

Response to the Rochford District Council Public Consultation on
the Local Development Framework Sustainability Appraisal /
Strategic Environmental Assessment and Sustainability Appraisal
Technical Report, June 2011


11th July 2011

1.0
INTRODUCTION

I refer to the above and to the various letters and other correspondence between RDC and the Inspector that have appeared recently on the Council website. Whilst I acknowledge the further delays to the production of the Core Strategy Submission that will result from this further consultation, I also understand the need to ensure that the Core Strategy is robust and based on a sound evidence base, which is made clear within PPS12, otherwise it can be open to legal challenge as with the Forest Heath example. As I have set out in my previous submissions, the reasons for the rejection of my site at Peggle Meadow have not been based on rationale or sound reasons compared to other sites, and I welcome the current consultation as an opportunity to rectify some of these issues.

1.1
My comments below are therefore based on this opportunity, and will cross-refer to the same paragraph referring within the document.

2.0
BACKGROUND AND SUMMARY

The housing locations assessed in the above consultation document are split into broad locations that number 1 to 18. This consultation response relates to the appraisal of Location 2, South Rochford. This location consists – broadly speaking – of two principal sites that were put forward at the Call for Sites stage of Rochford's LDF: Sites 33 and 64. This consultation response limits itself only to site 33, namely the land at 'Peggle Meadow' to the south of Sutton Court Drive and to the east of Southend Road and Southend Airport.

2.1
For the purposes of this response, the position is taken that Site 33 within the broad 'Location 2' is the only truly viable option for the Council to consider in south Rochford as it is a visually enclosed site that relates very well to existing residential development on two sides and is screened by tree belts and the Prittle Brook to the east and the south (a far more logical and defensible Green Belt boundary option) resulting in a site that, at present, does not

perform a Green Belt purpose and which could be developed in such a way as to not only have no visual impact on the present residential areas to the west and north but – more importantly – no adverse landscape impact upon the open Green Belt space to the east (Site 64), or the area of public open play space at Warner's Bridge Park to the south (in the Borough of Southend-on-Sea). As such, this response relates only to Site 33 within Location 2.

2.2

This response will sequentially address selected issues in the SA as they appear in the document.

RESPONSE TO THE SUSTAINABILITY APPRAISAL.

3.1

In table 2.1 on page 4, Strategic Option 1 states that the options taken forward were a combination of options C and D. It should be highlighted here that in the Preferred Options Core Strategy DPD, strategic gaps between settlements were defined and that no strategic gap was identified between south Rochford and Southend. This has been included in previous responses.

3.2

I would also make clear that under Strategic Option 5, although the SA Addendum suggests that the strategy adopts option E, in reality this is contradicted by the inclusion of the site at Canewdon, a tier 3 settlement and which undermines the CSS as a result.

4.0

Housing Development Options for Rochford/Ashingdon

In table 3.1, it should be pointed out that the site at south Rochford relates equally as well as Location 1 to the sustainability issues of accessibility, economy, and balanced communities, however it relates far better than Location 1 to employment due to its very close proximity to 3 principal areas of employment; 1) Southend Airport, 2) Purdey's Industrial Estate and 3) Temple Farm Industrial Estate. Location 1 does not relate as well to Southend or the Airport as Location 2 does.

4.1

The following table shows our assessment of Location 2 against other options, notably Location 1:

Appendix 1 Amendment	Location 1: West Rochford			Location 2: South Rochford			Notes
	Score	Change To	Equivalent	Score	Change To	Equivalent	
1. Balanced communities	++		2	++		2	
2. Healthy and safe communities	+		1	+		2	Possible impact of competing link of Greenway (see comment with SUSTRANS) understated.
3. Housing							
4. Economy & employment	++		2	+		2	Location 7 given 2 marks for proximity to Chelmsford and Selsdon. Location 2 close to Southford
5. Accessibility	++		2	+		2	Location 2 opposite rail station - not included in assessment
6. Biodiversity	0		0	0		0	
7. Cultural Heritage	+		-1	0		0	
8. Landscape & townscape	0		0	-		0	Loc 7 states obvious extension into the GB (and lack of defensible GB boundaries) and seems same. See text on landscape of location 2.
9. Climate change & energy							
10. Water	0		0	0		0	
11. Land & Soil	-		-2	-		1	Location 2 grade 3, not grade 1 as stated.
12. Air Quality	+		-1	+		-1	
13. Sustainable Design & Construction							
TOTAL			3			8	

4.2

Development at Site 33 would not engender coalescence with Southend as it is an 'infill' site that would not extend built form any further south or any further east than presently exists.

