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Rochford District Council
Planning Department
3-19 South Street
Rochford
Essex
SS4 1BW

Our ref: [redacted]

Your ref: SA/SEA addendum June 2011

Date: 30 June 2011

FAO: Samuel Hollingworth

Dear Sir

Sustainability Appraisal Addendum June 2011

Thank you for your consultation on the above document. We have reviewed the document as submitted and wish to make the following comments:

We are pleased to see the production of this document and recognition of the need to summarise alternatives considered throughout the production of the plan and the reasons for selecting/rejecting these sites. However, this document does not seem to cover all sites referred to within the Submission Core Strategy.

At the submission and examination stages of the Core Strategy we raised concerns regarding the assessment of alternative sites in relation to flood risk sequential testing, especially with reference to the inclusion of Stambridge Mills site for housing within policy H1.

A Sequential test was then undertaken (Core Strategy Topic Paper 1). As previously highlighted within our letter dated 20th April 2010, this topic paper does not adequately justify the need for development within Flood Zone 3 at Stambridge Mills. The document states that the SHLAA notes that 'there are adequate areas of green belt that have the potential to deliver housing that are in lower areas of flood risk than Stambridge Mills'. Policy H2 makes it clear that Green Belt land will be released for housing development to meet the districts needs. Therefore Stambridge Mills site, in Flood Zone 3, cannot be justified solely on the basis that Green Belt land, in Flood Zone 1, is inappropriate for housing.

Within this SA addendum, section 3 attempts to appraise alternatives for housing development locations, with reasons for sites being included and excluded. We note that there is no mention of the Stambridge Mills site here. It should be included if you

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wish to (and are able to) justify the need for development here.

Again, within Section 4, employment development, there is no mention of Stambridge Mills and the reasons why it is now no longer viable as an employment site.

Yours faithfully

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End