse tips, floodplains, protected areas / designations, and landscape character.	Traveller Sites (PPTS) in developing its preferred approach.
	Areas / Sites Requiring Specific Approaches	The Council also remains committed to the ongoing Essex Planning Officer
	Comments specific to the following areas were presented;	Association (EPOA) Transit Site study, to understand the potential need for a
	Hullbridge – affordable housing, inclusive of sheltered older persons housing to the east required.	new transit or temporary stopping site across Greater Essex.
	Rochford and Ashingdon – affordable housing required.	
	Hockley – starter homes required.	
	Stambridge and Canewdon – could accommodate new infrastructure and housing need growth.	
	Town centres – should not be considered for residential development.	
	SSOs 2, 2b, 3a, 4 and a combination of 2 and 4 were advocated by various respondents as being favourable for delivering housing. A dispersed, mixed strategy was also supported with underperforming areas of Green Belt released, alongside development of brownfield land.	
Employment and Jobs	Employment	
JODS	Responses generally felt the Council should protect existing and designate new sites , based on local demand and up to date forecasting. Consultees supported close collaboration with local businesses to identify the types of business accommodation needed and where, including 'start-up' and 'grow-on space', whilst flagship sites such as the Airport Business Park should be ambitious in the types of businesses they attract. There was strong general sentiment that more skilled job opportunities should be provided within the District and that business space provision and skills strategy should be closely integrated to help attract more inward investors and support existing business start-ups and growth. Many also considered much of the District's business accommodation to be dated, poor quality and not suited to the needs of modern	The Council will carefully consider the existing evidence around local and subregional demand for employment space (including known deficiencies such as Grow On Space), as well as commissioning new needs evidence to get a full, up to date, understanding of demand for various types of employment sites and business accommodation over the plan period.

businesses. Representations considered that new and existing employment sites needed to be more flexible, allowing them to adapt to the latest trends and working practices and allowing businesses to easily scale up and down, something which could include co-working space to support start-ups and remote workers in an adaptable, social environment.

An option to require large-scale residential developments to include **new employment space alongside new communities** was popular, reducing the need for new residents to commute. **SSO 3** was seen as a way of achieving this, due to its large scale. It was also noted that many large villages, such as Hullbridge and Great Wakering, lacked significant employment opportunities, leading to large-scale out-commuting. A recognition of changing technological advances and work practices post-Covid ran through many comments, and measures supporting ultra-fast digital connectivity were seen as important, along with a flexible approach to those seeking to run businesses from home, provided they did not impact adversely on neighbours. However, whilst flexibility in employment space was widely supported, there was opposition to the conversion of existing space to residential uses, along with a mixed reception to the prospect of regularising 'informal' employment sites within the District's Green Belt.

As the new Local Plan progresses, emerging draft policies will be formulated in close coordination with key stakeholders, such as the business community, skills providers, and developers.

London Southend Airport

Most responses considered the Airport should be protected as important local resource and economic asset, attracting jobs and investment to the District, although there was some question as to how much further expansion was required, given the dramatic impact of the COVID-19 pandemic on global aviation. It was generally agreed that the Airport's future development should be agreed jointly with Southend Borough Council and other key partners, recognising that the Airport is a major economic and transport asset not just for the District, but for wider South Essex. Although there was general support for the Airport's prosperity, this was tempered by concern from some living close to the site about noise/air pollution and impacts on the local road network, leading to calls for any future growth to be very carefully managed alongside necessary infrastructure improvements. As part of a future Masterplan, the Airport itself suggested the creation of a new public transport interchange adjacent to the existing railway

The Council will work closely with partners including Southend-on-Sea Borough Council, Essex County Council, and the Airport itself, to determine a consistent approach, as far as is possible, which plans for the Airport's continued growth and prosperity, whilst being mindful of the need for balance in terms of environmental and infrastructure challenges. The new Local Plan will need to provide an effective and justified strategy for managing the

	station, improving its sustainable travel connections and providing better connectivity to the local community.	Airport's growth in the context of the economy and environment, as well as reflecting changes in the national approach to airport policy.
Biodiversity	Most comments supported the need for designation and protection of wildlife and geological sites and presented other sites felt worthy of protection. Conclusions of the Local Wildlife Review (2018) were supported, but the site selection assessment may require further review and the potential for bio-diversity net gain needs to be reviewed. It was advocated that the Council should undertake research and identify a suitable pipeline of sites where off-site biodiversity net gains could be made where developments are constrained geographically or by viability or other factors. Biodiversity Net Gain was supported, favouring both on-site and off-site with a broad range of specific locations, sites and projects. Spatial Strategic Options 2a and 2b were supported to provide greater biodiversity net gain. Specific promoted sites were also advocated as capable of biodiversity net gain.	The Council considers the draft spatial themes and objectives will help to deliver sustainable development and are in conformity with national policy. The Council will consider the need to review the existing Local Wildlife Sites Review. The Council expects to prepare technical evidence on biodiversity net gain to ensure the new Local Plan provides an effective strategy for delivering net gain through a combination of on-site and off-site projects, where appropriate. The Council will ensure its new Local Plan meets the emerging legislative requirements of the Environment Act. These policies will be further developed as the Local Plan process progresses. The Council have noted and will consider the comments received.

Green and Blue Infrastructure

Comments supported a range of ways to implement green and blue infrastructure (GBI), including **SSOs 1, 2, 2b and 3**, with some reference to specific locations and sites as ways of achieving this. Some views advocated that implementation of GBI must be balanced against the region's need for growth. Provision of GBI on-site was seen as the best way to mitigate against the local impacts of development and achieve environmental net gain. Comments relayed that strategic opportunities and funding for delivering GBI should be identified and mapped.

New Regional Parklands

Most comments agreed with the areas presented in Figure 32, whilst other areas were also suggested for consideration. It was also stressed that a focus on these areas must not be at expense of GBI delivery and biodiversity net gain on-site. It was suggested the current location and extent of the proposed Regional Parkland [between Southend-On-Sea and the River Roach] should be reconsidered as this would prevent the promoted sites from coming forward for development, meaning homes, education facilities and publicly accessible open space would not be delivered. Alternative areas for consideration were advocated.

The Council considers the draft spatial themes and objectives will help to deliver sustainable development and are in conformity with national policy.

The Council will consider how its emerging strategy can contribute to improvements to the Green and Blue Infrastructure network, including any new regional parkland, as the plan progresses. This will consider the delivery options available to build upon the findings of the South Essex Green and Blue Infrastructure Study and ongoing ASELA work on South Essex's Green and Blue Infrastructure network.

These policies will be further developed as the Local Plan process progresses. The Council has noted and will consider the comments received.

Community Infrastructure

There was a widespread perception from respondents across the District that existing community infrastructure such as healthcare facilities (i.e., hospitals, GP surgeries and dentists), schools and nurseries, were at or exceeding capacity, causing concern at how additional development, homes and new residents might exacerbate these issues. Other community infrastructure and public amenities widely mentioned as in need of attention included police coverage; facilities for teenagers/youths; leisure centres; waste and recycling infrastructure; and cultural facilities. Whilst capacity was seen as an issue for infrastructure in the larger towns, it was also a concern in growing rural villages such as Hullbridge, Great Wakering and Canewdon, where new development was outstripping limited capacity whilst lack of secondary schools in these places meant lengthy journeys for many children. A view that new and existing community

The Council will take these comments into account as the Local Plan progresses and the site selection process narrows down the list of potential sites under serious consideration. The Council will continue to work with Essex County Council and infrastructure providers to understand the implications of the emerging strategy on infrastructure and put in

infrastructure should be linked by a network of walking/cycling and public transport routes was popular.

In terms of **delivering infrastructure**, there was considerable scepticism that new development would be accompanied by the required improvements and new facilities to mitigate the impact, with recent housing developments widely given as examples where the expected schools and surgeries had not been built. As a consequence, the prospect of further urban extensions (i.e., SSO 2) was not popular. Requiring new developments to deliver community infrastructure on-site attracted strong support, with large-scale 'garden villages' under SSO 3 seen as having the potential to deliver new infrastructure which would take the burden away from services in existing communities. New communities under SSOs 3a (West of Rayleigh) and 3b (North of Southend) were seen as having potential to deliver additional infrastructure by working across boundaries with neighbouring local authorities.

There was frustration that recipients of Section 106 funding (e.g., ECC or NHS) do not always spend it in a timely fashion, leading to doubt that the future Local Plan will manage to deliver meaningful infrastructure alongside housing. Some from the development industry would welcome the introduction of a Community Infrastructure Levy (CIL) to simplify the process of developer contributions and provide greater transparency. There was also a view that certain communities may benefit from colocation of services in existing underused facilities such as libraries, halls and on school sites, something which could reduce the cost of providing new infrastructure and services.

place effective measures to secure the infrastructure necessary.

Prior to submission of the plan, an Infrastructure Delivery Plan will be published, identifying the infrastructure improvements which would need to be delivered in order to mitigate the impact of development on the District, whilst improving the lives of residents and businesses.

There remains an option for the Council to pursue a Community Infrastructure Levy (CIL) should it be considered necessary to deliver infrastructure. The Council however also acknowledges the speculation that a new national levy may be introduced on development which may replace the existing CIL mechanism.

Open Spaces and Recreation

The creation/designation of more parks and open spaces was widely supported, with the recent lockdowns underlining the importance of these to people. However, respondents wanted more firm detail of the types of spaces that could be delivered, along with their locations. There was widespread concern that the promotion of Green Belt sites for development could be counterproductive by reducing open space and affecting popular public rights of way. A wide range of promoted sites across the District were put forward by developers as having the potential to provide new public open space or recreation/play areas either within their boundaries, or by contributing to

The Council considers the draft spatial themes and objectives will help to deliver sustainable development and are in conformity with national policy. These policies will be further developed taking into consideration in the emerging Open Spaces Study which will expand supporting text to reflect

	facilities elsewhere. Proposed options for a network of 'hub' sites at schools, along with 3G pitches, were generally supported, with some caveats. The proposed list of Local Green Spaces put forward by the Council for official designation was supported. However, many considered that a wide range of additional sites across the District were worthy of protection, including several sites being promoted for development (see Complete Communities summaries in this section, along with question responses in Appendix 5 for further detail).	recent evidence gathering and policy approach as the Local Plan process progresses. The Council have noted the additional suggestions put forward for local green space status and will consider whether the suggested spaces meet the national definition sufficiently to be included.
Heritage	Comments presented a broad range of heritage protection strategies as well as identifying specific heritage / historical spaces, structures, sites and locations that were considered as in need of protection. Updating the evidence base was supported, inclusive of a refreshed Local List to consider and assess impacts of proposed growth on heritage assets. It was considered the Local List should be updated with local consultation. Updating Conservation Area Appraisals was advocated as part of the Local Plan process due to settlement and area changes over time, with a need for these to be regularly reviewed. Undertaking Heritage Impact Assessments was supported for sites considered for allocation, where heritage issues have been identified. Consideration of SSOs with no / limited heritage constraints was also supported.	The Council considers the draft spatial themes and objectives will help to deliver sustainable development and are in conformity with national policy. The Council will work with stakeholders including Essex County Council Heritage Team and Historic England to seek guidance to further develop and inform policies for new development as the Local Plan process progresses, including to undertake a comprehensive heritage assessment of any future development allocations. The Council have noted and will consider the comments received.
Town Centre and Retail	There was a general sense that market forces and consumer preferences were shifting towards online retail and convenience, and that the District's town centres needed to have variety, flexibility and accessibility to attract both new and existing shoppers, and also a greater share of evening and leisure trade. Town centres were seen as becoming places for socialising and recreation, and policies needed to support businesses to adapt and offer new experiences, e.g., through improving public realm; providing facilities to enable 'pop-up' retail; co-locating public services; and providing flexible workspace for start-up businesses. Most did not express a preference between creating new masterplans/area action plans, or whether these were dealt with by policies within the new LP, although there	The Council will consider feedback received and the existing and updated evidence base to determine the best course of action to ensure the District's town centres and retail areas remain vibrant. An updated retail needs assessment will be prepared prior to the next stage of the new Local Plan to ensure the Council has an up-to-date

was a narrow preference for the latter option. However, whilst flexibility was supported, understanding of the future need for responses generally supported the retention of town centres for commercial uses. retail and leisure space across the Whilst developers supported the idea of more housing in town centres (which could District, including in town centres. This form part of SSO 1) as a way of increasing footfall, this was generally opposed by improved understanding of need may residents, particularly where it involved the conversion of commercial units to support future interventions such as residential through permitted development, feeling this would irreversibly change the Article 4 directions or character of such areas, break up shopping frontages and undermine their role as revisions/extensions to shopping shopping and community hubs. frontage policies. Many responses favoured an approach that celebrated the unique characteristics and heritage of Rayleigh, Rochford, and Hockley to encourage new independent businesses, alongside protecting and enhancing existing community and cultural facilities. It was felt that improving walking, cycling and public transport access to town centres, along with protecting and enhancing parking facilities, was crucial. The importance of protecting and enhancing neighbourhood parades and village centres was stressed, particularly in places experiencing growth such as Hullbridge and Great Wakering. In terms of the SSOs, developers supported **SSOs 1 and 2** as a way of bringing new customers to existing centres, whilst SSO 3 was more widely supported as an opportunity to provide new retail and leisure facilities to serve communities and reduce the need to travel. **Transport and** Most comments presented a range of transport issues e.g., connectivity, and The Council considers the draft spatial congestion, that need to be addressed at both District and local level. Many comments themes and objectives will help to Connectivity expressed concern at the existing capacity and condition of roads and other forms of deliver sustainable development and transport, whilst many presented issues with specific promoted sites which were are in conformity with national policy. considered would have a negative impact on transport infrastructure. A mix of strategic options were both supported and objected to, with objections to development and The Council is preparing a transport suggested interventions. SSOs 3a and 3b West of Rayleigh were well supported as assessment to support its emerging plan, which will carefully consider the means of delivering new transport infrastructure and preventing congestion in existing settlements. implications of different scenarios and provide a model-led approach to Suggestions for evidence studies required to support a comprehensive response to assessing the impacts of any preferred transport improvements within the New Local Plan included an Infrastructure Delivery approach, including identifying any mitigation needed. The Council will Plan / Strategy (with local consultation) and infrastructure committed to ensure new

