

1.1 INTRODUCTION

- 1.2 Essex County Council (ECC) strongly supports the preparation of a new Local Plan for Rochford District Council (RDC). A Local Plan by setting out a vision and policies for the long-term planning and development of the district should provide a platform from which to secure a sustainable economic, social and environmental future to the benefit of its residents, businesses and visitors. A robust long-term strategy will provide a reliable basis on which ECC (and any future local government authority given Local Government Reform), and its partners may plan future service provision and required infrastructure for which they are responsible. ECC will also use its best endeavours to assist RDC on strategic and cross-boundary matters under the duty to cooperate (or any replacement process), including engagement and co-operation with other organisations for which those issues may have relevance.
- 1.3 Everyone’s Essex, ECCs organisation strategy, sets out four strategic areas and 20 commitments. One strategic aim seeks a strong, inclusive and sustainable economy. This strategic aim includes a commitment to deliver and maintain high quality infrastructure to support a growing economy and the delivery of new homes and communities. Achieving this requires us to ensure that the development, planning and infrastructure delivery across the administrative county, can be aligned and support the Local Plans that are being prepared across the county, at its boundaries and beyond. This is to ensure that the planned growth includes provision for the delivery of ECC’s infrastructure and services commensurate with the growth being planned, and to support existing and future residents and businesses.
- 1.4 The Government expects every local planning authority (LPA) to rapidly create a clear, ambitious local plan for high quality housebuilding and economic growth. A local plan contains policies to guide development by identifying a spatial strategy, site allocations for employment and housing development and supporting infrastructure. It also seeks to protect the environment, land, and buildings for certain uses to ensure delivery of sustainable communities.
- 1.5 Plan-led development is very important for ECC and the Essex economy. It enables us to ensure infrastructure is provided in the right places at the right time and provides much needed market certainty for investors and business. It also clarifies where new development should be located but equally important it identifies areas where development should not be located. Local Plans provide the policy basis for us to properly address and mitigate the impact of development and ensure our corporate objectives have a basis in local planning policies. Unplanned development is a poor substitute where a council does not have a Local Plan, it is far more expensive for the public purse, is generally of a much poorer quality and certainly is a major cause of concern to local people.
- 1.6 Changes to the National Planning Policy Framework (NPPF) in 2024 and the Government’s on-going planning reform agenda, retain the pivotal role of local plans in guiding and supporting the delivery of growth across the country, together with emphasising the need to maintain effective cooperation between LPAs and county councils through the Duty to Cooperate (further detail on this matter is provided in this response). The ambitious ‘housing targets’ set by the Government are now mandatory with the challenge set to local authorities to help deliver these through local plan-making.
- 1.7 The Planning and Infrastructure Act 2025 (PIA) requires upper tier local authorities which in Greater Essex means ECC, together with Southend and Thurrock Unitary Councils to produce a Spatial Development Strategy (SDS) which set out the scale and broad locations for growth over a longer timeframe (20-30 years). When preparing the SDS, which is the spatial investment framework for Essex, it is important to recognise the existing growth planned in emerging Local Plans. It is anticipated the SDS will formally commence preparation later in 2026 once Regulations to support the PIA have been approved.

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- 1.8 ECC will contribute cooperatively to the preparation of a new Rochford Local Plan, particularly within the following broad subject areas,
- ECC assets and services. Where relevant, advice on current status of assets and services and the likely impact and implications of proposals in emerging Local Plans for the future operation and delivery of ECC services (or any future local government authority).
 - Evidence base. Guidance with assembly and interpretation of the evidence base both for strategic/cross-boundary projects, for example, education provision and transport studies and modelling.
 - Sub-regional and broader context. Assistance with identification of relevant information and its fit with broader strategic initiatives; and assessments of how emerging proposals for the city may impact on areas beyond and vice-versa.
 - Policy development. Contributions on the relationship of the evidence base to structure and content of emerging policies and proposals.
 - Inter-relationship between Local Plans. Including the Essex Minerals Local Plan and Essex and Southend-on-Sea Waste Local Plan.
- 1.9 It is important that ECC continues to work closely with RDC so that local plan preparation can progress to the Regulation 19 stage and then through examination under the current plan-making system, where local plans need to be submitted for examination by December 2026, otherwise new procedures will apply. It is expected that RDC will continue to engage ECC, and that new and updated evidence from RDC will continue to be reviewed in relation to strategic and cross boundary matters such as transportation, education, minerals and waste, flood and water management, climate change and net zero carbon, specialist and supported housing, green and blue infrastructure, and economic needs to inform the Regulation 19 Pre-Submission Plan.

2 Duty to Co-operate - specifics

- 2.1 The ECC response to the Rochford Local Plan – Regulation 18 (the Draft Local Plan) is seeking to support RDC undertaking a review of the adopted Local Development Framework and prepare an up-to-date Local Plan in accordance with the NPPF (2024). ECC will continue the on-going engagement with RDC, through the Duty (or any replacement), to progress the Local Plan to Regulation 19 (the Pre-Submission Plan), particularly with regards the strategic and cross boundary implications, including cumulative issues and opportunities arising from growth to ensure that the infrastructure requirements are identified, quantified, costed and phased where appropriate. ECC service areas have clearly outlined where further collaborative work/assessment needs to be undertaken (e.g. education provision and ongoing transportation modelling) to refine and resolve any issue; and ECC will continue to be engaged.
- 2.2 ECC officers have and will continue to work closely with RDC through the Duty (or any replacement process) to refine and progress preparation of the emerging Local Plan and the supporting evidence required, to continue to work collaboratively on strategic and cross boundary issues (including engagement and co-operation with other organisations for which those issues may have relevance), and to ensure ECC is able to assist in the viable delivery of key services and the provision of infrastructure arising from planned growth within Rochford; whilst securing necessary funding. Key ECC activities to date are outlined below.
- Issues and Options (2017 2018) and Spatial Options (2021 – ECC responded to the consultations.
 - Attended various Duty meetings with RDC regarding ECC roles and responsibilities and strategic cross boundary matters covering transport, education, climate change, minerals and waste, Public Health, surface water management and SuDS, and net zero development (EPOA Greater Essex best practice model policies).

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- Highways and transportation – RDC have commissioned consultants undertake the transportation modelling for the new Local Plan. ECC and RDC commissioned and prepared an LCWIP published in 2025.
- Education - undertaken an education scenario assessment (primary, secondary, early years and childcare, SEND) of necessary sites considered by RDC for the assessment. The initial assessment was supplied to RDC in August 2025, and the information resubmitted as part of this consultation response.
- Minerals and waste - as MWPA, ECC has provided a response to the draft Local Plan that seeks to ensure the Site Assessment Methodology be amended to ensure that Minerals and Waste matters are taken into consideration in determining the suitability of identified sites. Attention is also given to previously supplied site assessments from 2021.
- Health and wellbeing – ECC broadly support the approach outlined within the draft Local Plan, and particularly the reference in policy to Health Impact Assessments (HIA). Recommendations are made to strengthen the policy and supporting text, for instance including policy requirements and justification for the appropriate locational considerations for hot food take aways consistent with the NPPF (2024).
- Net zero - ECC through the Climate and Planning Unit (CaPU) and the EPOA has led the preparation of evidence (including legal justification), drafted policy wording and its justification for inclusion in local plans across Greater Essex. ECC has provided recommendations to ensure the emerging policies within the draft Local Plan reflect the work with Greater Essex. The policies and reference to the evidence must be updated to reflect the most current version which was updated following the Uttlesford Local Plan examination hearings in June 2025, where the policies were found sound.
- Infrastructure Delivery Plan – ECC provided appropriate and proportionate inputs for the IDPs preparation prior to its publication. As part of the response to the draft Local Plan, ECC have further reviewed the IDP and provided comments to shape the future IDP, where content will need to reflect the preferred spatial strategy and site allocations. RDC should reflect these views in the final IDP that will support the Pre-Submission Plan. It is important to note the scale of some of the identified sites, and the potential need for significant infrastructure to support the future communities. The nature of the delivery strategies and mechanisms must be considered.
- BNG - progressed the implementation of mandatory BNG and Essex LNRS through the Local Nature Partnership, for which ECC is the responsible authority, and appropriately reflecting the LNRS in the Draft Local Plan.

2.3 It is recommended that as plan preparation continues the following strategic and cross boundary issues are reflected in evidence and the Pre-Submission Plan, where more detail is provided under respective headings in this CMA.

- The assessment of the preferred strategic site allocations as a whole not just individually is needed, and this should consider overall requirements where larger and strategic sites are grouped together, to support effective delivery of the transport vision with transport evidence and mitigation in that context. Sites must be fully assessed and comply with ECC transport policies, guidance and should have regard to the wider transport impacts arising from planned growth in South Essex.
- Growth implications on the strategic road network with options explored with ECC as the Transportation and Highways Authority, south Essex authorities and strategic partners.

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- The lead authority for Education identified education provision is required for the planned level of growth in the local plan. ECC identify the need for cross boundary engagement with BC in respect of proposed development around Wickford and on the Rochford/Essex boundary with Southend City Council, and with neighbouring authorities in South Essex, for new SEND provision to ensure a strategic approach.

2.4 ECC will continue working with RDC as it prepares its Pre-Submission Plan. ECC acknowledges that the draft Local Plan at Regulation 18 stage does not include a preferred spatial strategy and/or the site allocations to deliver a specific growth strategy. It is appreciated that RDC require significant work to assess the sites using the Site Assessment Methodology outlined in the draft Local Plan, the need for engagement with ECC assist in the assessment and provide an appreciation of the infrastructure required to support a yet to be determined spatial strategy.

2.5 ECC understands that the Duty to Cooperate is not a duty to ‘agree’, regular and ongoing officer meetings (and potentially at specific times with Members) need to continue to ensure all ECC representations made to this Draft Local Plan, and all strategic and cross boundary matters are discussed and resolved as plan preparation progresses. This will be documented through a SoCG. It is essential that Duty (or any replacement) discussions remain strong and ongoing and RDC fully engage ECC to identify and quantify infrastructure and service provision requirements because of the preferred spatial approach given the amount of growth arising in RDC and neighbouring authorities such as Southend City Council, Chelmsford City Council, Basildon District Council and Castle Point District Council.

2.6 Infrastructure Delivery

2.7 It is imperative that all new development is supported by the required local and strategic infrastructure. A Local Plan must be supported by an Infrastructure Delivery Plan (IDP) that reflects up to date costings, aligned with development phasing, and such requirements are appropriately reflected in the local plan and its site allocations policies. As noted in paragraph 4.4.2 of the draft Local Plan, RDC has prepared an IDP (a precursor to the full IDP), which ECC has provided appropriate and proportionate inputs for its preparation prior to its publication. ECC have also reviewed the current version that has been published as evidence to inform this stage of plan preparation. A response is provided within appendix 4.

2.8 Following this consultation, RDC will prepare a full IDP, which will support the preparation of the Pre-Submission Plan. This must involve ECC in our role as an infrastructure and service provider and funder and assess individual and cumulative impacts. The work will be used to further develop the Draft Local Plan’s policies and inform policy attributed to the final spatial development approach. The updated IDP will ensure all policies include relevant site-specific infrastructure requirements to meet future growth needs.

2.9 The IDP is a ‘living’ document, where assessments of costs, funding, delivery and phasing will continue to be updated, in conjunction with further work being undertaken with site promoters, ECC and funding partners. This ongoing review can ensure the best and most up-to-date information is available, particularly to inform any subsequent planning application process. The initial cost estimates / projections for infrastructure will also need to take account of indexation between the date of the IDP and when infrastructure delivery occurs. If this is not undertaken then certain schemes may be subject to a funding gap, and RDC and/or ECC should not be expected to fund any shortfall.

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- 2.10 The ECC response is seeking to support that draft policy MG1 entitled ‘Spatial Strategy’ is seeking to deliver an infrastructure-led approach to future growth within RDC. Within the response ECC notes that the approach is consistent with provisions set out within the NPPF (2024) with particular attention drawn to paragraphs 16, 20, 22, and 77. These NPPF paragraphs collectively demonstrate the delivery of sustainable development and the importance of aligning infrastructure both existing and future to proposed growth and development. ECC recommends that for the effective delivery and clarity in the implementation of this approach to development it is essential the draft Local Plan sets out a clear definition for infrastructure – within the Glossary and referenced throughout the draft Local Plan. The ECC response seeks to assist RDC in defining infrastructure with attention drawn to the ECC Developers’ Guide to Infrastructure Contributions (2025) and the HM Treasury UK Infrastructure: A 10 Year Strategy (2025).
- 2.11 The ECC response also highlights a further issue with the definitions for infrastructure in relation to policy MG4 entitled Developer Contributions. Clearly defining the infrastructure is essential for ensuring that the developer contributions are sought to reflect the infrastructure required. ECC’s response highlights the following omissions –
- Supported and specialist housing and accommodation – is not referenced and the response recommends the delivery mechanisms, triggers, land requirements or costing for such provision be set out. Providing reference to relevant evidence to inform this amendment.
 - Waste/Waste Disposal – with reference to the ECC Developers’ Guide and the appropriate references that must be included.
 - Early Years and Child Care and Education – need to ensure that this is defined (matter further elaborated in paragraphs 5.16 and 5.17 of the CMA); and
 - Cumulative impacts – also ensure that cumulative infrastructure needs are addressed.
- 2.12 Education (including early years and childcare; primary, secondary and SEND)**
- 2.13 ECC acting as the appropriate lead authority for education, has worked collaboratively with RDC in identifying potential school place planning issues arising from the draft Local Plan. ECC completed and provided RDC with a scenario test (dated August 2025), this test identified the impact of planned Local Plan growth on existing education facilities and identified the need for any new, primary, secondary, early years and childcare facilities, and Special Education Needs (SEND) requirements. The scenario test supplied to RDC was consistent with the guidance set out within ECC’s ‘Local and Neighbourhood Planners’ Guide to School Organisation’.
- 2.14 The ECC response acknowledges that the draft Local Plan does not provide an appreciation of the preferred spatial approach for development and growth, which RDC has yet to agree. Within Chapter 12 entitled ‘Exploring Growth Opportunities’ the draft Local Plan outlines identified sites for further testing. The ECC response recommends that RDC undertake an Education Needs Assessment that complies with the guidance set by ECC for school organisation, to ensure the preferred spatial approach is developed to meet the future educational needs (inclusive of Early Years and Child Care, Primary and Secondary and SEND). The response also aims to ensure that cross boundary implications are considered, depending on the nature of the preferred spatial approach adopted by RDC, and working with relevant cross boundary authorities (SCC and BDC), to ensure that future growth and educational needs are addressed.

2.15 Highways and Transportation

- 2.16 ECC's response acknowledges that SYSTRA has been appointed by RDC to provide transportation and highways advice in relation to the development of the draft Local Plan. As part of the draft Local Plan consultation, RDC has published the Regulation 18 Transport Assessment; with an intention to build an understanding of existing transport conditions, opportunities and challenges, and set out how future changes to transport demand are expected to affect the capacity and operation of transport infrastructure and services having full regard to the preferred spatial strategy and site allocations chosen by RDC.
- 2.17 To assist RDC in the response to the draft Local Plan, ECC as the Highway Authority has reviewed the Transport Assessment and provided a summary of the matters that must be addressed. In summary the response highlights that to ensure a robust transport assessment is prepared for the Regulation 19 Local Plan additional and focussed work must be carried out, to reflect paragraph 5.21 below.
- 2.18 As the Highway and Transportation Authority, ECC emphasises the importance of continued engagement as RDC move towards the Regulation 19 stage of the Local Plan preparation. It is acknowledged that RDC are committed to developing the transport evidence. The timescales that RDC are working and operating to are appreciated but extremely tight and ambitious. ECC also acknowledge that discussions are ongoing to inform the Regulation 19 Local Plan Transport Assessment. With this in mind RDC will need to review and action the detailed comments on the Regulation 18 Transport Assessment, to ensure that matters raised are addressed, as part of the next stage of the Local Plan. ECC are committed to work with and assist RDC to ensure that a robust and sound transport evidence base is prepared and submitted.
- 2.19 ECC conclude that for the Regulation 19 Local Plan the Transport Assessment requires further refinement, and consideration must be given to -
- Appreciate, and identify the spatial distribution and cumulative growth impacts from proposed allocations both within the district and the cross-boundary transport implications such as for land North of Southend and around Wickford (not exhaustive).
 - Ensure that strategic transport implications from proposed growth are known, identified and mitigation associated with development proposals highlighted - Examples of likely strategic transport matters include the A127, A13, A130 including A127/A130 Fairglen Interchange (strategic transport corridors) or Sadlers Farm Roundabout, and barriers to north south connectivity (not exhaustive).
 - Ensure an awareness of the specific sites (and where appropriate the cumulative site implications) and their impacts on the networks within RDC and cross boundary to ensure the Regulation 19 Local Plan sets clear, viable transport mitigation attributed to relevant sites.
 - Ensure the ECC have the opportunity to continue to review and advise on the transport modelling and assessment process for the preferred site allocations and how this relates to the South Essex model and modelling for adjacent authorities.
 - Ensure ECC have the opportunity to be engaged and inform the proposed modal strategies for active modes (walking and cycling), public transport, and the highway network more generally (including freight). As well as the large strategic site high level transport strategies referenced within the Regulation 18 Transport Assessment.
 - Appreciate the spatial implications of growth for economic sites, future physical and social infrastructure and their implications on and for the transport network.

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2.20 This list is not exhaustive and highlights the need for RDC ongoing engagement with ECC as the Highway and Transportation Authority, to ensure that the transport evidence supporting the emerging Local Plan is robust, effective, deliverable and sound.

2.21 The ECC response also seeks to strengthen the opportunity for providing transport mitigation, highlighting where the emerging Local Plan must reference ECC and other relevant policy guidance. This will allow future impacts to be assessed appropriately and the relevant mitigation to support the future growth and development in the area.

2.22 London Southend Airport

2.23 ECC response proposes amendments to policy EC7 entitled Southend Airport, to enhance the clarity and ensure referencing is effective. Furthermore, it also welcomes reference to the vision of developing London Southend airport as a multi modal transport hub. It is acknowledged that Government recognises the role that airports play as multi modal transport hubs. It is therefore important that emerging Local Plans policy seeks to support this. ECC welcome this reference within the draft Local Plan.

2.24 ECC appreciate that developing the Essex airport (Southend and Stansted) as multi modal transport hubs, benefit the local community. Setting a vision where future growth within and around the airport will enhance connectivity and accessibility to the airport and its environs, providing quality, reliable and a choice of transportation infrastructure and in particular the delivery of sustainable and active travel modes.

2.25 ECC response also highlights that any improvement of the bus rail interchange may involve land to the east of the Southend Airport station. This land is currently Green Belt (MG2). So, any work undertaken to address this would need to consider Green Belt policy. Attention is drawn to chapter 13 of the NPPF to ensure consideration is given to the requirements for any release of Green Belt land.

2.26 ECC response also draws attention to the Uttlesford District Council Inspectors Report dated 16 January 2026, where they supported a main modification to the Uttlesford Local Plan and the inclusion of a policy for ‘Aerodrome and Military Safeguarding’. This policy wording was proposed by London Stansted Airport operators Manchester Airport Group (MAG), and the precise wording agreed by the inspectors. It was deemed that the policy provided greater clarity and effectiveness; which may be helpful in a re-draft of this policy.

2.27 ECC also recommends amendments to the policy to ensure there is full consideration given to noise management and operating restrictions that must be set out when considering any future air transport movements, or changes in the operations at the airport. Attention is drawn to the Department for Transport - Aviation Policy Framework which emphasises that “land-use planning and management is one of the elements of the ICAO balanced approach which should be explored when tackling noise problems at an airport” (Para 3.20). Similarly, the NPPF also seeks to ensure that planning policies “preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability” (Para 187).

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2.28 Finally, ECC draws attention to the International Civil Aviation Organization Balanced Approach to aircraft noise management, which should be considered by RDC. This was developed to provide all nations – including the UK with a coherent approach to address aircraft noise.

2.29 ECC's response seeks a reference to operating restrictions – specifically to control over hours of operation – and highlights that ECC is mindful that of local community concern is any changes to night operations. Attention is also drawn to night operating restrictions at London City airport, with these seeking to mitigate impacts on the local community for increasing throughput at the airport.

2.30 Minerals and Waste

2.31 The MWPA in responding to the draft Local Plan highlighted where specific amendments are required to the draft Local Plan to ensure conformity with the Essex Minerals Local Plan and the Essex and Southend-on-Sea Waste Local Plan. Furthermore, it provides an appreciation of where further liaison with the MWPA is required to address minerals and waste matters given proximity to minerals and waste sites. The ECC response is seeking to ensure that the requirements for a Mineral Resources Assessment and Minerals and Waste Infrastructure Impact Assessments be undertaken to prevent the sterilisation of proven mineral reserves and secure the safe and efficient operation of safeguarded mineral or waste sites.

