

# New Local Plan

## Issues and Options Feedback Report 2018





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## Glossary of Abbreviations

Abbreviation	Meaning
<b>ASELA</b>	Association of South Essex Local Authorities
<b>BaBC</b>	Basildon Borough Council
<b>BrBC</b>	Brentwood Borough Council
<b>CPBC</b>	Castle Point Borough Council
<b>DPD</b>	Development Plan Document
<b>ECC</b>	Essex County Council
<b>ESFA</b>	Education and Skills Funding Agency
<b>HMA</b>	Housing Market Area
<b>I&amp;O</b>	Issues and Options
<b>JSP</b>	Joint Strategic Plan
<b>LDF</b>	Local Development Framework
<b>LDP</b>	Local Development Plan
<b>MDC</b>	Maldon District Council
<b>MMO</b>	Marine Management Organisation
<b>MoU</b>	Memorandum of Understanding
<b>NPPF</b>	National Planning Policy Framework
<b>OAN / OAHN</b>	Objectively Assessed Need / Objectively Assessed Housing Need

## Rochford District Council New Local Plan – Issues and Options Document Feedback Report

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<b>PPG</b>	Planning Practice Guidance
<b>RDC</b>	Rochford District Council
<b>SA</b>	Sustainability Appraisal
<b>SBC</b>	Southend-on-Sea Borough Council
<b>SHELAA</b>	Strategic Housing and Employment Land Availability Assessment
<b>SHMA</b>	Strategic Housing Market Assessment
<b>SPD</b>	Supplementary Planning Document
<b>TBC</b>	Thurrock Borough Council

## 1 Introduction and Context

### Rochford District Local Plan

- 1.1 This Feedback Report has been prepared to summarise and conclude upon the *Issues and Options* consultation that formed the first formal stage of public engagement in the preparation of Rochford District Council's new Local Plan for the District.
- 1.2 The *Issues and Options* Document (and accompanying Sustainability Appraisal) set out the key challenges and opportunities that were identified in relation to the future evolution, prosperity and vitality of the District to 2037. This included identifying and considering challenges and opportunities relating to housing, infrastructure, jobs and the environment.
- 1.3 As the first stage of the Council's new Local Plan, the *Issues and Options* Document is broad and open in its scope; as the Council progresses with its new Local Plan, developing its evidence base and undertaking further public and stakeholder consultation, the new Local Plan will become more refined as the Council's preferred strategy and policies emerge. The Council's latest Local Development Scheme (LDS), adopted in July 2018, sets out a proposed timetable for the preparation of key planning documents, including the estimated adoption of the new Local Plan in Summer 2021.
- 1.4 The *Issues and Options* consultation was undertaken in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, hereafter the Local Planning Regulations 2012. It ran for twelve weeks between 13 December 2017 and 7 March 2018. The consultation period was substantially longer than the minimum required under the Local Planning regulations – six weeks – to account for the Christmas and New Year period.

### South Essex Joint Strategic Plan

- 1.5 In January 2018, the Council signed a Memorandum of Understanding (MoU) with the five other South Essex local authorities (Basildon, Brentwood, Castle Point, Southend-on-Sea and Thurrock) and Essex County Council, which supports the preparation of a Joint Strategic Plan (JSP) for South Essex. This JSP will sit alongside, and complement, the new Local Plan, considering strategic cross-boundary issues such as the spatial distribution (location and number) of new homes and jobs, identifying areas of opportunity and setting industrial, infrastructural and transport priorities across South Essex. The collaborative work supporting the JSP is still in its infancy and the JSP will be subject to extensive public consultation as it develops, beginning in 2019. The Council's latest LDS sets out a proposed timetable for the preparation of the JSP and is available on the Council's website.

## 2 Purpose and Scope

- 2.1 Regulation 22 of the Local Planning Regulations 2012 requires any Local Plan submitted to the Secretary of State to be accompanied by a statement setting out:
- which bodies and persons the local planning authority invited to make representations under Regulation 18,
  - how those bodies and persons were invited to make representations under Regulation 18, and
  - a summary of the main issues raised by the representations made pursuant to Regulation 18.
- 2.2 The purpose of this Feedback Report is therefore to summarise and conclude upon the consultation process, as well as to consider and provide an initial response to the main issues and comments raised by respondents.
- 2.3 Representations were received from a wide range of different stakeholders in the District, including residents, local businesses, community groups, developers, landowners (and their agents), neighbouring local authorities and Parish/Town Councils, as well as other statutory bodies.
- 2.4 Due to similar, and in some cases identical, representations being made by respondents, this Feedback Report will not identify or provide an initial response to every representation individually. The Feedback Report is organised into chapters based on the category of respondent. Furthermore, given that the Council is at an early stage in its plan-making, it has not always been possible to provide a definitive response to the issues raised. As a result, the majority of key issues have been noted and will be considered in more detail as the Council progresses with its plan-making. Where the issue raised is one of support for, or objection against, a proposed course of action, it has also generally not been possible to provide a definitive response at this stage given the need to fully consider new and emerging evidence and undertake further consultation.
- 2.5 All representations can be read in full using the Council's consultation portal, available at [www.rochford.gov.uk/iao](http://www.rochford.gov.uk/iao)



### 3 Summary of Consultation Process

#### How was the consultation managed?

- 3.1 In order to ensure that all interested parties were given the opportunity to understand and respond to the consultation, the Council undertook a comprehensive programme of consultation and engagement relating to the *Issues and Options* Document. This consultation followed, and in many cases exceeded, the Council's own standards for public engagement as set out in its adopted *Statement of Community Involvement* 2016.
- 3.2 The consultation centred upon the *Issues and Options* Document, however this was accompanied by a draft Sustainability Appraisal, which set out in more detail the key potential environmental, economic and social sustainability implications of the identified policy options.
- 3.3 An executive summary document was also produced to provide an overall non-technical summary of the consultation document and outline how interested parties could have their say.
- 3.4 Respondents were able to view all consultation material on the Council's online consultation portal, and were able to submit representations in a number of ways; these being:
- Through the online consultation portal at [www.rochford.gov.uk/iao](http://www.rochford.gov.uk/iao);
  - By email to [issuesandoptions@rochford.gov.uk](mailto:issuesandoptions@rochford.gov.uk); or
  - By post to Council Offices, South Street, Rochford, Essex, SS4 1BW.
- 3.5 Reference copies of the consultation material were also placed in several public locations, where residents were able to inspect documents and find paper copies of representation forms. These locations were:
- Council reception areas in Rochford (Council Offices) and Rayleigh (Civic Suite); and
  - Public libraries in Rochford, Rayleigh, Hullbridge, Hockley and Great Wakering.
- 3.6 Reference copies of these documents were also provided to every Parish/Town Council who were asked to make these available to residents upon reasonable request.
- 3.7 At its discretion and upon reasonable request, the Council did also provide individual copies to those who could not reasonably access the consultation material through the standard means, such as because of a disability.

#### How was the consultation publicised?

- 3.8 A promotional leaflet was sent to approximately 35,000 households in the District which publicised the consultation opportunity including how recipients were able to formally respond. 5,421 subscribers to the Council's planning mailing list were also

notified of the consultation opportunity by email, and these subscribers also received 'reminder' emails during the course of the consultation window. Analytics from the Council's email service suggest that these emails were read by an average of 3,114 individuals. The Council's planning mailing list consists of various local residents, businesses, developers and agents who have expressed an interest in receiving planning-related updates from the Council.

- 3.9 Promotional posters were also produced to promote the consultation opportunity and were displayed in District, Parish and Town Council noticeboards across the District. Posters were also distributed for display at local leisure centres, doctors' surgeries and private gyms. Smaller 'business cards' were also produced; these were distributed at local events including the Council-run 'business breakfast', business networking events and public drop-in sessions (see Paragraph 3.15).
- 3.10 A prominent banner was placed on the front page of the Council's website directing visitors to webpages explaining the consultation process and outlining opportunities for readers to have their say. This included a newly-launched Frequently Asked Questions (FAQs) page covering how the Council is planning for the future of the District. These webpages were also promoted through hyperlinked logos in Council email signatures, direct email bulletins to subscribers to the Council's planning mailing list, and other direct communications with members of the public. Furthermore, digital 'banners' were displayed on television screens located in Council reception areas, alerting visitors to the consultation opportunity and how they could get more information.
- 3.11 The Council used its official social media accounts on Twitter and Facebook to promote the consultation opportunity consistently throughout the consultation window, including using 'promoted posts' to ensure its posts were prominently displayed during the consultation. These posts directed the reader to the relevant pages on the Council's website where they could access the consultation material and find out more information. Analytics information from Facebook shows that the Council's 27 posts reached an average of 1,065 individuals and were interacted with by an average of 59 individuals. For the purposes of these analytics, the phrase 'interacted with' refers to the act of clicking onto the post, commenting on or 'liking' the post or clicking the web-link included within the post. Analytics information is not available from Twitter; however the Council's official Twitter profile has 4,342 'followers' as of May 2018.
- 3.12 The page on the Council's website set up for the *Issues and Options* consultation received 2,278 unique visitors during the consultation window. Of these visitors, 34.1% originated from social media, 27.3% came directly to the Council's website, 24.0% originated from external websites and the remaining 14.6% originated from search engines. Over the course of the consultation window, 557 visitors to this webpage originated from Facebook, 367 visitors from e-mails/e-bulletins, and 4 visitors from Twitter.
- 3.13 The consultation was covered by local media (the Southend Echo) throughout the three month period, including press releases from the Council to advertise forthcoming

drop-in events. Wording was also provided to local Parish Councils for inclusion in any parish newsletters.

- 3.14 The Council sought to directly engage with identified hard-to-reach communities who are typically underrepresented in the consultation process. This included direct engagement with the District's Gypsy and Traveller communities through letters and face-to-face communication, as well as placing promotional material in school newsletters at Sweyne Park and King Edmund schools. Unfortunately it was not possible to place material within school newsletters at Fitzwimarc or Greensward schools due to conflicting publication cycles.
- 3.15 Copies of all key consultation materials are provided at Appendix A.

### Public Drop-in Sessions

- 3.16 To support the consultation – by providing an opportunity for local residents to inspect the consultation material and directly liaise with Council officers – the Council held multiple public drop-in sessions at key locations in the District. These drop-in sessions were open to any interested party and were held in:
- Rayleigh (WI Hall, Bellingham Lane): Monday 15 January, 3pm – 9pm
  - Hockley (Old Fire Station, Southend Road): Tuesday 16 January, 3pm – 9pm
  - Rochford (Parish Rooms, West Street): Tuesday 6 February, 3pm – 9pm
  - Rayleigh (WI Hall, Bellingham Lane): Monday 19 February, 3pm – 9pm

### Next Steps

- 3.17 Every representation received as part of the *Issues and Options* consultation will be considered in detail and will help to inform the next stage of the Council's new Local Plan, the *Preferred Options* document. The *Preferred Options* document will also need to take into account the Council's evidence base, including new and emerging evidence, as well as guidance from statutory consultees and infrastructure providers. The *Preferred Options* document will also need to reflect the latest national policy, given that a revised National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) were published in July 2018.
- 3.18 The projected timetable for consultation on the *Preferred Options* document is set out in the Council's latest Local Development Scheme (LDS), adopted in July 2018.

## 4 Summary of Consultation Responses

- 4.1 In total, **554** unique responses were received to the *Issues and Options* consultation. A breakdown of the number of responses received by type of respondent is provided below:
- 473 from members of the general public (including residents, local businesses and Councillors acting in a personal capacity);
  - 48 from landowners, developers or planning agents;
  - 7 from Parish and Town Councils;
  - 7 from neighbouring local authorities, including Essex County Council;
  - 10 from government agencies and other public bodies;
  - 6 from interest groups and trusts; and
  - 3 from community associations and local action groups (where they are responding as an organisation on behalf of their members)
- 4.2 A list of those individuals and organisations that comprise each sub-category (except those that are considered members of the general public) is provided at Appendix B.
- 4.3 These figures also include two petitions, one from Rayleigh Action Group which comprised the views of 946 individuals and another from Great Wakering Independent Action Group comprising the views of 226 individuals.
- 4.4 From these 554 unique responses, 2,835 individual representations were made or have been identified. This reflects the fact that most respondents provided comments on multiple issues within the Issues and Options document. Each identifiable issue commented upon has been considered as its own representation to ensure the Council gives due attention to each issue.
- 4.5 Of these 2,835 representations, 361 were made through the Council's online consultation portal (12.7%), 2,129 were made by email (75.1%) and 345 were made in written form, either using the paper response form provided by the Council or as a letter (12.2%).
- 4.6 Those individuals who submitted a response through the Council's online consultation portal were able to 'attach' their representations to the parts of the document that they considered most relevant. However the Council has accepted any representations made through its online portal even where the representation does not exactly relate to the part of the document to which it is attached; this should be born in mind when considering the distribution of representations in the document. For a full appreciation of representations received, individuals are encouraged to read the feedback report in full. In the case of responses made by email or post, Council officers themselves attached each representation to the parts of the document that they considered most relevant, unless a part of the document was specifically referenced in the representation.

- 4.7 The Council could only accept consultation responses as duly made where the response was accompanied by the name of the respondent and, as a minimum, either a postal or e-mail address. Where appropriate, the Council sought to contact such individuals providing an opportunity for this additional information to be submitted. In total, 2 responses were rejected on the basis of anonymity.
- 4.8 The Council is also obliged to reject any consultation responses that are abusive, discriminatory or defamatory in nature, however no responses were rejected on this basis.

Figure 1: Number of Representations per Element

Element		No. of Reps	Element		No. of Reps	Element		No. of Reps
SECTION 1: Introduction	Introduction	26	SECTION 6: Delivering Homes and Jobs	Introduction	30	SECTION 10: Protecting and Enhancing our Environment	Open Space and Outdoor Sports and Recreation	34
	Why do we need a new Local Plan?	4		Need for Market, Affordable and Specialist Homes	111		Indoor Sports and Leisure Centres	6
	What is the Issues and Options Document?	5		Need for Care Homes	21		Facilities for Young People	5
	How have you assessed the sustainability impacts?	10		Delivering our Need for Homes	324		Play Space Facilities	10
	How have you assessed the environmental impacts?	2		Good Mix of Homes	40	Protecting and Enhancing our Environment	29	
	How have you worked with key partners?	4		Gypsy, Travellers and Travelling Showpeople	25	Introduction	5	
	How can local communities get involved?	6		Houseboats and Liveaboards	14	Green Belt	217	
	How will the plan be evidenced?	5		Meeting Business Needs	15	Biodiversity, Geology and Green Infrastructure	116	
SECTION 2: Tell us your Views	Tell Us Your Views	46	SECTION 7: Supporting Commercial Development	Need for Jobs	24	Wallasea Island and the RSPB's Wild Coast Project	13	
	How can I have my say?	8		London Southend Airport	13	Landscape Character	16	
	How are you engaging with residents and businesses?	4		Supporting Tourism and Rural Diversification	14	Protecting and Enhancing Heritage and Culture	17	
	What are the next steps?	1		Supporting Commercial Development	3	Good Design and Building Efficiency	16	
SECTION 3: Our Characteristics	Our Characteristics	6	Retail, Leisure and Town Centres	19	Air Quality	68		
	Introduction	4	Villages and Local Neighbourhood Centres	24	Detailed Policy Considerations	2		

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	Our Economy	7		Delivering Infrastructure	261		Mix of Affordable Homes	10
	Our Environment	13		Introduction	9		Self-Build and Custom-Build Homes	11
	Our Communities	7		Highways Infrastructure	205		Rural Exception Sites	9
SECTION 4: Our Spatial	Our Spatial Challenges	6	SECTION 8: Delivering Infrastructure	Sustainable Travel	84	SECTION 11: Detailed Policy Considerations	Annexes, Outbuildings and Independent Homes	6
	National Picture	12		Communications Infrastructure	12		Basements	6
	South Essex Picture	18		Water and Flood Risk Management	125		Replacement, Rebuild or Extension of Existing Green Belt Homes	8
	Our Vision and Strategic Objectives	5		Renewable Energy Generation	11		Agricultural, Forestry and Other Occupational Homes	9
SECTION 5: Our Vision and Strategic Objectives	Introduction	2		Planning Obligations and Standard Charges	22		Development of Previously Developed Land in the Green Belt	16
	Our Current Vision	2	SECTION 9: Supporting Health, Community and Culture	Supporting Health, Community and Culture	87		Parking Standards and Traffic Management	24
	Our Future Vision	1		Introduction	1	Homes Businesses	14	
	What have you told us so far?	3		Health and Well-being	95	Advertising and Signage	7	
	Drafting Our Vision	12		Community Facilities	22	Light Pollution	9	
	Drafting our Strategic Objectives	25		Education and Skills	90	Contaminated Land	8	
Delivering Homes and Jobs	182			Early Years and Childcare Provision	17	<b>TOTAL</b>	<b>2835</b>	

## 5 Summary of Representations made by Government Agencies / Public Bodies

5.1 The tables below provide a summary of the representations received from government agencies and public bodies, as well as an initial response to the main issues raised.

5.2 The government agencies and public bodies from which representations were received are the following:

- Anglian Water (AW)
- Education and Skills Funding Agency (ESFA)
- Environment Agency (EA)
- Historic England (HE)
- Marine Management Organisation (MMO)
- National Grid
- Natural England (NE)
- NHS Community Health Partnerships
- NHS Property Services
- Sport England (SE)

Element	Main issues raised	Initial response
<p><b>How have you assessed the sustainability impacts?</b></p> <p>(Paras. 1.8 to 1.11)</p>	<ul style="list-style-type: none"> <li>• The Sustainability Appraisal objectives are generally considered appropriate by all parties</li> <li>• Sufficient evidence should be provided through the Habitats Regulations Assessment (HRA) to demonstrate any significant effects associated with new development</li> </ul>	<p>All comments made regarding the draft Sustainability Appraisal have been shared with the consultant preparing the Sustainability Appraisal for their consideration. Where appropriate, such comments will help to inform the preparation of future drafts.</p>



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	<ul style="list-style-type: none"> <li>• Natural England welcomes the commitment to develop an Essex-wide strategy to identifying potential impacts of recreational disturbance resulting from housing delivery.</li> <li>• Natural England advise that local habitat policy is reviewed and aligned with up to date baseline data to ensure maximum positive effect on biodiversity, health and well-being.</li> </ul>	
<p style="text-align: center;"><b>Our Environment</b> (Paras. 3.13 to 3.18)</p>	<ul style="list-style-type: none"> <li>• Support for reference to the District’s rich and varied historic environment</li> <li>• Term ‘Scheduled Monuments’ should be used in place of ‘Scheduled Ancient Monuments’</li> <li>• Key environmental characteristics should acknowledge areas of international and national designated importance</li> </ul>	Comments noted. These points will be considered when preparing future drafts of the new Local Plan.
<p style="text-align: center;"><b>South Essex Picture</b> (Paras. 4.8 to 4.18)</p>	<ul style="list-style-type: none"> <li>• The natural environment should be considered a strategic and cross-boundary matter, and not just a local issue</li> <li>• Work being progressed under the Essex Coast Recreation Avoidance and Mitigation Strategy (RAMS) should be recognised as a cross-boundary matter under the Duty to Co-operate</li> </ul>	The Council continues to work and engage with the other Essex coastal authorities and Natural England as part of the Essex Coast RAMS Project. It is the Council’s intention to adopt a Supplementary Planning Document once complete that will set a tariff on new developments in order to fund and deliver mitigation measures that off-set the impact of recreational activities on environmentally sensitive sites.

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		All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.
<p align="center"><b>Drafting our Vision</b> (Paras. 5.9 to 5.10)</p>	<ul style="list-style-type: none"> <li>• The vision should have sufficient aspirations for the maintenance and enhancement of the historic environment</li> <li>• The vision should include more reference to the need to consider the historic environment</li> <li>• Vision should be amended to read “Rochford District is an environmentally rich and pleasant place with a focus on business and high quality homes supported by accessible and responsive services and facilities, creating healthy and sustainable communities”</li> <li>• Plan should commit to deliver net gains for the natural environment, in order to compensate for residual impacts of development on environmental assets</li> </ul>	Comments noted. These points will be considered when preparing future drafts of the new Local Plan.
<p align="center"><b>Drafting our Strategic Objectives</b> (Para. 5.11)</p>	<ul style="list-style-type: none"> <li>• Support for Strategic Objective 13 but would ask that local plan policies expand on the issue of water recycling infrastructure and emphasises the use of sustainable drainage systems (SuDS) as the preferred method of surface water management</li> <li>• Support for Strategic Priority 5, and Strategic Objective 21</li> </ul>	Comments noted. These points will be considered when preparing future drafts of the new Local Plan.

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	<ul style="list-style-type: none"> <li>• Term ‘healthcare providers’ should be changed to ‘healthcare commissioners and providers’</li> <li>• Objectives should consider the health and well-being principles of the Essex Design Guide</li> </ul>	
<p><b>Need for Market, Affordable and Specialist Homes</b> (Paras. 6.5 to 6.33)</p>	<ul style="list-style-type: none"> <li>• Affordable homes should consider key-worker housing</li> <li>• Level of growth proposed is likely to place substantial additional pressure on social infrastructure. The Local Plan should be positively prepared to meet both its objectively assessed needs and infrastructure requirements</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Need for Care Homes</b> (Paras. 6.33 to 6.36)</p>	<ul style="list-style-type: none"> <li>• Planning for care homes should be in conjunction with the health economy and take account of the additional health needs of the residents</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Delivering our Need for Homes</b> (Paras. 6.37 to 6.48)</p>	<ul style="list-style-type: none"> <li>• Support for Option A, supporting the effective use of brownfield sites, however the local authority should consider possible contamination issues</li> <li>• A preliminary risk assessment identifying all previous uses and contaminants associated with a use should be undertaken when considering the development of potentially contaminated land</li> <li>• Anglian Water would welcome further discussion on housing delivery options and implications on Anglian Water’s existing infrastructure</li> </ul>	<p>In line with national policy, the Council’s existing policies support the effective re-development of brownfield sites. As part of that process, the potential for land contamination and need for remediation are fundamental considerations.</p> <p>The Council will continue to liaise with Anglian Water, as well as other infrastructure providers, to ensure that the new Local Plan is sustainable in the context of water services and sewerage.</p> <p>The need to protect, conserve and enhance the historic environment are a core objective of any</p>

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	<ul style="list-style-type: none"> <li>• Historic environment should be a key consideration when exploring housing growth options</li> <li>• Where less successful neighbourhoods are proposed for redevelopment, opportunities to enhance the historic environment should be outlined as a priority</li> <li>• Allocation of sites for housing should be in the most sustainable locations to which the historic environment is a critical factor. The distinctive qualities of individual settlements should be taken into account when determining where development should take place.</li> <li>• Conservation Area Appraisals should help assess suitability for development.</li> <li>• Historic England cannot rank options for development in terms of preference, and suggest a Historic Impact Assessment (HIA) is undertaken for each proposed broad locations being considered for development, in line with Historic England guidance.</li> </ul>	<p>new Local Plan, in accordance with national policy. To support this objective, the Council will consider the need to update its Conservation Area appraisals and/or undertake Historic Impact Assessments as the new Local Plan develops.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Gypsy, Travellers and Travelling Showpeople</b> (Paras. 6.61 to 6.78)</p>	<ul style="list-style-type: none"> <li>• Pitches should be acknowledged as a highly vulnerable use in flood risk areas. If users of pitches are residents rather than holiday makers, consideration should be given to the fact that they may have no alternative place of residence in the event of flood.</li> </ul>	<p>When planning for Gypsy and Traveller sites, or holiday caravan uses, flood risk is, and will remain, an important consideration in planning decision-making, in line with national policy and guidance.</p>

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<p><b>Houseboats and Liveaboards</b> (Paras. 6.79 to 6.86)</p>	<ul style="list-style-type: none"> <li>• For the purposes of planning, houseboats should be considered a more vulnerable use in flood risk areas</li> <li>• Pollution potential of houseboats should be considered, including the potential for waste water to be discharged from boats into the natural environment</li> <li>• Sensitivity of the environment should be considered when identifying areas that houseboats could be located</li> <li>• Greater clarity sought over the numbers of houseboats and liveaboards currently in Rochford and potential impacts of increased numbers on environmentally sensitive sites</li> <li>• General support for Options B, D and C</li> </ul>	<p>A houseboat policy will be considered as part of the new Local Plan, if justified, and the environmental implications of the siting or extent of any new houseboat developments will be a fundamental consideration in decision-making.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>London Southend Airport</b> (Paras. 6.112 to 6.117)</p>	<ul style="list-style-type: none"> <li>• Habitat Regulations Assessment should consider any potential impacts to air quality resulting from an increase in flights or changes to flight paths</li> <li>• Natural England support option A</li> </ul>	<p>Any Habitat Regulations Assessment (HRA) prepared in support of the new Local Plan will need to consider the impacts of any proposals on air pollution and quality.</p>
<p><b>Supporting Tourism and Rural Diversification</b></p>	<ul style="list-style-type: none"> <li>• This section should recognise that the England Coast Path may provide economic opportunities for tourism and the rural environment</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>

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(Paras. 6.118 to 6.128)		
<p align="center"><b>Highways Infrastructure</b></p> <p align="center">(Paras. 8.3 to 8.20)</p>	<ul style="list-style-type: none"> <li>• Historic England do not advocate any particular options for transport improvements but support the provision of sustainable transport improvements in principle.</li> <li>• Upgrades to transport networks should consider heritage assets and maximise opportunities for their enhancement.</li> <li>• Transport appraisals should address potential impacts on the historic environment.</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p align="center"><b>Communications Infrastructure</b></p> <p align="center">(Paras. 8.38 to 8.44)</p>	<ul style="list-style-type: none"> <li>• Siting and location of telecommunications infrastructure should consider impact on the historic environment and wider landscapes.</li> <li>• The consideration of positioning is important, particularly in conservation areas.</li> <li>• Equipment should be sympathetically designed and camouflaged, as appropriate, in line with the NPPF.</li> <li>• Importance of fast, reliable broadband for health services should be emphasised</li> </ul>	<p>On relevant applications, the Council will continue to consider the impact of new telecommunications infrastructure on heritage assets, in line with national policy. It is noted that some telecommunications infrastructure is ‘permitted development’ however, which limits the Council’s ability to assess wider impacts.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p align="center"><b>Water and Flood Risk Management</b></p>	<ul style="list-style-type: none"> <li>• Plan should recognise the importance of waste water infrastructure and emerging Essex and Suffolk Water Resources Management Plan (WRMP)</li> </ul>	<p>The Council has, and will continue to liaise with both Anglian Water and Essex and Suffolk Water to ensure that the new Local Plan is sustainable in the context of water and sewerage infrastructure.</p>

<p>(Paras. 8.45 to 8.58)</p>	<ul style="list-style-type: none"> <li>• Southend and Rayleigh East Water Recycling Centres are overcapacity with regard to permit, however Rayleigh West and Rochford have considerable capacity remaining. New development should bear this in mind.</li> <li>• Anglian Water reluctant to commit to upgrades until development locations are firmly planned.</li> <li>• New development allocations should ensure they do not impact on the Rivers Crouch and Roach, or their associated tributaries and floodplains.</li> <li>• Development should be located in Flood Zone 1 to ensure sustainability and compliance with the NPPF.</li> <li>• The Sequential and Exceptions tests should be applied as appropriate to avoid development in areas of flood risk wherever possible and maintain the function of these land areas for natural purposes.</li> <li>• A policy that requires applicants to demonstrate capacity in the sewerage network and identifies SuDS as the preferred method of surface water disposal would be supported. Furthermore, the policy should require that a suitable access is safeguarded for the maintenance of existing drainage infrastructure.</li> </ul>	<p>Flood risk issues, including the requirements for the Sequential and Exceptions Test, are currently and will continue to be considered in accordance with national policy and guidance, and in consultation with the relevant flood authorities. The Council’s approach to flood risk policy in its new Local Plan will need to align with national policy and guidance.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
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	<ul style="list-style-type: none"> <li>• If the Council chooses to update its Water Cycle Study, it should involve Anglian Water with respect to the scope of technical work.</li> <li>• Consideration should be given to ascertain if additional capacity is required to meet the needs of development through the plan period.</li> <li>• Para 8.46 should be amended to reflect potential for managed realignment.</li> <li>• The Plan should refer to the Shoreline Management Plan and take forward applicable actions.</li> <li>• The Plan should help facilitate the relocation of valued environmental assets away from areas of risk.</li> </ul>	
<p><b>Planning Obligations and Standard Charges</b> (Paras. 8.67 to 8.75)</p>	<ul style="list-style-type: none"> <li>• Anglian Water seeks charges directly from developers under the provisions of the Water Industry Act 1991; as such they would not make use of planning obligations under planning legislation.</li> <li>• Following wording requested by Anglian Water: “Consideration must be given to the likely timing of infrastructure provision. As such, development may need to be phased either spatially or in time to ensure the provision of infrastructure in a timely manner. Conditions or a planning obligation may be used to secure this phasing.”</li> </ul>	<p>The Council will continue to support the use of planning obligations to fund infrastructure improvements, as required. It is noted that improvements to water and sewerage infrastructure are beyond the scope of planning obligations and are instead collected under the Water Industry Act 1991.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>



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	<ul style="list-style-type: none"> <li>• Contributions requested from developers should be sufficient to deliver the additional school places required to meet growth</li> <li>• The ESFA support RDC’s approach to ensuring developer contributions and would be interested in reviewing any draft CIL charging schedule</li> </ul>	
<p align="center"><b>Supporting Health, Community and Culture</b> (Paras. 9.1 to 9.2)</p>	<ul style="list-style-type: none"> <li>• The ESFA welcomes reference to the importance of developing appropriate social and community infrastructure including education infrastructure to support growth</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p align="center"><b>Health and Well-being</b> (Paras. 9.3 to 9.11)</p>	<ul style="list-style-type: none"> <li>• Above Para 9.11, heading ‘Recruitment and Retention of Health’ should be used</li> <li>• Option C would not be supported by Community Health Partnerships</li> <li>• Community Health Partnerships suggest option B be amended to include reference to ‘ensuring that land is specifically allocated to healthcare where required’</li> <li>• Para 9.5, after ‘50 homes or more’ insert “in one or more phases of development”</li> <li>• Include text in Para 9.5, ‘care homes and independent living schemes should also proposed suitable mitigation measure’</li> </ul>	<p>The Council has, and will continue to work with relevant bodies, including the NHS, to ensure that the new Local Plan is sustainable in the context of health services and facilities. Furthermore, the Council will continue to support the use of planning obligations to fund improvements to such services, as required. This will include the preparation of an Infrastructure Delivery Plan to ensure infrastructural requirements and funding options are fully considered.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>

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	<ul style="list-style-type: none"> <li>• When planning for new developments, the Council should work with NHS commissioners to ensure that adequate healthcare infrastructure is provided</li> <li>• Where extended or relocated health facilities are required to mitigate the impact of new development, health commissioners would require Section 106 / CIL funding towards the capital cost of delivering this.</li> <li>• Sport England would encourage the inclusion of a design policy that encourages developments to be designed to promote active lifestyles, walkable communities and connected footpath/cycle routes in accordance with the Essex Design Guide</li> </ul>	
<p style="text-align: center;"><b>Community Facilities</b> (Paras. 9.12 to 9.15)</p>	<ul style="list-style-type: none"> <li>• Consideration should be given to use of community facilities for home-based businesses</li> <li>• Should not use restrictive policies on community facilities, or include healthcare facilities within such a definition, as this can prevent or delay required investment</li> <li>• The NHS employs its own rigorous testing and approval processes to identify unneeded and unsuitable healthcare facilities</li> <li>• Much surplus NHS property is no longer suitable for modern healthcare without significant investment, where these are no longer required,</li> </ul>	<p>In line with national policy, the Council supports the re-development of brownfield land in sustainable locations and would support the principle of using vacant public sector land to deliver housing, where such land exists and is available. In its latest Strategic Housing and Employment Land Availability Assessment (SHELAA) 2017, the Council sought to identify and assess any potentially available public sector land that could be suitable for future development, however no such land was identified at that time.</p> <p>The Council has, along with other South Essex local authorities and Sport England, jointly commissioned Playing Pitch and Built Facility</p>

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	<p>there should be a presumption in favour of their re-use for housing</p> <ul style="list-style-type: none"> <li>• Sport England seeks to ensure that a planned approach to the provision of facilities and opportunities for sport and recreation is taken by planning authorities and is informed by the evidence base</li> </ul>	<p>Strategies. These Strategies will help to provide an up to date and robust source of evidence on both the quality and quantity of sport and recreation facilities within the District, and their adequacy to meet future needs. These Strategies, once complete, will help to inform the new Local Plan.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p align="center"><b>Education and Skills</b> (Paras. 9.16 to 9.29)</p>	<ul style="list-style-type: none"> <li>• The ESFA suggest that RDC’s existing policies provide a useful starting point, however it may be advantageous to avoid referring to specific sites within the policy to allow flexibility</li> <li>• Would be helpful to expressly refer to relevant national policies</li> <li>• ESFA support principle of LPAs safeguarding land for the provision of new schools and expansion of existing schools</li> <li>• RDC should give regard to the Joint Policy Statement from the Secretaries of State for Communities and Education on ‘Planning for Schools Development’ (2011)</li> <li>• The ESFA encourages close working with local authorities during all stages of plan-making to help</li> </ul>	<p>The Council will liaise with relevant bodies such as the ESFA to ensure that the implications of the new Local Plan on school infrastructure is fully understood and considered. Essex County Council (ECC) is the relevant education authority for the District and the Council will continue to work closely with ECC to ensure proposed policies are sustainable in the context of education services. This will include the preparation of an Infrastructure Delivery Plan to ensure infrastructural requirements and funding options are fully considered.</p> <p>The Council will continue to support the use of planning obligations to fund infrastructure requirements, as required.</p>

