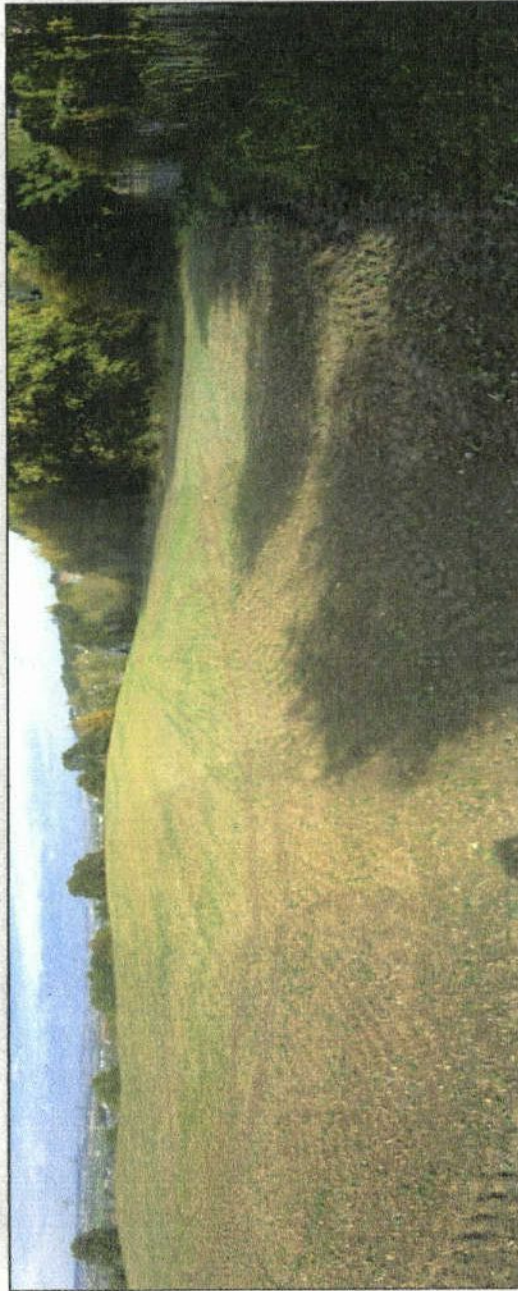


# Rochford Local Development Framework | Core Strategy Sustainability Appraisal Addendum

Response on behalf of Knight Developments Limited  
11<sup>th</sup> July 2011



**ROCHFORD LOCAL DEVELOPMENT FRAMEWORK:**

Sustainability Appraisal/  
Strategic Environmental Assessment

Sustainability Appraisal  
Technical Report  
**Addendum**  
June 2011

 Rochford District Council

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## 1.0 | Introduction

[REDACTED] are making the following representation on behalf of [REDACTED] Limited to Rochford Core Strategy Sustainability Appraisal Addendum.

The aim of the following representation is to reiterate and expand upon the representations made at the previous stage of the document's production, with focus on the Council's Appendix one sustainability appraisal objectives.

Section Two of this document describes the site and the context in which it has reached this stage of the LDF process, Section Three moves on to evaluate the site in relation to the sustainability appraisal objectives and Section Four summarises the findings.