2.32 The MWPA notes that within Chapter 12 of the draft Local Plan there is reference to the Site Assessment Methodology paper (SAM), that forms part of the evidence to support the draft Local Plan. The SAM methodology will need to be revised to ensure minerals and waste matters are considered and reviewed as part of any site selection process. These matters are currently omitted. The information is supplied with the response and available in appendix 3 of the response.

2.33 Economic Growth

2.34 ECC's response recommends RDC explore opportunities for the provision of more mixed-use development as a basis to identify and supply employment land to meet local employment needs. The adoption of this approach is consistent with the NPPF to align housing growth and local employment needs and the need to include infrastructure delivery strategies and mechanisms. The ECC response also recommends welcoming policy EC2 that makes specific reference to B8 uses. However, amendments are sought to ensure a more positive approach to the delivery of B8 uses is adopted.

2.35 ECC notes the reference to the Employment Allocations Topic Paper, and welcomes working with RDC to inform this paper to ensure the employment land delivered within the plan period meets joint objectives for RDC and ECC.

2.36 Climate Change and Net Zero Development

2.37 ECC welcomes the inclusion of Policy SC2: Operational Energy and Carbon (Net Zero) In Homes and Buildings, which broadly reflects the updated Operational Energy & Carbon (Net Zero) Planning Policy Statement - October 2025 that is supported by the technical and legal evidence base collaboratively prepared by the local authorities of Greater Essex.

2.38 Furthermore, ECC welcomes the inclusion of Policy SC3: Embodied Carbon and Circular Economy in Homes and Buildings, which broadly reflects the updated Embodied Carbon and Circular Economy Planning Policy Statement (October 2025) that is supported by the technical and legal evidence base collaboratively prepared by the local authorities of Greater Essex.

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2.39 The ECC's response also sets out some minor amendments to policy and/or supporting text to ensure clarity and the correct referencing for evidence produced with the local authorities of Greater Essex. Amendments and additions to policy are also sought to strengthen their effectiveness, for instance ECC recommends that any expectation to achieve BREEAM standards be clearly outlined in policy to secure delivery and define which development typologies are affected.

2.40 BNG and Green and Blue Infrastructure (GBI)

2.41 ECC provides support for the policy proposals that are seeking the protection for designated and locally important habitats, including Local Wildlife Sites, application of the mitigation hierarchy, and recognition of ecosystem services. ECC also supports reference to the mandatory 10% Biodiversity Net Gain (BHG), 30-year maintenance and Essex Local Nature Recovery Strategy (LNRS)-led hierarchy. Further support is also provided for the protection of ancient and veteran trees and the requirements for the use of native species for planting.

2.42 ECC's response also recommends strengthening of some policies with highlighting where further reference to the LNRS. Proposals should also demonstrate how they contribute to LNRS priorities and Nature Recovery Network connectivity. Further policy strengthening is also set out to ensure that cross boundary Green Infrastructure networks are considered, consistent with the guidance set out in the South Essex Strategic Green and Blue Infrastructure Study.

2.43 Flood and Surface Water Management

2.44 ECC as the LLFA notes the inclusion of policy NE9 – Surface Drainage that ensures surface water management and drainage considerations are given for all developments. Amendments are recommended to aid effective delivery and compliance with national policy and ensure consideration is given to Green and Blue Infrastructure and the multifunctional features that may be provided. As a statutory consultee on surface water, the LLFA will require that all new developments must implement the Essex SuDS Design Guide and GI Standards to ensure they do not add pressure to existing sewerage systems or negatively impact the ecological status of waterbodies. The LLFA, should be consulted on the scoping of Flood Risk Assessments and input to relevant site SuDS strategies.

2.45 Water Efficiency Water Supply

2.46 The inclusion of the Shared Standards in Water Efficiency for Local Plans report set out within the 'Context' section of policy NE10 – Water Quality is strongly supported, as is the adoption of its 85 l/p/d target for new homes. It is suggested that other model policies from the 'Draft policy: Water Resources and Sustainable Growth' of the Shared Standards report be included within policy NE10, to ensure the most comprehensive and ambitious approach to improving water efficiency is delivered.

2.47 ECC's response notes that the standards for non-residential buildings set by the 'Shared Standards' are more stringent than those in Policy NE10. The response provides an appreciation of where amendments can be made to strengthen the policy and delivery better water efficiency. It also sets out the evidence that may be used by RDC to support the requirements, as well as the feasibility and viability.

2.48 The response also sets out how the 'Shared Standards' provide recommendations on how to demonstrate compliance, through the submission of a Water Efficient Design Statement. It is encouraged that similar clauses be included in Policy NE10 to provide more clarity to both policy

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officers and developers on the information that must be submitted to confirm that the policy has been met.

2.49 Specialist and Supported Housing (including Adult Social Care)

2.50 ECC notes that policy within the draft Local Plan is seeking inclusive design; however, amendments are recommended to ensure there is explicit reference to dementia inclusive design or environments that support older people and people with disabilities, including people with cognitive or sensory impairments.

2.51 The ECC response aims to ensure reference is made to existing evidence to inform the emerging draft Local Plan, including ECC's Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025), that identifies the population groups in Rochford who have specific access, sensory and cognitive needs that must be reflected in high quality, accessible and inclusive design. Amendments are also recommended to ensure reference is given to the Essex Design Guide, as well as ECC design guidance, including the Environments for Ageing and Dementia Design Assessment Toolkit (EADDAT, 2024), the ECC Extra Care Design Guide (2023), or the ECC Supported Living Accommodation Standards (Adults with Disabilities, 2024), all of which are essential to securing high quality and inclusive specialist accommodation.

2.52 Health and Wellbeing

2.53 ECC and as the lead advisor for Public Health, welcomes and supports policy MG3, demonstrating the importance placed on the health and well-being of existing and future RDC community, and its focus on HIAs. ECC is seeking amendments to further strengthen the policy and its delivery within RDC.

2.54 It should also be noted that ECC Spatial Planning and Public Health teams have developed a programme to support local public health practitioners in the borough, city and district councils by working with planning policy and development management officers on the use of HIAs including monitoring their delivery and effectiveness.

2.55 ECC's also seeks to ensure that policy allows for the provision of hot food takeaways in appropriate locations. With the response highlighting relevant evidence and justification to support a revised policy. It also assists RDC by indicating other relevant Local Planning Authorities within and outside Essex that have adopted an effective policy.

2.56 Large-Scale Allocations and Stewardship

2.57 ECC notes that the draft Local Plan consultation is not seeking to allocate sites (as outlined in paragraph 12.1.2). In reviewing chapter 9 entitled "Homes for a Growing Community" it is notable that there is no consideration for the larger sites. ECC's response therefore recommends that following an appreciation of the larger scale sites that will be allocated within the emerging Local Plan, RDC must set out within policy(s) the approach to be taken for the delivery of the larger scale developments that may form an important element of the spatial strategy.

2.58 Attention is drawn to NPPF (2024) paragraph 77 to assist in developing the policy(s). ECC consider that there is an opportunity to adopt a different housing mix and include other matters such stewardship.

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2.59 ECC recognise the benefits of establishing a robust and sustainable stewardship structure early in the planning and delivery process for large scale strategic sites. An infrastructure delivery organisation, ECC has a critical interest in the design and delivery of successful stewardship arrangements in new developments, particularly garden communities and villages. ECC and RDC statutory roles and responsibilities all interact with stewardship arrangements in some form and as such early engagement with ECC is necessary to complement proposals for more localised management of relevant assets and services by stewardship bodies. Additional policy requirements should require stewardship activities to be in place for the first housing occupations to ensure timely delivery of community development activities and for an Asset Schedule to be prepared by applicants with the express agreement of RDC and ECC.

2.60 ECC also recommends that the policy must include reference and be informed by the following guidance/policy –

- ECC Developers’ Guide for Infrastructure Contributions,
- the ECC Local and Neighbourhood Planners’ Guide to School Organisation and Place Planning,
- relevant sections of the Essex Design Guide, and
- the Essex Planning Officers’ Association Parking Guidance Part 2 for Garden Communities and Large-Scale Developments.

2.61 Large Scale Sites and Cross Boundary Implications

2.62 ECC consider the identification of land for development in the vicinity of Land North of Southend (site reference CFS260) as a strategic cross boundary matter and engagement with RDC, SCC and ECC must be sought to explore the potential development under the Duty to Cooperate (or any other similar process).

2.63 ECC’s comments on this site, draw attention to our views seeking a strategic large scale site allocation policy (as discussed in paras 5.49 – 5.51 of the CMA). ECC’s views emphasise the necessity of considering cumulative growth proposed across both areas (and surrounds) and the implications on infrastructure and services requirements; with the needs defined and mitigated through a co-ordinated plan led approach. ECC views are also mindful of the respective local plan policy approach that may be adopted by SCC, as well as the need to coordinate evidence and infrastructure and service requirements, to ensure the development is viable and deliverable. ECC’s views highlights matters for consideration in such a large-scale allocation. The ECC response also sets out similar comments with regards to the site Land West of Rayleigh – Dollymans Farm (site reference – CFS222(a)). These sites are referred to as examples, but the ECC’s response is mindful that RDC are yet to set out a preferred spatial approach for development, therefore the matters are of a concern for other larger scale sites that may be proposed at the Regulation 19 stage of the Local Plan.

2.64 Digital Connectivity

2.65 ECC’s response aims to ensure that the most up to date information for broadband connectivity is used throughout the emerging Local Plan. As data is now available from Think Broadband (2026).

Table 1: ECC Response to Rochford Draft Local Plan Regulation 18 Consultation, February 2026 (response dated 19 March 2026)

In addition to the comments provided above, please refer to detailed comments below.

ECC Representation Reference	Document Ref	Comments/Recommended Changes and Additions
ROCHFORD LOCAL PLAN 2023 -2043 Regulation 18.3		
SECTION A – OUR STORY AND AMBITION – Chapter 1 – Introduction		
ECCREP_01	Paragraph 1.2.6	<p><u>Statutory Development Plan - Minerals and Waste Planning</u></p> <p>ECC as the Minerals and Waste Planning Authority (MWPA) supports reference to the Minerals and Waste Local Plans. However, it is recommended that further clarity be given to ensure their role as forming part of the Local Development Plan for Rochford, is fully appreciated and articulated within the emerging Local Plan. These Plans are a material consideration in planning decisions to inform local plan preparation and the determination of non-minerals and waste related developments.</p> <p>ECC recommends that the Draft Local Plan be amended to -</p> <p><u>The statutory development plan for Rochford also includes the Essex Minerals Local Plan (2014) and Essex and Southend-on-Sea Waste Local Plan (2017).</u></p> <p>It is also important to note that once adopted, the Rochford Local Plan Policies Map should include the mapping layers for Mineral Safeguarding Areas (MSAs). The Policies Map should not include the specific MLP or WLP site allocations nor the Mineral Consultation Areas (MCAs) and Waste Consultation Areas (WCAs), which are subject to change and the most up to date list can be found on the ECC website.</p> <p>ECC request that LPA websites, Local Validation Checklists and internal GIS site constraints layers include the MLP policies (S4, S5, S8, & S9) and WLP policies (2 and 4) recognising that the MLP and WLP form part of the statutory Development Plan and are a material consideration before making any planning decisions.</p>
SECTION A – OUR STORY AND AMBITION – Chapter 2 Profile of Rochford		
ECCREP_02	Section 2 – Profile	<p><u>Household Waste and Recycling</u></p> <p>ECC recommends that section 2 be enhanced to include reference to household waste and recycling services. The proposed wording is –</p> <ul style="list-style-type: none"> • <u>“Essex County Council are the Waste disposal Authority, and all 12 district, borough, and city councils in Essex, including Rochford District Council, are the Waste Collection Authorities. Together they make up the Essex Waste Partnership and</u>

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		<u><i>have jointly adopted the Waste Strategy for Essex 2024-2054. This sets out a joint framework to transition to a circular economy, aiming to reduce, reuse, and recycle more to protect the environment”.</i></u>
ECCREP_03	Paragraph 5.1.15 (also applicable to para 2.1.15)	<p><u>Up to Date Information – High-Speed Broadband</u></p> <p>ECC recommends that updating the referencing to Think Broadband (2026), as there is more up to date information, that must be quoted within this paragraph. ECC recommends the paragraph be amended to read –</p> <ul style="list-style-type: none"> • <u><i>“High-speed broadband coverage is extensive. As of early 2026, approximately 99.6% of premises had access to superfast broadband (30 Mbps or faster), and around 89.0% had access to full-fibre (gigabit capable) broadband.”</i></u>
SECTION A – OUR STORY AND AMBITION – Chapter 3 – Vision and Strategic Objectives		
ECCREP_04	Chapter 3, Para 3.1.2, 3.1.7, 3.1.8 (Pages 15 – 17)	<p><u>Biodiversity and the Vision</u></p> <p>ECC supports the vision’s recognition that Rochford is a “<i>nature-rich landscape</i>”. It is noted that the “<i>Our Environment</i>” vision appreciates the role and impact of the Essex Wide Local Nature Recovery Strategy (LNRS) as it has “<i>allowed landowners, developers and stakeholders to enhance habitats and biodiversity across the district</i>” (Para 3.1.8). ECC also welcomes that the “<i>Our Community</i>” and “<i>Our Environment</i>” visions reference green infrastructure and green space network by promoting the central role of accessible open spaces and LNRS-led enhancements.</p>
ECCREP_05	Chapter 3 SO3, SO8, SO11, SO14	<p><u>Strategic Objectives and Biodiversity</u></p> <p>ECC notes there is no specific reference to green infrastructure in all 14 strategic objectives. It is welcomed that objective reference SO3 – Supporting Rural Diversification - aims to be respectful of the natural environment. It is supported that SO8 – Responding to Climate Change - references the use of natural resources, and SO11 – Protecting and Enhancing our Natural Environment - aims to protect, conserve and enhance natural capital, biodiversity, and ecological networks while supporting LNRS objectives.</p> <p>ECC is not seeking Fany specific amendments to the strategic objectives. However, ECC is proposing amendments to the Draft Local Plan to strengthen the delivery of measurable, consistent Green Infrastructure (GI) outcomes across all scales of development. The amendments aim to enhance the opportunity and role for <i>multifunctional GI</i> as a delivery mechanism/golden thread for GI throughout the Local Plan. The amendments proposed by ECC relate to the following strategic objectives –</p> <ul style="list-style-type: none"> • SO5 – Delivery of Infrastructure, • SO8 – Responding to Climate Change, • SO11 – Protecting and Enhancing the Historic Environment, and • SO14 – Managing Water.

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ECCREP_06	SO6	<p><u>Promoting Active Travel Modes</u></p> <p>ECC recommends that the ‘Sustainable Transport Provision’ strategic objective be amended to include reference to ‘active travel modes’ and ‘minimising car travel’. These amendments are consistent with NPPF (2024). Attention is drawn to paragraph 109 of the NPPF that’s highlights the role that plan making can make in using a vision-led approach to identify transport solutions with specific reference to “identifying and pursuing opportunities to promote walking, cycling and public transport use” (NPPF, 2024, para 109). To strengthen this approach to tackling transport solutions ECC recommends the wording of SO6 be amended to read –</p> <ul style="list-style-type: none"> • <i>“Support the identification, delivery and protection of sustainable transport <u>and active travel</u> corridors, facilities and funding which will <u>minimise the need for car travel and enable district residents to undertake most local journeys by walking, cycling or public transport</u>”.</i>
ECCREP_07	SO8	<p><u>Waste and Recycling</u></p> <p>ECC notes that SO8 is the principle strategic objective to address matters in relation to climate change. However, it fails to include reference to resources or waste. ECC recommends it be amended to include the following statement – <i>“Maximise resource efficiency to deliver a circular economy”.</i></p>
ECCREP_08	SO13	<p><u>High Quality Design – Strengthening Objective</u></p> <p>ECC recommends that SO13 be strengthened to incorporate –</p> <ul style="list-style-type: none"> - Ensure buildings and public open spaces are designed to be of a high quality, safe, attractive, and sustainable. - State the benefit/purpose of high-quality design; improving the quality of life for residents of all ages, abilities and genders. - Respond sensitively to local context but also promote opportunities for innovative and distinctive design and placemaking. - Includes reference to resources and waste. <p>Amending objective SO13 to ensures the points above are addressed ensures consistency with the NPPF (2024) and paragraph 135, which sets priorities for planning policies for developments.</p> <p>To be consistent with these priorities ECC recommends that SO13 be amended to –</p>

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		<p><i>“To ensure that all development is well-designed, <u>establishing a sense of place, through the creation of safe, inclusive and accessible, promoting health and well-being with a high standard of amenity and promoting community cohesion, resilience and material/resource efficiency</u>”.</i></p>
ECCREP_09	SO14	<p><u>Managing Water Objective – Need to Widen the Scope</u></p> <p>ECC seeks to ensure that this objective specifically references sustainable drainage. Given that sustainable drainage must be considered at the earliest opportunity in the planning process and early engagement with the Local Lead Flood Authority (LLFA) is crucial for effective flood risk management and to future proof developments against the impact of climate change. SuDS should be considered alongside plans for biodiversity and local amenity to ensure they are multi-functional areas that are included in the landscape strategy.</p> <p>Furthermore, it is important to note that brownfield sites that discharge surface water to the foul network should explore alternative discharge locations as discharge to the foul network will not be permitted. Developments must adhere to the standards in the Sustainable Drainage Systems Guide for Essex. About us Essex Design Guide and refer to the South Essex Surface Water Management Plans, South Essex (Inc. Rochford, Castle Point and Basildon) Essex Design Guide</p> <p>Attention is also given to Essex being defined as a severely water stressed area and the ECC Water Company Water Resource Management Plans (WRMPs) across Essex show that with population growth, climate change and environmental needs, water users and abstractors face uncertainty around water availability to 2050 unless planned changes in demand and supply are made. The Water Strategy for Essex makes recommendations which promote consideration of on-site water reuse and recycling as part of all new development. These measures support the Government's Environment Improvement Plan for clean and plentiful water and also support our commitment to Levelling Up the Environment in Essex. Water strategy for Essex 2024.</p>
<p>SECTION B – BUILDING A SUSTAINABLE FUTURE – Chapter 4 – Managing Growth</p>		
ECCREP_10	<p>MG1 – Spatial Strategy</p> <p>Page 25</p>	<p><u>Infrastructure Led Growth and Infrastructure Definition</u></p> <p>ECC supports that the draft policy MG1 noting the delivery of an infrastructure-led approach to future growth within RDC. This approach is consistent with provisions within the NPPF (2024) with attention drawn to paragraphs 16, 20, 22, and 77, that collectively demonstrate the delivery of sustainable development and the importance of aligning infrastructure both existing and future to proposed growth and development. ECC recommends that for the effective delivery and clarity in the</p>

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		<p>implementation of this approach to development it is essential the draft Local Plan sets out a clear definition for infrastructure – within the Glossary and referenced throughout the draft Local Plan.</p> <p>To assist in defining infrastructure attention is drawn to the ECC Developers’ Guide to Infrastructure Contributions (2025) and the HM Treasury UK Infrastructure: A 10 Year Strategy (2025).</p>
ECCREP_11	MG2 – Green Belt – Bullet 8	<p><u>Green Belt and Nature Recovery/ Green Infrastructure (GI)</u></p> <p>ECC welcomes the inclusion of measures to enhance the GI network, including improvements to landscape quality, accessibility and the delivery of biodiversity net gain within policy MG2 (bullet8).</p> <p>Whilst it is appreciated that the RDC Local Plan will be assessed using the NPPF 2024, it is noted that emerging NPPF reforms, emphasise that land within the Green Belt should contribute to maintaining openness and preventing urban sprawl, as well as supporting nature recovery. Similarly recent draft updates to national policy demonstrate a stronger focus on green infrastructure, biodiversity, and nature-based solutions within Green Belt and wider plan-making.</p> <p>For instance, where land is proposed for release from the Green Belt for major development, the emerging “golden rules” require that enhancements to green spaces actively support nature recovery and reflect Local Nature Recovery Strategy (LNRS) priorities. It is also important to note that LNRSs are a key part of the statutory evidence base, identifying spatial priorities for environmental enhancement and guiding where protection, restoration and habitat creation should be focused. With this in mind and strengthen the nature recovery element of this policy it is recommended that reference within bullet 8 also includes the LNRS.</p>
ECCREP_12	Green Belt: Policy MG2(7) Page 31	<p><u>Green Belt and Education Provision</u></p> <p>ECC is mindful that 74% of Rochford’s land area is designated as Metropolitan Green Belt. It is noted that the draft Local Plan highlights there will be a need to “<i>look at the green belt as a potential option to help meet our (RDC) development needs over the plan period</i>” (Para 4.2.4). In providing for the future community and development needs within Rochford, ECC are mindful that consideration must be given to the expansion of school(s) and other education projects within the Green Belt.</p> <p>It is appreciated that the draft Local Plan strategic policy MG2 includes paragraph 7 which sets out provisions for the release of Green Belt for non-residential development. However, ECC are mindful that the NPPF states that “<i>Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans</i>” (paragraph 145, 2024).</p>

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		<p>ECC also draws attention to the Essex County Council Local and Neighbourhood Planners’ Guide to School Organisation and Place Planning (2025) (the ‘Guide’). This Guide aims to provide Local Planning Authorities (LPAs) and Neighbourhood Steering Groups with an appreciation of the matters to consider ensuring the delivery of sufficient school places to support new development planned within emerging Local Plans/neighbourhood plans.</p> <p>The Guide highlights that “where new school sites, or schools that could require expansion, are located within the ‘green belt’ (NPPF - see paragraphs 142-160) the Local Plan process must redesignate the land to ensure the necessary new infrastructure can be delivered. Because school place planning is not a precise science LPAs are asked to work on a precautionary basis to maximise the flexibility afforded to potential school project options (Para 4.1).</p> <p>ECC recommends that the draft Local Plan must provide clarity around education and early years and childcare land, avoiding the need to demonstrating ‘very special circumstances’ each time a project is proposed.</p> <p>ECC is mindful that RDC are preparing the emerging Local Plan using the existing 2024 NPPF. Within the new NPPF the notion of ‘Grey Belt’ is introduced. This is likely to assist where structures are being replaced but application of this concept to outdoor space it less clear-cut. Setting out a local perspective, in the Plan, would assist. Note: there is a strong presumption against the loss of playing pitches. Removing them from the Green Belt does not risk them being built on but may allow enhancements, such as artificial surfaces, which could benefit the community.</p>
ECCREP_13	MG3 – Health Impact Assessments	<p><u>Health Impact Assessment</u></p> <p>ECC and as the lead advisor for Public Health, welcomes and supports MG3, demonstrating the importance placed on the health and well-being of existing and future RDC community. ECC is seeking amendments to further strengthen the policy and its delivery within RDC.</p> <p>ECC seeks an amendment to bullet 3a) to ensure that the policy ensures the Health Impact Assessments is completed prior to commencement.</p> <ul style="list-style-type: none"> In the Reasoned Justification paragraphs ECC notes and welcomes that reference is made to the Essex Design Guide, Healthy Places Guidance and the Essex Joint Health and Wellbeing Strategy. It is however noted that the Reasoned Justification text does not include reference to the Essex Joint Strategic Needs Assessment, this must be included and the draft Local Plan amended.

