

Sustainability Appraisal of the Allocations Submission Document – Schedule of Modifications

October 2013

Introduction

This report forms an addendum to the Sustainability Appraisal (SA) Technical Report that accompanied the Rochford District Council Allocations DPD submission document which was submitted for formal examination on 18 August 2013. This report seeks to undertake an SA of Rochford District Council's Allocations DPD Schedule of Changes. The Schedule of Changes sets out proposed changes to the Allocations Submission Document in light of the Planning Inspector's suggested changes to the document in order to make it sound and legally compliant. The SA of proposed changes does not seek to repeat the assessment carried out for the SA of the Allocations DPD, but rather seeks to assess the changes made to the proposals themselves. This report should therefore be read in conjunction with the SA of the Allocations Pre-Submission Document.

Sustainability Appraisal Process

Throughout the development of the Allocations DPD the SA process has been used to assist in planning for the allocation of land, as required by planning legislation and Government guidance. SA assists sustainable development through an on going 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.

Regulation 25 Discussion and Consultation Document:

The initial stage of the Allocations Document set out a number of site specific options for several land use allocations, including locations for housing and employment development, leisure uses, community uses and open space. This document was published for a formal six-week consultation period between 17 March 2010 and 30 April 2010. The purpose of this document was to provide residents, landowners and other interested parties with the opportunity to consider and comment upon the allocation options that had been suggested for potential development.

Post Regulation 25 Consultation Work:

The main issues raised during the consultation were in relation to the provision of housing (including the options considered for a Gypsy and Traveller site), the release of Green Belt land, defensibility of Green Belt boundaries and the delivery of appropriate infrastructure (including highway improvements and access to services and facilities). The majority of responses were objections by members of the public to the general locations for Green Belt release and the site-specific options considered for development. Respondents also objected to the options considered for new employment land to the west of Rayleigh. A significant number of responses were also received objecting to the redevelopment of Eldon Way/Foundry Industrial Estate and its inclusion within the town centre boundary.

Several alternative site options for housing and employment land were suggested during the consultation and were appraised within the Discussion and Consultation Document Sustainability Appraisal (July 2012).

Concept Statements were produced setting out site-specific requirements for the delivery of infrastructure. The Council consulted the local highways authority (Essex County Council) in particular on the potential options for residential and employment development, informing more detailed highways and access/egress requirements for the sites proposed in the Submission Document.

The Concept Statements also ensured that the proposed sites would enable the creation of defensible Green Belt boundaries.

Pre-Submission Document

The Allocations Submission Document was published in November 2012, and it was subject to an eight-week pre-submission consultation period from 29 November 2012 to 25 January 2013.

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A proposed schedule of changes was subsequently drawn up taking into account these. The Environment Agency submitted objections; but these were subsequently withdrawn following additional information becoming available.

The impact upon highways was raised as a key issue in respect of the Allocations Document. This falls within the remit of Essex County Council. Rochford District Council met with representatives of ECC on 22 February 2012 to discuss the potential options for the allocation of land for residential and employment uses. This discussion was used to inform the proposed sites for housing allocation and specific requirements within Concept Statements. A further meeting between officers and ECC was held on 30 August 2012 to discuss specific issues relating to proposed site allocations for residential and employment uses.

Neighbouring authorities including; Basildon Borough, Castle Point Borough, Chelmsford City, Maldon District and Southend Borough Councils. Essex County Council was also contacted on 5 November 2012. They were informed that the draft Allocations Pre-Submission Document was approved by the Local Development Framework Sub-Committee on 27 October 2012 and that it would be taken to Full Council on 27 November 2012. Officers and members were provided with an opportunity to raise concerns relating to the draft allocations.

Several neighbouring authorities took the opportunity to comment, three such authorities responded formally during the pre submission consultation (Basildon Borough, Castle Point Borough and Chelmsford City). Essex County Council also submitted representations. The Council provided these authorities with a summary of the consultation responses received from specific and general consultation bodies, together with RDC Officers' initial response to issues raised, and these fed into the production of a proposed schedule of changes to the Allocations Submission Document. Officers were invited on 14 March 2013 to submit any comments on the proposed schedule of changes or to meet with the Council to discuss this further.

Submission Document

The Allocations Submission Document was submitted to the government for independent examination on 18 April 2013. Following this examination the Planning Inspector made several suggestions to RDC regarding the Allocations Document, which he felt would ensure that the Document was sound and legally compliant.

Sustainability Appraisal Update

Based on the Inspector's suggestions a number of changes to the Allocations Document have been proposed. These changes will be assessed as part of this updated Sustainability Appraisal.

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The changes discussed below relate to the Allocations Submission Document (post –pre-submission consultation) April 2013.

HRA

None of the changes proposed following the examination of the Allocations Document have any impact on sites protected under the Habitats Directive.

Scoping Exercise

A scoping exercise of the Schedule of Modifications was undertaken to determine which of the proposed modifications to the Plan would likely have an impact on the SA objectives. Through the scoping exercise all modifications which would have a potential impact on the sustainability objectives set out in the SA were assessed as part of this Allocations SA Addendum Document.

In addition, it should be noted that the following includes an assessment of the effects of the proposed amendments to the policy, as opposed to simply the amended policies themselves. As such, it should be read in conjunction with the SA of the Submission Document.

