
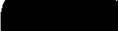


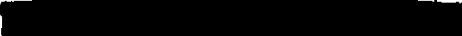


**Core Strategy Sustainability Appraisal (Sustainability Appraisal Addendum)**

I wish to comment on the Sustainability Appraisal Addendum.

Even after a lot of work by professional staff, the document is flawed by inconsistencies and does not prove the case that the council is attempting to make. In places it seems to be an exercise to justify a predetermined strategy.

There is also a lack of transparency in the whole plan making process – for example the council has still not discussed or considered the responses to the Allocations Consultation of over a year ago and indeed the last meeting of the LDF Sub-Committee   was on July 1<sup>st</sup> 2009.

I set out my comments below, concentrating on the parts of the district where I have the most local knowledge .

**Paragraph 3.3 –**

3.3 Detailed appraisals of housing locations were undertaken for each of the top and second tier settlements and Canewdon, with full details provided in Appendix 1. In addition, Rawreth has been assessed as a location, as response to the Core Strategy consultation had suggested this could be considered as an alternative to other Rayleigh locations.

The report does not make it clear that the proposal “North of London Road” is not an “other Rayleigh location”; it is probably going to be for a location within the Parish of Rawreth. The alternative suggestion put forward was for a (smaller) brownfield development in the centre of the parish, as opposed to a larger greenfield development at the edge of the parish with no community focus.

**Appendix 1 , location 7 : “West Rayleigh”.** The commentary seems to give an unduly positive view of the location:

**1. Balanced communities**

The quantum of development that can be delivered in this location provides sufficient economies of scale to fund/develop

facilities required by the community, including a primary school, public open space and other community facilities.

Comment: A new primary school is very unlikely to be required just for 770 homes. The commentary does not acknowledge that the nearest existing primary school, St Nicholas, is in a new building specifically designed to allow future expansion. Additional public open space would only be required IF development went ahead here, as a buffer against complete coalescence with Rawreth.

#### **8. Landscape & townscape**

Within South Essex Coastal Towns Landscape Character Area. A development of the scale envisaged may be more prominent in this location due to the obvious extension into the green belt (and lack of defensible green belt boundaries). However it is noted that the Core Strategy is proposing a new green buffer to the west of this development.

Comment : The negative aspects of this are not properly articulated here. This would be development in the open green belt, contrary to the development strategy. Part of the development might well sit on the crest of the farmland, dominating the view towards Rayleigh. At present the land between Rawreth Lane and London Road has a very defensible and straightforward Green Belt boundary, which would be lost.

**10. Water** Some areas within this location are within flood zone 3, however it is likely that development can be accommodated outside of the flood prone area.

Comment : *"it is likely that development can be accommodated outside of the flood prone area."* – this is alarmingly vague ! The commentary does not recognise that surface water run-off from this development would flow towards Rawreth Brook (as does existing run-off from Rayleigh and parts of Thundersley). Residents are already anxious about possible flooding.

**Appendix 1 , Location 12 : "Rawreth Village"**. This commentary seems to give an unduly negative view of the location:

#### **1. Balanced communities**

Development of the scale envisaged for the west of Rayleigh would have an adverse effect, through overwhelming the existing small village community.

Comment: Rawreth is not a conventional village with a High Street etc. It is a parish of small clusters of homes. The representative voice of Rawreth, the Parish Council, have stated that they "would welcome the integration of development in the village."

#### **5. Accessibility**

This location performs poorly on accessibility due to the small size of the settlement and lack of access to shops and services. Development at this location would be heavily car dependent.

The location is served by two bus routes. More importantly, why is there no mention of Battlesbridge Station – one of the big plus points of this location. ? Rail commuters could go to Battlesbridge instead of imposing extra pressure on Rayleigh.

**8. Landscape & townscape**

Effects on landscape/townscape are likely to be more significant at this location as a housing development of any significant size would overwhelm the existing settlement. Development would need to occur in the open green belt, counter to the development strategy.

Comment : In fact development here (of a smaller quantum than 550) could be accommodated on brownfield land, *not* open green belt. Has the commentary here been accidentally swapped with that for West Rayleigh?

**10. Water** No significant effects identified.

Comment : drainage from this site would go directly northwards into the River Crouch, instead of adding to the problems of Rawreth Brook, which is advantageous compared with other locations.

**Appendix 1 , Location 16: "Hullbridge "**.

**10. Water** No significant effects identified.

Comment : A very surprising statement! No mention that one of the roads that would serve this development, Watery Lane, is the road that notoriously suffers the most from flooding in the entire district. Additional surface water run-off from a large development overlooking the road would only make things worse.

In conclusion, I believe this document, and the LDF behind it, to be unsound.

**[REDACTED]**