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		<p>ECC also recommends that the Reasoned Justification paragraphs must include reference the Health Impact Assessment checklist endorsed by the Essex Planning Officers Association (EPOA), as well as the ECC Developers Guide to Infrastructure Contributions (Revised 2024) with attention drawn to public health matters included in section 6.6.</p> <p>Furthermore, the Reasoned Justification text must reference undertaking a Health Impact Assessment be set out in the Local Validation List.</p>
ECCREP_14	MG3 – health Impact Assessments	<p><u>Health and Hot Food Take Aways</u></p> <p>ECC welcomes the reference to hot food take aways and the application of the Health Impact Assessment. However, ECC recommends there must be further detail set out to justify the policy, as well as set out within the policy. The ECC Public Health Practitioner/Officer can provide support on this matter and would welcome working with UDC to provide guidance and a steer on producing a sound policy.</p> <p>The National Government’s Strategy for Obesity and the Office for Health Improvement and Disparities highlight the importance of planning healthier weight environments and the NPPF (2024) is clear that planning has an important role in creating healthy communities and supporting well-being. Locally, the UDC Health and Wellbeing Strategy and county-wide strategies both place an emphasises on the significance of excess weight in relation to health and the wider determinants that contribute to obesity. Furter information should be presented in the policy to ensure that it is more effective.</p> <p>The distance between schools and takeaways is an issue for Public Health to consider but school land allocations in sections 5 & 6 are described as in mixed use areas or shown diagrammatically as adjacent to local centres. This is likely to conflict with this policy.</p> <p>ECC recommends that reference to the most-up to date locally available Public Health data be used (obesity prevalence, deprivation etc). The Essex Open data may be utilised to access the Joint Strategic Needs Assessment and make use of the Food Environment Assessment Tool (FEAT) for data on food outlets at neighbourhood level.</p> <p>It is also recommended that further evidence on planning restrictions on fast food takeaways is referred to and adopt the PHE Healthy Weight Environments: using the planning system.</p>

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		<p>Consideration should be given to the location of new schools in relation to mixed use land and local centres to avoid conflicts with this policy.</p> <p>ECC acknowledge there are varying levels of success in adopting such a policy. However, there are several LPA’s (in the county and further afield) with examples Hot Food Takeaway policies that you can take into consideration including –</p> <ul style="list-style-type: none"> • Braintree Policy LPP 49; • Tower Hamlets; • Gateshead Council; • Rossendale Council; and • Uttlesford District Council (Submission Local Plan – scheduled to be adopted in March 2026) <p>Other considerations:</p> <ul style="list-style-type: none"> • Planning conditions can be used as a way to gain commitment to healthier takeaway by supporting local initiatives such as TuckIN – check in with your local Public Health Practitioner and Environmental Health Team • Determine over concentration of hot food takeaways (supported by PPG guidance as noted in the PHE guidance) • Proximity to schools/ youth facilities – boundary restrictions or restricting opening hours. • Proximity to residential properties – noise/disturbance/traffic (this can be picked up in a HIA) <p>Consideration will also need to be given to how this policy will be monitored and evaluated.</p>
ECCREP_15	MG4 – Infrastructure Contributions	<p><u>Supported and Specialist Housing – Social Infrastructure</u></p> <p>In reviewing policy MG4, ECC notes supported and specialist housing as infrastructure requiring delivery or contributions is not referenced. This omission risks under delivery of specialist accommodation and potentially failing to meet evidenced needs for such accommodation.</p> <p>ECC acknowledges that the Infrastructure Delivery Plan (IDP) notes some Adult Social Care related needs under ‘<i>Health and Wellbeing</i>’, including the need for retirement and extra care housing, however MG4 fails to identify supported and specialist housing and accommodation as an infrastructure item or set out delivery mechanisms, triggers, land requirements or costing for such provision. ECC recommends that policy MG4 be amended to ensure there is explicit reference to supported and specialist housing and accommodation; ensuring evidenced needs within the ECC’s Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025) can be secured through developer contributions.</p>

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		<p>ECC also notes that MG4 does not reference ECC’s SSHANA (2025), which sets out the scale and type of supported and specialist housing and accommodation required across all population groups and is the most up to date evidence base for SSH needs.</p> <p>MG4 does not set a clear expectation that developer contributions will secure Supported and Specialist Housing (SSH) in line with SSHANA (2025) where growth generates need. Without this, there is a risk SSH will not be planned for or secured in a timely and appropriate manner.</p> <p>MG4 also omits reference to relevant Essex design guidance, including the Essex Design Guide (Inclusive Design), dementia inclusive design guidance, including the Environments for Ageing and Dementia Design Assessment Toolkit (EADDAT, 2024) the ECC Extra Care Design Guide (2023), and the ECC Supported Living Accommodation Standards (Adults with Disabilities, 2024). These guides are essential to securing high quality, inclusive, accessible, SSH designed to meet the needs of the intended population group/s.</p> <p>ECC recommends that the MG4 be amended to ensure -</p> <ul style="list-style-type: none"> • Specialist and Supported Housing is recognised as essential social infrastructure. • Reference is made to the SSHANA (2025) as the evidence base and articulated within the reasoned justification to support the policy. • Identify Specialist and Supported Housing delivery mechanisms. • Include Specialist and Supported Housing delivery triggers within the Infrastructure Delivery Plan. • Reference Essex/ECC design guidance to ensure inclusive, accessible and high quality- provision designed to meet the needs of the intended population group/s. <p>The Evidence Base that must be referenced and provided with the Local Plan include –</p> <ul style="list-style-type: none"> • ECC Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025) • Essex Design Guide – Inclusive Design • Environments for Ageing and Dementia Design Assessment Toolkit (EADDAT, 2024) • ECC Extra Care Design Guide (2023) • ECC Supported Living Accommodation Standards (Adults with Disabilities, 2024).

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ECCREP_16	MG4 - Infrastructure Contributions	<p><u>Infrastructure – Waste/Waste Disposal</u></p> <p>ECC notes that MG4 fails to include reference to waste/waste disposal. Attention is drawn to the ECC Developers Guide to Infrastructure Contributions 2025, which includes reference to the provision of community waste and recycling facilities. Community facilities include wider waste infrastructure requirements as set out in the guide such as but not limited to transfer stations, depots and associated logistical infrastructure, waste treatment facilities.</p> <p>It is also important to note that the Essex Waste Partnership’s joint Waste Strategy for Essex sets out our commitment to design and delivery of services that will deliver on our targets to reduce waste and recycle more, and to deliver the circular economy in Essex.</p> <p>ECC recommends that the provisions within the policy MG4 must be amended to include reference to waste and waste disposal infrastructure, to meet future needs.</p>
ECCREP_17	Developer Contributions: Policy MG4 (6) Page 44	<p><u>Cumulative Contributions for Infrastructure</u></p> <p>ECC appreciates and supports the overarching approach that RDC are seeking to adopt within this policy. However, attention is drawn to the NPPF which states that “<i>conditions that are required to be discharged before development commences should be avoided, unless there is a clear justification</i>” (Para 57). This is also consistent with information presented within the Town and Country Planning Act 1990 which highlights the requirement the applicant’s written agreement to the terms of a pre-commencement conditions, unless prescribed circumstances apply.</p> <p>To ensure compliance ECC recommends that the Local Plan be amended to ensure cumulative impacts from developments are identified and policy provisions set out to ensure the funding and delivery of infrastructure to support future development. Robust evidence (e.g. inclusion with the Infrastructure Delivery Plan/Transport Assessment etc…) will be required to substantiate cases where cumulative contributions will be required.</p>
ECCREP_18	Developer Contributions: Policy MG4 (7b) Page 44	<p><u>Developer Contributions for Early Years and Child Care</u></p> <p>ECC notes that the infrastructure referred to within policy MG4 includes reference to Early Years and fails to refer to ‘<i>Childcare</i>’.</p> <p>Attention is drawn to note the Childcare Act 2006. ECC has a statutory duty to ensure there is sufficient high quality and accessible early years and childcare places within the administrative area of Essex. Section 6 of the Act defines ‘<i>sufficient childcare</i>’ as sufficient to meet the requirements of parents in the area who require childcare in order to enable them to take up, or remain in, work or undertake education or training which could reasonably be expected to assist them to obtain work.</p>

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		<p>Unlike education, parents can choose to access childcare away from their home area, for example near to a place of work or training.</p> <p>It is important to note that Early Years and Childcare provision includes full day care, pre-schools, child minders, school run early years provision (2-to 5-year-olds), and ‘wrap around care’ (Breakfast, After school and Holiday clubs). This multiplicity of provision, working in partnership with the Private, Voluntary and Independent (PVI) sectors, enables a wide range of childcare options to be made available. For more information on Early Years and Child Care</p> <p>Early Years is generally considered to form part of ‘education’, but childcare may not fall under this definition. ECC recommends for clarity and effectiveness the glossary includes a definition for education that is inclusive of childcare. Furthermore, for information on Early Years and Child Care requirements for infrastructure contributions attention is drawn to the ECC Developers’ Guide to Infrastructure Contributions (2025).</p>
ECCREP_19	Developer Contributions: Policy MG4 (7) Page 44	<p><u>Developer Contributions and Infrastructure Definition</u></p> <p>ECC welcomes and supports that policy MG4 is seeking to define infrastructure “<i>broadly</i>” (bullet 7). The policy then sets out a list of examples within the lettered bullets. ECC recommends that further clarity be provided to ensure that the interpretation of the policy is clear that those listed are examples and not exhaustive.</p> <p>It is recommended that policy MG4 provides a clear appreciation of the types of infrastructure that it covers, and where examples are listed these are not exhaustive. It is also recommended that the glossary includes a definition for physical and social infrastructure.</p> <p>ECC also note and welcome the inclusion of Green and Blue Infrastructure, biodiversity net gain, and strategic habitat mitigation within the development contributions framework, recognising their essential role in delivering nature recovery, climate resilience, and high-quality places.</p> <p>ECC recommends that the draft Local Plan be amended to include a clear definition for infrastructure, to enhance clarity and effective delivery. To assist in defining infrastructure attention is drawn to the ECC Developers’ Guide to Infrastructure Contributions (2025) and the HM Treasury UK Infrastructure: A 10 Year Strategy (2025).</p>

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SECTION B – BUILDING A SUSTAINABLE FUTURE – Chapter 5 – Creating Sustainable Communities		
ECCREP_20	Policy SC2: Operational Energy and Carbon (Net Zero) In Homes and Buildings 5.1.14., bullet point 2 p. 52	<p><u>Typo Error</u></p> <p>Insert a bracket after 2022 to read –</p> <ul style="list-style-type: none"> • <i>Financially feasible (Net Zero Carbon Viability Study for Essex by Three Dragons, August 2022); and</i>
ECCREP_21	Policy SC2: Operational Energy and Carbon (Net Zero) In Homes and Buildings 5.1.14., bullet point 3 p. 52	<p><u>Amend Legal Advice Titles and Correction to Date</u></p> <p>ECC recommend that the legal advice titles be amended and correct date inserted as follows –</p> <p><u>Essex Open Legal Advice A (Updated May 2025) – Energy policy in plans and Building Regulations (Estelle Dehon KC, Cornerstone Barristers, 6th May 2025)</u></p> <p><u>Addendum to Essex Open Legal Advice (October 2025) (Estelle Dehon KC, Cornerstone Barristers, 20th October 2025)</u></p>
ECCREP_22	Policy SC2: Operational Energy and Carbon (Net Zero) In Homes and Buildings p. 53-54	<p><u>Continued Engagement and Joint Working</u></p> <p>ECC welcomes the inclusion of Policy SC2: Operational Energy and Carbon (Net Zero) In Homes And Buildings, which broadly reflects the updated <u>Operational Energy & Carbon (Net Zero) Planning Policy Statement - October 2025</u> that is supported by the technical and legal evidence base collaboratively prepared by the local authorities of Greater Essex.</p> <p>The open legal advice by Estelle Dehon KC, provides strong legal justification for setting local plan policies that require homes and buildings to achieve higher energy performance standards than the minimum standards of Building Regulations. Setting such policies, based on robust evidence, enables LPAs to fulfil their duties in relation to:</p> <ul style="list-style-type: none"> • including policies designed to secure development and use of land that contributes to the mitigation of, and adaptation to, climate change (as required by Section 19(1A) of the Planning and Compulsory Purchase Act ‘PCPA’ 2004), and,

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		<ul style="list-style-type: none"> contributing to the statutory obligation for the UK to meet the carbon budgets and net zero by 2050 target (as set out in the Climate Change Act 2008). <p>The legal advice clearly states that Local Planning Authorities are justified in setting such policies and may choose to do this under the power flowing from Section 19(1A) of the PCPA 2004. See paragraphs 63 – 70 of the Essex Open Legal Advice A (Updated May 2025) – Energy policy in plans and Building Regulations (Estelle Dehon KC, Cornerstone Barristers, 6th May 2025); and paragraphs 15 – 19 of the Addendum to Essex Open Legal Advice (October 2025) (Estelle Dehon KC, Cornerstone Barristers, 20th October 2025)</p> <p>ECC welcomes and supports the active participation of RDC in the Essex-wide collaborative Climate planning policy support (CPPS) group.</p> <p>ECC welcomes the opportunity to continue to work collaboratively on energy and carbon policy development and supporting evidence.</p>
ECCREP_23	<p>Policy SC2: Operational Energy and Carbon (Net Zero) In Homes and Buildings</p> <p>d) Requirement 4: On-site renewable energy generation, point iii</p> <p>p. 53-54</p>	<p><u>Clarity for Offsetting Fund Policy Wording</u></p> <p>The inclusion of wording from the model GE1 policies in <i>Operational Energy & Carbon (Net Zero) Planning Policy Statement - October 2025</i> as the basis of ‘d) Requirement 4: On-site renewable energy generation’ is welcomed. However, it is recommended that this section of the wording from GE1 be included in the Rochford SC2 policy to provide greater clarity as to where information about the offsetting fund can be found.</p> <p>ECC recommends that this section of the wording from GE1 in Operational Energy & Carbon (Net Zero) Planning Policy Statement - October 2025 be included in the Rochford SC2 policy to provide greater clarity as to where information about the offsetting fund can be found:</p> <p><u><i>The offset price is set at £1.82 per kWh or the most recent updated version published on the Essex Design Guide** and the contribution shall be calculated at the time of planning application determination.</i></u></p> <p><u><i>**https://www.essexdesignguide.co.uk/climate-change/essex-net-zeroevidence/</i></u></p>
ECCREP_24	Policy SC2 - Operational Energy and Carbon (Net	<p><u>UK Net Zero Carbon Building Standard</u></p> <p>ECC draws attention to the recently published UK Net Zero Carbon Building Standard, the Essex Climate and Planning Unit is currently reviewing this and will highlight any recommended considerations for emerging Local Plans developing their low carbon policies.</p>

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ECC Representation Reference	Document Ref	Comments/Recommended Changes and Additions
	Zero) In Homes and Buildings	
ECCREP_25	Policy SC3: Embodied Carbon and Circular Economy In Homes and Buildings p. 57-58	<p><u>Continued Engagement and Joint Working</u></p> <p>ECC welcomes the inclusion of Policy SC3: Embodied Carbon and Circular Economy In Homes And Buildings, which broadly reflects the updated Embodied Carbon and Circular Economy Planning Policy Statement (October 2025) that is supported by the technical and legal evidence base collaboratively prepared by the local authorities of Greater Essex.</p> <p>ECC welcomes and supports the active participation of RDC in the Essex-wide collaborative Climate planning policy support (CPPS) group.</p> <p>ECC welcomes the opportunity to continue to work collaboratively on energy and carbon policy development and supporting evidence.</p>
ECCREP_26	SC3 - Operational Energy and Carbon (Net Zero) In Homes and Buildings	<p><u>Circular Economy and Relationship with Waste</u></p> <p>ECC notes that policy SC3 sets out aspects that must be considered for facilitating the adoption of the ‘circular economy’.</p> <p>ECC notes that the context and background to policy SC3 includes reference to the “<i>Essex Embodied Carbon Policy Study – Technical Evidence Base</i> (Levitt Bernstein et al, 2025)” available on the Essex Design Guide (EDG) website. It highlights an awareness that the Local Plan must seek to ensure that aspects sustainability of development be recognised with an appreciation that this begins with construction.</p> <p>To enhance this, it is recommended that policy SC3 be amended to include reference to explicitly promoting waste reduction, re-use and recycling, sustainable building design and the use of sustainable materials, including in relation to their procurement, in the construction of new development or redevelopment. This will ensure provisions are consistent with Policy S4 of the Essex Minerals Local Plan 2014 (MLP).</p>
ECCREP_27	SC4 – Renewable and Low Carbon Energy Generations – Bullet (1d)	<p><u>Renewable and Low Carbon Energy Generation – Green Belt</u></p> <p>ECC’s response to policy SC4 seeks to ensure that consideration is given to biodiversity net gain and nature recovery, to ensure schemes support wider environmental objectives alongside decarbonisation.</p> <p>It acknowledged that the RDC Local Plan will be assessed using the NPPF 2024, however it is also accepted that emerging NPPF reforms, emphasise that land within the Green Belt should contribute to maintaining openness and preventing urban sprawl, as well as supporting nature recovery. ECC notes that throughout the draft Local Plan RDC are seeking to enhance and facilitate nature recovery.</p>

