



Statement of Community Involvement

Land east of
Rayleigh Road,
Thundersley

This Land
Development
Limited

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EXECUTIVE SUMMARY

This Statement of Community Involvement (SCI) has been prepared in support of the application for outline planning permission *“for the development of up to 455 new homes, a multi-use community hall, land for the provision of a healthcare facility, land for a stand-alone early years and childcare nursery, new vehicular/pedestrian access points from Stadium Way in the north and Daws Heath Road in the south, new greenways and green links, multi-functional open space, green infrastructure, surface water attenuation, landscaping and associated infrastructure. All matters reserved except access.”*

The purpose of the SCI is to present the findings of the pre-application consultation, which has been undertaken to inform the evolving scheme before the submission of the application.

The public engagement strategy was strongly influenced by the covid-19 pandemic which limited the ability to conduct in person consultation events, as would have been This Land’s intention. Whilst the circumstances were challenging, This Land worked with CPBC to agree a public engagement strategy which would provide an opportunity for as many local residents and businesses as possible to review and influence the emerging proposals.

Considering the restrictions in place during the pandemic, This Land, in partnership with CODE Development Planners, considered how public consultation could be undertaken without breaking strict limits on groups of people meeting indoors and outdoors, and without endangering local residents and members of the project team. It was envisaged that engagement would be undertaken through a dedicated consultation webpage, which could be updated to reflect the latest stage of the planning application’s preparation, and residents invited to review the latest proposals and comment on specific questions which would help to inform the preparation of the masterplan.

The appropriate form and timescales for the consultation were subsequently agreed with members of CPBC’s Local Plan Delivery Board (LPDB) at a meeting on 11 November 2020.

Throughout the preparation of the planning application, This Land and its appointed consultant team had committed to supporting CPBC through the preparation and examination of the Castle Point Local Plan (2018-2033).

In light of policy HO13’s (Land east of Rayleigh Road, Hadleigh) requirement for the provision of land for early years childcare facilities, land for a new healthcare facility, and a multi use community building, This Land has also engaged with key stakeholders including the NHS to ensure new facilities meet with anticipated requirements.

Throughout the consultation process, the approach of the applicant and its consultant team has been to respond positively to consultation feedback from local residents and other consultees. Where practicable the proposals have been amended to address concerns or make provision for appropriate mitigation measures as part of the development proposals.

Throughout the preparation of the planning application, members of the planning application team have engaged with various statutory consultees to discuss their relevant disciplines in advance of submitting the proposals to CPBC for consideration. Statutory consultees contacted in advance of submission of the application have included:

- Anglian Water
- Lead Local Flood Authority
- Essex County Council Highways
- Essex Wildlife Trust
- Place Services Green Infrastructure Team
- NHS England

1 INTRODUCTION

- 1.1 This Statement of Community Involvement (SCI) has been prepared in support of the application for outline planning permission *“for the development of up to 455 new homes, a new multi-use community hall, land for the provision of a healthcare facility (1,000sqm), land for a stand-alone early years and childcare nursery (0.13ha), new vehicular/pedestrian access points from Stadium Way in the north and Daws Heath Road in the south, new greenways and green links, multi-functional open space, green infrastructure, surface water attenuation, landscaping and associated infrastructure. All matters reserved except access.”*
- 1.2 The purpose of the SCI is to present the findings of the pre-application consultation, which has been undertaken to inform the evolving scheme before the submission of the application.
- 1.3 The purpose of the pre-application consultation is to supplement, inform and, where possible, anticipate the statutory consultation process to ensure that the opinions of stakeholders are taken into account during the preparation of the planning application.

2 POLICY CONTEXT

- 2.1 The National Planning Policy Framework (NPPF), July 2021 outlines the importance of pre-application engagement.

Paragraph 39 states:

“Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.”

- 2.2 The NPPF encourages pre-application discussions with other relevant bodies to ascertain if a particular development is acceptable in principle and to resolve issues at pre-application stage.

Paragraph 40 states:

“Local planning authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage. They cannot require that a developer engages with them before submitting a planning application, but they should encourage take-up of any pre-application services they do offer. They should also, where they think this would be beneficial, encourage any applicants who are not already required to do so by law to engage with the local community before submitting their applications.”

- 2.3 The National Planning Practice Guidance (NPPG) states the following¹:

¹ Paragraph 001, reference ID: 20-001-20190315

2.4 *“Pre-application engagement by prospective applicants offers significant potential to improve both the efficiency and effectiveness of the planning application system and improve the quality of planning applications and their likelihood of success. This can be achieved by:*

- providing an understanding of the relevant planning policies and other material considerations associated with a proposed development*
- working collaboratively and openly with interested parties at an early stage to identify, understand and seek to resolve issues associated with a proposed development, including, where relevant, the need to deliver improvements in infrastructure and affordable housing*
- discussing the possible mitigation of the impact of a proposed development, including any planning conditions*
- identifying the information required to accompany a formal planning application, thus reducing the likelihood of delays at the validation stage. The information requested must be reasonable (more information can be found in Making an application).*
- putting in place a Planning Performance Agreement where this would help with managing the process and agreeing any dedicated resources for progressing the application*

2.5 *The approach to pre-application engagement needs to be tailored to the nature of the proposed development and the issues to be addressed.”*

2.6 The Castle Point Borough Council Statement of Community Involvement (SCI) was formally adopted on 18 November 2020 and sets out Castle Point Borough Council's (CPBC) approach to stakeholder engagement for planning applications within the districts.

2.7 The SCI provides information on CPBC's approach to engaging the wider community in the process of determining planning applications, particularly those involving major development proposals.

2.8 The SCI encourages community engagement when determining major development proposals. Paragraph 26 of CPBC's SCI states:

2.9 *“To ensure early public involvement on major development proposals or locally sensitive schemes the applicant will be encouraged to carry out public consultations before making a planning application. Before making a major planning application (10+ dwellings or 0.5+ ha of residential development or 1000+ square metres of building space or 1.0+ha of development land), prospective applicants should:*

- Talk to the Council planning officers about their application through making use of the Council's pre-application advice service;*
- Talk directly with relevant statutory consultees to minimise technical objections to their application. Some of the statutory consultees operate their own pre-application advice service;*
- Consult the local community on overall and specific aspects of the proposal. It is advised that the Council and local ward Members are notified of when such consultation is occurring;*
- Consider the consultation responses received and take them into account before making their planning application.”*

2.10 CPBC's SCI also states that *“Where applicable planning applications should be accompanied by a consultation statement explaining what consultation has been carried out by the applicant, including technical and public involvement and how it has influenced the planning application proposals. The*

Council will consider any submitted consultation statement by applicants in addition to any comments received on the planning application.”