	<p>guide development of new school infrastructure and meet predicted demands</p> <ul style="list-style-type: none"> <li>• ESFA draw attention to the approach taken by the London Borough of Ealing in producing a Planning for Schools Development Plan Document (DPD) which provides policy direction and establishes the Council’s approach to providing primary and secondary school places</li> <li>• Emerging plan should identify specific sites to deliver the school places needed to support growth, as documented in an up-to-date Infrastructure Delivery Plan. Site allocations should clarify requirements for the delivery of new schools, including when they should be delivered to support housing growth</li> <li>• Policies should make it clear that developments will be required to contribute to land and construction costs for new schools or expansions</li> <li>• A degree of flexibility about site specific requirements should be retained given the scope for variation over time. Details and requirements could be agreed at application stage as opposed to plan-making stage</li> <li>• The ESFA should be included in discussions about potential site allocations</li> </ul>	<p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
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<p><b>Open Space and Outdoor Sports and Recreation</b> (Paras. 9.37 to 9.42)</p>	<ul style="list-style-type: none"> <li>Natural England’s Accessible Natural Green Space standards (ANGST) should be used when drafting an open space policy to ensure the delivery of sufficient levels of high quality informal open space</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Protecting and Enhancing our Environment</b> (Paras 10.1 to 10.4)</p>	<ul style="list-style-type: none"> <li>The Marine Management Organisation (MMO) supports reference to the emerging South East Marine Plan and the UK Marine Policy Statement</li> <li>MMO would support a meeting as part of the Duty to Co-operate to discuss marine planning</li> <li>Attention raised to the Coastal Concordat which provides a framework within which coastal developments in England can be better co-ordinated</li> <li>MMO is currently in the process of developing marine plans by 2021, including the ‘South East Marine Plan’</li> <li>RDC may wish to make reference to the MMO’s licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to</li> <li>In the absence of a marine plan, RDC may instead refer to the Marine Policy Statement for guidance</li> </ul>	<p>The Council has and will continue to engage with the Marine Management Organisation (MMO) in the preparation of both the new Local Plan and the emerging South East Marine Plan. Both plans will need to consider and complement each other and will specifically need to consider the implications of the other on coastal activities and marine development.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Green Belt</b></p>	<ul style="list-style-type: none"> <li>Sport England suggest that Green Belt policies take a positive approach to the principle of</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>

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(Paras. 10.5 to 10.16)	changing the use of land to outdoor sport where need exists	
<b>Biodiversity, Geology and Green Infrastructure</b> (Paras. 10.17 to 10.29)	<ul style="list-style-type: none"> <li>• Support for Strategic Objectives 19 and 22, however more importance should be given to the water environment, including reference to the Water Framework Directive</li> <li>• Support setting a requirement for all new development to create new priority habitats such as new wetlands, deciduous woodlands and wildflower meadows.</li> <li>• Natural England would support the updating of Option F to reflect the findings of the Local Wildlife Site review, and suggest a policy that merged options C to F would form a singular strategic nature conservation policy.</li> <li>• Support for safeguarding the long term capability of best and most versatile agricultural land as a resource for the future in line with the NPPF.</li> </ul>	<p>Consideration will be given to the need to safeguard prime agricultural land as the new Local Plan develops and potential locations for housing growth are considered.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<b>Wallasea Island the RSPB's Wild Coast Project</b> (Paras. 10.30 to 10.34)	<ul style="list-style-type: none"> <li>• Natural England support option A.</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<b>Landscape Character</b>	<ul style="list-style-type: none"> <li>• Support the link highlighted between landscape character and historic environment.</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>

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<p>(Paras. 10.35 to 10.44)</p>	<ul style="list-style-type: none"> <li>• Welcome the forthcoming landscape character assessment</li> <li>• Natural England supports the review of the Upper Roach Valley and Coastal Protection Belt as part of the local landscape character assessment.</li> </ul>	
<p><b>Protecting and Enhancing Heritage and Culture</b> (Paras. 10.45 to 10.52)</p>	<ul style="list-style-type: none"> <li>• Historic England support neither Option A or B as they fail to reflect changes to the NPPF.</li> <li>• Any policy should reflect listed buildings, scheduled monuments, archaeology, historic and designed landscape settings. This could be achieved either through 1 or 2 overarching policies, or individual policies on every aspect of the historic environment.</li> <li>• Term ‘historic environment’ would be preferred to ‘heritage and culture’</li> <li>• Policy should recognise multi-faceted benefits that conservation and enhancement of the historic environment can bring.</li> <li>• Important to identify opportunities in developments to enhance the historic environment through public realm improvements, public access or revealing significance.</li> <li>• Support reference to non-designated heritage assets, such as local lists.</li> <li>• Indicators to measure the success of historic environment policies are advised; these can</li> </ul>	<p>The need to protect, conserve and enhance the historic environment is an identified core objective of the new Local Plan and the Council will continue to work alongside Historic England to ensure that its proposed approach achieves this objective and aligns with national policy.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>

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	<p>include the preparation of a local list, conservation area action plan, etc.</p> <ul style="list-style-type: none"> <li>• Glossary defining consistent definition of heritage assets would be advised</li> </ul>	
<p><b>Good Design and Building Efficiency</b> (Paras. 10.53 to 10.63)</p>	<ul style="list-style-type: none"> <li>• Sport England supports high quality design and encourages the Council to recognise the role it plays in good planning and making places better for people. Sport England has produced guidance on Active Design which should be considered when the Council considers its design approach.</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Air Quality</b> (Paras. 10.64 to 10.72)</p>	<ul style="list-style-type: none"> <li>• Any development within 250m-500m of a site permitted by the Environment Agency could result in the proposed development being exposed to impacts including odour, noise, dust and pests. These factors should be considered when identifying areas for development.</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Basements</b> (Paras. 11.28 to 11.36)</p>	<ul style="list-style-type: none"> <li>• Basement developments can have implications for the historic environment which should be articulated in the forthcoming plan</li> <li>• Basements risk disturbing archaeology and can affect the setting and integrity of listed buildings. In layout terms, the creation of an additional storey below the property can have as significant harm as added an additional storey above.</li> </ul>	<p>It is noted that some basement development may fall within permitted development rights and that any policy which seeks to safeguard archaeological and heritage assets may therefore be undermined in practice.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>



	<ul style="list-style-type: none"> <li>• Policy should refer to archaeology and heritage assets, however robust evidence will be required to support this policy.</li> </ul>	
<p><b>Development of Previously Developed Land in the Green Belt</b> (Paras. 11.45 to 11.49)</p>	<ul style="list-style-type: none"> <li>• Re-development of brownfield sites should consider the contribution the site makes to the significance of any heritage assets.</li> <li>• When adding sites to Brownfield registers, consideration should be given to the need to conserve or enhance nearby heritage assets and their settings</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan and the Brownfield Register.</p>
<p><b>Light Pollution</b> (Paras. 11.73 to 11.76)</p>	<ul style="list-style-type: none"> <li>• Policies should address impacts on the natural environment in accordance with government guidance on light pollution.</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>

## 6 Summary of Representations made by Interest Groups / Trusts

6.1 The tables below provide a summary of the representations received from interest groups or trusts, as well as an initial response to the main issues raised.

6.2 The interest groups and trusts from which representations were received are the following:

- Essex Bridleways Association
- Essex Wildlife Trust
- Home Builders Federation
- Royal Society for the Protection of Birds (RSPB)
- Theatres Trust
- Woodland Trust

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<b>Element</b>	<b>Main issues raised</b>	<b>Initial response</b>
<p><b>How have you assessed the environmental impacts?</b> (Paras 1.12 to 1.3)</p>	<ul style="list-style-type: none"> <li>Habitat Regulations Assessments relating to previous development plans are not up to date. RSPB would look forward to commenting on any new HRA</li> </ul>	<p>The Council has, and will continue to work with all relevant stakeholders in relation to its obligations under the Habitats Regulations</p>
<p><b>South Essex Picture</b> (Paras 4.8 to 4.18)</p>	<ul style="list-style-type: none"> <li>Support for established Housing Market Area but it should be recognised that linkages exist with other neighbouring HMAs which may impact on how housing needs are met</li> <li>Support for principle of joint working but would suggest the Council seeks greater certainty that housing needs can be met within the HMA, and how</li> <li>RDC should look to ensure that Paragraph 181 of the NPPF is the goal of any co-operation with neighbouring authorities</li> <li>RSPB welcomes work being undertaken as part of the RAMS and would support a review of the 2005 Green Grid Strategy</li> </ul>	<p>The Council is committed to working collaboratively with neighbouring authorities across South Essex, including exploring the potential for a Joint Strategic Plan (JSP) and preparing joint evidence. Such joint evidence may include a South Essex Green and Blue Infrastructure Strategy which would supersede and expand upon the 2005 Green Grid Strategy.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Drafting our Vision</b> (Paras 5.9 to 5.10)</p>	<ul style="list-style-type: none"> <li>Vision should be expanded to include all users, including walkers, cyclists, equestrians and the disabled</li> <li>RSPB suggest “where possible” is deleted from lines 6/7 of this section as this may lead to stasis</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>

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<p><b>Drafting our Strategic Objectives</b> (Para 5.11)</p>	<ul style="list-style-type: none"> <li>• Strategic Objective 15 should be expanded to include all users, including equestrians who are often overlooked when infrastructure is planned</li> <li>• RSPB broadly support four strategic objectives under Strategic Priority 5 but recommend mention of “recreational areas” within a strategic objective based around natural environment</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Need for Market, Affordable and Specialist Homes</b> (Paras 6.5 to 6.33)</p>	<ul style="list-style-type: none"> <li>• Options A and B are not options but fundamental requirements of the plan-making process</li> <li>• RDC should consider how it will meet its own OAN as well as ensure the needs of the HMA are met in full. RDC should co-operate with its partners in the HMA to establish an effective strategic approach to housing delivery</li> <li>• RDC should not seek to restrict its housing requirement solely on the basis of environmental capacity; RDC will need to consider whether they are able to mitigate against any negative environmental impacts.</li> <li>• RDC should undertake an assessment of the planning constraints to development, including its Green Belt</li> <li>• With regard to option C, the Council should not seek to apply a ‘Rochford First’ approach as this is opposed to the operation of the free market and beyond the scope of the planning system</li> </ul>	<p>The Council’s approach to housing will be refined as local and sub-regional plan-making progresses. This will include undertaking significant evidence to understand the capacity of the District to meet its own housing needs, including Green Belt and landscape character assessments, highway modelling, and an updated land availability assessment. Evidence is also being produced to support a South Essex Joint Strategic Plan which will consider the capacity of South Essex to meet its needs as a whole and how any shortfall in needs could be met.</p> <p>The Council’s approach to affordable housing and internal standards will need to be viable, otherwise it will make its housing strategy undeliverable. The Council cannot set policies at a level that makes its overall housing strategy undeliverable.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>

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	<ul style="list-style-type: none"> <li>• RDC should set their affordable housing policy at a level that does not affect the viability of development, even if this means lowering the requirement</li> <li>• To increase the provision of affordable housing, RDC should consider increasing the quantity of land allocated for residential development</li> <li>• RDC should not apply the higher level Part M4(3) requirements to market homes due to the cumulative impact of these costs on development viability</li> </ul>	
<p><b>Delivering our Need for Homes</b> (Paras 6.37 to 6.48)</p>	<ul style="list-style-type: none"> <li>• All options set out should be considered and it is likely a mix will be required</li> <li>• RDC should provide a mix of development opportunities as set out in the Government Housing White Papers, including small sites</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Good Mix of Homes</b> (Paras 6.49 to 6.60)</p>	<ul style="list-style-type: none"> <li>• The Home Building Federation (HBF) do not consider it appropriate to set a target for the development of bungalows, due to the impact on viability and their space intensity</li> <li>• The current policy provides no real guidance on what a policy compliant scheme in terms of housing mix would look like. Option B would be supported in order to provide clear guidance with flexibility to vary mix based on viability</li> </ul>	<p>The Council's approach to bungalows and internal standards will consider the implications on development viability. The Council will not set policies that make its overall housing strategy undeliverable.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>

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	<ul style="list-style-type: none"> <li>If RDC continues to apply the nationally described space standard, this should be fully justified on the basis of need of viability</li> </ul>	
<b>Houseboats and Liveaboards</b> (Paras 6.79 to 6.86)	<ul style="list-style-type: none"> <li>RSPB support proposed approach to protecting designated sites that may be affected by the inappropriate positioning of houseboats</li> </ul>	Comments noted. These points will be considered when preparing future drafts of the new Local Plan.
<b>Supporting Tourism and Rural Diversification</b> (Paras 6.118 to 6.128)	<ul style="list-style-type: none"> <li>Wallasea Island should be accessible to equestrians to promote tourism.</li> <li>Any policy on Rural Diversification and Tourism should be expanded to consider the importance of including access for all, including equestrians.</li> </ul>	Comments noted. These points will be considered when preparing future drafts of the new Local Plan.
<b>Sustainable Travel</b> (Paras 8.22 to 8.37)	<ul style="list-style-type: none"> <li>Equestrians should be included where possible when considering new off-road routes for vulnerable users</li> </ul>	Comments noted. These points will be considered when preparing future drafts of the new Local Plan.
<b>Supporting Health, Community and Culture</b> (Paras 9.1 to 9.2)	<ul style="list-style-type: none"> <li>All user groups should be embedded into green infrastructure policy to create a network usable by all rather than discriminating against any user group</li> </ul>	Comments noted. These points will be considered when preparing future drafts of the new Local Plan.
<b>Health and Well-being</b>	<ul style="list-style-type: none"> <li>Policy should seek to increase the availability of off-road riding as this will benefit residents' health and well-being</li> </ul>	Comments noted. These points will be considered when preparing future drafts of the new Local Plan.

<p>(Paras 9.3 to 9.11)</p>		
<p><b>Community Facilities</b> (Paras 9.12 to 9.15)</p>	<ul style="list-style-type: none"> <li>• The new Local Plan should support arts and culture at all levels to support the local economy and ensure that all residents and visitors have access to cultural opportunities</li> <li>• Policies should protect, support and enhance cultural facilities and activities</li> <li>• Theatres Trust propose a policy that supports the development of new cultural and community facilities, incorporate cultural activity opportunities as part of major developments, resist loss or change of use of existing cultural and community facilities unless demonstrably not needed or being replaced, and supporting the temporary use of vacant buildings by creative, cultural or community organisations</li> <li>• Cultural and community facilities should be explained in a glossary</li> </ul>	<p>The new Local Plan identifies an objective to protect and enhance community facilities and any policy approach will seek to support that identified objective.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Open Spaces, Sports and Recreational Facilities</b> (Paras 9.37 to 9.42)</p>	<ul style="list-style-type: none"> <li>• Essex Bridleways Association should be engaged on any sports, recreation and open space evidence being produced</li> <li>• There is a need to join up the fragmented network to make it accessible to walkers, cyclists, equestrians and the disabled.</li> </ul>	<p>The Council will continue to engage and consult the Essex Bridleways Association to ensure they are provided with opportunities to inform and shape relevant policies.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>

<p><b>Biodiversity, Geology and Green Infrastructure</b> (Paras 10.17 to 10.29)</p>	<ul style="list-style-type: none"> <li>• Policy T7 should be amended to be more inclusive, including access for equestrians and the disabled</li> <li>• Policies on green and blue infrastructure should include increased access for all user groups, including equestrians.</li> <li>• New housing should be on sites well-served by infrastructure and should avoid harm to environmental assets</li> <li>• New housing should have a positive environmental impact and achieve landscape restoration and recovery</li> <li>• New housing should be designed to integrate space for both wildlife and people, reduce carbon emissions and minimise water usage</li> <li>• Nature-friendly development projects protect existing wildlife habitats and create new connecting habitats, contributing to the wider ecological network</li> <li>• Current policy should be strengthened to identify and enhance local and landscape-scale wildlife corridors and networks</li> <li>• Policies could be condensed and merged to strengthen the overall strategic approach to protecting and enhancing habitats</li> </ul>	<p>The Council’s approach to housing will need to take account of any implications on the environment and biodiversity. The new Local Plan and South Essex Joint Strategic Plan (JSP) will consider existing and emerging evidence on biodiversity including the Local Wildlife Sites review and any Green and Blue Infrastructure Strategies. Development would generally not be permitted in areas of high biodiversity value or which has significant impacts on biodiversity or ecological quality.</p> <p>The new Local Plan will also consider the role that green infrastructure plays in achieving health and well-being outcomes, and opportunities for new and improved green (and blue) infrastructure across the District.</p> <p>The Council continues to work and engage with the other Essex coastal authorities and Natural England as part of the Essex Coast RAMS Project. It is the Council’s intention to adopt a Supplementary Planning Document once complete that will set a tariff on new developments in order to fund and deliver mitigation measures that off-set the impact of recreational activities on environmentally sensitive sites.</p> <p>It is acknowledged that changes to the National Planning Policy Framework (NPPF) in July 2018</p>
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	<ul style="list-style-type: none"> <li>• The Local Wildlife Sites review should form the basis for robust protection of LoWS</li> <li>• Policy on greenways should be amended to include a commitment to ensure the delivery of strategic greenways across the district</li> <li>• RSPB welcomes strong policy position to protect and enhance sites and habitats.</li> <li>• Policy should recognise important species</li> <li>• The RSPB and other conservation organisations would be able to assist the Council in effectively mapping the distribution of species</li> <li>• RSPB would support Option A, however this should be supported by specific tailored actions</li> <li>• RSPB would support review of Green Grid Strategy</li> <li>• RSPB support Council's commitment to RAMS and suggest that where a development is likely to give rise to significant effect on internationally designated site, developers should be required to contribute to ensure that mitigation is delivered strategically</li> <li>• High quality green space close to people's homes should be provided to avoid increasing pressure on designated sites</li> </ul>	<p>have given greater protection to irreplaceable habitats, including ancient woodland and veteran trees. The Council will continue to engage and consult the Woodland Trust to ensure that its proposed approach fully aligns with national policy.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
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	<ul style="list-style-type: none"> <li>• All developments should be ‘nature friendly’</li> <li>• Woodland Trust would like to see policies on trees and woodlands strengthened to include ancient woodland protection. The Woodlands Access Standard can be used to calculate how much new woodland is needed in the district</li> <li>• Local Plan should refer to the role of trees, woods and green infrastructure in flood alleviation</li> </ul>	
<p><b>Wallasea Island and the RSPB’s Wild Coast Project</b> (Paras 10.30 to 10.34)</p>	<ul style="list-style-type: none"> <li>• Essex Bridleways Association would advocate opening up Wallasea Island to equestrian users to promote tourism</li> <li>• Standalone policy on Wallasea Island Wild Coast should be retained and not merged with any policies relating to Essex Marina</li> <li>• RSPB proudly support Option A and advocates continued close working between the Council and the RSPB</li> <li>• Intentions of existing policy URV2 should be retained</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Good Design and Building Efficiency</b> (Paras 10.53 to 10.63)</p>	<ul style="list-style-type: none"> <li>• The HBF does not object to local plans encouraging developers to include renewable energy but this should not be a mandatory requirement</li> <li>• HBF supports Option G to be consistent with the Government’s approach to building standards</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>

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<p><b>Air Quality</b> (Paras 10.64 to 10.72)</p>	<ul style="list-style-type: none"> <li>Any policy should consider a wider range of possible pollutants and also consider ways in which trees can contribute to air quality improvement</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Self-Build and Custom-Build Homes</b> (Paras 11.6 to 11.12)</p>	<ul style="list-style-type: none"> <li>RDC should consider the approach to Self-Build and Custom-Build homes set out in the PPG</li> <li>Option A would be inconsistent with national policy; Option D is considered the most appropriate option by the HBF</li> <li>RDC should consider what will happen to Self-Build plots should they not be sold, i.e. if they revert to the developer after 6 months</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Parking Standards and Traffic Management</b> (Paras 11.54 to 11.57)</p>	<ul style="list-style-type: none"> <li>In order to achieve higher densities and ensure schemes remain viable it may be necessary to reduce parking requirements in sustainable locations</li> <li>Policy should state where development would be appropriate below minimum standards</li> </ul>	<p>The Council will consider, as part of its new Local Plan, whether its existing parking standards are fit for purpose or whether there is justification to introduce new or revised parking standards. Any new or revised parking standards will need to consider implications on viability and possible exemptions, e.g. where the development site is well-served by public transport or public car parks.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>

## 7 Summary of Representations made by Parish/Town Councils

7.1 The tables below provide a summary of the representations received from Parish or Town Councils, as well as an initial response to the main issues raised.

7.2 The Parish and Town Councils from which representations were received are the following:

- Ashingdon Parish Council
- Hawkwell Parish Council
- Hockley Parish Council
- Hullbridge Parish Council
- Rawreth Parish Council
- Rayleigh Town Council
- Rochford Parish Council

Element	Main issues raised	Initial response
<b>Our Economy</b> (Paras 3.3 to 3.12)	<ul style="list-style-type: none"> <li>• Doubt expressed over Paragraph 3.5; ‘resident weekly earning are 670.9 which is higher than Essex and UK averages’</li> </ul>	These figures are based on Government statistics.
<b>Our Communities</b> (Paras 3.19 to 3.25)	<ul style="list-style-type: none"> <li>• Statements at Paragraph 3.20 are muddled; ‘proportion of residents aged 20-64 is expected to remain relatively stable’ vs ‘an increase in the older proportion of residents compared to the rest of the population..’</li> </ul>	In this context, older residents are taken to mean those aged 65 or over. Whilst the older population is expected to grow as proportion, the proportion of 20-64 is expected to remain stable.
<b>National Picture</b> (Paras 4.1 to 4.7)	<ul style="list-style-type: none"> <li>• At paragraph 4.3, the phrase ‘can competitively demonstrate’ pushes investment towards homes and jobs rather than infrastructure</li> <li>• Words ‘we must not over-burden investment in business’ are meaningless</li> </ul>	Comments noted. These points will be considered when preparing future drafts of the new Local Plan.

	<ul style="list-style-type: none"> <li>• The first priority should be what is at number 3</li> </ul>	
<p><b>Delivering Homes and Jobs</b> (Paras 6.1 to 6.4)</p>	<ul style="list-style-type: none"> <li>• Developers should be encouraged to build 1 and 2 bed properties to assist first time buyers and older residents</li> <li>• On larger developments, a percentage of property should be set aside for local residents at a reduced price</li> <li>• Empty houses should be brought back into use before allowing more new development</li> </ul>	<p>As part of the new Local Plan, the Council will consider how to deliver the best mix of house sizes on new developments. This may include considering if there is a need to provide more smaller homes.</p> <p>Whilst the Council can try to work with developers to set aside a proportion of new homes for people with a local connection, it is unlikely that a specific, enforceable policy would be found sound as it is likely to be considered beyond the remit of the planning system and contrary to market forces.</p> <p>Whilst the planning system currently has limited powers to bring empty homes back into use, the issue is being considered at government-level and it may be that new powers are introduced outside of the planning system. Initiatives such as the Well Homes Empty Property Grant<sup>1</sup> are being driven by the Council’s housing team to help bring empty properties back into residential use.</p>
<p><b>Need for Market, Affordable and Specialist Homes</b></p>	<ul style="list-style-type: none"> <li>• Insufficient affordable or suitable housing available for first time buyers</li> <li>• Additional 7000+ dwellings would be unsustainable</li> </ul>	<p>The Council is expected to prepare a Local Plan which delivers its identified housing needs in full over a 15 year period. Where it is unable to do so, the reasons why this is the case must be strongly evidenced. The Council is not yet at the stage in its plan-making to understand the scale of housing</p>

<sup>1</sup> <https://www.rochford.gov.uk/well-homes-empty-property-grant>

<p>(Paras 6.5 to 6.33)</p>	<ul style="list-style-type: none"> <li>• Environmental Capacity Study 2015 suggested only small scale expansion of existing settlements could be sustainable</li> <li>• This may rule out new settlement although this could be best option to provide infrastructure</li> <li>• Hullbridge could not sustain further development other than small infills</li> <li>• Hullbridge has seen a 20%+ increase in dwellings since current District Plan</li> <li>• Hullbridge is over 5km from nearest secondary school, railway station and shopping centre and has only a single bus route, there is also already high traffic levels</li> <li>• It has been reported that London councils are bulk-buying properties however if this has happened it is not natural migration and must be resisted in order to meet local need</li> <li>• Rawreth Parish Council support a combination of Options A and C with respect to meeting the District’s housing needs</li> <li>• Rawreth Parish Council would support a combination of Options A and C with respect to affordable homes</li> </ul>	<p>growth that can be sustainably delivered within the District, however this issue will be considered in great detail as the new Local Plan and South Essex Joint Strategic Plan (JSP) develop. The sustainability of potential options will be a fundamental consideration and will be informed by comments such as these, as well as existing and emerging evidence, and national policy.</p> <p>The Council has limited power to directly influence who is buying new homes in the District, and it would generally be considered beyond the remit of the local planning authority to introduce a policy that tries to resist migration from other areas.</p> <p>Currently, the Council’s housing team provide advice on the size of affordable homes needed on larger development sites, and this advice is based on their understanding of local needs. Comments relating to the size of affordable homes being delivered will be passed to this team to consider.</p> <p>As the District’s demographic base shifts, in particular towards a more elderly population, the specific housing needs will need to be considered in detail as the new Local Plan develops. This will include exploring policies to secure housing of the mix and type most suitable for elderly residents.</p>
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	<ul style="list-style-type: none"><li>• Rawreth Parish Council would support a combination of Options D and E with respect to affordable housing thresholds</li><li>• Rawreth Parish Council would support integration of homes for older people and adults with disabilities within developments</li><li>• RDC’s responsibility restricted to ensuring sufficient land is available for development and that there are no unreasonable planning hurdles put in the way</li><li>• Rayleigh Town Council support Option A</li><li>• Rayleigh Town Council suggest Option C could not work; defining ‘right to residence’ fraught with difficulties</li><li>• Rayleigh Town Council support Option A with respect to specialist homes. Central government should be persuaded to allow RDC to increase rates paid by everybody already in the district and put money away earmarked for that purpose</li><li>• Very few 1, 2 or 3 bedroom houses are offered as affordable (mainly being 1 or 2 bed flats). This should be looked at by way of subsidies if it cannot be enforced.</li><li>• Local people need to be able to live in the town they grow up in</li></ul>	
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	<ul style="list-style-type: none"> <li>• More temporary accommodation should be provided for those made homeless</li> <li>• More smaller units should be provided so that the elderly are able to downsize</li> <li>• Smaller units should be in areas designated for the elderly</li> <li>• Space should be created for building nursing homes to deal with increasing elderly population who need care</li> <li>• Rochford Parish Council support Option C with respect to market homes</li> <li>• Rochford Parish Council support Options B and D with respect to affordable homes</li> <li>• Rochford Parish Council support Option B with respect to specialist homes</li> </ul>	
<p><b>Need for Care Homes</b> (Paras 6.34 to 6.36)</p>	<ul style="list-style-type: none"> <li>• Rawreth Parish Council support Option B</li> <li>• Rayleigh Town Council support Option A</li> <li>• Rochford Parish Council support Option B</li> </ul>	<p>Support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Delivering our Need for Homes</b> (Paras 6.37 to 6.48)</p>	<ul style="list-style-type: none"> <li>• Housing needs should be accommodated in a new settlement in the far west of the District near Battlesbridge or Rawreth for access reasons</li> <li>• Hawkwell Parish Council consider Hawkwell and Rochford Parishes to have had most of the</li> </ul>	<p>The distribution of housing growth will be considered in greater detail as the new Local Plan develops. The sustainability of potential options or locations for housing growth will be a fundamental consideration, and will be informed by comments</p>

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	<p>development in the present local plan, therefore do not support Options A or D</p> <ul style="list-style-type: none"> <li>• Rawreth Parish Council rank options A, B, E, C, D in order of preference</li> <li>• Density should be increased near town centres and transport hubs</li> <li>• Large extensions to existing residential areas are becoming too remote from town hubs</li> <li>• Possibility of a new settlement south west of Rayleigh / East of Hullbridge / North of Ashingdon but only if infrastructure is improved with national investment</li> <li>• Rayleigh Town Council support Option E- this would enable something special to be made with minimal disturbance to the existing residents of the district and would be easier on the road network</li> </ul>	<p>such as these as well as existing and emerging evidence.</p> <p>There is an expectation that a South Essex Joint Strategic Plan (JSP) will provide the framework for determining the spatial distribution (location and amount) of housing growth in South Essex over the next 20 years. Whilst the South Essex JSP is still in its infancy, it will be subject to extensive public consultation, beginning in Spring 2019, and will be informed by the preparation of evidence which is still ongoing.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Good Mix of Homes</b> (Paras 6.49 to 6.60)</p>	<ul style="list-style-type: none"> <li>• Hawkwell Parish Council would support Options E and F to provide and safeguard bungalows</li> <li>• Conversion/expansion of bungalows should be limited in order to maintain supply</li> <li>• If new bungalows were designed with a low roof pitch this would prevent their conversion under permitted development and would limit their visual impact</li> </ul>	<p>A policy to encourage the provision and retention of bungalows will be considered as the new Local Plan develops but would need to be supported by suitable evidence and be compatible with national policy. The impact of such a policy on viability will also need to be considered.</p> <p>All other comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>



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	<ul style="list-style-type: none"> <li>• Many older homeowners would like to downsize to a small bungalow with a little garden. Market developments like Rydal Close and Mayfield Avenue could fit that need</li> <li>• Rawreth Parish Council support Options B and F</li> <li>• Rayleigh Town Council support Option A</li> <li>• Rayleigh Town Council suggest Option E is worth considering.</li> <li>• Rayleigh Town Council suggest Option I is sensible. If bungalows are sought, lower densities will need to be acceptable. If affordable housing is sought, then higher density needed</li> <li>• Rochford Parish Council support Options C, E, F and H</li> </ul>	
<p><b>Gypsy, Travellers and Travelling Showpeople</b> (Paras 6.61 to 6.78)</p>	<ul style="list-style-type: none"> <li>• Hullbridge Parish Council would support the development of Michelins Farm as a site for Travellers</li> <li>• Rawreth Parish Council support Option B and E; they support Michelins Farm provided it is in RDC's control and monitored</li> <li>• Paragraph 6.74 states unauthorised sites are pursued through enforcement powers however in the case of Cherry Hill site on the A1245 there is no evidence of this</li> </ul>	<p>The Council will continue to support the development of Michelins Farm as a site for Gypsy and Traveller accommodation, but will need to consider whether the policy approach taken to such accommodation is working. If it is no longer considered fit for purpose, a new approach may need to be considered, including the potential allocation of new or additional sites.</p> <p>The Council continues to take enforcement action against unauthorised sites where it is justified to do so. As the Council's allocated site, Michelins Farm, has yet to be delivered the Council is assessing</p>

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	<ul style="list-style-type: none"> <li>• Rayleigh Town Council support Option B</li> <li>• Rochford Parish Council support Option B</li> </ul>	<p>planning applications on alternative sites on their individual merits.</p> <p>All other comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Houseboats and Liveaboards</b> (Paras 6.79 to 6.86)</p>	<ul style="list-style-type: none"> <li>• No liveaboards should be allowed outside existing marinas</li> <li>• Rawreth Parish Council support Option C to safeguard open aspects of the shoreline of rivers</li> <li>• Rayleigh Town Council support Option B</li> <li>• Rochford Parish Council support Option B</li> </ul>	<p>Comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Meeting Business Needs</b> (Paras 6.87 to 6.96)</p>	<ul style="list-style-type: none"> <li>• Rawreth Parish Council support Option C and add that there needs to be connectivity with the national network to attract new business and redress imbalance and outflow with other areas</li> <li>• Rayleigh Town Council support Options B, C and E</li> <li>• Rochford Parish Council support Options B and C</li> </ul>	<p>Comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Need for Jobs</b> (Paras 6.97 to 6.111)</p>	<ul style="list-style-type: none"> <li>• Rawreth Parish Council support a combination of Options A, C, E and F with option B being worthy of consideration</li> <li>• The increasing leisure uses on industrial sites makes these sites unattractive to further business use</li> </ul>	<p>Comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>