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

--	Major Negative
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Assessment of MM18		
SA Objective	Assessment of Effects Nature of the predicted sustainability effect (positive/ negative, short/medium/long term, cumulative, scale, reversibility, likelihood)	
1. Balanced Communities	<p>The removal of the 5% cap in the amended policy creates greater flexibility in terms of the total number of dwellings that can be provided on this site.</p> <p>Despite the removal of the 5% cap the Allocations Document still requires that developers should demonstrate that the additional dwellings are required to maintain a five year-land supply and that the additional number of dwellings to be provided on the site is required to compensate for a shortfall of dwellings that had been projected to be delivered within the location identified in the adopted Core Strategy. As such, this change would result in no significant effects on balancing communities.</p>	+
2. Healthy and Safe Communities	No significant effect.	0
3. Housing	The settlement extensions identified in the allocations include text indicating the overall level of additional housing that will be permitted. As such when assessed against the previous policy iteration the amended policy will result in negligible in terms of the amount of housing that can come forward. It will however provide a greater degree of flexibility in respect of housing number to be	+

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	provided on individual sites, which has the potential to assist in the provision of the required housing for the District.	
4. Economy & Employment	No significant effect.	0
5. Accessibility	No significant effect.	0
6. Biodiversity	No significant effect.	0
7. Cultural Heritage	No significant effect.	0
8. Landscape & Townscape	The modification to the policy will ensure that there is a stronger green belt boundary to the west of the site.	+
9. Climate Change & Energy	No significant effect.	0
10. Water	No significant effect.	0
11. Land & Soil	No significant effect.	0
12. Air Quality	No significant effect.	0
13. Sustainable Design & Construction	No significant effect.	0
	<p>Summary: The proposed change to MM18 concerns the removal of the 5% cap on the amount of additional housing that would be permitted on the sites SER1-9 in the Allocations Document. This modification was found to have no significant impact with regards to most of the SA objectives and was generally positive with regards to housing & landscape and townscape. The removal of the 5% cap was found to provide more flexibility for the site to meet the housing demand of the District and local community. The Allocations Document still sets out several criteria which must be met before additional housing can be included on the site. Subsequently the removal of the 5% cap increases the flexibility of the site to deal with housing need, while the Allocations Document still provides sufficient protection against inappropriate development. The effects of this change are therefore positive.</p>	

Assessment of MM20		
SA Objective	Assessment of Effects	

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	Nature of the predicted sustainability effect (positive/ negative, short/medium/long term, cumulative, scale, reversibility, likelihood)	
1. Balanced Communities	<p>The removal of the 5% cap in the amended policy creates greater flexibility in terms of the total number of dwellings that can be provided on this site.</p> <p>Despite the removal of the 5% cap the Allocations Document still requires that developers should demonstrate that the additional dwellings are required to maintain a five year-land supply and that the additional number of dwellings to be provided on the site is required to compensate for a shortfall of dwellings that had been projected to be delivered within the location identified in the adopted Core Strategy. As such, this change would result in no significant effects on balancing communities.</p>	+
2. Healthy and Safe Communities	No significant effects.	0
3. Housing	The settlement extensions identified in the allocations include text indicating the overall level of additional housing that will be permitted. As such when assessed against the previous policy iteration the amended policy will result in negligible in terms of the amount of housing that can come forward. It will however provide a greater degree of flexibility in respect of housing number to be provided on individual sites, which has the potential to assist in the provision of the required housing for the District.	+
4. Economy & Employment	No significant effect.	0
5. Accessibility	No significant effect.	0
6. Biodiversity	No significant effect.	0
7. Cultural Heritage	No significant effect.	0

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8. Landscape & Townscape	The modification to the policy will ensure that there is a stronger green belt boundary to the west of the site.	+
9. Climate Change & Energy	No significant effect.	0
10. Water	No significant effect.	0
11. Land & Soil	No significant effect.	0
12. Air Quality	No significant effect.	0
13. Sustainable Design & Construction	No significant effect.	0
	<p>Summary: The proposed change to MM20 concerns the removal of the 5% cap on the amount of additional housing that would be permitted on the site. This modification was found to have no significant impact with regards to most of the SA objectives and was generally positive with regards to housing & landscape and townscape. The removal of the 5% cap was found to provide more flexibility for the site to meet the housing demand of the District and local community. The Allocations Document still sets out several criteria which must be met before additional housing can be included on the site. Subsequently the removal of the 5% cap increases the flexibility of the site to deal with housing need, while the Allocations Document still provides sufficient protection against inappropriate development. The effects of this change are therefore positive.</p>	

Assessment of MM22, MM25, MM26, MM27, MM29, MM20		
SA Objective	Assessment of Effects Nature of the predicted sustainability effect (positive/ negative, short/medium/long term, cumulative, scale, reversibility, likelihood)	
1. Balanced Communities	The amended site boundary outlined in MM22 will ensure that the site can establish a more robust greenbelt boundary than its predecessor. This will prevent future undesirable and unsustainable expansion of the site. It will also protect unwanted expansion into	+

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	<p>the Green Belt.</p> <p>Development in this location would still have a positive impact on balanced communities because of its proximity to community services and faculties.</p>	
2. Healthy and Safe Communities	<p>The modification to reduce the distance of proposed housing on the site, from no less than 60 metres to no less than 30 metres away from the electrical pylons, as proposed in MM29 will have no significant impact on the health and safety of residents as the recommended safe distance from this type of pylon, is 30 metres rather than 60 metres (as was previously stated).</p> <p>Whilst residential development would be permitted closer to the electricity pylons under the proposed changes, overall the policy would still have a positive impact on healthy and safe communities.</p>	0
3. Housing	No significant effect.	0
4. Economy & Employment	No significant effect.	0
5. Accessibility	The proposed change to the site boundary will have a positive impact on accessibility compared to the previous options because it could enable the requisite access/egress points on to London Road to be within the site boundary rather than in the Green Belt as was previously proposed.	+
6. Biodiversity	No significant effect.	0
7. Cultural Heritage	No significant effect	0
8. Landscape & Townscape	<p>The addition of a strong green buffer along the western boundary will have a positive impact on landscape.</p> <p>The amended policy would have more of a long term positive impact on this objective than the previously proposed site boundary. It would provide a more defensible Green Belt boundary using</p>	++

