

[REDACTED]

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[REDACTED]

Rochford District Council
Planning Services & Transportation Services
Council Offices
South Street
Rochford
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Public Consultation

9th July 2011

Dear Sirs,

Sustainability Appraisal of Core Strategy Submission Document

On behalf of [REDACTED] I confirm that this letter is a formal response and representation of the [REDACTED] views with regards to the Sustainability Appraisal of the Core Strategy Submission Document (SA).

In a previous submission the [REDACTED] objected to the final draft of Rochford District Councils Core Strategy and considered the same to be unsound.

Any development of the eastern Rochford District will have an impact upon the Parish of Rawreth, this is in addition to the impact that the planned development of western Rayleigh will have. With the A1245, A130, A127, Rawreth Lane and London Road (A129) all being the major roads dealing with the traffic flow of vehicles to and from eastern part of the District any development should not proceed until a full, thorough and detailed infrastructure study has been undertaken. The roads to the west of the District are already gridlocked with current traffic volumes. To increase housing development will only put further strain on the already congested road system and yet no report or study has yet been produced to look at the implications of the planned housing.

In addition the results of the DPD consultation on site allocations which took place in March 2010 have not been made public. Over 2000 replies were made to the consultation yet they have not been analysed or publicly produced. If these results have not been made public then the process has not been transparent and is therefore illegal and UNSOUND.

Having read and studied the SA the [REDACTED] views are unchanged and more evidence contained within the SA confirms the [REDACTED] findings that the Core Strategy is unsound and that there are inconsistencies contained throughout the whole document and process.

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

The SA document as a whole appears flawed and we as a [REDACTED] list below what we believe are the most obvious inconsistencies and how relevant they are to our Parish and the District as a whole.

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 how is it that over 80% of the proposed sites in the Core Strategy are to be built on greenbelt land? In addition employment development has also been allocated on greenbelt land as detailed in Point 4, table 4.1 where it states that the allocation of current greenbelt land to the west of Rayleigh was recommended by the Employment Land Study and supported by the SA. 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 very evident, a decision not to relax the greenbelt policy was made but a decision to use greenbelt for employment land was agreed at the same time?.

Table 2.1 page 6 Strategic Option 7

The options regarding accommodation for Gypsies and Travellers are shown and it is stated that option B will have a greater amount of positive effects than option A over the same period of time, option B is stated as the accommodation needs for Gypsy and Travellers will be met by identifying an existing residential area for a site and formally specifying it in the Allocation DPD. Option A states that no Gypsy or Traveller site to be identified in the greenbelt. All the proposed Gypsy and Traveller sites identified and proposed in the CS within Rawreth and western Rayleigh are all within the greenbelt so, again, it demonstrates that although a decision was made stating that option B was the preferred option the decision has been ignored in the final CS document.

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. [REDACTED] 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. [REDACTED] 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, it further states that in addition Rawreth has been assessed as a location, as a response to the CS consultation had suggested it could be considered as an alternative to other Rayleigh locations. Firstly [REDACTED] would ask what evidence has been provided to support the statement that detailed appraisals of housing locations were undertaken. We are aware that the vehicle transporting the

appropriate members stopped at a gateway to Hambro Nursery on their viewing of "Call for Sites" tour for only a few moments.

We have in our possession a copy of a letter to Rochford District Council and full Illustrative Development Proposals for both Hambro Nursery and adjacent Clovelly Works site dated 23rd February 2010, these proposals are for a development to include affordable housing, lower cost small units and family housing plus provision for employment opportunity to be included in the RDC Site Allocation DPD, all of which are identified as essential in the CS. These proposals have been dismissed by RDC.

It should be noted that any development here would not cause any significant or detrimental effect to drainage in the whole area as water would drain directly into the River Crouch and not the existing drainage. Nor would it have a more prominent appearance as is the case for the "North of London Road" site, as stated in Location 7, Landscape and Townscape.

██████████ 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.

██████████ considered the facts that are written for Location 7 West Rayleigh land to the north of London Road and noted firstly, that the majority of the land to the North of London Road is within the Parish of Rawreth and not West Rayleigh as has always been stated in the CS. Secondly the proposed employment areas are also within the Parish of Rawreth. In addition although the site location to the North of London Road may well result in less air pollution and congestion in Rayleigh Town Centre the roads serving the site, the A1245, Rawreth Lane and London Road (A129) are already congested and carry the bulk of traffic to the east of the district. The number of houses proposed for the site to the North of London Road will only increase traffic flow on these major routes 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.

In contrast point 3.3 states that Location 12 Rawreth Village is detached from Rayleigh and relates well to Basildon and Chelmsford. Firstly Rawreth relates more to Rayleigh than Basildon or Chelmsford and has regular bus services to Rayleigh Town. In addition Rawreth has no real Village centre which was a leading factor for the Parish Council supporting the proposals to develop to the east and west of the A1245 incorporating Hambro Nurseries. The ██████████ agreed that a new village centre could be created which would lead to cohesion of the Parish and the potential for small shops and facilities. The development of land to the north of London Road in the opinion of the ██████████ will only lead to Rawreth being more isolated as Rayleigh will grow and Rawreth will lose its identity. Again all the material facts were presented to Rochford District Council but it is felt that the necessary consideration was not given to the sites, and that is shown in the reasons given for selecting and rejecting the sites.