	development delivers improvements to transport networks; Transport Study , once there is clarity on cross-boundary issues, e.g., housing to enable planning of infrastructure, and a Road Safety Analysis . An appraisal question was also advocated to consider whether a strategic option promotes the use of sustainable transport modes allowing for an assessment of the extent to which a proposal meets the Health and Wellbeing IIA Objective. Comments presented that growth should be directed / dispersed to the most sustainable locations (existing settlements) already well-served by high frequency public transport, services and facilities, where there is the opportunity to deliver a scale of development to sustain new services and facilities to deliver walkable neighbourhoods. It was also suggested that improvements could be made to make less sustainable locations more accessible. Better District-wide provision of comprehensive walking/cycling infrastructure, along with improvements to the public transport network, were widely supported.	work with stakeholders including Essex County Council Highways to seek guidance to further develop and inform robust policies for new development as the Local Plan process progresses. The Council have noted and will consider the specific comments received.
Green Belt and Rural Issues	It was recognised there was a need in rural areas for housing, but that such housing should be specifically for the needs of local residents, be small-scale, and affordable or social in nature. Places mentioned as possible locations for rural exception sites by respondents included East Hullbridge, Canewdon, Paglesham, Rawreth, Stambridge and South Fambridge. A need for providing elderly housing or care facilities in rural areas was also identified. Essex County Council noted that a number of rural exception sites in places such as Stambridge, Canewdon, Paglesham and Ballards Gore could provide an opportunity to secure improvements to the bus network serving the area. Whilst the concept of rural exception sites to meet the needs of the local community were generally supported, there was some unease at developing the Green Belt to do so, whilst some comments opposed any further development, feeling it would result in a loss of the character and tranquillity that made rural communities special. Infrastructure was a high priority, with rural communities having very little in the way of community or transport infrastructure, meaning such places could not support further growth without significant investments. The very limited nature of public or sustainable transport and poor state of rural roads were flagged as part of this. Several views received during the consultation did not feel the Document made sufficient reference to agriculture and farming when considering future policy options,	The Council will work with local communities, Parish/Town Councils, and partners such as Essex County Council to consider how the new Local Plan can meet the needs of rural communities, including to understand how the plan can support the provision of housing and infrastructure to meet the needs of local, rural communities.

	as this would support food security/self-sufficiency and keep rural identities strong, as well as ensuring younger generations continue to work in farming. Measures to support this could include support for additional agricultural development, or the provision of allotments in rural villages. Planning for Complete Communities	
Rayleigh	Most responses disagreed with the vision for Rayleigh and advocated the need for greater protection from development. Themes of infrastructure (including green infrastructure); sustainability; heritage; employment; commercial; retail, and concerns for housing development impacts were well commented upon. Those objecting to housing development did support development for infrastructure. Comments supporting housing development favoured Strategic Option 3a (including concentrated growth West of Rayleigh due to proximity to main road and rail network) and 3b. Some comments supported housing development on brownfield sites that did not have impacts on the local community. Most respondents agreed that local green spaces hold local significance. Open Spaces that also hold significance were presented, mainly due to informal recreational uses (footpaths, bridleways, connectivity and wildlife). No additional green spaces identified as having local significance.	The Council considers the draft vision will help to deliver sustainable development and is in conformity with national policy. The Council has noted and will consider the comments received when revising the settlement vision for Rayleigh.
Rochford and Ashingdon	Wision / Development Most respondents did not agree with the vision and supported protecting farmland and green belt from development. Common themes being presented included infrastructure; over-development; local housing need; economic growth; sustainability; landscape; demographics, flooding and heritage. Most respondents objected to land being made available for any development. Comments that supported the use of land presented a mix of housing and infrastructure uses with reference to specific sites, brownfield and Strategic Options. Strategic Options 2b and 3a were supported.	The Council considers the draft vision will help to deliver sustainable development and is in conformity with national policy. The Council has noted and will consider the comments received when revising the settlement vision for Rochford and Ashingdon.

	Most respondents agreed that local green spaces hold local significance. Some comments presented other spaces that hold local significance.	
Hockley and Hawkwell	The vision attracted significant opposition, with many concerned that retaining village character and being the gateway to the 'green lung' of the Upper Roach Valley were at odds with the scale of promoted sites. Objections on grounds of overdevelopment; loss of Green Belt, habitats, and open space; the capacity of existing transport and community infrastructure; and potential effects on air quality. A deep desire to preserve local open spaces, ancient woodlands, nature reserves, public rights of way and Green Belt ran through responses. Promoted sites close to these spaces were seen as important buffer zones and wildlife corridors for habitats including Hockley Woods, Beckney Wood, Plumberow Mount, Gusted Hall Woods, and Marylands Nature Reserve. Many were also valued for their roles in preserving the area's semi-rural character; agricultural value; openness; and for their role in promoting recreation and well-being through public rights of way. Promoted sites in the semi-rural areas surrounding Hockley Woods in the Upper Roach; sites between Folly Chase and the railway line; sites between Clements Hall and Rectory Grove; the site adjoining Maryland Nature Reserve; and the network of sites either side of Greensward Lane; were strongly opposed.	The Council considers the draft vision will help to deliver sustainable development and is in conformity with national policy. The Council has noted and will consider the comments received when revising the vision for Hockley and Hawkwell.
	It was recognised that some housing was needed to help locals access the housing ladder, but this should be done in a sustainable way. The capacity of local roads was a major concern, particularly the B1013, whilst public transport and cycle network provision in the area was felt to be very poor, leaving few realistic alternatives to car travel. Those supporting the vision felt that Hockley should retain its character and status as a gateway to the District's open spaces, meaning any development needed to be proportionate, with smaller 'infill' developments and previously developed sites, such as Rawal Pindi Nursery, preferred. Hawkwell-specific issues included a desire for additional retail/community infrastructure and recreation spaces, and a sense that the village was being subsumed into wider Hockley/Rochford and losing its identity.	

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	L.V. 'en / Development	The Occupitation that does to be a
The Wakerings and Barling	Few supported the draft vision, with its aim of retaining rural village character and relative tranquillity seen to be contrary to the potential scale of development if promoted sites were developed. Locals strongly valued the rural character of the villages, along with their accompanying agricultural land, hedgerows and natural habitats. There was a concern that additional development in Great Wakering would transform it from a village into a town, risking merging with Southend or Rochford. Many in the smaller villages prized the peace and tranquillity of rural life and did not wish to see this change, even if this led to enhanced infrastructure. There was concern at the capacity of existing infrastructure, i.e., primary schools, nurseries, and the health centre, to cope with further development. A local secondary school, facilities for young people and waste & recycling facilities highlighted as being urgently required in the area. Local transport was widely felt to be inadequate, comprising narrow, rural roads, a limited bus service and little walking and cycling infrastructure, giving few alternatives to driving. The dispersed nature of the villages meant many used cars to get to Great Wakering and the prospect of further traffic raised safety and congestion worries. The need for children to travel to Rochford for secondary school exacerbated this situation. Some considered that recent housing schemes were more than enough for the village and that the area had already accommodated its fair share of District's growth. It was felt these schemes had not delivered infrastructure improvements to mitigate the increased demand they had placed on local services and roads. Some considered housing was required, but this should be specific to local needs and sympathetic to the rural character. Development needed in the area included improved community infrastructure (including a secondary school) and further employment and shopping facilities, helping residents to travel less.	The Council considers the draft vision will help to deliver sustainable development and is in conformity with national policy. The Council has noted and will consider the comments received when revising the vision for the Wakerings and Barling.
Hullbridge	Vision / Development Most respondents did not agree with the vision for development and objected to most of the sites presented, calling for protection. Themes being presented included community consultation; infrastructure; flooding; environment; wildlife; housing; green belt; Coastal Protection Belt; lack of accessible open spaces; loss of footpaths,	The Council considers the draft vision will help to deliver sustainable development and is in conformity with national policy. The Council has noted and will consider the comments

	bridleways and farmland, and settlement coalescence. It was advocated that a full infrastructure study was required. It was commented that more development will not enhance quality of life, and that more houses require more amenities, roads/buildings/traffic, meaning the village disappears and the character of the area is forever lost. Development on brownfield sites and land East of Hullbridge attracted some support. Sites outside of Hullbridge were preferred. Areas within the current green belt boundary, or bounded by existing residential development were supported as this land	received when revising the vision for Hullbridge.
	would be unable to perform the 5 purposes of the green belt. Strategic Option 3 was supported for delivery of open space. Most respondents agreed that the local green spaces on Figure 48 hold local significance. Other spaces also considered were presented e.g., footpaths and green belt land.	
Canewdon	Vision / Development Comments expressed concern for the loss of village character and that development should be proportionate. Other themes presented included wildlife, landscape, housing and commercial development, and community infrastructure. Few sites were supported for housing development.	The Council considers the draft vision will help to deliver sustainable development and is in conformity with national policy. The Council has noted and will consider the comments received when revising the vision for Canewdon.
	Most comments agreed that the local green spaces proposed on Figure 49 held local significance. Comments indicated a few other sites that should be considered, and that all green belt sites held significance.	
Great Stambridge	Vision / Development Most respondents objected to the vision, expressing that future development would contradict the vision. Impacts on community infrastructure, roads and environment was a concern. Support was given for development of community infrastructure for open space including bridle and foot paths, and for a doctors surgery within the village. There was support for some housing and commercial development as a logical extension to the settlement. Development was also considered acceptable for	The Council considers the draft vision will help to deliver sustainable development and is in conformity with national policy. The Council has noted and will consider the comments received when revising the vision for Great Stambridge.

	wind/solar farms, agriculture, or wildlife / nature reserves. Comments advocated	<u> </u>
	protection from development due to historical and landscape value.	
	Most comments agreed that the green spaces proposed on Figure 50 held local significance. All green belt, particularly that bounding the village was also considered significant.	
Rawreth	Most respondents objected to the vision with comments presenting proposed development impacts on green belt, agricultural land, and infrastructure. Support for large scale development was expressed for sites to the East of Wickford, as this could provide new infrastructure and employment. Other specific sites were also supported for environmental quality, e.g., improved recreation uses, and land along the north side of the A127 and close to the A130 for sustainable development for housing and infrastructure. Some comments indicated that protection from development was required due to flooding, green belt areas and for Rawreth generally from urban sprawl. Whilst some respondents agreed that the local green spaces proposed on Figure 52 held local significance, a stronger sentiment was that all green areas hold significance due to their value to the community'.	The Council considers the draft vision will help to deliver sustainable development and is in conformity with national policy. The Council has noted and will consider the comments received when revising the vision for Rawreth.
Paglesham	Whilst there were very few respondents to this element, it was advocated that retaining green belt would protect Paglesham's character. Comments objected to development and insisted any proposed development must engage with local community. Whilst some respondents agreed that the local green spaces proposed on Figure 53 held local significance, a stronger sentiment was that all green areas hold significance due to their value to the community'.	The Council considers the draft vision will help to deliver sustainable development and is in conformity with national policy. The Council has noted and will consider the comments received when revising the vision for Paglesham
Sutton and Stonebridge	Vision / Development Most respondents disagreed with the vision, with comments citing lack of community consultation as a key reason. Comments advocated the area remaining rural, although	The Council considers the draft vision will help to deliver sustainable development and is in conformity with national policy. The Council has noted

	improvements to connectivity and amenities would be welcome. Themes being presented included lack of infrastructure, accessibility, and open spaces. Several comments supported development for large scale growth, Strategic Option 3b – north of Southend (for housing, infrastructure, employment, and open green space). Comments also objected to development on green belt and that protection from development was also required due to risks of flooding, air quality and loss of village identity, habitats, and agricultural land. Some respondents agreed that the local green spaces shown on Figure 54 held local significance, but that green belt also held local significance in preventing urban sprawl.	and will consider the comments received when revising the vision for Sutton and Stonebridge.
Rural Communities	Vision / Development Some respondents disagreed that rural communities did not require their own visions whilst other comments advocated that they did require visions due to their uniqueness and should be protected. It was also advocated that communities should decide their own visions. Some respondents agreed with the vision presented for rural communities, but that greater priority should be given to wildlife and farming land. Actions being presented included, community consultation, retaining green belt, alternative ways to meet housing provision, active travel (footpaths etc), utilisation of pubs to meet community needs, and improvements to infrastructure.	The Council considers the draft vision will help to deliver sustainable development and is in conformity with national policy. The Council has noted and will consider creating individual visions for rural communities where appropriate.

5 Key Report Headlines

5.1 This report presents a broad range of findings based on the large number of questions asked in the Consultation Document, summarised by broad elements in chapter 4 and presented in further detail in Appendices 3 and 4.

Headline 1: Responses and Respondents Breakdown

- 5.2 In total, **6,839** individual responses were received to the wider consultation and its constituent components. Of these, **6,818** related to the main Spatial Options Consultation Document, whilst the Statement of Community Involvement and Integrated Impact Assessment received 11 responses, and 10 responses respectively.
- 5.3 Responses came from a total of 1,535 separate submissions. These respondents comprised a wide range of different stakeholders, including local residents/businesses; agents/developers/landowners; town and parish councils; statutory/non-statutory organisations and trusts; and local residents' groups. Table 5 below provides a breakdown of the various types of respondents (please note this refers to 1,514 respondents to the main Spatial Options Consultation, rather than to the accompanying SCI and IIA questions.

Table 5: Number of Responses by Type of Respondent

Туре	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

5.4 Although the majority of responses represented the views of one individual or organisation, a number stated that their responses represented the views of a collective of people (e.g., family units or groups of residents). In total the 1,536 responses represent a total of **1,814 separate individuals**. Through the course of this report, the number of individuals represented is included alongside the

representation count, giving a further indication of numbers responding to the various options and themes.