5.0

Housing Development Options for Hockley/Hawkwell

In relation to the appraisal of Location 14, Location 2 would contribute far better to a balanced strategy than South Hawkwell. Location 2 is *far* better related to Southend Airport and is also very well related to the strategic highway network. It is also unsurpassed in its relationship to Southend to the south.

6.0

Housing Development Options for Hullbridge

Hullbridge is not a sustainable area for housing growth. With no rail transport option, a bus service that is not as good as that serving Rochford, Hockley and Rayleigh and no independent sustainable transport links to higher services and amenities, development at this location will result in an over-dependence on the car.

7.0

Housing Options for Canewdon

The same points are made as those made for Hullbridge, in addition to the conflict with the development strategy highlighted above.

8.0

Housing Development Options for Great Wakering

Great Wakering does not relate well to the existing centre of Rochford and associated services. Neither does it relate well to the centre of Southend. With no rail service and no independent sustainable transport links to higher services and amenities, development at this location will also result in an over-dependence on the car.

8.1

The Council states that development at Great Wakering is not subject to significant environmental constraints, therefore – by definition – the acknowledgement is there that environmental constraints do actually exist to further housing growth at this location.

RESPONSE TO APPENDIX 1: DETAILED APPRAISAL MATRIX FOR LOCATION 2

9.0

Objective 1 - Balanced Communities.

I agree with and support the Council's commentary

10.0

Objective 2 – Healthy & Safe Communities

Whilst we agree with and support the Council's commentary, it falls short of stating the full contribution that the location (Site 33) can make to the sustainable connectivity between Rochford and Southend via Greenway No. 18, which is currently shown passing through the site on the Council's Core Strategy Key Plan. Sustrans has already acknowledged the important part the site has to play in this respect.

10.1

The Council has also failed to mention the adjacent Warner's Bridge public open space to which the site would have direct, independent, safe and sustainable access.

10.2

For these reasons, the Council has under-rated the sustainability score for the location in this objective.

11.0

Objective 3 – Economy and Employment

There is indeed the potential for good links between the location (Site 33) and Southend Airport, however the Council states that the railway line makes access difficult. There are two issues that the Council has failed to take into account. Firstly, Warner's Bridge lies immediately to the south west of Location 2 (Site 33). Warner's Bridge provides direct connectivity between the location and Southend Airport. Secondly, Southend Airport is a secure site and therefore access is limited to specific areas – principally from Eastwoodbury Crescent and Aviation Way - both of which are very close to Site 33 via Warner's Bridge.

11.1

Within this Objective, the Council also fails to state the very close proximity of the location to areas of employment other than Southend Airport, namely Purdey's Industrial Estate and Temple Farm Industrial Estate, both of which are within easy walking distance of the location.

11.2

For these reasons, the Council has under-rated the sustainability score for the location in this objective.

12.0

Objective 5: Accessibility

The location (Site 33) is on a comparable radius from Rochford Town Centre to a significant proportion of Location 1. Whilst Location 2 is indeed further from Rochford Rail station, it is very close indeed to the railway station at Southend Airport, which is within a short walk from site 33.

12.1

The site also benefits from direct access to the principal bus route and bus services that run through Rochford and there are bus stops immediately adjacent to the site on Southend Road.

12.2

The location also indirectly benefits from the infrastructure improvements being carried out in Southend as part of the Airport Development and improvements to the route between Rochford and Southend town centre on the A1159 and the A127 (Cuckoo Corner and Victoria Circus).

12.3

For these reasons, the Council has under-rated the sustainability score for the location in this objective.

13.0

Objective 8: Landscape & Townscape

The document suggests that any development in South Rochford would be likely to cause coalescence with settlements in Southend-on-Sea Borough, therefore creating negative effects on landscape & townscape. However, as set out above; Site 33 is extremely well contained, with no views into the site from surrounding viewpoints, and development of the site will have no impact on any perceived strategic space between Rochford and Southend. As also set out above, previous versions of the CS set out strategic gaps between settlements and did not identify one south of Rochford.