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	<p>permanent features. However this is also balanced by the fact that it would involve using more of the Green Belt in this location because of the larger site area.</p> <p>Both options perform less well than the baseline option of not allocating the site.</p>		
9. Climate Change & Energy	No significant effect.	0	
10. Water	No significant effect.	0	
11. Land & Soil	<p>The extension of the sites boundary will result in the allocation of additional Green Belt land, for residential use, resulting in the potential loss of additional greenfield land (MM20).</p> <p>The allocation of this additional 30m wide strip of land would however give rise to the potential to provide the access road within the site boundary to the west – thereby reducing the amount of development on greenfield to the west.</p> <p>Both options perform less well than the baseline option of not allocating the site.</p>	+	-
12. Air Quality	No significant effect.	0	
13. Sustainable Design & Construction	No significant effect.	0	
	<p>Summary: The above modifications concern amendments to the Policy SER1. The extension of the site boundary has a positive effect on the SA objectives. Although it constitutes additional expansion into the Green Belt. It will ensure a stronger Green Belt boundary along the north eastern boundary of the site.</p> <p>The modifications entail a reduction of the distance between the adjacent electricity from 60 metres to 30 metres. This is still a suitable and safe distance and as such there is no negative impact compared to the previous iteration of the</p>		

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	<p>policy.</p> <p>Although the extension of the site boundary to the north east does mean that more Green Belt will be lost for allocation which is negative. The extension ensures that there is potential for the proposed access road to be within the site boundary.</p>
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Assessment of MM28		
SA Objective	Assessment of Effects Nature of the predicted sustainability effect (positive/ negative, short/medium/long term, cumulative, scale, reversibility, likelihood)	
1. Balanced Communities	<p>The change to the policy as set out in MM28 will have a small positive impact on this objective. The change proposed offers greater flexibility in terms of the potential location for the sports field giving rise to the opportunity to provide the facility in a location that best serves the needs of the community.</p> <p>Additionally the updated policy also explicitly states the requirement that the new Sports and Social Club should be located so that it can provide advantages to the community and allow for social events to be held at the club house. This will have positive consequences for the local community.</p>	+
2. Healthy and Safe Communities	<p>The presence of the sports field and related sporting facilities will have a positive impact on the health of the local community.</p> <p>Whilst the change proposed in MM28 does not in any way reduce the potential positive effects of the sports field and facilities nor does it directly enhance them.</p>	0

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	As such the change generates no impact beyond that of the original policy.	
3. Housing	No significant effect.	0
4. Economy & Employment	No significant effect.	0
5. Accessibility	The suggested change set out in MM28 makes the policy less prescriptive than it formerly was. Allowing for the location of the Sports and Social Club to be better related to the context of the development.	+
6. Biodiversity	No significant effect.	0
7. Cultural Heritage	No significant effect.	0
8. Landscape & Townscape	The suggested update to the policy means that there is more flexibility regarding the location of the Sports and Social Club. This provides the opportunity to find a location for the Club in an area that has less impact on the landscape. However as the exact location of the new Sports and Social Club site cannot be explicitly predicted it unclear as to the whether the Club's location will have a more positive effect that it would have following the more prescriptive approach set out in the previous version of the policy.	?
9. Climate Change & Energy	No significant effect.	0
10. Water	No significant effect.	0
11. Land & Soil	The initial policy for the relocation of the Sports and Social Club proposed that the Club be located within the site's green buffer. However the amended policy is less explicit as to where the Sports and Social Club should be located.	?
12. Air Quality	No significant effect.	0
13. Sustainable Design & Construction	No significant effect.	0
Summary:		

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	<p>The suggested amendments stated above ensure more flexibility in terms of the potential location of the Sports and Social Club. The amendment would have a positive effect on the local community as it ensures that the Club can be located in a position which is the most beneficial to the local community. Both the Sports field and Social Club can, through the suggested amendment, be well related to in the context of the development. The Field and Club can both be located in areas where they have the best possible impact on landscape and townscape. It is also possible for the Sports Field and Social Club to be located outside of the sites green buffer.</p>
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Assessment of MM31		
SA Objective	Assessment of Effects	
	Nature of the predicted sustainability effect (positive/ negative, short/medium/long term, cumulative, scale, reversibility, likelihood)	
1. Balanced Communities	<p>The removal of the 5% cap in the amended policy creates greater flexibility in terms of the total number of dwellings that can be provided on this site.</p> <p>Despite the removal of the 5% cap the Allocations Document still requires that developers should demonstrate that the additional dwellings are required to maintain a five year-land supply and that the additional number of dwellings to be provided on the site is required to compensate for a shortfall of dwellings that had been projected to be delivered within the location identified in the adopted Core Strategy. As such, this change would result in no significant effects on balancing communities.</p>	0
2. Healthy and Safe Communities	No significant effect.	0
3. Housing	Without the 5% cap there is greater uncertainty as to what level of additional housing, if any, may be developed on the site. Although the Allocations Document still sets out conditions that must be met before additional housing can be included. The amended policy	+