Headline 2: Spatial Strategy Options

- One of the key aims of this consultation is to explore a range of 'Spatial Strategy Options' (SSOs) for accommodating the District's growth requirements, as outlined in the Document. 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
- 5.6 A total of 358 responses were made to the corresponding question (Q.6), representing 419 individuals, making this the most-answered question within the Document (although views on specific promoted sites within a number of settlements attracted more representations). Given the open-ended nature of the question, a broad range of responses were received, as indicated below in Table 6 and Figure 3. 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).
- 5.7 In addition, a number of respondents supported a generic strategy option, without going into detail on the spatial location (e.g., a number of respondents supporting a 'garden village' approach under **Option 3**, without specifying the location). To reflect the range of answers given, where a second preference was provided, this was also recorded.

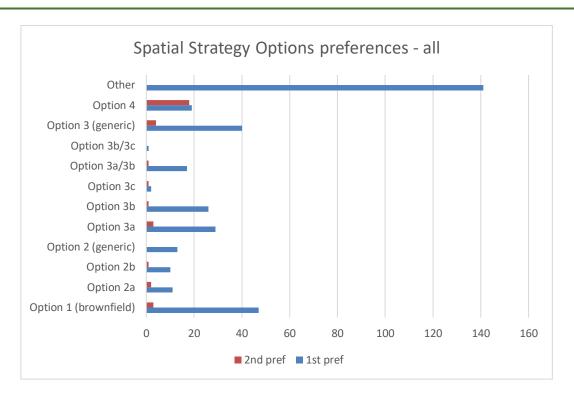
Table 6: SSO Preferences (all respondents)

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

In first preferences, the single largest category was 'Other', representing a wide range of different views. With regard to 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).

Figure 3: SSO Preferences (All)



5.9 When merging the different sub-options and adding together both 1st and 2nd preferences as set out in Table 7 and Figure 3, there is a strong preference for a concentrated option. However, it is important to recognise that the number of individuals indicating support for these options is still only a small minority of the total number of respondents to the consultation.

Table 7: 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

5.10 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. 'Other' comprised the following broad categories of response:

- 5.11 No development: a significant number of representations within this category considered that further development should not take place within Rochford District. Reasons given for this 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.
- 5.12 **Infrastructure-first:** many responses did not object to the principle of further growth, with some recognising the need for more housing. However, this category 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.
- 5.13 **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).
- 5.14 **Statutory Responses:** A range of consultees responded to this question, including Essex County Council, neighbouring local authorities, the NHS, and Anglian Water. These views tended not to favour a particular option but gave broad outlines of how capacity of various infrastructure or services would be required to keep pace with development. The exception to this was where local authorities expressed views on particular SSOs, e.g., Castle Point and Southend-on-Sea supporting further consideration of **Options 3a** and **3b** respectively, or Basildon's opposition to **3a** (at the time of comment, this proposal did not align with the Basildon Emerging Local Plan, subsequently withdrawn in February 2022). At this early stage of the Local Plan process, responses gave a general commitment to work closely with the Council to address further relevant details as they emerged.
- 5.15 Although an open-ended question was presented requesting views on various SSOs, a significant number of respondents used their response to generally 'object' to the new Local Plan, with 125 responses (35% of total) being recorded against the 'object' as opposed to the 'support' option.

Preferences Amongst Individuals

5.16 Of the 358 respondents to Question 6, 297 (83%) were individuals, mostly local residents and businesses. 33 (9%) were received from landowners, developers and agents. 6 (1.7%) were received from parish and town councils and other local

authorities, whilst 2 (0.06%) were received from interest groups/trusts and public bodies respectively. Amongst representations received from landowners, developers and their agents, there was a strong preference (21 responses (64%)) for **Option 2** strategies, indicating that the majority of these responses focused on promoting individual sites and expediting their intended development.

5.17 When analysing the 297 responses received from **individuals** - i.e., residents/businesses (see Table 5 and Figure 2), a total of 108 (36%) favoured **Option 3** strategies as 1st preference, whilst just 2.7% supported **Option 2**.

Table 8: SSO Preferences for Individuals (All)

Spatial Strategy Option	1 st Preference	2 nd 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

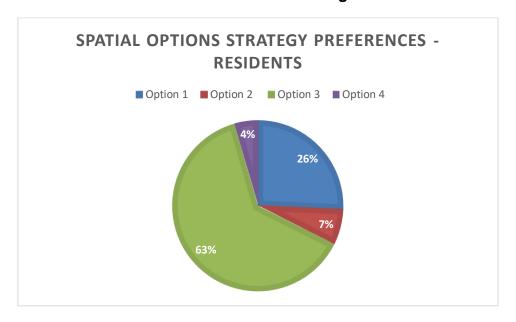
5.18 When looking at combined 1st and 2nd preferences, **Option 3** is similarly popular, constituting 63% of respondents. This is displayed in Table 9 and Figure 4, below:

Table 9: SSO Preferences for Individuals - Merged

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

Figure 4: SSO Preferences for Individuals - Merged



Preferences Amongst Development Community

5.19 As shown below in Table 10, 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 10 and Figure 4), the most widely supported option was **Option 4**. This reflects a degree of pragmatism in many representations, where it was 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. Variations of **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 10: SSO Preferences for Development Industry (All)

Spatial Strategy Option	1 st Preference	2 nd 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 11: SSO Preferences for Development Industry- Merged

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

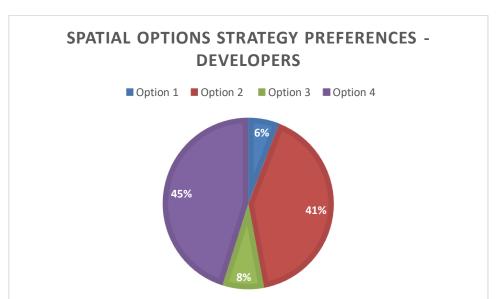


Figure 5: SSO Preferences for Development Industry – Merged

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Appendix A

<u>Preferences Amongst Other Respondents</u>

- 5.20 Other categories of respondent also gave preferences on SSOs. Regarding parish and town councils, views were mixed. 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**. These respondents agreed that focusing on brownfield sites should be explored before other options. Canewdon Parish Council supported Option 2b, which would see the village taking some development in proportion to its existing size. Other local authorities had differing views, which were influenced by their proximity to Rochford and how their own unmet housing need might be accommodated within the District, and also by how development within the District might impact upon their own infrastructure and strategic priorities. This was seen with Option 3a, which Southend Borough Council and Castle Point Borough Councils noted may be worth exploring, whilst Basildon Borough Council voiced opposition on the basis of impact on infrastructure in Wickford and its perceived incompatibility with their then draft Local Plan. Option 3b was also noted by Southend Borough Council to have considerable potential in forming part of a crossboundary proposal to meet joint housing needs. Essex County Council's response focused on Strategy Options which could provide the required levels of growth and infrastructure, favouring approaches based on Options 3 and 4 as a result.
- 5.21 For further information see paragraphs 4.1 and 4.2, and Appendices 3 and 4.

Headline 3: Infrastructure First

- 5.22 One of the most common themes prevailing through the large number of individual representations received 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.
- 5.23 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. In addition, utilities (Water, sewerage, electricity etc) were widely cited as infrastructure requiring upgrading.
- 5.24 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. 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.
- 5.25 Consequently, many backed approaches along the lines of SSO 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.
- 5.26 The issue of waste management was a District-wide issue, with the existing facility in Castle Road, Rayleigh considered inadequate by some for the level of demand and difficult to access given its location in a constrained urban location, a considerable drive from communities in the East of the District.
- 5.27 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

- 5.28 Another strong thread running through consultation responses was the perception 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.
- 5.29 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.
- 5.30 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 all privately-owned farmland, fields, and wooded areas, 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 the distinctive rural/semi-rural character that made it special. There was also strong feedback that agricultural land should be valued for its multiple roles in food provision and wildlife preservation, and that specific policies should be in place to protect it.

Headline 5: Climate Change and Sustainability

- 5.31 An awareness of climate change impacts 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. 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 as a consequence of climate change and increase in extreme weather conditions. Vulnerability to climate change effects such as flooding was a common concern and was widely raised in objection to promoted sites.
- 5.32 To mitigate these issues, feedback generally advocated high energy efficiency standards on buildings, 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.
- 5.33 Transport was also central within feedback received on sustainability, with many responses stating that new housing developments were likely to generate significant additional car journeys, generating both significant amounts of carbon emissions and air pollution, both of which were 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.
- 5.34 To counter these issues, comments supported brownfield development (reducing the need to travel by car), widespread inclusion of electric vehicle charging infrastructure in new developments, along with the widespread retention and planting of trees 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. Finally, 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, mitigating congestion and carbon emissions.

Headline 6: Local Green Space Designation

- 5.35 Alongside the key questions regarding SSOs and other broad themes which will underpin future Local Plan policies, 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*.
- 5.36 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).
- 5.37 Within the Document, the Council put forward 45 sites proposed for designation, 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.
- 5.38 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 those detailed in the following paragraphs.

- 5.39 A large 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, such as Belchamps Scout Centre, Hawkwell widely opposed as a development site due to its value for local youth. There were also suggestions that some of these sites should be designated as nature reserves or recreation space.
- 5.40 Parts of urban promoted sites were also considered locally significant, including the garden areas with the Mill and Civic Suite complexes in Rayleigh, both of which attracted calls for protection.
- 5.41 Large sites such as Cherry Orchard Country Park and Hockley Woods were also proposed to be locally significant. These would not meet LGS criteria due to their size but would already be considered protected under various designations.
- 5.42 A number of public open spaces not currently proposed within the LGS list were also put forward, e.g., Edwards Hall Park. In addition, the District's network of public rights of way, along with the entire sea wall, were suggested to be important to protect.
- 5.43 Sites proposed on Foulness Island, within the Ministry of Defence Estate, were not considered appropriate for LGS designation by the Defence Infrastructure Organisation, given the restricted nature of access on the island.
- 5.44 The additional sites proposed for LGS designation will be considered as the Local Plan is progressed in future stages.

Headline 7: Draft Integrated Impact Assessment (IIA)

- 5.45 The Draft IIA was compiled to support the Rochford 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.
- 5.46 10 respondents to the Draft IIA were recorded as detailed in Table 13 below:

Table 13: Responses by type to the Draft IIA

Respondents	Support	Object	Comment
10	2	1	7

- 5.47 Of those responding, 6 representations represented agents, developers, or landowners; 2 were from local residents; and 1 each came from a neighbouring local authority and a statutory consultee.
- 5.48 Whilst comments did indicate that the assessment was overall a good assessment, there were concerns for 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.
- 5.49 A combination of brownfield and greenfield sites was advocated to meet housing need, making use of sustainable locations.
- 5.50 Improving the affordability of housing for local residents 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.
- 5.51 An appraisal question was also advocated to consider whether a Strategic Option promotes the use of sustainable transport.
- 5.52 It was suggested that an appraisal question was also needed to ensure that the priorities of the Essex and Suffolk Shoreline Management Plan were considered.
- 5.53 Overall, comments indicated a preference for the IIA options of medium or higher levels of growth as opposed to the option for lower growth. Whilst the latter 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 levels of growth were 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.

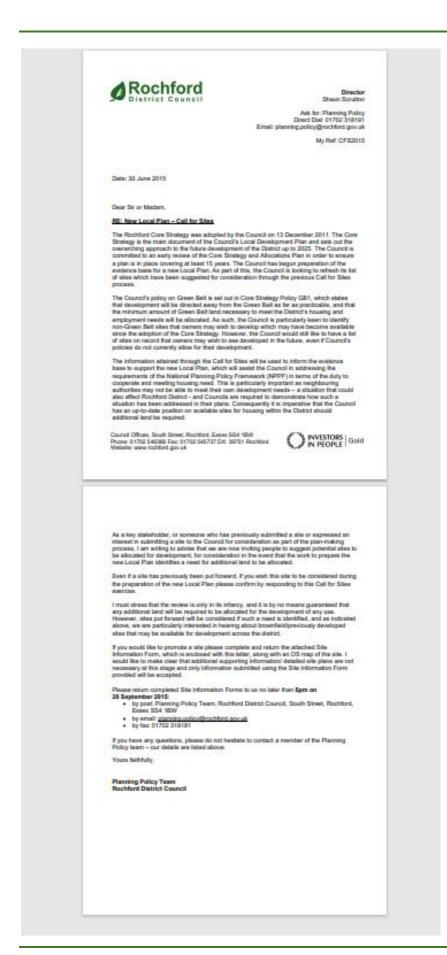
6 Next Steps

- 6.1 The Spatial Options consultation is not the last opportunity interested parties will have to shape the strategy and direction of the Rochford New Local Plan.
- 6.2 As the New Local Plan progresses, the key themes raised through the consultation will be taken into account and inform the decisions that are made on the strategy, vision, and policies of the plan.
- 6.3 The Council continues to develop the technical evidence base that sits behind the New Local Plan and will take into account the comments received on potential gaps in this evidence base or any opportunities that require further assessment.
- 6.4 The Council will also continue to work with a range of partners including Essex County Council, adjoining local authorities, infrastructure providers and other statutory consultees to ensure that the implications of potential strategy and policy options on the local economy, environment, society, and infrastructure are well understood and given proper weight in decision-making.
- The Council intends to hold two more stages of public consultation on its new Local Plan before submitting it for Examination. The next stage will be the **Preferred Options** stage, which will contain the strategy and policies that the Council prefers over alternatives. The development of the Preferred Options will be informed by feedback received at this stage.
- 6.6 The Council maintains a public timetable for its new Local Plan called the Local Development Scheme. This is published online and updated as required to provide an up-to-date timetable for future stages of public consultation.