3 APPROACH TO CONSULTATION

- 3.1 Prior to the preparation of the application an appropriate consultation objective and strategy was devised by This Land. This consultation strategy was prepared in draft and was subject to further amendment in advance of the commencement of public engagement. The public engagement strategy was strongly influenced by the covid-19 pandemic which limited the ability to conduct in person consultation events, as would have been This Land’s intention. Whilst the circumstances were challenging, This Land worked with CPBC to agree a public engagement strategy which would be
- 3.2 Considering the restrictions in place during the pandemic, This Land, in partnership with CODE Development Planners, considered how public consultation could be undertaken without breaking strict limits on groups of people meeting indoors and outdoors, and without endangering local residents and members of the project team. It was envisaged that engagement would be undertaken through a dedicated consultation webpage, which could be updated to reflect the latest stage of the planning application’s preparation, and residents invited to review the latest proposals and comment on specific questions which would help to inform the preparation of the masterplan.
- 3.3 The appropriate form and timescales for the consultation were subsequently agreed with members of CPBC’s Local Plan Delivery Board (LPDB) at a meeting on 11 November 2020. This Land initially agreed to undertake three separate rounds of public engagement prior to submitting the planning application. These were agreed to take the following forms:
1. Issues for consideration (including local matters/issues which the project team might not be aware of which could impact upon the masterplan);
 2. Masterplan options (a selection of potential masterplan options which could subsequently inform the site wide masterplan; and
 3. Consultation on the final masterplan (prior to finalising the masterplan ready for submission with the planning application).
- 3.4 This Land also committed to further meetings with the LPDB to ensure members had sufficient time to review and comment upon the emerging masterplan. Subsequent meetings took place on 15 April 2021 and 13 October 2021. Meetings with the LPDB would be in the form of a presentation from This Land’s application team regarding the emerging masterplan, followed by a discussion through which members would identify concerns regarding elements shown within the development, or comment favourably regarding other elements of the scheme. Further to the meetings, the application team would meet to discuss the comments and consider how the proposals could be tweaked to account for the comments made by the LPDB.

- 3.5 In addition, policy HO2 (Master Planning) of the now withdrawn Castle Point Local Plan (2018-2033) included further guidance and advice regarding the preparation of a site wide masterplan and engagement with key stakeholders:
- 3.6 Policy HO2 stated:
- 3.7 *“The Council will expect entering into voluntary planning performance agreements (PPA) with promoters of such development, to cover matters such as master planning, the pre-application process and a timetable for key events and the nature of engagement with the Council and the community.”*
- 3.8 Throughout the preparation of the planning application, This Land and its appointed consultant team had committed to supporting CPBC through the preparation and examination of the Castle Point Local Plan (2018-2033). The third and final stage of the public engagement strategy was between 7 and 14 November 2022, offering local residents and businesses one final opportunity to comment on the parameter plans accompanying the upcoming planning application submission.
- 3.9 In light of policy HO13's (Land east of Rayleigh Road, Hadleigh) requirement for the provision of land for early years childcare facilities, land for a new healthcare facility, and a multi use community building, This Land has also engaged with key stakeholders including the NHS to ensure new facilities meet with anticipated requirements.
- 3.10 Throughout the consultation process, the approach of the applicant and its consultant team has been to respond positively to consultation feedback from local residents and other consultees. Where practicable the proposals have been amended to address concerns or make provision for appropriate mitigation measures as part of the development proposals.
- 3.11 Throughout the preparation of the planning application, members of the planning application team have engaged with various statutory consultees to discuss their relevant disciplines in advance of submitting the proposals to CPBC for consideration. Statutory consultees contacted in advance of submission of the application have included:
- Anglian Water
 - Lead Local Flood Authority
 - Essex County Council Highways
 - Essex Wildlife Trust
 - Place Services Green Infrastructure Team
 - NHS England

4 RESULTS OF FIRST STAGE OF PUBLIC ENGAGEMENT

- 4.1 The results of the technical assessments and liaisons with statutory consultees are contained in the relevant technical reports accompanying the application. Comments made by the local community during the first stage of public engagement are summarised in this section of the report. In addition, changes that have been made to the proposed development as a result of these comments are outlined where relevant.
- 4.2 The first round of public engagement asked local residents living or working near to the site about what they consider to be the most relevant issues for the planning application team to assess and to take into account whilst planning for the form and scale of development proposed in previous policy HO13 (Land east of Rayleigh Road, Hadleigh) of the draft Castle Point Local Plan (2018-2033). The consultation included a questionnaire for ease of reference and assessment, but also allowed respondents an opportunity to email their comments separately (or by letter).
- 4.3 The questionnaire accompanying the first round of public engagement contained the following questions:
1. What do you consider to be the most important issues related to the development of the site for housing?
 2. Do you have any suggestions on how any noted issues might be resolved or provided for?
 3. In addition to the allocated new homes what uses do you believe should be provided on the site?
 4. Where on the site do you believe individual uses should be provided?
 5. What form of recreational open space would be most appropriate to provide on site?
 6. What form/type of housing do you think might be best provided on site?
 7. Any other comments?

- 4.3.1 The first stage of public engagement took place between 15 February and 15 March 2021. The outcome of this first stage of engagement is summarised below.

Principle of development on the site

- 4.3.2 Before considering specific responses received to each individual question asked through the initial round of public engagement, it is important to reflect upon the preparation, examination and subsequent withdrawal of the emerging Castle Point Local Plan (2018-2033) within the context of the overall public engagement strategy. Upon publication of the first stage of public engagement, the examination of the emerging Castle Point Local Plan 2018-2033 was ongoing, in the lead up to formal hearing sessions which took place between May and July 2021. As outlined on the dedicated consultation website, the principle of development in this location was a matter which had been

determined by CPBC in their selection of the site for allocation. Whether CPBC's decision was 'sound' was a matter for the inspector overseeing the local plan examination.