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	creates greater flexibility for the site to meet potential housing need.	
4. Economy & Employment	No significant effect.	0
5. Accessibility	No significant effect.	0
6. Biodiversity	No significant effect.	0
7. Cultural Heritage	No significant effect.	0
8. Landscape & Townscape	<p>There may be some small impact with regards to landscape and townscape as the final number of dwellings included on the site will have an impact on the layout of the settlement. This factor however is not necessarily positive or negative and will depend to some extent on the proposed layout of a future development.</p> <p>There is less certainty regarding the number of dwellings that will come forward on the site. This in turn leads to less certainty regarding the impact that the development will have on townscape. The impact will however still be limited as the number of additional dwellings that can be developed is still restricted within the Allocations Document.</p>	?
9. Climate Change & Energy	No significant effect.	0
10. Water	No significant effect.	0
11. Land & Soil	No significant effect.	0
12. Air Quality	No significant effect.	0
13. Sustainable Design & Construction	No significant effect.	0
	<p>Summary: Amended Policy MM31 concerns the Allocation of SER2. The removal of the 5% cap for the site will have a positive effect. It ensures that there is greater flexibility to provide additional housing on the site, should it be necessary. The Allocations Document sets the specific criteria that must be met before additional housing can be incorporated in the site.</p>	

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Assessment of MM34		
SA Objective	Assessment of Effects Nature of the predicted sustainability effect (positive/ negative, short/medium/long term, cumulative, scale, reversibility, likelihood)	
1. Balanced Communities	<p>The removal of the 5% cap in the amended policy creates greater flexibility in terms of the total number of dwellings that can be provided on this site.</p> <p>Despite the removal of the 5% cap the Allocations Document still requires that developers should demonstrate that the additional dwellings are required to maintain a five year-land supply and that the additional number of dwellings to be provided on the site is required to compensate for a shortfall of dwellings that had been projected to be delivered within the location identified in the adopted Core Strategy.</p>	0
2. Healthy and Safe Communities	No significant effect.	0
3. Housing	Without the 5% cap there is greater uncertainty as to what level of additional housing, if any, may be developed on the site. Although the Allocations Document still sets out conditions that must be met before additional housing can be included. The amended policy creates greater flexibility for the site to meet potential housing need.	+
4. Economy & Employment	No significant effect.	0
5. Accessibility	No significant effect.	0
6. Biodiversity	No significant effect.	0
7. Cultural Heritage	No significant effect.	0
8. Landscape &	There may be some small impact with regards to landscape and	?

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Townscape	townscape as the final number of dwellings included on the site will have an impact on the layout of the settlement. This factor however is not necessarily positive or negative and will depend to some extent on the proposed layout of a future development.	
9. Climate Change & Energy	No significant effect.	0
10. Water	No significant effect.	0
11. Land & Soil	No significant effect.	0
12. Air Quality	No significant effect.	0
13. Sustainable Design & Construction	No significant effect.	0
	<p>Summary: Amended Policy MM34 concerns the Allocation of SER3. The removal of the 5% cap for the site will have a positive effect. It ensures that there is greater flexibility to provide additional housing on the site, should it be necessary. The Allocations Document sets the specific criteria that must be met before additional housing can be incorporated in the site.</p>	

Assessment of MM41		
SA Objective	Assessment of Effects	
	Nature of the predicted sustainability effect (positive/ negative, short/medium/long term, cumulative, scale, reversibility, likelihood)	
1. Balanced Communities	<p>The removal of the 5% cap in the amended policy creates greater flexibility in terms of the total number of dwellings that can be provided on this site.</p> <p>Despite the removal of the 5% cap the Allocations Document still requires that developers should demonstrate that the additional dwellings are required to maintain a five year-land supply and that</p>	0

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	the additional number of dwellings to be provided on the site is required to compensate for a shortfall of dwellings that had been projected to be delivered within the location identified in the adopted Core Strategy.	
2. Healthy and Safe Communities	No significant effect.	0
3. Housing	Without the 5% cap there is greater uncertainty as to what level of additional housing, if any, may be developed on the site. Although the Allocations Document still sets out conditions that must be met before additional housing can be included. The amendment ensures that there is more flexibility with regards to meeting any justifiable additional housing that is required.	+
4. Economy & Employment	No significant effect.	0
5. Accessibility	No significant effect.	0
6. Biodiversity	No significant effect.	0
7. Cultural Heritage	No significant effect.	0
8. Landscape & Townscape	There may be some small impact with regards to landscape and townscape as the final number of dwellings included on the site will have an impact on the layout of the settlement. This factor however is not necessarily positive or negative and will depend to some extent on the proposed layout of a future development.	?
9. Climate Change & Energy	No significant effect.	0
10. Water	No significant effect.	0
11. Land & Soil	No significant effect.	0
12. Air Quality	No significant effect.	0
13. Sustainable Design & Construction	No significant effect.	0
Summary:		

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	Amended Policy MM41 concerns the Allocation of SER5. The removal of the 5% cap for the site will have a generally positive effect. It ensures that there is greater flexibility to provide additional housing on the site, should it be necessary. The Allocations Document sets the specific criteria that must be met before additional housing can be incorporated in the site.
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Assessment of MM45, MM50		
SA Objective	Assessment of Effects Nature of the predicted sustainability effect (positive/ negative, short/medium/long term, cumulative, scale, reversibility, likelihood)	
1. Balanced Communities	The proposed change to the policy would allow facilities including open space to be provided off site providing they were well planned, meet local need, are fit for purpose and are accessible to the local community. Additionally by changing the policy to be more flexible as to the location of these facilities and by allowing them to be developed off site it is possible to ensure that they will be better integrated with the existing community as well as the new development.	+
2. Healthy and Safe Communities	Compared to the earlier iteration of this policy which did not include the allowance for facilities, including open space to be provided off site, the updated policy will ensure that the local community is also served by these facilities.	+
3. Housing	The amended policy will provide greater flexibility in terms of design and density of housing when compared to the earlier version.	+
4. Economy & Employment	No significant effect.	0
5. Accessibility	As the facilities can be potentially accommodated off site. It is possible that, depending on the final layout that arises, they will have	+