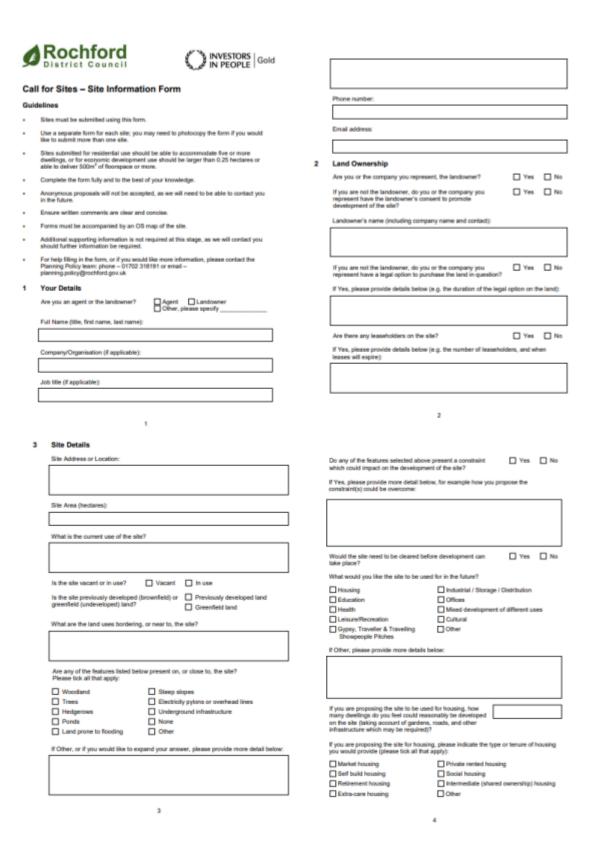
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Appendix A

Appendix 1: Call for Sites Letter and Response Form



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	If Other, please provide more d	fetails below:			1		If Yes, please provide more details below:
4	Site Access						
	Does the site front a road?		☐ Yes	☐ No			
	If Yes, please state which road(s):					_	614 M
						6	Site Map This form must be accompanied by an OS map of the site which clearly shows the site
	Would existing buildings need to the site?	to be demolished to gain access	☐ Yes	□ No	,		boundary edged in red and at least two named roads to help identification of the site's location. The map should be A4 or A3 in size and should be clearly labelled with the site's name and location, and your name and contact details. If only part of your land is being submitted, any other land in your ownership or control should be
	Do you own, or have unrestrict proposed access to the site?	ed rights over, the existing or	☐ Yes	□ No			your statu's overlag sootmister, any ourse same in your ownership or consists should be edged in blue. If there is more than one landowner for the site, these should be clearly defined on the map. A signed statement from each landowner confirming their agreement for the Council to consider the site for future development should be
	Would the occupiers of the new rights to the site?	v development have full access	☐ Yes	☐ No		7	supplied with the map. Agreement
5	Site Availability						I confirm that I have completed this form to the best of my knowledge, and that my personal information may be held by the Council in accordance with the requirements
	Can you confirm that you, as the individual representing the land promote the site for development.	fowner, would be willing to actively	☐ Yes	☐ No			of the Data Protection Act 1998 and used for planning policy purposes.
	Has the site received any interest	est from developers?	☐ Yes	☐ No		Signe	ned Date:
	When will the site become available	ilable for development?					
	Site is available now 0-5 years 6-10 years	11-15 years 16-20 years 20+ years					Thank you for completing this questionnaire
		egarding the site that you wish to	☐ Yes	☐ No			
	bring to the attention of the Loc	al Planning Authority?					sse return completed forms and maps before 5pm on 31 March 2017 to the nning Policy Team, by:
						Email	t: Rochford District Council, South Street, Rochford, Essex. SS4 1BW all: planning.policy@rochford.gov.uk : 01702 318181

Appendix 2: Examples of Promotional and Publicity Activity

This appendix includes examples of the promotional and publicity activity that took place during the consultation window.

Social Media

Social Media Thematic Posts

Theme	Platform	Content	
Theme General	Platform Facebook/LinkedIn	Content Help us tackle the key spatial challenges and opportunities facing the District over the next 20 years and beyond, in this key stage in developing our new Local Plan! Rochford District's Spatial Options Consultation is now open – the Council is now seeking your input on how best to set future planning strategy to address key questions on themes such as placemaking and design, climate change, housing for all, employment and jobs, transport and connectivity, heritage, biodiversity and open spaces.	A A A A A A A A A A A A A A A A A A A
		Portfolio Holder for Strategic Planning, Cllr Ian Ward, said, "Planning decisions made now will affect us all, over the next 20 to 30 years. That's why this consultation is crucial to ensure we can make those long-term plans for new infrastructure, homes and jobs, whilst making meaningful improvements to our natural environment to benefit our towns and villages. I would urge all residents to get involved and help us shape our future together".	
		The consultation runs until 5pm on 8 th September. Find out more here: https://rochford.gov.uk/spatialoptions	
General	Twitter	Help us tackle the key spatial challenges and opportunities facing the District over the next 20	

		years and beyond, in this key stage in developing our new Local Plan! Find out more here: https://rochford.gov.uk/spatialoptions	
Housing; Placemaking & Design	Facebook/LinkedIn	How do we ensure local people are able to afford their own homes and that the right housing is available at all stages in life? Rochford District's Spatial Options Consultation is now open and we are consulting on the best options for providing well-designed homes that meet the needs of Rochford District residents now and in the future, creating sustainable communities backed with the required infrastructure. Portfolio Holder for Strategic Planning, Cllr Ian Ward, said, "Planning decisions made now will affect us all, over the next 20 to 30 years. That's why this consultation is crucial to ensure we can make those long-term plans for new infrastructure, Jognes and jobs, whilst making meaningful improvements to our natural environment to benefit our towns and villages.	

		would urge all residents to get involved and help us shape our future together". The consultation runs until 5pm on 8 th September. Find out more here: https://rochford.gov.uk/spatialoptions	
Housing; Placemaking & Design	Twitter	We're consulting on the best options for providing well-designed homes that meet the needs of Rochford District residents now and in the future, creating sustainable communities backed with the required infrastructure. Find out more here: https://rochford.gov.uk/spatialoptions	

Biodiversity; Green/Blue Infrastructure; Climate Change	Twitter	How can we plan for sustainable development over the next 20 years that respects and enhances Rochford District's vital green and coastal landscapes, and mitigates the effects of climate change? Respond to our consultation now! https://rochford.gov.uk/spatialoptions	
Biodiversity; Green/Blue Infrastructure; Climate Change	Facebook/LinkedIn	What do we need to do to balance the pressures of our growing communities with the rural and coastal nature of much of the District, to preserve our precious natural habitats and ecosystems for future generations? Rochford District's Spatial Options Consultation is now open and we are consulting on the best options to plan for sustainable development over the next 20 years and beyond that respects and enhances Rochford District's vital green and coastal landscapes, protects natural habitats and mitigates the effects of climate change. We need your views and feedback! The consultation runs until 5pm on 8th September. Find out more and respond here: https://rochford.gov.uk/spatialoptions	

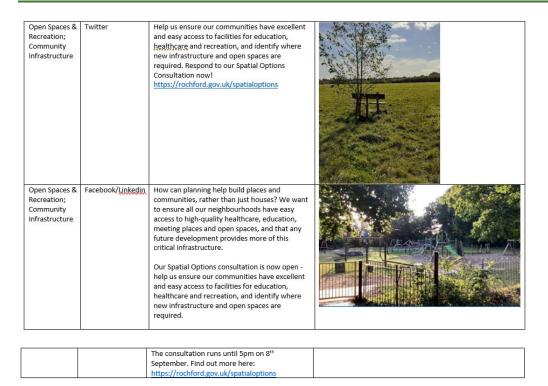
Transport & Connectivity;	Twitter	How should the Council plan proactively for better transport infrastructure over the next 20 years, to reduce congestion and encourage walking, cycling and public transport? Have your say in our Spatial Options consultation now: https://www.rochford.gov.uk/spatialoptions	
Transport & Connectivity;	Facebook/LinkedIn	Where do we need to invest in critical transport infrastructure to reduce pressures of development on local road networks, how do we ensure new housing is designed to minimise traffic, and how can we encourage better public transport provision and walking/cycling networks to provide citizens with more choice? Rochford District's Spatial Options Consultation is now open and we are consulting on the best options to plan for sustainable development over the next 20 years and beyond that provides the critical infrastructure to make it easier for everyone to get around. The consultation runs until 5pm on 8th September. Find out more here: https://rochford.gov.uk/spatialoptions	

Employment & Jobs; Town Centres & Retail	Twitter	We're consulting on setting the right planning policies to help businesses invest, expand and create local, skilled jobs, and ensure our high streets and town centres can thrive again after challenging times. Local biz & residents, we need your feedback! https://rochford.gov.uk/spatialoptions	
Employment & Jobs; Town Centres & Retail	Facebook/LinkedIn	Rochford District's Spatial Options Consultation is now open and we're consulting on setting the right planning policies to ensure businesses can find the right workspace to grow and create local, skilled jobs. We also want to ensure our high streets and town centres can thrive again after challenging times by setting the right strategic policies so that they can be both flexible enough to accommodate the latest trends, whilst retaining their key roles as hubs for the whole community. We need feedback from local residents and businesses to help us. The consultation runs until 5pm on 8th September. Find out more here: https://rochford.gov.uk/spatialoptions	

Green Belt & Rural; Heritage	Twitter	Much of Rochford District is rural and historic in character, and over 60% of the District is Green Belt. How can future planning balance our development needs with the importance of preserving our heritage and tranquillity? Respond to our consultation: https://rochford.gov.uk/spatialoptions	
Green Belt & Rural; Heritage	Facebook/ <u>Linkedin</u>	Much of Rochford District is rural and historic in character, and over 60% of the District is Green Belt. How can future planning balance our development needs with the importance of preserving our heritage and tranquillity? Our Spatial Options consultation is now open — provide your feedback and help us shape the future whilst preserving what we have.	
		The consultation runs until 5pm on 8 th September. Find out more here: https://rochford.gov.uk/spatialoptions	

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A series of posts on different social media platforms focused on general information relating to the consultation, raising awareness of the various thematic issues presented in the Document, and details of specific public information events.

Twitter





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5 shares

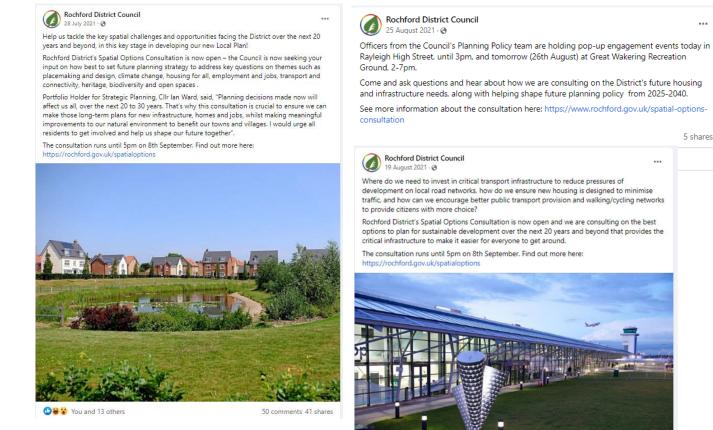
2 shares

Share





Facebook



0 1

Like

Comment Comment

Instagram

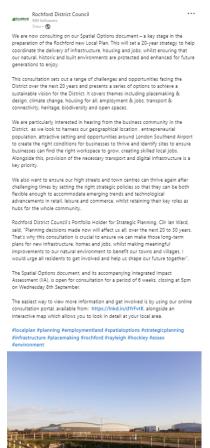


LinkedIn

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The LinkedIn social network is aimed at the business community and used for networking by professionals. A post seeking to engage with local businesses and gather their feedback in relevant fields, such as the economy, town centres and infrastructure, was made in August 2021.



Public Information Events

The following images show examples of public "drop by" information events held during the course of the consultation period.





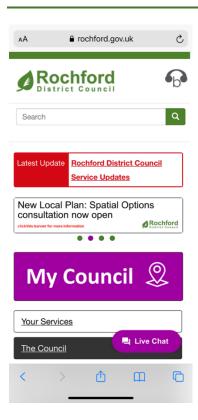






Website

A banner was placed at the top of the Council's website promoting the consultation to all visitors.



Physical Posters

Physical posters such as that shown below were displayed in noticeboards and libraries across the District.



Publicity Postcard

A publicity postcard was mailed to every Council tax-registered address in Rochford District at the beginning of the consultation.

Front



Reverse



Appendix 3: Duty to Co-operate Response Summary

- 1. Formal written representations were invited from statutory consultees, neighbouring local authorities, local Town and Parish Councils and other prescribed bodies such as Natural England and the Environment Agency.
- 2. A summary of each formal response received is set out in Table A1 below.
- Where a formal response was not received from a prescribed body, the Council will
 continue to engage with these bodies to ensure they have an opportunity to shape the
 emerging strategy of the plan at the earliest opportunity.

Table A1: Formal Written Representations (Statutory Consultees and Specific Stakeholders)

Organisation	Summary of Comments
NHS Mid & South Essex Health & Care Partnership (HCP) / Castle Point & Rochford	Vision – Q2-Q3. Support ambitions which promote the health and wellbeing of residents, including provision of a network of infrastructure including healthcare/social facilities, improving access to green infrastructure, open spaces, and the coastline, and enabling residents to work locally, supporting health and wellbeing of residents.
Clinical Commissioning Group (CCG)	Strategic Objectives – Q4. Support priorities meeting need for homes and jobs; to provide for retail, leisure, and commercial development; infrastructure; and climate change mitigation/adaptation. Suggested amendments on following strategic objectives to support this:

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Strategic Objective 2: Supported as access to quality housing one of the wider determinants of health. Suggested reference to Lifetime Homes standard to ensure homes provide accessible and adaptable accommodation for everyone. Approach would reduce need for home adaptations for older people. Also highlighted challenges for younger people in entering the housing market and suggested consideration of ability of health and social care workers to access housing market when addressing affordability. A local health and care workforce is needed to successfully deliver services.

<u>Strategic Objective 3:</u> Supported as economic wellbeing is a wider determinant of health.