4.3.3 A number of comments received during the first stage of public engagement queried the principle of development for the site at Rayleigh Road, and the proposed release of the site from the Green Belt. At the time of the consultation, it was envisaged that the site would be released from the Green Belt upon the adoption of the local plan (subject to it being found sound). Since the closure of the examination (where the inspector concluded the local plan was sound subject to main modifications), CPBC has taken the decision to formally withdraw the emerging local plan.

4.3.4 In response to the queries received from local residents regarding the principle of development in this location, CODE would direct readers to the submitted Planning Statement which outlines the material considerations in favour of the scheme which are considered to cumulatively amount to Very Special Circumstances in favour of granting planning permission for the scheme in the Green Belt.

4.3.5 The Planning Statement also highlights the conclusions of CPBC's evidence base which was prepared in support of the emerging local plan, which concluded that "exceptional circumstances" existed in favour of releasing the site from the Green Belt, and the acute need for new market and affordable housing in the Borough over the period to 2033. It is important to note that just 169 new affordable homes have been constructed in the borough since 2011 (and only 18 affordable homes since 2018).

4.4 **Question 1 – What do you consider to be the most important issues related to the development of the site for housing?**

4.4.1 Respondents to this question provided a broad range of answers to this question regarding the issues they considered to be the most important to raise through the consultation. CODE has summarised responses under different topic headings below:

Highways

4.4.2 Many of the responses received focused upon potential impacts from the scheme on local highway infrastructure and existing traffic issues experienced at peak times. Responses concerning highways included:

Comments received	CODE response
A perceived lack of road infrastructure to support the development of the site for residential purposes.	The scheme has been prepared in consultation with Essex Highways, to ensure that the mitigation to be provided is in accordance with both the policies of the now withdrawn local plan, and the infrastructure requirements contained within the infrastructure delivery plan. The

Comments received	CODE response
	submitted Transport Statement details the proposed highway mitigation for the scheme
Existing congestion on the A129 (Rayleigh Road) and local junctions (including Victoria House Corner) and difficulties experienced during peak commuting hours.	<p>The scheme has been designed to encourage modal shift away from use of the private car for new residents. There will be a new network of green links and green ways across the site which will provide new and existing residents with direct links to new and existing community facilities. The scheme also proposes a new public transport link through the centre of the site, and will provide a financial contribution (subject to such a contribution meeting the relevant CIL 122 tests) towards the improvement of existing bus services. All new properties will be within 400m walking distance of existing and proposed bus stops.</p> <p>The proposals also include a Travel Plan which will demonstrate the importance of the environmental, health and commercial benefits of increasing the use of travel as an alternative to the private car. This Land is committed to developing this programme with the support of Essex County Council.</p>
Concern that new houses will increase the level of traffic using St Michael's Road (a B-classified road), which links to Bramble Road. Respondents were concerned that St. Michael's Road does not have a pavement and is a dangerous road to walk along for pedestrians	Appendix B of the submitted Transport Assessment outlines the likely trip distribution from the site at AM and PM peak times. The trip distribution rates demonstrate that the modelling conducted through the transport assessment considers it highly unlikely that there will be an increase in traffic using St Michael's Road.
Consideration should be given to public transport services, such as the formation of new bus routes. Respondents queried how new	As outlined above, the proposals include a new public transport link through the centre of the site, providing direct access to the new village

Comments received	CODE response
residents on the site would travel to local railway stations (particularly as a number of respondents noted that many people in Thundersley commute into London).	green and community hub. Bus services will provide services to existing railway stations, and proposed new walking and cycling routes will connect into existing infrastructure to enable people to access rail facilities via sustainable transport options.
Responses included a desire to see a new “station-hopper” service, which would provide direct access to railway stations (responses noted that station hopper style services had been incorporated into other new housing developments elsewhere).	The applicant will consider this request in consultation with Essex County Council.
Concerns were raised regarding the potential impacts on the local highway network during the construction of the scheme, including from construction traffic and the potential for added congestion on key junctions.	Should the scheme receive a grant of outline planning permission, the applicant will provide a detailed construction management plan to minimise the potential impacts of the construction phase on nearby residential properties. In addition, the submitted noise, air quality and vibration statements demonstrate that any potential impacts on neighbouring amenity through the construction phase can be appropriately mitigated.
A suggestion that, to avoid traffic leaving the site directly onto Rayleigh Road, new exit roads be provided directly to Daws Heath and onto the A127.	The applicant does not have control over wider land holdings to consider direct access onto the A127 or directly into Daws Heath. With regard to a link into Daws Heath, even if land ownership were achievable, a new route would be required through the Little Haven Nature Reserve, which would not be possible.

4.5 Infrastructure

4.5.1 The following responses were received from local residents regarding infrastructure:

Comments received	CODE response
A development in excess of 400 new residential homes and average family size (four people) could mean the addition of 1,600 new people living within the area, creating further strain upon education and health facilities.	The applicant is committed to working with the local education and healthcare authorities to ensure sufficient capacity can be created to accommodate new residents from the development of the site. The site includes land for a new early years childcare facility and new healthcare facility, both of which will be included within the Section 106.
The local doctor's surgery is closed to new patients and replacement of doctors (who leave the practice) is slow.	The scheme proposes land for a new healthcare facility. The need for such a facility was established through the evidence base for the now withdrawn local plan
Concerns raised regarding the capacity of the electrical network.	The scheme is accompanied by a utilities statement. Local facilities will be upgraded by statutory providers to accommodate the scheme.
Any housing provided should be of sufficient quality and have access to the right level of amenities/infrastructure to support/accommodate the potential influx of new residents into the area.	The proposals have included various amenities within the site boundary, including new community facilities and recreational open space. The multi-functional open space led approach to the scheme ensures there is sufficient space within the scheme to discourage recreational disturbance outside the site boundary.
More people equates to more crime, waste, pollution demand on local amenities, which will also increase pressure upon police, fire rescue and ambulance services in the borough.	The scheme has been designed in accordance with national and local design policies and guidance to help to minimise crime.
Concern regarding potential impacts on surface water drainage locally and water supply.	The submitted Flood Risk Assessment and Drainage Strategy demonstrate the site is

Localised flooding highlighted in the Daws Heath/Rayleigh Road area.	located within Flood Zone 1 and is not at risk of flooding from rivers or the sea. Whilst there is some existing localised surface water flood risk to the north east and south east of the site, the detailed surface water drainage strategy outlined within the submitted planning application will ensure betterment for surface water run off than existing levels, thereby reducing potential surface water effects on surrounding roads and properties.
A new doctor's surgery should be provided on the site.	Land for a new healthcare facility is included within the site boundary.