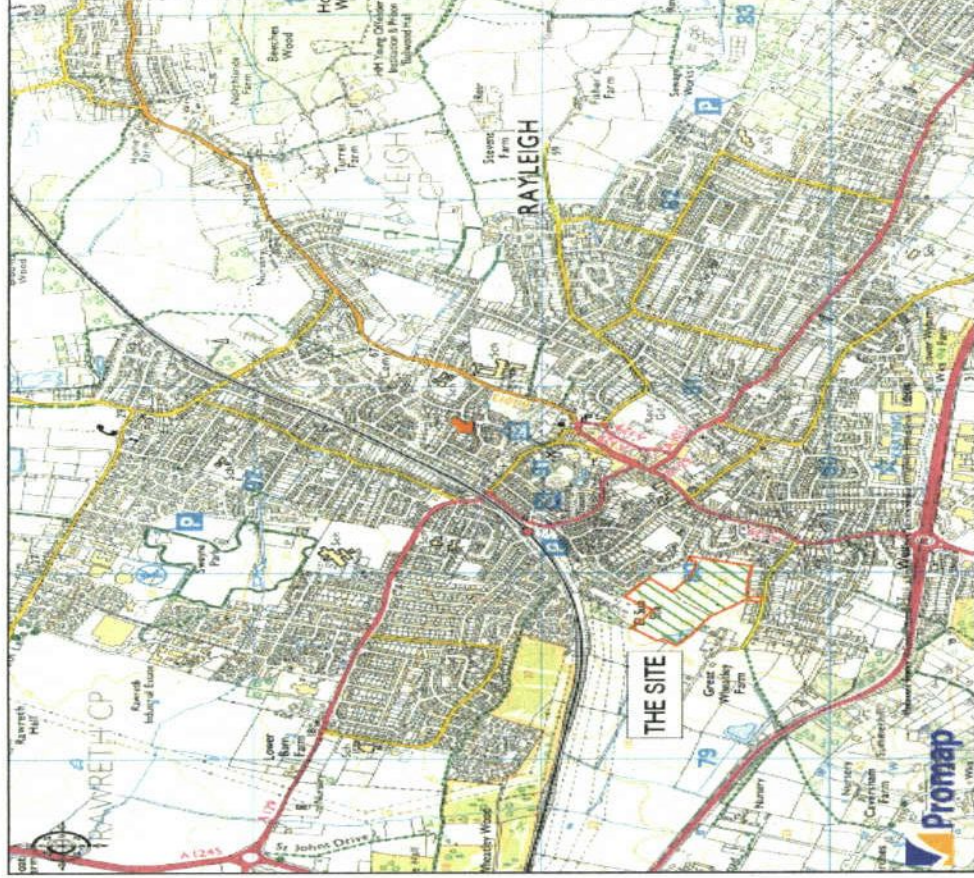
## 2.0 | Site and Context

The site is located approximately 0.7km south west of Rayleigh as demonstrated on the adjacent location plan. The site adjoins an existing residential area.

The site is currently agricultural land bounded by woodland to the north and the Poyntens residential area. Further woodland adjoins the eastern boundary with the existing residential area of the Ridgeway and Burrows Way to the other side of the woodland.

The Great Wheatley Road connects to the High Street (A129) to the east 300m from the site. The A129 runs north to south providing connection to the town centre in the north and the A127 interchange to the south.

The site has been promoted for the residential development of approximately 100 houses throughout the Rochford LDF process. The location of the site is identified in the Sustainability Appraisal Addendum as Location 9.





## 3.0 | Site Evaluation

This section of the report will respond to the Council's evaluation of the site as set out in Appendix 1 based on the following criteria:

- **Balanced communities**
- **Healthy and safe communities**
- **Economy and employment**
- **Accessibility**
- **Biodiversity and Cultural Heritage**
- **Landscape and townscape**
- **Water**
- **Land and soil**
- **Air quality**

## 3.1 | Balanced Communities

The addendum identifies that the quantum of development that can be delivered in this location provides sufficient economies of scale to fund and develop any additional facilities required by the

community, although no significant infrastructure would be required to facilitate the development. The addendum also acknowledges that the site could make an important contribution towards the regeneration of the town centre. As such the site is identified as having a major positive impact on the community. In comparison, although the preferred site in West Rayleigh is also identified as having a major positive impact, significant community infrastructure would be required to facilitate the development such as a primary school, which impacts on the deliverability of the development.

## 3.2 | Healthy and Safe communities

The addendum has assessed the site in relation to this criteria has having an unknown positive impact. This is because although the site has good access to existing open space, the Council is concerned about the possible health implications of significant traffic being routed through the town centre.

The location is identified by the Council as having good access particularly in relation to the proximity to the town centre and Rayleigh railway station. A range of uses are within

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walking distance of the site. Rayleigh benefits from frequent bus services and is within 400m of existing bus stops on the High Street. There is also comprehensive footway provision within the vicinity of the site. There is nothing to suggest that additional traffic associated with the development would have to be routed through the town centre. The Council has produced no evidence to support traffic issues and assumptions are being made. There is no coherent or transparent travel plan and it is considered that the addendum is being made to fit the preferred sites rather than providing an objective assessment of all of the sites.

Although the preferred site at Location 7 has got identified negative impacts on air quality issues, the Council has attributed a Major Positive impact to the issue of healthy and safe communities. This is therefore an inaccurate assessment of the site. The Council identifies that the site is beneficial because traffic heading west and north would not need to travel through Rayleigh town centre. The suggestion therefore seems to be that a site would score well regardless of the traffic generated and its relationship to sustainable forms of transport, as long as the traffic does not have to travel through Rayleigh town centre.

### 3.3 | Economy and employment

As acknowledged by the addendum, the site would have a major positive impact on the issues of economy and employment. The site has excellent proximity to the established town centre which has a good range of existing employment opportunities. Additional housing development in this location will make a contribution to the regeneration of the town centre.

Unlike the preferred site (Location 7), the site performs well based on existing businesses. Location 7 is identified as having a major positive impact on the issues of economy and employment, however it is considered that this is misleading.

Although the site is currently within close proximity of the Imperial Park Industrial Estate, the remainder of the opportunities referred are based on future potential which may not materialise such as the mixed use development and the relocation of businesses from the Rawreth industrial estate.

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Unlike the preferred site (Location 7), the site performs well based on existing businesses. Location 7 is identified as having a major positive impact on the issues of economy and employment, however it is considered that this is misleading.

Although the site is currently within close proximity of the Imperial Park Industrial Estate, the remainder of the opportunities referred are based on future potential which may not materialise such as the mixed use development and the relocation of businesses from the Rawreth industrial estate.