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	better connectivity to the existing settlement.	
6. Biodiversity	No significant effect.	0
7. Cultural Heritage	No significant effect.	0
8. Landscape & Townscape	The impact of the facilities on landscape and townscape would depend largely on where they are finally located which would be decided as part of the development management process.	?
9. Climate Change & Energy	No significant effect.	0
10. Water	No significant effect.	0
11. Land & Soil	If the facilities are provided off site. Some treatment of the land and soil may be required. The impact of this is likely to be minimal however.	?
12. Air Quality	No significant effect.	0
13. Sustainable Design & Construction	No significant effect.	
	<p>Summary: Amendments MM45 and MM50 concern changes to SER6a and SER6b the policy which will enable facilities including open spaces to be included in the first phase of the development and to be incorporated of site as long as it can be demonstrated that they are well planned and meet local need, are fit for purpose and are accessible to the local community.</p> <p>The effect of the changes are broadly positive. The amendments ensure that there is more flexibility regarding the location of facilities including open spaces. These now have the potential to be better integrated with the existing settlement.</p> <p>Because the final location of these facilities is not determined the amendment leaves some uncertainty as to what the impact on landscape and townscape will be.</p>	

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Assessment of MM52		
SA Objective	Assessment of Effects Nature of the predicted sustainability effect (positive/ negative, short/medium/long term, cumulative, scale, reversibility, likelihood)	
1. Balanced Communities	No significant effect.	0
2. Healthy and Safe Communities	The proposed specific improvements to Watery Lane will ensure the better safety for drivers using the road, including local residents.	+
3. Housing	No significant effect.	0
4. Economy & Employment	No significant effect.	0
5. Accessibility	The inclusion of specific requirements for the improvement of Watery Lane in the amended policy will ensure that the appropriate improvements are made to the highway in order for it to be able to accommodate the additional housing that is likely to come forward.	++
6. Biodiversity	No significant effect.	0
7. Cultural Heritage	No significant effect.	0
8. Landscape & Townscape	No significant effect.	0
9. Climate Change & Energy	No significant effect.	0
10. Water	Watery Lane is prone to flooding and as such the inclusion of a requirement for specific enhancements to the highway has the potential to engender improvements to the existing situation.	+
11. Land & Soil	No significant effect.	0
12. Air Quality	No significant effect.	0
13. Sustainable Design & Construction	No significant effect.	0
Summary:		

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	The amendments for policy MM52 perform strongly. They ensure that Watery Lane will be suitably improved in order to accommodate the additional housing coming forward.
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Assessment of MM57, MM60	
SA Objective	Assessment of Effects Nature of the predicted sustainability effect (positive/ negative, short/medium/long term, cumulative, scale, reversibility, likelihood)
1. Balanced Communities	No significant effect.
2. Healthy and Safe Communities	No significant effect.
3. Housing	<p>In the amended policy the size of the site would be reduced, through the removal of the western section of the site, this will have a negative impact on the amount of housing within the site. It will also limit the flexibility of the site in terms of how the site can be laid out.</p> <p>The updated policy states that the site will be expected to accommodate 49 rather than 60 dwellings. This relates in part to the reduction in the sites area discussed above. This will have a negative effect as it will provide fewer dwellings to meet housing need in the district.</p> <p>These factors should be considered in relation to the removal of the 5% cap from the policy. This ensures that additional housing can be included on the site as long as it can be demonstrated that the additional number of dwellings are required to maintain a five year-land supply and that they are being provided in order to compensate for a shortfall of dwellings that had been projected to be delivered</p>

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	<p>within the location identified in the adopted core strategy.</p> <p>Whilst the reduction in the number of houses proposed for the site will have a negative impact compared to the previous version of the policy. It is still the case that the modified policy will have an overall positive effect in terms of housing as opposed to, for example, allowing the site to remain as Green Belt land.</p>		
4. Economy & Employment	No significant effect.	0	
5. Accessibility	No significant effect.	0	
6. Biodiversity	No significant effect.	0	
7. Cultural Heritage	No significant effect.	0	
8. Landscape & Townscape	<p>The impact of development on the site is likely to be marginally reduced in line with the reduction in the proposed housing numbers.</p> <p>The deletion of the western section of the site has both positive and negative ramifications. It will reduce the impact that development of the site will have on the landscape and townscape as less of the site would be developed. Less green Belt land would also be lost as a consequence of the amended policy.</p> <p>The remaining section of the site will also be better integrated into the existing settlement when compared to the site proposed in the previous version of the policy.</p> <p>When compared to the baseline option of not allocating the site the amended policy still has a negative effect on landscape, although this is less than the impact that the previous version of the policy would have.</p>	+	-
9. Climate Change & Energy	No significant effect.	0	

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10. Water	No significant effect.	0	
11. Land & Soil	<p>The western section of the site would be removed as part of the amended policy.</p> <p>This amendment would have a positive effect on land and soil as the amended site is smaller than the previous one.</p> <p>When compared to the baseline option of not allocating the site the amended policy still has a negative effect on land and soil, although this is less than the impact that the previous version of the policy would have.</p>	+	-
12. Air Quality	No significant effect.	0	
13. Sustainable Design & Construction	No significant effect.	0	
	<p>Summary: The amended polies MM57 and MM60 concern the removal of the western section of the site. This amendment has a negative impact on housing, however this is mitigated by the removal of the 5% cap on additional potential housing that can be included on the site. The amended policy performs well against the landscape and townscape criterion as it reduces the loss of Green Belt land. Additionally the remaining section of the site would be better integrated into the existing settlement under the amended policy.</p>		

Assessment of MM59, MM70			
SA Objective	Assessment of Effects		
	Nature of the predicted sustainability effect (positive/ negative, short/medium/long term, cumulative, scale, reversibility, likelihood)		
1. Balanced Communities	By removing the western section of the site as stated in the amended policy, the new site will be better integrated into the		+

