

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

Central to the concept of sustainable development is an acknowledgement that we must live within our environmental limits. How we use our land is therefore critical.

Sustainable planning should result in the improvement of places and a genuinely sustainable planning system should:

- act in the public interest
- assess and provide for *needs* rather than just meet demands
- prevent development that is inappropriate, unnecessary, poorly located, or of poor quality.
- promote the highest quality development and most beneficial use of land
- only promote development in the most appropriate locations at the most appropriate time

I don't see any evidence of compliance to the above statements within this document.

**1. The Process:**

Firstly I am of the opinion that this process of producing an addendum to the sustainability appraisal is not very clear and transparent and that it has been undertaken (as many processes/documents have) purely as an exercise to try and justify a predetermined strategy.

Secondly the public consultation period of just 4 weeks is inadequate specifically when other documents that need to be referred to in order to understand the content of this addendum are large and only available to most individuals on line, causing difficulties in reading and digesting them.

Even the most simplest of things, for example a key to the score symbols used in the matrix of Appendix 1, would have made the consultation slightly easier for the general public.

Please explain why there has been no reference made to the Core Strategy Revised Preferred Options 2008 (this was also not referenced in the SA September 2009) which raises the main concerns of residents.

**2. Strategic Options:**

Where did these options numbers come from? As I could find no reference to them. Their specific headings are detailed within paragraph 4 of the sustainability assessment but these were very difficult to find given this is a 546 page document; and these are only a summary – hence the addendum is a summary of a summary! Where can the detailed matrix be found?

I have to assume that there was another document somewhere on the RDC website that made this a lot clearer but it was not referenced on the page with this addendum – so I was at a loss as to where these strategic options came from since they do not seem to relate to anything in the Core Strategy!

### **Option 1 – Greenbelt & Strategic Gaps between Settlements**

How has the term strategic gaps between settlements been defined? – as clearly if the allocated sites in South Hawkwell and West Rochford were to go ahead there would be no more than ½ mile between them which surely adds to the coalescence of these two settlements. I don't believe this has been properly assessed to minimise the impact.

The developments allocated within the greenbelt are tantamount to urban sprawl and as is well known this is associated with a number of negative environmental and public health outcomes, with the primary result being increased dependence on motor vehicles.

Much of the district is within flood zones and one of the primary reasons for protecting and enhancing the Green Belt is for it to serve as a water catchment area. Hence retaining it has a positive effect on flood risk and water quality.

Surely from a sustainability viewpoint shouldn't the greenbelt only be allocated for development as a last resort and hence as late as possible? Clearly this is not the case since most allocations are being done from greenbelt and 26% of this greenbelt supply is being allocated within the first 5 years!

Having regard to PPG2 and wider sustainability issues, is it not clearly appropriate to minimise the amount of development that will take place on the Green Belt, and to seek to protect the Green Belt boundary as much, and for as long a period of time, as practicable.

### **Option 4 – Housing numbers:**

The actual size of the allocation housing numbers (as detailed in the CS) for each location should be detailed; to provide overall clarity of the size of each development in relation to the assessments.

Why is the allocation for Hockley only 50 homes? What is the evidence base for this low number when quite clearly Hockley is much better placed to serve as a sustainable location than that of South Hawkwell – which is to deliver 175 homes (all from greenbelt land).

### **Option 5 – General Development Locations:**

I like many of the districts residents would favour option C to provide 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 would have an increasingly negative impact through out time are not explained nor quantified.

There is considerably more than enough locations within the district (as detailed within the Allocations Development Plan Document) to deliver the housing allocations in smaller sites without using the greenbelt.

### **Option 6: Affordable Housing**

Surely this should be provided in areas where the most need has been identified and not in outer town rural locations. Residents who need this type of housing prefer to be in very close proximity to towns. (Rayleigh, Rochford and Hockley)

### 3. **Housing Development Locations:**

There is a lack of clarity and significant ambiguity to the naming of the locations in regard to the actual mapped locations of the Rochford District. I actually live in the West Ward of Hawkwell and yet I believe this is referred to as South Hawkwell – is there a definitive map that identifies all the locations that correspond to the naming within the core Strategy?

