

**RESPONSE TO THE ROCHFORD
LOCAL DEVELOPMENT FRAMEWORK SUSTAINABILITY APPRAISAL
TECHNICAL REPORT ADDENDUM JUNE 2011.**

- 1. Accessibility of the Documents:** [REDACTED] is concerned that whilst the obligation to consult is recognised, the documents and the jargon therein are largely inaccessible both in a practical sense (these documents are voluminous and only available on the website with a few hard copies in limited locations) leaving members of the public to either download or access the documents on screen and inaccessible in the form of presentation and language used.
- 2. Form of assessment:** [REDACTED] has maintained and still asserts that the form of assessment which purports to be an objective methodology appears on closer examination to be nothing more than a pseudo scientific analysis using subjective opinion that is neither weighted nor validated. Perhaps Rochford (or Enfusion) would care to prove that analysis wrong.
- 3. Strategic Option 5: General Development Locations and timing:**
The appraisal gives no consideration to the cumulative effect of front loading the three housing locations viz South Hawkwell, West Rochford and South East Ashingdon in the period up to 2015. These sites are very closely related with less than half a mile as the crow flies at the closest point and no more than a mile at the most distant point. That together with the employment land proposed at London Southend Airport adds to the almost certain merging of the built area into a single conurbation that extends from Rayleigh in the west through Hockley, Hawkwell and Rochford to the borders of Southend. The assumption that the traffic generated by these developments will flow along Cherry Orchard Way onto the main arterial routes is without foundation, this traffic will undoubtedly add to the congestion on the B1013, Ashingdon Rd and through Rochford, via Warners Bridge (which has a weight limit) if travelling east to Southend or through Hockley on the B1013 to Rayleigh and westwards. Even if the assumption that the traffic generated by these allocations was true and traffic accessed the arterial routes via Cherry Orchard, little thought has been given to the way the local network of roads necessitous to access Cherry Orchard will be able to cope.
[REDACTED] has always favoured strategic option 5 C ie a new settlement to enable the necessary infrastructure to be delivered at the same time and without having the negative impact on the existing settlements. The arguments against this 'that this option would have an increasingly negative impact through out time' are not explained nor quantified.
In addition the chosen option and the timetable proposed loads the majority of housing to a geographically very tight area and leaves no option to use windfall sites to contribute to accommodating the housing needs of the district. In short we will provide enough land to build the housing numbers identified upfront and any windfall will result in additional housing and an even greater concentration.

4. **Use of Greenbelt Land:** It has long been held that use of the Green Belt should be a last resort. In this case the Core Strategy is using Green Belt, and in some cases prime agricultural land, as a first resort. Is this not contrary to the emerging European view that agricultural land will be needed to produce food and is that not an obvious primary test of sustainability?
We cannot agree that, if one accepts the United Nations definition of sustainable development ie '**....is development that meets the needs of the present without compromising the ability of future generations to meet their own needs**', these proposals are sustainable.
5. **Comparison of identified locations for housing:** We are concerned there is grave inconsistency in this review, why has there only been selective comparison between the locations identified for housing? Surely there should be a straight comparison of all the locations with advantages and disadvantages clearly shown and measured objectively to produce a valid and comprehensive comparison.
6. **Specific comment on South Hawkwell Location 14:** The Addendum states that South Hawkwell would positively contribute to the balanced strategy as:
- **It is well related to Southend Airport:** we find the phrase 'well related' as misleading. It is not sufficiently proximate to allow people to walk to any jobs from 'South Hawkwell' so we do not regard this as a positive contribution as people would need to commute to jobs there
 - **There are opportunities to identify sites which would not project into open countryside:** This is as a consequence of the Metropolitan Green Belt (MGB) being flanked by a small amount of ribbon development along the edge of Rectory Rd. To build on the site does however add to the urbanisation of the village and, bearing mind the proximity to the proposed development in west Rochford clearly adds to the coalescence of the two settlements the prevention of which is primary reason for the designation of land as MGB in the first place. This produces a hard line of urbanisation right up to the new line which in any case would be less than half a mile from the proposed development in west Rochford.
 - **The potential to determine a defensible green belt:** we are unconvinced that the green belt would be any more defensible than the current line on the map. Development on this site would produce urbanisation 'right up to the line'. Surely a better way of sustaining settlement separation is to have a softer line and then a clear undeveloped area rather than build right up to the line as this proposal envisages!
 - **The location is well related to recreational opportunities:** There is one privately operated sports and leisure centre near to the site but this can hardly be justified as 'well related to leisure opportunities in general' and is in any case an expensive facility not affordable by everyone.
 - **A sustrans route is also proposed in proximity to this location.** A proposed facility is not a positive until it is there and indeed from what we see so far, these 'facilities' offer little advantage to the inhabitants of the locality and are used by very few.

- **Opportunities for sustainable transport links.** The only comment here in the addendum is as above. However we know from experience that commercial transport operators do not consider running public transport here to be viable and our bus services have been virtually withdrawn. Bus services are notoriously expensive to provide and the introduction of another 175 houses in this area is not likely to change the economics for the transport operators and thus travel will almost certainly be, in the main, by private motor vehicles.
- **Reduction of allocations to Hockley.** We note that during the process of developing the Core Strategy, the proposed allocation of housing to Hockley was reduced from 150 to 50, yet the assessment shows Hockley is much better placed to serve as a sustainable location allowing the overall allocation in locations 13 to 15 to be retained but the South Hawkwell allocation to be reduced to 75 thus sharing the burden and avoiding the massive urbanisation of Hawkwell now being proposed.

Conclusion:

We have seen little evidence that the addendum has been adequately researched and consider it relies on loosely worded subjective judgements that are not quantified or quantifiable.

We are certain that the infrastructure improvements that the proposals would need to be delivered up front will, almost certainly, never materialise. Nor are we convinced that the proposals will provide adequate resources to fund the works needed.

Finally we consider this document in no way satisfies the UN definition of sustainable development and believe it should be roundly rejected.