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	<ul style="list-style-type: none"> <li>• Some sites are inaccessible due to congestion and poor roads, e.g. Brook Road, Eldon Way and Purdeys Way</li> <li>• Rayleigh Town Council support Options B, D and E</li> <li>• Rochford Parish Council support Options A and F</li> </ul>	
<p style="text-align: center;"><b>London Southend Airport</b> (Paras 6.112 to 6.117)</p>	<ul style="list-style-type: none"> <li>• Rayleigh Town Council support Options A, B, C and D</li> <li>• Rochford Parish Council support Options A and D</li> </ul>	Support noted. These points will be considered when preparing future drafts of the new Local Plan.
<p style="text-align: center;"><b>Supporting Tourism and Rural Diversification</b> (Paras 6.118 to 6.128)</p>	<ul style="list-style-type: none"> <li>• Although Hullbridge Parish Council welcomes tourism, it is concerned that additional accommodation businesses and tourist numbers could affect environmentally sensitive areas</li> <li>• Rawreth Parish Council support Option A</li> <li>• Chelmsford City Council, Rawreth Parish Council and Rettendon Parish Council should be involved in Crouch Coastal Community Team – which should include the river up to Battlesbridge</li> <li>• Local businesses need broadband however tourists do not</li> <li>• Rayleigh Town Council support Option B</li> <li>• Rochford Parish Council support Options A and B</li> </ul>	<p>Comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.</p> <p>Relevant comments will be passed to the Crouch Coastal Community Team to consider.</p>

<p><b>Retail, Leisure and Town Centres</b> (Paras 7.3 to 7.20)</p>	<ul style="list-style-type: none"> <li>• Hullbridge Parish Council support land being used for employment including retail/shops in the District</li> <li>• Rawreth Parish Council support Option A</li> <li>• Enjoyment of town centre facilities restricted by parking issues</li> <li>• Out of Town shopping centres, A127, Lakeside, Southend Airport have free parking which diverts resources away from small independent shops to large national chains</li> <li>• Government promised levy on free parking to help subsidise local centres</li> <li>• Rayleigh Town Council support Options A, B, C and D</li> <li>• Rayleigh Town Council support more shopping facilities</li> <li>• Rochford Parish Council support Option C</li> </ul>	<p>The management of car parks is outside of the scope of the new Local Plan. Any existing issues with the District’s car parks will be passed to the relevant team within the Council to consider opportunities to improve parking provision in town centres.</p> <p>All other comment and support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Villages and Local Neighbourhood Centres</b> (Paras 7.21 to 7.27)</p>	<ul style="list-style-type: none"> <li>• Hawkwell Parish Council would support Option A to retain facilities without which villages would decline</li> <li>• Rayleigh Town Council supports Options A and B</li> <li>• Supporting local facilities in village and neighbourhood centres outside of RDC’s sphere of influence and should not be worried about</li> </ul>	<p>Comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>

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	<ul style="list-style-type: none"> <li>• Rochford Parish Council support Options A and B</li> </ul>	
<p style="text-align: center;"><b>Delivering Infrastructure</b> (Paras 8.1 to 8.2)</p>	<ul style="list-style-type: none"> <li>• There is little provision for improvement to infrastructure which must be given priority as district cannot sustain existing level of development</li> <li>• Doubts over whether Hullbridge sewerage plant has capacity to cope with proposed Malyons Farm development or any additional dwellings in the future</li> <li>• If new road is funded, the east of the District would no longer be rural and isolated</li> </ul>	<p>The Council will continue to work with all infrastructure providers to ensure that the new Local Plan is sustainable in the context of infrastructure. This will include on the topic of both roads and sewerage. The new Local Plan will also support the delivery of any infrastructure improvements needed.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p style="text-align: center;"><b>Highways Infrastructure</b> (Paras 8.3 to 8.21)</p>	<ul style="list-style-type: none"> <li>• Ashingdon Road most crowded non-B road in Essex. Ashingdon Parish Council cannot see how associated vehicles could be accommodated without further gridlock</li> <li>• Hawkwell Parish Council would support Option B to support and direct funds to improve the local highway network between Rayleigh, Hockley and Rochford</li> <li>• Hawkwell Parish Council would not support Option C as narrow winding roads are unsuitable for an increase in traffic movements</li> <li>• Opposed to highway changes or development to the East which could encourage more traffic to Lower Road</li> </ul>	<p>The Council will continue to work with Essex County Council as the local highway authority to explore opportunities to improve the local highway network and prioritise investment into issue areas. The Council intends to prepare detailed evidence to understand and evaluate the capacity of the District's road network to support growth as part of the new Local Plan as well as identifying opportunities to provide and fund improvements as part of an Infrastructure Delivery Plan. Existing issue areas and options for improvement identified in these comments will be considered as part of that process.</p> <p>All other comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>

	<ul style="list-style-type: none"> <li>• The previously suggested Rochford Outer Bypass would be considered unwelcome by Hullbridge Parish Council as it would increase pressure for development along its route and potentially damaging Rayleigh Club golf course</li> <li>• There may be potential to widen the A127 from 4 to 6 lanes from the M25 as far as the Bell</li> <li>• Lower Road, East of Ferry Road is shown as a bus route however there is no regular service except for school buses</li> <li>• Rawreth Parish Council support Option B and object to Option C</li> <li>• Central government should invest in our future by alleviating the congestion by a river crossing between Hullbridge and Fambridge to link with the Burnham Road – the whole road should go through to the Tesco roundabout on A127 and could be linked to new settlement</li> <li>• A bypass is not needed around Rayleigh but from the A130 to the eastern side of Southend</li> <li>• Local views that Rayleigh Weir upgrades have made little difference</li> <li>• Rayleigh Town Council support Option C as other options not solve problems</li> <li>• Essex County Council should ensure all new streets are adopted immediately upon completion</li> </ul>	
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	<p>to allow traffic regulations to be introduced and lighting adopted</p> <ul style="list-style-type: none"> <li>• West Rayleigh developments should consider the need for a second access road</li> <li>• Rochford Parish Council support Options A and B. Concerns whether Option C would be able to accommodate significant increases in traffic flow without a major infrastructure investment</li> </ul>	
<p><b>Sustainable Travel</b> (Paras 8.22 to 8.37)</p>	<ul style="list-style-type: none"> <li>• Rawreth Parish Council support Option A, C and E</li> <li>• Green Grid strategy was promised in the Core Strategy but seems to have disappeared in Countryside plans</li> <li>• There is a need for joined up pedestrian/cycle ways to provide a meaningful and safe network</li> <li>• Buses need to be convenient and cost effective alternatives to private vehicles</li> <li>• Improvements to cycling around Rayleigh town centre are wishful as three out of four approaches involve cycling uphill in poor air quality</li> <li>• Measures suggested at Paragraph 8.31 are inadequate. More traffic lights needed and pedestrian crossings moved/removed.</li> <li>• Mode share suggested at Paragraph 8.34 is wishful and cannot be influenced</li> </ul>	<p>The Council will continue to work with Essex County Council to deliver opportunities to improve sustainable transport options in the District, including public transport, walking and cycling. As part of the new Local Plan, the Council will explore opportunities to deliver improvements to cycle networks and public transport routes, including as part of new developments. Existing issue areas and options for improvement identified in these comments will be considered as part of that process.</p> <p>All other comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>

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	<ul style="list-style-type: none"> <li>• Rayleigh Town Council support Options A, C and E and object to Option B and D</li> <li>• Public transport links should be improved</li> <li>• Rochford Parish Council support Options B and C</li> </ul>	
<b>Communications Infrastructure</b> (Paras 8.38 to 8.44)	<ul style="list-style-type: none"> <li>• Rayleigh Town Council support Option B</li> <li>• Rochford Parish Council support Option B</li> </ul>	Support noted. These points will be considered when preparing future drafts of the new Local Plan.
<b>Water and Flood Risk Management</b> (Paras 8.45 to 8.58)	<ul style="list-style-type: none"> <li>• Rawreth Parish Council support A and C which should be combined</li> <li>• Rawreth is at risk from development upstream of the brook system</li> <li>• Co-operation between each authority needed to minimise risk in Rawreth and the River Crouch</li> <li>• Sea defences in Rawreth need upgrading</li> <li>• In exceptionally wet years, the impermeable clay can become saturated and ground water becomes an issue</li> <li>• Flood risk from highway improvements should be modelled</li> <li>• Water Cycle Study 2015 should be updated to take account of new future housing</li> <li>• Rayleigh Town Council support Options A and C</li> </ul>	<p>A new Strategic Flood Risk Assessment (SFRA) was prepared in July 2018 which provides a source of up to date evidence on flood risk across Rochford District. This SFRA is available to read on the Council’s website and will be used to inform future drafts of the new Local Plan.</p> <p>The Water Cycle Study may be updated in the near future in conjunction with neighbouring local authorities.</p> <p>All other comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>



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	<ul style="list-style-type: none"> <li>• Drainage networks should be overhauled to support new builds</li> <li>• Rochford Parish Council support Option C</li> </ul>	
<p><b>Renewable Energy Generation</b> (Paras 8.59 to 8.66)</p>	<ul style="list-style-type: none"> <li>• Rayleigh Town Council support Option A</li> <li>• New dwellings should facilitate use of solar and other renewable energy schemes</li> <li>• Rochford Parish Council support Option B</li> </ul>	<p>Comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Planning Obligations and Standard Charges</b> (Paras 8.67 to 8.75)</p>	<ul style="list-style-type: none"> <li>• Rayleigh Town Council support Option A</li> <li>• All developments should be made to contribute to the infrastructure of the area in which it is being built (i.e. Section 106s)</li> <li>• Rochford Parish Council support Option A</li> </ul>	<p>The Council continues to secure developer contributions to infrastructure where they are justified and necessary to support a development. The main way that this is currently achieved is through a legal agreement between the Council, developer and infrastructure providers ('Section 106' agreements) but the Council also intends to introduce a Community Infrastructure Levy (CIL) charging schedule in 2021 which will provide an alternative way in which to collect necessary contributions towards local infrastructure.</p> <p>All other comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Supporting Health, Community and Culture</b></p>	<ul style="list-style-type: none"> <li>• Hospitals, doctors, social services, schools etc. are struggling and concerns raise that increases in housing and potential mergers of local hospitals</li> </ul>	<p>The Council will continue to work with all infrastructure providers, including Essex County Council and the NHS, to ensure that the new Local Plan can be sustainably supported by infrastructure. This will include collecting</p>

<p>(Paras 9.1 to 9.2)</p>	<p>will increase pressure on providers and communities</p>	<p>contributions from developers to fund the improvements needed to support any proposed developments. Where the development is large enough, these contributions may need to provide entire new facilities, such as schools or healthcare facilities.</p> <p>The role of developer contributions is primarily to fund improvements to infrastructure needed to support new developments, and not to fix existing problems. Wider funding issues with public bodies are generally outside of the remit of the local planning authority.</p>
<p><b>Health and Well-being</b> (Paras 9.3 to 9.11)</p>	<ul style="list-style-type: none"> <li>• Local hospitals and health centres would not be able to support additional development without considerable investment</li> <li>• Rawreth Parish Council would support Option D with land allocation support</li> <li>• Rayleigh Town Council support Option D</li> <li>• Facilities need to be provided including GP surgeries, health/medical centres and dentists, plus investment in hospitals</li> <li>• Rochford Parish Council support Option D</li> </ul>	<p>The Council will continue to work with the NHS to ensure that the new Local Plan is sustainably supported by healthcare facilities. This will include collecting contributions from developers to fund the improvements needed to support new developments. Where the development is large enough, these contributions may need to provide a new healthcare facility.</p> <p>The role of developer contributions is primarily to fund improvements to infrastructure needed to support new developments, and not to fix existing problems. Wider funding issues with public bodies are generally outside of the remit of the local planning authority.</p>

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		<p>All other comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p align="center"><b>Community Facilities</b> (Paras 9.12 to 9.15)</p>	<ul style="list-style-type: none"> <li>• Rayleigh Town Council support Option B</li> <li>• Recycling facility should be expanded and improved to accommodate the increase in need</li> <li>• There is insufficient car parking to accommodate any increase in need. New towns would make it easier to create this</li> <li>• Rochford Parish Council support Option B</li> </ul>	<p>Comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p align="center"><b>Education and Skills</b> (Paras 9.16 to 9.29)</p>	<ul style="list-style-type: none"> <li>• Hawkwell Parish Council would support a combination of Options A and B; land allocated for schools must not be allowed to be used for other purposes</li> <li>• Current secondary schools have little room for further expansion and it is questionable whether there is room for a new one</li> <li>• Rawreth Parish Council support Option A, B, D and E</li> <li>• Question raised over expansion of St Nicholas' School</li> <li>• Each new development should be treated individually to ensure adequate land is set aside for school sites</li> </ul>	<p>The Council will continue to work with Essex County Council to ensure that the new Local Plan is sustainably supported by education facilities. This will include collecting contributions from developers to fund the improvements needed to support new developments.</p> <p>The role of developer contributions is primarily to fund improvements to infrastructure needed to support new developments, and not to fix existing problems. Wider funding issues with public bodies are generally outside of the remit of the local planning authority.</p>

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	<ul style="list-style-type: none"> <li>• Secondary school provision for ages 16 to 19 should be considered and addressed</li> <li>• Rayleigh Town Council support Options A and B</li> <li>• More school places need to be created</li> <li>• Rochford Parish Council support Options A, B, D and E</li> </ul>	
<p><b>Early Years and Childcare Provision</b> (Paras 9.30 to 9.36)</p>	<ul style="list-style-type: none"> <li>• Hawkwell Parish Council would support Option B as Hawkwell is short of these places</li> <li>• Hullbridge has at least two pre-schools, not one is in the document</li> <li>• Rayleigh Town Council support Options A and B</li> <li>• Rochford Parish Council support Option B</li> </ul>	<p>Comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Open Spaces and Outdoor Sports and Recreation</b> (Paras 9.37 to 9.42)</p>	<ul style="list-style-type: none"> <li>• There should be a re-appraisal and comprehensive census of all sports facilities in Rochford</li> <li>• Concerns expressed over the quality and use of Council owned facilities</li> <li>• Council should review their facilities and invest in improvements to attract profitable use</li> <li>• Concerns over lack of choice amongst options</li> <li>• Any new settlements created should include cycle paths/bridleways, recreational grounds with sports facilities, youth facilities and allotments</li> </ul>	<p>The Council, in partnership with local authorities across South Essex, has commissioned an assessment of Playing Pitches and Indoor Facilities across the sub-region. This assessment, once complete, will help to inform the new Local Plan by providing an up to date and robust source of evidence on both the quantity and quality of sports and recreational facilities in the District, and their capacity to support future population growth. Where it is identified that new or improved facilities are required to support this growth, developers will be required to contribute to the funding of these facilities.</p>

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	<ul style="list-style-type: none"> <li>• Rochford Parish Council support Options A, B, C and D</li> </ul>	<p>Any concerns about the existing quality of Council-owned facilities will be passed to the Council’s Leisure Team for consideration.</p> <p>A Green and Blue Infrastructure Study is being commissioned across South Essex which will consider the role that green spaces play in South Essex and identify opportunities for improvement. It is intended that this study will help to inform local plan-making across South Essex, as well as the South Essex Joint Strategic Plan.</p>
<p><b>Indoor Sports and Leisure Centres</b> (Paras 9.43 to 9.50)</p>	<ul style="list-style-type: none"> <li>• Rayleigh Town Council support Option A</li> <li>• Rochford Parish Council support Option A</li> </ul>	<p>Support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Facilities for Young People</b> (Paras 9.51 to 9.56)</p>	<ul style="list-style-type: none"> <li>• Rayleigh Town Council support Option A</li> </ul>	<p>Support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Play Space Facilities</b> (Paras 9.57 to 9.61)</p>	<ul style="list-style-type: none"> <li>• Building on some greenfield may be preferential to trying to squash more and more development into existing towns and villages</li> <li>• Rayleigh Town Council support Option A</li> <li>• Rochford Parish Council support Options B and C</li> </ul>	<p>Comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>

<p><b>Green Belt</b> (Paras 10.5 to 10.16)</p>	<ul style="list-style-type: none"> <li>• The Green Belt to the east and west of Hullbridge village is important due to its proximity to the environmentally sensitive River Crouch</li> <li>• Malyons Farm development was described by RDC as providing a ‘defensible green belt boundary’</li> <li>• Can Green Belt be expanded as well as reduced to facilitate development?</li> <li>• Sixth principle in food production should be added to encourage locally produced sustainable food</li> <li>• Is the land to the west of the western boundary of the North of London Road allocation still classified as Green Belt?</li> <li>• Majority of Green Belt in Rochford is maintaining a sense of openness between the built up areas to the west and the sea to the east</li> <li>• Rayleigh Town Council support Option B</li> <li>• Good border of Green Belt should be retained between built up areas</li> <li>• Rochford Parish Council support Option B</li> </ul>	<p>The Council, in partnership with Southend-on-Sea Borough Council, has jointly commissioned a Green Belt assessment which will provide an up to date qualitative and quantitative assessment of the District’s Green Belt, against the five purposes of the Green Belt established in national policy. This assessment will help to inform the new Local Plan, particularly with respect to potential housing and employment locations. It should be noted that the Council’s approach to Green Belt must accord with national policy.</p> <p>The Council’s current Green Belt boundaries are set out in the Allocations Plan (2014), as amended by the London Southend Airport and Environs Joint Area Action Plan (2014) which is available online.</p> <p>All other comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Biodiversity, Geology and Green Infrastructure</b></p>	<ul style="list-style-type: none"> <li>• Rayleigh Town Council support Option A, C, D, E, F and H</li> <li>• Rayleigh Town Council do not support Option G</li> </ul>	<p>Comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>

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<p>(Paras 10.17 to 10.29)</p>	<ul style="list-style-type: none"> <li>• Rochford Parish Council support Options A, G and H</li> </ul>	
<p><b>Wallasea Island and the RSPB's Wild Coast Project</b>  (Paras 10.30 to 10.34)</p>	<ul style="list-style-type: none"> <li>• Although this would seem a worthwhile project, there have been comments that this increased flow rates and erosion upstream on both the Rivers Crouch and Roach</li> <li>• Rayleigh Town Council support Options A and B</li> <li>• Rochford Parish Council support Option B</li> </ul>	<p>Comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Landscape Character</b>  (Paras 10.35 to 10.44)</p>	<ul style="list-style-type: none"> <li>• Should not go overboard extolling the virtues of the countryside</li> <li>• Concerns over development being pushed west on landscape terms</li> <li>• Rayleigh Town Council support Options A and B</li> <li>• Rochford Parish Council support Options C and D</li> </ul>	<p>The Council, in partnership with Southend-on-Sea Borough Council, has commissioned a Landscape Character assessment which will provide an up to date qualitative and quantitative assessment of the District's landscape character and quality. This assessment will help to inform the new Local Plan, particularly with respect to potential growth locations.</p> <p>All other comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Protecting and Enhancing Heritage and Culture</b>  (Paras 10.45 to 10.52)</p>	<ul style="list-style-type: none"> <li>• Rayleigh Town Council support Option A</li> <li>• Rochford Parish Council support Option A</li> </ul>	<p>Comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>

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<p><b>Good Design and Building Efficiency</b> (Paras 10.53 to 10.63)</p>	<ul style="list-style-type: none"> <li>• RDC should just follow national guidelines, Essex Design Guide and building regulations</li> <li>• Rayleigh Town Council support Options A and K</li> <li>• New dwelling should have character and ample gardens</li> <li>• Rochford Parish Council support Options B and C</li> <li>• Rochford Parish Council support Options C and J</li> </ul>	<p>Comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Air Quality</b> (Paras 10.64 to 10.72)</p>	<ul style="list-style-type: none"> <li>• Evidence that this has reached dangerous level in many local areas which will increase with more traffic</li> <li>• Rayleigh has been recorded as highest for poor air quality; developments will intensify situation</li> <li>• Rawreth Parish Council support Option B; all new housing must incorporate PV panels or tiles on the roof and we should encourage sustainable travel</li> <li>• Rayleigh Town Council support Option A; doubt Options B or C will make difference</li> <li>• Rayleigh Town Council has previously submitted a comprehensive plan for traffic management which address congestion and air quality hot spots</li> <li>• Existing road networks need to be improved for free flowing traffic to reduce pollution and road improvements should be considered</li> </ul>	<p>An Air Quality Management Area (AQMA) has been designated in Rayleigh Town Centre, and residential development will be restricted in that area until such time that air quality reduces to accepted levels. Work is also underway between ECC and RDC to address air quality along the A127 which was identified in the Government's national Air Quality Plan.</p> <p>The issue of air quality will be considered in depth as the new Local Plan develops, and the impact of growth on air quality will be a fundamental consideration in identifying a preferred policy approach.</p> <p>Comments or concerns around existing air quality levels will be passed to the Council's environmental health team for consideration.</p>



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	<ul style="list-style-type: none"> <li>• Rochford Parish Council support Option B</li> </ul>	
<p><b>Mix of Affordable Homes</b> (Paras 11.2 to 11.5)</p>	<ul style="list-style-type: none"> <li>• Rochford Parish Council support Option G</li> </ul>	Support noted. These points will be considered when preparing future drafts of the new Local Plan.
<p><b>Self-Build and Custom-Build Housing</b> (Paras 11.6 to 11.12)</p>	<ul style="list-style-type: none"> <li>• Central government should sort out VAT rating for new builds</li> <li>• Rayleigh Town Council support Option D</li> <li>• Rochford Parish Council support Option B</li> </ul>	Comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.
<p><b>Rural Exception Sites</b> (Paras 11.13 to 11.19)</p>	<ul style="list-style-type: none"> <li>• Recognise the need for affordable housing in rural areas by small well designed sites in rural areas</li> <li>• Continue the need for agricultural workers where new demand appears</li> <li>• Developments could be instigated by Parish Councils</li> <li>• RDC should not waste time or effort worrying about a situation that has not arisen yet</li> <li>• Assess any applications on its merits and leave to Development Committee</li> <li>• Rayleigh Town Council support Option B</li> </ul>	Comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.

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<p><b>Annexes, Outbuilding and Independent Homes</b> (Paras 11.20 to 11.27)</p>	<ul style="list-style-type: none"> <li>• Use of outbuildings for living accommodation should only be allowed if they were originally built and used for a legitimate purpose and must remain ancillary to the main home and not in Green Belt</li> <li>• Rayleigh Town Council support Option B</li> <li>• Rochford Parish Council support Option A</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Basements</b> (Paras 11.28 to 11.36)</p>	<ul style="list-style-type: none"> <li>• Rayleigh Town Council support Option A</li> <li>• Rochford Parish Council support Option A</li> </ul>	<p>Support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Replacement, Rebuild or Extensions of Existing Green Belt Homes</b> (Paras 11.37 to 11.40)</p>	<ul style="list-style-type: none"> <li>• Rayleigh Town Council support Option B</li> <li>• Rochford Parish Council support Option B</li> </ul>	<p>Support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Agricultural, Forestry and Other Occupational Homes</b> (Paras 11.41 to 11.44)</p>	<ul style="list-style-type: none"> <li>• Doubt over whether refusing to remove agricultural occupancy conditions is sensible as this could lead to empty and derelict homes</li> <li>• Rochford Parish Council support Option A</li> </ul>	<p>Comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>

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<p><b>Development of Previously Developed Land in the Green Belt</b>  (Paras 11.45 to 11.49)</p>	<ul style="list-style-type: none"> <li>• Each site should be judged on its merits</li> <li>• Derelict agricultural/forestry areas could be appropriate in some cases, e.g. Hambro Nurseries Rawreth</li> <li>• Rayleigh Town Council support Option A and B</li> <li>• Rochford Parish Council support Option A</li> </ul>	<p>Comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Extension of Domestic Gardens in the Green Belt</b>  (Paras 11.50 to 11.53)</p>	<ul style="list-style-type: none"> <li>• Rayleigh Town Council support Option A</li> <li>• Rochford Parish Council support Option B</li> </ul>	<p>Support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Parking Standards and Traffic Management</b>  (Paras 11.54 to 11.57)</p>	<ul style="list-style-type: none"> <li>• Rayleigh Town Council support Options A and B</li> <li>• New dwellings should have ample parking to omit the need to park on the road</li> <li>• In a 5/6 bedroom dwelling, 2 parking spaces is insufficient</li> <li>• Garages on new builds are frequently inadequate and converted into habitable rooms</li> <li>• Rochford Parish Council support Options A and B</li> </ul>	<p>The Council has adopted Essex County Council parking standards. The Council will work with Essex County Council to consider whether the existing parking standards remain fit for purpose or whether there is justification to introduce new or revised parking standards. Any new or revised parking standards will need to consider implications on viability and possible exemptions, e.g. where the development site is well-served by public transport or public car parks.</p> <p>All other comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>

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<p style="text-align: center;"><b>Homes Businesses</b></p> <p style="text-align: center;">(Paras 11.58 to 11.61)</p>	<ul style="list-style-type: none"> <li>• Home businesses could cause parking issues but it also reduces out-commuting. Noise and pollution need to be considered</li> <li>• Rayleigh Town Council support Option A</li> <li>• Rochford Parish Council support Option C</li> </ul>	<p>Comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p style="text-align: center;"><b>Alterations to Existing Business Premises</b></p> <p style="text-align: center;">(Paras 11.62 to 11.65)</p>	<ul style="list-style-type: none"> <li>• Rayleigh Town Council support Option A</li> <li>• Rochford Parish Council support Option B</li> </ul>	<p>Support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p style="text-align: center;"><b>Advertising and Signage</b></p> <p style="text-align: center;">(Paras 11.66 to 11.72)</p>	<ul style="list-style-type: none"> <li>• Hawkwell Parish Council would support Option A but feel it should be strengthened. Advertising boards on sides of houses, grass verges and on pavement are unsightly and obstructive</li> <li>• Rayleigh Town Council support Options A and B</li> <li>• Rochford Parish Council support Option A although it would like to see this policy strengthened especially in relation to advertising on residential properties</li> </ul>	<p>Comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p style="text-align: center;"><b>Light Pollution</b></p> <p style="text-align: center;">(Paras 11.73 to 11.76)</p>	<ul style="list-style-type: none"> <li>• Rochford Parish Council support Option B</li> </ul>	<p>Support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>

<p><b>Contaminated Land</b> (Paras 11.77 to 11.81)</p>	<ul style="list-style-type: none"> <li>• Questions raised over potential contamination at an allocated employment and Gypsy and Traveller site, Michelins Farm</li> <li>• Rayleigh Town Council support Option A</li> <li>• Rochford Parish Council support Option A</li> </ul>	<p>Michelins Farm may have outstanding contamination issues which would need to be resolved as part of any future re-development. It would be incumbent on any developer to demonstrate how such contamination would be remediated as part of any planning application.</p>
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## 8 Summary of Representations made by Community Associations and Local Action Groups

8.1 The table below provides a summary of the representations received from community associations and local action groups, including an initial response to the main issues raised.

8.2 The community associations and local action groups from which consultation responses were received are the following:

- Action Groups Resisting Over-Development (AGRO)
- Great Wakering Independent Action Group
- Hullbridge Residents Association
- Rayleigh Action Group

Element	Main issues raised	Initial response
<p><b>Why do we need a new Local Plan?</b> (Paras. 1.1 to 1.3)</p>	<ul style="list-style-type: none"> <li>• Concerns over quality of consultation and transparency</li> </ul>	<p>The Council has and will continue to engage with all stakeholders throughout the preparation of the new Local Plan, in line with its adopted Statement of Community Involvement (SCI) and regulatory requirements. The preparation of this Feedback Report is intended to make clear how the comments received will be used to shape and inform the new Local Plan as it develops. Full information on how the Council engaged with local communities is set out in Chapter 3 of this Feedback Report. The Council will consider how it could improve future consultations and will make changes to, or broaden, its future consultation techniques where considered appropriate.</p>
<p><b>What is the Issues and</b></p>	<ul style="list-style-type: none"> <li>• RDC should engage with the Hullbridge Residents Association as the new Local Plan develops</li> </ul>	<p>The Council has and will continue to engage with all stakeholders throughout the preparation of the</p>

<p><b>Options Document?</b> (Paras. 1.4 to 1.7)</p>		<p>new Local Plan, in line with its Statement of Community Involvement (SCI).</p>
<p><b>How have you assessed the sustainability impacts?</b> (Paras. 1.8 to 1.11)</p>	<ul style="list-style-type: none"> <li>• Concern over the sustainability of sites included in the 2017 SHELAA</li> <li>• Developments should not be approved without consideration for the infrastructure, including drainage and the road network</li> <li>• Concerns that stakeholders were not given opportunities to engage with the draft Sustainability Appraisal Scoping Report</li> </ul>	<p>The 2017 SHELAA formed a broad assessment of the suitability, availability and achievability of a range of sites that were submitted to the Council through a Call for Sites process. The sites contained within the SHELAA include a mix of sustainable and non-sustainable sites. However, inclusion of a site within the SHELAA does not indicate that the Council considers it a sustainable site for development.</p> <p>The Council will continue to work with all infrastructure providers, including Anglian Water and Essex County Council, to ensure that any proposals are sustainable in the context of infrastructure. Where necessary, the new Local Plan will help to deliver the necessary capacity improvements to make that proposal sustainable.</p> <p>The Sustainability Appraisal Scoping Report was subject to a focussed consultation, however it should be noted that a draft Sustainability Appraisal accompanied the Issues and Options document and public comments were invited at that stage.</p>

<p><b>How have you worked with key partners?</b> (Paras. 1.14 to 1.15)</p>	<ul style="list-style-type: none"> <li>Concerns that provisions of the Localism Act have not been properly considered</li> <li>Commitment to co-operation is contradicted by previous disagreements with partners such as over Southend Airport</li> </ul>	<p>The Council has and will continue to follow the provisions of the Localism Act in engaging with communities and fulfilling its Duty to Co-operate with other local authorities. More information on how the Council engaged with communities as part of this consultation is set out in Chapter 3.</p> <p>The Council has a good relationship with stakeholders concerning Southend Airport, including the airport itself and Southend Council. The Council sits on various consultative groups with regards to the operations of the airport, and jointly prepared the London Southend Airport and Environs Joint Area Action Plan (JAAP) with Southend Council to guide the growth of the airport and its environs.</p>
<p><b>How can local communities get involved?</b> (Paras. 1.16 to 1.19)</p>	<ul style="list-style-type: none"> <li>Only one workshop held in Hullbridge and not followed up</li> <li>Costs of preparing a neighbourhood plan are prohibitive</li> <li>Previous interest expressed by Hullbridge Residents Association on preparing a neighbourhood plan was rejected despite the Parish Council being unwilling to prepare one themselves</li> </ul>	<p>The programme of engagement, including the location of drop-in sessions, was agreed in advance of the consultation by the Council and accorded with the Council's adopted Statement of Community Involvement (SCI). Where justified and effective, the Council will consider holding events in more locations as part of future consultations.</p> <p>Neighbourhood plans are community-led and would not be instigated by the Council, although the Council is required to provide support and advice. Organisations such as the Rural Community Council for Essex (RCCE) offer resources to support neighbourhood planning</p>



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		<p>groups across Essex<sup>2</sup>. Any queries relating to neighbourhood planning can also be passed to Officers for consideration.</p> <p>The Town and Country Planning Act 1990, as amended by the Localism Act 2011, states that alternative organisations can only be designated for a neighbourhood plan area if that area does not consist of the area of a Parish Council. As a result, Hullbridge Parish Council is, based on current legislation, the sole organisation able to prepare a neighbourhood plan on behalf of Hullbridge Parish.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>How will the plan be evidenced?</b> (Paras. 1.20 to 1.21)</p>	<ul style="list-style-type: none"> <li>• Concerns that RDC has insufficient funding and resources to support the new Local Plan with robust, up-to-date information</li> <li>• Concerns that Section 106 and CIL contributions will fall below expectations and Government funding will prove a shortfall</li> <li>• Objections to preparing an Infrastructure Delivery Plan and CIL as these would be an extra burden on communities</li> </ul>	<p>The Council has commissioned a considerable amount of joint evidence with other local authorities across Essex, including as part of the South Essex Joint Strategic Plan, to make best use of funding and resources. Additional funding can be secured through schemes such as the Planning Delivery Fund to help support the preparation of Local Plans.</p> <p>The purpose of an Infrastructure Delivery Plan (IDP) is to identify the infrastructure needed to support development. The purpose of an IDP and CIL are not to create an extra burden on</p>

<sup>2</sup> [https://www.essexrcc.org.uk/Our\\_work\\_with\\_Communities/Community\\_Led\\_Planning/Information\\_packs/Neighbourhood\\_Planning\\_Guide.aspx](https://www.essexrcc.org.uk/Our_work_with_Communities/Community_Led_Planning/Information_packs/Neighbourhood_Planning_Guide.aspx)