### 3.4 | Accessibility

The site has excellent accessibility, particularly in relation to public transport and this has been identified by the Council. The preferred site at Location 7 is a significant distance from both the railway station and the town centre. Additional highway infrastructure would be required to make the site more accessible to public transport links. This calls in to question the deliverability and affordability of the development.

### 3.5 | Biodiversity and Cultural Heritage

The development of the site would have no impact on biodiversity and this position is supported. The impact on the cultural heritage is deemed to be uncertain, as there are concerns that additional traffic may flow through the Rayleigh Conservation Area. Again, these concerns are unsubstantiated, and there is no evidence to suggest that there will be an increase in traffic that will impact on the Conservation Area.

### 3.6 | Landscape and townscape

Out of the five locations identified in Rayleigh, the development of the land in the south west is the only location that has been identified as having no impact on the landscape and townscape. All of the other sites would have a negative or major negative impact.

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The preferred Location 7 would have a negative impact on the landscape as the site is located within the South Essex Coastal Towns Landscape Character Area. In addition to this, the development of this site would be an extension into the green belt where there is a lack of defensible green belt boundaries.

### 3.7 | Water

No significant impacts are identified and this position is supported. It is interesting to note that at the preferred location, the impact on water is unknown.

### 3.8 | Land and soil

The Council identifies that the development of the site would have a negative impact on this sustainability criteria due to the fact that the land is grade 3 agricultural land, although the land is not actively being farmed.

### 3.9 | Air Quality

The issue of air quality has been identified for all of the sites. The impact on Location 9 has been deemed to be major because of the potential for the increased traffic in Rayleigh town centre. It is considered that this should be classified as an unknown because the Council has no evidence to suggest that the traffic would flow in this way, or, taking into account the accessibility to alternative means of transport, that the town centre would be effected.

The preferred Location 7 has identified potential impacts on the Eastwood Road and High Street Air Quality Management Area (AQMA) along with the Rawreth industrial estate AQMA. However these impacts have been classified as unknown. It is considered that the impacts in relation to air quality for the preferred site should be reallocated to major, particularly when the scale of the proposed development is taken into account.



#### 4.0 | Comparison of Rayleigh sites

The table produced on the next page of this document provides a direct comparison of the five sites considered for Rayleigh. Location 7 is the preferred location of the District Council, and Location 9 is the site being promoted by Knight Developments Limited.

The colour coding used and the impact attributed to each category of sustainability is based on the information produced by the District Council i.e.

Colour	Impact
	Major Positive
	Positive
0	No Impact
	Uncertain
	Negative
	Major Negative

It can be seen from Table 1 that the land to the south west of

Rayleigh performs well when considered against all of the alternative Rayleigh sites. As set out in the previous section, it would appear that in relation to some issues, the preferred site at Location 7 has been viewed more favourably than the some issues on other sites, to ensure that the outcome of the Sustainability Appraisal supports the Core Strategy.

In particular there is concern about the assumptions the District Council has made in relation to vehicle movements through Rayleigh town centre, along with the impact of vehicle movements on air quality. None of these judgements appear to have been made with the benefit of robust or credible evidence.

A comparison of the sites in Table 1 reveals that in reality there is very little between the sites in particular Location 7 and Location 9. It is therefore submitted that Location 9 should be considered as the preferred location for new residential development in Rayleigh.

Table 1: Rayleigh site comparison

	West Rayleigh (7)	East Rayleigh (8)	South West Rayleigh (9)	North Rayleigh (10)	South/South East Rayleigh (11)
Balanced Communities	Green	Green	Green	Green	Green
Healthy and Safe Communities	Green	Green	Green	Green	Green
Economy and Employment	Green	Green	Green	Green	Green
Accessibility	Green	Green	Green	0	Green
Biodiversity	0	0	0	0	0
Cultural Heritage	0	0	0	0	0
Landscape and Townscape	Orange	Dark Red	0	Orange	Orange
Water	0	0	0	0	0
Land and Soil	0	0	Orange	0	0
Air Quality	0	Orange	Orange	0	Orange

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## 4.0 | Summary

The Sustainability Appraisal Addendum identifies the land the subject of this representation as Location 9; one of 5 locations in Rayleigh. The Council's preferred option for development in Rayleigh is Location 7 (North of London Road).

It has been demonstrated in this, and previous representations that the site is extremely well located. It is accessible to an excellent range of transport facilities. The development of the site would lead to an increase in employment and economic opportunities, and would help to deliver the regeneration of the town centre.

The District Council has identified a number of sustainability issues with the site, which are questionable as they are based on opinions and judgements rather than an robust evidence base.

A comparison table of the site produced in this document reveals that there is little to choose between Location 7 and 9 in terms of performance, particularly when you take into account the margin of

error associated with decisions based on opinions and assumptions rather than facts.

It is considered that the Sustainability Appraisal addendum has been made to fit the preferred locations of the District Council rather than providing an objective assessment of all of the sites available.

It is submitted that the land to the south west of Rayleigh performs well against all of the sustainability criteria, and better than the assessment provided by the Council. On this basis, the land at Location 9 should be the preferred location for residential development in Rayleigh.