

Sustainability Appraisal of the Rochford Core Strategy Submission Document: Addendum



enviromental planning and management for sustainability



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30th September 2010 (by email)

Dear Sam,

**Sustainable Appraisal of the Rochford Core Strategy Submission Document:
Addendum**

Enfusion has undertaken an independent review of the Sustainability Appraisal of the Rochford Core Strategy Submission Document: Addendum and can confirm that the work is compliant with the SEA Directive¹ and relevant regulations, as illustrated in the table below.

Prediction and evaluation of likely significant environmental effects ²	SEA Directive's Requirements ³
<ul style="list-style-type: none"> Effects identified include the types listed in the Directive (biodiversity, population, human health, fauna, flora, soil, water, air, climate factors, material assets, cultural heritage and landscape), as relevant; other likely environmental effects are also covered, as appropriate. 	Directive 2001/42/EC Article 5(1)f
<ul style="list-style-type: none"> Both positive and negative effects are considered, and the duration of effects (short, medium or long-term) is addressed. 	Directive 2001/42/EC Article 5(1)f

¹ EU Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment.

² ODPM (2005) A Practical Guide to the Strategic Environmental Assessment Directive. Appendix 9: Quality Assurance Checklist.

³ See footnote 1.

Prediction and evaluation of likely significant environmental effects ²	SEA Directive's Requirements ³
<ul style="list-style-type: none"> ■ Likely secondary, cumulative and synergistic effects are identified where practicable. 	Directive 2001/42/EC Article 5(1)f
<ul style="list-style-type: none"> ■ Inter-relationships between effects are considered where practicable. 	Directive 2001/42/EC Article 5(1)f
<ul style="list-style-type: none"> ■ The prediction and evaluation of effects makes use of relevant accepted standards, regulations, and thresholds. 	* See note below.
<ul style="list-style-type: none"> ■ Methods used to evaluate the effects are described. 	* See note below.

* The table above does not address all requirements of the SEA Directive as the SA of the Core Strategy Schedule of Changes is an addendum to the SA Technical Report that accompanied the Rochford District Council Core Strategy on submission in January 2010. Appendix 1 of the SA Technical Report (September 2009) outlines how all the requirements of the SEA Directive have been met.

We trust that this is satisfactory but please do not hesitate to contact us if you require any further information or clarification.

Yours sincerely,



Barbara Carroll MSc CEnv FCIWEM MIEMA MIAIA
Director

Sustainability Appraisal of Rochford District Council's Core Strategy Schedule of Changes

This report forms an addendum to the Sustainability Appraisal (SA) Technical Report that accompanied the Rochford District Council Core Strategy on submission in January 2010. This report seeks to undertake an SA of Rochford District Council's Core Strategy Schedule of Changes. The Schedule of Changes sets out proposed changes to the Core Strategy Submission Document in light of the revocation of Regional Spatial Strategies and the issuing of a revised Planning Policy Statement 3 Housing (PPS3). The SA of proposed changes does not seek to repeat the assessment carried out for the SA of the Submission Core Strategy, but rather seeks to assess the changes made to the policies themselves. This report should therefore be read in conjunction with the SA Technical Report (September 2009) that accompanied the Core Strategy on Submission.

The Sustainability Appraisal Process

Throughout the development of the Core Strategy the SA process has been used to assist in planning for the development and the use of land, as required by planning legislation and Government guidance. SA assists sustainable development through an ongoing dialogue and assessment during the preparation of LDF Development Planning Documents (DPDs), and considers the implications of social, economic and environmental demands on land use planning.

During late 2005 a scoping process for Rochford was carried out by Essex County Council to help ensure that the SA covered key sustainability issues relevant to Rochford. Plans and programmes were reviewed and information was collated relating to the current and predicted social, environmental and economic characteristics of the areas. The SEA baseline information profile for Rochford District is updated on an annual basis by Essex County Council. From these studies, the key sustainability issues and opportunities for the LDF and the SA were identified.

An SA Framework was compiled and included SA Objectives that aim to resolve the issues and problems identified; these are used to test the draft DPDs as they are being prepared. This was included in the SA Scoping Report that was sent to statutory consultees. Further updates to the SA Framework were made in 2008. Comments were invited and received from a number of these organisations, which helped to improve the SA Framework.

Appraisal of the LDF Core Strategy Issues and Options 2006

Issues and options were developed initially during early 2006 and were subject to SA in March 2006 by Essex County Council's environmental assessment team. This is reported in the Draft Core Strategy DPD SA/ SEA Environmental Report, issued in September 2006.

Appraisal of the LDF Core Strategy Preferred Options 2007

The development of Issues and Options, and the subsequent appraisals undertaken, informed the development of Preferred Options, which were subject to detailed SA by Essex County Council's environmental assessment team. This was reported in the June 2007 Core Strategy Preferred Option SA/ SEA Environmental Report. Rochford District Council has since significantly revised the Core Strategy Preferred Options Document during 2008.