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ECC Representation Reference	Document Ref	Comments/Recommended Changes and Additions
		<p>To enhance this approach ECC recommends that the draft Local Plan policy SC4 bullet 1(d) be amended to – <i>d) preserve the openness and character of the Green Belt, where relevant, <u>and demonstrate that the proposal will contribute positively to biodiversity net gain and support nature recovery, proportionate to its scale and setting.</u></i></p>
ECCREP_28	<p>SC5 – Local Environmental Impacts</p> <p>Reasoned Justification Paragraphs 5.1.38 – 5.1.42</p>	<p><u>Local Environmental Impacts and Vulnerable Persons</u></p> <p>ECC notes that policy SC5 provides a framework for managing local environmental impacts. It is noted and welcomed that policy SC5 highlights a relationship with strategic objective ‘SO1 - Housing to meet local needs’</p> <p>ECC recommends that within the Reasoned Justification Paragraphs 5.1.38 – 5.1.42 it provides an appreciation of the impacts local environmental impacts may have on vulnerable persons. ECC notes that in applying policy SC5 and its relationship with SO1 that noise, lighting, air quality and general activity levels can have a greater effect on older people and people with disabilities, including those with sensory impairments, cognitive impairment, autism or reduced mobility. These factors can influence whether homes and neighbourhoods are inclusive and are suitable for people who may be more sensitive to environmental disturbance.</p> <p>To support this justification reference to ECC’s Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025) identifies a significant number of older people and people with disabilities in Rochford who require housing that supports their independence-. Ensuring environmental impacts are appropriately considered at planning application stage will help ensure the suitability of homes and neighbourhoods for these population groups.</p> <p>The relevant evidence bases to support the amendment include –</p> <ul style="list-style-type: none"> • ECC Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025); and • Essex Design Guide – Inclusive Design
ECCREP_29	<p>5.2. Place-Making and Design Policy SC6 – Achieving High Quality Design</p> <p>Reasoned Justification</p>	<p><u>BREEAM Standards</u></p> <p>Reference to BREEAM standards and the statement that ‘<i>Applicants will demonstrate how they will meet BREEAM excellent or equivalent standards</i>’ has limited weight if only included in the <i>Reasoned Justification</i> section.</p> <p>ECC recommends that any expectation to achieve BREEAM standards be clearly outlined in policy to effectively secure delivery and define which development typologies are affected.</p> <p>ECC propose the following wording –</p>

ECC Representation Reference	Document Ref	Comments/Recommended Changes and Additions
	p. 72	<i>'Non-residential development over 500m² should achieve BREEAM Excellent.'</i>
ECCREP_30	SC6 - Achieving High Quality Design	<p><u>National Design Expectations and Proposed Amendments</u></p> <p>ECC has reviewed SC6 against the objectives and principles set out the National Design Guide (NDG), and proposed amendments to ensure the emerging policy reflects national expectations for design quality and placemaking.</p> <p>ECC recommend that SC6 be strengthened to ensure that the local context and specific design requirements and objectives are embedded within the policy.</p> <p>ECC notes that the NDG, requires local authorities to ensure their design policies align with the NDG to secure high-quality design and placemaking. The NDG identifies ten characteristics of well-designed places, and the principles underpinning all these characteristics should be embedded within Policy SC6. While it is appreciated that the draft policy makes reference to many of these themes, there is scope to strengthen the wording so that it is more specific, measurable, and aligned with best practice.</p> <p>When comparing Policy SC6 to other local plan design policies, the draft version of Policy SC6 appears quite brief and limited. By expanding Policy SC6 to articulate more detailed design expectations and clearly requiring context-led design, the policy would facilitate the delivery of high-quality, distinctive places that national policy seeks to achieve.</p> <p>ECC recommends the following amendments to SC6 –</p> <ul style="list-style-type: none"> • Bullet 1 of SC6 – recommend the wording be amended to read - <i><u>The Council will require good design and 'place making' and will seek high quality design in all development with the district. Innovative and good design will be encouraged and promoted, and development of poor design, that does not take available opportunities to improve an area's character and quality, and the way it functions, will be refused planning permission. The Council will expect developers to show how their proposals will achieve high quality inclusive design to ensure an accessible environment, and how they have engaged with users to ensure the design vision is informed by the site's landscape, heritage, and townscape context''.</u></i> • <i><u>Bullet 2a</u></i> of SC6 – be amended to read “<i><u>Proposals in Conservation Areas must demonstrate how they respond to will need to take account of Conservation Area Appraisals and conserve and enhance the character and significance of the historic environment, in accordance with Policy HE1 follow the principles of good design as set out in national policies''</u></i>” • <i><u>Bullet 2b</u></i> of SC6 be amended to ‘<i><u>Within Development Opportunity Areas and large allocated sites (100+ dwellings), innovative and distinctive changes to the local character of these areas may be supported provided that proposals respond sensitively to the site and surrounding area and strengthens the character and legibility of the area.'</u></i>

ECC Representation Reference	Document Ref	Comments/Recommended Changes and Additions
		<ul style="list-style-type: none"> • Further criteria for Part 2 of SC6 be included - <u>Development must respond to landscape character, key views, topography and the settlement edge, retaining and enhancing important landscape features.</u> • <u>Bullet 3a of SC6 be amended to - ‘Make a positive architectural and design contribution to the local character (including landscape and heritage character).’</u> • <u>Bullet 3b of SC6 be amended to - ‘Demonstrate a thorough understanding of the site context and how they relate to the existing area and be of an appropriate layout, density, materiality, scale, height, mass, proportion and form.’</u> • <u>Bullet 3d of SC6 be amended to - ‘Create a high-quality, inclusive, and well-designed public realm that promotes positive social interaction and be is accessible to all potential users, including those with mobility difficulties.’</u> • <u>Bullet 3e of SC6 be amended to - ‘Create safe, legible, and attractive access points for pedestrians, cyclists and motor vehicles, where practicable prioritising sustainable and active travel modes wherever practicable.’</u> • <u>Bullet 3f of SC6 be amended to - ‘Ensure Protect the amenity of existing and future occupiers and of residents occupying properties in the surrounding area is not significantly affected, by avoiding development that is overlooking, overbearing, results in a loss of daylight, and/or has unacceptable levels of light pollution, noise, vibration, odour, emissions and dust; and respect the scale, massing and height of surrounding buildings.’</u> • <u>Bullet 3g of SC6 be amended to - ‘Ensure Using high-quality and durable materials, to ensure buildings are robust, efficient and support the longevity fit for the life of the development, while respecting and enhancing the local character.’</u> • <u>Bullet 3h of SC6 be amended to - ‘Incorporate sustainable design principles measures that mitigate and respond to the likely impacts of climate change, promote low embodied carbon construction, energy efficiency, and support long-term environmental resilience.’</u> • ECC recommends the following principles be included within part 3 of Policy SC6: <ul style="list-style-type: none"> - <u>Respect and integrate with the existing layout of the surrounding area, creating clear and legible routes which provide direct connections to the wider movement network.</u> - <u>Use appropriate and high quality hard and soft landscaping to help create character, improves the public realm, and connects to green infrastructure networks.</u> - <u>Be designed to minimise crime and antisocial behaviour, creating safe and secure environments.</u> - <u>Provide high standards of accommodation for housing in terms of size, quality and arrangement of internal space, external private and communal amenity space, and access to usable open space.</u> - <u>Provide appropriate and conveniently located facilities for refuse, recycling and servicing.</u> - <u>A direct reference of the Essex Design Guide and/or Sport England’s Active Design Principles.</u>

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		<ul style="list-style-type: none"> - <u>Privacy and separation including potential measured distances such as: Does not result in an adverse impact upon the amenity of neighbouring occupiers in relation to overlooking and privacy, daylight/sunlight, outlook, noise and vibration; and respects the scale, massing and height of surrounding buildings.</u> - Bullet 4 of SC6 be amended to read - <u>‘The design of new shopfronts and other commercial signage should be of a high quality and make a positive contribution to demonstrate respect for the character, appearance, and visual amenity of the building and the wider area, respecting the architectural composition, proportions, and detailing of the building architecture of the buildings and the character of the area in or on which they are set.’</u> • Bullet 5 of SC6 be amended to - <u>‘The Council will exercise strict control over the number, design, scale, and siting of advertisements and hoardings to ensure they do not harm the character, appearance, and amenity of individual buildings and streets are not materially harmed, having regard to the interests of amenity and to safeguard public safety (including highway safety).</u> <u>Advertisements will be supported provided that they:</u> <ul style="list-style-type: none"> a) do not create <u>add to</u> visual clutter or detract from the visual amenity, character, or quality of the surrounding area, including key views and the setting of heritage assets of the area b) incorporate an appropriate design and materiality, including materials, which are of a high quality and preserve and/or enhance the character of the surrounding built form and street scene area c) are of a scale, proportion, and positioning that is appropriate to context, including the architectural form and features of any buildings to which the advertisement would be attached d) would not, by virtue of their design, scale or siting, give rise to pedestrian or highway safety issues; and e) are only illuminated where this does not give rise to light pollution or an adverse impact on pedestrian or highway safety”.
ECCREP_31	SC6 - Achieving high quality Design Bullet (3)	<p><u>Design Principles and Infrastructure-Led Approach</u></p> <p>ECC recommends that to support and ensure a consistent approach to infrastructure – led development, that policy SC6 include an additional design principle bullet.</p> <p>ECC recommends that the additional design principle bullet must be articulated to demonstrate that an infrastructure – led approach to design has shaped future development from the outset. Strengthening the policy to require early integration of infrastructure to support high-quality place-making and climate resilience.</p>

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		<p>It is also recommended what where appropriate the supporting text must be amended to highlight matters for consideration – by way of example - the delivery of functional Green and Blue Infrastructure must be delivered in line with national or local Green Infrastructure standards, such as the Essex Green Infrastructure Standards.</p> <p>The proposed wording for the additional design principle is –</p> <p><i><u>“All development must adopt an infrastructure-led approach, demonstrating how the delivery of infrastructure has informed the layout and design, including the protection, enhancement and connection of existing features, habitats, and development to deliver multifunctional benefits.”</u></i></p>
ECCREP_32	High Quality Design: Policy SC6 Page 69	<p><u>High Quality Design and the School Environment</u></p> <p>ECC notes that the draft Local Plan policy SC6 includes bulleted subheadings for ‘shop frontages’ and ‘advertisements and hoardings’. It is important that RDC seek to ensure that the policy clearly articulates the expectations for the delivery of high-quality design when considering development, within the vicinity of an existing or new school sites. In providing future schools/capacity at existing schools, consideration must be given to the site and the environment around it.</p> <p>RDC’s attention is drawn to the Essex Design Guide Schools Guidance which sets out expectations regarding new facilities. For existing schools, School Streets should be encouraged to improve pupil safety and support learning.</p> <p>ECC recommends that the policy be amended to - <i><u>Deliver high quality design around schools through adherence to the Essex Design Guide Schools Guidance and the adoption of School Streets.</u></i></p>
ECCREP_33	SC6 - Achieving high quality Design Reasoned Justification Paragraphs 5.1.38 – 5.1.42	<p><u>High Quality Design and Specialist and Supported Housing</u></p> <p>ECC notes that policy SC6 references inclusive design in broad terms but does not explicitly reference dementia ‘inclusive- design or environments that support older people and people with disabilities, including people with cognitive or sensory impairments. The reasoned justification (paragraph 5.2.17) acknowledges the need for design to be accessible for wheelchair users and older people with reduced mobility, which is welcomed. However, it does not reflect the wider range of population groups identified in SSHANA (2025), including people with autism, learning disabilities, sensory impairments and cognitive impairment, whose needs should be addressed through accessible, inclusive and dementia inclusive- design principles.</p>

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		<p>ECC also notes policy SC6 fails to require developers to demonstrate how the layout of buildings, external spaces, public realm and access routes will support independent movement, ease of wayfinding and sensory and cognitive accessibility for older people and people with disabilities.</p> <p>To ensure reference to these matters, ECC recommends that there is also reference to relevant existing evidence to inform the emerging Local Plan, and policy SC6. ECC’s Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025), identifies the population groups in Rochford who have specific access, sensory and cognitive needs that should be reflected in high quality, accessible and inclusive design. Furthermore, reference must be made to the Essex and ECC design guidance that provides expectations for inclusive and dementia inclusive- environments.</p> <p>ECC acknowledges that the reasoned justification (paragraph 5.2.5) appropriately references the Essex Design Guide, which is welcomed. However, the policy and supporting text do not reference other key ECC design guidance, including the Environments for Ageing and Dementia Design Assessment Toolkit (EADDAT, 2024), the ECC Extra Care Design Guide (2023), or the ECC Supported Living Accommodation Standards (Adults with Disabilities, 2024), all of which are essential to securing high quality- and inclusive specialist accommodation.</p> <p>ECC notes that bullet 3(d) of policy SC6 refers to accessibility “for those with mobility difficulties”, this is too narrow and must be expanded to reflect the needs of people with cognitive and/or sensory impairments.</p> <p>ECC recommends that the policy SC6 must be amended to -</p> <ul style="list-style-type: none"> • Include reference to dementia inclusive design, given dementia-inclusive design is widely recognised as a ‘universal design’ approach – supporting people living with dementia, improving accessibility, safety, and functionality for everyone, including older people and people with disabilities. • Include reference to cognitive and sensory accessibility, referring to wayfinding and features that support ease of movement for people with sensory or cognitive needs. • Bullet 3(d) of SC6 must include the full range of accessibility ensuring the reference is expanded to include all disabilities and impairments, including cognitive and sensory needs. • Within the Reasoned Justification include a link to the ECC Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025), ECC Supported and Specialist design guidance (, Extra Care Design Guide, supported living standards).
ECCREP_34	SC6	<u>High Quality Design and Waste Reduction, Recycling</u>

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		<p>ECC recommends that SC6 must be amended to ensure that it addresses how building design influences resident engagement, access and participation to waste reduction and recycling activities such as community reuse, home composting, requirements to segregate recycling and waste and how good design can facilitate this within communities and within the plot of the building.</p> <p>Similarly, policy SC6 must set out requirements for bin storage and street furniture - including litter and recycling bins delivered as essential infrastructure (Simpler Recycling – requirements for recycling ‘on the go’) and form part of good design. Quality bin storage and street furniture must support the segregation of recycling and recovery of resources to deliver the circular economy.</p>
ECCREP_35	<p>SC6 - Achieving high quality Design</p> <p>Reasoned Justification Paragraph 5.2.21</p>	<p><u>Inclusion of Resource Efficiency and Circular Economy</u></p> <p>ECC recommends that the paragraph be amended to include a statement to <i>“maximise resource efficiency to deliver the circular economy”</i>.</p>
ECCREP_36	Paragraph 5.2.39	<p><u>Minor Error/Possible Typo</u></p> <p>Amend wording and case of letter to read –</p> <ul style="list-style-type: none"> • <i>“Proposals will be required to undertake a project level Habitats Regulations Assessment (HRA) to address assess the impact of development proposals on Habitats sites and adhere to relevant safeguarding zones as designated by the MOD concerning the distance between development and its activities on site.”</i>
ECCREP_37	<p>Community Facilities: Policy CL1</p> <p>Reasoned Justification Paragraphs 5.3.4 – 5.3.9</p>	<p><u>Definition of Community Facilities</u></p> <p>ECC notes that there is a definition of community facilities within the glossary, but the policy fails to provide clarification on the definition of community facilities, it is recommended that greater clarity be given for the effective delivery of this policy. Furthermore, it is also recommended that the policy clearly highlights that education facilities will be addressed within policy CL2.</p>

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		<p>ECC notes that the glossary definition and policy CL1 fail to include reference to inclusive or dementia inclusive design, which is essential to ensure facilities can be used independently by older people and people with disabilities, including people with sensory impairments, autism or cognitive impairment.</p> <p>ECC also notes the policy fails to require development to show how internal layouts, entrances, access routes and movement within and around facilities will support independent use for people with a range of accessibility needs.</p> <p>The Reasoned Justification (paragraphs 5.3.4 – 5.3.9) CL1 does not reference relevant Essex and ECC guidance that sets expectations for accessible, inclusive and dementia inclusive environments. ECC recommends that reference be provided to:</p> <ul style="list-style-type: none"> • Essex Design Guide – Inclusive Design; and • Environments for Ageing and Dementia Design Assessment Toolkit (EADDAT). <p>ECC recommends that CL1 be amended to –</p> <ul style="list-style-type: none"> • Include reference to inclusive or dementia inclusive- design for community facilities. • Include a requirement for development to show how community facilities will support independent use by older people and adults with disabilities. • Include an expectation for accessible routes into and around community facilities that support independent use by older people and adults with disabilities.
ECCREP_38	Education Facilities: Paragraph 5.3.11 & 5.3.12 Page 84	<p><u>Education and Evidence Base</u></p> <p>ECC notes that the section entitled ‘<i>Evidence Base</i>’ correctly refers to the 10 Year Plan (albeit the 2026-35 edition is now available) but new education and childcare infrastructure arising from the Local Plan must be evidenced by Scenario Testing. For mainstream schools, this process is set out in the ECC Local and Neighbourhood Planners’ Guide to School Organisation and Place Planning (section 3.4). ECC completed and provided RDC with a scenario test (dated August 2025), this test identified a potential need for land to be allocated for education and childcare use. The draft Local Plan submitted evidence and supporting text for policy CL2 fails to reference this work.</p> <p>In developing the emerging Local Plan, education and childcare infrastructure requirements must be based on an up-to-date Scenario Test.</p>
ECCREP_39	CL1 – Community Facilities Bullet (3)	<p><u>Defining “Generally Accessible”</u></p> <p>ECC draws attention to the NPPF (2024) which the emerging Local Plan must comply with, it states</p>

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		<p><i>“Strategic policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for.... c) Community facilities ... These should be limited to those necessary to address the strategic priorities of the area...” (Para 20 – 21).</i></p> <p>Furthermore, it is noted that within the draft Local Plan strategic objective SO9 – seeks to ensure that community facilities are ‘accessible’. Whilst the text set out in policy CL1 refers to new community facilities <i>“be sited in locations which are generally accessible....”</i>. The use of the word ‘generally’ within the policy then seeks to infer more questions; including how will “generally accessible” be defined in planning decisions?</p> <p>ECC recommends that the policy be amended by deleting reference to ‘generally’, consistent with SO9 and the NPPF. Or RDC defines the precise meaning of ‘generally accessible’.</p>
ECCREP_40	Education Facilities: Policy CL2 para 1b Page 85	<p><u>ECC Developers’ Guide and Compliance</u></p> <p>ECC is seeking to ensure that RDC are aware that new education and childcare sites must <u>meet</u> the criteria set out in the <u>Developers’ Guide</u> not ‘have regard’ as stated in the current policy wording for CL2. Any deviation from the Developers’ Guide must be agreed by ECC. New school design and the environment around schools must comply with the <u>Essex Design Guide Schools Guidance</u>.</p> <p>ECC recommends that policy CL2 be amended to read –</p> <p><i>“1b) <u>Meet the criteria</u> for new education facilities set out in ECC’s Developers’ Guide to Infrastructure Contributions (or subsequent guide)”;</i></p> <p>And add an additional bullet 1e) to read - <i>1e) <u>Comply with Essex Design Guide Schools Guidance</u>.</i></p>
ECCREP_41	Education Facilities: Policy CL2 para 3 Page 85	<p><u>Education Facility Delivery</u></p> <p>In determining the likely interpretation of the policy wording within CL2 paragraph 3, ECC considers that as drafted, the use of the term ‘provision’ implies developer delivery is acceptable. It is important to note that developer delivery of education facilities is only appropriate if the criteria set out in the ECC guide to <u>Garden Communities and Planning School Places</u> are met (outlined in section 6.3). RDC must note that the transfer of land to the appropriate Authority for Education (ECC), along with a commensurate financial contribution, is the most common delivery route.</p>

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		<p>ECC recommends that the policy wording and justification text be amended to - Clarify that ECC expects to deliver new schools and that land <u>and</u> financial contributions are required.</p>
ECCREP_42	<p>CL2 – Education Facilities and Para 5.3.17</p> <p>Chapter 12 – Table 12</p>	<p><u>Cross Boundary Considerations and Education Facilities</u></p> <p>ECC are mindful that housing allocations within the North of Southend and Great Wakering allocations and the future education facility need will need to consider the needs of SCC as well as ECC as separate Education Authorities. Furthermore, considerations with regard to the Grammar School system.</p> <p>ECC recommends that the policy text be amended to ensure that appropriate considerations is given to cross border education needs and the cumulative impacts. Similarly, the justification text as part of paragraph 5.3.17 must be amended to ensure cross boundary implications are considered.</p>
ECCREP_43	<p>Education Facilities: Para 5.3.15 Page 85</p>	<p><u>Education Facilities and ECC’s Statutory Role</u></p> <p>ECC’s role as lead local authority for education covers early years and childcare (EYCC), primary, secondary (including sixth form), Special Education Needs and Disabilities (SEND), and Post 16 education; and a lead authority involved in adult learning and skills.</p> <p>ECC has a statutory duty under the Education Act (1996) (the Act) and the Childcare Act (2006) to secure sufficient childcare for working parents (inclusive of free provision). Under section 14 of the Act, local authorities must secure sufficient school places to serve their area. The available schools must be sufficient in number, character and equipment to provide all pupils with the opportunity of an appropriate education (including those with Special Educational Needs).</p> <p>ECC notes that paragraph 5.3.15 setting out the reasoned justification for policy CL2, fails to reference childcare, SEND, post 16 and adult learning and skills provision. ECC thinks that this is an omission and must be rectified for the delivery of education facilities that will meet the future needs within RDC.</p>
ECCREP_44	<p>Education Facilities: Para 5.3.18 Page 87</p>	<p><u>School Parking Standards</u></p> <p>School car parking must comply with the Essex Parking Standards. An appreciation of the justifications for this approach is set out within section 4.2 of ECC’s Developers’ Guide. This section of the guide highlights that the on-site drop-off by parents is not supported (except for pupils with mobility issues). The guide states</p> <p><i>“New schools will not provide on-site space for parents to drop children off by car, except for pupils with disabilities, for the following reasons:</i></p>