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	existing settlement. This will have a positive impact on the integration of the existing community and the incoming residents. However, fewer dwellings will be provided to serve the local population, and whilst this small shortfall of housing numbers in absolute terms can be absorbed elsewhere in the District, this would not provide homes for this particular community.		
2. Healthy and Safe Communities	No significant effect.	0	
3. Housing	The proposed change to the policy means that there will be a negative impact in terms of the number of homes that can be provided on this site. However the reduction in the number of homes that can be provided is relatively small and can be absorbed elsewhere in the district.	-	
4. Economy & Employment	No significant effect.	0	
5. Accessibility	No significant effect.	0	
6. Biodiversity	No significant effect.	0	
7. Cultural Heritage	The removal of the western section from SER7 will have a positive effect on cultural heritage as the removal of the proposed housing in this location will ensure that the Grade II* listed St Nicholas Church is retained as a focal point at the western edge of the settlement. Furthermore the views of the church will be protected and it will continue to form a natural end point to the settlement.	++	
8. Landscape & Townscape	The removal of the western section of SER7 will ensure that future development is well integrated into the existing settlement. It also ensures that the natural boundaries of the settlement are maintained and followed more closely. Key visual aspects, including that of St Nicholas Church are protected.	++	-

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	Although the amended site is smaller than its predecessor both versions of the site still perform less well than the baseline option of not allocating the site.		
9. Climate Change & Energy	No significant effect.	0	
10. Water	The introduction of SUDS and other water attenuation controls performs positively when considered in conjunction with the other amendments to policies regarding site SER7, particularly the reduction in the area of the site set out in policy MM59 water and flooding management does not perform differently relative to the previous version of the policy. This is due to the fact that the extent of SUDS required on the site will depend on the size and needs of the site. The remaining section of the site can accommodate appropriate water management and attenuation measures on site rather than in greenfield land or land adjacent to the site.	0	
11. Land & Soil	As the western section of the site will no longer be allocated for housing this will have a positive effect on the land and soil in that location by virtue of the fact that the area will not be developed. Both versions of the policy perform less well than the baseline option of not allocating the site.	+	-
12. Air Quality	No significant effect.	0	
13. Sustainable Design & Construction	No significant effect.	0	
	<p>Summary: The amended policy concerns the removal of the western section of the site allocated in South Canewdon, SER7. The removal of this site will ensure that the remaining land allocation is better integrated into the existing settlement. With the removal of the western section of the site the remaining section will be in line with the natural end point of the settlement which is created by St Nicholas Church. The removal of the western section also serves to preserve the position of the church as a focal point at the western section of the settlement. Key visual aspects of the Church are</p>		

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	<p>also protected as part of the amended policy.</p> <p>The required SUDS can be accommodated on site in response to the removal of the western section of the rather than being incorporated into greenspace or adjacent land.</p> <p>The downside to this amendment is that there will be a small shortfall in terms of the amount of housing that the site can accommodate. This can be met in other areas of the District and through the removal of the 5% cap on additional housing permitted within sites.</p>
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Assessment of MM71		
SA Objective	Assessment of Effects Nature of the predicted sustainability effect (positive/ negative, short/medium/long term, cumulative, scale, reversibility, likelihood)	
1. Balanced Communities	The settlement extension policies within the Allocations Document include text regarding the amount of housing that will be permitted to come forward in each location. As such the removal of the 5% cap will not have a significant effect on balanced communities.	0
2. Healthy and Safe Communities	No significant effect.	0
3. Housing	The settlement extensions identified in the allocations do include text indicating the overall level of additional housing that will be permitted. As such when assessed against the previous policy iteration the amended policy will result in negligible change to the individual sites in terms of the amount of housing that can come forward in each site.it will also provide a greater degree of flexibility in respect of housing numbers to be provided on individual sites,	+

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	which has the potential to assist in the provision of the required housing for the district.	
4. Economy & Employment	No significant effect.	0
5. Accessibility	No significant effect.	0
6. Biodiversity	No significant effect.	0
7. Cultural Heritage	No significant effect.	0
8. Landscape & Townscape	No significant effect.	0
9. Climate Change & Energy	No significant effect.	0
10. Water	No significant effect.	0
11. Land & Soil	<p>The changes to the policy mean that potentially a greater density of dwellings will be developed on the site. This will have a negative effect on the land & soil in its own right and but will have a positive one when compared to the previous iteration of the policy.</p> <p>When assessed against the previous policy iteration the amended policy will result in a positive effect in terms of its impact on land and soil because of the reduction in the size of the site.</p> <p>When compared to the baseline option this policy will still have a negative effect on land and soil.</p>	+
12. Air Quality	No significant effect.	0
13. Sustainable Design & Construction	No significant effect.	0
	<p>Summary: Amended policy MM71 relates to the removal of the 5% cap on the amount of additional housing that would be permitted on the site. This modification was found to have no significant impact with regards to most of the SA objectives and was generally positive with regards to housing & landscape and townscape. The removal of the 5% cap</p>	

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	was found to provide more flexibility for the site to meet the housing demand of the District and local community. The Allocations Document still sets out several criteria which must be met before additional housing can be included on the site. Subsequently the removal of the 5% cap increases the flexibility of the site to deal with housing need, while the Allocations Document still provides sufficient protection against inappropriate development. The effects of this change are therefore positive.
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Assessment of MM79, MM80		
SA Objective	Assessment of Effects Nature of the predicted sustainability effect (positive/ negative, short/medium/long term, cumulative, scale, reversibility, likelihood)	
1. Balanced Communities	No significant effect.	0
2. Healthy and Safe Communities	No significant effect.	0
3. Housing	No significant effect.	0
4. Economy & Employment	The requirement for further integration between SER9b and BFR1 will help to ensure the economic viability and sustainability of the former Brickworks site.	+
5. Accessibility	The new iteration of the policy requires the inclusion of more than one point of access/egress onto the highway network. SER9a and SER9b will both include their own access/egress points. This ensures that both sites will be well integrated with the highways network and the wider settlement. Additionally the amended policy makes the requirement for additional access/egress points compulsory rather than being dependant on the distribution of dwellings and the view of the Highways Authority.	++

