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Rochford District Council
Planning Services & Transportation Services
Council Offices, South Street
Rochford
Essex, SS4 1BW

Member Correspondence

Dear Sirs

E-Mail: [REDACTED]

Sustainability Appraisal of Core Strategy Submission Document

I confirm that this letter is a formal response from myself with regard to the Sustainability Appraisal of the Core Strategy Submission Document (SA).

I would initially point out that development of the eastern Rochford District as well as within Hullbridge will have an impact upon the Parish of Hullbridge with the routes of Hullbridge Road via Rawreth Lane and Watery Lane both likely to deal with a major part of the increased traffic flow of vehicles to and from eastern part of the District as well as that proposed for Hullbridge itself any development should not proceed until a thorough, detailed and full infrastructure assessment has been undertaken. The roads to the west of the District are already at capacity with current traffic volumes. The housing development will put further strain on the road system but no report or study has been produced to look at the implications.

In addition, the results of the DPD consultation on site allocations which took place in March 2010 have not been made public. 891 replies were made to the consultation from Hullbridge yet they have not been produced or analysed. If these results have not been made public then the process has not been transparent and in my opinion it is therefore illegal and UNSOUND.

Having read and studied the SA my views are unchanged and additional evidence contained in the SA confirms the Core Strategy is unsound and that there are inconsistencies contained throughout the document.

The SA report details how alternatives were considered throughout the production of the plan and sets out the reasons for selecting or rejecting those alternatives. When reading through the document it is evident that these documented considerations were not implemented in the final version of the Core Strategy

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The SA document as a whole appears flawed and I have listed below the more obvious inconsistencies and how relevant they are to the District.

Table 2.1 page 4 Strategic Option 1

The options regarding the Green Belt are shown and it is stated that option A, the relaxation of the greenbelt and B, strategic gaps, preventing coalescence in areas where the greenbelt performs only a token purpose were not taken forward. If this is the case and the greenbelt policy has not been relaxed why is it that over 80% of the proposed sites in the Core Strategy are to be built on greenbelt land? This demonstrates that although a decision not to take options A and B forward was made, the decision has been ignored in the final CS document and therefore a contradiction in the SA is evident.

Table 2.1 page 6 Strategic Option 8

The options for rural exceptions are shown; option B which was the chosen option states for windfall sites, 30% of all units will be required to be affordable. On rural exception sites all units will be required to remain affordable in perpetuity. Council believe that in the call for sites, sites that could be considered as rural exceptions were put forward but dismissed. This again demonstrates that the preferred option chosen has not been implemented in the final CS document.

Table 2.1 page 8 Strategic Option 15

The options regarding compulsory purchase were considered, it is stated that Option C was taken forward, which would ensure that employment, residential, recreational and environmental enhancements for the district can be brought forward using compulsory purchase powers. If this is the agreed option why were sites dismissed during the call for sites process because of the uncertainty of ownership, these sites could have been considered and if necessary compulsory purchase could have taken place. Again this demonstrates that although a decision to take an option forward was made, the decision has been ignored in the final CS document.

Table 2.1 page 8 Strategic Option 16

The options regarding community leisure and tourism facilities were considered and it was agreed that options A and elements of D would be taken forward, A being to protect the greenbelt without providing any further guidance leaving it up to central government in its review of planning policy Guidance Note 2 and D being to provide a policy dealing with community, leisure and tourism proposals which will provide clarity for developments particularly in the greenbelt. Having proposed these two options which would protect the greenbelt the final CS document allows for over 80% of the proposed sites to be built on

greenbelt land? This demonstrates that although a decision to agree options A and D was made, the decision has been ignored in the final CS document.

3. Further appraisal of alternative: general housing development locations. Page 9.

Point 3.2 states that following the Forest Heath ruling it was decided to further develop the appraisal, considering the more detailed locations for development within individual top and second tier settlements, it also states that following DPD discussion and consultation it has enabled further consideration of the realistic locations for development as it incorporates the findings of the call for sites process and the SHLAA. I believe that so many factors of the call for sites and the DPD discussion have remained unpublicised it is difficult to be certain these have been incorporated and considered. This concern is highlighted given the facts detailed above that show complete disregard throughout the CS for the policies agreed through the appraisal document.

Point 3.3 states that detailed appraisals for housing locations were undertaken for each of the top and second tier settlements; what evidence has been provided to support the statement that detailed appraisals of housings locations were undertaken.

I believe that not all sites put forward as viable options for development were considered adequately and as no detailed appraisals have been publicised it is again difficult to be certain how detailed they were. In addition point 3 page 10 and 11 sets out the reasons for selecting or rejection locations.

I have considered the facts that are written for Location 16 South West Hullbridge and note firstly, that the land is actually to the West or North West of Hullbridge and some parts actually lie within Rawreth Parish and not South West Hullbridge (which would broadly encompass the land occupied by Lords Golf Course).

It is stated on page A1-27 that "it is recognised that there is housing need in Hullbridge". No evidence of this housing need has been produced and I have found no evidence to support the building of 500 housing units in a village comprising around 2,700 dwellings of which 4-500 are Park Homes.

It is also stated that the development in Hullbridge would be close to "transport links in Hullbridge Village Centre and links to Basildon/Chelmsford/Rayleigh". The only public transport link is via a bus to Southend via Rayleigh. Public transport to Basildon will require changing to a Train at Rayleigh whilst the only public transport to Chelmsford will be effectively via the X30, a bus that takes people to Stansted Airport and which stops at Rayleigh and does go through Chelmsford. In reality people will be driving to Basildon/Chelmsford/Rayleigh through roads already at capacity but as no infrastructure or traffic flow surveys have been undertaken as part of the CS document these factors will not have been considered or incorporated into the final draft.

It is also stated that "Housing development at Hullbridge won't benefit from the same access to services and employment as development in Rayleigh, Hockley and Rochford/Ashingdon". Hullbridge has very little employment within the village and what there is, is very much based on the service sector. As has been stated virtually all occupiers of the new properties will have to work away from Hullbridge in other areas of the District or other Districts. This is not Sustainable development and makes the policy unsound.

On page A1-28 under water it is stated that "no significant effects identified". A significant part of the land chosen is at or below sea level with a brook running through it that after heavy rain during a high tide has no place to run and floods the low lying land. I would contend that rather than no significant effects any building is likely to increase this effect with a larger amount of water runoff and an increased risk of flooding. At present Watery Lane and its junction with the Hullbridge Road is prone to flooding on a significant number of days each year causing the road to be impassable.

In summing up, there are so many inaccuracies in the SA and so many contradictions, the document could not possibly be classed as a sound basis for the sustainability of the Core Strategy document itself, and rendering the whole process unsound and unacceptable.

Yours faithfully