4.6 Question 2 – Do you have any suggestions on how any noted issues might be resolved or provided for?

4.6.1 The following responses were received to question 2 (note – where similar responses were made to comments received under question 1, these are addressed in the previous table):

Comments received	CODE response
Make the A127 wider and enhance traffic flow at Rayleigh Weir (including yellow box cameras)	Widening the A127 does not form part of the proposals and would not be reasonably related in scale and kind to the development.
Provide priority for cyclist and pedestrians to discourage private car use.	The scheme encourages and promotes sustainable transport modes across the site, emphasising the benefit to residents of using new greenways and green links which provide safe, traffic free routes to new and existing services. New public transport provision through the centre of the site also ensures all future residents will be within a 400m walking distance of existing or proposed bus stops.
Bus routes must be improved.	A financial contribution towards the improvement of existing bus services, to be rerouted through the development, will be negotiated with Essex County Council.

Solar panels should be included on all new homes and new homes should have electric car charging points	The statement submitted with the application by Energist UK demonstrates a commitment to all new homes being fitted with solar panels. There will be an installation of 0.78kWp Photovoltaic array to each residential property
Build less homes and do not build flats.	The housing mix to be provided on site will be finalised at the reserved matters stage and will broadly reflect CPBC's housing mix (most up to date evidence). Flats are a key component in CPBC's anticipated mix.
Encourage new Tree Preservation Orders for new planting on site boundaries	Protection of new boundary planting will be discussed at the reserved matters stage.
Leave the field nearest Daws Heath Road free of development for wildlife.	The scheme achieves a 10% gain in biodiversity across the site, in part due to the multi-functional open space strategy which ensures 50% of the site remains undeveloped.
Ensure development respects existing residential properties adjacent to the site boundary and ensure appropriate buffers provided.	The amenity of existing residential properties has been carefully considered in the preparation of the illustrative plans and suitable buffers will be provided between proposed and existing properties to ensure there is no overlooking of private amenity spaces.

4.7 Question 3 – In addition to the allocated new homes, what uses do you believe should be provided on the site?

4.7.1 The following responses were received to question 3 (in similarity with previous questions, further responses were received objecting to the principle of development. Comments have been addressed in this SCI and the submitted planning statement provides the applicant's considered planning case regarding the principle of development in this location):

Comments received	CODE response
New school should be provided	As addressed elsewhere in this SCI, offsite financial contributions will be made by the applicant towards the expansion of existing

	primary and secondary school facilities where contributions are in accordance with the relevant CIL 122 tests.
New healthcare facility	Land for a new healthcare facility is included as part of the planning application. The full extent of new services available within the health facility will be determined by the NHS.
Community facility/centre providing activities for young people	A new, multi-use community building is included within the proposals. The building will be large enough to accommodate two new badminton courts and provide spaces for community groups.
New retail units should be provided.	Policy HO13 of the now withdrawn local plan did not seek the provision of new retail units. The planning application has been prepared in compliance with this policy. The requirements within the withdrawn policies of the local plan were informed by CPBC's evidence base, which required local shops and other new facilities across other former allocation sites.
Provide new parkland to help provide healthy environment for new residents.	New parkland is provided within the illustrative masterplan in addition to a significant proportion of new multi-functional open space across the extent of the site (50% of the site is devoted to new open spaces and new habitats).
Trim trails should be incorporated into the scheme to encourage healthy lifestyles.	Trim trails have been incorporated into the proposed illustrative masterplan and will be carried through to the reserved matters proposals.
Provide a network of footpaths, including new routes around the fishing lake.	As outlined within this statement and on the illustrative masterplan, a new network of greenways and green links is proposed across the scheme to encourage modal shift away from

	use of the private car and facilitate migration routes for wildlife.
A new local health centre for minor operations.	Land for a new healthcare facility is included as part of the planning application. The full extent of new services available within the health facility will be determined by the NHS.

4.8 **Question 4 – Where on the site do you believe individual uses should be provided?**

- 4.8.1 A significant majority of respondents to this question stated that the purpose of this question was misunderstood. Other comments received also stated that decisions should be taken by planners and not by members of the public.
- 4.8.2 Some commentary on the location of specific uses was provided. Comments received indicated a preference for new housing to be located closer to the commercial land uses to the north east of the site, in addition to ensuring that the new community facilities are provided close to new areas of open space. Other comments received expressed concern regarding potential landscape impacts from the proposed community facilities and a desire to see these located in close proximity to the commercial units adjacent to the north of the site.

4.9 **Question 5 – What form of recreational open space would be most appropriate to provide on site?**

- 4.9.1 In similarity with a number of the previous questions, a significant number of responses stated a preference for 'no housing' on the site and for the land to be left open. The principle of development is addressed earlier in this SCI and within the submitted Planning Statement.
- 4.9.2 The responses to this question expressed a desire for new green spaces, new play spaces and retention of the fishing lake. Other responses expressed a desire for an active landscape which encourages physical activity around the scheme.
- 4.9.3 The submitted scheme and the illustrative masterplan demonstrate a commitment to a multi-functional open space led approach, with 50% of the site being left for open spaces. The new open spaces will serve different purposes, whilst also encouraging active travel and biodiversity net gain.
- 4.9.4 The fishing lake is to be retained as part of the development and managed accordingly, opening up this part of the site to a wider percentage of the local population than at present (due to existing membership requirements). Fishing in the lake will be retained and encouraged as a key community activity.

4.10 Question 6 – What form/type of housing do you think might best be provided on site?

4.10.1 In similarity with a number of the previous questions, a significant number of responses stated a preference for 'no housing' on the site. The principle of development is addressed earlier in this SCI and within the submitted Planning Statement.

4.10.2 Other responses received expressed a strong desire for new family housing to form part of the new proposals, the provision of new affordable housing and housing which would be suitable for elderly people, including bungalows. The housing mix for the scheme is yet to be finalised, as the planning application is made in outline, however, the developer of the scheme subject to outline planning approval and reserved matters approval will be expected to provide new housing in accordance with CPBC's most up to date housing mix.