13.1

I have commissioned a landscape appraisal of the site within its context, which is not currently available due to the limited time to respond to this consultation. I will send a copy to the Council when ready and will also respond accordingly to further stages of the Site Allocations DPD. However, the advice I have received from my qualified landscape advisor thus far is that development at Peggles Meadow will not have any wider landscape impact, nor affect the purposes of Green Belt policy.

13.2

Development at some other locations will have a far more detrimental effect on landscape, particularly at Location 1. The Council's preferred site at Location 1, north of Hall Road, is open Green Belt. The landscape impact of development in this area will be far more significant and harmful than any development at Site 33 in Location 2, however the Council would appear to be employing a double standard here. The landscape impact is being ignored at Location 1 (presumably on the basis of sustainable location) where demonstrable harm will be done if development is carried out here. At location 2 (Site 33), any development would have no visual impact upon the wider context due to the very high degree of site containment and we assert that Site 33 has a significantly better sustainability profile than Location 1 due to accessibility and proximity to three major local areas of employment.

13.3

It is suggested that in order to mitigate the harm done in the development of Location 1, housing numbers could be reduced at this location (to allow for a greater landscape buffer) and made-up elsewhere, specifically with the release of the highly sustainable site at Peggles Meadow.

13.4

As a consequence, the Council's negative score is unjustified and continues an unsound approach to the assessment of my site.

14.0

Objective 11: Land & Soil

The land at Site 33 is not Grade 1 soil and although shown generally as within Grade 1 on the Agricultural Land Classification Map originally devised in 1969, this is marked as 'provisional', and my land (at specific site level) was, in fact, downgraded to Grade 3 by the M.A.F.F. approximately 25 to 30 years ago as it is extremely stoney and was not conducive to high-quality agricultural production. The evidence to this effect will be sent to the Council shortly and will also be produced during the Allocations DPD consultation process.

14.1

The land at Site 33 is not in agricultural production. It comprises 10 acres and is too small a holding to be viable other than for pigs or chickens, which given the residential location of the surroundings would not be feasible due to amenity problems. The site could be tenanted as part of a wider holding, but access is only possible adjacent to my house via a narrow accessway, again creating problems of amenity and indeed functionality in terms of larger agricultural vehicles gaining access. I have taken advice from agricultural consultants on the possibility of using the land agriculturally, who have endorsed the above. I can provide this evidence if required.

14.2

For these reasons, the Council has under-rated the sustainability score for the location in this objective.

15.0

Objective 12: Air Quality

As Location 2 is so close to excellent sustainable transport links and has excellent connectivity to Southend and A127 to the south, this would have a minimising effect upon any decrease in air quality as a result of development in this location.

15.1

For these reasons, the Council has under-rated the sustainability score for the location in this objective.

16.0

Response to Summary

The Council's conclusion of the positive effects of development at this location is supported, however it is a significant and somewhat bemusing failing of the SA to ignore Warner's Bridge as an existing, convenient railway crossing point that is immediately adjacent to Site 33.

16.1

The Town Centre is a 15-minute walk from Site 33 and, this notwithstanding, there is an excellent bus service between the location and the centre of Rochford.

17.0

SUMMARY AND CONCLUSIONS

Whilst I welcome the further consultation, it regrettably perpetuates a subjective assessment of sites that weighs in favour of those selected by the Council, and unjustly discriminates against sites such as my own at Peggle Meadow (Site 33). I have undertaken a comparative analysis of my site compared to West Rochford, and even allowing for some degree of subjectivity, my site still scores significantly higher in the SA. The lack of any strategic gap; the close proximity and accessibility of Warner's bridge; the close juxtaposition of Southend Airport, its employment and rail station; the close proximity of other main areas of employment and the proximity of the higher order settlement of Southend -On -Sea, are all important considerations. In fact, proximity to other settlements, rail stations, employment etc are all factors that are weighed more strongly in other locations, yet perversely have not been weighted in the case of my site, or have been ignored completely.

17.1

As a consequence the Core Strategy continues to be unsound as it is based on a flawed evidence base, and it is with regret that the Council are put on notice that I will pursue other avenues to challenge the adoption of the CS based on the above.


Monday 11th July 2011