Appraisal of the LDF Core Strategy Preferred Options 2008

The Preferred Options for the Core Strategy were developed during spring/ summer 2008 and the document was subject to detailed SA by Enfusion in October 2008. The vision and objectives were appraised and performed well against the majority of SA objectives. Each Preferred Option was assessed against the full SA Framework objectives. Where there were any potential adverse effects predicted for sustainability, or opportunities identified to improve the sustainability of the Core Strategy, recommendations were made.

Appraisal of the LDF Core Strategy Submission Document 2009

The emerging Core Strategy Submission Document was developed early during 2009 and subject to SA in August of the same year. A review of the Draft Core Strategy Submission Document was undertaken in June 2009 to establish how the changes made to the Core Strategy since Preferred Options affected the findings of the SA Technical Report (consulted on in November 2008). It was determined that the findings of the detailed SA undertaken for the Preferred Options would not be significantly affected. Therefore further detailed SA work was only undertaken for two new Submission policies. The vision and objectives were also re-appraised due to changes made since Preferred Options.

Uncertainties

Throughout the development of the Submission Document and the SA process, data gaps and uncertainties were uncovered. It is not always possible to accurately predict sustainability effects when considering plans at such a strategic scale. Impacts on biodiversity and cultural heritage, for example, will depend on more detailed information and studies at a site-level. And whilst climate change science is becoming more accurate, it is difficult to predict impacts likely to result from climate change, including synergistic effects. These uncertainties have been acknowledged in the appraisal matrices, where applicable.

Sustainability Appraisal Update

The Core Strategy Submission Document was submitted to the Secretary of State on January 17th 2010. The Examination hearings began on May 11th 2010. A Conservative – Liberal Democrat Coalition Government was elected in the General Election held on 6th May 2010. Subsequently the Regional Spatial Strategy, which set out housing targets, was revoked. This has led to an amendment within the Core Strategy, and in particular to Policies H1, H2, H3 and H7. This report appraises the changes proposed within the Submission Document.

The key changes to policies H1, H2 and H3 entail changes to the temporal aspects of housing delivery, rather than the spatial aspect. In brief, the proposed expansion of residential envelopes of existing settlements remains as per the Submission Document in terms of total quantum, but the time period for which this development will take place has been altered. In terms of changes to Policy H7, this entails a reduction in the provision of Gypsy and Traveller accommodation by one pitch, and the time period for their provision to be elongated.

As per the SA of the Core Strategy Submission Document, the appraisal recognised six categories of predicted effects, as illustrated in the key below. For further information on the method used for the SA, please refer to the SA Technical Report for the Core Strategy Submission document.

Categories of sustainability effects	
Colour	Impact
++	Major Positive
+	Positive
0	No Impact
?	Uncertain
-	Negative
--	Major Negative

Please note, the following is an assessment of the effects of the proposed amendments to the policy, as opposed to the amended policies themselves. As such, it should be read in conjunction with the SA of the Submission Document.

Assessment of changes to Policies H1, H2, H3 and H7 as set out in Core Strategy Schedule of Changes					
SA Objective	Assessment of Effects				
	Nature of the predicted sustainability effect (positive/negative, short/medium/long term, cumulative, scale, reversibility, likelihood)			Evidence and Reference (where available)	Proposed and Potential Mitigation
1. Balanced Communities	Extending the time period over which the housing units will be delivered will ensure the phasing of infrastructure as per the requirements within the Core Strategy. However, the delivery of the required infrastructure will now also be over a	+	?	Rayleigh has the 'best access to services within the District'. There is a surplus of	Extensive community consultation and good design should help to mitigate any concerns relating to regeneration

	<p>longer time period, which may result in short term positive effects being less significant. There will still be a range of developments across various locations in the District which will continue to have a positive effect in terms of regeneration benefits.</p> <p>Extending the time period will also have positive effects on smaller settlements as the total number of houses may be spread over a longer period, giving an increased period of time for infrastructure improvements to be implemented and to allow development to integrate with existing communities.</p>		<p>educational capacity in Great Wakering and Hullbridge - increasing housing capacity in these areas has the advantage of utilising that capacity.</p> <p>The results of community involvement suggests that existing communities in the District are concerned about the provision of additional housing.</p>	<p>and enhancement of existing communities from the construction of new developments.</p>
<p>2. Healthy & Safe Communities</p>	<p>All developments can still be subject to “Safer by Design” principles to meet the requirements of this objective, which will have a positive effect. The proposed amendments to the policy will not alter this.</p> <p>The provision of health and leisure infrastructure will need to be carefully factored in to the design of development and section 106 negotiations. Extending the timescale of housing delivery may have an impact on this, however, as the provision of health and leisure infrastructure could happen later in the time period.</p> <p>The extended time period over which development will be implemented will have an</p>	<p>?</p>		<p>The timing of delivery of additional services and improvements to existing services will need to be carefully considered in terms of the timing of delivery.</p>