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		<p>communities but to secure funding from developments to help provide necessary infrastructure. More information on CIL is available on the Planning Portal website<sup>3</sup>.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Tell Us Your Views</b> (Paras. 2.1 to 2.5)</p>	<ul style="list-style-type: none"> <li>• There should be cohesive engagement with Hullbridge Residents Association on the delivery of the new Local Plan</li> </ul>	<p>The Council has and will continue to engage with all stakeholders throughout the preparation of the new Local Plan, in accordance with its adopted Statement of Community Involvement (SCI)</p>
<p><b>Our Economy</b> (Paras. 3.3 to 3.12)</p>	<ul style="list-style-type: none"> <li>• Travel patterns will have changed since 2011 with the increase in population</li> <li>• Employment statistics used are potentially out of date given they are from 2011</li> <li>• Prospective developers should employ local skilled people</li> </ul>	<p>Whilst the Council can encourage developers to employ local people, it has limited powers to require this, and introducing a specific enforceable policy would be beyond the remit of the new Local Plan.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Our Environment</b> (Paras. 3.13 to 3.18)</p>	<ul style="list-style-type: none"> <li>• Flood risk is a major concern in Hullbridge due to lack of improved drainage facilities</li> <li>• Further land being developed may exacerbate this issue over the next 20 years</li> </ul>	<p>In accordance with national policy, the Council will continue to consider flood risk from all sources as the new Local Plan develops. This will include considering the capacity of drainage networks to support proposed growth and developments. Water companies have further powers under the Water Industry Act to require developers to pay for</p>

<sup>3</sup> <http://www.planningportal.co.uk>

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	<ul style="list-style-type: none"> <li>• Full upgrade of the drainage system is well overdue</li> </ul>	<p>provision of water services. To support these considerations, a new Strategic Flood Risk Assessment (SFRA) was prepared in July 2018 which provides an up-to-date source of evidence on flood risk from all sources across Rochford District. This SFRA is available to read on the Council's website and will be used to inform future drafts of the new Local Plan.</p>
<p style="text-align: center;"><b>Our Communities</b> (Paras. 3.19 to 3.25)</p>	<ul style="list-style-type: none"> <li>• Proposed population growth is much greater than previous trends</li> <li>• Population data not up-to-date given it is from 2011</li> <li>• Concerns that Hullbridge will lose its village status if more development goes ahead</li> <li>• Proposed development would overdevelop Hullbridge contrary to the original Core Strategy and the NPPF</li> <li>• Return to Council housebuilding will be necessary</li> </ul>	<p>Population data has used the most up to date data available from the 2011 national Census. Whilst population estimates are available, these are less accurate and are subject to change.</p> <p>Other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p style="text-align: center;"><b>Our Vision and Strategic Objectives</b> (Paras. 5.1 to 5.3)</p>	<ul style="list-style-type: none"> <li>• Previous input in the case of the Hullbridge development unsuccessful and concerns over lack of response</li> <li>• RDC should commit to meaningful consultation with community representatives</li> </ul>	<p>The Council has and will continue to engage with all stakeholders throughout the preparation of the new Local Plan, in line with its Statement of Community Involvement (SCI)</p>
<p style="text-align: center;"><b>Our Current Vision</b> (Para. 5.4)</p>	<ul style="list-style-type: none"> <li>• Concerns that the new Local Plan will not allow the community to have the best quality of life</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>

<p><b>Drafting our Strategic Objectives</b> (Para. 5.11)</p>	<ul style="list-style-type: none"> <li>• Green infrastructure network has not been enhanced to support population</li> <li>• Concerns that the homes, jobs, retail, leisure and other developments that form part of the objectives are not for the benefit of the indigenous population</li> <li>• Concerns that flood protections are undermined by finances</li> <li>• Concerns over climate change and the impact it will have on flood risk, particularly to residents of Hullbridge</li> </ul>	<p>The new Local Plan will centre on a vision and objectives which aim to secure benefit for the District’s existing and future residents and businesses.</p> <p>Please refer to sections on ‘Water Management and Flood Risk’ for a full response on how the Council is planning for flooding issues.</p>
<p><b>Need for Market, Affordable and Specialist Homes</b> (Paras. 6.5 to 6.33)</p>	<ul style="list-style-type: none"> <li>• Concerns over the scale of growth that would be needed to meet the OAN and the impact this would have on the District</li> <li>• Natural growth of the District can be met by brownfield sites, small infill developments, degraded greenfield, flats over shops and the conversion of properties into larger units</li> <li>• These measures are preferable to loss of Green Belt and farmland</li> <li>• The figures for ‘generic’ growth in our district do not support the kind of mass development envisaged</li> </ul>	<p>The Council is expected to prepare a Local Plan which delivers its identified housing needs in full over a 15 year period. The Government have published a new standard methodology for calculating each authority’s Local Housing Need<sup>4</sup> based on population projections and affordability. Where the Local Plan is unable to meet this Local Housing Need, the reasons why this is the case must be strongly evidenced. The Council is not yet at the stage in its plan-making to understand the scale of housing growth that can be sustainably delivered within the District, however this issue will be considered in great detail as the new Local Plan and South Essex Joint Strategic Plan (JSP) develop. The sustainability of potential options will be a fundamental consideration and will be</p>

<sup>4</sup> <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

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	<ul style="list-style-type: none"> <li>• Concern that developers are using viability arguments to avoid providing affordable housing for local people</li> <li>• Concern that housing completion statistics are out of date</li> <li>• Concerns that affordability is not realistic and that younger residents will have great difficulty in purchasing their own homes</li> </ul>	<p>informed by comments such as these, as well as existing and emerging evidence, and national policy.</p> <p>The Council will consider all potential sources of new housing as part of its housing strategy, including brownfield land, as is required by national policy. National policy is clear that local authorities should only consider Green Belt release if it has been established that all other potential sources of new housing are insufficient to meet identified housing needs.</p> <p>The Council’s affordable housing policy only allows a sub-policy contribution of affordable housing where a viability assessment is submitted by a developer and independently verified. This is in line with national policy.</p>
<p><b>Need for Care Homes</b> (Paras. 6.34 to 6.37)</p>	<ul style="list-style-type: none"> <li>• Support for providing habitation for the elderly and infirm</li> <li>• Plans should include provision for 1 and 2 bedroom bungalows</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Delivering our Need for Homes</b> (Paras. 6.37 to 6.48)</p>	<ul style="list-style-type: none"> <li>• Concern over potential for a Garden Village in the East of the District, including any new road cutting across Green Belt land in the District.</li> <li>• Petition received requesting that Rochford District Council make a Public Statement rejecting the concept of a new Garden Village in the East.</li> </ul>	<p>It should be noted that the Council is not yet at a stage in its plan-making where it is able to make any decisions over the location or scale of future housing allocations. Whilst some options are likely to be more sustainable than others, until the Council has prepared and considered all of its</p>

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	<ul style="list-style-type: none"> <li>• Concerns that the plans would fail to preserve the semi-rural nature of South East Essex and lead to total urbanisation</li> <li>• Concerns that future developments will be built on Green Belt</li> <li>• Increase density will create greater strain and stress on communities and infrastructure</li> <li>• RDC should request funds from the government, through the Housing Infrastructure Fund, to enable existing infrastructure to be brought up to date</li> </ul>	<p>evidence, it cannot rule out any options, including a new ‘garden settlement’ somewhere in the District.</p> <p>There is an expectation that a South Essex Joint Strategic Plan (JSP) will provide the framework for determining the location and extent of housing growth in South Essex over the next 20 years. Whilst the South Essex JSP is still in its infancy, it will be subject to extensive public consultation, beginning in Spring 2019, and will be informed by the preparation of evidence which is still ongoing.</p> <p>Interested parties are highly encouraged to stay up to date with both the new Local Plan and South Essex JSP as they develop, and to respond to consultation opportunities.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Good Mix of Homes</b> (Paras. 6.49 to 6.60)</p>	<ul style="list-style-type: none"> <li>• Concerns over the housing mix being delivered on recent developments</li> </ul>	<p>The Council’s policies seek to secure an appropriate mix of house types on new developments to meet a range of housing needs. In practice, developers will often seek to balance the mix of house types delivered on a site themselves in response to local demand and market forces.</p>
<p><b>Gypsy, Travellers and</b></p>	<ul style="list-style-type: none"> <li>• Concern that public funds would be used to provide such sites</li> </ul>	<p>The Council has commenced work on preparing a Gypsy and Traveller Issues Paper. This Issues Paper will consider the appropriate delivery mechanisms for new sites, including privately</p>

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<p><b>Travelling Showpeople</b> (Paras. 6.61 to 6.78)</p>		<p>delivered sites and the feasibility delivering any public sites. The Council expects to publicly consult on this Gypsy and Traveller Issues Paper in Spring 2019.</p>
<p><b>Meeting Business Needs</b> (Paras. 6.87 to 6.96)</p>	<ul style="list-style-type: none"> <li>• Local communities should be given first options for jobs relating to local developments</li> </ul>	<p>Whilst it is outside of the remit of the planning system to require developers to employ local people, the Council does work, and will continue to work, to upskill the population and act as a source of information to residents on how they can access skills and training opportunities, including in the construction sector.</p>
<p><b>Supporting Commercial Development</b> (Paras. 7.1 to 7.2)</p>	<ul style="list-style-type: none"> <li>• RDC should identify sites for commercial and industrial purposes which can provide jobs for the local populations</li> <li>• Not all residents are able to access larger supermarkets or town centres</li> </ul>	<p>As part of the new Local Plan, the Council will consider whether there is a need to allocate additional land for employment uses, based on up to date evidence including the South Essex Economic Development Needs Assessment (EDNA) 2017.</p>
<p><b>Delivering Infrastructure</b> (Paras. 8.1 to 8.2)</p>	<ul style="list-style-type: none"> <li>• RDC should request funds from the government, through the Housing Infrastructure Fund, to enable existing infrastructure to be brought up to date</li> <li>• Infrastructure needed to support proposed levels of growth cannot be delivered</li> <li>• Concerns that utility networks will not be able to support proposed levels of growth</li> <li>• Infrastructure should be delivered prior to any development</li> </ul>	<p>The purpose of the Housing Infrastructure Fund is to deliver new physical infrastructure and to make more land available for housing. It is not intended to improve existing infrastructure where this is not related to housing growth.</p> <p>The Council intends to prepare an Infrastructure Delivery Plan (IDP) to support its Local Plan. This IDP will set out the infrastructure needed to support proposed growth and proposed delivery and funding mechanisms. The Council also intends to introduce a Community Infrastructure Levy (CIL)</p>

		<p>which will require new developments to make financial contributions to provide and improve local infrastructure. The timescales for the introduction of CIL is set out in the latest Local Development Scheme.</p>
<p><b>Highways Infrastructure</b> (Paras. 8.3 to 8.21)</p>	<ul style="list-style-type: none"> <li>• Concerns over the amount of traffic in the western part of the District, namely London Road, Rawreth Lane and Watery Lane</li> <li>• Traffic arising from proposed growth will be unsustainable on road network</li> <li>• Due to piecemeal nature of developments, traffic improvements have no prospect of delivery</li> <li>• Any substantial upgraded road towards the east of the District which bypass Rayleigh will serve to open up much of the remaining Green Belt to development</li> <li>• ECC have funding shortfalls which mean they are not able to provide major road improvements</li> <li>• Number of unadopted, single lane and unmade roads in the District makes access difficult for emergency services and construction traffic</li> </ul>	<p>The Council will continue to work with Essex County Council as the local highway authority to explore opportunities to improve the local highway network and prioritise investment into issue areas. The Council prepared a Highways Baseline Technical Note in 2017<sup>5</sup>, and intends to undertake further modelling to understand and evaluate the capacity of the District’s road network to support growth as part of the new Local Plan as well as identifying opportunities to provide and fund improvements as part of an Infrastructure Delivery Plan. Existing issue areas and options for improvement identified in these comments will be considered as part of that process.</p>

<sup>5</sup> <https://www.rochford.gov.uk/highways-baseline-technical-note-2017>



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	<ul style="list-style-type: none"> <li>Concerns that a proper Highways Risk Analysis has not been carried out</li> </ul>	
<p style="text-align: center;"><b>Sustainable Travel</b> (Paras. 8.22 to 8.37)</p>	<ul style="list-style-type: none"> <li>Limited opportunities to increase train capacity on the Greater Anglia line. Trains are already overcrowded</li> <li>Bus transport is irregular and not always available</li> <li>Terrain and distances preclude the use of cycles for most</li> <li>Most residents are unable to walk for most of their daily requirements</li> <li>Families using cars are a fact of life</li> <li>A Transport Impact Assessment should be carried out prior to any development and construction vehicles should not be allowed to use side roads</li> </ul>	<p>Whilst capacity on the railway networks is generally beyond the remit of the planning system, it is noted that local operators, including Greater Anglia<sup>6</sup>, have their own plans to improve reliability and capacity.</p> <p>The Council will continue to work with Essex County Council to deliver opportunities to improve sustainable transport options in the District, including public transport, walking and cycling. As part of the new Local Plan, the Council will explore opportunities to deliver improvements to cycle networks and public transport routes, including as part of new developments. Existing issue areas and options for improvement identified in these comments will be considered as part of that process.</p>
<p style="text-align: center;"><b>Water and Flood Risk Management</b> (Paras. 8.45 to 8.58)</p>	<ul style="list-style-type: none"> <li>Concern over lack of measures to tackle flood risk for riverside communities</li> <li>Extreme weather is becoming the norm and piecemeal flood alleviation measures are unsustainable</li> <li>Flooding to Watery Lane and the impact on the whole local traffic network should be considered</li> </ul>	<p>A new Strategic Flood Risk Assessment (SFRA) was prepared in July 2018 which provides a source of up to date evidence on flood risk across Rochford District. This SFRA is available to read on the Council's website and will be used to inform future drafts of the new Local Plan.</p> <p>The Council will also work with Essex County Council on any update to the Surface Water</p>

<sup>6</sup> <https://www.greateranglia.co.uk/newtrains>

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	<ul style="list-style-type: none"> <li>• Drainage insufficient to deal with excess flood water</li> </ul>	<p>Management Plan (SWMPs) and to take account of changes to Critical Drainage Areas (CDAs). The Council also intends to undertake a joint update to the Water Cycle Study with other local authorities across South Essex.</p> <p>The Council will continue to work with Essex County Council and the Environment Agency to ensure the new Local Plan takes flood risk from all sources into account and appropriately mitigates any potential impacts.</p>
<p><b>Renewable Energy Generation</b> (Paras. 8.59 to 8.66)</p>	<ul style="list-style-type: none"> <li>• Concerns that aspirations are incompatible with financial constraints</li> </ul>	<p>The financial feasibility of policies will be tested through a Viability Assessment of the Local Plan. Policies will not be included where they would make the Local Plan unviable.</p>
<p><b>Planning Obligations and Standard Charges</b> (Paras. 8.67 to 8.75)</p>	<ul style="list-style-type: none"> <li>• Communities should be consulted on standards</li> </ul>	<p>The Council will continue to consult communities at every stage of its new Local Plan, in accordance with its adopted Statement of Community Involvement (SCI). For detailed information on each stage of the new Local Plan, please refer to the Council’s adopted Local Development Scheme (LDS)<sup>7</sup>.</p>
<p><b>Supporting Health,</b></p>	<ul style="list-style-type: none"> <li>• Concern that local practices did not have any advance information about the Malyons Lane development</li> </ul>	<p>The Council has and will continue to work with the NHS to ensure that the new Local Plan is sustainably supported by healthcare facilities. This will include helping to fund and deliver any capacity</p>

<sup>7</sup> [https://www.rochford.gov.uk/sites/default/files/planning\\_LocalDevelopmentScheme2018.pdf](https://www.rochford.gov.uk/sites/default/files/planning_LocalDevelopmentScheme2018.pdf)

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<p><b>Community and Culture</b> (Paras. 9.1 to 9.2)</p>	<ul style="list-style-type: none"> <li>• Concerns that developer contributions towards healthcare services are inadequate</li> <li>• Concerns that civic amenities are being closed down despite proposed levels of growth</li> </ul>	<p>improvements needed to support new developments.</p> <p>The value of any developer contributions is informed by NHS calculations of existing capacity and projected patient numbers arising from a new development. It is not common practice for the Council to liaise with practices directly, and instead liaison is generally made with the Rochford and Castle Point Clinical Commissioning Group, and NHS England.</p>
<p><b>Health and Well-being</b> (Paras. 9.3 to 9.11)</p>	<ul style="list-style-type: none"> <li>• Residents have difficulty accessing their doctors in a timely manner</li> <li>• Concern over lack of proposals to increase capacity in the health service</li> </ul>	<p>The Council has and will continue to work with the NHS to ensure that the new Local Plan is sustainably supported by healthcare facilities. This will include helping to fund and deliver any capacity improvements needed to support new developments.</p> <p>Existing capacity issues, including wider funding problems, are beyond the remit of the new Local Plan.</p>
<p><b>Education and Skills</b> (Paras. 9.16 to 9.29)</p>	<ul style="list-style-type: none"> <li>• Concern over primary schools in Rayleigh being potential oversubscribed</li> <li>• Concern that developers are using viability to not have to provide necessary schools</li> <li>• Concern over whether planned primary schools at Hall Road and North of London Road will be provided</li> </ul>	<p>The Council will work with ECC to ensure that the new Local Plan is sustainably supported by education facilities. This will include helping to fund and deliver capacity improvements needed to support new developments. Existing capacity issues, including wider funding problems, are beyond the remit of the new Local Plan.</p> <p>In the case of Hall Road and North of London Road, the planning permissions and accompanying</p>

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		legal agreements require the provision of a primary school. These schools would only not be provided in the event that Essex County Council determine there is no longer a need for a new school, i.e. that the pupil numbers could be accommodated elsewhere.
<p align="center"><b>Green Belt</b> (Paras. 10.5 to 10.16)</p>	<ul style="list-style-type: none"> <li>• There is no possibility of delivering the number of dwellings proposed without using Green Belt land which is contrary to the NPPF</li> </ul>	The Council has and will continue to fully consider all potential options for meeting the district’s need within the existing urban area, as is the approach required by national policy, before considering the Green Belt.
<p align="center"><b>Air Quality</b> (Paras. 10.64 to 10.72)</p>	<ul style="list-style-type: none"> <li>• Rayleigh Town Centre has dismal air quality damaging residents’ health and being linked to dementia</li> <li>• Increasing traffic levels will exacerbate the existing problem</li> </ul>	<p>An Air Quality Management Area (AQMA) has been designated in Rayleigh Town Centre, and an Air Quality Action Plan (AQAP) produced to improve air quality back to acceptable levels.</p> <p>The issue of air quality will be considered in detail as the new Local Plan develops to ensure proposals avoid and mitigate any potential impacts on air quality.</p>
<p align="center"><b>Mix of Affordable Homes</b> (Paras. 11.2 to 11.5)</p>	<ul style="list-style-type: none"> <li>• Some elements of Core Strategy are out of date including on affordable housing</li> </ul>	The Council is preparing its new Local Plan to take into account changes to national policy and evidence. Where a Core Strategy policy has become out of date, the new Local Plan will seek to take a different approach to take into account an up-to-date reflection of needs and aspirations. This will include the Council’s approach to affordable

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		housing if this is considered to have become out of date.
<p><b>Development of Previously Developed Land in the Green Belt</b> (Paras. 11.45 to 11.49)</p>	<ul style="list-style-type: none"> <li>Brownfield sites should be used first in preference to Green Belt development</li> </ul>	<p>The NPPF is clear that previously developed sites (i.e. brownfield) should be considered suitable for development, provided they are sustainably located. The Council will only consider releasing Green Belt for development where other sources of housing supply are insufficient to meet identified housing needs.</p>
<p><b>Contaminated Land</b> (Paras. 11.77 to 11.81)</p>	<ul style="list-style-type: none"> <li>All sites should be assessed for flood, contamination and environment issues with an accompanying action plan</li> </ul>	<p>Sites which have identified or potential contamination issues are screened for contamination, and where needed, remediation will be required as part of the site's development.</p>

## 9 Summary of Representations made by Neighbouring Authorities

9.1 The table below provides a summary of the representations received from neighbouring authorities, as well as an initial response to the main issues raised.

9.2 The neighbouring authorities from which consultation responses were received are the following:

- Basildon Borough Council
- Brentwood Borough Council
- Castle Point Borough Council
- Essex County Council
- Maldon District Council
- Southend-on-Sea Borough Council
- Thurrock Council

Element	Main issues raised	Initial response
<p><b>How have you assessed the sustainability impacts?</b></p> <p>(Paras. 1.8 to 1.11)</p>	<ul style="list-style-type: none"> <li>• ECC consider the Sustainability Appraisal to be a good example but, options around housing numbers should be expanded upon in future drafts</li> <li>• SA refers to ‘combination of options’ but attention should be given to what form a combined policy would take</li> </ul>	<p>Comments noted. These points have been passed to the consultant preparing the Council’s Sustainability Appraisal to be considered when preparing future drafts.</p>
<p><b>How have you worked with key partners?</b></p> <p>(Paras 1.14 to 1.15)</p>	<ul style="list-style-type: none"> <li>• SBC welcome acknowledgement of working in partnership and the role that ASELA will play in providing a framework for local plans in South Essex</li> </ul>	<p>The Council will continue to work with neighbouring authorities across South Essex, as part of ASELA, to explore and support opportunities for cross-boundary planning, including the preparation of the South Essex Joint Strategic Plan (JSP).</p>

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<p><b>Our Economy</b> (Paras. 3.3 to 3.12)</p>	<ul style="list-style-type: none"> <li>• Reference should be made to the wider rail network, including Crossrail</li> <li>• Mode of transports used to make journeys should be presented</li> <li>• Opportunity to promote the benefits / outcomes for the local economy arising from improvements to transport network</li> <li>• Reference should be made to the Outer Thames Estuary SPA list of European Sites</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Our Communities</b> (Paras 3.19 to 3.25)</p>	<ul style="list-style-type: none"> <li>• Early Years and Childcare, and Special Education Needs should be included at Paragraph 3.23 and Strategic Priorities 4.3 and 4.4</li> <li>• Greater recognition should be given to the role and contribution of passenger transport</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Our Spatial Challenges</b> (Paras. 4.1 to 4.18)</p>	<ul style="list-style-type: none"> <li>• Should include wider ‘County context’, reflecting two tier context and delivery of ECC functions</li> <li>• Consideration should be given to authorities outside of South Essex such as Maldon</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>National Picture</b> (Paras 4.1 to 4.7)</p>	<ul style="list-style-type: none"> <li>• RDC should work closely with SBC to ensure the delivery of employment sites to meet future needs in both Rochford and Southend</li> <li>• Proposals for infrastructure should be developed in partnership with neighbouring authorities, particularly SBC</li> </ul>	<p>The Council will continue to work with the other constituent authorities of ASELA to explore opportunities for cross-boundary planning in South Essex, including through commissioning joint evidence and the preparation of the South Essex Joint Strategic Plan (JSP). This will include on the</p>

		<p>delivery of strategic employment opportunities and key infrastructure.</p>
<p><b>South Essex Picture</b> (Paras. 4.8 to 4.18)</p>	<ul style="list-style-type: none"> <li>• Several neighbouring authorities draw attention to the joint-working underway in South Essex including the formation of ASELA</li> <li>• RDC should maintain its full, active and on-going engagement in South Essex as part of its duty to co-operate</li> <li>• Expectation and support for the development of a Joint Strategic Plan to help set strategic growth objectives for South Essex and provide a mechanism for delivery</li> <li>• There is shared support for the ways in which local authorities across South Essex have been working together to maximise the effectiveness of plan-making in the context of strategic issues</li> <li>• Basildon Council is satisfied with the degree of engagement with regard to the new Local Plan and support further joint-working moving forward, including through the preparation of joint evidence</li> <li>• Given the constrained nature of Southend Borough, and numerous shared assets, joint working between the authorities will be essential to consider strategic issues, building on the JAAP</li> </ul>	<p>The new Local Plan will reflect the work being undertaken between RDC and its neighbouring authorities under the Duty to Co-operate. RDC is committed to working with its neighbouring authorities on strategic planning issues.</p> <p>Furthermore, the Council will continue to work with the other constituent authorities of ASELA to explore opportunities for cross-boundary planning in South Essex, including through commissioning joint evidence and the preparation of the South Essex Joint Strategic Plan (JSP).</p>



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	<ul style="list-style-type: none"> <li>• RDC should consider the level of resource and commitment that it can provide to joint planning arrangements as part of ASELA</li> <li>• ECC acknowledge and supports the production of a new Local Plan by RDC</li> <li>• The PPG makes it clear that two tiered authorities should work closely together to ensure that strategic matters are planned for effectively</li> </ul>	
<p style="text-align: center;"><b>Our Vision and Strategic Objectives</b> (Paras. 5.1 to 5.3)</p>	<ul style="list-style-type: none"> <li>• Maldon District Council support a number of key ideas and themes in Paragraph 5.8, including improving the strategic infrastructure network</li> <li>• SBC welcomes the vision and key themes put forward, particularly the need to support London Southend Airport and the growth and innovation of the Airport Business Park</li> <li>• SBC considers that the key theme of environment should be redrafted to recognise the importance of meeting future development needs</li> </ul>	Comments noted. These points will be considered when preparing future drafts of the new Local Plan.
<p style="text-align: center;"><b>Our Future Vision</b> (Paras. 5.5 to 5.6)</p>	<ul style="list-style-type: none"> <li>• ECC is supportive of the emerging draft vision</li> <li>• ECC welcomes the inclusion and reference to health</li> </ul>	Comments noted. These points will be considered when preparing future drafts of the new Local Plan.
<p style="text-align: center;"><b>Drafting our Strategic Objectives</b></p>	<ul style="list-style-type: none"> <li>• Thurrock Council supports RDC in seeking to deliver housing to meet its OAHN</li> <li>• Strategic Objective 1 should be rewritten as it could infer that housing will only be delivered</li> </ul>	Comments noted. These points will be considered when preparing future drafts of the new Local Plan.

<p>(Para. 5.11)</p>	<p>through Previously Developed Land and then working with neighbours, with no other potential sources</p> <ul style="list-style-type: none"> <li>• Strategic Objectives should refer to and recognise the role of sustainable transport</li> <li>• Strategic Objectives should also include need for new housing and commercial development to have reasonable access to green spaces</li> <li>• ECC recommends amendments to Strategic Objective 12 to the following:                       “To plan for effective waste management by encouraging adherence to the waste hierarchy, working with Essex County Council to make best use of mineral deposits resources and mineral and waste facilities, including safeguarding resources and infrastructure, supporting renewable energy generation and energy efficiency as part of all new homes and commercial premises developed, as well as supporting efficient water use.”</li> <li>• Strategic Objective 13 (plans for coastal change management) should involve other partners of the Essex Coastal Forum</li> <li>• Strategic Objective 15 should include reference to air quality</li> </ul>	
	<ul style="list-style-type: none"> <li>•</li> </ul>	

<p><b>Need for Market, Affordable and Specialist Homes</b></p> <p>(Paras 6.5 to 6.33)</p>	<ul style="list-style-type: none"> <li>• Basildon Council supports RDC’s intention to meet its own housing needs and to work effectively with neighbours to ensure housing need across the South Essex housing market area is addressed</li> <li>• Basildon Council recommends any policy requirement in relation to meeting the housing need of Rochford residents is backed up with justification and evidence</li> <li>• Basildon Borough Local Plan would not meet the full identified housing needs of the Borough; assistance in meeting the outstanding need will be formally sought from other authorities in South Essex, including Rochford</li> <li>• Brentwood Borough Council would support an approach to planning for a slightly higher housing target</li> <li>• It is stated that Brentwood Borough Council is unlikely to be able to accept any unmet housing need from South Essex given its lack of available brownfield land and Green Belt constraints</li> <li>• Castle Point Borough Council consider the approach taken to housing need to be robust and satisfactory</li> <li>• Castle Point Borough Council welcomes RDC’s commitment to taking into account environmental</li> </ul>	<p>The Council will continue to fulfil its Duty to Co-operate with neighbouring authorities in the South Essex Housing Market Area, including in the context of potential unmet housing need arising from these authorities. It is anticipated that the joint planning work surrounding the South Essex JSP will provide a potential vehicle for considering how unmet need can be met across South Essex.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
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	<p>and other constraints as well as its commitment to work with local authorities</p> <ul style="list-style-type: none"> <li>• All options should be considered for housing delivery including a review of Green Belt land</li> <li>• It would seem appropriate to use the threshold of 10 units or 1000 square metres for affordable housing, given its wide adoption by most local authorities</li> <li>• RDC should take into account the expected changes to housing need methodologies, population and household projections along with other evidence of housing need</li> <li>• Thurrock Council supports the approach that the Council is taking to consider the potential capacity of its area to meet its OAHN including Call for Sites, a review of the Green Belt and landscape areas and further scoping of infrastructure requirements</li> <li>• RDC should consider the implications of unmet need arising from other authorities in the housing market area</li> <li>• ECC will support RDC’s desire to meet its housing needs in full by providing the necessary highway assessments to determine impacts and mitigation measures</li> </ul>	
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	<ul style="list-style-type: none"> <li>• The new Local Plan should emphasise the need to provide infrastructure as part of any new housing proposals</li> <li>• ECC welcome consideration given to adult social care and extra care</li> </ul>	
<p><b>Need for Care Homes</b> (Paras 6.34 to 6.36)</p>	<ul style="list-style-type: none"> <li>• When planning for care homes, consideration should be given to ensuring provision is accessible, appropriate and inclusive</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Delivering our Need for Homes</b> (Paras 6.37 to 6.48)</p>	<ul style="list-style-type: none"> <li>• Significant job growth should be prioritised at major centres supported by resident workforce populations and served by public transport</li> <li>• The Environmental Capacity Study 2015 should be scrutinised with the emphasis on sustainable development and a balance of social, economic and environmental considerations</li> <li>• SBC welcome recognition that Green Belt should be reassessed as part of the new Local Plan preparation process</li> <li>• If RDC identifies an insufficiency to meet its own OAHN, it should carefully consider potential options to accommodate the shortfall in housing supply</li> <li>• RDC should continue to review the potential supply of sites from the urban area and other brownfield</li> </ul>	<p>The Council will continue to develop its proposed housing strategy in partnership with its neighbouring authorities across South Essex. It is anticipated that the JSP, which will be supported by key strategic evidence, will provide a framework for the location and extent of new housing growth across South Essex, including Rochford District. As part of this process, land availability, typology and capacity of infrastructure will all be considered in depth.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>

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	<p>sources, including reviewing its density assumptions</p> <ul style="list-style-type: none"> <li>Local Plan should make it clear that new housing developments should make financial contributions towards education and early years and childcare provision</li> <li>The Local Plan should contain clear policies for the full provision, enhancement and funding of infrastructure arising from planned development</li> </ul>	
<p align="center"><b>Good Mix of Homes</b> (Paras 6.49 to 6.60)</p>	<ul style="list-style-type: none"> <li>A density policy advocating 30 dwellings per hectare is overly restrictive with higher densities likely to be sustainable and appropriate in many circumstances, particularly on brownfield land and in sustainable locations</li> <li>Policy approach should be based on evidence and in accordance with the NPPF</li> <li>Option D should not be supported as it is contrary to the NPPF</li> </ul>	<p>The Council will review its density policies through the new Local Plan, including considering whether higher densities may be appropriate on sites that are well-served by sustainable transport options, in accordance with the NPPF.</p> <p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p align="center"><b>Gypsy, Travellers and Travelling Showpeople</b> (Paras 6.61 to 6.78)</p>	<ul style="list-style-type: none"> <li>RDC should carry out further work to assess its Gypsy, Traveller and Travelling Showpeople needs between 2033 and 2037</li> <li>The Rochford Local Plan should be updated to meet Rochford’s full needs for Gypsy, Traveller and Travelling Showpeople</li> <li>Acknowledgement should be made of the fact there may be unmet need for Gypsy, Traveller and</li> </ul>	<p>In collaboration with other South Essex authorities, the Council intends to undertake a review of the Gypsy, Traveller and Travelling Showpeople Accommodation Assessment to assess pitch/plot needs up to 2038. This review will provide an up to date source of evidence for the purposes of planning for Gypsy, Traveller and Travelling Showpeople needs. The Council has commenced work on preparing a Gypsy and Traveller Issues</p>

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	<p>Travelling Showpeople accommodation from other Essex authorities</p> <ul style="list-style-type: none"> <li>• RDC should acknowledge and support development of protocol for addressing unmet need across Essex</li> <li>• Thurrock Council seek clarification from RDC that its needs will be met within its own area; any unmet need from across South Essex will need to be considered fully as part of the Duty to Co-operate</li> <li>• Policy approach should take account of the transit recommendations within the Essex Gypsy and Traveller Accommodation Assessment</li> </ul>	<p>Paper, which will consider how best to meet the current and future needs of Gypsy and Traveller communities. The Council expects this Issues Paper to be open for consultation in Spring 2019.</p> <p>The Council is also supporting the preparation of joint evidence on the provision of transit sites within Essex. The South Essex Joint Strategic Plan (JSP) may also consider the distribution of pitches, if considered necessary.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Houseboats and Liveaboards</b> (Paras 6.79 to 6.86)</p>	<ul style="list-style-type: none"> <li>• Maldon District Council would support amendments to existing policy to avoid detriment to landscapes, ecology and/or biodiversity on the River Crouch</li> <li>• Paragraph 6.83 should be amended to say ‘low water mark’ and not ‘mean high tide’</li> <li>• Further exploration of the infrastructural requirements of houseboats should be undertaken, e.g. toilets for permanent moorings</li> <li>• Policy approach should be based on evidence and in accordance with the NPPF</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>