ECC Representation Reference	Document Ref	Comments/Recommended Changes and Additions
		<ul style="list-style-type: none"> • <i>the school site area guidelines reflect the space required for education use and it is not appropriate to set aside significant areas for other purposes;</i> • <i>schools should not be expected to manage or maintain facilities which may give rise to an insurance liability in the event of accidents, and</i> • <i>bespoke drop-off facilities can attract additional school run traffic and concentrate vehicle movements in a particular location, leading to an unpleasant or unsafe environment.</i> <p><i>The preferred approach is to maximise the opportunities for safe drop-off at a reasonable distance from the school, using the visitor parking spaces that the development is required to provide. As above, the immediate area around school entrances must be traffic free, to prevent ‘honey potting’ i.e., a point that attracts a disproportionate level of traffic that could cause inconvenience to other road users. Such pedestrianised areas also function as a space for parents and younger siblings to congregate safely at the beginning and end of the school day and thereby encourage a sense of community” (Section 4.2).</i></p> <p>Further information on education site suitability is highlighted within section 4.2 of the Developers’ Guide, as well as within Appendix C.</p> <p>The environment around new schools must comply with the Essex Design Guide School Guidance. School Streets should be encouraged around existing schools.</p> <p>ECC recommends that paragraph 5.3.18 be amended –</p> <ul style="list-style-type: none"> • <i>With the deletion of “Car parking and drop-off points will need to be planned appropriately for those who cannot travel sustainably, to avoid unacceptable impacts on the local community”.</i> <p>Replacing with suitable references to the Essex Parking Standards and Essex Design Guide School Guidance.</p>
ECCREP_45	5.1.3	<p><u>Flood Risk and Coastal Change</u></p> <p>ECC are mindful that the emerging Local Plan for RDC will be assessed against NPPF 2024. However, it is important that attention is drawn to recent NPPF consultation, where is highlighting the and the need to take into account long- term implication for flood risk and coastal change.</p>

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		<p>Proposed amendments to NPPF highlight that the designation of Coastal Change Management Areas are required for areas likely to be affected by physical changes to the coast, estuaries or tidal rivers, over the next century, through erosion, coastal landslip, permanent inundation or coastal accretion.</p> <p>Similarly in the Government’s guidance for Flood Risk and Coastal Change Flood risk and coastal change - GOV.UK it is stated that a Coastal Change Management Area should be defined where the Shoreline Management Plan (SMP) policy is anything other than hold the line or advance the line during its plan period. They can also be designated where there is uncertainty about securing funding for the implementation of hold or advance the line policies to ensure that inappropriate development is avoided. It is noted that the SMP has Managed Realignment preferred policies (2025 – 2055) for Policy Development Zones for ‘Canewdon H8b’, Paglesham Churchend H11a, Paglesham Eastend H11b.</p> <p>ECC recommends that the background to the policy be amended to ensure reference to the relevant SMP policies for the Rochford area.</p>
<p>SECTION B – BUILDING A SUSTAINABLE FUTURE – Chapter 6 – Movement</p>		
ECCREP_46	6.1.1.	<p><u>Priority for Sustainable Modes</u></p> <p>To ensure consistency with the NPPF (2024) paragraph 115, ECC recommends that paragraph 6.1.1 be amended to prioritise sustainable transport.</p> <p>ECC recommends that paragraph 6.1.1 be amended to read – <i>“reducing the need to travel and offering a genuine choice of <u>sustainable</u> transport modes”</i>.</p>
ECCREP_47	Para 6.1.1 and Para 6.1.10	<p><u>Transport and the Vision-Led Approach</u></p> <p>ECC notes that both paragraphs within the draft Local Plan make reference to the adoption of the vision-led approach and the move towards <i>‘decide and provide’</i>. Whilst ECC support and welcome this approach, it is recommended that paragraph 6.1.1 and 6.1.10 be amended to ensure it is clear how the plan is seeking to deliver this approach. To assist attention is drawn to paragraph 109 of the NPPF (2024).</p> <p>ECC recommends that the text within both paragraphs be amended to reflect that set out within the NPPF, to ensure that there is clarity on the approach taken by RDC for transportation matters within the draft Local Plan.</p>
ECCREP_48	MO1 - Delivering Strategic Transport Infrastructure	<p><u>Electric Vehicle Charging</u></p> <p>ECC recommends that policy MO1 bullet d, be amended to an additional bullet (v) to facilitate the future provision of EV charging, including -</p> <ul style="list-style-type: none"> • Passive provision (ducting and capacity) for future expansion;

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	Page 91 (bullet d)	<ul style="list-style-type: none"> Charging for electric bicycles and micro mobility where appropriate. <p>This will ensure consistency with NPPF (2024) paragraph 112, which aims to ensure policies setting local parking standards for residential and non-residential development, take into account the need for adequate charging.</p>
ECCREP_49	6.1.14 (bullet 1) MO2 – Mitigating the Transport Impacts of Development	<p><u>Transport and Monitoring</u></p> <p>ECC recommends that the paragraph be amended to ensure consistency with the NPPF (2024) paragraph 118 which states – <i>“All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored” (NPPF, para 11).</i></p> <p>To ensure compliance ECC recommends that bullet 1 of paragraph 6.1.14 and policy MO2 bullet (a) be amended to read –</p> <p>Paragraph 6.1.14 be amended to - <i>“...and Travel Plans for developments that meet defined thresholds <u>along with producing annual Monitoring Reports to ensure progress can be measured”.</u></i></p> <p>Policy MO2 bullet a be amended to read –</p> <p><i>Transport Assessment or Transport Statement is provided, proportionate to the scale and nature of the development, together with a Travel Plan where required by national or local thresholds <u>and produce annual Monitoring Reports to measure progress.</u></i></p>
ECCREP_50	MO2 - Mitigating the Transport Impacts of Development	<p><u>Transport Impacts/Mitigation and Larger Sites</u></p> <p>ECC appreciates that this draft Local Plan consultation is not seeking allocate sites (as outlined in paragraph 12.1.2). Instead within chapter 12 the site principles and an appreciation of the sites that require further testing are articulating.</p> <p>In reviewing the policy MO2 that is seeking to highlight RDC’s approach to mitigating transport impacts, ECC are mindful that there is no consideration for the larger sites. ECC recommends that following an appreciation of the larger scale sites that will be allocated within RDC, the emerging Local Plan must set out within policy(s) the approach within the larger scale developments to mitigating transport impacts. Attention is drawn to NPPF (2024) paragraph 111 to assist in developing the policy(s). Furthermore, ECC recommends that consideration be given to the establishment of a larger sites (especially if combined into a larger allocation) modal shift target and other related transport interventions. As well as referencing dedicating funding for travel plans and for larger sites this include the funding of a Travel Plan officer, to assist in delivering on modal shift targets. ECC believe that opportunities to achieve change are greater in larger scale developments.</p>

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		<p>ECC also recommends that the context and background, and the policy ensures that there is reference to the ECC Developers’ Guide for Infrastructure and in particular section 5.5. This section provides an appreciation of ECC’s role as the Highways and Transportation Authority, in seeking to assess the overall impact of development and identify transportation measures to deliver sustainable development, including enhanced passenger transport services and infrastructure, comprehensive active travel networks, improved public rights of way, and sustainable travel planning. This section provides an understanding of the types of information that may be required to allow sufficient assessment of development proposals to be assessed. Ensuring reference to the ECC Developers’ Guide within the policy and supporting text will ensure that ECC can insist on the mitigation for any future development proposals to mitigate impacts on the Rochford highways network. Similarly, ECC also recommends that reference to given to the EPOA Parking Standards.</p>
<p>ECCREP_51</p>	<p>MO3 - Active Travel Improvements Page 99</p>	<p><u>Education Facilities and Active Travel</u></p> <p>ECC notes and welcomes that policy MO3 mentions “schools”. However, for consistency with the terminology used throughout the draft Local Plan, and allowing cross reference to draft Local Plan policy CL2, ECC recommends that this be amended to ‘Education Facilities’.</p> <p>Furthermore attention is also drawn to the guidance School Streets, an effective way to encourage Active Travel and discourage inappropriate drop-off.</p>
<p>ECCREP_52</p>	<p>MO3 - Active Travel Improvements Reasoned Justification Paragraphs 6.2.5 – 6.2.6 MO4 - Passenger Transport Reasoned Justification</p>	<p><u>Inclusive and Accessible Active Travel</u></p> <p>ECC notes that whilst policy MO3 promotes safe walking and cycling and MO4 promotes improved public transport, both fail to ensure consideration is given to the needs of older people and people with disabilities, including people with physical disabilities, sensory impairments, autism or cognitive impairment, who require accessible and safe routes to support independent movement.</p> <p>ECC recommends that policy MO3 be amended to ensure it requires development to demonstrate how active travel routes, footways, crossing points and lighting will support independent use by people with a range of accessibility needs. Similarly for policy MO4 it be amended to reference to the wider range of people who use public transport, including people with physical disabilities, sensory impairments, autism or cognitive impairment.</p> <p>Both policies must be amended to be consistent with the Essex/ECC guidance to supports accessible and inclusive movement. With specific reference to the Essex Local Transport 4 (LTP4) and Implementation Plans. They must also support independent movement for older people and people with disabilities</p>

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		<p>The evidence bases to support these amendments and be referenced within the reasoned justification paragraphs for each respective policy must include –</p> <ul style="list-style-type: none"> • ECC Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025); • Environments for Ageing and Dementia Design Assessment Toolkit (EADDAT) and • Essex Design Guide- Inclusive Design. • Emerging Local Transport Plan 4 (LTP4).
ECCREP_53	<p>MO4 - Passenger Transport (bullet 4)</p> <p>Page 102</p>	<p><u>Passenger Transport and Schools</u></p> <p>Pedestrian entrances to schools should, where possible, be traffic free. The ECC Developers’ Guide states that “substantial traffic free public realm around all school entrances used by pupils must be incorporated into development plans, whilst ensuring access for emergency vehicles” (Section 5.2 page 44). Section 5.2 also provides guidance on the environment around schools, that may be useful to inform emerging policies. ECC advises that passenger transport stops should be close-by but not undermine the safe pedestrianised spaces by requiring roads to abut them.</p> <p>To ensure consistency with the Developers’ Guide and the environment expected around schools. ECC recommends that policy MO4 bullet 4 be amended to read –</p> <ul style="list-style-type: none"> • Replace ‘close to the principal entrance’ • with ‘<u>a safe but convenient distance from entrances</u>’.
ECCREP_54	<p>MO4 - Passenger Transport (bullet 1)</p>	<p><u>Bus Service Priorities</u></p> <p>ECC welcomes the inclusion of Passenger Transport policy MO4, as it is consistent with NPPF (2024) paragraph 109, as it seeks to promote public transport.</p> <p>In future stages of the Local Plan ECC recommends that when RDC are in a position to highlight specific locations for growth. In seeking to continue the vision-led approach to spatial plan development and tackling transport matters. It is recommended that consideration is given to the ECC bus priorities. For instance, the ECC Bus Service Improvement Plan (BSIP) (2024) sets out the urban and interurban bus corridors throughout Essex, which identifies general corridors for local bus service operations. Welcome this though it will be important to define this with respect to ECC bus priorities as well as the viability of development and what should be the priority. Adopting this approach will also demonstrate a consistency with the NPPF paragraph 109, through the identification and promotion of opportunities to assist public transport use.</p>
ECCREP_55	<p>MO4 - Passenger Transport (bullet 2)</p>	<p><u>Public Transport Contributions</u></p> <p>ECC notes that the current policy wording states “Major residential and commercial schemes will be required to make proportionate contributions towards improving passenger transport infrastructure....” (policy MO4, bullet 2).</p>

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		ECC recommends that RDC review the Developers’ Guide section 5.9 to gain an appreciation of the approach taken by ECC in seeking appropriate financial contributions to mitigate impact of development on the local transport network. Appendix L: Additional Guidance for Developers on Passenger transport requirements also provides further context.
ECCREP_56	Policy MO5: Parking and Electric Vehicle Infrastructure Page 104	<p><u>Essex Electric Vehicle Strategy</u></p> <p>ECC recommends that policy MO5 be amended to ensure reference to the adopted <u>ECC Electric Vehicle Strategy</u>. The strategy aims to ensure that the right size and type of charging points are installed in the right place. This will avoid residential areas becoming “charging destinations” and encouraging people to drive to charge and add to congestion.</p>
ECCREP_57	MO5 - Parking and Electric Vehicle Infrastructure	<p><u>Large Scale Developments and Garden Community Parking Standards</u></p> <p>ECC recommends that bullet 1 of policy MO5 also makes reference to the Essex Planning Officers’ Association (EPOA) Part 2 Parking Standards. ECC notes that the policy makes reference to EPOA Parking Guidance, but there are two separate guidance documents, that should be appropriately referenced.</p> <p>The Part 1 guidance applies to all new developments in Essex. Whilst the Part 2 guidance is intended for application to Garden Communities and large-scale developments, Part 1 is also relevant to these sites. Similarly, Part 2 may also be relevant to some smaller development, particularly those in highly connected locations.</p> <p>ECC recommends that the policy MO5 bullet 1 be amended to specifically reference the EPOA Part 1 and Part 2 Parking Guidance.</p>
ECCREP_58	MO5 - Parking and Electric Vehicle Infrastructure	<p><u>Reduced Parking Provision</u></p> <p>ECC recommends that policy MO5 bullet 2 that seeks to deliver less than minimum parking standards, set out more detail on the circumstances when this would be applicable. To assist ECC recommends reviewing the EPOA Part 1 Parking Standards section 2.5 page 12. This will assist in clearly defining areas where lower parking levels may be particularly relevant, especially in relation to high quality public transport such as town centres and/or where it complements high quality design aspirations. Providing this enhanced detail within the policy will improve the effective delivery of the policy provision.</p>
<p>SECTION B – BUILDING A SUSTAINABLE FUTURE – Chapter 7 – Strong Economy</p>		
ECCREP_59	Strategic Policy EC1 - Supporting Employment Growth	<p><u>Sui Generis Uses and Supporting Employment Growth</u></p> <p>To ensure alignment with the Essex and Southend-on-Sea Waste Local Plan 2017 and to support the continued delivery of essential waste management functions, it is important that the Local Plan includes explicit recognition of the need to</p>

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		<p>accommodate sui generis uses. There is a need to ensure that existing waste capacity can be maintained and increased. The Local Plan should therefore ensure that a sufficient range of employment land is available, including sites suitable for sui generis operations, so that vital waste-related facilities can be delivered and retained within appropriate areas. ECC recommends that policy EC1 be amended to include specific provisions for Sui Generis uses.</p>
ECCREP_60	Strategic Policy EC1 - Supporting Employment Growth	<p><u>Local Skills Improvement Plan</u></p> <p>ECC recommends that EC1 bullet 1 also references the Local Skills Improvement Plan for Essex.</p> <p>About Essex LSIP Essex Chambers of Commerce</p>
ECCREP_61	7.1.36 and 7.1.43	<p><u>Essex Minerals Local Plan and Essex and Southend-on-Sea Waste Local Plan</u></p> <p>ECC welcome reference to the Minerals and Waste Local Plans, however it is recommended that for completeness the correct term is used. ECC recommends that the paragraphs be amended to read –</p> <ul style="list-style-type: none"> • <i>Essex Minerals <u>Local Plan (2014)</u> and Essex and Southend-on-Sea Waste <u>Local Plan (2017)</u>.</i>
ECCREP_62	EC1 - Supporting Employment Growth	<p><u>Strengthening Links with the Rochford Economic Growth Strategy (2025 – 28) and the Rochford Corporate Strategy</u></p> <p>ECC notes that the Rochford District Economic Growth Strategy, emphasises the importance of the Rochford Corporate Strategy, as it is framed around the Corporate Priorities. ECC recommends that for completeness it is important that the draft Local Plan, and in particular policy EC1 a similar approach is adopted. With reference given to the 5 corporate and Economic Strategy priorities. A notable omission within the policy is reference to “<i>Infrastructure and connectivity</i>”. ECC recommends that the draft Local Plan must include references to improving the choice of business accommodation across the district in the Economic Growth Strategy, despite various issues identified in the economic evidence base.</p>
ECCREP_63	EC1 - Supporting Employment Growth	<p><u>Mixed Use Employment</u></p> <p>ECC is mindful that chapter 12 of the draft Local Plan sets out identified sites that require further testing. It is also noted that some of these sites include potential opportunities for future employment land allocations. ECC recommend that RDC explore opportunities for the provisions of more mixed-use development as a basis to identify and supply employment land to meet local employment needs. The adoption of this approach is consistent with the NPPF to align housing growth and local employment needs and the need to include infrastructure delivery strategies and mechanisms.</p>
ECCREP_64	EC2 – Protecting Employment Land – Bullet (b)	<p><u>B8 – Storage and Distribution</u></p> <p>ECC welcomes that policy EC2 makes specific reference to B8 uses. It is recommended that the policy EC2 bullet b – be amended to take a more positive approach to the delivery of B8 uses. Sufficient land should be allocated for land-intensive</p>

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		uses such as large-scale distribution warehouses, open storage and data centres; with the policy articulating the likely suitable/expected characteristics of the locations Rochford.
ECCREP_65	EC2 - Protecting Employment Land	<p><u>Employment Land and Related Infrastructure</u></p> <p>ECC notes and supports the policy provisions to intensify existing employment sites. However, it is recommended that the policy ensures that sufficient infrastructure is delivered to support this approach, consistent with the infrastructure-led approach articulated within policy MG1. ECC appreciates that the evidence to support the plan e.g. Infrastructure Delivery Plan and Transport Assessment, will assist in developing possible infrastructure policy provisions.</p>
ECCREP_66	Para 7.1.25	<p><u>Employment Allocations Topic Paper</u></p> <p>ECC notes the reference to the Employment Allocations Topic Paper, and welcomes working with RDC to inform this paper to ensure the employment land delivered within the plan period meets joint objectives for RDC and ECC.</p>
ECCREP_67	Para 7.1.40 and Para 7.1.41	<p><u>Typo</u></p> <p>ECC notes two references to policy EC2, that actually state ED2 in error.</p>
ECCREP_68	EC3 - Home Businesses and New Ways of Working	<p><u>Expansion of Working Home Policy Provisions</u></p> <p>ECC recommends that policy EC3 bullet 3 be expanded to include some of the provisions set out within the Essex Design Guide, to ensure new residential development within Rochford supports those communities working from home.</p> <p>ECC recommends that the policy be elaborated to consider the following that is articulated within the Essex Design Guide -</p> <ul style="list-style-type: none"> • Connectivity: All new homes must have high-speed, full-fibre internet connections. • Flexibility & Space: Internal designs should be flexible to accommodate home offices, allowing spaces to adapt to changing needs. • Environment: Homes should be designed to prevent overheating to ensure a comfortable working environment, often using dual-aspect layouts for ventilation. <p>Community Hubs: Larger developments are encouraged to include co-working spaces or community centres to support flexible working.</p>
ECCREP_69	EC3 - Home Businesses and	<p><u>Justification in Approach Query Overly Restrictive</u></p> <p>ECC notes that bullet 2b of policy EC3 states –</p>

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	New Ways of Working	<p>2) <i>“Proposals for live/work units (Sui Generis) will be supported in locations deemed suitable for the relevant commercial component of the unit, provided the following criteria are met...</i></p> <p><i>b) the occupancy of the living area will be restricted to the individual(s) working full-time in the business, and their resident dependents... (Policy EC3)”</i></p> <p>ECC seeks a justification for this approach that is seeking to ensure that the occupancy of the living area is working full time in the business. It is envisaged that there may be issues if an occupier retires or goes part-time. Would they then be in breach of the consent or would they be allowed to remain with the restriction on full-time employment then applying to the subsequent occupier. Clarification will be required on whether this restriction is fair and can be justified, and how it will be monitored for compliance.</p>
ECCREP_70	EC7 - Southend Airport - Bullet 1	<p><u>Aerodrome and Military Safeguarding</u></p> <p>ECC notes that EC7 includes bullet 1 that sets out RDC’s approach to airport safeguarding. To assist RDC in reviewing and drafting this policy aspects, attention is drawn to the Uttlesford District Council Inspectors Report dated 16 January 2026, where the inspectors supported a main modification to the Uttlesford Local Plan and the inclusion of a policy for ‘<i>Aerodrome and Military Safeguarding</i>’. This policy wording was proposed by London Stansted Airport operators Manchester Airport Group, and the precise wording agreed by the inspectors. It was deemed that the policy provided greater clarity and effectiveness.</p> <p>The renewed policy wording and supporting paragraph by way of introduction to the policy; recognises the need to safeguard aircraft manoeuvres from development which may cause a hazard, for example tall structures within close proximity to an aerodrome or which might increase the risk of bird strike. It uses the safeguarding zones produced by the Civil Aviation Authority as a geographical expression of the policy. ECC provides the wording in this response, to assist RDC in working with London Southend Airport operators to draft a similar policy for inclusion within the RDC Local Plan.</p> <p>Proposed policy wording that may be adapted for the emerging RDC Local Plan.</p> <p><u><i>“Aerodrome and Military Safeguarding</i></u></p>