<u>Strategic Objective 4:</u> As well as allocating land for employment, provision should be made to enable working from home, reducing need for travel. Should be reflected in house design,

<u>Strategic Objective 7:</u> Scope could be extended beyond town centres meeting local shopping/leisure needs to include broader range of activities supporting health and wellbeing, e.g., shared workspaces, community cafes and drop-in facilities for early intervention health services.

<u>Strategic Objective 8:</u> Include improvement of village/neighbourhood centres to enable delivery of some health services, e.g., vaccinations and drop-in facilities.

<u>Strategic Objective 11:</u> Supported as encouraging walking and cycling increases levels of physical activity, whilst good quality public transport provision is important for linking new and established developments to healthcare services and providing equal access.

<u>Strategic Objective 14:</u> Welcome the inclusion of this and look forward to working with Council to ensure access to good quality social, health and wellbeing services.

<u>Strategic Objective 15:</u> Welcomed inclusion of reference to older people, however felt it should be made clear that promoting healthy and active lifestyles, and improving physical and mental health and wellbeing, is important for all ages, including young people.

<u>Strategic Objective 23:</u> Supported mitigation and adaptation, but suggested amendment to make it clear that climate change is ongoing as well as forecast, and immediate action required.

Growth Scenarios: For Figure 16, stressed that these figures are only typical, and in different circumstances both fewer and more than 3,5000 dwellings might be required to trigger provision of a new primary healthcare centre.

Spatial Strategy Options – Q6. Each SSO will require additional healthcare capacity to provide primary care services to meet needs of

new residents. Means for achieving this will be determined by scale and location of development and further discussion is needed. New facilities may not always be most appropriate option as increased capacity can be secured through reconfiguration/extension of existing premises. Accordingly, suggested rewording from the Spatial Strategy Options potentially delivering 'new medical facilities' to 'additional medical facility capacity' to reflect this. Further information on scale and location of developments in options presented would be required to form a preference. HCP would welcome further involvement in the LP to ensure healthcare needs properly addressed.

Spatial Themes – Q9. Agree with sequential approach, HCP doesn't support healthcare premises in areas of flood risk. Q10. Support safeguarding of Coastal Protection Belt and Upper Roach Valley as resources for residents' physical and mental health. Q11. Support principle of requiring developments to source energy from low carbon/renewable sources, whilst ensuring aspects such as landscape not compromised in process. Q12. Support highest energy efficiency standards in developments – new NHS buildings designed to standards higher than building regulations to achieve Net Zero.

Place-making and Design – Q.14-16. Place-making charter in the LP supported, to secure high-quality buildings and built environments; green and blue spaces; active travel; provision for local/community food production; and accessible and adaptable homes. Important to ensure existing communities and new developments (including Gypsy & Traveller communities) are integrated with easy active travel options and public transport, to ensure development has positive impacts on health and wellbeing of all residents.

Community Infrastructure - Requested references to Castle Point & Rochford CCG are removed, as separate CCGs are coming together in integrated care system with other health and social care partners. Suggested replacement of text on 'Healthcare Facilities' with wording reflecting how an integrated approach across a wide range of health and social care facilities would meet existing and future needs. This included increasing capacity in hospitals, investing in GP practices, establishing healthcare hubs hosting a range of diagnostic and early intervention services, a move to digital services and refurbishment, extension and sharing of facilities, along with new builds.

Rayleigh Town Council

Technical Evidence – Q1. Further evidence inclusive of Infrastructure Delivery and Funding Plan; Level 2 Strategic Flood Risk Assessment, Local Cycling and Walking Infrastructure Plan; evaluation of impact of current development in Rayleigh; and own housing need assessment is required.

Vision – Q2.-Q3. Agree, but more emphasis required for housing and commercial need.

Strategy Options - Q5. Agree with settlement hierarchy. Q6.-Q7.A new town / garden village would enable infrastructure and sustainable

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development. Small scale housing and windfall development should be included in delivery.

Spatial Themes – Q8. Cultural and Accessibility should be included. Q9-Q10. Agree with sequential approach to flood risk with a protection Plan. Q11.-Q12. Agree with development sourcing energy from renewable sources and that new development should achieve higher energy efficiency standards than set out in building regulations. Q.13. Low carbon and renewable energy should include solar for new development as standard, and incentives for existing development to adapt. Tidal energy should be explored. Q14 -Q15. Placemaking charters should be bespoke and agreed principles adhered to. Q16. Agree with design codes/guides/masterplan should be created alongside the new local plan, but need to be bespoke, inclusive of character and heritage of settlements.

Housing Need – Q17. Planning for housing need should include planners, developers, charities, and communities. Q18.-Q19. Smaller freehold housing is needed to enable affordability and downsizing. Existing bungalows need development protection and should be included in new development mix. New development should comprise of accessible 'lifetime homes'. The ageing population needs consideration. Q20.-Q22. Gypsy and Traveller needs require a permanent site, and stronger controls preventing unauthorised development.

Employment & Jobs – Q23. Retain commercial land with emphasis on business expansion needs. Engagement with education establishments, Job Centre, businesses, and developers is needed for skills development. Q24. Current employment site allocations are inadequate to meet needs through to 2040. Q25. Spatial Strategy Option 3 could deliver new employment opportunities. Q26. Rochford District lacks woodland conservation / management business accommodation, and HGV training premises. Q27. Other measures needed to ensure economic growth include better road networks, improved digital connectivity, apprenticeships / training, and CCTV.

Biodiversity – Q29. Agree that the plan should designate and protect areas of land of locally important wildlife value. Conformity and improved existing policies are required. Doggetts Pond can be improved, has wildlife value. New wildlife sites should be created on large new developments. New meadows should be planned for, and smaller sites enhanced. All grass areas and verges need protection. Q30. Agree that the plan should designate and protect areas of locally important geological value. Q31. Biodiversity Net Gain should be delivered on-site.

Green & Blue Infrastructure – Q32. Quality green and blue infrastructure requires connectivity, accessibility, and inclusivity. Public facilities are required to enhance some existing sites. Q33. The Central Woodlands Arc and Island Wetlands are a step in the right direction but must be regularly monitored to ensure connectivity is provided to any

new parks or habitats that are created in future. The map needs to be clearer as does not show exact routes. Large open space to South West of Rayleigh could be enhanced. Existing sites must be retained. Q34. Enhancing existing areas, and new sites created on new development should be implemented.

Community Infrastructure - Q35. Needs to be assessed before plans approved to ensure adequate planning and funding. Q36. A new settlement would ensure infrastructure is provided. Q37. Roads, schools, medical services, accessible play spaces, waste collection, verge maintenance are issues in Rayleigh. A further waste recycling site or improved waste collection service is required.

Open Spaces & Recreation – Q38. Improvements to existing space and free sports facilities are required. Q39. All-weather facilities should be considered. Q40. The listed potential hub sites look suitable but will need funding. Q41. New developments would deliver improvements to open space. Q42. Open spaces will be specific in each parish and need protection.

Heritage – Q43. Issues should be addressed through revised planning policies and relevant body consultation. Q44. Conservation status should be considered for woodland. Q45. There are many sites of historic importance which should be protected and included on the Local List.

Town Centres & Retail - Q46. Protection from housing development is required for town centre uses to ensure vibrancy. Engagement with building owners is required to assist with re-letting of empty shops. Incentives are needed for new/start-up businesses. Frequent review of the plan is required. Good public transport is crucial. Q47. Agree with local centre hierarchy. Q48. Agree with existing town centre boundaries and extent of primary and secondary shopping frontages. Q49. We should continue to restrict appropriate uses within town centres. A mix of retailers is essential to maintain viability. Q50. Large scale development would enable a retail precinct. Some sites may be suitable for a retail/leisure outlet creating employment and tourism.

Transport & Connectivity – Q51. 'Infrastructure first' is required to address transport and connectivity needs through the plan. Q52. More work required on A127, The Carpenters Arms roundabout, Fairglen interchange/Rayleigh Weir, access to Hockley, and a joined up cycleway network is required. Q53. Spatial Strategy Option 3b is the preferred strategy option, creating opportunities for improvements. A complete review of sustainable transport is required.

Green Belt & Rural Issues – Q54. A rural exception site may be an option for a retirement village. Q55. Improved sustainable public transport is required to meet needs of rural communities.

Planning for Complete Communities

Rayleigh Q56. The Draft Vision Statement ignores over-development, lack of existing infrastructure. Commercial development should be supported in town centres, secondary shopping facilities and on approved industrial estates. Community Improvement Districts should be established. Community infrastructure should be protected and extended. Active travel to town centres and secondary shopping should be improved. Large scale development in Rayleigh should be resisted. Conservation areas and green belt and sites subject to exclusion criteria on the call for sites require protection. Only an infrastructure plan would provide evidence of sustainability in the long term. All green spaces hold significance due to community value.

Rochford & Ashingdon - Q57.Hockley Woods requires protecting.

Hockley Q58. Agree with draft vision insofar it relates to Rayleigh. Hockley Woods and thoroughfares must be protected from development, either adjacent to or close by. All green spaces hold significance for community value.

Hullbridge Q60. Agree with draft vision insofar as it relates to Rayleigh. River area needs protecting due to flood risk. All green spaces hold significance for community value.

Rawreth Q63. Agree with draft vision insofar as it relates to Rayleigh. Protection needs to be given to development that change the dynamics of the village and those areas bordering Wickford. Farmland needs protection. Urban sprawl must be prevented.

Rural Communities Q66. Agree that rural communities do not require individual vision statements at this time, but for future consideration for protection. Communities should decide their vision statement. Q67. Agree with draft vision for rural communities. Q68. The Council should listen to residents to see where they would like to go next. Empower Parish and Town Councils to take relevant local actions.

Hawkwell Parish Council

Technical Evidence – Q1. An infrastructure assessment inclusive of a highway study / traffic assessment, air quality, and existing recent development impacts, education and doctors surgery data / reports, and drainage capacity / flood risk assessment evidence is required. A housing windfall delivery report to establish how many completed over the last Local Plan that could not be included in the government's housing target is also required.

Vision – Q2. Do not agree with the draft vision. The Parish should not be split, i.e., West Hawkwell joined with Hockley and East Hawkwell with Rochford in the Document. Q3. Agree with a range of separate visions due to unique needs and characteristics but requires community engagement. Q4. Strategic Priority 2 fails to address the ageing population, e.g., omission of social housing for exception sites.

Strategy Options - Q5. Do not agree with settlement hierarchy. Do not agree with the splitting of Hawkwell parish into West and East. Q6.

Spatial Strategy Option 3a is the preferred Option. It is the least disruptive, and a new village to the West of Rayleigh enables good transport links, attracting S106 funding for infrastructure. **Option 3b** would impact on existing roads and erode the green belt separation between the Rochford District and Southend. **Option 3c** would require a Southend bypass and encourage development. An alternative option is for a combination of **Option 1** and **Option 3a** after brownfield sites utilised and planned infrastructure completed.

Spatial Themes – Q8. Changing character of the District needs emphasis. Q9. Agree that flood risk and coastal change be considered in the Plan with a focus on limiting flooding. Q10. The Coastal Protection Belt needs extending beyond 2025 to protect from development and flooding. Other areas should be considered. Q11. Agree that new development implementing renewable energy but not impacting on sensitive areas. There is not enough free land to support wind or solar farms. Q12. New development should achieve high energy efficiency standards but cost must not be passed to the house buyer. Q13. A decentralised grid would support local generation of lowcarbon and renewable energy with sub power stations on Foulness Island mitigating community impacts. Q14. Detailed placemaking charters should be settlement-specific. Q15. The principles set out are the right ones, providing settlements are consulted. Q16. New design guides, codes or masterplans should be created focusing on individual settlements alongside an overarching District guide.

Housing – Q17-19. All types of housing should be provided on new developments within **Option 3a**. Bungalows should be protected from conversion, for the ageing population. Development should focus on accessible smaller properties catering for younger households / first time buyers and social/affordable housing. Q20-22. A development controlled permanent traveller site is needed, away from sensitive green belt and residential areas, but in proximity to schools and main roads.

Employment & Jobs – Q23. Engagement is required with educational partners to ensure employment and skills needs are planned for. Commercial / business areas need to be protected from flooding. Q24. Green belt sites must be controlled by regularisation. Brownfield sites requires protection from housing development. Employment within local communities will reduce transport use. Q25. Spatial Strategy Option 3a provides new opportunities within infrastructure delivery. Q26. Green industries are required. Q27. Improved road networks, cycle networks, footpaths and public transport are required for economic growth. Further/higher education and training facilities should also be considered. Q28. Airport growth needs careful consideration due to existing transport network (which needs improvement), noise and pollution. Airport-linked transport should be included in the strategy, and new Area Action Plan or masterplan should be considered.

Biodiversity – Q29 -30. Agree with designation / protection of locally important wildlife and geological areas. Other sites are worthy of

protection for future generations. Q31. Net gains for biodiversity are best delivered on-site.

Green & Blue Infrastructure – Q32. Best delivered by retaining existing green and blue infrastructure, ensuring connectivity. Q33. Lobbying central government for revision of RDC plans to support quality green and blue infrastructure should be considered.

Community Infrastructure – Q35. An assessment is required to ensure adequate planning and funding is secured before development. Q36. S106 monies should be allocated to the development areas in the Plan. Q37. Ashingdon Road has severe congestion. Improved public transport links would allow easy travel within the District. Healthcare in Hawkwell is severely restricted. A new waste recycling site is required.

Open Spaces & Recreation – Q38. Improved bus links are required and using S106 monies for improvements. All sites should be maintained and protected. Q39. All-weather facilities should be considered where appropriate. Q40. The listed potential hub sites seem acceptable. Q41. Spatial Strategy Option 3a would enable delivery of new open space and sports provision. Q42. All reserve green spaces, woodlands and the reservoir must be protected.

Heritage – Q43. Protection from inappropriate development is required, with heritage sites listed involving local consultation. Q44. Precious woodland requires protection. Q45. An updated Local List is required to enable consideration of heritage protection.

Town Centres & Retail – Q46. Security and good transport links will ensure vibrancy. Q47. Business with free parking needs encouraging and reduced business rates considered. Q49. A selection/balance of retailers is essential to enable viability, with consideration to chain stores. Q50. **Option 3a** – will allow opportunity to expand retail.

