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Dear Mr Hollingworth

**Response on behalf of Christmas Tree Farm Development Action Group (CTFDAG)  
Consultation on Sustainability Appraisal Addendum (SAA)  
Consultation Period Expiring 11 July 2011**

Smart Planning represents CTFDAG. This current response should be read in conjunction with all responses made to date by CTFDAG and with which these comments are consistent.

The scope of the SAA falls well short of the range of matters that should have been dealt with in the original Sustainability Appraisal (SA). The SAA is not paragraph numbered hence we will refer to page numbers and then the paragraph number on that page counting from the top of page. Paragraph 3 on Page 4 states that the key changes to policies relate only to '*temporal aspects*' rather than '*spatial aspect*'. Consequently, the LPA has not revisited any of the matters raised in earlier submissions which should have been put in place to inform the choice of proposed broad locations for housing.

The SAA does not respond adequately to issues raised in the key case *Save Historic Newmarket v Forest Heath District Council*. The Judge referred to Article 5 of the SEA Directive and associated Regulations. Where an environmental assessment is required, then an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme and *reasonable alternatives* taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated.

It has previously been pointed out that the LPA has not undertaken any form of realistic comparative assessment. The LPA had an opportunity in the Inspector's request for an audit trail to show unequivocally where this had been done. The LPA singularly failed to make any such demonstration. The SAA was a final opportunity, as informed by the Forest Heath Court Decision, to remedy the absence of a credible evidence base, but instead it looks only at 'temporal issues' and ignores spatial issues altogether.

The LPA has previously been cautioned about the importance of the SA and its fundamental role in the integrity of the Core Strategy. On 11 May 2011, [REDACTED] advised the LPA in writing that:

**'If you decide to carry out further work on the SA, you must bear in mind that it is an integral part of the plan making process which should be transparent and open to public participation. It must not be undertaken to justify a predetermined strategy'**

It is useful to remember where this requirement comes from. PPS12 states that:

**'The SA should perform a key role in providing a sound evidence base for the plan and form an integrated part of the plan preparation process. Sustainability Assessment should inform the evaluation of alternatives. Sustainability Assessment should provide a powerful means of proving to decision makers, and the public, that the plan is the most appropriate given reasonable alternatives.'**

In the absence of any spatial considerations in the SAA, and bearing in mind the acknowledged lack of evidence to date, then the LPA has missed this opportunity to remedy the omissions in the evidence base. Hence the case for the proposed broad locations for housing in the Core Strategy remains unproven.

Notwithstanding that the only scope of the SAA is in relation to temporal issues. We comment as follows on specific entries in the SAA.

Page 8, Table Heading 8. Landscape and Townscape. The absence of any spatial considerations means that the LPA has failed in its evidence base to consider the landscape and townscape merits of the land at Hawkwell and to compare this (along with other sustainability indicators) with other competitor sites. The LPA has therefore no basis upon which to prove that this site is any more favourable as a broad location over and above any other. This table hides the significant losses to landscape and townscape character that will occur by simply making unsubstantiated proposals for locating housing without going through due process and robust SA in the first instance. Note the cross reference in the fifth column of the table to Policy G1 relating to impact on Green Belt. The LPA has similarly not undertaken a robust analysis of the sensitivity of the Green Belt boundary at any of the proposed broad locations. Land at Hawkwell has some desirable characteristics which have not been 'identified', 'described' or 'evaluated' anywhere in the SA or SAA. This is contrary to the requirements of the SEA Directive and its associated Regulations.

The SEA Directive says, 'identify', 'describe' 'evaluate' NOT 'identify', 'describe' 'allocate' 'evaluate'. If the latter were to be permissible, then the community is being presented with a fait accompli which it is impossible to protest against. This is contrary to basic tenets of Development Plan formation which includes inclusivity and accountability.

Page 10, Heading 12. Air Quality. The failure to adequately address these issues will result in an immediately proportionate adverse impact on air quality in Rectory Road and Thorpe Road arising through traffic congestion. The provision of housing in this area imminently, following the adoption of the Core Strategy (bearing in mind that relevant planning applications have already been put in the public domain) and before significant infrastructure absences have been remedied, will produce an unacceptably high degradation of air quality to the detriment of the ambience and amenity that residents should reasonably expect to endure. As the SAA deals with  
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temporal issues then it should at least phase the provision of infrastructure improvements in advance of strategic housing provision to ensure that reduction in air quality is not imposed through otherwise avoidable traffic congestion.

We conclude by stating that it has been demonstrated that the LPA's Sustainability Appraisal of broad locations for housing is flawed in a number of areas and that the SAA has done nothing to alleviate this position. It is inimical to the Development Plan process for the LPA to defer the consideration of detailed information and studies at a specific site level where in doing so, this invalidates the choice of broad locations. If the base line assessments of broad locations have not been undertaken satisfactorily, then the adoption of these in a Core Strategy will not lead to the choice of the most sustainable pattern of housing when specific sites are chosen.

The SAA was an opportunity to learn from the lessons of others in Save Historic Newmarket v Forest Heath District Council. That lesson has not been learned and the LPA seems determined to carry on its predetermined but unfortunately unevidenced strategy. On this basis we ask the Inspector to declare the Core Strategy unsound so that a proper sustainability analysis of all reasonable alternatives can be undertaken and in doing so allow the community of Rochford District to regain some faith in the integrity of the process of Local Development Framework formulation.

[REDACTED]

Yours sincerely

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