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		<p><i>Safeguarding ensures the safety of aircraft manoeuvring on the ground, taking off, landing or flying in the vicinity of the aerodrome. Aerodrome safeguarding is a legal requirement and regulated by ICAO (International Civil Aviation Organisation) and the Civil Aviation Authority.</i></p> <p><i>A number of safeguarding areas exist in Uttlesford, these being London Stansted Airport, Duxford Aerodrome and Carver Barracks Airfield. The Safeguarding Zones around them are defined on a safeguarding map issued by the relevant safeguarding authority. They define certain types of development which by reason of their height, attraction to birds or inclusion of or effect upon.</i></p> <p><i>Policy provisions regarding the safeguarding process are set out in the ODPM/DfT Circular 1/2003 (or any subsequent revisions) Safeguarding aerodromes, technical sites and military explosives storage areas. In accordance with this Circular, the relevant safeguarding authority is a statutory consultee for certain planning applications for development that require safeguarding to protect the safety of the site’s operation.</i></p> <p><i>The safeguarding zone for London Stansted Airport covers the whole District. The main implications for the types of development within the zone that will require consultation with the Airport Operator are:</i></p> <ul style="list-style-type: none"> <i>• any proposal likely to attract birds, such as proposals involving mineral extraction or quarrying; waste disposal sites and management facilities, significant areas of landscaping, reservoirs or other significant areas with water land restoration schemes, sewage works, nature reserves, or bird sanctuaries</i> <i>• applications connected with an aviation use</i> <i>• renewable energy schemes including all wind turbine applications, and solar arrays and biomass energy plants, and <ul style="list-style-type: none"> <i>• development over a certain height in different areas of the District as specified on the safeguarding maps.</i> </i> <p><i>Core Policy 32a: Aerodrome Safeguarding</i> <i>Development within the Safeguarding Zones that would affect the operational integrity or safety of aircraft operating in or around London Stansted Airport, Duxford Aerodrome or Carver Barracks Airfield will not be permitted”.</i></p> <p><i>(Source – Uttlesford District Council Local Plan – Main Modifications to the Submission Plan MM22)</i></p>
ECCREP_71	EC7 - Southend Airport - Bullet 2	<u>Night Noise and Night Operations</u>

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		<p>In developing the draft Local Plan, it is important to note that the Department for Transport - Aviation Policy Framework emphasises that <i>“land-use planning and management is one of the elements of the ICAO balanced approach which should be explored when tackling noise problems at an airport”</i> (Para 3.20). Similarly, the NPPF also seeks to ensure that planning policies <i>“preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability”</i> (Paragraph 187).</p> <p>The International Civil Aviation Organization (ICAO)’s developed the ICAO Balanced Approach to aircraft noise management. It was developed to provide all nations – including the UK with a coherent approach to address aircraft noise. The principle of the Balanced Approach entails identifying noise mitigation measures through four pillars and analysing them to address the noise problem in a cost-effective manner that aims to preserve connectivity benefits from airports. The approach is centred around four pillars, that include –</p> <ol style="list-style-type: none"> 1) Reduction of Noise at Source; 2) Land-Use Planning and Management; 3) Noise Abatement Operational Procedures; and 4) Operating Restrictions. <p>In developing the airport policy for Southend airport, it is important that full consideration is given to noise management and operating restrictions that must be set out when considering any future air transport movements, or changes in the operations at the airport.</p> <p>ECC recommend that bullet 2d include reference to operating restrictions – specifically control over hours of operation. ECC are mindful that of local community concern is any changes to night operations. Attention is drawn to night operating restrictions at London City airport, and that these were facilitated to mitigate impacts on the local community for increasing throughput at the airport.</p>
ECCREP_72	Para 7.2.38	<p><u>National Aviation Policy and Guidance</u></p> <p>ECC considers that the current wording within the paragraph, is unclear and should reflect more specifically the guidance set out within the Department for Transport’s - Beyond the horizon: the future of UK aviation- Making Best Use of Existing Runway guidance (2018) (MBU). It is recommended that the source of the guidance be clearly stated, namely MBU, and use a direct quote to ensure clarity in the interpretation.</p>

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		<p>To assist the re-draft attention is drawn to the following within the DfT MBU guidance -</p> <ul style="list-style-type: none"> • Para 1.25 - <i>“government believes there is a case for airports making best of their existing runways across the whole of the UK”</i>. • Para 1.26 <i>“ Airports that wish to increase either the passenger or air traffic movement caps to allow them to make best use of their existing runways will need to submit applications to the relevant planning authority. We expect that applications to increase existing planning caps by fewer than 10 million passengers per annum (mppa) can be taken forward through local planning authorities under the Town and Country Planning Act 1990”. As part of any planning application airports will need to demonstrate how they will mitigate against local environmental issues, taking account of relevant national policies”</i>. <p>It is important to note that <i>“applications to increase caps by 10mppa or more or deemed nationally significant would be considered as Nationally Significant Infrastructure Projects (NSIPs) under the Planning Act 2008 and as such would be considered on a case-by-case basis by the Secretary of State”</i> (para 1.27).</p> <p>ECC welcomes assisting RDC in drafting the national policy context to assist in developing this section of the Local Plan.</p>
ECCREP_73	Para 7.2.45 &7.2.47	<p><u>Joint Planning Framework</u></p> <p>ECC notes the reference the Joint Area Action Plan for the Airport and the Environs (JAAP). It is also welcomed that this section of the draft Local Plan addresses the uncertainty and challenges that have arisen post the pandemic. It is also appreciated that the JAAP was adopted in 2014 and therefore an update to the planning framework may be required.</p> <p>It is note that the terminology <i>‘planning framework’</i> has been utilised within these paragraphs. That is welcomed, as ECC is mindful that <u>The Town and Country Planning (Local Planning) (England) Regulations 2026</u> have been published. ECC considers the flexibility in precise nature of the guidance is supported. However, given the importance of the airport’s operations to RDC, and wider partners, community and organisations, it is recommended that a more proactive timeline for the JAAP’s replacement is provided.</p> <p>It is recommended that the paragraph also includes reference to the airport operators right to produce a renewed masterplan that can then inform emerging planning policy. Attention is drawn to the Aviation Policy Framework which recommends airport operators produce masterplans and update these at least every 5 years. It recommends that</p>

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		<p>masterplans set the future development anticipated at the airport, and that they are a consideration in the development of emerging local plans.</p>
ECCREP_74	7.2.48	<p><u>Southend Airport Multi Modal Transport Hub</u></p> <p>ECC welcomes the reference to the vision of developing London Southend airport as a multi modal transport hub. It is acknowledged that Government recognises the role that airports play as multi modal transport hubs. It is therefore important that emerging Local Plans policy seeks to support this. ECC welcome this reference within the draft Local Plan.</p> <p>ECC appreciate that developing the Essex airport (Southend and Stansted) as multi modal transport hubs, benefit the local community. Setting a vision where future growth within and around the airport will enhance connectivity and accessibility to the airport and its environs, providing quality, reliable and a choice of transportation infrastructure and in particular the delivery of sustainable and active travel modes.</p> <p>ECC is mindful that any improvement of the bus rail interchange may involve land to the east of the Southend Airport station. This land is currently Green Belt (MG2). So, any work undertaken to address this would need to take into account Green Belt policy. Attention is drawn to chapter 13 of the NPPF to ensure consideration is given to the requirements for any release of Green Belt land.</p>
<p>SECTION C – CREATING QUALITY PLACES – Chapter 8 – Vibrant Town Centres</p>		
ECCREP_75	Para 8.1.9	<p><u>Source of Population Projections</u></p> <p>ECC queries the source of the population trend data referenced in paragraph 8.1.9 and table 5. ECC acknowledge that the paragraph states that the exact distribution of growth is yet to be determined, clarity on their source and how the impact the known spatial distribution will have upon future retail and leisure space needs.</p>
ECCREP_76	Policy TC1 - Future Retail and Leisure Needs b)	<p><u>Addressing Cumulative Impacts</u></p> <p>ECC draws attention to the current policy wording which states –</p>

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		<p><i>“Where new housing allocations or proposals are more than 1,500m from an identified existing town or village centre, or neighbourhood parade, the Council will require the provision of proportionate flexible retail/commercial floorspace on identified sites of 500 dwellings or more...”</i> (TC1 bullet2).</p> <p>The current wording refers to <i>‘identified sites of 500 dwellings or more’</i>, it is important to note that within 1,500m from an existing town/village centre etc. it would be possible for a number of separate dwelling allocations to equate to 500 dwellings or more. ECC recommends that the wording of the policy be amended to ensure cumulative growth can provide for future retail and leisure floorspace needs. It is acknowledged that once the preferred spatial approach has been identified within RDC this may be more easily identified and articulated in emerging policy.</p>
ECCREP_77	TC3 - Development in Town, Village Centres and Neighbourhood Parades	<p><u>Urban Greening</u></p> <p>ECC recommends that town centre policies incorporate an Urban Green Factor or equivalent urban greening requirement to ensure that development within centres delivers high-quality, multifunctional green infrastructure and contributes to climate resilience, biodiversity and improved public realm.</p> <p>ECC recommends that TC3 be amended to include an additional criterion –</p> <p><i><u>“Major development in town centres and regeneration areas must achieve a minimum Urban Greening Factor score (or successor urban greening metric) to deliver high-quality, multifunctional greening.”</u></i></p>
<p>SECTION C – CREATING QUALITY PLACES – Chapter 9 – Homes for Growing Community</p>		
ECCREP_78	Chapter 9 – Homes and Growing Community	<p><u>General Comment – Large Scale Housing Allocations</u></p> <p>ECC appreciates that the draft Local Plan consultation is not seeking allocate sites (as outlined in paragraph 12.1.2). Instead within chapter 12 the site principles and an appreciation of the sites that require further testing are articulating.</p> <p>In reviewing chapter 9 entitled Homes for a Growing Community it is notable that there is no consideration for the larger sites. ECC recommends that following an appreciation of the larger scale sites that will be allocated within RDC, the emerging Local Plan must set out within policy(s) the approach within the larger scale developments for delivering new homes.</p> <p>Attention is drawn to NPPF (2024) paragraph 77 to assist in developing the policy(s), and in particular – <i>“Strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:</i></p> <p><i>a) consider the opportunities presented by existing or planned investment in infrastructure, the area’s economic potential and the scope for net environmental gains;</i></p>

ECC Representation Reference	Document Ref	Comments/Recommended Changes and Additions
		<p><i>b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;</i></p> <p><i>c) set clear expectations for the quality of the places to be created and how this can be maintained (such as by following Garden City principles); and ensure that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-designed homes to meet the needs of different groups in the community;</i></p> <p><i>d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally led development corporations); and</i></p> <p><i>e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size (para 77).</i></p> <p>There may also be an opportunity to adopt different housing mixes and include other matters such as stewardship.</p> <p>Establishing robust and sustainable stewardship structure early in the planning and delivery process for large scale strategic sites. An infrastructure delivery organisation, ECC has a critical interest in the design and delivery of successful stewardship arrangements in new developments, particularly garden communities and villages. ECC statutory roles and responsibilities all interact with stewardship arrangements in some form and as such early engagement with ECC is necessary to complement proposals for more localised management of relevant assets and services by stewardship bodies. Additional policy requirements should require stewardship activities to be in place for the first housing occupations to ensure timely delivery of community development activities and for an Asset Schedule to be prepared by applicants with the express agreement of RDC and ECC.</p> <p>ECC also recommends that developing a largescale housing policy must include reference and be informed by the following guidance/policy –</p> <ul style="list-style-type: none"> • ECC Developers Guide for Infrastructure, • the ECC Local and Neighbourhood Planners’ Guide to School Organisation and Place Planning, • relevant sections of the Essex Design Guide and • the Essex Planning Officers Association Parking Guidance Part 2 for Garden Communities and Large-Scale Developments. <p>ECC welcome engaging in developing such a policy.</p>

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ECC Representation Reference	Document Ref	Comments/Recommended Changes and Additions
ECCREP_79	Chapter 9 – General Comment	<p><u>Waste Management and Disposal</u></p> <p>ECC notes there is reference to HMOs and waste segregation, however there is no reference to waste segregation facilities for people living in flats, including flats above shops. ECC recommends the draft Local Plan be amended to include reference to waste segregation for flats and flats above shops.</p>
ECCREP_80	Policy H1 - Housing Mix	<p><u>Delivery of Accessible and Adaptable Specialist and Supported Living Accommodation</u></p> <p>ECC notes that policy H1 includes a requirement in clause 2(b) for 100% of homes on developments of 10 or more units to meet M4(2) accessible and adaptable standards, and clause 4(a) references the provision of M4(3) wheelchair user homes, which is welcomed. However, the policy does not set out a clear proportion or expectation for the delivery of M4(3) homes, nor does it reference SSHANA (2025) to inform the scale and type of accessible housing needed to support older people and people with disabilities to live independently at home and reducing the needs for adaptations or moving home.</p> <p>ECC notes that the reasoned justification (paragraphs 9.1.4 and 9.1.5) acknowledges the importance of accessible and adaptable homes for older people and people with disabilities, which is welcomed. However, Policy H1 itself does not set out how accessible general needs housing will support people with disabilities to remain independent at home and reduce or delay the need for home adaptations or moving home. Strengthening the policy wording would help ensure this intention is clearly secured through delivery.</p> <p>Furthermore, policy H1 fails to reference inclusive or dementia inclusive design principles, and to support the ease of movement, clear wayfinding and reduced environmental stress for people with sensory or cognitive needs.</p> <p>ECC also recognises there is no evidence base link to ECC’s Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025) to inform housing mix, accessibility requirements and tenure, including affordable homes. Similarly, there is no reference to relevant Essex and ECC guidance that sets out expectations for accessible and inclusive homes and communities, including the Essex Design Guide – Inclusive Design, the ECC Extra Care Design Guide and ECC Supported Living Accommodation Standards.</p> <p>ECC recommends that policy H1 be amended to –</p> <ul style="list-style-type: none"> • Include ensure new homes meet the needs of older people and people with disabilities, development proposals will deliver 100% M4(2) accessible and adaptable homes across all tenures and housing types.

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		<ul style="list-style-type: none"> • Include a minimum of 5% of all homes will meet M4(3) wheelchair user standards, and at least 10% of affordable homes will be delivered as M4(3)(b), unless a higher proportion is identified in ECC’s Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025). • Ensure the housing mix will include accessible, adaptable, inclusive, general needs and supported and specialist homes consistent with the needs of older people and people with disabilities, as identified in SSHANA (2025). • Set out that development proposals must demonstrate how home layouts, circulation spaces and approaches support independent movement for people with physical disabilities, sensory impairments, autism or cognitive impairment. Developments will incorporate dementia-inclusive design principles such as clear wayfinding, legibility, and features that support orientation and reduce environmental stress, consistent with the Environments for Ageing and Dementia Design Assessment Toolkit (EADDAT). • Set out that proposals must demonstrate alignment with the SSHANA (2025) and relevant Essex guidance, including the Essex Design Guide – Inclusive Design, the ECC Extra Care Design Guide (2023) and the ECC Supported Living Accommodation Standards (Adults with Disabilities, 2024). • Include that on larger developments, an Accessibility Statement will be provided, confirming how M4(2) and M4(3) homes will be delivered, how accessible homes are distributed across the development and across tenures, and how delivery will be secured through implementation and phasing. <p>To support these amendments the reasoned justification can refer to the following evidence –</p> <ul style="list-style-type: none"> • ECC Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025); • Essex Design Guide – Inclusive Design; • ECC Extra Care Design Guide (2023); ECC Supported Living Accommodation Standards (Adults with Disabilities, 2024); and • Environments for Ageing and Dementia Design Assessment Toolkit (EA-DDAT).
ECCREP_81	Policy H4 - Specialist Housing	<p><u>Supported and Specialist Housing and Accommodation</u></p> <p>ECC recognises that policy H4 recognises the need for specialist housing, however it fails to reflect the full range of supported and specialist housing and accommodation needs identified in the ECC Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025) and those set out within paragraph 63 of the NPPF (2024). It is essential that the Local Plan includes clear mechanisms to ensure these housing and accommodation needs can be met.</p>

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ECC Representation Reference	Document Ref	Comments/Recommended Changes and Additions
		<p>To ensure consistency with the NPPF (2024) and to meet identified needs, ECC recommends the policy must amend the following –</p> <ul style="list-style-type: none"> • Amend the policy title to reflect the SSHANA and range of accommodation options – to Policy H4 Supported and specialist housing and accommodation. • Amend bullet e of the policy to read – <i><u>e. the development demonstrates integration with the surrounding area and supports social inclusion.</u></i> • Amend the policy to include additional provisions that must reference accessible housing standards (M4(2) and M4(3)) or inclusive and dementia -inclusive design, essential to ensure specialist homes meet needs and support independence. • Insert reference to relevant ECC and Essex guidance that sets expectations for quality and design of supported and specialist housing and accommodation. <p>The evidence that must be referenced include -</p> <ul style="list-style-type: none"> • ECC Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025); • Essex Design Guide – Inclusive Design; • ECC Extra Care Design Guide (2023); • ECC Supported Living Accommodation Standards (Adults with Disabilities, 2024); and • Environments for Ageing and Dementia Design Assessment Toolkit (EADDAT).
ECCREP_82	Policy H7 - Houseboats Para 9:2.33	<p><u>Crouch Harbour Authority</u></p> <p>ECC notes that paragraph 9.2.33 references the Crouch Harbour Authority, is there an equivalent authority for engagement on the River Roach.</p>
ECCREP_83	Policy H7 : Houseboats	<p><u>Water Quality</u></p> <p>ECC recommend an addition to bullet 1, namely reference to ensuring that there will not be a deterioration in water quality, consistent with the Water Framework Directive. Furthermore, this will mitigate any impacts on the designated sites (Special Area of Conservation, Special Protection Area).</p>

SECTION C – CREATING QUALITY PLACES – Chapter 11 – Natural Environment and Open Space

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ECC Representation Reference	Document Ref	Comments/Recommended Changes and Additions
ECCREP_84	Chapter 11 General Comment	<p><u>General Comment – Monitoring and Implementation</u></p> <p>ECC notes that policies in Chapter 11 currently lack defined GI and BNG monitoring indicators; introducing clear, measurable indicators would enable more transparent performance tracking and support effective adaptive management.</p> <p>Potential monitoring indicators for GI, BNG and LNRS could be:</p> <ul style="list-style-type: none"> • Increase or decrease in local biodiversity units. Monitored annually through assessment of Biodiversity Net Gain compliance evidence submitted with planning applications Linked to Biodiversity Duty Report -these reports should include quantitative data on the BNG impacts of all developments approved since the introduction of mandatory BNG in February 2024. • Amount of green space created or enhanced within new developments. Planning Application monitoring and Developer contributions received for open space projects through infrastructure Funding Statement/S106 records/ Open Space Strategy. • Number of developments contributing to priority habitat areas identified in the LNRS. Planning application monitoring. • The delivery of projects contained within the Essex RAMS SPD.
ECCREP_85	NE1 - Protecting the Natural Environment	<p><u>Essex Local Nature Recovery Strategy</u></p> <p>ECC support the policy’s protection for designated and locally important habitats, including Local Wildlife Sites, application of the mitigation hierarchy, and recognition of ecosystem services. Proposals should also demonstrate how they contribute to LNRS priorities and Nature Recovery Network connectivity.</p> <p>ECC recommend an addition to bullet 1 – Include the following text - <i>“Proposals should have regard to the Essex Local Nature Recovery Strategy (LNRS) and demonstrate how they support locally identified priorities for nature recovery and ecological network enhancement.”</i></p>
ECCREP_86	NE1 – Protecting the Natural Environment Bullet 6 NE3 – Biodiversity and Ecology - Bullet 2	<p><u>Incorrect Referencing – Policies NE1 and NE3</u></p> <p>For clarity ECC recommends that bullet 6 of policy NE1 and NE3 bullet 2 be amended due to incorrect wording and the need for inclusion of the hyperlink. The current wording “Defra Biodiversity Metric” must be amended to read <u>“Statutory biodiversity metric tools and guides”</u> and a footnote to the following hyperlink –</p> <ul style="list-style-type: none"> • Source: Statutory biodiversity metric tools and guides - GOV.UK
ECCREP_87	NE2 - Essex Coast RAMS Figure 5	<p><u>Map and Spatial Understanding</u></p> <p>In reviewing the presentation of the information provided within Figure 5 – it is difficult to gain a spatial perspective, as the reader is unable to see the map highlighting the conurbations within Rochford.</p>