4.10.3 With regard to affordable housing, the Council's now withdrawn policy HO4 stated that the council would seek *"no less than 50% of all new affordable housing to be affordable housing for rent, with the remainder affordable home ownership products, as defined in the NPPF."* The applicant intends to be broadly in accordance with the requirements in the council's now withdrawn policy, with a provision of First Homes in accordance with National Planning Policy as part of the total affordable housing contribution.

4.11 Question 7 – any other comments?

4.11.1 The majority of the responses received to question 7 took a final opportunity to again question the principle of development in this location. These matters are addressed in the submitted Planning Statement.

5 RESULTS OF SECOND STAGE OF PUBLIC ENGAGEMENT

- 5.1 The second stage of the public engagement strategy focussed upon four separate options for the location of the proposed new community facilities within the emerging masterplan. The nature of the particular constraints and opportunities which exist on site, including topography, habitats and proposed drainage basins means that there are very limited opportunities for built development outside of the locations shown on the submitted plans.
- 5.2 The plans uploaded to the consultation webpage are included at appendix 1 of this SCI.
- 5.3 The second stage of the public engagement strategy invited residents to respond to the following questions (in similarity with the first stage of public engagement), and also maintained the option for respondents to comment by email only (not having to respond directly to the consultation questions):
- Which of the four options is your preferred location for the proposed community facilities?
 - Do you have any comments on the design principles underpinning the masterplan?
 - Would you prefer to see the proposed community facilities located around the village green on the site masterplan? If not, where do you consider these uses should be provided on site?
 - The latest masterplan shows a range of recreational open space to be provided on site. Do you have any suggestions on these proposed open spaces?
 - Do you consider the proposed greenways and green links across the site will encourage walking, cycling and equestrian use through the site?
 - Any other comments?
- 5.4 226 responses were received to the second stage of public engagement with local residents. Whilst many respondents did use the questionnaire to respond to the consultation, it should be noted that many responses again commented upon the principle of development in this location, which at the time was established through the emerging local plan. CODE's response to the principle of development in this location (and the very special circumstances which exist to justify development in the Green Belt) is addressed within the submitted planning statement.
- 5.5 A significant proportion of responses also simply commented that the proposals are not wanted or are not supported. CODE recognise that the proposals are not supported by all members of the community. In preparing the application, the majority of work undertaken has been focussed upon meeting the requirements of the now withdrawn local plan allocation. Further to the local plan's withdrawal, CODE recognise that residents who were previously unsupportive whilst the site was included as a draft allocation will still likely not be in favour of the proposals. As outlined within the planning statement, the site provides a key contribution to acute market and affordable housing needs within the borough, and was recognised as a sound allocation by the local plan inspector.

- 5.6 The site also continues to play a key role in the delivery of crucial infrastructure for the local community, identified within many consultation responses as being an essential part of the development of the site. For these reasons, This Land continue to promote the site for development, recognising the key role the site can play in the delivery of new affordable housing in an authority where just 169 affordable properties have been delivered over a 10-year period.
- 5.7 The following table summarises the responses received to the second stage of public engagement, with CODE's considered responses:

Consultation comment	CODE response
Further concerns expressed regarding potential congestion arising out of the new development on nearby roads.	As highlighted within CODE's response to the highway concerns expressed during the first stage of public engagement, This Land has worked closely with Essex County Highways to establish a suitable highway mitigation strategy for the scheme. The scheme is designed to encourage local trips to be undertaken on foot, by bike or by public transport and dissuade the use of the private car. This modal shift strategy has been agreed with Essex County Council in advance of submitting the planning application.
Further concerns expressed regarding the capacity of local infrastructure, including schools, nurseries, healthcare facilities and community buildings.	<p>As outlined within CODE's responses in the first stage of public engagement, the site is to include a new multi-use community building for the use of existing and future residents.</p> <p>Furthermore, land for a new early years childcare facility, in addition to land for a new healthcare facility are also included within the description of development. This Land is committed to providing serviced parcels of land for these facilities to be transferred to the relevant authorities through the section 106.</p> <p>This Land will also make contributions towards the expansion of offsite infrastructure, where requests comply with the relevant CIL 122 tests, to ensure that any additional pressure the</p>

Consultation comment	CODE response
	development may place upon existing services and facilities is appropriately mitigated.
Concern expressed regarding potential impacts on biodiversity across the site.	Refer to biodiversity net gain report once completed.
Suggestion that the site should not be developed but should be planted with trees across the site's entirety. Other responses emphasised a desire to see strong levels of tree planting within the final proposals.	Whilst CODE and This Land respectfully disagree that the entire site should be planted with trees, the illustrative drawings demonstrate This Land's commitment to the retention of the majority of trees and hedgerows across the site, and a desire to ensure new streets are tree lined in accordance with national planning policy. A new community orchard is proposed within the site boundary, in addition to significant additional planting across the site within the extensive public open spaces to be created within the development. These measures were further enhanced in light of the strong representations made through the consultation.
Some concern expressed regarding potential impact on air quality in the local area and whether emissions will exceed recommended levels from the World Health Organisation (WHO)	<p>The submitted Air Quality Assessment has assessed the potential air quality impacts arising from the development of the site. The construction works have the potential to create dust. During construction it is recommended that in accordance with the IAQM guidance a package of mitigation measures is put in place to minimise the risk of elevated PM10 concentrations and dust nuisance in the surrounding area. With mitigation in place the construction impacts are judged as not significant.</p> <p>The operational effects of the Proposed Development on human receptor locations are judged to be not significant.</p>

Consultation comment	CODE response
	<p>Mitigation measures to reduce the impacts of the development on air quality concentrations are not considered to be required, however additional transport related mitigation measures will be employed through a Travel Plan to reduce emissions from the Development.</p> <p>The Proposed Development is therefore considered to be in accordance with the requirements of the NPPF, and relevant local and national planning policy and guidance regarding air quality.</p>
<p>Further concerns raised regarding the potential for flooding on site and in the site's locality. Other comments received stated that the site is within a floodplain.</p>	<p>The submitted Flood Risk Assessment, prepared by Stantec, concludes that:</p> <ul style="list-style-type: none"> • The site is located in Flood Zone 1: Low Probability of flooding; • There is surface water flood risk in the north-eastern and south-eastern areas of the site which coincide with areas of low topography and existing drainage features and hence considered to be at low risk of flooding; • There is a low to medium groundwater flood risk across the site; <p>The site is considered to be at low risk from other forms of flooding</p>
<p>Concern expressed regarding the permissive footpath shown on the consultation literature, which is not a permissive footpath.</p>	<p>The permissive footpath the subject of the response is located on Daws Heath Road to the east of the application site (it is not within the site's red line boundary). The lane adjacent to the respondent's property includes a kissing gate which provides access into the nature reserve adjacent to the scheme. The lane is not shown as a permissive footpath on the Essex Wildlife</p>