<p><b>Meeting Business Needs</b> (Paras 6.87 to 6.96)</p>	<ul style="list-style-type: none"> <li>• Castle Point Borough Council welcome the aim of RDC to provide higher level employment, realising the economic potential of London Southend Airport and enhancing skills in the area</li> <li>• Support for improvements to broadband and new grow-on space for local businesses</li> <li>• Support for the promotion of employment growth in Rochford District supported by highway improvements and sustainable transport improvements</li> <li>• The contribution made by green infrastructure should be acknowledged</li> <li>• Opportunities for waste management should be considered alongside any economic strategy, as these facilities are often sited on industrial / employment land</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Need for Jobs</b> (Paras 6.97 to 6.111)</p>	<ul style="list-style-type: none"> <li>• ECC welcomes proposals to ensure the protection and provision of suitable employment land within the District</li> <li>• ECC welcomes and supports the importance of London Southend Airport, the A127 corridor and London-Southend Victoria railway line</li> <li>• The provision of jobs and infrastructure to support economic growth will be essential, and will be explored by ASELA through the Industrial Strategy and JSP</li> </ul>	<p>The Council will continue to work with its neighbouring authorities, as part of ASELA, to explore opportunities for cross-boundary planning in South Essex including on the provision and distribution of employment growth, and opportunities to support economic growth across the region.</p>



<p><b>London Southend Airport</b> (Paras 6.112 to 6.117)</p>	<ul style="list-style-type: none"> <li>• SBC welcomes the recognition of the need to continue to support the growth potential of LSA and supports options C and D</li> <li>• Support for improvements to public transport services and other sustainable modes of travel linking to the airport</li> <li>• Support for the accompanying Airport Business Park and associated highway and cycling improvements</li> <li>• The provisions of the JAAP should be considered in the new Local Plan, including whether policies should be retained or updated</li> </ul>	<p>Comments noted.</p>
<p><b>Supporting Tourism and Rural Diversification</b> (Paras 6.118 to 6.128)</p>	<ul style="list-style-type: none"> <li>• Improvements to rural connectivity should not solely rely on passenger transport services but also other sustainable travel options</li> <li>• Investment in green infrastructure would be appropriate including green links/green ways and enhancements to the Public Rights of Way network</li> <li>• Policy approach should be based on evidence and in accordance with the NPPF</li> <li>• Option B would be supported subject to further exploration of accessibility issues and the potential benefits of the England Coast Path</li> </ul>	<p>The Council is working in partnership with other South Essex authorities to develop comprehensive green and blue infrastructure evidence across the sub-region. Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>

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<p><b>Retail, Leisure and Town Centres</b> (Paras 7.3 to 7.20)</p>	<ul style="list-style-type: none"> <li>• SBC would support a local retail policy in accordance with a sub-regional strategy across South Essex</li> <li>• RDC should review the existence and pattern of A5 (fast food) premises using the FEAT tool, in support of Public Health ambitions</li> <li>• Support for a combination of options, based on evidence and in accordance with the NPPF</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Delivering Infrastructure</b> (Paras 8.1 to 8.2)</p>	<ul style="list-style-type: none"> <li>• ECC agree that infrastructure is critical to supporting sustainable growth</li> <li>• ECC to take a pro-active position to engage with RDC to ensure the delivery of new homes and employment is at the right location and of an appropriate scale to identify and deliver the necessary level of infrastructure investment</li> <li>• ECC seeks clarification on the size of residential sites being considered when compared to large urban extensions / new settlements to help understand and explore potential implications on financial contributions</li> </ul>	<p>RDC will continue to work with Essex County Council and other infrastructure providers to ensure that the new Local Plan is sustainably supported by infrastructure, and that the form, delivery and funding of new infrastructure and improvements to existing infrastructure needed to support the new Local Plan are achievable.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Highways Infrastructure</b> (Paras 8.3 to 8.21)</p>	<ul style="list-style-type: none"> <li>• Basildon Council support proposal to work alongside Essex County Council and Southend Borough council to develop a transport model for the A127</li> <li>• Proposed grade-separated junction at Pound Lane on the A127 should be noted</li> </ul>	<p>The Council will undertake detailed highway modelling in support of its new Local Plan, and will liaise with relevant authorities (including ECC and SBC) in that process. The next draft of the new Local Plan will be informed by updated highways</p>

	<ul style="list-style-type: none"> <li>• Likely that proposed improvements to highway infrastructure will require support and funding from RDC where they would benefit Rochford residents – including Pound Lane/A127</li> <li>• When undertaking transport modelling, RDC should consider its relationship with neighbouring authorities</li> <li>• RDC should ensure collaborative engagement and continual working between neighbouring authorities to ensure strategic transport links can accommodate proposed growth, particularly in the west of Rochford</li> <li>• SBC welcomes recognition of need for highway improvements to support economic growth and would support option A</li> <li>• ECC to work with RDC to enable further transport and highway impact assessments to be undertaken</li> <li>• Overall support for proposals promoting importance and need for improvements to the A127, A130 and A13</li> <li>• Acknowledgement should be given to the role of promoting sustainable travel as an alternative to traditional reliance on road improvements</li> </ul>	<p>evidence and the consultation responses received to this document.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
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<p><b>Sustainable Travel</b> (Paras 8.22 to 8.37)</p>	<ul style="list-style-type: none"> <li>• RDC should ensure that new developments have accessible services and reduce the need to travel by private car</li> <li>• A127 enterprise corridor should be noted as an important employment location in South Essex – enhanced public transport between Rochford and this area should be sought as part of a strategy to improve sustainable travel choices</li> <li>• There are limitations in the extent to which local authorities can influence public transport, however when identifying strategic housing locations, quality of public transport should be considered</li> <li>• RDC should work in partnership to improve sustainable travel facilities, and acknowledge the role of cycling, green infrastructure and walking networks</li> <li>• SBC support Option A and would prefer to see option for taking forward a South Essex Rapid Transport system retained pending further work</li> <li>• Greater emphasis should be given to the role and importance of sustainable travel as part of a wider sustainable growth strategy</li> <li>• RDC should explore innovative ways to deliver demand-led public transport services</li> </ul>	<p>RDC will work with Essex County Council and other infrastructure providers to ensure that the new Local Plan takes account of the need to promote sustainable patterns of travel and that the form, delivery and funding of new infrastructure and improvements to existing infrastructure needed to support the new Local Plan are achievable.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
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<p><b>Communications Infrastructure</b> (Paras 8.38 to 8.44)</p>	<ul style="list-style-type: none"> <li>• ECC recommend upgrading all broadband references to 'ultrafast' to reflect the Government's next broadband programme</li> <li>• Reference should be made to the BT Openreach policy for providing FTTP connections on new developments of 30+ units free of charge</li> <li>• Support for Options A-C</li> <li>• Policy approach should be based on evidence and reflect the needs of both residents and local businesses</li> <li>• Option D would be contrary to the NPPF</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Water and Flood Risk Management</b> (Paras 8.45 to 8.58)</p>	<ul style="list-style-type: none"> <li>• ECC wish to work with RDC to provide points of clarification and ensure up to date evidence is used to underpin the preparation of the Local Plan (with respect to water and flood risk management)</li> <li>• Update to South Essex Surface Water Management Plan underway which will include revisions to the Critical Drainage Areas</li> <li>• Priority should be given to above ground SuDS systems as opposed to the below ground</li> <li>• SuDS systems should be incorporated into new developments to alleviate flooding</li> <li>• Consideration should be given to securing funding from development to contribute towards necessary</li> </ul>	<p>The Council will continue to work with both Essex County Council (as the lead local flood authority) and the Environment Agency (as national flood authority) to ensure that the new Local Plan takes account of the latest and most relevant evidence and best practice on flood risk, and that appropriate flood risk management approaches and techniques, such as SuDS, are appropriately integrated into the Plan.</p> <p>A new Strategic Flood Risk Assessment (SFRA) was prepared in July 2018 which provides a source of up to date evidence on flood risk across Rochford District. This SFRA is available to read on the Council's website and will be used to inform future drafts of the new Local Plan.</p>

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	<p>maintenance and upgrading of defences along the coast</p>	<p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Renewable Energy Generation</b> (Paras 8.59 to 8.66)</p>	<ul style="list-style-type: none"> <li>• Support for delivering a wide network of electric chargers and fast chargers across the District to aid air quality</li> <li>• Policies should promote the provision of charging points for new domestic and commercial developments</li> <li>• Policy approach should be based on evidence and be in accordance with the NPPF</li> <li>• Option C would be contrary to national policy and the Essex Local Transport Plan</li> </ul>	<p>The Council will explore options for the delivery of a charging network through discussions with neighbouring authorities and developers and consideration of best practice.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Planning Obligations and Standard Charges</b> (Paras 8.67 to 8.75)</p>	<ul style="list-style-type: none"> <li>• Attention should be given to the ECC Developers' Guide to Infrastructure Contributions (2016) and the ECC Local and Neighbourhood Planners' Guide to School Organisation (2018)</li> <li>• Policy approach should be based on evidence and be in accordance with the NPPF</li> <li>• Policy should be amended to take into account the latest material considerations and best practice</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Supporting Health, Community and Culture</b></p>	<ul style="list-style-type: none"> <li>• Partnership working to deliver appropriate future health care facilities should continue</li> <li>• SBC would support Options B and D</li> </ul>	<p>The Council will continue to work closely with public bodies including the NHS and Public Health England to ensure that the new Local Plan helps to</p>

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(Paras 9.1 to 9.2)		support and maintain healthcare facilities as appropriate.
<p align="center"><b>Health and Well-being</b> (Paras 9.3 to 9.11)</p>	<ul style="list-style-type: none"> <li>• Support for general approach to ECC's Independent Living Programme for Older People and Adults with Disabilities</li> <li>• Support for a new policy approach that recognises the role that the natural environment and green infrastructure can play on communities' health and well-being</li> <li>• Option C would be contrary to the NPPF</li> </ul>	<p>A Green and Blue Infrastructure Study is being commissioned across South Essex which will consider the role that green spaces play in South Essex and identify opportunities for improvement. It is intended that this study will help to inform local plan-making across South Essex, as well as the South Essex Joint Strategic Plan.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p align="center"><b>Community Facilities</b> (Paras 9.12 to 9.15)</p>	<ul style="list-style-type: none"> <li>• Opportunities for the co-location of services and maximising the use of existing buildings should be encouraged</li> <li>• Recognition should be given to the increasing emphasis being given to the integration of community infrastructure</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p align="center"><b>Education and Skills</b> (Paras 9.16 to 9.29)</p>	<ul style="list-style-type: none"> <li>• ECC recommend a number of updates to reflect ECC's change in policy and standards</li> <li>• References to 'nursery education' should be updated to 'early years and childcare provision'</li> <li>• 'ECC planning school information' should be used</li> </ul>	<p>The Council will continue to work with ECC to ensure that the new Local Plan is sustainably supported by education facilities. This will include helping to fund and deliver capacity improvements needed to support any developments through planning obligations and developer contributions.</p> <p>This will include the preparation of an Infrastructure Delivery Plan to ensure infrastructural</p>

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	<ul style="list-style-type: none"> <li>• ECC will continue to work with RDC to ensure education needs are appropriate and adequately assessed</li> <li>• ECC to undertake assessment of the potential delivery and resource requirements for accommodating anticipated public change through “scenario testing”</li> <li>• ECC to engage with RDC on skills including the need for large scale developments to adopt an Employment and Skills Plan and reference to ECC reports in evidence base</li> </ul>	<p>requirements and funding options are fully considered.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Early Years and Childcare Provision</b> (Paras 9.30 to 9.36)</p>	<ul style="list-style-type: none"> <li>• Up to date ECC evidence should be used when developing EYCC policies</li> <li>• References to ‘nursery education’ should be updated to ‘early years and childcare provision’</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Open Spaces and Outdoor Sports and Recreation</b> (Paras 9.37 to 9.42)</p>	<ul style="list-style-type: none"> <li>• Support for the ongoing preparation of strategic evidence to assess needs for open spaces, sports and recreation, and identifying ways to improve connectivity between green spaces in the region</li> <li>• Consideration should be given to the wider role and value of green space and green infrastructure on health and well-being and biodiversity</li> <li>• Suitable Accessible Natural Greenspaces (SANGs) should be incorporated as part of new residential developments</li> </ul>	<p>The Council, in partnership with local authorities across South Essex, has commissioned an assessment of Playing Pitches and Indoor Facilities across the region. This assessment, once complete, will help to inform the new Local Plan by providing an up to date and robust source of evidence on both the quantity and quality of sports and recreational facilities in the District, and their capacity to support future population growth. Where it is identified that new or improved facilities are required to support this growth, developers will</p>



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		<p>be required to contribute to the funding of these facilities.</p> <p>A Green and Blue Infrastructure Study is being commissioned across South Essex which will consider the role that green spaces play in South Essex and identify opportunities for improvement. It is intended that this study will help to inform local plan-making across South Essex, as well as the South Essex Joint Strategic Plan.</p>
<p><b>Indoor Sports and Leisure Centres</b> (Paras 9.43 to 9.50)</p>	<ul style="list-style-type: none"> <li>• Policy approach should be based on evidence and be in accordance with the NPPF</li> <li>• Option B would be contrary to the NPPF</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Facilities for Young People</b> (Paras 9.51 to 9.56)</p>	<ul style="list-style-type: none"> <li>• Policy approach should take into account latest ECC policies, guidance and evidence</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Play Space Facilities</b> (Paras 9.57 to 9.61)</p>	<ul style="list-style-type: none"> <li>• Policy approach should take into account latest ECC policies, guidance and evidence</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Protecting and Enhancing our Environment</b></p>	<ul style="list-style-type: none"> <li>• Open and productive dialogue encouraged between MDC and RDC relating to the River Crouch and a possible need for speed restrictions</li> </ul>	<p>The Council will continue to work closely with MDC to deal with issues relating to the River Crouch and</p>

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<p>(Paras. 10.1 to 10.4)</p>	<ul style="list-style-type: none"> <li>• ECC will engage with RDC in the site assessment process to ensure new allocations appropriately address the minerals and waste safeguarding requirements within the relevant Minerals and Waste Local Plans</li> <li>• ECC recommends a holistic approach to environmental policies with links to the wider objectives of promoting growth and healthy communities</li> <li>• ECC wishes to explore opportunities and cross benefits further as incorporated within the revised Essex Design Guide</li> <li>• Further consideration and assessment is required on conservation areas, listed buildings and archaeological sites</li> </ul>	<p>Wallasea Island. Many of these issues are likely to fall outside of the remit of the Local Plan, however.</p> <p>The Council will also work with ECC to ensure that the approach taken to the historic and natural environment is appropriate, particularly in the context of planned growth and the need to safeguard minerals and waste areas. With respect to the historic environment, the Council may look to update its evidence base on conservation areas as its new Local Plan develops.</p>
<p style="text-align: center;"><b>Green Belt</b></p> <p>(Paras 10.5 to 10.16)</p>	<ul style="list-style-type: none"> <li>• General support for the principle of protecting the Green Belt</li> <li>• Recognition that Green Belt policy will need to be reviewed as part of Local Plan preparation however this should be done in partnership</li> <li>• Before looking at potential for Green Belt housing release, RDC should review the potential supply of sites from the urban area and other brownfield sources, and review its density assumptions</li> <li>• Support for Option B</li> </ul>	<p>The Council has recently jointly commissioned a Green Belt assessment with Southend-on-Sea Borough Council. This assessment will provide an up to date robust source of evidence on Green Belt quality in accordance with national policy. This evidence will then help to inform the preparation of each Councils' respective Local Plans and the South Essex JSP.</p> <p>The Council will look to identify housing supply from all sources, including reviewing its policy assumptions, as is required by national policy. where necessary, this will include</p>

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	<ul style="list-style-type: none"> <li>Option C would be contrary to the NPPF</li> </ul>	<p>comprehensively assessing whether there is justification to release land from the Green Belt to facilitate housing growth.</p>
<p><b>Biodiversity, Geology and Green Infrastructure</b> (Paras 10.17 to 10.29)</p>	<ul style="list-style-type: none"> <li>There should be a close working relationship between all contributing authorities in the preparation of the Essex Coast Recreational Avoidance and Mitigation Strategy (RAMS)</li> <li>Local green infrastructure should be incorporated into new developments</li> <li>Reference to Local Wildlife Sites should also consider Local Geological Sites</li> <li>Strategic Objective 12 should be modified to make clear how minerals and waste policies apply (S8 and 2 of the respective plans)</li> <li>Support for retaining or amending existing policies</li> <li>Options B and I would be contrary to the NPPF</li> </ul>	<p>The Council remains committed to the Essex Coast RAMS Project. Once adopted, the RAMS project will require developers to contribute to funding mitigation schemes that off-set the harm caused by recreational visits to highly sensitive environmental areas ('Natura 2000' sites). In Rochford District, these highly sensitive areas are the Crouch and Roach Estuaries and Foulness Island.</p> <p>The Council has also commissioned a Local Wildlife Sites review which will be considering both Local Wildlife Sites and Local Geological Sites in detail. This review will help to inform future drafts of the new Local Plan.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Wallasea Island and the RSPB's Wild Coast Project</b> (Paras 10.30 to 10.34)</p>	<ul style="list-style-type: none"> <li>RDC should acknowledge aspirations of the Burnham-on-Crouch neighbourhood plan, including encouraging visitors to travel sustainably between Burnham-on-Crouch and Wallasea Island</li> <li>Policy approach should be based on evidence and be in accordance with the NPPF, including any project-level HRAs and mitigation</li> </ul>	<p>The Council will continue to work closely with MDC to understand the implications and aspirations of local and neighbourhood planning in Maldon District and to explore opportunities of mutual benefit around the River Crouch and Wallasea Island.</p>

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<p><b>Landscape Character</b> (Paras 10.35 to 10.44)</p>	<ul style="list-style-type: none"> <li>• SBC would support the undertaking of a landscape assessment in partnership</li> <li>• Policy approach should be based on evidence and be in accordance with the NPPF</li> </ul>	<p>The Council has recently jointly commissioned a Landscape Character Assessment with Southend-on-Sea Borough Council which will provide an up to date and robust source of evidence on landscape character to support both Councils' respective Local Plans and the South Essex JSP.</p>
<p><b>Protecting and Enhancing Heritage and Culture</b> (Paras 10.45 to 10.52)</p>	<ul style="list-style-type: none"> <li>• Essex Design Guide is being revised and attention should be given to the revised version when published</li> </ul>	<p>The Council is aware of the revised Essex Design Guide and will look to incorporate its guidance where considered appropriate.</p>
<p><b>Good Design and Building Efficiency</b> (Paras 10.53 to 10.63)</p>	<ul style="list-style-type: none"> <li>• Reference to using sustainable minerals in approved developments should be included</li> <li>• Attention should be given to the fact that national policy changes have included the removal of the Code for Sustainable Homes from planning control</li> <li>• The policy approach should be informed by the revised Essex Design Guide and Sport England's Active Design Principles</li> <li>• An appropriate approach to water efficiency should be developed, in accordance with the NPPF</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Air Quality</b> (Paras 10.64 to 10.72)</p>	<ul style="list-style-type: none"> <li>• Reference should be made to the latest national policy advice including the National Air Quality Plan 2017, and its inclusion of the A127 as a possible air quality issue site</li> </ul>	<p>The issue of air quality will be considered in depth in future drafts of the new Local Plan, and the impact of growth on air quality will be a fundamental consideration in identifying a</p>

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	<ul style="list-style-type: none"> <li>• Attention should be given to the use and role of wider sustainable development principles such as green infrastructure as an opportunity to improve air quality</li> <li>• Option D would be contrary to the NPPF</li> </ul>	<p>preferred policy approach. Opportunities to avoid and mitigate areas of poor air quality will be considered in depth, including the role of green infrastructure.</p> <p>A Green and Blue Infrastructure Study is being commissioned across South Essex which will consider the role that green spaces play in South Essex and identify opportunities for improvement. It is intended that this study will help to inform local plan-making across South Essex, as well as the South Essex Joint Strategic Plan.</p>
<p style="text-align: center;"><b>Mix of Affordable Homes</b> (Paras 11.2 to 11.5)</p>	<ul style="list-style-type: none"> <li>• SBC would support Options F and G</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p style="text-align: center;"><b>Development of Previously Developed Land in the Green Belt</b> (Paras 11.45 to 11.49)</p>	<ul style="list-style-type: none"> <li>• Policy approach should be based on evidence and be in accordance with the NPPF</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p style="text-align: center;"><b>Parking Standards and Traffic Management</b></p>	<ul style="list-style-type: none"> <li>• ECC would partially support Option B but the policy should be strengthened to ensure an appropriate level of off-street parking is provided</li> </ul>	<p>The Council will consider, as part of its new Local Plan, whether its existing parking standards are fit for purpose or whether there is justification to introduce new or revised parking standards. Any new or revised parking standards will need to</p>

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<p>(Paras 11.54 to 11.57)</p>		<p>consider implications on viability and possible exemptions, e.g. where the development site is well-served by public transport or public car parks.</p>
<p><b>Homes Businesses</b> (Paras 11.58 to 11.61)</p>	<ul style="list-style-type: none"> <li>• Support for a flexible approach to home businesses, balancing the ambitions set out in the communications infrastructure chapter and need for grow on space</li> <li>• Policy approach should be based on evidence and be in accordance with the NPPF</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>

## 10 Summary of Representations made by Agents / Developers / Landowners

10.1 Representations made by agents, developers and landowners were typically in relation to specific sites or broad locations proposed for development. As a result, they were typically accompanied by supporting documents such as ‘vision’ statements, indicative plans and topic-specific assessments. Whilst these are noted and will be considered as the Council progresses with its new Local Plan, this feedback report does not seek to identify comments made in relation to the suitability, availability or achievability of specific sites or broad locations for development, nor will it provide an initial response to such comments at this stage. The table below therefore only includes a summary of the representations that relate to the broader issues and options that were the specific focus of this consultation. The full representations including supporting documents are available to read on the Council’s consultation portal at [www.rochford.gov.uk/iao](http://www.rochford.gov.uk/iao)

10.2 The agents, developers and landowners from which consultation responses were received are the following:

- Armstrong Rigg Planning (on behalf of Manor Oak Homes)
- Bidwells (on behalf of Essex Housing and Crest Nicholson)
- Claremont Planning Consultancy (on behalf of Southern & Regional Developments Ltd.)
- FirstPlan
- Gladmans Development Ltd.
- GL Hearn Limited
- GVA
- Icenl (on behalf of Cogent Land LLP)
- Indigo Planning (on behalf of Sainsbury’s Supermarkets Limited)
- Pegasus Group (on behalf of Taylor Wimpey)
- Phase 2 Planning Ltd. (on behalf of Countryside Properties)
- Persimmon Homes

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- Quod (on behalf of Equation Properties Limited)
- Sellwood Planning (on behalf of Rydon Homes)
- Strutt and Parker (on behalf of various)
- Whirledge and Nott (on behalf of various)

Element	Main issues raised	Initial response
<p style="text-align: center;"><b>Our Spatial Challenges</b> (Paras. 4.1 to 4.18)</p>	<ul style="list-style-type: none"> <li>• RDC should ensure that it discharges its legal obligations under the Duty to Co-operate, including considering how any unmet need might be met in South Essex</li> </ul>	<p>The new Local Plan will reflect the work being undertaken between RDC and its neighbouring authorities under the Duty to Co-operate, and RDC is committed to working with its neighbouring authorities on strategic planning issues.</p> <p>Furthermore, the Council will continue to work with the other constituent authorities of ASELA to explore opportunities for cross-boundary planning in South Essex, including through commissioning joint evidence and preparing a South Essex Joint Strategic Plan (JSP).</p>
<p style="text-align: center;"><b>Drafting our Vision</b> (Paras. 5.9 to 5.10)</p>	<ul style="list-style-type: none"> <li>• Support for acknowledgement that the new Local Plan must support employment, economic, housing and demographic growth</li> </ul>	<p>Comments noted.</p>
<p style="text-align: center;"><b>Delivering Homes and Jobs</b> (Paras. 6.1 to 6.4)</p>	<ul style="list-style-type: none"> <li>• RDC should acknowledge the role it has to play in facilitating much needed housing growth and</li> </ul>	<p>The Council will continue to prepare its new Local Plan, and support the preparation of a South Essex JSP, in accordance with national policy. This national policy is clear that local authorities should</p>



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	<p>should work with all stakeholders to deliver this housing</p>	<p>seek to meet their identified needs and work with stakeholders in the preparation of Local Plans.</p>
<p><b>Need for Market, Affordable and Specialist Homes</b>  (Paras. 6.5 to 6.33)</p>	<ul style="list-style-type: none"> <li>• RDC should seek to meet or exceed its Objectively Assessed Need for housing</li> <li>• Acknowledgement that past delivery has failed to meet targets and therefore some support for a new housing target that exceeds identified needs</li> <li>• RDC should allocate land for enough housing development to support local and regional employment growth aspirations</li> <li>• RDC should fulfil its Duty to Co-operate and consider its capacity to meet any unmet need arising from neighbouring authorities</li> <li>• The level of affordable housing required through policy should be viability tested to ensure it does not impact on the deliverability of new housing</li> <li>• Strategic Priority 1 is too narrow and does not consider the need to review the District’s Green Belt boundaries to facilitate growth</li> <li>• A policy requiring a proportion of new homes to be set aside for Rochford residents is unlawful and not supported by national policy</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p> <p>In accordance with national policy, the Council will consider its capacity to meet its identified needs in full as the new Local Plan and evidence base develop. Any homes which have not been delivered as expected in the past, i.e. shortfall, have been factored into assessments of future housing need. The Council will also continue to fulfil its Duty to Co-operate with neighbouring authorities in the South Essex Housing Market Area, including in the context of potential unmet housing need arising from these authorities. It is anticipated that the joint planning work surrounding the South Essex JSP will provide a potential vehicle for considering how unmet need can be met across South Essex.</p>
<p><b>Need for Care Homes</b></p>	<ul style="list-style-type: none"> <li>• RDC should recognise increasing importance of providing accommodation for elderly persons</li> </ul>	<p>The South Essex Strategic Market Assessment (SHMA) Addendum 2017 includes an assessment of need for specialist accommodation. The Council intends to update this evidence to take into</p>

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<p>(Paras. 6.34 to 6.36)</p>	<ul style="list-style-type: none"> <li>• RDC should prepare evidence to consider the amount of elderly persons' accommodation needed over the plan period</li> <li>• RDC should work with providers to deliver and safeguard care homes and other elderly persons accommodation</li> </ul>	<p>account the most up-to-date information, which will then be used to inform the approach to care homes and older persons' accommodation in both the new Local Plan and the South Essex JSP. Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p style="text-align: center;"><b>Delivering our Need for Homes</b></p> <p>(Paras. 6.37 to 6.48)</p>	<ul style="list-style-type: none"> <li>• Support for releasing Green Belt to facilitate housing growth</li> <li>• Housing growth should be concentrated in the most sustainable locations, using the settlement hierarchy as a starting point</li> <li>• Support for Options C-E individually or as a mix of these options</li> <li>• RDC should carefully consider whether a new settlement and the necessary infrastructure to support it is deliverable or realistic</li> <li>• Consideration of potential sites for development should be consistent, robust and transparent</li> </ul>	<p>The location and extent of new housing growth will be considered in greater detail as the new Local Plan develops. The sustainability of potential options for housing growth will be a fundamental consideration, and will be informed by comments such as these as well as existing and emerging evidence.</p> <p>There is an expectation that a South Essex Joint Strategic Plan (JSP) will provide the framework for establishing the distribution of growth across South Essex over the next 20 years. Whilst the South Essex JSP is still in its infancy, it will be subject to extensive public consultation, beginning in Spring 2019, and will be informed by the preparation of evidence which is still ongoing.</p>
<p style="text-align: center;"><b>Good Mix of Homes</b></p> <p>(Paras. 6.49 to 6.60)</p>	<ul style="list-style-type: none"> <li>• Support for Options A or B</li> <li>• National housing standards should only be required where there is an evidenced need, in line with national policy.</li> <li>• Requiring developments to meet the national housing standards may have implications on</li> </ul>	<p>National policy is clear that housing standards should only be applied where there is an evidenced need. The impact of requiring housing standards or bungalows on development viability will be a fundamental consideration in the preparation of any relevant policy. A relevant policy will not be introduced if it would make the Council's</p>

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	<p>viability which result in lesser contributions to infrastructure elsewhere</p> <ul style="list-style-type: none"> <li>• A policy requiring bungalows would result in an inefficient use of land and a need for the Council to release much more Green Belt to meet housing needs</li> </ul>	<p>overall housing strategy unviable, and therefore undeliverable.</p>
<p><b>Gypsy, Travellers and Travelling Showpeople</b> (Paras. 6.61 to 6.78)</p>	<ul style="list-style-type: none"> <li>• Support for the continued allocation of Michelins Farm for a mixed use of employment and Gypsy and Traveller accommodation</li> </ul>	<p>Comments noted.</p>
<p><b>Need for Jobs</b> (Paras. 6.97 to 6.111)</p>	<ul style="list-style-type: none"> <li>• Housing growth locations should be supported by employment growth locations that are sustainably located and connected to one another</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Retail, Leisure and Town Centres</b> (Paras. 7.3 to 7.20)</p>	<ul style="list-style-type: none"> <li>• An impact assessment threshold should be set out to ensure that proposals that would impact on town centres are properly considered</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Highways Infrastructure</b> (Paras. 8.3 to 8.21)</p>	<ul style="list-style-type: none"> <li>• Highway improvements should be delivered proportionately to support growth and should be spatially related to housing and employment growth</li> </ul>	<p>The Council will continue to work with Essex County Council as the local highway authority to ensure that the new Local Plan is sustainably supported by highways infrastructure. The new Local Plan will also help to deliver and fund any improvements needed to support new</p>

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	<ul style="list-style-type: none"> <li>The role of highways on air quality should be considered and upgrades supported in strategic locations, particularly in Rayleigh</li> </ul>	development. The Council has and will continue to support upgrades to the strategic road network at key junctions and locations.
<b>Sustainable Travel</b> (Paras. 8.22 to 8.37)	<ul style="list-style-type: none"> <li>Growth should be concentrated in locations well served by public transport</li> </ul>	Comments noted. These points will be considered when preparing future drafts of the new Local Plan.
<b>Renewable Energy Generation</b> (Paras. 8.59 to 8.66)	<ul style="list-style-type: none"> <li>Any policy requiring renewable energy generation should be costed and factored into viability considerations</li> </ul>	Policies contained within the new Local Plan will be subject to an assessment to ensure that they are financially viable. Policies will not be included where they would result in the Council's housing strategy being unviable.
<b>Planning Obligations and Standard Charges</b> (Paras. 8.67 to 8.75)	<ul style="list-style-type: none"> <li>RDC should consider the role that CIL can play in delivering necessary infrastructure</li> <li>RDC should ensure that reliance on Section 106 agreements does not impede growth</li> </ul>	Comments noted. These points will be considered when preparing future drafts of the new Local Plan.
<b>Early Years and Childcare Provision</b> (Paras. 9.30 to 9.36)	<ul style="list-style-type: none"> <li>Options to expand and provide new education and childcare facilities should be considered</li> </ul>	Comments noted. These points will be considered when preparing future drafts of the new Local Plan.

