

Our Ref: [REDACTED]
Your Ref:
Email: [REDACTED]
Date: July 11, 2011



Planning Policy,
Rochford District Council
Council Offices,
South Street,
Rochford
Essex,
SS4 1BW

By Email

Dear Sir,

ROCHFORD CORE STRATEGY
CONSULTATION ON SUSTAINABILITY APPRAISAL ADDENDUM

On behalf of our clients, [REDACTED] who own the Tithe Park site, and whom we represented at the Core Strategy Examination hearings, we would like to make the following representations on the Sustainability Appraisal Addendum.

We understand that the addendum has been produced following the High Court Ruling *Save Historic Newmarket v. Forest Heath District Council*, which quashed the Forest Heath Core Strategy policies relating to an urban extension of Newmarket and found that the public must be presented with an accurate picture of what reasonable alternatives there were to the proposed policies, in order to comply with Article 5 of the SEA Directive.


In our opinion, the addendum to the Sustainability Appraisal does not fulfil the requirement of the SEA Directive because it does not consider all reasonable alternative options nor does it provide enough detail about the options considered.

The options in the Addendum relate solely to the options for the location of housing and employment. There is no discussion about alternative options for the quantum of development identified in the Core Strategy, nor the potential options for phasing. In some cases the proposed extensions are out of scale with their corresponding settlements but there is no discussion about the sustainability of this.

The Addendum does not consider reasonable alternatives for potential development relating to Great West Wakering. Only 'West Great Wakering' is considered in the housing options for 'Great Wakering' when there are clearly other alternatives to consider: such as land at Tithe Park which our client has been promoting throughout the plan process.

Furthermore, only one location is assessed for Canewdon, and only one location for Hullbridge; although in the case of Hullbridge, 'other areas' are noted as having 'significant constraints' but these 'constraints' are not detailed at all. Nor are the 'other areas' clear.

[REDACTED]



The discussion about the general areas only seems to present the positives of the areas being put forward, and does not consider the disadvantages. For example, in the case of West Rochford, the Hall Road site which is currently the subject to a planning application will, in our view, have a detrimental impact on the landscape. The site is only connected to Rochford on the east, and part of the southern boundary. However there is no discussion about the area's potential impact on the landscape. In the detailed appraisal matrices, in relation to the landscape and townscape objective, it is only stated: "Within South Essex Coastal Landscape Character Area. No significant effects identified". This, in our view, is overly simplistic and does not properly address the potential landscape impact.

The potential to provide a defensible green belt boundary is only considered in six of the eighteen areas assessed in the addendum. This is unacceptable. Given that all of the sites subject to the appraisal are located within the green belt, the potential to form a defensible greenbelt boundary must be given significant weight when considering the suitability of the sites against the 'landscape and townscape' sustainability objective.

The impact on the landscape is not considered in enough detail in the case of South Canewdon. South Canewdon is generally very open and poorly connected with the existing village. Moreover, owing to the lie of the land the houses will be viewed from significant distances and development on this land will have a detrimental impact on the overall rural character of the area.

There is limited discussion about the transport links, and the locations in relation to schools and other facilities. Whilst South East Ashingdon is primarily considered sustainable because of its location to King Edmund Secondary School, the links to existing schools are only considered for five of the eighteen locations.

The proximity to health services is not discussed at all despite the 'healthy and safe communities' objective.

In regard to bus services this is only considered in two out of the eighteen locations. Much discussion about transport relates to minimising traffic, and good links to Southend, Basildon, and Chelmsford are discussed.

There is limited discussion about the impact on wildlife. In relation to West Hockley, there are local wildlife sites and Ancient Woodlands but the impact is marked as unknown. This needs to be considered further in order to adequately assess the impact.

West Great Wakering and South Canewdon are within the Crouch and Roach Farmland Landscape Area which has higher landscape sensitivity than has the South Essex Coastal Towns Landscape Area (where Tithe Park is); and west Hullbridge is a very large designation which is identified for 434 – 652 dwellings. In the SHLAA, this area runs the whole length of Hullbridge and it would be difficult to create defensible boundaries to the west.

Overall, the Addendum does not provide enough analysis of the proposed sites and the potential problems could render these sites inappropriate for residential development.



A sustainable urban extension to Southend in the location of the Tithe Park could be a preferred choice compared with the provision large housing extensions to existing villages and small towns of Rochford.

We trust you will take our comments into account, and please keep us apprised of any further consultations on the Sustainability Appraisal or Core Strategy which may arise prior to the resolution of the Core Strategy.

Yours faithfully,



Director