Consultation comment	CODE response
	<p>Trust's local mapping but is known to be used widely in the local area for access into the nature reserve. The application team note the discrepancy with the Wildlife Trust's mapping. The plan displayed on the consultation website will not be submitted with the planning application (its purpose was to show identified site features for the consultation website) and the footpath is also outside of the application boundary, and does not form part of the application proposals.</p>
<p>Queries regarding the effectiveness of the proposed greenways and green links across the site and whether these will assist in dissuading people from using their private vehicles.</p>	<p>The scheme has been designed to encourage new residents (and existing residents in the local area) to use a new network of off-road footpaths, greenways and green links to access existing and planned facilities safely, away from main roads. The applicant is also working with Essex County Council to discuss appropriate contributions towards new cycling infrastructure for Rayleigh Road, which will increase the safety for cyclists along this main route through the borough.</p>
<p>Many responses suggested that there is sufficient brownfield land across the borough to meet identified market and affordable housing needs.</p>	<p>The inspector's report into the soundness of the now withdrawn Local Plan (2018-2033) considered the available supply of housing land within the borough and whether it would be possible to provide for the full, identified housing needs on brownfield land only.</p> <p>The inspector concluded, at paragraph 42 of their report, that <i>"The Council has undertaken a thorough assessment of the availability of land within the urban area through its SHLAA [Strategic Housing Land Availability Assessment] 2018 and the assessment of windfall sites. A total of 477 sites were</i></p>

Consultation comment	CODE response
	<p><i>considered and a design led approach was taken to determine their potential capacity, with higher densities assumed as appropriate, along with assessments of deliverability / developability as per national policy, and the assessment of viability. Additionally, through the large site capacity assessments, the Council sought to optimise the capacity of proposed sites, including those in the urban areas. This work indicates that around 53% of the housing need could be met within the urban area (that is to say outside of the Green Belt). Therefore, it is not possible to rely on increasing the supply of housing within the urban area to avoid the need to alter the boundaries of the Green Belt to meet housing need."</i></p> <p>It is clear from the inspector's consideration of the council's supply of housing land that insufficient capacity exists within urban areas to meet the full identified needs for market and affordable housing.</p>
<p>Concern that there is only one vehicular access point into the development. Other responses raised concerns that two access points are not sufficient for the scheme.</p>	<p>The proposals include two new vehicular access points into the scheme, from Stadium Way in the north and from Daws Heath Road in the south, in accordance with the requirements of now withdrawn policy HO13 of the local plan (2018-2033). In further accordance with policy HO13, and reflecting the wish of elected members, there is no direct link between the two access points for private cars within the site. The link in the centre of the site is for public transport vehicles, taxis, pedestrians and cyclists only.</p>
<p>Suggestion that new GP facility should accompany the new proposals.</p>	<p>The proposals incorporate land for a new healthcare facility which was required under Policy HO13. Whilst the local plan has now been</p>

Consultation comment	CODE response
	<p>withdrawn, the proposals still include the proposed land for a healthcare facility. The applicant held discussions with the NHS in March 2021 to ensure that the proposals for the land, its location on the site and space requirements have been met to ensure it meets with the NHS' specifications.</p> <p>A second meeting was held on 11 August 2022, at which the latest updates on the proposals were provided to the NHS. The discussion focussed on the provision made within the illustrative drawings accompanying the proposals to ensure that these would continue to meet the NHS' specifications. In addition, the NHS advised on their internal review process which is continuing to identify the most appropriate site for a new health centre in Castle Point. It was agreed at the most recent meeting to continue engaging with each other to work towards the NHS reaching a conclusion on its preferred location for a new health centre in the borough.</p> <p>Engagement with the NHS will therefore continue throughout the determination of the planning application to ensure the land to be provided meets their requirements.</p>
Two responses suggested preferences for options displayed – options 1 and 4.	Expressions of preference for the identified options were noted and welcomed by the application team.
Other responses suggested that there should be a new primary school located within the site boundary.	CODE notes the responses made regarding the potential pressures upon existing primary school facilities in the area from the new development. The applicant will work with the relevant education authority to establish appropriate financial contributions towards the expansion of

Consultation comment	CODE response
	existing facilities to accommodate the pupils yielded by this development.
A suggestion that the population has only grown by 3% in 10 years, and therefore there is no identified need for new housing in the borough.	Whilst it is noted that population growth may have been slow over the previous 10-year period in Castle Point, it should be acknowledged that the slow population growth has been in the context of just 1,193 dwellings delivered over the same period, against a requirement for 3,199 homes (calculated using appropriate requirements used dependent upon methodology in place at the time). The housing delivered represents just 37% of the housing which should have been delivered over the same period, severely constraining the ability for the population to grow sustainably in the borough.
One response queried whether there will be provision of any over 50s/sheltered accommodation within the proposals.	There are no specific plans to include over 50s/sheltered accommodation within the development, however, a proportion of homes on site will be specifically aimed at older people through the provision of homes which meet Part M4(2) of the Building Regulations.
Concern that new residents will not wish to walk/cycle in the new development as main roads in the local area are too dangerous.	The scheme has been designed to encourage new residents (and existing residents in the local area) to use a new network of off road footpaths, greenways and green links to access existing and planned facilities safely, away from main roads. The applicant is also working with Essex County Council to discuss appropriate contributions towards new cycling infrastructure for Rayleigh Road, which will increase the safety for cyclists along this main route through the borough.
Question whether there will be any sustainable energy production within the site boundary.	Whilst the application is made in outline, the submitted Energy Statement prepared by