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<p><b>Open Space and Outdoor Sports and Recreation</b> (Paras. 9.37 to 9.42)</p>	<ul style="list-style-type: none"> <li>RDC should update its evidence on open space provision to consider whether any under-utilised open spaces should be made available for development</li> </ul>	<p>As part of the work supporting the South Essex Joint Strategic Plan (JSP), the Council will be commissioning a joint Green and Blue Infrastructure Strategy with the other South Essex local authorities. This Strategy will include consideration of open space provision and its role in meeting the needs of local communities both in the District and across South Essex.</p>
<p><b>Green Belt</b> (Paras. 10.5 to 10.16)</p>	<ul style="list-style-type: none"> <li>Support for Option B</li> <li>RDC should review its Green Belt boundaries to consider whether there is justification to release a proportion of its Green Belt to facilitate housing growth, in line with national policy</li> </ul>	<p>The Council has jointly commissioned a Green Belt assessment with Southend-on-Sea Borough Council. This assessment will provide a robust and up to date source of evidence on the District's Green Belt, including on quality. The NPPF is clear, however, that Green Belt release should only be considered where it has been established that all other sources of housing supply are insufficient to meet identified needs.</p>
<p><b>Good Design and Building Efficiency</b> (Paras. 10.53 to 10.63)</p>	<ul style="list-style-type: none"> <li>Support for Option G</li> <li>RDC should not seek to replicate in its policies any provisions that are already required through building regulations</li> </ul>	<p>Comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Mix of Affordable Homes</b> (Paras. 11.2 to 11.5)</p>	<ul style="list-style-type: none"> <li>RDC should consider the issue of viability when preparing a policy on the mix of affordable homes</li> </ul>	<p>Comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>

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<p><b>Self-Build and Custom-Build Homes</b> (Paras. 11.6 to 11.12)</p>	<ul style="list-style-type: none"> <li>• Support for Option B</li> <li>• Careful consideration should be given to the siting of self/custom-build plots; view that it is unlikely that large allocations are the most appropriate option</li> </ul>	<p>Comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Development of Previously Developed Land in the Green Belt</b> (Paras. 11.45 to 11.49)</p>	<ul style="list-style-type: none"> <li>• RDC should explore opportunities to redevelop previously developed land in the Green Belt to deliver needed housing growth</li> <li>• This should include sites such as nurseries and agricultural sites that do not strictly meet the definition of previously developed land in the NPPF</li> </ul>	<p>The NPPF is clear that previously developed sites in the Green Belt should be considered suitable for development, provided they are sustainably located and their development would have no greater impact on openness. Whilst partially developed sites such as nurseries or farms may technically be less open than other greenfield sites, an approach which sought to treat them as if they were previously developed would not be supported by the NPPF which specifically and deliberately excludes them from its definition.</p>

## 11 Summary of Representations made by Members of the Public and Local Businesses

11.1 The table below provides a summary of the representations received from members of the public and local businesses, as well as an initial response to the main issues raised.

Element	Main issues raised	Initial response
<p><b>Why do we need a new Local Plan?</b> (Paras. 1.1 to 1.3)</p>	<ul style="list-style-type: none"> <li>• Introduction is too verbose and will deter people from reading whole document</li> <li>• Too many specific terms that lead to public confusion, including 'sufficient', 'high quality', 'sustainable' and 'affordable'</li> <li>• Disagreement with statement at Para 1.2 suggesting considerable consultation took place during last plan-making process</li> <li>• Term 'silent' ambiguous at Para 1.3</li> <li>• Public consultation unnecessary until RDC has clearer understanding of what is being proposed</li> <li>• Consultations do not represent public opinion due to lack of response from residents</li> <li>• Online consultation method too complicated with too many questions</li> </ul>	<p>In preparing the Issues and Options Document, the Council sought to balance the need for all consultation material to be both detailed and easy to understand. To help this, the Council produced a non-technical Executive Summary and held drop-in events where the public could ask questions to Officers. The Council is committed to making its documents easy to understand and will strive to resolve any identified comprehension issues in future processes, including expanding its Frequently Asked Questions (FAQ) webpage and providing a glossary of key terms.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>What is the Issues and Options Document?</b></p>	<ul style="list-style-type: none"> <li>• Disappointed with 2013 Statement of Community Involvement and hope that future consultation will be more representative</li> </ul>	<p>Comments noted.</p> <p>Section 106 contributions are calculated in partnership with the relevant infrastructure providers. The role of these contributions is mainly</p>

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<p>(Paras. 1.4 to 1.7)</p>	<ul style="list-style-type: none"> <li>• Additional areas for housing in Great Wakering will put unsustainable strain on infrastructure</li> <li>• Section 106 contributions for local infrastructure are inadequate and do not respond to local concerns</li> <li>• Sites identified for development are random and no consideration has been given to the character of the land</li> </ul>	<p>to off-set the impact of a development and not to resolve existing problems. Concerns over the wider investment schemes of infrastructure providers should be raised with the infrastructure provider.</p>
<p><b>How have you assessed the sustainability impacts?</b> (Paras. 1.8 to 1.11)</p>	<ul style="list-style-type: none"> <li>• Sustainability of the proposals have not been fully considered, or Sustainability Appraisal has not fully or objectively assessed impacts</li> <li>• A new country park for Rayleigh, Hullbridge and Rawreth could be a way of off-setting the impacts of new growth</li> <li>• Sustainability Appraisal should take account of local knowledge</li> </ul>	<p>The draft Sustainability Appraisal (SA) has been prepared by an independent consultancy in accordance with best practice, legislation and policy. It has also been informed by a focussed consultation with statutory consultees. Any comments received relating to the draft SA will be passed on to the consultants for consideration in later drafts.</p> <p>Other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>How have you assessed the environmental impacts?</b> (Paras. 1.12 to 1.13)</p>	<ul style="list-style-type: none"> <li>• RDC should acknowledge that 'environmental quality' is subjective</li> </ul>	<p>Comment noted.</p>



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<p><b>How have you worked with key partners?</b> (Paras 1.14 to 1.15)</p>	<ul style="list-style-type: none"> <li>• Lack of clarity over who the Planning Inspector works for</li> <li>• Reports produced by ECC show a lack of funding for infrastructure, which should be considered</li> <li>• Even with partnership working, there may still be funding shortfalls for key infrastructure</li> </ul>	<p>The Planning Inspectorate is an agency of the Government who decide whether Local Plans are sound, and also decide appeals about planning applications refused by the local planning authority.</p> <p>The Council will work with infrastructure providers to prepare an Infrastructure Delivery Plan (IDP) to consider the potential sources of funding to secure necessary infrastructure improvements.</p>
<p><b>How can local communities get involved?</b> (Paras. 1.16 to 1.19)</p>	<ul style="list-style-type: none"> <li>• Concerns over the quality of previous public consultations and a lack of opportunities for the public to shape proposals</li> <li>• Concerns that previous public consultation responses did not influence the decisions made</li> <li>• The quality of information being provided to help residents understand what is being proposed was insufficient</li> <li>• Public drop-in sessions should be held in more locations including Hullbridge and Great Wakering as many residents have accessibility issues</li> <li>• RDC should use social media more to connect with the community</li> </ul>	<p>The Council aims to give local communities the best opportunities to make their views known on local planning matters, in line with its adopted Statement of Community Involvement (SCI). Comments about the quality or the general organisation of the consultation will be noted for consideration when preparing for future consultations. Whilst public comments help to inform the Council’s decisions, there are other considerations including national policy and evidence which influence the decisions being made.</p>
<p><b>How will the plan be evidenced?</b> (Paras. 1.20 to 1.21)</p>	<ul style="list-style-type: none"> <li>• Concerns that funding sources will be insufficient to provide necessary infrastructure improvements</li> </ul>	<p>The Council will work with infrastructure providers to prepare an Infrastructure Delivery Plan (IDP) to consider the potential sources of funding to secure necessary infrastructure improvements.</p>

<p><b>Tell Us Your Views</b></p>	<ul style="list-style-type: none"> <li>• The online consultation portal was difficult to use</li> <li>• Concerns over the quality and quantity of information being provided to help residents understand what is being proposed</li> <li>• More account should be taken of local knowledge</li> <li>• Concerns over the way in which comments will be taken into account</li> <li>• Green Belt assessment should have been undertaken prior to consultation on the Issues and Options document</li> <li>• Concerns that scale of growth proposed cannot be supported by existing or improved infrastructure</li> </ul>	<p>The Council aims to give local communities the best opportunities to make their views known on local planning matters, in line with its adopted Statement of Community Involvement (SCI). Comments about the quality or the general organisation of the consultation will be noted for consideration when preparing for future consultations. Whilst public comments help to inform the Council’s decisions, there are other considerations including national policy and evidence which influence the decisions being made.</p> <p>The Council intends to undertake several stages of public consultation to support its new Local Plan, and new evidence, including a Green Belt assessment, will inform future consultation drafts. The purpose of the Issues and Options consultation was to form an early idea of the possible issues and options that should be explored.</p>
<p><b>How can I have my say?</b> (Paras. 2.1 to 2.3)</p>	<ul style="list-style-type: none"> <li>• Some respondents expressed concern that the online consultation portal was too complicated and may have put others off responding to the consultation</li> </ul>	<p>Comments about the quality or the general organisation of the consultation will be noted for consideration when preparing for future consultations.</p>
<p><b>How are you engaging with residents and businesses?</b></p>	<ul style="list-style-type: none"> <li>• Residents should be able to share local knowledge and statistics for use in the evidence base</li> </ul>	<p>The Council aims to give local communities the best opportunities to make their views known on local planning matters, in line with its adopted Statement of Community Involvement (SCI). Comments about the quality or the general</p>

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<p>(Para 2.4)</p>	<ul style="list-style-type: none"> <li>• RDC should hold drop-in events in Hullbridge and not rely on an event in Rayleigh</li> <li>• Some residents chose not to respond to the consultation due to difficulties experienced accessing material and responding to the consultation</li> </ul>	<p>organisation of the consultation will be noted for consideration when preparing for future consultations. Whilst public comments help to inform the Council’s decisions, there are other considerations including national policy and evidence which influence the decisions being made.</p> <p>Comments about the quality or the general organisation of the consultation will be noted for consideration when preparing for future consultations.</p>
<p align="center"><b>Our Characteristics</b> (Paras. 3.1 to 3.2)</p>	<ul style="list-style-type: none"> <li>• Concerns that the level of growth proposed will negatively affect the character of local settlements, including Hockley and Great Wakering’s village appeal</li> <li>• High levels of housing growth may result in increased crime rates</li> <li>• Housing growth should be concentrated in locations best supported by local amenities</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p align="center"><b>Our Economy</b> (Paras. 3.3 to 3.12)</p>	<ul style="list-style-type: none"> <li>• Other areas in the country are better served by local transport, and growth should be concentrated there</li> <li>• Lots of residents out-commute to places like London, therefore South Essex should be prioritised for employment growth</li> </ul>	<p>National policy provides a housing need figure for every local authority which is the starting point for the Local Plan’s housing strategy. The spatial distribution of housing nationally is therefore beyond the influence of the Council.</p> <p>The Council’s Economic Strategy will be informed by commuting trends. The South Essex Economic Development Needs Assessment (EDNA)</p>

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	<ul style="list-style-type: none"> <li>• The A127 is at capacity and will again reach capacity despite Fairglen improvements</li> </ul>	<p>considers multiple scenarios for future employment needs in the District and will inform this strategy.</p> <p>The Council will continue to work with Essex County Council to consider opportunities for highway improvements, including opportunities to improve the capacity of the A127.</p>
<p align="center"><b>Our Environment</b> (Paras. 3.13 to 3.18)</p>	<ul style="list-style-type: none"> <li>• Areas of high ecological value should be protected and preserved</li> <li>• Areas at flood risk should not be developed</li> <li>• Areas of high landscape value should not be developed</li> <li>• The proposed level of housing growth is at odds with the need to protect the environment including Green Belt and wildlife sites</li> <li>• The proposed level of housing growth will contribute to worsening traffic issues, including on the A127</li> <li>• Concerns that disproportionate attention is given to preserving heritage assets in different parts of the District, particularly in Hockley</li> <li>• Map shows a stark difference in sustainability between the Eastern settlements and Western settlements of the District</li> <li>• The River Roach dissects the District and constrains connectivity west to east</li> </ul>	<p>The Council will continue to review its evidence base on environmental issues as part of the new Local Plan process, including an updated Strategic Flood Risk Assessment (SFRA), Landscape Character Assessment and Local Wildlife Sites Review. These studies will help to inform the Council's new Local Plan by provide an up to date source of evidence on flooding, landscape and ecology. Development would generally not be permitted in areas of high landscape or ecological value, or areas at high risk of flooding.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>

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<p style="text-align: center;"><b>Our Communities</b></p> <p style="text-align: center;">(Paras. 3.19 to 3.25)</p>	<ul style="list-style-type: none"> <li>• Not every settlement will see an increase in the elderly population, e.g. Hockley has recently seen a spike in its younger population</li> <li>• Affordability issues not only due to shortage in housing supply. Concern over the number of larger homes being built on new developments and previous ‘selling off’ of Council housing.</li> </ul>	<p>Former Council stock was transferred to Rochford housing association, part of Sanctuary Housing Group.</p> <p>Other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p style="text-align: center;"><b>Our Spatial Challenges</b></p>	<ul style="list-style-type: none"> <li>• RDC should not listen to government demands if the government is unwilling to support them through new infrastructure</li> <li>• Relationship between ECC and RDC should be made clearer</li> <li>• Potential impacts of developments in Southend Borough such as at Temple Farm / Southend United football stadium should be fully considered</li> <li>• Consideration should be given to Crossrail and its likely impacts on South Essex</li> <li>• RDC should work with Chelmsford City Council to consider development opportunities at Battlesbridge</li> </ul>	<p>Rochford District Council sits as part of two-tiered authority structure with Essex County Council (ECC). Whilst RDC are responsible for preparing a Local Plan for the area, ECC are responsible in a variety of key areas including roads, education services, libraries, flooding and public transport. RDC is therefore working closely with ECC to ensure that its new Local Plan is sustainable in the context of key infrastructure.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p style="text-align: center;"><b>National Picture</b></p> <p style="text-align: center;">(Paras. 4.1 to 4.7)</p>	<ul style="list-style-type: none"> <li>• Concern over the emphasis on housing and jobs at the expense of infrastructure; infrastructure should enable housing, not vice versa</li> <li>• The scale of growth being required by national policy is too great</li> </ul>	<p>The Council will continue to work with all key infrastructure providers to ensure that the new Local Plan is sustainable in the context of infrastructure. Where necessary, the new Local Plan will help to deliver improvements to infrastructure. In practice, infrastructure</p>

	<ul style="list-style-type: none"> <li>• RDC should take more account of the Hawkwell Parish Plan</li> <li>• The proposals prioritise needs of future residents over the needs of existing residents</li> <li>• RDC should prioritise democracy and views of local residents over impositions of government</li> <li>• The vision should deliver for all and have buy-in from all stakeholders. Sustainability and public benefit should be prioritised over private gain</li> </ul>	<p>improvements are often funded by developer contributions which can only be received once the development has begun. This makes putting any infrastructure in prior to the development difficult.</p> <p>The Council is required by national policy to plan to meet its full housing needs, and if it is unable to, must strongly evidence why this is the case. The capacity, or otherwise, of the District to meet its full housing needs will be explored as the new Local Plan and South Essex Joint Strategic Plan (JSP) develop. If the Council fails to evidence its proposed housing strategy, its new Local Plan (and the South Essex JSP) is likely to be found unsound and its current policies may become out of date. If the Council does not have up-to-date policies, it will have less control over the development that takes place.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>South Essex Picture</b> (Paras. 4.8 to 4.18)</p>	<ul style="list-style-type: none"> <li>• RDC should not look to help other local authorities meet their housing needs if it cannot meet its own needs</li> <li>• Concept of a housing market area should be made clearer</li> <li>• Development should be concentrated near authority boundaries such as near Shoebury</li> </ul>	<p>Rochford sits in a Housing Market Area (HMA) with Basildon, Castle Point, Southend-on-Sea and Thurrock Boroughs. HMAs are areas that have shared characteristics in their housing markets, including the type and average prices of housing. The HMAs are used as a basis for calculating the future housing needs of an area.</p>

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		All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.
<p><b>Our Vision and Strategic Objectives</b> (Paras. 5.1 to 5.3)</p>	<ul style="list-style-type: none"> <li>Concern over number of strategic objectives; some objectives appear to be basic responsibilities as opposed to objectives</li> <li>The vision does not take account of the views and needs of existing residents</li> </ul>	Comments noted. These points will be considered when preparing future drafts of the new Local Plan.
<p><b>Our Current Vision</b> (Para. 5.4)</p>	<ul style="list-style-type: none"> <li>RDC should follow through on ‘putting residents at the heart of everything that we do’ by listening to the views of residents</li> </ul>	Comments noted.
<p><b>What have you told us so far?</b> (Paras. 5.7 to 5.8)</p>	<ul style="list-style-type: none"> <li>Housing growth must be supported by necessary improvements to infrastructure</li> </ul>	The Council will continue to work with infrastructure providers to ensure that the new Local Plan is sustainable in the context of infrastructure. This will include requiring developers to contribute to the funding and delivery of infrastructure improvements to support the growth.
<p><b>Drafting our Vision</b> (Paras. 5.9 to 5.10)</p>	<ul style="list-style-type: none"> <li>Rochford will no longer be a ‘green and pleasant place’ as stated in the vision if proposed level of housing growth goes ahead</li> <li>RDC has not prioritised previously developed land in the past as evidenced by the large number of homes being built on Green Belt sites</li> <li>The vision should prioritise affordable housing</li> </ul>	National planning policy prioritises the use of previously developed land for development but historically this source of housing has been insufficient to meet the District’s full housing needs. This has necessitated the release of a small proportion of the district’s Green Belt to deliver new homes.

		<p>Other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Drafting our Strategic Objectives</b> (Para. 5.11)</p>	<ul style="list-style-type: none"> <li>• Concerns raised that the proposed level of growth would make the Strategic Objectives unachievable</li> <li>• Proposed level of growth would be contrary to Strategic Objective 8 by putting strain on village and neighbourhood centres</li> <li>• Strategic Objective 14 undermined by existing issues at healthcare services, e.g. long waiting times and cancelled appointments</li> <li>• RDC should pursue an ‘infrastructure first’ approach to new housing</li> <li>• Definition of ‘meaningful’ important at Strategic Objective 10</li> <li>• RDC should reduce out-commuting by providing improvements to job opportunities and transport connections in the District</li> <li>• Areas at flood risk need to be protected/improved, including at Hullbridge</li> <li>• Improvements to community facilities are not always needed, e.g. new skate parks</li> <li>• Wildlife is not being adequately protected in new developments, contrary to Strategic Objective 19</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>



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	<ul style="list-style-type: none"> <li>• Strategic Objective 20 is being undermined by the scale of development in villages</li> <li>• RDC should seek to balance all the Strategic Objectives but must consider whether some are mutually exclusive</li> </ul>	
<p style="text-align: center;"><b>Delivering Homes and Jobs</b> (Para. 6.1 to 6.4)</p>	<ul style="list-style-type: none"> <li>• Concerns raised over the impact that building new housing would have on the:             <ul style="list-style-type: none"> <li>i. Character of the District</li> <li>ii. Capacity of infrastructure, including roads, healthcare, community facilities, education, drainage and other utilities</li> <li>iii. Environmental quality, including flood risk, Green Belt, air quality, pollution, biodiversity and landscape</li> </ul> </li> <li>• Proposed level of growth would not be sustainable</li> <li>• Concerns over the likely occupiers of new housing and whether these houses will be occupied by Rochford residents and their children</li> <li>• Other local authorities may be purchasing housing within Rochford to house residents on their housing registers, meaning new housing does not benefit Rochford residents</li> <li>• The emergency services would not be able to manage with the proposed level of growth</li> </ul>	<p>The Council is not yet at the stage in its plan-making where it is able to make any decisions over the spatial distribution of new housing. Whilst some options are likely to be more sustainable than others, until the Council has prepared and considered all of its evidence, it cannot rule out any options. The NPPF is clear that Green Belt release should only be considered where other sources of new housing are insufficient to meet identified housing needs. Housing development would also generally not be permitted in areas with high environmental quality or sensitivity.</p> <p>There is an expectation that a South Essex Joint Strategic Plan (JSP) will provide the framework for determining the spatial distribution of housing growth in South Essex over the next 20 years. Whilst the South Essex JSP is still in its infancy, it will be subject to extensive public consultation, beginning in Spring 2019, and will be informed by the preparation of evidence which is still ongoing.</p> <p>Interested parties are highly encouraged to stay up to date with both the new Local Plan and South</p>

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	<ul style="list-style-type: none"> <li>• RDC should support new specialist housing for elderly people, which will release existing housing for new homeowners</li> <li>• RDC should prioritise the use of brownfield land as opposed to building on Green Belt land</li> <li>• Concerns over the density of new housing and impact even smaller developments have on infrastructure</li> <li>• Concerns over the impact of building new housing on existing house prices</li> <li>• RDC should give greater weight to local knowledge instead of relying on experts</li> <li>• Infrastructure improvements should precede any new growth</li> </ul>	<p>Essex JSP as they develop, and to respond to consultation opportunities.</p> <p>The Council will continue to work with infrastructure providers to ensure that the new Local Plan is sustainable in the context of infrastructure. This will include requiring developers to contribute to the funding and delivery of infrastructure improvements to support the growth.</p> <p>The impact of new housing on house prices is not able to be considered.</p>
<p><b>Need for Market, Affordable and Specialist Homes</b> (Para. 6.5 to 6.33)</p>	<ul style="list-style-type: none"> <li>• General appreciation that some level of new housing needs to be built</li> <li>• RDC should not accept impositions of government where these would have a negative impact on the District</li> <li>• Concerns raised over the impact that building new housing would have on the: <ul style="list-style-type: none"> <li>i. Character of the District</li> </ul> </li> </ul>	<p>The Council is required by national policy to plan to meet its full housing needs, and if it is unable to, must strongly evidence why this is the case. The capacity, or otherwise, of the District to meet its full housing needs will be explored as the new Local Plan and South Essex Joint Strategic Plan (JSP) develop. If the Council fails to evidence its proposed housing strategy, its new Local Plan (and the South Essex JSP) is likely to be found unsound and its current policies may become out of date. If the Council does not have up-to-date policies, it</p>

	<ul style="list-style-type: none"> <li>ii. Capacity of infrastructure, including roads, healthcare, community facilities, education, drainage and other utilities</li> <li>iii. Environmental quality, including flood risk, Green Belt, air quality, pollution, biodiversity and landscape</li> <li>• RDC should prioritise building retirement homes as there is growing demand for this type of accommodation</li> <li>• There are insufficient numbers of affordable or suitable housing being built for first time buyers</li> <li>• House prices have become unaffordable to first time buyers</li> <li>• Concerns over the definition of ‘affordable’ as even affordable housing is unaffordable to many</li> <li>• The Objectively Assessed Need is too high and does not reflect ‘natural population growth’</li> <li>• Other local authorities may be purchasing housing within Rochford to house residents on their housing registers, meaning new housing does not benefit Rochford residents</li> <li>• Concerns over the size of new homes being built which may be too large for first time buyers and older populations</li> </ul>	<p>will have less control over the development that takes place.</p> <p>The Council is not yet at the stage in its plan-making where it is able to make any decisions over the spatial distribution of new housing. Whilst some options are likely to be more sustainable than others, until the Council has prepared and considered all of its evidence, it cannot rule out any options. The NPPF is clear that Green Belt release should only be considered where other sources of new housing are insufficient to meet identified housing needs. Housing development would also generally not be permitted in areas with high environmental quality or sensitivity.</p> <p>There is an expectation that a South Essex Joint Strategic Plan (JSP) will provide the framework for determining the spatial distribution of housing growth in South Essex over the next 20 years. Whilst the South Essex JSP is still in its infancy, it will be subject to extensive public consultation, beginning in Spring 2019, and will be informed by the preparation of evidence which is still ongoing.</p> <p>Interested parties are highly encouraged to stay up to date with both the new Local Plan and South Essex JSP as they develop, and to respond to consultation opportunities.</p> <p>The Council will continue to work with infrastructure providers to ensure that the new</p>
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	<ul style="list-style-type: none"> <li>• A proportion of new homes should be reserved for people with a local connection</li> <li>• Reference made to Environmental Capacity Study 2015 which suggested that the District has limited capacity to accommodate significant growth</li> <li>• RDC should not help to meet the housing needs of other local authorities if it cannot meet its own</li> <li>• Concerns that the District may become a ‘dumping ground’ for new housing from across South Essex</li> <li>• More pressure should be applied to the Government and developers to ensure the proposed level of growth is sustainable</li> <li>• Concerns over the affordability of new homes being built and the impact this is having on the age demographic of the District</li> <li>• Lack of affordability is reflected in growing trend in ‘granny annexes’ and children living in garden units</li> <li>• RDC should continue to require a percentage of new homes to be affordable. Developers should not be able to opt out of affordable housing due to viability on basis of having overpaid for the land</li> <li>• National housing growth should be concentrated in more remote locations such as Scotland and Wales where there is more space</li> </ul>	<p>Local Plan is sustainable in the context of infrastructure. This will include requiring developers to contribute to the funding and delivery of infrastructure improvements to support the growth.</p>
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	<ul style="list-style-type: none"> <li>• Rochford sits on a peninsula and is highly constrained; housing growth should go in neighbouring authorities that are less constrained and have better access to motorways</li> </ul>	
<p style="text-align: center;"><b>Need for Care Homes</b> (Para. 6.34 to 6.36)</p>	<ul style="list-style-type: none"> <li>• RDC should prioritise building new care homes as the elderly population is projected to increase</li> <li>• RDC should safeguard existing care homes to protect them from development</li> <li>• Care should include younger people and not just traditional elderly persons care</li> <li>• Care homes should be located in sustainable locations well-served by public transport, such as in town centres</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p style="text-align: center;"><b>Delivering our Need for Homes</b> (Para. 6.37 to 6.48)</p>	<ul style="list-style-type: none"> <li>• Many concerns raised over sites included in the Strategic Housing and Employment Land Availability Assessment (SHELAA) 2017 and their suitability for future development. In particular, concerns were raised over:             <ul style="list-style-type: none"> <li>○ The use of Green Belt land for development</li> <li>○ The impact of development on flood risk</li> <li>○ The impact of development on traffic congestion, or the quality of access to a site</li> <li>○ The capacity of services and utilities to support development on certain sites</li> </ul> </li> </ul>	<p>The Council is required by national policy to regularly undertake land availability assessments to determine the capacity of land within the District to provide new housing. The sites included in the SHELAA 2017 were in the majority sites where the landowner or an agent had put a site forward as being available for development. However, the vast majority of these sites were found to be unsuitable for development at the current time. A site being included in the SHELAA 2017 does not mean that the Council considers it to be suitable for future development. It merely demonstrates the availability of land.</p>

	<ul style="list-style-type: none"> <li>○ The impact of development on areas of environmental quality</li> <li>● The Green Belt should be protected from new development in line with national policy</li> <li>● RDC should prioritise the use of in-fill and previously developed land to provide housing</li> <li>● RDC should explore opportunities for a new settlement with accompanying infrastructure, either in the east of the District or in the north of the District</li> <li>● Alternatively, development should be concentrated in the most sustainable locations around existing towns, such as Rayleigh, Rochford and Hockley</li> <li>● To meet the proposed level of growth, high capacity infrastructure needs to be provided such as a new road connection across the River Crouch or improvements to the A127</li> <li>● Development should not go ahead without the necessary improvements to infrastructure to make it sustainable</li> <li>● Infrastructure improvements should be provided prior to any development taking place</li> <li>● Development should not go ahead in areas at risk of flooding such as Hullbridge or Great Wakering</li> </ul>	<p>The Council is not yet at the stage in its plan-making where it is able to make any decisions over the spatial distribution of new housing. Whilst some options are likely to be more sustainable than others, until the Council has prepared and considered all of its evidence, it cannot rule out any options in line with Government policy. The NPPF is clear that Green Belt release should only be considered where other sources of new housing supply are insufficient to meet identified housing needs. Housing development would also generally not be permitted in areas with high environmental quality or sensitivity.</p> <p>There is an expectation that a South Essex Joint Strategic Plan (JSP) will provide the framework for determining the spatial distribution of housing growth in South Essex over the next 20 years. Whilst the South Essex JSP is still in its infancy, it will be subject to extensive public consultation, beginning in Spring 2019, and will be informed by the preparation of evidence which is still ongoing.</p> <p>Interested parties are highly encouraged to stay up to date with both the new Local Plan and South Essex JSP as they develop, and to respond to consultations.</p> <p>The Council will continue to work with infrastructure providers to ensure that the new Local Plan is sustainable in the context of infrastructure. This will include requiring</p>
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	<ul style="list-style-type: none"> <li>• Developments should not be sited on prime agricultural land</li> <li>• Concerns over the impact of development options on the capacity of the road network, which is already highly congested in certain locations</li> <li>• Concerns over the capacity of infrastructure and community facilities to meet the additional demand that new housing would create</li> <li>• Concerns over the impact of in-fill or intensification schemes on the character of existing settlements, e.g. large flats would not be appropriate in certain settlements</li> </ul>	<p>developers to contribute to the funding and delivery of infrastructure improvements to support the growth.</p>
<p><b>Good Mix of Homes</b> (Paras. 6.49 to 6.60)</p>	<ul style="list-style-type: none"> <li>• There is a need to build new and protect existing bungalows from extensions to ensure they remain available for both first time buyers and elderly populations</li> <li>• Concerns over the impact of increasing density on the character of new developments and existing settlements</li> <li>• Concerns over the number of larger homes being built which are unaffordable and unsuitable for the majority of the population</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Gypsy, Travellers and Travelling Showpeople</b></p>	<ul style="list-style-type: none"> <li>• Concerns raised about the impact of providing Gypsy, Traveller or Travelling Showpeople sites on settled communities</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>

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<p>(Paras. 6.61 to 6.78)</p>	<ul style="list-style-type: none"> <li>• Support for continued allocation of Michelins Farm to provide such accommodation</li> <li>• RDC should meet the needs of these communities by allocating a sufficient number of sites</li> </ul>	
<p><b>Meeting Business Needs</b> (Paras. 6.87 to 6.96)</p>	<ul style="list-style-type: none"> <li>• Some support for Options B, C and E</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Need for Jobs</b> (Paras. 6.97 to 6.111)</p>	<ul style="list-style-type: none"> <li>• RDC should acknowledge that many residents commute to London and that high skill jobs are unlikely to be replicated in Rochford</li> <li>• Concerns over the principle of re-developing employment sites for housing whilst building new employment sites on Green Belt land to replace them</li> <li>• Support for providing grow-on space for businesses looking to expand</li> <li>• Many of the District’s industrial estates are unsuitable for high-end employment uses</li> <li>• Concerns raised over the capacity of infrastructure including roads to support any growth in job opportunities</li> <li>• More local job opportunities should be provided to reduce the need to commute by car or train</li> </ul>	<p>The NPPF supports the re-development of brownfield land for housing; in practice, brownfield sites are often employment sites that have become vacant or otherwise available for development. Some active sites may also be unsuitable for the types of use that happen there, such as heavy industry close to residential properties. The new Local Plan therefore has to balance the need to build new homes with ensuring that suitably-located employment opportunities are also provided. The South Essex Economic Development Needs Assessment (EDNA) considers multiple scenarios for the future employment needs in the District and will help inform the new Local Plan. This will also acknowledge current and future commuting trends.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>



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	<ul style="list-style-type: none"> <li>• There is a lack of employment opportunities in Hullbridge, despite a large and growing population</li> <li>• Support for protecting existing employment sites from retail or leisure uses</li> <li>• Concerns raised over the effectiveness of Area Action Plans, including plans to re-develop industrial estates for housing</li> </ul>	
<p align="center"><b>London Southend Airport</b></p> <p>(Paras. 6.112 to 6.117)</p>	<ul style="list-style-type: none"> <li>• General support for Options A, B, C and D</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p align="center"><b>Supporting Tourism and Rural Diversification</b></p> <p>(Paras. 6.118 to 6.128)</p>	<ul style="list-style-type: none"> <li>• Support for improving broadband and mobile coverage in rural areas</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p align="center"><b>Supporting Commercial Development</b></p> <p>(Paras. 7.1 to 7.2)</p>	<ul style="list-style-type: none"> <li>• Attention should be given to the impact of free parking in out of centre locations on town centres</li> <li>• Government considered levy on free parking which should be considered</li> <li>• Parking charges should be reviewed as part of town centre improvements</li> </ul>	<p>Parking charges are largely outside of the influence of the Local Plan; however these comments will be forwarded to the relevant team in the Council to consider.</p>

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<p align="center"><b>Retail, Leisure and Town Centres</b></p> <p align="center">(Paras. 7.3 to 7.20)</p>	<ul style="list-style-type: none"> <li>• Support for improving street furniture in town centres</li> <li>• Rayleigh town centre should be considered the aspiration for Rochford and Hockley centres</li> <li>• Concerns raised over recent closures of banks, shops and pubs in town centres</li> <li>• Concerns raised over the impact of more cafes, takeaways and restaurants on character and appearance of town centres</li> <li>• Support for initiatives to bring more life into town centres, such as markets or parking charge reductions</li> </ul>	<p>The Council will seek to develop a policy approach to promote the vitality and viability of town centres within the District, including the type of development and uses that are permitted within each centre. It is noted, however, that certain market factors affecting town centres are beyond the remit of the local planning authority, including commercial decisions made by retailers, banks and pubs based on economic trends and viability.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p align="center"><b>Villages and Local Neighbourhood Centres</b></p> <p align="center">(Paras. 7.21 to 7.27)</p>	<ul style="list-style-type: none"> <li>• Support for protecting village centres, such as in Hullbridge, to ensure residents have access to basic amenities without needing to travel long distances</li> <li>• Improvements to village and neighbourhood centres should be supported to accompany any housing growth in those areas</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p align="center"><b>Delivering Infrastructure</b></p> <p align="center">(Paras. 8.1 to 8.2)</p>	<ul style="list-style-type: none"> <li>• Concerns raised about the capacity of existing infrastructure, including traffic congestion, school place shortages and long waiting times at healthcare facilities.</li> <li>• Concerns raised about the capacity of infrastructure to support proposed levels of growth,</li> </ul>	<p>The Council will continue to work with infrastructure providers to ensure that the new Local Plan is sustainable in the context of infrastructure. This will include requiring developers to contribute to the funding and delivery of infrastructure improvements to support the growth.</p>