	impact in terms of associated infrastructure improvements and enhancements, as these will also be delivered over an extended period of time.			
3. Housing	<p>Extending the time period for the delivery of housing will result in the delivery of fewer dwellings per year. The range and affordability of dwellings will therefore not be as significant, having a negative effect on this SA objective.</p> <p>In terms of the provision of Gypsy and Traveller accommodation, changes to the policy would ensure the provision meets the District's need as identified in the most recent study.</p>	-	<p>Rochford Housing Needs Study 2004 identifies particular needs for affordable housing in Rochford, Hockley and Rayleigh.</p> <p>Rochford Strategic Housing Market Assessment (2008).</p> <p>Essex Gypsy and Traveller Accommodation Assessment (2009).</p>	Careful consideration will need to be given to the type and tenure of housing provided in the District and the timings of delivery of this, to ensure that the housing needs of the District are met.
4. Economy & Employment	The extended time period for housing delivery has the potential to reduce the short term positive effects of the proposed development on the economy. However, there is the potential that there will be greater positive effects on the economy in the long term as a result of the extended phasing.	?		Joint working with businesses and the Economic Development team may help to mitigate the effects of more drawn out benefits to the economy.
5. Accessibility	Extending the time period over which development will be delivered will have a minimal impact on the accessibility of sites. Delays to the release of Green Belt for residential development may further encourage the redevelopment of Brownfield sites within existing settlements which	?		

	have the potential to be in locations that are more accessible.			
6. Biodiversity	Policies H2 and H3 of the Core Strategy Submission Document directed development away from areas of ecological importance in any case. This will not change as a result of the proposed amendments to policy.	0		
7. Cultural Heritage	The proposed changes to the Core Strategy are not likely to have any significant effects on this SA objective.	0		
8. Landscape & Townscape	The proposed changes will not have a significant effect on landscape and townscape.	0	PPG2. One of the five purposes of the Green Belt is to safeguard the countryside from encroachment.	Refer also to policy G1, which aims to minimise effects on the valued aspects of the Green Belt.
9. Climate Change & Energy	Extending the length of time development will be delivered may have a positive effect on this SA objective as a result of reduced energy use. The Code For Sustainable Homes sets a staggered target, so the houses constructed toward the end of the time period are more likely to have to meet more stringent sustainability targets, thus decreasing the impact on climate change and reducing greenhouse gas emissions.	+	?	Other policies within the Core Strategy, particular those which will ensure new dwellings have meet Level 3 of Code for Sustainable Homes will help to mitigate against increased emissions.
10. Water	Extending the time period for dwellings to be developed will have a positive effect on water usage and the quality of the water courses within the District as there will be fewer dwellings built per year. This will result in less pressure on wastewater	+		South East Essex is the driest part of the UK. Essex Thames Gateway Water Cycle Study – Scoping Study (2009). Effects can be mitigated through strong policies on SUDS and water efficiency and appropriate planning

	treatment and water resources, and through the implementation of SUDS within all developments, a positive impact in terms of flood risk.			and design. Environment Agency involvement and consultation with infrastructure providers in developing detailed site allocations should ensure no adverse impact on the water environment.
11. Land & Soil	The proposed changes will ensure that Green Belt land that has not been reallocated will be protected for a longer period of time.	+		The effects on land and soil will be partially mitigated through strong policies on greenways and green infrastructure elsewhere in the plan. In addition, there are opportunities elsewhere in the Local Development Framework to ensure that the best and most versatile agricultural land is protected, particularly through the Allocations Development Plan Document.

12. Air Quality	The proposed changes will not have a significant effect on air quality in the District.	0		Policy ENV5 aims to minimise air pollution, in mitigation of the effects from an increased population. Policies T2, T3 and T5 will also help to mitigate the effects through improving sustainable transport provision.
13. Sustainable Design & Construction	The Code For Sustainable Homes sets a staggered target, so the dwellings constructed toward the end of the time period are more likely to have to meet more stringent sustainability targets. Extending the time period for the delivery of housing will therefore result in a greater number of dwellings meeting a higher standard of the Code for Sustainable Homes.	+		
<p>Summary: The proposed changes to policies H1, H2 and H3 relate to the extended phasing of housing proposed in the Core Strategy. This extended delivery time was found to have positive effects for SA objectives relating to the environment, including water, climate change and land and soils. Extending the time period for the delivery of housing will result in the delivery of fewer dwellings per year therefore reducing pressure on environmental resources. Dwellings constructed toward the end of the time period are also more likely to have to meet more stringent sustainability targets. The Code for Sustainable Homes has staggered targets; extending the time period for the delivery of housing could therefore result in a greater number of dwellings meeting a higher standard of the Code for Sustainable Homes, having positive effects on water and climate change.</p> <p>The delivery of fewer dwellings per year - as a result of the extended phasing - could have a negative effect on housing as the range and affordability of housing each year will be less significant from that which was previously proposed.</p>				