Transport & Connectivity – Q51-53. 'Infrastructure first' is required with an Infrastructure Delivery Plan / review to deliver transport and connectivity improvements working with relevant partners. A Southend bypass would destroy a large green belt area and should be opposed. An active travel bypass scheme would mitigate road congestion.

Green Belt & Rural Issues – Q54. Green belt, agricultural sites and rural and village life require protection. Q55. Developments of 10 units or below should contribute financially to infrastructure improvements.

Planning For Complete Communities

Rochford & Ashingdon – Q57. Development impacts are not mentioned. **Spatial Strategy Option 3a** would alleviate pressure on Hockley, Hawkwell, Ashingdon and Rochford.

Hockley & Hawkwell – Q58. There should be separate visions as they are very different in character. Infrastructure improvements are

	required before considering any further development. Green belt sites are inappropriate for development and require protection for biodiversity and farming, only brownfield sites should be considered. Evidence is required. Local green spaces hold local and national significance in mitigating climate change.
Hockley Parish Council	Consultation Process – The volume of information in the consultation was difficult to access. RDC are not reaching residents who have no internet.
	Spatial Themes – Cultural and Accessibility were not included.
	Vibrant Town Centres – Active engagement is required with premises owners in re-letting of empty shops with incentives.
	Employment – Lack of environmental services, e.g., woodland conservation. Engagement with education providers, businesses and Job Centre is required to establish employment needs. Employment site allocation on Figure 30 will not meet needs through to 2040. Future needs must be assessed.
	Improve Long-term Economic Growth – improved road networks and digital connectivity is required. Protect existing commercial land.
	Planned Forms of Housing – Starter homes, specialist / suitable homes for an ageing population, and emergency housing are needed. A mix of affordable housing with recreational space is required. Homes should be lifetime homes. Social housing quotas should be included in all new development. Community engagement is needed. Empty buildings and brownfield sites should be considered / converted first. Development will impact the environment e.g., farming for food production. Integrity of settlement boundaries should be considered. Unauthorised development should be better managed.
	Local Generation of Low-Carbon & Renewable Energy – New development should source energy from renewable sources, and incentives offered to existing development.
	Infrastructure / Community Infrastructure — An Infrastructure Delivery & Funding Plan, Road Traffic Survey, Level 2 Strategic Flood Risk Assessment and Local Cycling & Walking Infrastructure Plan are required. Development impacts on existing infrastructure is a concern for residents and local employment, impacting community sustainability. There is concern for integrity of S106 agreements. Improved public transports links are required. 'Infrastructure first' is required. Protection and expansion of existing community infrastructure is required.
	Open Spaces – All green spaces and designated areas hold local significance and must be protection for recreational value and climate

	change mitigation. Hockley lacks a sports field. A new settlement is supported to accommodate the government's housing targets.
	Local Wildlife Sites Review – Policies need to be updated. New sites are required for biodiversity and connectivity. Other open space sites need to be included in the Plan e.g., Plumberow Mount Open Space.
	Heritage – Protection is required for other sites not within conservation areas for historic and community value.
	Promoted Sites (Hockley) – Development would impact quality of life, openness of the green belt and environment (access to footpaths, threat to wildlife, woodland, and flood risk).
Paglesham	Housing – The need for suitable areas for housing is understood.
Parish Council	Promoted Sites – CFS090, 122, and 166 are opposed due to protected designated areas, flood risks, and access to services.
Canewdon Parish Council	There is concern for any new development in the local area around Canewdon due to unacceptable impacts on infrastructure and designated areas. Canewdon should retain its village identity. Development must be proportionate. New development is preferred on smaller sites throughout the District. Promoted sites outside the village envelope are inappropriate as not sustainable. There are other sites also considered inappropriate due to purposes of green belt and impacts on village character. CFS062 is preferred but requires a reduction in scale and should be phased.
Stambridge Parish council	Housing – The need for suitable areas for housing is understood. Promoted Sites – CFS072, 073, 111, 112, 113, 114, 116, 124, 141, 014/BFR3 are opposed due to protected designated areas, flood risk and access to services. CFS104/BFR3 is supported for housing development.
Sutton Parish Council	Housing – The need for suitable areas for housing is understood. Promoted Sites – CFS076, 123, 155, 165 are opposed due to protected designated areas, flood risk and access to services.
Anglian Water	Wastewater – Southend and Rayleigh West theoretically have capacity to take 2,500 dwellings. Rochford will be at its limit, unlikely to be at a point stopping some additional growth. When Southend reaches capacity, Anglian Water will need to relocate WRC (water recycling centre) as there isn't any more space on the land or around it. On paper preference would be development served by Rayleigh West.
	Pre-Development Services Response - Along with Rochford, the other WR (water recycling) catchments likely to be involved are

Rayleigh-West and Rayleigh-East (*see attached map following this table).

All three WRC's can accommodate the sought numbers (circa 2.5k units). The pinch points are in the network and so would need considering when at preferred site shortlisting stage. Additional housing sites should first be located in the Rayleigh-West catchment (as wastewater colleagues indicated) and then Rayleigh-East. The preference would be for concentration of development enabling investment at scale by Anglian Water and developers. The network will need looking at closer and may pose some issue with

The network will need looking at closer and may pose some issue with regard to the impact on frequency and volume from the Combined Sewer Overflows.

This would be at the ROCD SP and STBG SM (*see attached map following this table).

Both discharge to sensitive watercourses and may involve new storm discharge consents from EA which may cause some concerns for developers although with this, should be resolvable at planning application stage.

RDC will need to consider existing commitments mainly in Rochford (the Rochford catchment).

Castle Point Borough Council

Unmet Development Needs

CPBC's new LP has been submitted for public examination in October 2020, and in process of being examined. CP Local Plan states that it is not possible for CP to meet own development needs without incursion into the GB. CPBC is not able to assist RDC in meeting its development needs to 2040 in non-GB locations.

Spatial Options

[It is noted that] RDC are exploring spatial options for meeting additional need within the extent of the GB.

RDC will be aware that CPBC are considering growth in the North West Thundersley area in a review of its local plan, which sits to the south of the A127, and the south of the sites being considered for development to the West of Rayleigh.

Delivery of any development in the North-West Thundersley area will depend on access from the Fairglen Interchange.

CPBC has been in early discussion with ECC as the Highway Authority to being this location forward alongside long-term proposals for the Fairglen Interchange.

If RDC are similarly considering the potential to concentrate growth near the Fairglen Interchange, then there is scope for the authorities to work collaboratively to open up development opportunities around this junction. Recommended that Basildon Council also be part of that

discussion as their boundary also abuts and incorporates elements of the Fairglen junction.

Sustainable Travel

It is noted that the majority of Rochford residents work outside the district, and many live in smaller settlements where services are limited. There is a need to improve public transport provision alongside the growth in the LP. CPBC has similarly come to this conclusion, and will need to see service improvements as set out in Infrastructure Delivery Plan

Regarding the A129, ECC is developing a route improvement strategy from Hadleigh to Rayleigh Weir with emphasis with promoting more sustainable modes of travel. Journeys continue from CP into Rayleigh and vice versa. There is a need for CPBC and RDC to work together with ECC to ensure the route improvement strategy extends into Rayleigh Town Centre and to Rayleigh Station.

Duty to Cooperate

There are potential cross-boundary issues to be addressed through the preparation of the RDC LP in relation to: a) any development proposed to the west of Rayleigh, and b) sustainable travel on the A129.

CPBC welcomes RDC use of South Essex evidence base to inform the Spatial Options consultation and approach proposed to some matters, which helps to improve consistency of planning between the different boroughs in South Essex. This includes the South Essex Regional Park identified through the South Essex Green and Blue Infrastructure Strategy, which will aid in the delivery of Green and Blue Infrastructure across the wider South Essex area.

CPBC is willing to continue working with RDC and all SE partners as appropriate.

Chelmsford City Council

CCC notes the need for 360 homes per annum, and that the standard methodology of using a 50% buffer would require 10,800 new homes by 2040 for RDC.

CCC is clear that RDC should meet own local housing need in full.

RDC should seek to meet employment and retail needs in full.

CCC expects RDC to meet Gypsy & Traveller, and Travelling Showpeople accommodation (pitches) in full.

CCC recognises through DTC with other Essex authorities that there is a requirement to review the need for transit sites and notes that the

Gypsy and Traveller Transit Site Assessment is now under preparation across Essex.

Strategy Options – CCC would only support an option which accommodates all of Rochford's growth needs in full for homes, employment and infrastructure with an appropriate buffer, whilst protecting and enhancing the natural and built environment.

CCC recognises adjoining districts' own growth needs, and the relationship with Chelmsford for employment and other facilities (such as hospitals and retail).

Significant growth is proposed in South Woodham Ferrers (CCC's own LP) in proximity to Rochford District. Growth in Rochford District should not have adverse impacts on planned growth in SWF by placing additional pressure on existing and proposed facilities, including education.

CCC concurs with the spatial themes presented in the spatial options document.

CCC will continue to work with RDC on cross-boundary issues and engage with LP preparation.

SCI – CCC considers the SCI as being clear and comprehensive.

Integrated Impact Assessment – it is noted that the IIA fulfills the requirement and duties for the Sustainability Appraisal, Strategic Environment Assessment, Equalities Impact Assessment and Health Impact Assessment.

Southend Borough Council (SBC)

SBC and RDC should continue to co-operate on cross-boundary issues, including through the Rochford and Southend Member Working Group and via the Association of South Essex Local Authorities (ASELA).

Coordination of Plans Coordination of RDC and SBC local plans is crucial to the effective and sustainable planning for this part of South-East Essex.

An 'infrastructure first' approach is required due to issues with infrastructure capacity, e.g., transport, identifying improvements and achievability through a coordinated approach (sub-regional and cross-boundary).

Spatial Options Q.1 - Given the number of important strategic cross-boundary issues already recognised between the two authorities (e.g., housing needs and transport infrastructure), strongly advocated that both authorities continue to work together on the preparation of evidence studies and technical work to support plan making.

Draft Strategic Priorities and Objectives Inclusion of reference to a new Country Park facility north-east of Southend should be considered and included as part of Strategic Objective 15, complementing similar facilities at Hadleigh Castle and Cherry Orchard, and provide a needed addition to informal recreation opportunities for south-east Essex.

It is recommended that the words 'including a new Country Park facility to the north-east of Southend' are inserted after the word 'coastline', to read as follows: 'To protect and enhance leisure, sport, recreation and community facilities and to support the delivery of a multi-functional green infrastructure network across our district and along the coastline including a new Country Park facility to the north-east of Southend, connecting to neighbouring areas in South Essex and beyond, to promote healthy and active lifestyles, and improve physical and mental health and well-being into old age'.

Growth Scenarios RDC should continue to explore the options to accommodate a level of housing development which is higher than necessary to meet its own housing needs (as calculated by Government's Standard Methodology), so it is able to consider and possibly address at least some unmet housing need in Southend, in line with Government policy.

Spatial Strategy Options Q6. Spatial Strategy **Option 4** (Balanced Combination) should be taken forward as it offers the most appropriate strategic approach providing sustainable communities and new infrastructure and seeks to make best use of existing brownfield sites, allowing a continuous supply of development land over the plan period.

SBC welcome **Option 3a**: concentrated growth west of Rayleigh (well served by the strategic highway network (A130 and A127)) and **Option 3b**: concentrated growth north of Southend (dependent on a coordinated and planned approach for a new highway and sustainable transport link) to achieve infrastructure improvements.

The consultation document omits to note that **Option 3c** (concentrated growth to the east of Rochford), would be strongly dependent on new highway provision to the east of Rochford, the existing Ashingdon Road being of inadequate capacity to cope with the increase in transport movements.

Figure 23 (Sustainability Appraisal of Strategy Options (AECOM, 2021)) identifying Options 3a, 3b, 3c and 4 as providing a positive return in terms of transport and movement is misleading.

Option 3b requires effective cooperation to explore development opportunities to the north of Southend, if considered further, informing both Councils' next stage of plan making.

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Appendix A

Growth in this location would meet some of Southend's unmet housing need. Significant new infrastructure would be required, delivering advantages to neighbouring communities.

This scale of development has greater potential to deliver development finance.

SBC would not support development to the east of Rochford or south of River Roach without significant mitigation and transport improvements within Rochford District and Southend Borough. Further improvements to the A127 to improve capacity at pinch points are required to facilitate growth, but constrained by its urban context. Strategic transport opportunities (new link road/sustainable transport corridor north of Southend, and new transport hub at Southend Airport Railway Station) and funding need to be jointly explored with ECC.

Option 2 (Urban Extensions) is unlikely to deliver the required transport improvements to accommodate growth on the network within this area.

Spatial Themes Q8. Key spatial themes of Transport and Connectivity requires greater emphasis due to having a wider impact relating to a range of transport modes and is cross-boundary and sub-regional in its impact.

Climate Change and Resilient Environments Q9,11 & 12. Support sequential approach to flood risk, developments to source percentage of energy from low carbon and renewable sources and higher energy efficiency standards.

Q10. Agree that Coastal Protection Belt and Upper Roach Valley should be protected from development.

Place Making and Design Q16a. Agree that new design guides, codes and masterplans be created alongside the new local plan.

Q16b. More appropriate to have these for individual growth areas (Options 3a and 3b) – effectively planned in a sustainable manner.

Employment and Jobs Q25. Land north of Temple Farm Industrial Estate provides the opportunity for an extension of the estate to meet future employment needs as part of Spatial Strategy Option 3b: concentrated growth north of Southend.

Future of London Southend Airport Q28. SBC welcome continued cooperation with RDC to ensure an effective policy framework, and consider environmental impacts of growth.

Green and Blue Infrastructure Q33 & 34. Option 3b: concentrated growth north of Southend offers opportunities for new accessible green space including a new sub-regional Country Park aligning with the River Roach, incorporating land within flood zone 2.