Consultation comment	CODE response
	<p>Energist UK confirms the following sustainable measures will be built into the scheme:</p> <ul style="list-style-type: none"> • Energy efficient building fabric and insulation to all heat loss floors, walls and roofs. • High-efficiency double-glazed windows throughout. • Quality of build will be confirmed by achieving good air-tightness results throughout. • Efficient-building services including high-efficiency heating systems. • Low-energy lighting throughout the building. • Installation of 0.78kWp Photovoltaic array to each residential property; and • Air source heat pumps throughout the development. <p>The report therefore concludes that the combination of demand-reduction measures, energy-efficiency measures and low-carbon and renewable energy will deliver the Applicant's target for on-site reduction in CO2 emissions.</p>
<p>One response queried whether endangered newts had been found on site and whether appropriate mitigation has been identified.</p>	<p>The applicant has commissioned a full ecological impact assessment which has been submitted with the planning application. The assessment has confirmed that surveys and DNA tests for onsite and offsite ponds indicated that Great Crested newts were not found within the site boundary, and concluded they are <i>"likely absent from the site."</i></p>

Consultation comment	CODE response
One response queried the safety of the proposed access in relation to an existing equestrian business located to the south of Daws Heath Road.	The submitted Transport Statement has confirmed that the proposed new access onto Daws Heath Road interacts safely with the existing highway network. A road safety audit be undertaken to ensure the new junction can interact safely with equestrian users.
Queries regarding the tenures of affordable housing to be built within the scheme and whether 40% of homes will be affordable, in accordance with now withdrawn policy HO4.	The Council's now withdrawn policy HO4 stated that the council would seek <i>"no less than 50% of all new affordable housing to be affordable housing for rent, with the remainder affordable home ownership products, as defined in the NPPF."</i> The applicant intends to be broadly in accordance with the requirements in the council's now withdrawn policy, with a provision of First Homes in accordance with National Planning Policy as part of the total affordable housing contribution.
An emphasis within many responses for sufficient facilities for young people of all ages.	Further to the responses received, the applicant has considered the proposals for new play facilities within the scheme. The proposals now include equipped children's play areas and natural play spaces across the development site, providing sufficient new facilities to meet demand across the proposals.

6 PRE-APPLICATION PRESENTATION TO MEMBERS

- 6.1 On 17 October 2022, members of This Land's planning application team made a presentation to elected members of CPBC regarding the planning application. The presentation provided an update to members in relation to the work undertaken in the preparation of the planning application and the updated illustrative planning application drawings (which had been reviewed and updated to reflect previous stages of public engagement). Further to the presentation, there was an opportunity for members present to ask questions regarding the proposals. Members did not provide a view on the proposals. The presentation was simply an opportunity for This Land's team to update members, and for members to ask questions to increase their understanding of the scheme.

7 RESULTS OF THE THIRD AND FINAL STAGE OF ENGAGEMENT

- 7.1 Further to the meeting with members on 17 October 2022, it was agreed to provide an additional opportunity for local residents and businesses to comment upon the draft planning application documents, particularly those residents located closest to the application site boundary.
- 7.2 The final stage of engagement provided an opportunity to comment between 7 and 14 November 2022. The third stage of engagement focussed upon two plans. These were a Multi-functional open space drawing and one of the parameter plans which has been submitted with the planning application.
- 7.3 The plans uploaded to the consultation webpage are included at appendix 2 of this SCI.
- 7.4 68 responses were received to the second stage of public engagement with local residents. The majority of comments received objected to the principle of development in this location, with particular reference to the capacity of existing infrastructure to accommodate residents arising out of the development in the event planning permission is granted.
- 7.5 Included within the 68 responses were comments from Castle Point's MP. The majority of issues raised included objection to the principle of development in the Green Belt and further comments regarding the potential highways impact arising out of the scheme. In addition, comments were made in relation to the surface water drainage strategy for the application scheme, as follows:

"This September, several months after the last draft local plan was evaluated by the Planning Inspector, a report under Section 19 of the Flood Water Management Act 2010 has been released by Essex County Council as the Lead Local Flood Authority, into the flooding that occurred across the Borough on the 21st September 2021. One of the many recommendations in the report was that two key documents that form the basis of the evidence used by council planning officers regarding flood risk in Castle Point, the Local Flood Risk Management Strategy and Surface Water Management Plan (including existing hydraulic modelling) be reviewed and updated, with a particular focus on increasing risk due to climate change. Essex County Council made a public commitment at its Full Council meeting on 11th October 2022 that this recommendation will be followed and work will begin

imminently. This proposal is premature and time should be given for Castle Point Borough Council to update their planning policies to take the report and any subsequent work into account. Not only does the Section 19 report show that the flood risk evidence used by planning officers in the last draft local plan is in desperate need of revision, but the concerns it raises about the existing drainage network mean it is unlikely you will be able to accurately determine the level of investment necessary for your proposed 'Sustainable Urban Drainage Scheme' to ensure it will not cause unacceptable strain on existing surface water management systems in Castle Point and exacerbate flood risk for existing properties. Indeed, I also doubt whether you will be able to accurately determine whether such a scheme is even possible given the inadequacy of the wider drainage network."

- 7.6 CODE has liaised with This Land's instructed flood risk and drainage consultants who have responded to this particular point as follows:

"For the production of the Flood Risk Assessment (FRA) and Drainage Strategy for the site, Essex County Council (ECC), as the approving Lead Local Flood Authority, the Environment Agency, Castlepoint Borough Council and Anglian Water Ltd (AW) were all consulted. The proposed drainage has been designed to ensure existing discharge rates are not exceeded and Sustainable Drainage Systems (SuDS) have been fully incorporated throughout the development site. The surface water is proposed to either discharge, as per the existing situation, into the existing watercourse or surface water sewers, influenced by the topography of the site. The outfall locations and rates have been fully agreed with ECC and AW during the pre-planning process, who are the approving authorities on such matters. The design has been based on these statutory consultees latest requirements, with climate change projections also accommodated."

8 CONCLUSIONS

- 8.1 The consultation objectives and strategy were achieved and the proposals have evolved as a consequence. This approach accords with the recommendations of engagement policies and CPBC's Statement of Community Involvement.
- 8.2 Consultation was undertaken with:
- Anglian Water
 - Lead Local Flood Authority
 - Essex County Council Highways
 - Essex Wildlife Trust
 - Place Services Green Infrastructure Team
 - NHS England
- 8.3 Local knowledge from consultation responses and the individual discussions with stakeholders has enabled the applicant to consider elements of the proposal with a greater understanding. Comments

received during the local community consultation show that members of the public are primarily concerned about the proposed number of dwellings on site, and the development of land within the Green Belt. The planning application demonstrates how each of these concerns have been considered and where appropriate mitigated. The planning application submission also identifies the development plan and material considerations that should be taken into account when determining the planning application. The applicant considers that the issues raised during the public consultations exercise do not outweigh development plan policies and material considerations for positively determining the planning application.