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	<p>The changed policy further highlights the need for appropriate integration between the brickworks site (BFR1) and Great Wakering (SER9b).</p> <p>The amended policy provides more flexibility in terms of establishing access/egress points between the site, the existing settlement and the brickworks. This has a positive impact in terms of sustainability.</p>	
6. Biodiversity	No significant effect.	0
7. Cultural Heritage	No significant effect.	0
8. Landscape & Townscape	No significant effect.	0
9. Climate Change & Energy	No significant effect.	0
10. Water	No significant effect.	0
11. Land & Soil	No significant effect.	0
12. Air Quality	No significant effect.	0
13. Sustainable Design & Construction	No significant effect.	0
	<p>Summary: These changes relate to changes regarding the integration of SER9a and SER9b with the existing highways network and with BFR1. The amended policies ensure that the both sites have sufficient flexibility so that they can be linked to the residential development at BFR1 and to one another without having an excessive adverse effect on the existing highways network.</p>	

Assessment of MM83		
SA Objective	Assessment of Effects	
	Nature of the predicted sustainability effect (positive/ negative,	

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	short/medium/long term, cumulative, scale, reversibility, likelihood)	
1. Balanced Communities	As this site will not be developed there will be no positive benefits to the local community in the area. Local employment will not be maintained. The sites potential to act as a focal point for regeneration of the local area will not be exploited.	-
2. Healthy and Safe Communities	No significant effect.	0
3. Housing	No significant effect.	0
4. Economy & Employment	<p>The site has the potential to provide beneficial employment opportunities to the residents of the north of London Road site (SER1). This is now no longer the case.</p> <p>Formerly the site had the potential to accommodate some of the light industrial and office uses that were planned for relocation from Rawreth Industrial Estate (BFR4). Although there is uncertainty over the delivery at the Rawreth Industrial Estate the absence of the South of London Road site will have a negative effect on the surrounding economy which would benefit from the transfer of businesses to the location.</p> <p>Existing business on the site will be retained.</p>	-
5. Accessibility	No significant effect. The removal of this site option will mean that accessibility is not an issue.	0
6. Biodiversity	As the site is not being developed there will be no harmful impact on the biodiversity within the location. As such the amended policy performs more strongly in terms of sustainability. The previous policy would also have had limited negative impact on the areas biodiversity. As such the latter policy performs as well as the former.	+

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7. Cultural Heritage	No significant effect.	0
8. Landscape & Townscape	The existing landscape and townscape will remain unaltered. No trees will be lost as a result of the amended policy.	++
9. Climate Change & Energy	No significant effect.	0
10. Water	No significant effect.	
11. Land & Soil	Some of the site proposed in Policy NEL1 is located on previously developed land whilst some is grade 3 agricultural land. As such development set out in the original policy would have had little significant effect on land and soil in that area with the exception of the agricultural land which would be lost. The amended policy will have no effect on land and soil in the are of previously developed land compared to the original policy. However it will have a more positive effect compared to the original policy regarding the agricultural land, which will not be lost.	++
12. Air Quality	No significant effect.	0
13. Sustainable Design & Construction	No significant effect.	0
	<p>Summary: As this site is no longer being developed it will no longer have any positive impacts regarding objectives such as housing, economy and employment, accessibility etc.</p> <p>There will be several positive impacts on the objectives, compared to the previous policy, including land and soil, landscape and townscape and biodiversity. These will effectively be identical to the baseline option i.e. no allocation of the site.</p>	
	Assessment of MM89, MM91, MM92, MM93, MM94, MM95	
SA Objective	Assessment of Effects	

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	Nature of the predicted sustainability effect (positive/ negative, short/medium/long term, cumulative, scale, reversibility, likelihood)	
1. Balanced Communities	The previous policy is likely to have created an island of development within the Green Belt which was not well related to the existing settlement. This would have a negative impact on the local community. The new position of the site will provide employment facilities in close proximity to the local community.	+
2. Healthy and Safe Communities	<p>The amended policy sites the employment land allocation further to the north. It now abuts the southern boundary of BFR1.</p> <p>This new location will still be able to accommodate local employment requirements as well as the relocation of the Star Lane Industrial estate, which can then be reallocated for residential uses.</p> <p>It also has the potential to be connected to the local highways network in that same way as the original version of the policy.</p> <p>The new version of NEL3 is closer to both the main settlement of Great Wakering and the proposed residential land allocation BFR1 than the original version of the policy. This may have a negative impact on the health and safety of the local community. The road to the Local Wildlife Site and the belt of woodland to the North of the amended NEL3 site can mitigate this risk.</p>	+
3. Housing	No significant effect.	0
4. Economy & Employment	Designation of this site will continue to ensure the retention of local employment opportunities as well as accommodating employment uses displaced from other employment sites in the District.	+