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Appendix A

Community Infrastructure Q36. Option 3b: concentrated growth north of Southend offers opportunities for new/improved community infrastructure – new school, leisure and health facilities.

Transport and Connectivity Q51. The local plan needs to recognise that significant volumes of traffic that will have their origin or destination in Rochford District will utilise highways within Southend Borough, particularly the A127. A partnership approach to infrastructure is essential.

The RDC Local Plan should seek to ensure that approval of large development proposals (inclusive of individual sites) is subject to infrastructure triggers and held until infrastructure is committed. Cumulative impacts of development have significant impacts on existing highways beyond Rochford District.

Q52. A comprehensive integrated partnership approach to improving connections is required across the whole sub-region.

Q53. Spatial Strategy Option 3b – offers potential for improved transport connectivity. A new link road from east Southend to A127 via Warners Bridge, as well as new transport hub at Southend Airport train Station.

Potential for a Rochford bypass to the east of the town if Option 3c taken forward – opportunity to deliver an outer strategic highway route linking A130 between Rayleigh and Hullbridge.

Planning for Complete Communities

Ravleigh

Q56b. Option3a – growth west of Rayleigh offers potential to meet a variety of housing needs, mixed use developments and community infrastructure.

Rochford & Ashingdon

Q57e. Edwards Hall Park (local green space) holds local significance – provides pedestrian / equestrian gateway into Cherry Orchard Jubilee Country Park.

Q57d. Any future development scheme should be planned to avoid the coalescence of Rochford with Southend.

Wakerings and Barling

Q59b. Option 3b – offers potential for improved community infrastructure, transport and access improvements, and provision of public open green space.

Q59d. Direct coalescence of Great Wakering / Little Wakering with Southend should be prevented.

Stonebridge and Sutton

Q64b. Option 3b offers potential to provide for improved community infrastructure, transport and access improvements, and public open green space.

Other Minor Comments

Page 65 last paragraph, the third sentence is incomplete.

Page 98 Figure 32: Map of Key Green and Blue Infrastructure Assets includes land within the Southend Borough south of Great and Little Wakering. This should be deleted from the map.

Page 135 Figure 45: Map of Rochford and Ashingdon should read Figure 44: Map of Rayleigh. In addition, the blue horizontal lines defined on the map are not interpreted in the key.

Basildon Borough Council

Accommodating Rochford's Development Needs

Basildon is unable to meet own Objectively Assessed (housing) Need as set out in own LP submission to PI (March 2019). Further work to overcome this is ongoing.

Therefore, BBC is unable to assist RDC with unmet housing need.

BBC will continue with joint working through ASELA.

Spatial Options Document 2021

Duty to Cooperate - No general concerns with DTC approach. BBC will continue to engage through ASELA (South Essex Plan) & other related projects

Overall Approach - No general concerns with Draft Vision & Strategic Priorities

Spatial Strategy Options

BBC recognise that Rochford District is constrained, and that urban & non-GB land is unlikely to be sufficient to meet development needs.

BBC objects to any development to the Spatial Strategy Option 3a – West of Rayleigh due to the potential impacts on access and connectivity to the Wickford urban area. The Basildon Borough Revised Publication Local Plan (2014 – 2034) identifies the area to the south of Wickford as a broad location for potential housing growth. The broad location covers the area of land between Wickford to the north

Appendix A

	and the A127 to the south, and adjacent to the land west of Rayleigh. Potential constraints identified – sustainable access to local services, highway access and ensuring that proposed A127 improvements can be delivered. BBC recognises future development opportunity for this area if constraints can be addressed, and therefore reconsider these locations for future housing growth in the next LP review. Any future cross-boundary opportunity for this area will need to be progressed alongside BBC work to bring forward own proposals for south Wickford broad location. Until then BBC will not support additional development of land west of Rayleigh as will undermine BBC's spatial strategy within its submitted LP due to implications of soundness and delivery. Any future decisions on the Rochford new LP spatial strategy and preferred
	sites may need to occur as part of the process of preparing the South Essex Plan.
Thurrock Council	Q1. Support continued collaboration in preparation of proposed/commissioned technical work by ASELA in support of local plans and the South Essex Strategic Framework.
	Q4. Agree with strategic priorities and objectives.
	Q6. Support Spatial Strategy Option 4 – to meet the Standard Methodology housing number which includes a buffer to drive economic growth and/or address unmet need from elsewhere. Recommend that RDC and SBC consider cross-boundary development.
	Q20. Non-exclusive Options 3,4 and 5 would provide the most flexible approach in meeting Gypsy and Traveller accommodation needs.
	Q63d. RDC should collaborate with neighbouring local authorities through ASELA to assess scale and impact of development options.
	Q65b. RDC and SBC need to collaborate on any cross-boundary development to inform next stages of plan preparation.
Essex County Council	ECC is committed to working with RDC through regular and on-going focused collaborative discussions to prepare evidence that ensures the preferred spatial strategy, policies and site allocations are sound, viable and deliverable, where future development is aligned to the provision of required local and strategic infrastructure.
	ECC will use its best endeavours to assist on strategic and cross-boundary matters under the DTC.
	ECC support RDC preparing a new LP.

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Appendix A

It is too early to provide detailed comments on the impacts, opportunities and requirements for the full range of ECC infrastructure and services, and additional evidence is required on a range of matters to inform the selection of preferred strategy and sites, together with supporting policies.

The preferred strategy and site allocations will need to ensure that the requirements of ECC infrastructure and services are met to secure their sound, viable and sustainable delivery at the right scale, location and time, commensurate with housing needs and growth aspirations.

This is inclusive of, but not limited to;

Transportation modelling.

Scenario testing for education provision including early years, childcare, and Special Education Needs with Disabilities provision.

Minerals and Waste assessments;

Flood and water management assessments.

Economic need and employment evidence.

Skills – Adult Social Care, Public Health, climate change, and green and blue infrastructure.

Health Impact Assessment advice and assistance.

RDC will need to engage and work closely with ECC to inform site selection.

Spatial Growth Scenarios – the preferred scenario will need to meet national policy to deliver housing and other growth requirements; climate change resilience and adaptation; and RDC environmental aspirations. The standard methodology should be met. Any buffer to drive local economic growth or address unmet need from elsewhere is supported but will need to be based on sound evidence.

Spatial Strategy Options – the option to proportionately spread growth across the District (SSO 2b) would not deliver the necessary scale of growth to secure the viable and sustainable delivery of local or strategic infrastructure and services (most notably a secondary school) and would not be supported. A preferable option is to see a combination of the options presented resulting in urban intensification, a focus on main towns, and concentrated growth in one or more locations, informed by evidence base and further site assessments.

ECC will need to be involved in any cross-boundary development proposals. Option 3a (West of Rayleigh) would need to be delivered in the longer term given current constraints of the strategic road network (Fairglen Interchange) and have regard to emerging proposals from

Basildon and Castle Point Boroughs; and Option 3b (North of
Southend) will require formal working with Southend Borough Council.

ECC's comments and observations made in response to the Issues and Options consultation 2017/18 continue to apply.

Environment Agency

Water Resources

Q1. There needs to be consideration of the South Essex Joint Strategic Plan and the water cycle study. This can highlight where there may be restrictions on development.

Q4. Strategic Priority 3 mentions providing 'sufficient provision of infrastructure'. There needs to be consideration for wastewater/foul water in a strategic objective. Strategic Objective 9 could be amended to cover this: 'To ensure that all new homes and commercial premises are supported by appropriate, timely and necessary infrastructure to mitigate potential impact, including those relating to transport, utilities, telecommunications (including broadband), open spaces and greenways, flood risk, wastewater treatment capacity, education, health and other community facilities. This is required to ensure development is phased in line with treatment capacity to protect the water environment. If sufficient capacity is not available this can affect the locations of development. Strategic Objective 20 mentions protecting the 'natural environment'. This could be strengthened by the addition of rivers and other freshwaters'. This is because the Water Framework Directive (WFD) requires protection of all waters; rivers, lakes, and coastal/estuarine waters.

Spatial Strategy Options - The options include possible development at several towns. These are served by Water Recycling Centres, the main ones being Rochford, Rayleigh East, Rayleigh West. All have some capacity at the moment for development but we recommend early discussions with AWS and use of a water cycle study to ensure that developments are located and phased with wastewater treatment capacity.

Page 37 of the Document talks about protecting a natural environment and about protected areas. But all water environments are protected under the requirements of the WFD. Assessment of large developments need to consider the main requirements of this directive – that there will not be a deterioration in the water environment and that required improvements in quality are not compromised. The river Roach and its tributaries are within the Rochford area, and tributaries of the River Crouch.

Flood Risk -

Q2. It would be good to see something in here regarding flood risk, it could fit under the Environment heading and state: 'We will aim to

manage flood risk and look to sequentially site development out of the flood zone to try to reduce flood risk both now and with the effects of climate change'.

Q9. Agreed with sequentially siting development out of flood zones. This in itself is the best way that they can best protect their communities from flood risk. Also pointed out that since the previous consultation (Issues & Options), climate change allowances have been updated, the latest guidance can be found at:

https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances

Ecology

Agreed with the vision and proposals for biodiversity and blue / green infrastructure included in the plan. The following link could be added as a resource regarding green infrastructure http://www.biogeomorph.org/greengrey/

Natural England

Integrated Impact Assessment (IIA) - Health and Wellbeing

Natural England recommends the adjustment of the Appraisal Question 'Enhance multifunctional green infrastructure networks throughout the plan area,' by adding a reference to neighbouring authority areas. The amended wording would be: 'Enhance multifunctional green infrastructure networks throughout the plan area and neighbouring authority areas.' This adjustment is considered advisable as green infrastructure networks may involve land that extends beyond the District boundary and restricting the provision to the District boundary could exclude the scope for landscape scale provision. This could be important given the location of some of the growth options now being considered.

There is no longer an appraisal question which will consider whether an option promotes the use of sustainable transport modes such as walking and cycling. Whilst a similar appraisal question features in the "Climate Change" theme, it would still be a relevant consideration in assessing the extent to which a proposal meets the Health and Wellbeing IIA Objective. The Essex Green Infrastructure Strategy 2020 could provide a relevant addition to the evidence base for this aspect of the emerging Local Plan.

Integrated Impact Assessment -Landscape

Natural England supports the inclusion of an appraisal question that considers the relationship and potential impact of any option/proposal on existing areas of tranquillity.

Integrated Impact Assessment – Climate Change

Natural England recommends an appraisal question which will ensure that options are considered in terms of their compatibility with the Essex and Suffolk Shoreline Management Plan which is specifically referenced in the Spatial Options document. The following wording is suggested for the appraisal question: "Support the priorities identified in the Essex and Suffolk Shoreline Management Plan."

Integrated Impact Assessment – Biodiversity

Paragraph 179 of the NPPF (Habitats and Biodiversity) is directly relevant to this particular theme and should be referenced and adjustments are recommended to the appraisal questions to better reflect the NPPF policy advice in that paragraph.

Natural England would advise that specific reference is made to nationally or locally protected sites. In addition, in light of the updated NPPF text, there will be an increased emphasis on the delivery of biodiversity net gain. The following wording is suggested for the first appraisal question: "Avoid, or if not possible, minimise impacts on biodiversity, nationally or locally protected sites, and pursue opportunities for securing net gains for biodiversity."

Sport England

Q4. Support Strategic Objectives 9,11,15 and 17 – opportunities for sport and encourage active and healthier lifestyles, according with government policy and Sport England's 'Uniting the Movement Strategy'.

Q14. A place-making charter would inform relevant policies providing weight given to charter in practice in decision making. Principles of charter need to be embedded in local policies.

Q15. Support given for place making charter principles set out.

Q16a. Essex Design Guide sets out design principles and if applied in Rochford District it would not be necessary to prepare a separate design guidance.

Q32. Quality green and blue infrastructure network – Non-Exclusive Option 3 is particularly supported but needs a robust strategy. Integration of the South Essex Estuary Park proposals by ASELA will need to be considered.

Q35. Delivery of community infrastructure, particularly sports facility infrastructure will be a combination of protection and enhancement of existing or new facilities, either standalone or in co-located/integrated facilities, e.g., combined GP surgeries and leisure centres.

Q38. Delivery of open space, sport and recreation needs is likely to involve a combination of options. The Council's Playing Pitch Strategy

and Built Facilities Strategy should be used as a starting point, supplemented by specific advice from Sport England.

Q39. Support in principle the potential 3G pitch locations as derived from a feasibility study. Other identified alternatives should be considered if not explored within the feasibility study. Investment into 3G pitches in adjoining local authorities, suitably located should be considered.

Q40. If hub sites and key centres derived from the Council's Playing Pitch Strategy and Built Facilities Strategy, then they are considered robust. Investment sites for 3G should be considered as potential hub sites.

Q41. All strategy options offer potential to deliver open space or sport facility improvements. Smaller developments can offer financial contributions towards off-site strategic priorities and larger developments can offer on-site provision – new playing fields, open spaces (country parks), shared use of new school facilities, and accessibility improvements.

If any promoted sites are current or former sports facilities and the Council is minded to consider allocating them in the Preferred options, it is advocated the Sport England is engaged.

Historic England

Potential Site Allocations

Commend the commissioned high level heritage assessment of the Call for Sites submissions which will ensure that heritage is considered consistently across all sites and heritage assets.

Recommend Advice Note 3 'The Historic Environment and Site Allocations in Local Plans' approach to assessing sites and their impacts-

The Council's existing heritage assessment only deals partly with this approach, and does not comprise a full heritage impact assessment of each of the sites (which the heritage assessments acknowledge).

Suggest that Heritage Impact Assessments undertaken for sites considered to be contenders, and for which heritage issues identified using Advice Note 3.

Mitigation required to make a site acceptable from a historic site perspective may pose a site as unviable (mostly smaller sites).