The core strategy is too specific in its site locations and hence this sustainability appraisal addendum is not a fair and true representation of the entire district; only focussing on specific locations. Surely this is a strategic document and specific locations should only be identified and detailed following the Allocations Development Plan Document appraisal. I am therefore of the opinion that Option C should be taken forward and not Option D

Why have all the locations within the district not been compared to each other (either in this addendum or in the full Sustainability Appraisal document)– it seems that there has been some very selective comparisons going on. For example Hawkwell has only been compared to Hockley and Rochford to Ashingdon, is there a clear explanation for this approach? Surely this cannot be seen as a transparent and clear process.

I still have great concerns that the locations listed have been selected from predetermined sites within the Allocations Development Plan Document. It is clearly obvious that RDC have decided upon these locations not based on any clear and significant evidence but because they can deliver large numbers of houses in one location which only serves to suit RDC (as it is clearly not supported in any way by any of the residents) and there decision to take forward Option D.

#### **Location 14 - South Hawkwell:**

As a resident of this area I would like to focus on this location and the following:

What is the evidence base to support the statement: *'Development at this location provides an opportunity for regeneration and the meeting of local housing need in Hawkwell'*. 175 homes are being allocated for this area and I would like to see the evidence base that supports this level of need in this village location and why it is considered this rural village needs regeneration.

The statement that South Hawkwell would positively contribute to the balanced strategy as it is well related to London Southend Airport is absolute absurd nonsense, since the only means of accessing the London Southend Airport is by car! Therefore this should not be considered in the assessment because car dependency is neither sustainable nor environmentally sound.

This general location is well related to recreational opportunities as there is a leisure centre situated in south Hawkwell, - this is a privately operated club and could be considered expensive. Some of its facilities are somewhat tired and dated, others are far too oversubscribed with insufficient parking on the site to cater for current users at certain times of the day.

The statement that areas of public open space are in proximity to it (such as Cherry Orchard Jubilee Country Park and Hockley Woods); both of these areas are not within

11<sup>th</sup> July 2011

walking distance and have no suitable public transport to them hence again the car would be used to access these.

A Sustrans route is also proposed in proximity to this general location, how can this even be considered until it is actually in place and the true usage can be determined – I am not convinced that people will use this extensively on a day to day basis and hence reliance on the car will continue regardless.

Opportunities for sustainable transport links, what a laugh the public transport system in this area is virtually non existent! With the train station located at Hockley being at least a 20 min walk and one bus that runs per hour during the day (starting at 7.30am and nothing after 6.30pm). Quite frankly from experience commuters are not going to walk or use a pushbike to the station (because the main road is far too dangerous) and with no buses the car is and will continue to be the main mode of transport for anyone living in his area!

Is there a clear explanation as to why local services and facilities have not been included in the assessment? Maybe this is because RDC did not want to highlight the lack of schools, shops, GP surgeries and dentists in close proximity. As well as having to assess the relative remoteness of this area to access other main town services and facilities.

There is concern expressed about the potential for loss of a wooded area (the main SA details an adverse impact on wildlife) but yet this location is still included regardless of this relevant sustainability consideration.

### **Infrastructure ?**

Nowhere within this addendum could I find a further review of the infrastructure being deemed as sustainable for any of the locations and yet this has been a major concern for residents and councilors alike in the district.

My main concerns are:

It is almost certain that the infrastructure improvements for any proposed planning for any of the location sites that would need to be delivered up front will, almost certainly, never materialise.

Neither is it convincing that any of the proposed sites and subsequent planning proposals will provide adequate resources to fund any of the infrastructure works needed.

### **In Summary:**

There is little evidence that the addendum has been adequately researched and considers it relies on loosely worded subjective judgements that are neither quantified nor quantifiable.

This document in no way satisfies the concept of sustainable development and should be roundly rejected.