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<p>5. Accessibility</p>	<p>The amended Policy NEL3 performs similarly to the previous version of the policy. It has the capacity be linked to the local highways network, although the amended policy seeks to further reduce the impact on the local highways network by providing one access/egress point to the site with the possibility of this being along the existing access/egress rout for the Local Wildlife Site creating a combined route.</p> <p>The amended policy also states that the inclusion of a roundabout on the Star Lane/Poynters Lane junction should be considered at the planning application sage. A roundabout has the potential to reduce the negative impact of the access/egress point.</p>	<p>++</p>	
<p>6. Biodiversity</p>	<p>The new version of Policy NEL3 is in much closer proximity to the Local Wildlife Site than the previous version. This may have a negative impact on the biodiversity of the Local Wildlife Site. This factor is mitigated by an existing green buffer between the Local Wildlife Site and the proposed allocation site.</p>	<p>+</p>	<p>-</p>
<p>7. Cultural Heritage</p>	<p>The new version of the policy has much the same impact on the historic character and archaeology of the general location as the previous version.</p> <p>There are a significant variety of archaeological deposits in the area with a high likelihood of archaeological survival outside of the quarry areas. The historic landscape has been significantly altered by the quarrying process.</p>	<p>0</p>	
<p>8. Landscape & Townscape</p>	<p>The original NEL3 forms an isolated nucleus of development in the Green Belt. It causes significant harm to the openness and undermines the purpose of the Green Belt.</p> <p>It would rely on the creation of a defensible green belt boundary on three sides and will create a gap between itself and BFR1 which</p>	<p>++</p>	<p>-</p>

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	<p>would be susceptible to further pressure for development.</p> <p>The amended policy will only require the creation of a defensible green belt boundary on two of its sides. As it abuts the southern boundary of BFR1 and the eastern side of Star Lane it also prevents the likelihood of ‘infilling’ that is present with the existing plan for NEL3.</p> <p>The proximity of the amended policy to the existing settlement means that the layout and design of the site should be carefully considered.</p> <p>Overall the amended policy performs more strongly against the sustainability criteria than the previous version of the policy.</p> <p>Compared to the baseline option of no development the proposed amendment would still have a negative impact on landscape and townscape.</p>		
9. Climate Change & Energy	No significant effect.	0	
10. Water	No significant effect.	0	
11. Land & Soil	The amended Policy NEL3 is also situated in on Grade 1 agricultural land and the development of this site will result in the loss of this land for agriculture.	0	
12. Air Quality	<p>The amended Policy NEL3, being closer to the Local Wildlife Site than its predecessor, will potentially have a greater impact on air quality in relation to the Site.</p> <p>The amended Policy NEL3 may also have a greater negative impact on air quality in relation to the existing settlement and the residential allocation for BFR1.</p>	-	

<p>13.Sustainable Design & Construction</p>	<p>No significant effect.</p>	<p>0</p>
<p>Summary: The amendment to policies MM89, MM90, MM92, MM93, MM94 and MM95 relate to the relocation of NEL3 further to the north so that it abuts the Local Wildlife Site to the north and is in closer proximity with sites SER9a, SER9b and BFR1. They also deal with the policy regarding the possible access/ egress routes into and out of the site.</p> <p>Compared to the original policy the amended policy performs positively. It creates a stronger Green Belt boundary avoiding the potential that the previous policy had to encourage infilling of the strip of land to the north and by not forming an island of development within the Green Belt.</p> <p>The sites proximity to the existing settlement and the other allocations for this area was identified as a strong feature that would allow the site to better serve the local community. Additionally the site will continue to be able to accommodate local employment uses.</p> <p>The modified policy for NEL3 was found to have a similar impact on cultural heritage as its predecessor. The area has several deposits of archaeological material in good condition outside of the Brickworks Site itself and the amended policy will affect them in a similar way to its predecessor.</p> <p>The SA assessment identified that the amended policy will decrease the distance between NEL3 and both the settlement and neighbouring residential allocations. This factor combined with the amended allowance for B2 (industrial) uses within the site has the potential to negatively effect the health and safety of the local community. The issue is addressed however in the amended policy which requires the location and impact of B2 uses by considered in terms of their impact on residential amenity.</p> <p>The proximity of the amended policy for NEL3 can potentially be addressed by the use of the green buffer and Local Wildlife Site to the north.</p> <p>In terms of the access/egress routes into and out of the site the amended policy performs well. To reduce the impact on the local highways network the amended policy requires one access route to service this site on Star Lane. It also</p>		

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	proposes the possibility of a roundabout on the Star Lane/ Poynters Lane junction to ease potential congestion. Overall this option performs very strongly in comparison to both the baseline option and the previous version of the policy.
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Assessment of MM100, MM101		
SA Objective	Assessment of Effects Nature of the predicted sustainability effect (positive/ negative, short/medium/long term, cumulative, scale, reversibility, likelihood)	
1. Balanced Communities	No significant effect.	0
2. Healthy and Safe Communities	No significant effect.	0
3. Housing	No significant effect.	0
4. Economy & Employment	No significant effect.	0
5. Accessibility	No significant effect.	0
6. Biodiversity	No significant effect.	0
7. Cultural Heritage	No significant effect.	0
8. Landscape & Townscape	The proposed change to the Coastal Protection Belt would preserve the open landscape of Canewdon.	+
9. Climate Change & Energy	No significant effect.	0
10. Water	No significant effect.	0
11. Land & Soil		0
12. Air Quality	No significant effect.	0
13. Sustainable Design & Construction	No significant effect.	0
Summary:		

	The proposed change concerns an amendment to the Coastal Protection Belt boundary aimed at ensuring that the coastal landscape character of Canewdon is protected.
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Overview

The majority of the proposed modifications to the Allocations Submission Document do not have a significant effect on the majority of the SA objectives. Where the proposed modifications to policies do impact on SA objectives, the impact – whilst there are some exceptions – is generally positive. Sustainability Appraisal of the Allocations Submission Document (April 2013) concluded that, overall, there were significant sustainability benefits to adopting the plan as proposed – this will still be the case if the proposed modifications are incorporated into the plan.