

From: [REDACTED]
Sent: 25 June 2011 18:37
To: Local Plans (Planning Policy)
Subject: Sustainability Appraisal of Core Strategy Submission Document - Consultation

I write to OBJECT to the Sustainability Appraisal Addendum on the following grounds:

1. The SAA process is not clear and transparent.

Ms Laura Graham (H. M. Planning Inspector) wrote to the Council on 11 May 2011; "If you decide to carry out further work on the SA, you must bear in mind that it is an integral part of the plan making process, which should be transparent and open to public participation. It must not be undertaken as an exercise to justify a predetermined strategy."

The Council's web site states "Please note that comments can only be made in respect of the SA Addendum." This is inappropriate because it means no one has the chance to review the SA as a whole.

The council is now seeking additional views on supplementary information on parts of a consultation it undertook years ago. It will be difficult if not impossible for people to make meaningful comments on partial information. To be meaningful the whole SA should be reviewed as a whole.

2. Bearing in mind Miss Graham's comments (above), Cllr Chris Black published comments indicating that alternative sites were viewed but not assessed in detail. He also stated that there had not been a meeting of the LDF sub-committee for over a year, so it is clear the LDF process is not clear and transparent. Is there a clear audit trail showing that all reasonable alternative sites put forward have been properly assessed e.g. rejection of land in east of district?
3. The council's site proposals are directly contrary to their own policy of "no relaxation of the Greenbelt".

Section 1 in the table on page 8 shows the strategic options and that the agreed policy is to protect the Greenbelt. **But** RDC's housing allocations show that no less than 89% of the new housing will be either directly on greenbelt land or on land reclaimed by moving existing industrial areas to greenbelt land. So the council is in clear breach of its own policy!

4. The Council has failed to objectively assess the broad locations for housing growth in the context of environmental issues including Water, Green Belt, Landscape and Transport not just by individual Locations but also by geographical aggregation.

The Forest Heath judgement refers to Article 5 of SEA Directive 2001/42/EC requiring assessment of transport, water, greenbelt and landscape individually and as a whole. These issues in particular are now directly relevant to the recent decision on the Forest Heath Core Strategy as it refers directly to the SEA Directive.

- The Council still needs, therefore, to undertake a detailed, objective assessment of the broad locations taking into account the environmental impacts and all reasonably available alternatives in a fair and objective manner and rank them against each other
- If findings from an earlier assessment are used in a later assessment they need to be updated

and accurate and placed in context of assessment. This does not appear to have happened.

However, even then the Rochford Core Strategy would need to be overhauled significantly to accommodate the changes that would result. It cannot just be a case of retrofitting a solution to justify earlier poor decision making and failure to provide evidence.

5. No evidence that highways impact has been mapped as a whole and no clear strategy. RDC have not carried out a detailed Highways planning assessment of the impact as a whole or of geographically associated sites eg :

- the Rectory Road railway bridge one-way traffic light operation impacted by housing in nearby Ashingdon, Hawkwell and Rochford.
- focussing development in centre of the District at the start but nothing in West until later delaying highways improvements and therefore exacerbating existing bottlenecks.

6 Suppression of the council's DPD Allocations consultation means reconsideration of the original SA is now inappropriate

In paragraph 3.2 Enfusion put forward the DPD Allocations consultation as an evidence of robustness but the council have chosen not to undertake any analysis of this consultation (after 14 mths) and private analysis of that review has shown a 93% rejection rate with less than 2% in favour. Clearly this cannot be regarded as "robust".

7. Fluvial flooding impact only considered when many areas suffer (and/or) from surface water flooding. Both types need to be considered.

8. SEA work carried out in separate work streams by Enfusion and ECC against best practice advice impacting robustness.

Please acknowledge receipt and confirm this response will be shown on the council's website.