	<p>including roads, schools, healthcare facilities, sewerage and other utilities</p> <ul style="list-style-type: none"> <li>• Concerns raised about the ability for improvements to be funded and delivered to make the proposed level of growth sustainable</li> <li>• Concerns over the scale of improvements being provided on existing developments and their adequacy to support the increased population</li> <li>• Essex County Council have identified funding shortfalls to infrastructure improvements and therefore should not be relied on to help fund new infrastructure</li> <li>• Support for improvements to the highway network to alleviate existing and future congestion issues. Existing problem areas identified include: <ul style="list-style-type: none"> <li>○ Ashingdon Road</li> <li>○ A127 (including Rayleigh Weir)</li> <li>○ A129</li> <li>○ Eastwood Road</li> <li>○ High Road/High Street, Rayleigh</li> <li>○ London Road</li> <li>○ Rawreth Lane</li> <li>○ Southend Road/Main Road</li> </ul> </li> </ul>	<p>Infrastructure providers are also required to invest in their services to support existing populations. The role of the new Local Plan is primarily to fund and deliver infrastructure improvements to support proposed developments, and capacity issues with existing infrastructure is largely beyond the influence of the local planning authority.</p>
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	<ul style="list-style-type: none"> <li>○ Watery Lane</li> <li>● Developers should be required to contribute to infrastructure improvements and should not be permitted to renege on legal agreements</li> <li>● Support for the introduction of CIL to fund improvements to infrastructure</li> <li>● Pockets of the District have very poor road infrastructure and increased levels of traffic to these areas may be unsafe</li> <li>● Improvements to infrastructure should be provided prior to any development taking place</li> <li>● Impacts of new infrastructure on air quality and pollution should be considered</li> </ul>	
<p><b>Highways Infrastructure</b> (Paras. 8.3 to 8.21)</p>	<ul style="list-style-type: none"> <li>● Concerns raised over the capacity of the highway network to support proposed level of housing growth. Existing problem areas in the network identified include: <ul style="list-style-type: none"> <li>○ Ashingdon Road</li> <li>○ A127 (including Rayleigh Weir)</li> <li>○ A129 (including Crown Hill)</li> <li>○ Eastwood Road</li> <li>○ High Road/High Street, Rayleigh</li> <li>○ Hullbridge Road</li> </ul> </li> </ul>	<p>The Council will continue to work with Essex County Council as the local highway authority to explore opportunities to improve the local highway network and prioritise investment into issue areas. The Council intends to prepare detailed evidence to understand and evaluate the capacity of the District’s road network to support growth as part of the new Local Plan as well as identifying opportunities to provide and fund improvements as part of an Infrastructure Delivery Plan. Existing issue areas and options for improvement identified in these comments will be considered as part of that process.</p>

	<ul style="list-style-type: none"> <li>○ London Road</li> <li>○ Rawreth Lane</li> <li>○ Southend Road/Main Road (including Spa Roundabout)</li> <li>○ Watery Lane</li> </ul> <ul style="list-style-type: none"> <li>● Highway improvements should be delivered prior to or alongside any development</li> <li>● Concerns over the ability to deliver and fund highway improvements needed to support growth, including by reference to ECC funding shortfalls</li> <li>● Support for considering brand new strategic road infrastructure to support growth, such as a north-south route across the River Crouch or an ‘outer bypass’ between the Rettendon Turnpike and Rochford/Southend</li> <li>● Improvements are needed to alleviate existing traffic issues, not just to support new developments</li> <li>● Relationship between traffic levels and economic growth should be recognised</li> <li>● High levels of on-street parking impacts the flow of traffic and should be tackled through double yellow lines and traffic measures</li> <li>● Support for improvements to pavements which in some locations are not wide enough to support</li> </ul>	<p>Concerns around highway maintenance should be raised to Essex County Council as the local highway authority.</p> <p>Issues relating to on-street parking should be raised to the South Essex Parking Partnership for their consideration.</p>
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	<p>their use by those with pushchairs, wheelchairs or mobility scooters</p> <ul style="list-style-type: none"><li>• Concerns raised over the impact that high levels of car usership have on the character and enjoyment of areas</li><li>• RDC should acknowledge that there are high levels of car ownership in the District and that residents of proposed developments will likely own at least one car</li><li>• Any development should be accompanied by a suitable and safe access</li><li>• Concerns raised over the impact that high levels of car usership have on air quality and pollution, and impact of further growth on air quality</li><li>• Concerns raised over number of potholes and impact that higher levels of usership will have on road condition</li><li>• Reliance on car usership would not be as great if viable public transport/cycling options were available</li><li>• Pockets of the District have very poor road infrastructure and increased levels of traffic to these areas may be unsafe</li><li>• Concerns over the impact that construction traffic will have on congestion and road condition</li></ul>	
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	<ul style="list-style-type: none"> <li>• Dissatisfaction with level of highway improvements delivered in recent years</li> </ul>	
<p><b>Sustainable Travel</b> (Paras. 8.22 to 8.37)</p>	<ul style="list-style-type: none"> <li>• Concerns raised about the capacity of existing rail network, and perceived lack of capacity to increase frequency of rail services to support growth</li> <li>• Concerns raised about the quality and reliability of existing bus and rail services</li> <li>• Concerns raised over the lack of bus connections to more rural locations including Hullbridge, Canewdon and Great Wakering and the impact this has on car usership</li> <li>• Concerns raised about a lack of destinations available by bus and need for onward connections to reach local hospitals and shops</li> <li>• Existing cycle and walking networks are disconnected and unsafe</li> <li>• Much of the population is located too far from facilities and services to make cycling or walking viable</li> <li>• High levels of car usership deter residents from cycling or walking</li> <li>• New developments should be well-served by public transport and be cycle- and walking-friendly</li> </ul>	<p>The Council will continue to work with Essex County Council to deliver opportunities to improve sustainable transport options in the District, including public transport, walking and cycling. As part of the new Local Plan, the Council will explore opportunities to deliver improvements to cycle networks and public transport routes, including as part of new developments. Existing issue areas and options for improvement identified in these comments will be considered as part of that process.</p> <p>The Council will work with public transport providers to consider if there are options to improve sustainable transport connections throughout the District. The operational side of public transport is generally beyond the remit of the local planning authority however and complaints about the quality of service should be raised with the individual operator.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>

	<ul style="list-style-type: none"> <li>• RDC should acknowledge that many people do not wish to cycle or walk as driving is easier and quicker</li> <li>• New developments should provide improvements to cycle and walking networks</li> <li>• RDC should explore opportunities for integrated travel, e.g. a unified ticket system for bus, rail, taxi etc.</li> <li>• Crossrail should be extended to serve Southend Victoria Line</li> <li>• C2C line to Shoeburyness should be extended to Great Wakering</li> <li>• Greater Anglia line should be extended between Battlesbridge and South Woodham Ferrers to serve Hullbridge</li> <li>• Cost of public transport main barrier to use</li> <li>• Doubts raised over whether a modal shift is realistic as car usership has become a “fact of life”</li> <li>• There is a need to improve public footpaths and bridleways as many of these are dangerous</li> <li>• More zebra crossings are needed to allow walkers to cross busy roads safely</li> <li>• On-street parking is a key barrier to cyclists</li> </ul>	
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<p><b>Communications Infrastructure</b> (Paras. 8.38 to 8.44)</p>	<ul style="list-style-type: none"> <li>• Support for improving availability and quality of broadband and mobile networks across the District, particularly in rural areas</li> <li>• Support for rolling out superfast broadband across the District</li> <li>• Availability of broadband in rural areas is a key barrier to rural businesses</li> <li>• Concerns raised about the impact that new growth will have on broadband speeds</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Water and Flood Risk Management</b> (Paras. 8.45 to 8.58)</p>	<ul style="list-style-type: none"> <li>• New developments should not be located in areas at risk of flooding</li> <li>• Concerns raised about the impact that new growth may have on flood risk (from the sea, rivers, streams, groundwater and surface water) to existing communities, particularly in Rawreth, Hullbridge and Great Wakering</li> <li>• Concerns that existing drainage is inadequate to deal with high rainfall and should be improved</li> <li>• Concerns over the capacity of sewerage and water networks to support proposed level of growth</li> <li>• Concerns that development will exacerbate existing surface water flooding and put existing communities at risk</li> </ul>	<p>The Council will continue to work with both Essex County Council (as the lead local flood authority) and the Environment Agency (as national flood authority) to ensure that the new Local Plan takes account of the latest and most relevant evidence and best practice on flood risk, and that appropriate flood risk management approaches and techniques, such as SuDS, are appropriately integrated into the Plan.</p> <p>A new Strategic Flood Risk Assessment (SFRA) was prepared in July 2018 which provides a source of up to date evidence on flood risk across Rochford District. This SFRA is available to read on the Council's website and will be used to inform future drafts of the new Local Plan.</p> <p>The Council has, and will continue to liaise with both Anglian Water and Essex and Suffolk Water to ensure that the implications of the new Local</p>

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	<ul style="list-style-type: none"> <li>• Concerns over the potential development of greenfield sites which may act to absorb excess rain and flood waters</li> <li>• Concerns over the impact that development in flood risk areas may have on house insurance costs</li> <li>• Some rural areas have no mains sewerage connections and rely on septic tanks or similar; these areas are not suitable for new developments</li> <li>• Support for improvements to flood defences to protect existing and future communities</li> <li>• Water Cycle Study 2015 should be updated</li> </ul>	<p>Plan on water infrastructure, and vice versa, are fully understood and considered.</p>
<p><b>Renewable Energy Generation</b> (Paras. 8.59 to 8.66)</p>	<ul style="list-style-type: none"> <li>• New developments should be required to include renewable energy systems such as biomass / solar / windfarms</li> <li>• Some support for new renewable energy schemes in rural parts of the District</li> <li>• Support for electric vehicle charging point network across the District</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Planning Obligations and Standard Charges</b></p>	<ul style="list-style-type: none"> <li>• Developers should be required to contribute to new infrastructure to support proposed growth</li> <li>• Support for introducing CIL to help fund new infrastructure</li> </ul>	<p>Developers are currently required to provide contributions through a legal agreement to help fund necessary infrastructure improvements to support the development. The need and value of these contributions is determined in partnership</p>

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<p>(Paras. 8.67 to 8.75)</p>	<ul style="list-style-type: none"> <li>• Infrastructure to support growth should not be funded by the tax-payer but by developers</li> <li>• Developers should not be allowed to opt out of their obligations on the basis of maintaining high profits</li> <li>• RDC should do more to ensure the necessary infrastructure is provided to support new developments</li> <li>• Concerns over whether new primary schools are being provided on Hall Road and West Rayleigh developments as required by the Council’s policy</li> </ul>	<p>with the relevant infrastructure provider, including Essex County Council and the NHS.</p> <p>Developer contributions will continue to be collected to support any growth that arises from the new Local Plan. It is the Council’s intention to also prepare a Community Infrastructure Levy (CIL) on developers to help support the collection of these contributions.</p> <p>The only developer contributions that may reduce or be removed entirely because of viability are discretionary contributions such as affordable housing. This approach is supported by national policy.</p>
<p style="text-align: center;"><b>Supporting Health, Community and Culture</b></p> <p>(Paras. 9.1 to 9.2)</p>	<ul style="list-style-type: none"> <li>• Concerns over the capacity of schools and healthcare facilities to meet the increased demand that would result from the proposed level of growth</li> <li>• Concerns over the existing capacity of schools and healthcare facilities, and associated waiting times and quality of service</li> <li>• With an increasing elderly population, it is likely that social and healthcare facilities will face even greater demand in the future</li> <li>• New developments should be supported by new schools, doctors surgeries, dentists, pharmacies and hospitals</li> </ul>	<p>The Council will continue to work with both the NHS and Essex County Council to ensure that any growth planned in the District is sustainable in the context of both health and educational facilities. This may include collecting contributions from developers to fund the capacity improvements needed to support such growth.</p> <p>The role of the new Local Plan is primarily to mitigate the impacts of new growth, not fix existing problems. Wider funding issues with public bodies are outside of the remit of the local planning authority and should be raised with the relevant body.</p>

	<ul style="list-style-type: none"> <li>• Concerns raised over cuts to services including the emergency services, community facilities, schools and healthcare facilities</li> <li>• Concerns raised over lack of basic facilities in some settlements, including Hullbridge and Great Wakering</li> </ul>	
<p><b>Health and Well-being</b> (Paras. 9.3 to 9.11)</p>	<ul style="list-style-type: none"> <li>• Concerns over the existing capacity of healthcare facilities, including Southend Hospital and local GPs, and the associated waiting times and quality of service</li> <li>• Concerns over whether healthcare facilities can meet additional needs generated by proposed level of growth</li> <li>• Concerns that developer contributions will be insufficient to create the additional capacity needed to support proposed growth, and that therefore longer waiting times to existing residents will occur</li> <li>• Concerns that developer contributions may be used to plug existing funding shortages and not actually provide additional capacity</li> <li>• Concerns raised over lack of basic healthcare facilities in some settlements, including Hullbridge and Great Wakering</li> <li>• RDC should take account of the increasing elderly population and the impact this will have on healthcare services</li> </ul>	<p>The Council will continue to work with the NHS to ensure that any growth planned in the District is sustainable in the context of health facilities. This may include collecting contributions from developers to fund the improvements needed to support such growth. These developer contributions must be used for the purposes of providing healthcare facilities for the residents of the new development, and legally cannot be used to address funding gaps elsewhere.</p> <p>The role of the new Local Plan is primarily to mitigate the impacts of new growth, not fix existing problems. Wider funding issues with public bodies are outside of the remit of the local planning authority and should be raised with the relevant body.</p>

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	<ul style="list-style-type: none"> <li>• Concerns over the impact that the potential consolidation of Accident and Emergency services between Southend, Basildon and Broomfield Hospitals would have on quality of healthcare available to local residents</li> <li>• New Local Plan should put public health at its heart and consider impact of poor air quality on residents' health</li> <li>• Green infrastructure and leisure facilities should be provided and improved to encourage residents to live healthier lifestyles</li> </ul>	
<p><b>Community Facilities</b> (Paras. 9.12 to 9.15)</p>	<ul style="list-style-type: none"> <li>• RDC should encourage local people to get involved in initiatives such as 'try it out' sessions at local leisure centres</li> <li>• Concerns raised over the impact that budget cuts to public services has had and may have on community facilities</li> <li>• Community facilities such as libraries have been scaled back to the detriment of those who live in rural areas</li> <li>• Concerns that the planned level of growth may increase crime levels given cuts in local policing</li> <li>• Support for improving local amenities such as gyms and cinemas in local towns</li> </ul>	<p>Comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>

	<ul style="list-style-type: none"> <li>• Concerns over the capacity of the recycling centre at Castle Road to support the proposed level of growth</li> <li>• Concerns over a perceived lack of car parking at peak times and a lack of parking capacity to support the proposed level of growth</li> </ul>	
<p><b>Education and Skills</b> (Paras. 9.16 to 9.29)</p>	<ul style="list-style-type: none"> <li>• Concerns over the capacity of primary and secondary schools to support the increased pupil numbers that would result from the proposed level of development</li> <li>• Concerns over the capacity of developer contributions to provide the necessary capacity increases to support growth</li> <li>• Reference made to ECC funding gaps and perceived lack of capacity to provide school improvements</li> <li>• Concerns that developments at Hall Road and West Rayleigh which were required in the Council’s policy to provide schools may not now need to provide schools</li> <li>• Problems cited with secondary school education in Great Wakering and Hullbridge where a large number of children have to be bussed a long distance to the nearest secondary school</li> </ul>	<p>The Council will work with Essex County Council to ensure that any growth planned in the District is sustainable in the context of education facilities. This may include collecting contributions from developers to fund the improvements needed to support such growth. Where justified, schools will be expanded or new schools provided to support this growth.</p> <p>The role of the new Local Plan is to primarily mitigate the impacts of new growth, not fix existing problems. Wider funding issues with public bodies are outside of the remit of the local planning authority and the new Local Plan.</p>

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	<ul style="list-style-type: none"> <li>• New schools are needed to support the proposed levels of growth; as a preference to expanding existing schools</li> <li>• Concerns over the impact that existing and proposed growth is having on class size numbers and quality of education</li> </ul>	
<p><b>Early Years and Childcare</b> (Paras. 9.30 to 9.36)</p>	<ul style="list-style-type: none"> <li>• Concerns raised over the capacity of early years and childcare facilities to support proposed levels of growth</li> <li>• Issues raised around existing long waiting lists for nurseries and childcare services</li> </ul>	<p>The Council will work with Essex County Council to ensure that any growth planned in the District is sustainable in the context of early years and childcare facilities. This may include collecting contributions from developers to fund the improvements needed to support such growth.</p> <p>The role of the new Local Plan is to primarily mitigate the impacts of new growth, not fix existing problems. Wider funding issues with public bodies are outside of the remit of the local planning authority and the new Local Plan.</p>
<p><b>Open Space and Outdoor Sports and Recreation</b> (Paras. 9.37 to 9.42)</p>	<ul style="list-style-type: none"> <li>• RDC should undertake a comprehensive appraisal of all sports facilities in the District</li> <li>• Concerns raised over the quantity and quality of recreational facilities in the District</li> <li>• Open spaces should be protected from development</li> <li>• Informal play area at Malvern Road should be protected from development</li> </ul>	<p>The Council, in partnership with local authorities across South Essex, has commissioned an assessment of Playing Pitches and Indoor Facilities across the region. This assessment, once complete, will help to inform the new Local Plan by providing an up to date and robust source of evidence on both the quantity and quality of sports and recreational facilities in the District, and their capacity to support future population growth. Where it is identified that new or improved facilities are required to support this growth, developers will</p>

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	<ul style="list-style-type: none"> <li>• Role of local woodlands should be acknowledged and protected, such as use of Hockley and Beckney Woods by walkers</li> </ul>	<p>be required to contribute to the funding of these facilities.</p> <p>A Green and Blue Infrastructure Study is being commissioned across South Essex which will consider, among other things, the role that green spaces play in South Essex and identify opportunities for improvement. It is intended that this study will help to inform local plan-making across South Essex, as well as the South Essex Joint Strategic Plan.</p>
<p><b>Indoor Sports and Leisure Centres</b> (Paras. 9.43 to 9.50)</p>	<ul style="list-style-type: none"> <li>• Support for protecting and improving existing leisure centres</li> <li>• General support for Option A</li> </ul>	<p>Comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Facilities for Young People</b> (Paras. 9.51 to 9.56)</p>	<ul style="list-style-type: none"> <li>• Concerns raised over a lack of suitable facilities for younger people across the District</li> <li>• Support for protecting and improving facilities for young people</li> <li>• General support for Option A</li> </ul>	<p>Comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Play Space Facilities</b> (Paras. 9.57 to 9.61)</p>	<ul style="list-style-type: none"> <li>• Concerns raised over the quality of existing play spaces</li> <li>• Support for protecting and improving play space facilities</li> <li>• General support for Option A</li> </ul>	<p>Comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>



<p><b>Protecting and Enhancing Our Environment</b> (Paras. 10.1 to 10.4)</p>	<ul style="list-style-type: none"> <li>Proposed level of development would negatively impact the rural character and environmental quality of the District</li> <li>Concerns raised over the impact that housing developments would have on agricultural land and crop production</li> <li>Support for safeguarding land of high agricultural value from development</li> <li>Concerns raised over the impact that housing developments and a greater population would have on wildlife and biodiversity</li> <li>Areas of wildlife value such as Local Wildlife Sites and Local Nature Reserves should be protected from development</li> <li>Support for protecting the Green Belt from additional development</li> </ul>	<p>The impacts of the new Local Plan on areas of high environmental quality will be assessed through a Habitats Regulations Assessment (HRA) and Sustainability Appraisal (SA). The Council is also updating its evidence on Local Wildlife Sites to consider whether there is justification to maintain, add or delete sites from this designation. Development would generally not be permitted on areas designated for their environmental quality.</p> <p>The NPPF is clear that Green Belt release should only be considered where it has been established that other sources of housing supply are insufficient to meet identified needs.</p>
<p><b>Green Belt</b> (Paras. 10.5 to 10.16)</p>	<ul style="list-style-type: none"> <li>Concerns over the impact that the proposed level of growth would have on Green Belt land and how this relates to the NPPF and recent government statement</li> <li>Support for protecting the Green Belt from additional development</li> <li>Proposed levels of growth would result in urban sprawl contrary to national policy on Green Belts</li> </ul>	<p>The Council has jointly commissioned Green Belt and Landscape Character assessments with Southend-on-Sea Borough Council under the duty to co-operate. These assessments will provide a robust and up to date source of evidence on the District’s Green Belt and Landscape Character including whether there would be justification to release land from the Green Belt to facilitate housing growth if required to meet identified need.</p>

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	<ul style="list-style-type: none"> <li>• RDC should look to protect the rural character of the District and not allow it to become urbanised</li> <li>• Relationship between green space and physical and mental health should be acknowledged. Development on Green Belt would be contrary to this.</li> <li>• Concerns raised over the impact of development of Green Belt land on valued views and landscape</li> <li>• Brownfield land should be developed before any Green Belt land</li> </ul>	<p>The NPPF is clear however that Green Belt release should only be considered where it has been established that other sources of housing supply cannot meet identified needs. These other sources of housing supply would include any available brownfield land.</p>
<p style="text-align: center;"><b>Biodiversity, Geology and Green Infrastructure</b>  (Paras. 10.17 to 10.29)</p>	<ul style="list-style-type: none"> <li>• Concerns over the impact that the proposed level of growth would have on wildlife and local ecology</li> <li>• Areas of wildlife value such as Local Wildlife Sites and Local Nature Reserves should be protected from development</li> <li>• Concerns over the impact that the proposed level of growth would have on protected species including badgers, newts and bats</li> <li>• Relationship between green space and physical and mental health should be acknowledged. Development on Green Belt would be contrary to this.</li> <li>• Green infrastructure should be improved and made more accessible to residents</li> </ul>	<p>The impacts of the new Local Plan on areas of high environmental quality will be assessed through a Habitats Regulations Assessment (HRA) and Sustainability Appraisal (SA). The Council is also updating its evidence on Local Wildlife Sites to consider whether there is justification to protect new sites or delete sites that are no longer worthy of protection. Development would generally not be permitted in areas designated for their environmental quality.</p> <p>The Council also remains committed to the Essex Coast RAMS Project. The RAMS project will require developers to contribute to funding mitigation schemes that off-set the harm caused by recreational visits to highly sensitive environmental areas ('Natura 2000' sites). In Rochford, these</p>

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	<ul style="list-style-type: none"> <li>Concerns over the impact that development in villages has on the rural wildlife of the area</li> </ul>	highly sensitive areas are the Crouch and Roach Estuaries and Foulness Island.
<b>Wallasea Island and the RSPB's Wild Coast Project</b> (Paras. 10.30 to 10.34)	<ul style="list-style-type: none"> <li>Support for Option A</li> </ul>	Support noted. These points will be considered when preparing future drafts of the new Local Plan.
<b>Landscape Character</b> (Paras. 10.35 to 10.44)	<ul style="list-style-type: none"> <li>Concerns raised over the impact of the new development on valued views and landscapes</li> <li>Landscape quality should be assessed and not be protected 'for the sake of it.'</li> </ul>	The Council has jointly commissioned a Landscape Character, Sensitivity and Capacity Study with Southend-on-Sea Borough Council under the duty to co-operate. This study will assess the landscape character of the District and its sensitivity to new developments. It is expected that this study will provide an up to date and robust source of evidence on landscape quality to inform each Councils' respective Local Plans.
<b>Protecting and Enhancing Heritage and Culture</b> (Paras. 10.45 to 10.52)	<ul style="list-style-type: none"> <li>Support for protecting and enhancing areas and assets of historic value such as Listed Buildings and Conservation Areas</li> <li>Concerns raised over reliance on the Local List to provide protection to historic assets</li> <li>Support for Option A</li> </ul>	Comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.
<b>Good Design and Building Efficiency</b>	<ul style="list-style-type: none"> <li>Support for requiring good standards of design; concerns raised over the design quality of some previous developments</li> </ul>	Comments noted. These points will be considered when preparing future drafts of the new Local Plan.

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<p>(Paras. 10.53 to 10.63)</p>	<ul style="list-style-type: none"> <li>• RDC should consider light, shade and views of new housing</li> <li>• Concerns raised over the small size of gardens being provided on new housing</li> </ul>	
<p style="text-align: center;"><b>Air Quality</b> (Paras. 10.64 to 10.72)</p>	<ul style="list-style-type: none"> <li>• Concerns raised over the impact that poor air quality, including along Rayleigh High Street and the A127, is having on residents' health</li> <li>• Concerns over the impact that the proposed level of growth and increase in population would have on air quality, including by increasing the numbers of cars in the area</li> <li>• RDC should acknowledge the connection between increased levels of traffic and air quality</li> <li>• Development of greenfield land worsens air quality as trees and plants clean air</li> </ul>	<p>An Air Quality Management Area (AQMA) has been designated in Rayleigh Town Centre, and development will be restricted in that area until such time that air quality reduces to accepted levels.</p> <p>The issue of air quality will be considered in depth in future drafts of the new Local Plan, and the impact of growth on air quality will be a fundamental consideration in identifying a preferred policy approach.</p> <p>Comments around existing air quality levels will be passed to the Council's environmental health team for consideration.</p>
<p style="text-align: center;"><b>Detailed Policy Considerations</b> (Para. 11.1)</p>	<ul style="list-style-type: none"> <li>• RDC should monitor levels of construction traffic and the impact on local roads and people</li> </ul>	<p>Larger developments are generally accompanied by a Construction Management Plan which aims to mitigate and manage the impact of construction traffic on local communities.</p>
<p style="text-align: center;"><b>Mix of Affordable Homes</b> (Paras. 11.2 to 11.5)</p>	<ul style="list-style-type: none"> <li>• Concerns raised around the occupiers of affordable units and whether these units are reserved for people with a local connection to Rochford</li> <li>• Support for Option F</li> </ul>	<p>Comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.</p> <p>Certain affordable housing is generally provided firstly to people on the Council's housing register.</p>

**Rochford District Council New Local Plan – Issues and Options Document Feedback Report**

<p><b>Self-Build and Custom-Build Homes</b> (Paras. 11.6 to 11.12)</p>	<ul style="list-style-type: none"> <li>• Support for Option A</li> </ul>	<p>Support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Rural Exceptions Sites</b> (Paras. 11.13 to 11.19)</p>	<ul style="list-style-type: none"> <li>• Support for Options G and H</li> </ul>	<p>Support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Annexes, Outbuildings and Independent Homes</b> (Paras. 11.20 to 11.27)</p>	<ul style="list-style-type: none"> <li>• Support for Option B</li> </ul>	<p>Support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Basements</b> (Paras. 11.28 to 11.36)</p>	<ul style="list-style-type: none"> <li>• Support for Option A</li> </ul>	<p>Support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Replacement, Rebuild or Extension of Existing Green Belt Homes</b> (Paras. 11.37 to 11.40)</p>	<ul style="list-style-type: none"> <li>• Concern that the 25% policy restriction on Green Belt extensions is too restrictive and should be reviewed</li> </ul>	<p>The NPPF requires extensions to properties in the Green Belt to be proportionate to the size of the original dwelling. The Council determined at the time of its current Plan that a 25% addition would be proportionate however it will review this position when preparing future drafts of the new Local Plan. It is noted that permitted development rights apply</p>

**Rochford District Council New Local Plan – Issues and Options Document Feedback Report**

		to dwellings in the Green Belt which may allow much larger extensions.
<p><b>Agricultural, Forestry and Other Occupation Homes</b> (Paras. 11.41 to 11.44)</p>	<ul style="list-style-type: none"> <li>• Support for Option A</li> <li>• Agricultural tied housing could become vacant or derelict if no longer needed</li> </ul>	<p>Comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Development of Previously Developed Land</b> (Paras. 11.45 to 11.49)</p>	<ul style="list-style-type: none"> <li>• Support for Option A</li> </ul>	<p>Support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Extension of Domestic Gardens in the Green Belt</b> (Paras. 11.50 to 11.53)</p>	<ul style="list-style-type: none"> <li>• Support for Option A</li> </ul>	<p>Support noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<p><b>Parking Standards and Traffic Management</b></p>	<ul style="list-style-type: none"> <li>• Support for Option A</li> <li>• Concerns raised over adequacy of parking in some areas of the District, and impact that on-street parking has on the character of an area</li> </ul>	<p>The Council may seek to review its Parking Standards as part of its new Local Plan to ensure they are up to date and robust to support new development.</p>

## Rochford District Council New Local Plan – Issues and Options Document Feedback Report

(Paras. 11.54 to 11.57)	<ul style="list-style-type: none"> <li>Existing standards must not be requiring enough parking to be provided off-street given high levels of on-street parking</li> </ul>	Existing parking issues should be alerted to the South Essex Parking partnership for their attention.
<b>Homes Businesses</b> (Paras. 11.58 to 11.61)	<ul style="list-style-type: none"> <li>Support for Option A</li> </ul>	Support noted. These points will be considered when preparing future drafts of the new Local Plan.
<b>Alterations to Existing Business Premises</b> (Paras. 11.62 to 11.65)	<ul style="list-style-type: none"> <li>Support for Options A and B</li> </ul>	Support noted. These points will be considered when preparing future drafts of the new Local Plan.
<b>Advertising and Signage</b> (Paras. 11.66 to 11.72)	<ul style="list-style-type: none"> <li>Support for Option A</li> <li>Concerns raised over a perceived increase in the use of 'A-boards' on pavements and verges which are obstructing people with pushchairs, wheelchairs and mobility scooters</li> </ul>	<p>Concerns over A-boards being placed on pavements should be alerted to Essex County Council as the highway authority.</p> <p>All other comments noted. These points will be considered when preparing future drafts of the new Local Plan.</p>
<b>Light Pollution</b> (Paras. 11.73 to 11.76)	<ul style="list-style-type: none"> <li>Concerns raised over the impact that artificial lighting is having on species such as bats</li> <li>Support for Option B</li> </ul>	Comments and support noted. These points will be considered when preparing future drafts of the new Local Plan.
<b>Contaminated Land</b>	<ul style="list-style-type: none"> <li>Support for Option A</li> </ul>	Support noted. These points will be considered when preparing future drafts of the new Local Plan.

(Paras. 11.77 to 11.81)		
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## Appendix A: Copies of Promotional Material

A1 – Copy of postal leaflet

# Issues and Options Document - Consultation

Get involved in the future of your district!

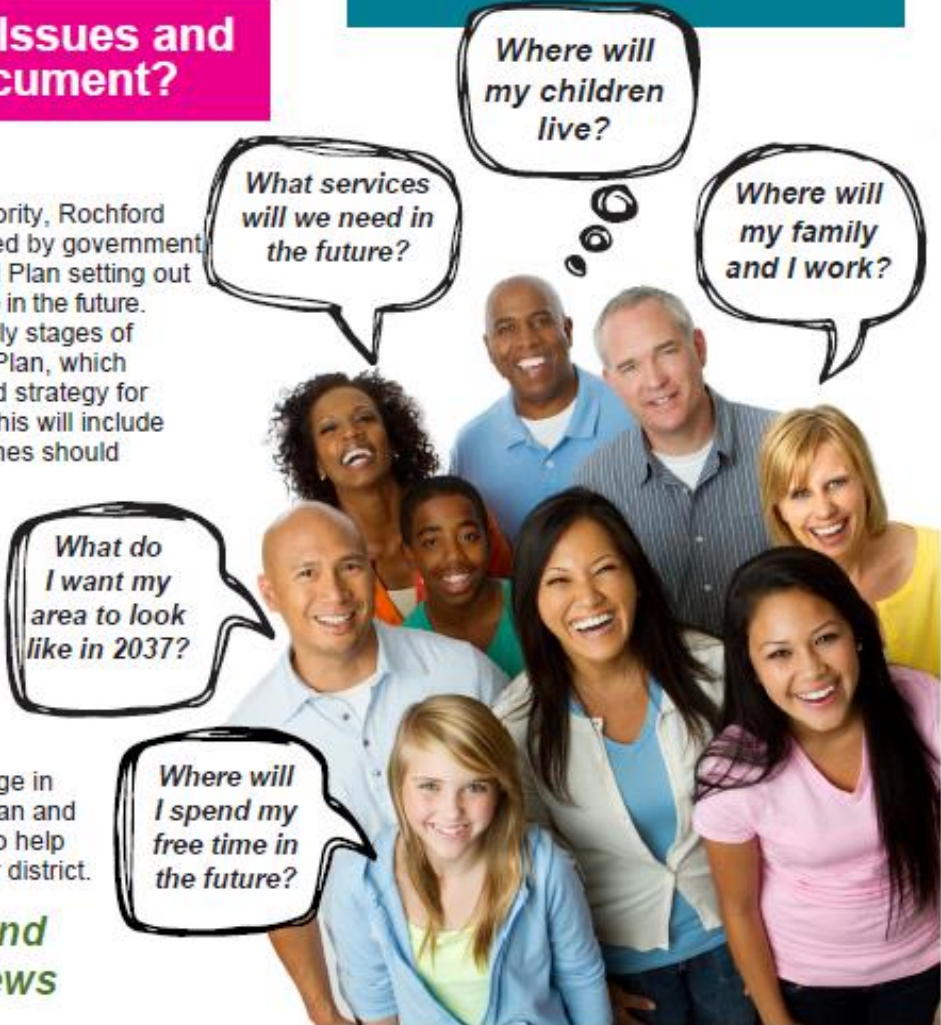


The Issues and Options Document public consultation will be open from 13th December 2017 to 5pm on 7th March 2018

## What is the Issues and Options Document?

As a local planning authority, Rochford District Council is required by government policy to prepare a Local Plan setting out how our area will develop in the future. The Council is at the early stages of preparing its new Local Plan, which will set out our vision and strategy for the district up to 2037. This will include how and where new homes should be delivered, how to support and grow the local economy and jobs, what infrastructure will be needed and where, and how we will preserve our natural and historic environments. The Issues and Options Document is the first stage in Rochford's new Local Plan and is your first opportunity to help shape the future for your district.