Appendix 1 of the SA, detailed appraisal matrices (housing development locations) abbreviates the appraisals undertaken and their findings and score. [REDACTED] have considered these in detail and consider the summing up to be incorrect and incomplete which renders the findings and the SA unsound.

Page A1-11 Location 7 Land to the north of London Road (Rayleigh)

1. Balanced Communities states that the quantum of development that can be delivered in this location provides sufficient economies of scale to fund/develop facilities required by the community. These facilities are stated as including a primary school, public open space and other community facilities. Within walking distance of the proposed site is the Parish School of St Nicholas. The school has planning permission to double in size allowing it to take in the region of another 100 pupils, in addition other schools in the surrounding area have places available, therefore the need for a new primary school has not been established and an evidence base has not been provided. UNSOUND. In addition west Rayleigh and Rawreth are very fortunate to have a number of open spaces available to them, Sweyne Park, Rawreth Playing Fields, Rawreth Community Garden and the Grange open space, all are within walking distance of the site to the north of London Road so again there is not evidence to support the need for a further open space. Council are of the opinion that the facilities that could be delivered from the economies of scale for this proposed development are not needed and should not have been considered as a contributory factor in choosing this site as a preferred option.

11. Land and Soil. Land to the north of London Road is stated in the SA as being grade 3 agricultural land. [REDACTED] suggest that the land is grade 3A agricultural land and as such under PPS7 comes under the same classification as grade 1 and 2 in that it should be protected.

Page A1-11 Location 12 Rawreth Village

1. Balanced communities states that development of the scale envisaged for the west of Rayleigh would have an adverse effect through overwhelming existing small village community. This is the very reason that [REDACTED] opposed the site to the north of London Road and put forward alternative ideas to enhance the Parish of Rawreth with centralised sites. The commentary given in the appendix completely supports what [REDACTED] have been saying and gives good reason not to develop in such vast numbers yet the proposed site on land to the north of London Road west Rayleigh is still the preferred option. This is a clear contradiction and shows that the evidence base of the SA has not been implemented in the CS and, therefore, UNSOUND.

2. Economy and Employment states that there is minimal employment within the village and that development would promote economic opportunities for the village, it then goes on to state that those opportunities would overwhelm existing facilities. This is yet

another total contradiction, it states there is minimal employment and development would promote opportunities, yet it then states that existing facilities would be overwhelmed. [REDACTED] confirm there are little if no existing facilities so in short there is nothing that could be overwhelmed, this again shows complete lack of intelligence gathering and again shows that the SA and in turn the CS are flawed and unsound.

5. Accessibility states that the location performs poorly on accessibility due to the small size of the settlement and lack of access to shops and services and development at this location would be heavily car dependant. Again the [REDACTED] feel that the relevant appraisal was not carried out. Rawreth currently has two bus services and development would bring more services as the demand for services increased. Battlesbridge station is also within easy access of all the sites proposed in Rawreth however the use of Battlesbridge station with its newly extended service has not featured in any of the CS documents. Any development within the village of Rawreth would favour Battlesbridge as a mainline station into Liverpool street, this would decrease the need for passengers to travel to Rayleigh thus decreasing road congestion and overcrowding on the trains. This once again demonstrates a complete lack of substance to the SA as information gathering has not been thorough enough.

8. Landscape and townscape states that effect on the landscape/townscape is likely to be more significant as housing development of any significant size would overwhelm the existing settlement and development would need to take place in the open greenbelt, counter to the development strategy. Firstly the [REDACTED] would welcome the integration of development in the village. Development could be used to develop a central point in the village which would create community cohesion, therefore having a positive effect on the area. In addition the development would not be on open greenbelt land, the land proposed for development is under glass and concrete and has been previously used and classified as brown field, therefore the grade 3 agricultural land labelling is out of date and again supports the claim the [REDACTED] is making that the SA is not sound and the information contained within is incorrect. Once again contradictions occur throughout the SA, for location 12 the use of greenbelt land is counter to the development strategy, yet for location 7 which is Grade 3A agricultural land no reference is made to the same strategy. Any greenbelt land within location 12 was identified in developers plans and shown as retained for open space and green spaces.

10. Water and drainage : Land in location 7 drains through Rawreth brook with its continual potential flooding problems in existing settlements in Church Road and Battlesbridge .Location12 drains north direct into the River Crouch below Battlesbridge avoiding the above location 7 problems .This again was not assessed in the SA .

11. Land and Soil states that the location is within Grade 3 agricultural land. As stated above the land proposed for development is under glass and concrete and as it has been previously developed and classified as brown field, therefore the grade 3

agricultural land labelling is out of date and again supports the claim that the [REDACTED] [REDACTED] is making that the SA is UNSOUND and the information contained within is incorrect. Any greenbelt land within location 12 was identified in developers plans and shown as retained for open space and green spaces.

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

[REDACTED]

[REDACTED]