Site specific policy criteria informed by further heritage assessment

The NPPF and Planning Practice Guidance set out how policies should provide clear indications for decision makers in their reactions to development proposals. Local Plans should set out a positive strategy

	with regard to conservation of the historic environment. Heritage Impact Assessments should inform site-specific policies.
	Would also expect to see reference in the policy and supporting text to the need to conserve and seek opportunities to enhance the significance of on-site or nearby heritage assets (noting that significance can be harmed by development within the setting of an asset), the need for high quality design and any other factors relevant to the historic environment and the site in question.
East of England	Spatial Strategy Options
Ambulance Service	Option 1 - Urban Intensification – supported. Where possible ambulance services would be incorporated into existing ambulance Hubs / response posts or provision of additional or relocated services. New health/medical centres would provide opportunity to explore an ambulance response post. Potential requirement for developer contributions. Limited opportunities to deliver new infrastructure.
	Option 2 - Urban Extensions – As above. Rural growth combined with good public transport is supported. A combination of small developments would require developer contributions to enable new response posts to maintain response times.
	Option 3 - Concentrated Growth – As above. Support growth opportunities. We need to be aware of and involved in transformational infrastructure projects. Opportunities to improve health and well-being are supported.
	Option 4 - Balanced Combination – As above.
Essex Police	Draft Vision – Q2. Should also include focus on promoting and designing a safer community.
	Strategic priorities & Objectives – Q4. Secure by Design (SBD) principles should be adopted to enable safe and secure environments.
	Spatial Themes – Q8.Sustainable communities must be safe, secure and accessible. This can be evidenced within the Health Impact Assessment.
	Climate Change and Resilient Environments – Q12. SBD standard enables substantial carbon cost savings.
	Design guides, codes & Masterplans – Q16. Consultation should be sought from Essex Police to embed designing out crime concepts from the initial stages. A consistent approach should be garnered. Crime

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Appendix A

should be considered as a material consideration. All design specifications should correlate to the Security Needs Assessment.

Gypsy and Traveller Sites – Consideration needs to be given to road infrastructure and site access in allocations, and the 'Communities and Local Government, Designing Gypsy and Traveller Sites, Good Practice Guide'. Liaison with the Designing out Crime Team should be sought.

Heritage – Q43. Consideration must be had for good natural surveillance and paasage of the public in development design process to protect heritage assets.

Transport & Connectivity – Consideration should be given to design of public realm avoiding central points for ASB. 'Safe system approach' should be adopted in design of roads, access and links across proposed development.

Appendix 4: Correspondence with adjoining authorities on accommodating Development Needs

- The consultation document identified that the quantity of deliverable land within the
 District was unlikely to be sufficient to meet the District's long term development
 needs. The document identified that if these needs were to be met in full, there would
 almost certainly need to be an amount of development within the Metropolitan Green
 Belt.
- 2. In light of this, a letter was sent to all adjoining local authorities in order to understand the likely capacity of land within their area to meet some or all of Rochford District's development needs.
- 3. This process is without prejudice to any decision around the future strategy of the Rochford new Local Plan, but nevertheless helps to ensure any decisions around that strategy are based on a realistic and up-to-date understand of land availability and suitability across the local area.

Letter sent to adjoining authorities

- 4. The following letter was sent to the following adjoining authorities
 - Castle Point Borough Council
 - Chelmsford City Council
 - Basildon Borough Council
 - Maldon District Council
 - Southend-on-Sea Borough Council
- 5. The detail of the above was also explained in an officer meeting with Thurrock Council; however no formal letter was sent given the lack of a shared boundary.

Obverse



Assistant Director – Place & Environment Marcus Hotten





Date: 9 August 2021

Dear

Capacity for Accommodating Development Needs - Rochford new Local Plan

As you will be aware, Rochford District Council (the Council) has recently published the latest stage in our new Local Plan, the Spatial Options document, for consultation. As part of the preparation of its new Local Plan, the Council is considering options for how its identified development needs could be accommodated over the next 20 years.

At this stage, the Council has identified four broad strategy options for accommodating these needs.

- Option 1: Urban Intensification
- Option 2: Urban Extensions
- Option 3: Concentrating Growth
- Option 4: Balanced Combination

The Local Housing Need methodology calculates a need of 360 homes per annum for Rochford District. Over the period of the new Local Plan, it is therefore likely that in the region of 7,200 homes will need to be planned for to accommodate Rochford's needs.

As identified in our current and emerging evidence base, we estimate that at least 4,000 homes can be accommodated on existing sites, including current allocations, planning permissions and other opportunity sites, and expected windfall. Through our Urban Capacity Study and wider work, we have identified that it may be possible to accommodate around 1,500 more homes through increasing density and repurposing allocations, however we have less certainty over the sustainability or deliverability of these options.

At this time, our evidence suggests employment land needs may be met by existing allocations, however this will be kept under review.

Reverse

At this stage of plan-making, the Council has not concluded whether exceptional circumstances exist to justify Green Belt release. Nevertheless, of the four strategy options identified, only those which would involve Green Belt release (Options 2-4) would be able to accommodate all of Rochford's identified needs within its own area.

As set out in national policy, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, local planning authorities must, inter alia, explore whether neighbouring authorities could accommodate some of the identified need for development.

As an authority sharing a land boundary with Rochford, and to inform an assessment of whether such exceptional circumstances do exist, I would be grateful if you could advise me of whether any of Rochford's identified development needs could be accommodated in your authority area, either now or in future.

Yours sincerely



Daniel Goodman
Team Leader – Strategic Planning
Rochford District Council

Responses Received

- 6. The table overleaf provides the responses received by adjoining authorities to this letter. Please note, in some cases the authority did not provide a standalone response to the letter but instead addressed the pertinent points in their wider consultation response.
- 7. These responses will need to be taken into account as the Council identifies its preferred strategy to be taken forward in the new Local Plan.

Authority	Response
Castle Point Borough Council	I will address your letter of the 6th August first. As you will be aware, Castle Point Borough Council submitted its draft Local Plan to the Secretary of State for examination in public on the 2nd October 2020. That submitted plan, to accommodate the needs for development arising in Castle Point, includes several allocations within the current extent of the Green Belt. The submitted Castle Point Local Plan is in the process of being examined, and hearing sessions into its soundness and legal compliance took place in May and June 2021. The Castle Point Local Plan states that it is not possible for Castle Point to meet its own development needs without incursion into the Green Belt. The supply identified across the urban area in Castle Point is sufficient to provide 3,148 homes which amounts to around 53.4% only of the borough's own development requirement. To this end, Castle Point Borough Council is not able to assist Rochford District Council in meeting its development needs to 2040 in non-Green Belt locations.
Chelmsford City Council	I am writing in response to your letter dated the 9th August querying whether any of Rochford's identified development needs could be accommodated in the administrative area of Chelmsford, now or in the future. Chelmsford adopted its Local Plan in May 2020, with a housing requirement of 18,515 net new homes in the plan period, at an average annual rate of 805 net new homes per year. This was to meet the full objectively assessed housing need in the period 2013-2036. Chelmsford's local plan provides a supply buffer of close to 20% to try and ensure that the Council's ability to meet the objectively assessed need was not compromised. Therefore, housing sites were allocated with a total provision for 21,843 new homes. The buffer also serves to protect the integrity of the spatial strategy set out in the Local Plan by providing flexibility in the Council's five-year land supply and reducing the possibility of the Council incurring any penalties or sanctions as a result of under delivery and failure to meet the Housing Delivery Test. In Chelmsford City Council's response to Rochford's Spatial Options Document 2021, the City Council have set out that it would only support an option which accommodates all of Rochford's growth needs in full for homes, employment, and infrastructure, ideally with an appropriate buffer for delivery flexibility and within its own boundaries, to ensure that the same potential benefits are realised by Rochford Council. Chelmsford City Council will start consulting on a review of the Local Plan in 2022. We will also be required to meet its housing need calculated using the local housing need methodology, which as of April 2021, is a minimum of 918 dwellings per annum. This represents a 14% increase on the objectively assessed housing need and significantly reduces our supply buffer. Chelmsford's local housing need figure has ranged from 918 to 980 since the publication of the methodology, and at the upper end, represents a 22% increase on the objectively assessed housing need figure.

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Basildon Borough Council

Thank you for your letter dated 6 August 2021, setting out the current position regarding the Rochford New Local Plan, and in particular requesting that Basildon Borough Council give consideration to assisting Rochford in meeting some of the identified development needs within Rochford District.

Basildon Borough Council has an Objectively Assessed Need (OAN) of between 19,491 and 19,771 homes up to 2034. This represents a sizeable uplift in the scale of housing need across the borough. Basildon Council has now submitted the Basildon Borough Revised Publication Local Plan (2014 – 2034) to the Secretary of State for Examination in Public in March 2019. At the time of submission. Basildon Council was unable to meet its housing needs when balanced against other development and environmental considerations. The Planning Inspector examining the Basildon Borough Local Plan is however now seeking clarification on why the plan does not seek to meet the full OAN for Basildon Borough, and further work to deal with this shortfall in housing provision against OAN remains ongoing. We therefore regret that at this time, Basildon Borough Council is unable to assist Rochford District Council in meeting its unmet housing needs. Nonetheless, Basildon Borough Council considers that it remains in the best interests of both Basildon and Rochford Councils to continue with the strong and effective joint working relationships formed under the Association of South Essex Local Authorities (ASELA) in order to bring forward the South Essex Plan. Under the Duty to Cooperate, the South Essex authorities are working together to address a number of strategic, cross boundary issues. We would therefore advise that Rochford District Council continues to work closely with its neighbours to help to address any potential unmet need across South Essex through joint partnership working.

Maldon District Council

Thank you for your letter dated 9 August 2021 concerning the "Capacity for Accommodating Development Needs – Rochford New Local Plan". Maldon District Council's Strategy and Resources Committee carefully considered your request at its meeting on 16 September 2021 and approved the following response.

Committee Response

Maldon District Council recognises the challenge faced by Rochford District Council, as an adjoining local planning authority, in accommodating its development needs over the next 20 years; particularly housing growth given its Metropolitan Green Belt constraints. It is acknowledged that the Rochford District is at an early stage of preparing the Rochford New Local Plan and that work remains underway on its evidence base and policy development and that a decision on which Spatial Option is preferred by the Council is yet to be made.

Maldon District Council understands the National Planning Policy Framework (NPPF) gives Green Belts policy protection and strictly controls the review of Green Belts. It understands that Rochford District

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Council has a few steps to consider before it can conclude whether 'exceptional circumstances' exist to justify the review of its Green Belt boundaries and the subsequent release of Green Belt land for development purposes. It is accepted that the letter dated 9 August 2021 is part of the necessary engagement with neighbouring authorities to determine whether some of the Rochford District identified need could be accommodated in anywhere outside the Rochford District and therefore reduce the pressure on the Metropolitan Green Belt protected by the NPPF.

Whilst none of Maldon District's land is within the policy constraint of Metropolitan Green Belt, the Committee feels it must point out that the District is nevertheless subject to international, European, national, and local environmental designations which seek to protect its coastline and areas of countryside due to their value to science, biodiversity and flood risk, which are also valued locally for their additional contributions to recreation, landscapes and health. These are matters, which are also being considered as part of the Maldon District Local Development Plan Review 2021-2023, particularly in respects of how they could affect Maldon District Council's own ability to accommodate development needs. It also notes that the common boundary between the two Districts is a marine boundary, with no physical crossing points.

The Committee has considered the Maldon District Council's legal obligations under the Duty to Co-operate and accepts that housing can be a strategic, cross boundary matter between local planning authorities.

Having considered the Maldon District Local Housing Needs Assessment published in July 2021, which reviewed the appropriateness of the functional Housing Market Area for Maldon District, the Committee is concerned that there is not a particularly strong relationship between Rochford District and Maldon District. It is concerned that were there to be any growth needs transferred between the two Districts in the future, it would serve a quantitative purpose only and not support the delivery of qualitative housing needs in Rochford District where the needs have originated. The Committee also understands there is already an agreed mechanism in place across all Essex authorities, via the Essex Planning Officers' Association (EPOA), for considering how unmet housing needs should be dealt with, where they arise. In addition, the Committee has noted that plans are already underway by the Association of South Essex Local Authorities (ASELA) to prepare a South Essex Joint Strategic Plan to consider, amongst other things, how unmet needs could be distributed across the housing market area.

To conclude, the Committee have concluded that at this present time, given the very early stage Maldon District Council is at with its own LDP Review, it cannot categorically confirm whether it is able, or not, to assist Rochford District Council in accommodating its housing needs.

However, given the boundary between the two District's is a body of water, with no shared crossing points and recent housing market area analysis does not demonstrate a strong inter-dependant relationship between the two Districts, it is recommended that Rochford District Council exhaust and evidence to Maldon District Council that the EPOA Mechanism on Unmet Housing Need be fully complied with, prior to Maldon District Council being able to make any further comment, or any agreement with Rochford District Council on this matter under the Duty to Co-Operate.

The Committee trusts that this response is helpful to Rochford District Council and suggests that further engagement with officers and members takes place, as necessary, in line with the Maldon District Duty to Co-Operate Strategy 2021.

Southend-on-Sea Borough Council

The Borough Council broadly welcomes the publication of the Consultation Paper and its general approach to setting out the potential options for meeting Rochford District's future development needs, whilst delivering sustainable development and protecting the local environment. Given Southend Borough's acute challenge in finding sufficient land within the Borough to meet its own development needs, it also particularly welcomes the recognition of the importance of liaising with neighbouring local authorities to ensure wider cross-boundary issues and development needs are fully addressed.

The 'Southend New Local Plan - Refining the Options' consultation document (2021) sets out that Southend is unable to meet all identified housing needs, as calculated using the Government's Standard Methodology, up to 2040. Even if Southend's remaining Green Belt was developed there would be a calculated shortfall of around 4,000 new homes. This rises to around 9,000 new homes if Green Belt land within Southend Borough is not developed.

It is therefore appropriate that Rochford District Council should continue to explore the options within its area to accommodate a level of housing development which is higher than necessary to meet its own housing needs (as calculated by Government's Standard Methodology), so it is able to consider the potential, and possibly address at least some of the unmet housing need evident from plan preparation to date in Southend, in line with the requirements of Government policy.