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ECC Representation Reference	Document Ref	Comments/Recommended Changes and Additions
ECCREP_88	NE2 - Essex Coast RAMS Reasoned Justification Paragraph 11.1.16	<p><u>Typo/Minor Error</u></p> <p>ECC have noted a minor error and for clarity recommend amendment to read –</p> <ul style="list-style-type: none"> • <i>“This approach aligns with the NPPF, ensures compliance with the Conservation of Habitats and Species Regulations 2017 and the Ramsar Convention and supports the delivery of the Essex Coastal <u>Coast</u> RAMS Strategy.”</i>
ECCREP_89	NE2 - Essex Coast RAMS Reasoned Justification Paragraph 11.1.17	<p><u>Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy and Financial Contribution</u></p> <p>ECC recommends the inclusion of additional information on the financial contribution required for the Essex Coast RAMS, as well as the addition of a weblink for further information as a footnote in paragraph 11.1.17.</p> <p>ECC recommends the following wording be included within paragraph 11.1.17 –</p> <ul style="list-style-type: none"> • <i>“The Essex Coast RAMS sets out a detailed programme of strategic avoidance and mitigation measures designed to protect internationally important coastal habitats. Policy NE2 requires all qualifying development to either support the mitigation measures set out in the Essex Coast RAMS or provide sufficient technical evidence for an appropriate assessment under the Habitats Regulations. This ensures that the impacts of development are properly assessed and mitigated before planning permission is granted. Financial contributions collected through planning obligations fund a package of strategic mitigation measures, as detailed in the RAMS Supplementary Planning Document”</i> • And the addition of a footnote weblink - Essex Coast RAMS Rochford Council
ECCREP_90	NE3 - Biodiversity and Ecology	<p><u>Management Plans and Ecological Enhancements</u></p> <p>ECC support mandatory 10% BNG, 30-year maintenance and LNRS-led hierarchy. It noted the policy sets expectations to prioritise onsite habitat creation and support for off-site provision that reinforce ecological connectivity and LNRS opportunity areas.</p> <p>In reviewing NE3 ECC acknowledge there is no explicit requirement for long-term management plans (LEMP/HMMP) to ensure measurable outcomes and stewardship. To ensure biodiversity measures will be secured through a legal agreement and/or planning condition, obligations, or conservation covenants. ECC recommends and addition to the policy.</p> <p>ECC also recommend securing the delivery of requirements for developments to enhance ecological features not captured by the BNG metric, such as bird and bat boxes etc.</p> <p>ECC recommends the following additions –</p>

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ECC Representation Reference	Document Ref	Comments/Recommended Changes and Additions
		<ul style="list-style-type: none"> <i>"All BNG and associated GI proposals must be supported by a Habitat Management and Monitoring Plan (HMMP) and/or Landscape and Ecological Management Plan (LEMP), secured for a minimum of 30 years, with monitoring and reporting triggers agreed with the LPA."</i> <i>"Proposals should incorporate other ecological enhancements, such as bird boxes, bat boxes, swift bricks, and other habitat supporting features appropriate to the site."</i>
ECCREP_91	NE3 - Biodiversity and Ecology - Bullet 3 and 5	<p><u>Typo/Minor Errors</u></p> <p>ECC recommends for clarity and effective delivery of policy NE3 –</p> <ul style="list-style-type: none"> Bullet 3 must include a hyperlink for the text <i>"Essex Local Nature Recovery Strategy (LNRS)"</i>. Hyperlink source - https://www.essex.gov.uk/sites/default/files/2025-07/Essex%20Local%20Nature%20Recovery%20Strategy.pdf ECC also recommend the addition of a weblink for LNRS mapping: Greater Essex Local Nature Recovery Strategy (LNRS) <p>Bullet 5 ECC recommends inclusion of the correct reference to the Biodiversity Gain hierarchy. It must be demonstrated in the Biodiversity Gain Plan, how the Biodiversity Gain Hierarchy has been followed in the approach to achieving 10% BNG.</p> <p>ECC recommends the –</p> <ul style="list-style-type: none"> Addition of the weblink: Biodiversity net gain - GOV.UK Amendments to bullet 5 to read - 5. <i>"To achieve a net-gain in biodiversity, development proposals should adhere to the mitigation Biodiversity Gain hierarchy to ensure the minimisation and mitigation of the adverse effects of the development. Development proposals must make sure losses of, and impacts to, biodiversity are:....."</i>.
ECCREP_92	NE3 - Biodiversity and Ecology Reasoned Justification Paragraph 11.1.25	<p><u>Inclusion of Habitat Banks</u></p> <p>ECC recommends that the Reasoned Justification section, paragraph 11.1.25 be amended to include information on how to achieve Biodiversity Net Gain through habitat banks. The suggested word is –</p> <ul style="list-style-type: none"> Bullet 5 - <i>"The preferred approach prioritises on-site delivery of biodiversity enhancements, recognising that local habitat creation and restoration provide the greatest ecological benefits and strengthen existing green infrastructure networks. Where on-site delivery is demonstrably unfeasible, the policy supports off-site solutions within Rochford District, guided by the Essex Local Nature Recovery Strategy (LNRS). This ensures that biodiversity gains remain local and contribute to district-wide ecological connectivity. <u>The applicant can secure off-site biodiversity units through local Habitat Banks registered on the biodiversity gain site register, to meet statutory requirements.</u> The use of statutory biodiversity credits is restricted to wholly exceptional circumstances, maintaining the integrity of local nature recovery objectives."</i>
ECCREP_93	NE4 - Landscape Character	<p><u>Consideration to Cross Boundary Green and Blue Infrastructure</u></p>

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ECC Representation Reference	Document Ref	Comments/Recommended Changes and Additions
		<p>ECC welcomes the protection and enhancement of landscape character including ancient/coastal landscapes. Applicants must be required to demonstrate integration with cross-boundary GI networks (e.g. South Essex Strategic GBI Study) and contribute to habitat connectivity and nature recovery.</p> <p>ECC recommends the following addition to NE4 bullet 4 -</p> <p><i><u>“Proposals must also demonstrate how they strengthen cross boundary Green and Blue Infrastructure (GBI) networks, including alignment with strategic evidence such as the South Essex Strategic GBI Study, and how they contribute to improved habitat connectivity and nature recovery at the landscape scale”</u></i></p>
ECCREP_94	NE5 - Trees, Woodland and Hedgerows	<p><u>Trees, Woodland and Hedgerows</u></p> <p>ECC support the protection of ancient and veteran trees and the requirement for the use of native species planting, along with consideration of the new tree long term maintenance to strengthen habitat quality, ecological resilience and the wider Green Infrastructure network.</p>
ECCREP_95	NE6 - Wallasea Island	<p><u>Nature Recovery</u></p> <p>ECC support the safeguarding and enhancement of internationally important wetland and bird habitats at Wallasea Island. It is recognised that the Essex Coast, and the protected habitats along it, form a key part of the East Coast Flyway which has recently been added to the Government’s Tentative list for Natural World Heritage Status.</p> <p>Recommendations are provided to strengthen the policy by explicitly linking it to nature-recovery and visitor-management priorities identified within the Essex Local Nature Recovery Strategy (LNRS).</p> <p>ECC recommend the following addition to NE6 policy –</p> <ul style="list-style-type: none"> • <i>2..... New development, where exceptionally permitted, must demonstrate a significant biodiversity net gain, <u>contributing to nature recovery</u> and provide suitable mitigation or compensation for any unavoidable impacts on coastal wildlife sites.</i>
ECCREP_96	NE7 - Delivering Green and Blue Infrastructure Para 11.1.58, 11.1.59	<p><u>Landscape-Led Approach</u></p> <p>ECC acknowledge and support RDC Policy NE7’s landscape-led approach and the recognition of the multifunctional role of Green and Blue Infrastructure (GBI) in delivering climate resilience, biodiversity enhancement, sustainable drainage (SuDS), and active travel. The policy appropriately reflects best practice in early-stage GBI-led design within GI Plan. ECC also welcome the supporting text referencing the Essex Green Infrastructure Strategy and Essex GI Standards.</p>

ECC Representation Reference	Document Ref	Comments/Recommended Changes and Additions
		<p>To strengthen the policy further, ECC recommend that both the policy wording and supporting text reference the Essex Local Nature Recovery Strategy (LNRS) and associated LNRS mapping, as these provide a statutory, spatial evidence base identifying opportunities for habitat connectivity, nature recovery, and landscape-scale enhancement. Aligning NE7 with LNRS priorities will help ensure new development contributes to a coherent, cross-boundary GBI network and supports strategic ecological outcomes. While the alignment with the LNRS and the Essex Green Infrastructure Strategy strengthens its spatial relevance and ensures nature recovery priorities are integrated into planning decisions.</p> <p>The Essex Local Nature Recovery Strategy (ELNRS) strategy and maps aims to implement county-wide nature recovery initiatives, highlighting key biodiversity areas and opportunities for habitat creation or improvement. The ELNRS features three main types of maps:</p> <ul style="list-style-type: none"> • Strategic Opportunities - These are areas identified as having potential to become important for biodiversity through habitat creation: <ul style="list-style-type: none"> ○ Woodland ○ Grassland ○ Scrub ○ Freshwater (Standing Water & River Buffers) ○ Coastal and Marine habitats • Areas of Particular Importance for Biodiversity (APIBs) - These include nationally and locally designated sites. • Potential Opportunities – identifies urban and other areas where habitat creation could be beneficial: <p>These present opportunities to enhance biodiversity and create habitats, contributing positively to the local environment. Conservation efforts might be more concentrated on nearby areas identified as top priorities for habitat creation as identified in these maps that can be viewed here: https://place-services.maps.arcgis.com/apps/webappviewer/index.html?id=d7e07ae774ea43249765b4b8f6514513%20</p> <p>To strengthen GI outcomes in urban areas, Policy NE7 must incorporate an Urban Greening Factor (UGF) requirement or guidance, ensuring consistent and quantifiable delivery of urban greening across major developments.</p> <p>ECC recommends the inclusion of an additional bullet j to NE7 bullet 3, which states –</p> <ul style="list-style-type: none"> • <i><u>incorporate appropriate urban greening measures and, where suitable, apply an Urban Greening Factor (UGF) to quantify and secure high-quality green infrastructure within the development.</u></i>
ECCREP_97	Policy NE7 - Delivering	<u>Habitat Mitigation</u>

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ECC Representation Reference	Document Ref	Comments/Recommended Changes and Additions
	Green and Blue Infrastructure Page 239	<p>ECC recommends ensuring consistency with paragraph 2.13 of Essex Coast Recreational disturbance Avoidance and Mitigation Strategy, Supplementary Planning Document -SPD (Place Services, May 2020). Policy NE7 be amended to include information on provision of Suitable Alternative Natural Greenspaces (SANGs), to avoid impacts on <u>Habitats sites within the Zone of Influence for Essex Coast RAMS</u>.</p> <p>The recommended policy wording for point 2 of policy NE7 is –</p> <ul style="list-style-type: none"> • <i><u>“New large scale residential developments within the Zone of Influence of Essex Coast RAMS should provide Suitable Alternative Natural Greenspaces (SANGs) to avoid recreational impacts from the development alone. This is in addition to the strategic mitigation set out in the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy -SPD (Place Services, May 2020).”</u></i>
ECCREP_98	Paragraph 11.1.66	<p><u>Habitat Regulation Assessment Requirements</u></p> <p>ECC recommends that the reasoned Justification must include details on Suitable Alternative Natural Greenspaces (SANGs), to avoid recreational impacts on Habitats sites within the Zone of Influence of Essex Coast RAMS.</p> <p>ECC recommends that after point 11.1.66 relating to HRA requirements, additional text be included to read –</p> <ul style="list-style-type: none"> • <i><u>“Suitable Alternative Natural Greenspaces (SANGs) is required of new residential developments to deliver the mitigation necessary to avoid the likely significant effects from the ‘in-combination’ impacts of residential development that is anticipated across Essex; thus, protecting the Habitats sites on the Essex coast from adverse effect on site integrity”.</u></i>
ECCREP_99	NE8 - Flood Risk	<p><u>Flood Risk and Nature Based Solutions</u></p> <p>ECC recommends the inclusion of Green and Blue Infrastructure (GBI) within the flood policy. To strengthen its effectiveness, we recommend requiring major development proposals to clearly demonstrate how opportunities for integrating nature-based solutions, such as SuDS, naturalised drainage features, and green corridors, have been considered in line with Policies NE7 and NE9. Emphasising multifunctional GBI will help ensure developments contribute meaningfully to flood-risk mitigation and wider climate-resilience outcomes.</p> <p>ECC proposes additional wording for bullet 4 –</p> <p><i><u>“All major development proposals must consider the potential for new Green and Blue Infrastructure to help mitigate flood risk and include such Green and Blue Infrastructure and nature-based solutions where appropriate, in accordance with Policy NE7 of this Local Plan.”</u></i></p>
ECCREP_100	NE8 - Flood Risk	<p><u>Coastal Change Management Areas</u></p>

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		<p>ECC draws attention to comments made on paragraph 5.1.3 to provide context and justification.</p> <p>ECC notes that the SMP is referenced in 11.2.2, it is recommended that appropriate designation of Coastal Change Management Areas be considered.</p>
ECCREP_101	NE9 - Sustainable Drainage - 3(C)	<p><u>Sustainable Drainage Systems Design</u></p> <p>ECC welcomes policy NE9 setting out the design of Sustainable Drainage Systems (SuDS) as multifunctional features that support wider green and blue infrastructure benefits. ECC aims to ensure that SuDS are designed as naturalised, multifunctional features integrated with GI networks, consistent with best practice and the Essex SuDS Design Guide. Minor additions to the policy are proposed for clarity and ensure best quality delivery of future SuD's.</p> <p>ECC recommends some minor additions to NE9 bullet 3c as follows –</p> <p><i>SuDS designs should be conscientious and seamlessly integrated into the Green and Blue infrastructure <u>network</u> to create high-quality public open spaces and enhancing the landscaped public realm in accordance with Policy NE7; <u>and with the Essex SuDS Design Guide and CIRIA SuDS Manual.</u></i></p>
ECCREP_102	Policy NE10 – Water Efficiency and Quality 11.2.31 11.2.33 11.2.35 Page 251	<p><u>Minor Errors within the Draft Local Plan</u></p> <p>There are numbered citations in each of the listed paragraphs that do not appear to correspond to any references listed either as a footnote or in a bibliography. ECC recommends that either the numbered citations are removed, or the references they relate be added, so as not to cause confusion.</p>
ECCREP_103	Policy NE10 – Water Efficiency and Quality 11.2.35 Page 251	<p><u>Typo Error</u></p> <p>ECC recommends amending 'reducing demand water' to 'reducing <u>water demand</u>'.</p>
ECCREP_104	Policy NE10 – Water Efficiency and Quality	<p><u>Typo Error</u></p> <p>ECC note that these paragraphs refer to NE9, when it should reference NE10.</p>

ECC Representation Reference	Document Ref	Comments/Recommended Changes and Additions
	11.2.36 11.2.37 11.2.40 Page 252-253	
ECCREP_105	Policy NE10 – Water Efficiency and Quality Page 252	<p><u>Strengthening Water Efficiency Policy</u></p> <p>The inclusion of the Shared Standards in Water Efficiency for Local Plans report under the ‘Context’ section of policy NE10 is welcomed, as is the adoption of its 85 l/p/d target for new homes. It is suggested that other model policies from the ‘Draft policy: Water Resources and Sustainable Growth’ (p. 7) of the Shared Standards report be included within policy NE10, to ensure the most comprehensive approach to improving water efficiency is delivered.</p> <p>It is important to note that the standards for non-residential buildings set by the Shared Standards are more stringent than those in Policy NE10. The Shared Standards recommends that ‘new, extended or redeveloped non-household** buildings aim to achieve full credits within the 4 water categories (WAT01, WAT02, WAT03, and WAT04) for BREAAAM standard within a minimum score of 3 credits within WAT01 Water Consumption issue category, or an equivalent standard set out in any future update to BREAAAM. The applicant will be required to justify and evidence why full credits is not possible/viable for the development.’ [sic]</p> <p>The Shared Standards provides evidence for the necessity of such requirements, as well as their feasibility and viability. As it is a more ambitious approach, it is encouraged that the Shared Standards recommendations for non-residential buildings be adopted in Policy NE10 in place of ‘b. New non-residential developments are expected to achieve a BREAAAM 'Excellent' rating in category Wat 01’.</p> <p>The Shared Standards also provide recommendations on how to demonstrate compliance, such as through the submission of a Water Efficient Design Statement. It is encouraged that similar clauses be included in Policy NE10 to provide more clarity to both policy officers and developers on the information that must be submitted to confirm that the policy has been met. An example is the Shared Standards requirements for non-residential buildings be adopted:</p> <ul style="list-style-type: none"> • New, extended or redeveloped non-household (‘non-household’ means all development except residential dwellings.) buildings aim to achieve full credits within the 4 water categories (WAT01, WAT02, WAT03, and WAT04) for BREAAAM standard within a minimum score of 3 credits within WAT01 Water Consumption issue category, or an equivalent

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ECC Representation Reference	Document Ref	Comments/Recommended Changes and Additions
		<p>standard set out in any future update to BREAM. The applicant will be required to justify and evidence why full credits is not possible/viable for the development. (p. 7)</p>
<p>ECCREP_106</p>	<p>Policy NE10 – Water Efficiency and Quality</p> <p>Points 1c and 2c Page 252</p>	<p><u>Water Efficiency Legislative Advice</u></p> <p>With regards to sections 1c and 2c which discuss water reuse, ECC would like to highlight that the Shared Standards in Water Efficiency for Local Plans outlines legislative barriers to water recycling and recommends that it be reserved for non-domestic development. The information in the report can be used to inform the type of development that the recycling policies in 1c and 2c apply to in future iterations of the local plan.</p> <p>The challenges for residential developments to utilise greywater and rainwater reuse are as follows: section 4 of the Water Supply (Water Quality) Regulations 2016 requires water supplied by companies, such as the Shared Standards in Water Efficiency for Local Plans (2025) partners, to be “wholesome” if supplied for “domestic purposes”¹. The Water Industry Act 1991² includes WC flushing under “sanitary” and then subsequently “domestic” purposes. This is usually interpreted as meaning that water recycling cannot be supplied by water companies for domestic purposes.</p> <p>The current Building Regulations do not have an explicit legal requirement to consider water reuse. There is some guidance relevant to reuse in certain sections, but some of the references are to other documents (e.g. WRAS Guidance) which are now out of date. The situation may improve with the Building Regulations update proposed in the Plan for Water: our integrated plan for delivering clean and plentiful water, a policy paper published by DEFRA in 2023, but the timetable for this is not specified.</p> <p>Statutory Water Companies (and NAVs) cannot legally supply reclaimed water for domestic purposes (because of the wholesomeness requirement) whereas others can – provided human health is not jeopardised and notification is provided and approved. It is assumed that supply for non-domestic purposes is permissible.</p>
<p>ECCREP_107</p>	<p>Policy NE10 – Water Efficiency and Quality</p> <p>11.2.41.</p>	<p><u>Water Usage and Efficiency Planning Policy Statement</u></p> <p>ECC draw attention to the Climate and Planning Unit emerging work on developing a <i>Water Usage and Efficiency Planning Policy Statement</i> which will outline evidenced based model policies for improved water efficiency. The statement will be guided by the degree of water stress that Essex must adapt to and what is feasible for new development in the county.</p>

¹ [Enabling Water Reuse in the UK: Single Source of Truth \(March 2025\)](#) - p. 9

² [Enabling Water Reuse in the UK: Single Source of Truth \(March 2025\)](#) - p. 9

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ECC Representation Reference	Document Ref	Comments/Recommended Changes and Additions
		If this planning policy statement is published it may be used to inform the emerging RDC Local Plan.
ECCREP_108	NE11 - Protecting and Enhancing Open Space	<p><u>Open Space and Relationship with Biodiversity and Climate Change</u></p> <p>ECC support the protection of existing open spaces and the continued designation of Local Green Spaces. These areas are vital for community wellbeing, biodiversity, and climate resilience. To strengthen the policy, we recommend adding wording to ensure that open spaces are not only protected but also managed and enhanced to deliver wider biodiversity and climate functions, including habitat de-fragmentation, increased tree planting, and the introduction of naturalised edges and ecological features.</p> <p>ECC recommend the following additional wording to policy NE11 –</p> <ul style="list-style-type: none"> • <i><u>“Open space enhancement should also seek to deliver biodiversity and climate functions, including improving habitat connectivity, introducing naturalised edges, and maximising opportunities for tree planting and ecological enhancement.”</u></i>