**Get involved and tell us your views**



## How can I view the Issues and Options Document?

You can view the document online at [www.rochford.gov.uk/iao](http://www.rochford.gov.uk/iao) or by following the QR code.

Paper copies will be available to inspect at Rochford and Rayleigh Council Offices, Parish/Town Council Offices and all local libraries during normal opening hours.

If you have issues accessing the document, email us at [issuesandoptions@rochford.gov.uk](mailto:issuesandoptions@rochford.gov.uk) or call 01702 318191.

## How can I comment?

**Online:** [www.rochford.gov.uk/iao](http://www.rochford.gov.uk/iao). This is the quickest way to send us your views. You'll receive instant confirmation that we've received them and all you need is a valid email address.

**Email:** [issuesandoptions@rochford.gov.uk](mailto:issuesandoptions@rochford.gov.uk)

**Post:** Planning Policy, Council Offices, South Street, Rochford, SS4 1BW

**Fax:** 01702 318181

We can't accept anonymous responses, so however you contact us please include your contact details.

## What happens to my comments?

As we can't accept discriminatory, abusive, or defamatory comments, all comments will be read and approved by officers and published online. However you send us your views – online is the quickest way – these will all be considered by officers and will help to inform and shape the new Local Plan. So, if you want to be kept informed why not sign up to our mailing list below.

## What events are taking place?

We'll be holding 4 public drop-in events where local residents and businesses can ask questions and find out more information. These will be held at:

- Rayleigh WI Hall, Bellingham Lane, SS6 7ED: 3pm to 9pm on Monday 15th January 2018
- Hockley Old Fire Stn, 58 Southend Road, SS4 4QH: 3pm to 9pm on Tuesday 16th January 2018
- Rochford Parish Rooms, 82 West Street, SS4 1AS: 3pm to 9pm on Tuesday 6th February 2018
- Rayleigh WI Hall, Bellingham Lane, SS6 7ED: 3pm to 9pm on Monday 19th February 2018

## How can I be kept up-to-date?

This consultation is open until 5pm on 7th March 2018. If you're interested and want to be kept up-to-date, but don't want to comment now, sign up for e-bulletins at [rochford.gov.uk/tellmemore](http://rochford.gov.uk/tellmemore) or follow us on Twitter or Facebook. If you don't have access to a computer, you can receive free text alerts by texting 'planning' to 07860 035566 – not only does this help save the environment, you'll be instantly sent relevant updates and opportunities for you to get involved in the future! Alternatively, send us your postal address.

The Issues and Options Document public consultation will be open from  
**13th December 2017 to 5pm on 7th March 2018**



## A2 – Copy of media notice



Rochford District Council is preparing a new Local Plan to set the vision and policies for Rochford over the next 20 years and are encouraging local residents and businesses to provide their views.

You can access the consultation online at [www.rochford.gov.uk/iao](http://www.rochford.gov.uk/iao) or paper reference copies are available at local council offices and libraries

You can also stay up-to-date by signing up to e-alerts at  
[www.rochford.gov.uk/tellmemore](http://www.rochford.gov.uk/tellmemore)

**Issues and Options public consultation open until 5pm on 7 March 2018**



## A3 – ‘Business Card’ Design

The business card features the Rochford District Council logo on the left, which includes a stylized house with a red roof and a green leaf. To the right of the logo, the text reads "Rochford District Council" in a small font, "localplan" in a large, bold, green font, and "Shaping the future together" in a smaller font below it. Below the logo and text, there are five colored boxes containing the words "Housing", "Jobs", "Infrastructure", "Environment", and "Community". Below these boxes, the text states "Issues and Options public consultation open until 5pm on 7 March 2018". At the bottom left is the "tellmemore" logo, and at the bottom right is the Rochford District Council logo.

Rochford District Council  
**localplan**  
Shaping the future together

Housing Jobs Infrastructure Environment Community

Issues and Options public consultation open until  
**5pm on 7 March 2018**

tellmemore Rochford District Council

Rochford District Council are preparing a new Local Plan to set the vision and policies for Rochford over the next 20 years and are asking for your views

You can access the consultation online at [www.rochford.gov.uk/iao](http://www.rochford.gov.uk/iao) or paper reference copies are available at local council offices and libraries

You can also stay up-to-date by signing up to e-alerts at [rochford.gov.uk/tellmemore](http://rochford.gov.uk/tellmemore)

*Help shape the future of your district*



## A4 – Copy of Promotional Poster

Nb: The details of the drop-in session being promoted on the poster varied by location

# Issues and Options Document - Consultation

Help shape the future for your district!



Stay up to date with planning updates by signing up for e-bulletins at [rochford.gov.uk/tellmemore](http://rochford.gov.uk/tellmemore) or text alerts by texting 'planning' to 07860 035566

Drop in anytime between 3pm and 9pm on Tuesday 16 January at Hockley Old Fire Station, Southend Road, SS5 4QH if you want to find out more!

The Issues and Options Document is the first stage in preparing a new Local Plan for Rochford District, setting out the opportunities and challenges for the future of the district including homes, jobs, infrastructure and the environment!

Help to shape the future for your district by reading and commenting on these Issues and Options Document online at [www.rochford.gov.uk/iao](http://www.rochford.gov.uk/iao) or by inspecting a paper copy at Rochford District Council offices, local Parish/Town Council offices and local libraries during normal opening hours.

The Issues and Options Document public consultation will be open from 13th December 2017 to 5pm on 7th March 2018  
Get involved and tell us your views



## A5 – Promotional Roller Banner displayed at events





## A6 – Example set-up at drop in events



## A7 – Copy of email bulletins sent to mailing list subscribers

[View as a web page](#)



13 December 2017

## Planning

Issues and Options Document public consultation now open!



The Issues and Options Document public consultation is now open and will run for a period of 12 weeks, closing at **5pm on Wednesday 7 March 2018**. We are encouraging all residents, businesses and other stakeholders to make their views known and help to shape the future of your district.

The Issues and Options Document is the first stage of Rochford District Council's new Local Plan, which will set out the vision and strategy for the district up to 2037. The Document sets out a range of identified challenges and opportunities facing the district over the next 20 years, including how and where new homes should be delivered, how to support and grow the local economy and jobs, what infrastructure will be needed and where, and how we will preserve our natural and historic environments. It is accompanied by a Sustainability Appraisal which examines the key sustainability issues with the identified options. The Issues and Options Document is your first opportunity to get involved in your new Local Plan and to help shape the future for your district.

The fastest and easiest way to view and comment on the Issues and Options Document is online at [www.rochford.gov.uk/iao](http://www.rochford.gov.uk/iao). Alternatively, paper reference copies and response forms will be available at Rochford and Rayleigh Council offices, Parish/Town Council offices and all local libraries during normal opening hours.

Please click find 'Read More' below for more information.

[Read more](#)

Issues and Options Public Drop-in Sessions

To help residents and businesses through the consultation process, we will be holding 4 public drop-in sessions where local residents and businesses can ask questions and find out more information from Council officers. These will be held at:

- Rayleigh WI Hall, Bellingham Lane, SS6 7ED: 3pm to 9pm on Monday 15th January 2018
- Hockley Old Fire Station, 58 Southend Road, SS5 4QH: 3pm to 9pm on Tuesday 16th January 2018
- Rochford Parish Rooms, Rear of 82 West Street, SS4 1AS: 3pm to 9pm on Tuesday 6th February 2018
- Rayleigh WI Hall, Bellingham Lane, SS6 7ED: 3pm to 9pm on Monday 19th February 2018

***Get involved and tell us your views***

[View as a web page](#)



10 January 2018

## Planning

### Understanding affordable housing

#### What is affordable housing?

There are three main forms of affordable housing, these are:

- **Social rented housing** – where a house is let at low rent by local authorities or a registered provider on a secure basis to those who are most in need or struggling with their housing costs. The social rent level is set by government;
- **Affordable rented housing** – where a house is let by local authorities or registered providers to households at a rent at least 20% below local market rents; and
- **Intermediate housing** – where homes are available to buy or rent at below market levels, but above social rent levels. This may include shared ownership and equity loan schemes.

You can find out more about affordable housing, including how homes are allocated, what our need is and how these types of homes are delivered on our website by following the link below.

[Read more](#)

### Issues and Options Document: Upcoming events in January and February 2018

To help residents and businesses through the consultation process, we will be holding 4 public drop-in sessions where local residents and businesses can ask questions and find out more information from Council officers. These will be held at:

- **Rayleigh WI Hall, Bellingham Lane, SS6 7ED: 3pm to 9pm on Monday 15th January 2018**
- **Hockley Old Fire Station, 58 Southend Road, SS5 4QH: 3pm to 9pm on Tuesday 16th January 2018**
- **Rochford Parish Rooms, Rear of 82 West Street, SS4 1AS: 3pm to 9pm on Tuesday 6th February 2018**
- **Rayleigh WI Hall, Bellingham Lane, SS6 7ED: 3pm to 9pm on Monday 19th February 2018**

### Issues and Options Document: Consultation open until 7 March 2018

We are asking for your views on, amongst other issues, how we plan to meet our need for affordable housing over the next 10 to 20 years.



You can find out more information on our consultation, which is open until 7 March 2018, as well as view our Local Plan evidence base, on the Council's website, linked below.

[Read more](#)

[view as a web page](#)



17 January 2018

# Planning

## Understanding Infrastructure

### What is infrastructure?

Infrastructure can be provided by various organisations and funded through different mechanisms, and broadly includes the following types: transport, education, health, social and community (including cultural, leisure, youth facilities and play space), utilities, public services and green and blue infrastructure.

### Who is responsible for key infrastructure?

If you would like to find out more about who is responsible for key infrastructure and how it is planned for, please click 'read more' below.

[Read more](#)

## Issues and Options Document: Consultation open until 7 March 2018

We are asking for your views on, amongst other issues, how we should plan to meet our infrastructure needs over the next 10 to 20 years.



You can find out more information on our consultation, which is open until 7 March 2018, as well as view our Local Plan evidence base, on the Council's website, linked below.

[Read more](#)

## Issues and Options Document: Upcoming events in February 2018

To help residents and businesses through the consultation process, we have recently held 2 public drop-in sessions where local residents and businesses could ask questions and find out more information from Council officers. Two further events are planned in February 2018, which will be held at:

- **Rochford Parish Rooms, Rear of 82 West Street, SS4 1AS: 3pm to 9pm on Tuesday 6th February 2018**
- **Rayleigh WI Hall, Bellingham Lane, SS6 7ED: 3pm to 9pm on Monday 19th February 2018**

[View as a web page](#)



6 February 2018

## Planning

### How do I get involved in the future of the District?

Rochford District Council's current Issues and Options Document consultation is your first formal opportunity to get involved in shaping the new Local Plan for Rochford. This new Local Plan will set out the Council's policies and strategy for Rochford District up to 2037, including the Council's policies on housing, jobs, infrastructure and the environment.

You can access the consultation document online at [www.rochford.gov.uk/localplan](http://www.rochford.gov.uk/localplan) or inspect a paper copy at a Council office, Parish Council office or local library during normal opening hours.

If you wish to make a comment on the consultation, you are able to do so:

- Through the Council's online consultation portal at [www.rochford.gov.uk/iao](http://www.rochford.gov.uk/iao)
- By email to [issuesandoptions@rochford.gov.uk](mailto:issuesandoptions@rochford.gov.uk)
- By letter to Planning Policy, Rochford District Council, South Street, Rochford, SS4 1BW

**Please make sure all comments are received before 5pm on 7 March 2018.**



### What happens to my comments?

Once the consultation window closes, all comments received will be collated into a Consultation Summary and the issues raised will be given an initial response by Council Officers.

Over the course of the next year, the Council will then incorporate any comments received, along with the detailed studies and evidence being produced and the input of key stakeholders, into producing a more specific draft of the new Local Plan. This document is likely to be called the 'Preferred Options' and will again be open to extensive public consultation. This cycle will continue until the Council produces a final proposed Local Plan which it hopes to present to the Government in 2020.

### What is the role of the evidence base?

To ensure that the new Local Plan is both sound and effective, the Council is required to produce detailed evidence on a range of topics. Examples include transport modelling, environmental and sustainability assessments, economic assessments and so on. Once this evidence is produced, the Council can incorporate it into its 'evidence base' and use it to inform its Local Plan policies. When the Council presents its final Local Plan draft to the Government, it will need to demonstrate that it is based on good evidence.

The Council's current evidence base will continue to be updated as new evidence becomes available. To view the Council's evidence base, please click Read More below.

[Read more](#)

## A8 – Social media posts promoting Issues and Options consultation

Nb: Each tweet copied below was accompanied by an identical post to the Council's Facebook page



**Rochford DC** @RochfordDC · 14 Dec 2017



What is your vision for the future of the district? Help shape the future of your district by participating in the **Issues and Options** Document public consultation at [rochford.gov.uk/lao](http://rochford.gov.uk/lao). You have until 5pm Wednesday 7 March 2018 to make your views known



**Rochford DC** @RochfordDC · 19 Dec 2017



How should we plan for housing, jobs **and** infrastructure over the next 20 years? Help shape the future of your district by participating in the **Issues and Options** Document public consultation at [rochford.gov.uk/lao](http://rochford.gov.uk/lao) You have until 5pm on Wed 7 March to make your views known.





**Rochford DC** @RochfordDC · 21 Dec 2017



Where **and** how will you spend your free time in the future? Help shape the future of your district by participating in the **Issues and Options** Document public consultation at [rochford.gov.uk/lao](http://rochford.gov.uk/lao). You have until 7th March to make your views known



**Rochford DC** @RochfordDC · Jan 8



Where **and** how will you access your local health services in the future? Help shape the future of your district by participating in the **Issues and Options** Document public consultation at [rochford.gov.uk/lao](http://rochford.gov.uk/lao). You have until 5pm on Wed 7 March 2018 to make your views known



**Rochford DC** @RochfordDC · Jan 5



How should we plan for housing, jobs **and** infrastructure over the next 20 years? Help shape the future of your district by participating in the **Issues and Options** Document public consultation at [rochford.gov.uk/lao](http://rochford.gov.uk/lao). You have until 5pm on Wed 7 March to make your views known



**Rochford DC** @RochfordDC · Jan 5



What is your vision for the future of the Rochford District? Help shape the future of your district by participating in the **Issues and Options** Document public consultation at [rochford.gov.uk/lao](http://rochford.gov.uk/lao). You have until 5pm in Wednesday 7 March to make your views known





**Rochford DC** @RochfordDC · Jan 8

Where will you go in the future for leisure, eating out, shopping **and** exercising? Help shape the future of your district by participating in the **Issues and Options** Document public consultation at [rochford.gov.uk/lao](http://rochford.gov.uk/lao) You have until 5 pm on 7 March to make your views known



**Rochford DC** @RochfordDC · Jan 15

**#Issuesandoptions** we are asking residents **and** business owners for their thoughts on how they might plan for the future of the district, pop in **and** see us today Rayleigh WI Hall, Bellingham Lane, SS6 7ED, 3pm to 9pm



**Rochford DC** @RochfordDC · Jan 15

We will be holding public drop-in events where local residents **and** businesses can ask questions **and** find out more info RE the **Issues and Options** Document Public Consultation. See [rochford.gov.uk/localplan](http://rochford.gov.uk/localplan) for details of when **and** where the drop in events will be held.







**Rochford DC** @RochfordDC · Jan 15

**#Issuesandoptions** we are asking residents **and** business owners for their thoughts on how they might plan for the future of the district, pop in **and** see us we are at Rayleigh WI Hall, Bellingham Lane, SS6 7ED, until 9pm



**Rochford DC** @RochfordDC · Jan 15

**#Issuesandoptions** if you haven't had chance to meet with our planning policy officers yet, there is still 20 minutes before drop in sessions close at 9pm tonight. There are also future sessions planned, check our website [rochford.gov.uk](http://rochford.gov.uk)



**Rochford DC** @RochfordDC · Jan 15

**#Issuesandoptions** There is still time to have a chat with our planning policy officers who are waiting to hear how you see the future of the district, we are at Rayleigh WI Hall, Bellingham Lane, SS6 7ED, until 9pm tonight.



**Rochford DC** @RochfordDC · Jan 15

**#Issuesandoptions** our planning policy officers are waiting to hear how you see the future of the district, pop in **and** see us we are at Rayleigh WI Hall, Bellingham Lane, SS6 7ED, until 9pm tonight.



**Rochford DC** @RochfordDC · Jan 16



**#Issuesandoptions** We are at Hockley Old Fire Station, Southend Road until 9pm tonight for residents **and** business owners to let us know their thoughts on how they might plan for the future of the district.



**Rochford DC** @RochfordDC · Jan 17



How should we plan for housing, jobs **and** infrastructure over the next 20 years? Help shape the future of your district by participating in the **Issues and Options** Document public consultation at [rochford.gov.uk/iao](http://rochford.gov.uk/iao). You have until 5pm on Wed 7 March to make your views known





**Rochford DC** @RochfordDC · Jan 19

How should we protect **and** enhance our historic centres **and** monuments into the future? Help shape the future of your district by participating in the **Issues and Options** Document public consultation at [rochford.gov.uk/iao](http://rochford.gov.uk/iao). You have until 5pm Wed 7 March to make your views known





**Rochford DC** @RochfordDC · Jan 22

How should we protect **and** enhance our natural environment **and** rich coastlines into the future? Help shape the future of your district by participating in the **Issues and Options** Document public consultation at [rochford.gov.uk/lao](https://rochford.gov.uk/lao). You have until 5pm 7 March to comment



**Rochford DC** @RochfordDC · Feb 6

We are at the Rochford Parish Rooms, West St, Ss4 1AS, until 9pm tonight for the **#issuesandoptions** drop in session. We want residents **and** business owners to let us know their thoughts on how they might plan for the future of the district. For more info [rochford.gov.uk/localplan](https://rochford.gov.uk/localplan)



**Rochford DC** @RochfordDC · Feb 14

How should we plan for housing, jobs **and** infrastructure over the next 20 years? Help shape the future of #Rochford district by participating in the **Issues & Options** Document public consultation at [rochford.gov.uk/lao](http://rochford.gov.uk/lao) .You have until 5pm on Wed 7 March to make your views known



**Rochford DC** @RochfordDC · Feb 21

Where will go in the future for leisure, eating out, shopping, **and** exercising? Help shape the future of your district by participating in the **#IssuesandOptions** Document public consultation at [rochford.gov.uk/lao](http://rochford.gov.uk/lao) . You have until 5pm 7 March 2018 to make your views known





**Rochford DC** @RochfordDC · Feb 21

How will you travel from your home to work in the future? What infrastructure may be needed? Help shape the future of your district by participating in the **#IssuesandOptions** Doc public consultation at [rochford.gov.uk/iao](http://rochford.gov.uk/iao). You have until 5pm on 7 Mar to comment **#haveyoursay**

1 1 1



**Rochford DC** @RochfordDC · Mar 1

The deadline for the **#issuesandoptions** consultation is approaching. What is your vision for the future of Rochford? Participate in the **Issues and Options** Document public consultation at [rochford.gov.uk/iao](http://rochford.gov.uk/iao). You have until 5pm on Wed 7 March

1



**Rochford DC** @RochfordDC · Mar 2

Where **and** how will you spend your free time in the future? Help shape the future of your district by participating in the **#IssuesandOptions** Document public consultation at [rochford.gov.uk/iao](http://rochford.gov.uk/iao). You have until 5pm on Wednesday 7 March 2018 to make your views known.





**Rochford DC** @RochfordDC · Mar 5

2 days left to comment on the **#Issuesandoptions** public consultation - What is your vision for the future of Rochford? To participate in the **Issues and Options Document** public consultation click [rochford.gov.uk/iao](http://rochford.gov.uk/iao). You have until 5pm on 7 March 2018 to make your views known.



**Rochford DC** @RochfordDC · Mar 6

1 day left to comment on the **#Issuesandoptions** public consultation - What is your vision for the future of Rochford? To participate in the **Issues and Options Document** public consultation click [rochford.gov.uk/iao](http://rochford.gov.uk/iao). You have until 5pm on 7 March 2018 to make your views known.





**Rochford DC** @RochfordDC · Mar 7

Thank you to all the residents that have taken part in the **#Issuesandoptions** Consultation. Please see our latest update: [rochford.gov.uk/update-issues-...](https://rochford.gov.uk/update-issues-...)



**Rochford DC** @RochfordDC · Mar 7

Last day to comment on the **#Issuesandoptions** public consultation - What is your vision for the future of Rochford? To participate in the **Issues and Options** Document public consultation click [rochford.gov.uk/iao](https://rochford.gov.uk/iao). You have until 5pm to make your views known.





## A9 – Information on Council website

### New Local Plan: Issues and Options Document (and draft Sustainability Appraisal)

**Latest News: Issues and Options Document (and draft Sustainability Appraisal) Now Open For Consultation until 5pm on 7 March 2018 – find out more below**

#### What is the Issues and Options Document (and draft Sustainability Appraisal)?

The Issues and Options Document (and draft Sustainability Appraisal) forms the first part of the review of our adopted policy documents. It covers a whole range of issues on planning for new homes, new jobs and new infrastructure (such as schools, roads, play spaces), the challenges we face as a district and what our options are for addressing these challenges.

The potential impacts of the different options we have considered in terms of key sustainability issues are also set out in the draft Sustainability Appraisal with a view to avoiding and mitigating potential negative impacts.

The Issues and Options Document (and draft Sustainability Appraisal) is now open for public consultation for a period of 12 weeks, and your comments on both documents are now being invited from **13 December 2017 to 5pm on 7 March 2018**.

## A10 – Issues and Options: Frequently Asked Questions Webpage (FAQs)

# Issues and Options consultation frequently asked questions

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### **What is the 'new Local Plan'?**

A Local Plan is a document that the Council is required to prepare which sets out a district-wide approach to addressing issues such as housing, jobs, infrastructure, the environment, community facilities etc., as well as the detailed planning policies that planning applications will be assessed against.

The Council's current Local Plan was adopted in 2011 and runs up to 2025. The Council has now started work on preparing a new Local Plan, which it aims to adopt in 2021, and which will have a plan period up to 2037.

### **How many homes is the Council planning to deliver in the next 20 years?**

The Council's latest evidence suggests that a total of between 7,200 and 7,800 homes would need to be built over the next 20 years if the District was to meet its full, objectively assessed, housing needs.

Sites that are already allocated for housing development, from adopted plans, are expected to provide around 2,600 new homes by 2025. This includes allocated sites that are currently being built out (such as Hall Road Rochford), allocated sites that have planning permission but are yet to start building (such as West Rayleigh), and allocated sites which are yet to receive planning permission (such as South East Ashingdon).

The Council's latest monitoring also suggests that planning permission exists for around 500 further homes on non-allocated sites, however, the Council has less certainty over the timescales and likelihood of these homes being built.

Nevertheless, any homes that are built contribute towards meeting the district's housing needs, whether they result in a net increase of 1 home or 500 homes. What this means is that the homes currently being built or which have permission to be built contribute towards meeting the district's objectively assessed housing needs of between 7,200 and 7,800 homes. Including only allocated sites, the latest evidence suggests the district's outstanding housing need is around a further 4,600 to 5,200 homes by 2037, although this figure could be subject to change as new evidence and policy emerges. Any additional homes built on non-allocated sites by 2037 will also contribute towards these figures. It should also be noted that the district's housing need of between 7,200 and 7,800 homes is an unconstrained housing need figure. What this means is that it does not take into account the constraints within the district, such as the capacity of its infrastructure, the need to protect its environmentally sensitive areas, flood risk and more.

One of the purposes of preparing a Local Plan is to work out how many homes can actually be delivered or accommodated sustainably over the next 20 years, given all of these constraints. The number of homes that can be delivered becomes the district's actual 'housing target', which will be set out in the new Local Plan, following a number of stages of public consultation and independent examination in public on the 'soundness' of the plan by a government Planning Inspector.

### **How does the Council work out its housing target?**

The Council is at the early stages of preparing a new Local Plan for the district. Some of the key requirements of preparing this Local Plan is to examine and take account of available evidence, take on board the views of key stakeholders (such as Essex County Council, the NHS, utility providers etc.) as well as the outcomes of extensive public consultation, and understand how many homes can be delivered sustainably in the District, including when these should be built and where these should go.

You can have your say on how you think the Council's new Local Plan should approach housing delivery by responding to our current Issues and Options Public Consultation. You can find out more [here](#).

### What is the 'Call for Sites'?

In 2014, the Council adopted a plan, which allocated a number of sites across the district for new homes – some of which have been or are being built out. These sites are expected to deliver around 250 homes a year up to 2025. For detailed information on these allocations, please refer to the 'Allocations Plan', which is available at [this link](#)

To help identify potential sites that may be capable of delivering homes across the district after 2025, the Council undertook a 'Call for Sites' where landowners and/or agents were able to put their land forward for consideration. The Council has given an initial assessment of all these sites as part of its 'Strategic Housing and Employment Land Availability Assessment 2017'. You may have seen maps taken from this assessment online – these simply show the outlines of all the sites included in the assessment, including those sites which are considered unsuitable for development. This evidence base document does not set policy or allocate land and there are no sites proposed in the Issues and Options Local Plan.

Most of the sites included were not considered to be suitable for development as part of the assessment, owing to falling within the Green Belt or other areas where development is constrained or restricted. However, as part of its new Local Plan process, the Council will need to look at whether any sites have potential to deliver homes in the medium to long term. This may include looking to see whether any sites should potentially be released from the Green Belt in order to deliver new homes and jobs in the future to seek to meet identified need.

In order to answer that question, the Council needs to undertake further evidence base studies, including a detailed assessment of its Green Belt as well as transport modelling; it will also need to undertake further public consultation. You can have your say on how you think the Council's new Local Plan should approach housing delivery by responding to our current Issues and Options Public Consultation. You can find out more at [this link](#)

### What is infrastructure and how is it planned for?

Infrastructure is a general term for the structures, facilities and services that help support everyday life. It includes things such as the road and transport networks, healthcare institutions, schools and the utilities for example.

Not all planned infrastructure is controlled or delivered by Rochford District Council. For example, Essex County Council is responsible for the road network, public transport and schools, whilst the NHS is responsible for healthcare institutions.

Rochford District Council works alongside the providers of infrastructure throughout the planning process, including when drawing up policies, considering sites for development and determining planning applications. These providers help identify what infrastructure would be needed to support new developments, and may request financial or physical contributions from developers (through a legal agreement) in order to provide improvements to existing infrastructure or, in some cases, brand new infrastructure to help support these developments. The level of infrastructure improvements required will reflect the capacity of existing infrastructure (such as the number of surplus school places in the area, capacity at GPs surgeries etc.) and the number of new residents who would need to use that existing infrastructure. In some cases, there may be enough capacity in the existing infrastructure to accommodate these new residents. As a result, the amount of new/improved infrastructure provided by a development does not only depend on the size of the development but also on the capacity of existing infrastructure at that time.

The Council is required to produce an Infrastructure Delivery Plan (IDP) alongside its new Local Plan, to set out what infrastructure will be needed to sustainably support planned new development and how this is expected to be funded. The Council has recently produced an initial Infrastructure Delivery Topic Paper, which is available [here](#).

For more detailed information on the processes through which new infrastructure is delivered, please read the FAQ below.

### **How and when is new infrastructure delivered? What are Section 106 agreements?**

As discussed above, major developments may be required to provide infrastructure improvements to support the new development. The way that this is usually done is through a legal agreement (called a Section 106 agreement) between the landowner/developer, Rochford District Council and other infrastructure providers. This legal agreement will set out the amounts of money or physical infrastructure (“contributions”) that will need to be provided by the landowner/developer and when these need to be provided. The Section 106 agreement is a legally binding document and failure to follow it may invalidate the planning permission.

Contributions will normally need to be paid or provided before reaching a particular stage in the development. For example, a healthcare contribution may need to be paid to the NHS before any homes on a site can be lived in. The stage at which a contribution towards infrastructure is due will be set out in that particular development’s Section 106 agreement and will need to be agreed by both the developer and the relevant infrastructure provider.

Once paid, the way in which any financial contributions are spent is generally at the discretion of the infrastructure provider. As an example, a developer may be required to provide a financial contribution to the NHS in order to provide healthcare facilities for the residents of a new development they are building. How this money is spent, e.g. to provide a new GP surgery or to increase capacity at an existing GP surgery, is for the NHS to decide, but any financial contribution must be spent in relation with the development to which it is tied.

A Section 106 agreement is not the only way in which new or improved infrastructure is provided. Infrastructure providers will typically have their own ambitions and plans to improve their services, which might include road and junction improvement schemes, plans to expand a hospital, plans to expand a school and so on. Rochford District Council works alongside infrastructure providers to ensure that these ambitions and plans align with the local planning work of the Council, and these plans will generally be funded by the infrastructure providers themselves, or through grant funding from the government, and not through legal agreements with developers. For more detailed information on the future plans of these infrastructure providers, you are encouraged to contact the relevant provider.

For more information on how the Council plans for infrastructure, please visit [this link](#)

For more information on the Council’s current Section 106 agreements, please view the spreadsheet [at this link](#).

### **What is the role of the government?**

Once the Council has produced a draft new Local Plan, it will need to submit this draft Local Plan to a government agency called the Planning Inspectorate who will check its soundness in a process called an independent examination in public. This includes making sure it is in accordance with government regulations and policies and is based on robust evidence as well as being deliverable. The Council intends to submit its draft Local Plan for examination in 2020, and will not be able to adopt it until it has been approved or been found ‘sound’ through this process and adopted by the Council.

### **What happens if the Council does not produce a new Local Plan?**

If the Council does not produce a new Local Plan, or its plan is found to be unsound at independent examination, there is a risk that the Council’s current local plan could become ‘out of date’ and may not be able to be used to make planning decisions. The Council would then need to rely on general government-produced planning policy (including the National Planning Policy Framework, and Planning Practice Guidance) and could have less control over the development that goes ahead.

## **Appendix B: List of bodies and persons from which representations were received**

### **Government Agencies / Public Bodies**

Anglian Water  
Education and Skills Funding Agency  
Environment Agency  
Historic England  
Marine Management Organisation  
Natural England  
NHS Community Health Partnerships  
NHS Property Services  
Sport England

### **Interest groups / Trusts**

Essex Bridleways Association  
Essex Wildlife Trust  
Home Builders Federation  
Royal Society for the Protection of Birds (RSPB)  
Theatres Trust  
Woodland Trust

### **Parish / Town Councils**

Ashingdon Parish Council  
Hawkwell Parish Council  
Hockley Parish Council  
Hullbridge Parish Council  
Rawreth Parish Council  
Rayleigh Town Council  
Rochford Parish Council

### **Non-statutory community organisations**

Action Groups Resisting Over-Development (AGRO)  
Great Wakering Independent Action Group

Hullbridge Residents Association

Rayleigh Action Group

**Neighbouring Authorities**

Basildon Borough Council

Brentwood Borough Council

Castle Point Borough Council

Essex County Council

Maldon District Council

Southend-on-Sea Borough Council

Thurrock Council

**Developers / Agents / Landowners**

Armstrong Rigg Planning (on behalf of Manor Oak Homes)

Bidwells (on behalf of Essex Housing and Crest Nicholson)

Claremont Planning Consultancy (on behalf of Southern & Regional Developments Ltd.)

FirstPlan

Gladmans Development Ltd.

GL Hearn Limited

GVA

Iceni (on behalf of Cogent Land LLP)

Indigo Planning (on behalf of Sainsbury's Supermarkets Limited)

Pegasus Group (on behalf of Taylor Wimpey)

Phase 2 Planning Ltd. (on behalf of Countryside Properties)

Persimmon Homes

Quod (on behalf of Equation Properties Limited)

Sellwood Planning (on behalf of Rydon Homes)

Strutt and Parker (on behalf of various)

Whirledge and Nott (on behalf of various)