- 8.4 The applicant found the consultation process extremely helpful and informative. A number of alterations and clarifications have been made to the proposal prior to submission as consequence of the feedback received.
- 8.5 The applicant anticipates that once the proposals are formally submitted to CPBC further comments are likely be received directly by the local planning authority.



Appendix 1

Design Principles

Edges



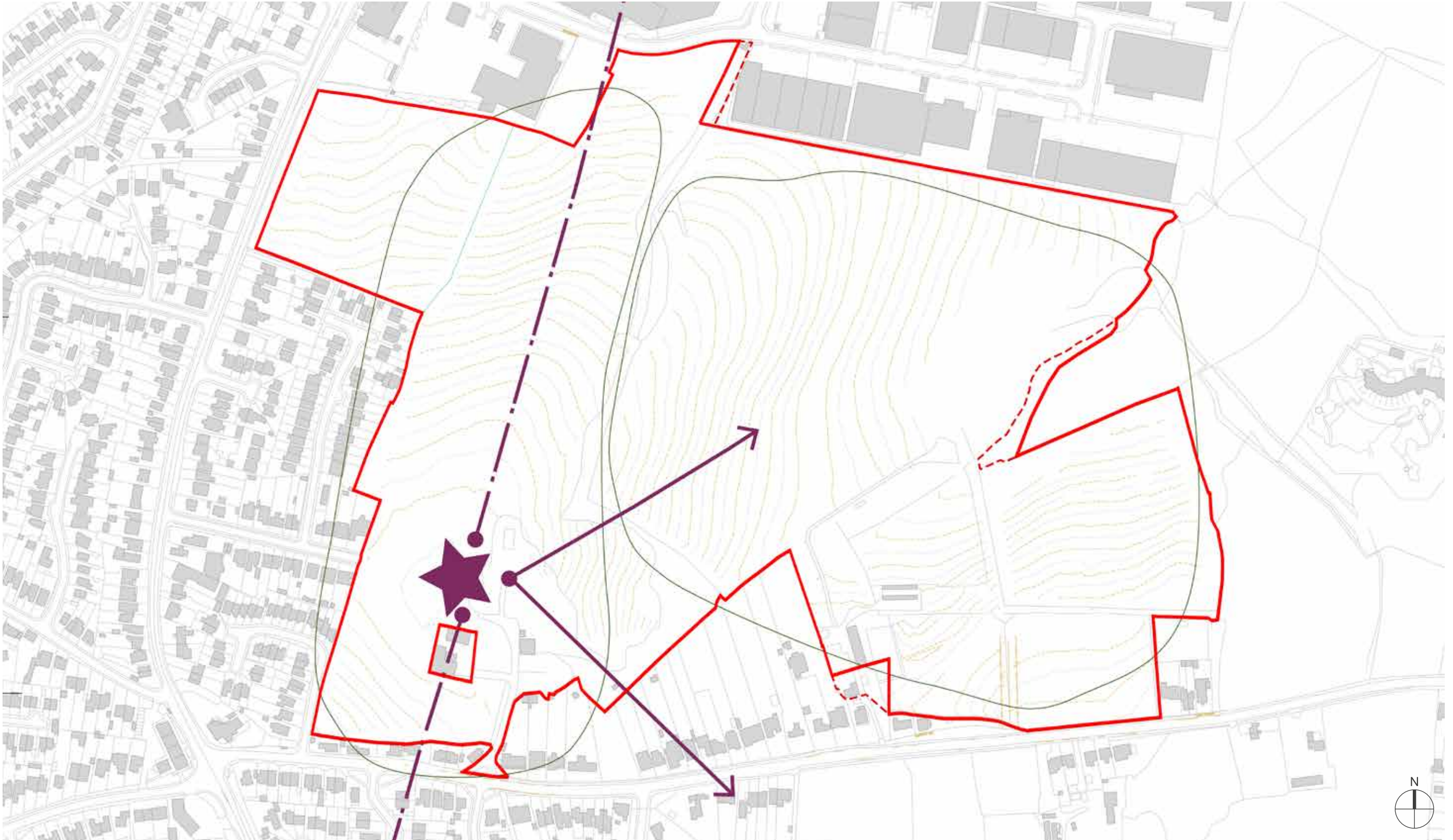
Design Principles

Historic and Natural Landscape



Design Principles

Landform and Views



Design Principles

Setting and Character



Design Principles

Connectivity



Design Principles

Multi functional open space





















Masterplan Options

All options locate the new healthcare centre, community hall and nursery along main street link, which is critical for accessibility.

KEY

Extent of site		Multi functional open space		Housing	
Main street		Key space		Key frontage	
Bus only link		Village green		Potential healthcare facility	
Pedestrian route		Blue corridor		Potential community / sports hall location	
Existing tree		Lake		Potential early years location	
New tree					



Option 1

- All non residential facilities are clustered around the village green, providing a mixed use hub.
- Buildings provide enclosure and activity onto the village green.
- Facilities are centrally located and easily accessible for new and existing residents.



Option 2

- All non residential facilities are located at a gateway location, marking the entrance to the new neighbourhood.
- Facilities are located close to the retail park and the bulk of existing housing, creating a critical mass.

Masterplan Options



Option 3

- Healthcare centre provides a gateway marker building, with the community centre and nursery overlooking the village green.
- Allows for new housing to be interspersed with the non residential uses.



Option 4

- Healthcare centre and nursery overlook the village green, providing activity and enclosure around key central space. Community/sports hall front onto the lowland meadow green corridor.
- Allows for new housing to be interspersed with the non residential uses.
- Facilities are centrally located and easily accessible for new and existing residents.



Appendix 2



KEY

- Application site area
- Developable area
- Multi functional open space
- Existing water body retained
- Medical centre (indicative location)
- Community/sports hall (indicative location)
- Early years centre (indicative location)
- ✱ Indicative location of local centre building
- Vehicular access - main (with pedestrian and cycle access) (indicative location)
- Vehicular access - private (with public pedestrian and cycle access) (indicative location)
- Pedestrian and cycle access (indicative location)
- Pedestrian access (indicative location)
- Main street (indicative) with pedestrian and cycle route
- Bus only link (indicative)
- Private vehicular access to third party land
- Pedestrian and cycle route
- Pedestrian route





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