SECTION D – EXPLORING GROWTH OPPORTUNITIES – Chapter 12 – Exploring Future Development Options

ECCREP_109	General Chapter 12 Comment	<p><u>Transport Assessment and Matters for Further Consideration</u></p> <p>ECC acknowledge that SYSTRA have been appointed by RDC to provide transportation and highways advice in relation to the development of the emerging Rochford Local Plan. It is noted that as part of the RDC Local Plan Regulation 18 consultation, RDC have published a Regulation 18 Transport Assessment; with an intention to build an understanding of existing transport conditions, opportunities and challenges, and set out how future changes to transport demand are expected to affect the capacity and operation of transport infrastructure and services.</p> <p>To assist ECC in the response to the draft Local Plan, ECC have reviewed the Transport Assessment for the draft Local Plan and set out a summary the matters that require further address in this response. In summary our response highlights that there are concerns regarding the robustness of the Transport Assessment for this current stage and its assessment of the impact of the sites selected on ECC Transport networks . Examples of some of the concerns include –</p> <ul style="list-style-type: none"> • A significant issue identified in the review of the Transport Assessment is the need for clarification on how delays and queues have been monitored in particular in relation to queues extending across multiple upstream links and the impact on upstream junctions. This makes it difficult to identify the precise scale of the impacts and likely required transport mitigation. • Noted inconsistencies between the dwelling numbers set out within the draft Local Plan and the Transport Assessment; • Ambiguity around how the Level of Service at junctions has been calculated, the criteria for selection for further junction assessment and inconsistencies between the number of key junctions referenced within different sections of the TA report (with some stating 25 and other parts of the report referring to 29 junctions).
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		<ul style="list-style-type: none"> • Ambiguities and uncertainties around the calculation and application of trip rates to the individual sites (for example rural trip rates), which is a key issue as trip rates are a main input into the assessment of impacts and the conclusions/assumptions concluded within the Transport Assessment; • Queries concerning the application of factors to reduce vehicle trips. In particular, assumptions around internalisation of trips for sites and regarding the propensity for mode shift to bus and active travel for individual sites (eg in relation to existing bus frequencies). • Current lack of consideration of mitigation measures. • Current lack of consideration of cross-boundary traffic flows and impacts. <p>This list of matters is not exhaustive, it is set out to provide an appreciation of the matters that require further consideration, discussion and review with ECC.</p> <p>As the Highway and Transportation Authority, ECC emphasises the importance of continued engagement as RDC seek to move towards the Regulation 19 stage of the Local Plan preparation. It is acknowledged that RDC are committed to developing the transport evidence. The timescales that RDC are working and operating to are appreciated. ECC also acknowledge that discussions are ongoing to inform the Regulation 19 Local Plan Transport Assessment. With this in mind ECC recommend that RDC review the detailed comments on the Regulation 18 Transport Assessment, to ensure that matters raised at the Regulation 18 Transport Assessment are addressed, as part of the next stage of the Local Plan. ECC are committed to work with and assist RDC to ensure that a robust and sound transport evidence base is prepared.</p> <p>ECC conclude that for the Regulation 19 Local Plan the Transport Assessment requires further refinement to ensure it is robust and sound. The following is recommended –</p> <ul style="list-style-type: none"> • Appreciate, and identify the spatial distribution and cumulative growth impacts from proposed allocations both within the district and the cross-boundary transport implications such as for land North of Southend and around Wickford (not exhaustive). • Ensure that strategic transport implications from proposed growth are known, identified and mitigation associated with development proposals highlighted - Examples of likely strategic transport matters include the A127, A13, A130 including A127/A130 Fairglen Interchange (strategic transport corridors) or Sadlers Farm Roundabout, and barriers to north south connectivity (not exhaustive). • Ensure an awareness of the specific sites (and where appropriate the cumulative site implications) and their impacts on the networks within RDC and cross boundary to ensure the Regulation 19 Local Plan sets clear, viable transport mitigation attributed to relevant sites.

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		<ul style="list-style-type: none"> • Ensure the ECC have the opportunity to continue to review and advise on the transport modelling and assessment process for the preferred site allocations and how this relates to the South Essex model and modelling for adjacent authorities. • Ensure ECC have the opportunity to be engaged and inform the proposed modal strategies for active modes (walking and cycling), public transport, and the highway network more generally (including freight). As well as the large strategic site high level transport strategies referenced within the Regulation 18 Transport Assessment. • Appreciate the spatial implications of growth for economic sites, future physical and social infrastructure and their implications on and for the transport network. <p>This list is not exhaustive and highlights the need for ongoing engagement with ECC as the Highway and Transportation Authority, to ensure that the transport evidence supporting the emerging Local Plan is robust, effective, deliverable and sound.</p>
ECCREP_110	S01 - Strategic Site Principles	<p><u>Strategic Site Principles – General Comments and Recommendations</u></p> <p>ECC welcomes that the draft Local Plan is proposing to have a policy that sets out the strategic site principles. However, ECC recommends that the principles be strengthened.</p> <p>To assist ECC highlight matters that should be considered to enhance existing wording, and also where their gaps and matters that must be considered to improve the effectiveness of the policy, and delivery of sustainable development.</p> <p>General comments on the principles –</p> <p>Firstly, ECC welcomes an appreciation of the strategic site defined threshold of 1,400+ homes. A justification for this threshold is recommended and to be supported by relevant evidence.</p> <p>Secondly ECC is mindful that the principles apply to sites “of 1,400+ homes” and recommend that cumulative growth within a locality must be considered and identify how cumulative impacts from growth proposals will be identified and mitigated, consistent with NPPF (2024).</p> <p>Thirdly ECC recommends that the principles should be developed, that are consistent with NPPF (2024) with particular attention drawn to paragraph 77, which sets out how strategic policy-making authorities should identify suitable locations for the supply of a large number of homes addressing how identified needs are addressed in a sustainable way. It sets out matters to consider. These matters should be consistent and reflected within the principles where appropriate.</p>

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		<p>Thirdly, ECC notes and welcomes that SO1 bullet a recommends the preparation of a masterplan for the strategic housing sites. This is consistent with NPPF (2024) paragraph 77. However, to strengthen the quality of places developed within Rochford. ECC recommends that for consistency with the NPPF (2024) and specifically paragraph 77, that the principles be amended to ensure they refer/incorporate relevant principles drawn from the Town and Country Planning Association <u>Garden City Principles</u>.</p> <p>set clear expectations for the quality of the places to be created and how this can be maintained (such as by following Garden City principles); and ensure that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-designed homes to meet the needs of different groups in the community;</p> <p>Fourthly, ECC notes that there is a current gap in the principles, as its lacks reference to the relationship between the allocation of future strategic scale housing, and employment. To ensure consistency with the NPPF (2024) paragraph 77 which recommends that larger housing sites should <i>“ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access”</i> (para 77).</p>
ECCREP_111	SO1 - Strategic Site Principles - Bullet b	<p><u>Existing/Planned Investment and Relationship with Strategic Sites</u></p> <p>ECC recommends that to ensure consistency with NPPF Paragraph 77 (bullet a), the principles for SO1 bullet b, be amended. The current focus of bullet b is on the infrastructure associated with the strategic site. ECC recommends that the proposed development proposals, must also consider the relationship to existing or planning infrastructure. As recommended within the NPPF (2024).</p>
ECCREP_112	SO1 - Strategic Site Principles – Bullet e	<p><u>Quality of Transportation Links</u></p> <p>ECC recommends that SO1 bullet e be strengthened to ensure there is reference to the quality of public and active travel transportation delivery within the strategic site allocations. This ensures consistency with the TCPA principles, in particular ECC recommend reference to the anticipated high frequency of public transport opportunities within these sites.</p>
ECCREP_113	SO1 - Strategic Site Principles Bullet f Page 278	<p><u>Education Facilities to Meet Future Need</u></p> <p>ECC consider that the term delivery is often misconstrued as developer led on site provision only, and using the term <i>‘education facilities’</i> is too narrow. To enhance the effective delivery of such facilities, ECC recommends that SO1 bullet f be amended to read –</p> <ul style="list-style-type: none"> • <i>“Through the provision of land, financial contributions and/or works: ensure sufficient appropriate education and childcare facilities for all age ranges and abilities, healthcare infrastructure including GP provision, and multi-purpose community spaces including facilities for youth services, creative industries, and play”.</i>

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ECC Representation Reference	Document Ref	Comments/Recommended Changes and Additions
ECCREP_114	<p>SO2 - General Site Principles and Site-Specific Policy Themes – Bullet 2d</p> <p>Page 279</p>	<p><u>Developer Contributions and Site Allocations</u></p> <p>ECC recommend for clarity and effectiveness that policy MG4, as opposed to individual site policies, must be used to secure financial contributions (not just education). However, ECC acknowledge that individual site policies must allocate specific areas of land for community, education and childcare uses et al.</p> <p>ECC also reiterate the need for reference to Child Care as well as Early Years.</p>
ECCREP_115	<p>SO1 - Strategic Site Principles</p> <p>SO2 - General Site Principles and Site-Specific Policy Themes</p>	<p><u>Strategic Sites and the Natural Environment</u></p> <p>ECC welcomes the requirement that development proposals must deliver an integrated network of open spaces, sport and recreation facilities, allotments, sustainable drainage, landscaping, and biodiversity measures.</p> <p>ECC also supports the commitment that all future allocated sites will provide clear expectations around landscaping, children’s play, amenity space, Biodiversity Net Gain delivery, and the protection and enhancement of key trees, hedgerows and habitats, alongside the provision of strategic spaces such as a country park where justified. To strengthen this further at the Regulation 19, ECC recommends that each site-specific policy additionally secures:</p> <ul style="list-style-type: none"> • delivery of a multifunctional and connected GI network, • habitat connectivity aligned with the Local Nature Recovery Strategy (LNRS), • provision of nature-based SuDS and habitat corridors, and • a GI-led master planning approach embedded from the outset. <p>ECC recommends the following amendments to the principles set out in SO1 –</p> <ul style="list-style-type: none"> • <i>Bullet c – “<u>deliver a multifunctional and connected Green and Blue Infrastructure (GBI) network, integrating open spaces, sport and recreation facilities, allotments, nature-based SuDS, landscaping and biodiversity measures, with clear links to wider landscape, habitat networks and LNRS priorities</u>”;</i> • <i>Bullet h – “<u>achieve Net Zero carbon in operation and incorporate resilient, nature-based flood management, sustainable drainage, and biodiversity net gain (minimum 10%); while encouraging opportunities to exceed 10% BNG where feasible and beneficial to ecosystem recovery</u>”.</i> <p>ECC recommends the following amendments SO2 Part 1 –</p> <ul style="list-style-type: none"> • <i>Bullet 1.e – “<u>avoid locations near protected habitats where impacts cannot be robustly mitigated, and ensure opportunities to enhance ecological networks and align with the LNRS are fully explored</u>”;</i> <p>ECC recommends the following amendments to SO2 Part 2 –</p>

ECC Representation Reference	Document Ref	Comments/Recommended Changes and Additions
		<ul style="list-style-type: none"> Bullet 2 b – <i>“detailed requirement for landscaping, children’s play, amenity spaces, BNG delivery, <u>integration of multifunctional Green and Blue Infrastructure, including and</u> protection/ enhancement of important trees, hedgerows and habitats; strategic spaces (e.g., a country park) where justified”</i>. <p>ECC also recommends a new clause 2f –</p> <ul style="list-style-type: none"> <i>Bullet 2 f – “expectations for Landscape-led approach, ensuring early and integrated consideration of habitat connectivity, protection and enhancement, including long-term management and stewardship arrangements”</i>.
ECCREP_116	Table 12 / Question 55: Page 290	<p><u>Education and Early Years and Child Care - Scenario Test</u></p> <p>ECC note that the draft Local Plan includes sites identified for further testing and seek to ensure that consideration is given to these sites and their cumulative impact. Attention is drawn to ECC Education and Early Years and Child Care Housing Scenario Test (dated August 2025) (resubmitted in Appendix 2 of the response).</p> <p>A revised scenario must be submitted to ECC for testing prior to publication of the submission draft. To assist Local Planning Authorities in the preparation of their Local Plans, ECC have produced Essex County Council Local and Neighbourhood Planners’ Guide to School Organisation and Place Planning. This guide explains how ECC can assist Local Planning Authorities in the preparation of Local Plans to ensure sufficient school places are provided to meet the need arising from new development over the Plan period.</p>
ECCREP_117	Table 12 Paragraph 12.2.3 – 12.2.4	<p><u>Minerals and Waste</u></p> <p>ECC, as the Mineral and Waste Planning Authority (MWPA) aims to ensure that site allocations identified within emerging Local Plans are consistent with the policy requirements set out within the Essex Mineral Local Plan (MLP) Policy S8 – Safeguarding mineral resources and mineral reserves, and the Essex and Southend-on-Sea Waste Local Plan (WLP) Policy 2 - Safeguarding Waste Management Sites and Infrastructure.</p> <p>Assessment allows the identification of any sites that may be located within a Mineral Safeguarding Area (MSA), Mineral Consultation Area (MCA) and/or Waste Consultation Area (WCA) and any further potential individual and collective impacts arising from allocations set out within the emerging draft Local Plan sites on mineral and waste matters.</p> <p>ECC notes that RDC have sought to review sites based on the methodology set out within the Site Assessment Methodology paper (SAM), that forms part of the evidence to support the draft Local Plan. As part of the draft Local Plan consultation, ECC have also used this as an opportunity to review some of the evidence base. ECC has provided comments on the SAM, where ECC have highlighted that there is no consideration for Mineral and Waste matters in the analysis and review of sites.</p>

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		<p>Attention is drawn to ECC’s MWPA’s response that was submitted to RDC in 2021. This response remains applicable and must be taken into consideration as part of the Site Assessment Methodology. Information on which sites fall within a Mineral Safeguarding Area, a Mineral Consultation area and/or a Waste Consultation Area must be taken into consideration as part of the Site Assessment Methodology. The MWPA have also provided a RAG Mineral and Waste Safeguarding Methodology. The information is supplied with the response and available in appendix 3 of the response.</p> <p>ECC recommend that SAM be reviewed and Minerals and Waste matters addressed, ECC welcomes engagement on the site assessment process to inform the preferred site allocations.</p>
	<p>Table 12 CFS260 Land North of Southend (LNOS)</p>	<p><u>Land North of Southend (LNOS) (Site Reference - CFS260)</u></p> <p>ECC consider the identification of land for development in the vicinity of Land North of Southend as a strategic cross boundary matter and engagement with RDC, SCC and ECC must be sought to explore the potential development under the Duty to Cooperate (or any other similar process).</p> <p>Attention is also drawn to ECC’s general comment on chapter 9 – where ECC have recommended RDC set out a strategic large scale site allocation policy. This site if allocated at the Regulation 19 stage of the Local Plan, would be defined as a strategic large-scale site and must comply with the provisions provided within the proposed policy.</p> <p>RDC and SCC are exploring large scale development and infrastructure on land north of Southend it would be necessary to consider cumulative growth proposed across both areas (and surrounds) and that the implications on and infrastructure and services requirements; with the needs defined and mitigated through a co-ordinated plan led approach. It is imperative that alignment across the respective local plan policy approaches, evidence and infrastructure and service requirements, to ensure the development is viable and deliverable.</p> <p>In seeking to consider the implications for development on this site, ECC recommends –</p> <ul style="list-style-type: none"> • a formal approach to partnership working be adopted through a three-way SoCG (with RDC, SCC and ECC) and a Memorandum of Understanding (MoU) to agree a co-ordinated plan led approach. • the delivery of a masterplan to support the allocation ensuring collaboration between RDC, SCC and ECC, developed with the Local Authorities rather than a “developer-led” master plan approach. • Engage ECC (and SCC) and other relevant bodies and infrastructure providers on the development proposals and proposed new infrastructure near or on the boundary with RDC. • Commission and ensure additional evidence for the development proposal is prepared in collaboration with SCC and ECC, as well as RDC. The evidence must establish any level of planned growth and identify mitigation and include necessary supporting infrastructure requirements, to ensure any development is viable, deliverable and phased. ECC also recommends that the evidence be consistent with relevant ECC guidance e.g. ECC Developers’ Guide (2025).

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		<ul style="list-style-type: none"> • Consistent with the provisions within ECC proposed large scale development sites policy (chapter 9 response) ECC expect any such proposals to be plan led, including a master plan/framework to clearly set the policy framework and infrastructure requirements, with reference to ECC’s response to the Guiding (TCPA Garden principles). • Establishing robust and sustainable stewardship structure early in the planning and delivery process for large scale strategic sites. • ECC also recommends that an appreciation of the Transport Assessment that will be utilised to inform the SCC and RDC emerging Local Plans must be reviewed and considered, to ensure the cumulative growth impacts are considered, identified and mitigated.
ECCREP_118	CFS222(a) Land West of Rayleigh (LWOR) Option A – Dollymans Farm	<p><u>Land West of Rayleigh (LWOR) Option A – Dollymans Farm (Site Reference - CFS222(a))</u></p> <p>ECC draws attention to general comment on chapter 9 where ECC have recommended RDC set out a strategic large scale site allocation policy. This site if allocated at the Regulation 19 stage of the Local Plan, would be defined as a strategic large-scale site and must comply with the provisions provided within the proposed policy.</p> <p>ECC are mindful that Basildon Council (BC) are currently in the process of reviewing their Local Plan, and it is necessary to consider cumulative growth proposed across both areas (and surrounds) and the implications on and infrastructure and services requirements; with the needs defined and mitigated through a co-ordinated plan led approach. It is imperative that alignment across the respective local plan policy approaches, evidence and infrastructure and service requirements, to ensure the development is viable and deliverable.</p> <p>In seeking to consider the implications for development on this site, ECC recommends –</p> <ul style="list-style-type: none"> • Consistent with the provisions within ECC proposed large scale development sites policy (chapter 9 response) ECC expect any such proposals to be plan led, including a master plan/framework to clearly set the policy framework and infrastructure requirements, with reference to ECC’s response to the Guiding (TCPA Garden principles). • the delivery of a masterplan to support the allocation ensuring collaboration with ECC and engagement with BC, developed with the Local Authorities rather than a “developer-led” master plan approach. • Engage ECC and other relevant bodies and infrastructure providers on the development proposals and proposed new infrastructure near or on the boundary with RDC. • Commission and ensure evidence for the development proposal is prepared. The evidence must establish any level of planned growth and identify mitigation and include necessary supporting infrastructure requirements, to ensure any development is viable, deliverable and phased. ECC also recommends that the evidence be consistent with relevant ECC guidance e.g. ECC Developers’ Guide (2025). • Establishing robust and sustainable stewardship structure early in the planning and delivery process for large scale strategic sites.

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		<ul style="list-style-type: none"> ECC also recommends that an appreciation of the Transport Assessment that will be utilised to inform the BC and RDC emerging Local Plans must be reviewed and considered, to ensure the cumulative growth impacts are considered, identified and mitigated.
ANNEX A – GLOSSARY of TERMS & ACRONYMS		
ECCREP_119	Glossary	<p><u>All Development Definition</u></p> <p>To enhance clarity ECC recommends that a definition within the glossary for 'all development' be included. This is to ensure that it is clear the Local Plan does not apply to the County Matters of Minerals and Waste development.</p>
ECCREP_120	Glossary	<p><u>Education Definition</u></p> <p>For clarity and consistent with ECC’s views on Policy MG4 from the draft Local Plan.</p> <p>Page 44 ECC recommends that a definition for “Education” be included within the glossary, the recommended wording is -</p> <ul style="list-style-type: none"> <i><u>‘Education - Early Years (including childcare); Schools & Academies (including SEND provision); post sixteen provision (including sixth forms plus further and adult education colleges); higher education provision and other institutions providing education and/or training’.</u></i>
ECCREP_121	Glossary	<p><u>Green Infrastructure Definition</u></p> <p>For clarity ECC recommends a definition for Green Infrastructure be included within the glossary, and the proposed wording is -</p> <ul style="list-style-type: none"> <u>A strategically planned and delivered network of green spaces and natural features which conserves wildlife, natural ecosystem values and functions, sustains clean water and air, and provides a wide array of benefits to people, economy and wildlife. This includes for example parks, open spaces, woodlands, trees, rivers, and allotments.</u>
ECCREP_122	Glossary	<p><u>Infrastructure Definition</u></p> <p>Consistent with the ECC comments on policies MG1 and MG4 of the draft Local Plan, ECC recommends that the glossary includes a definition for ‘infrastructure’ to enhance clarity.</p>