

Appendix B

Landscape and Visual Impact Assessment (CSa Environmental Planning)

Date: October 2012

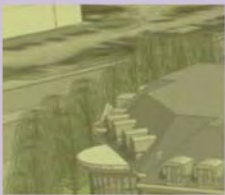
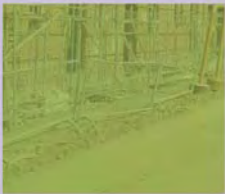
Land West of Hullbridge
Road, Rayleigh

**Initial Landscape and
Visual Assessment**

Prepared by
CSa Environmental Planning

On behalf of
Commercial Estates Group

Report No: CSa/2022/01b



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1.0 INTRODUCTION

Background

- 1.1 CSa Environmental Planning has been commissioned by Commercial Estates Group to prepare an initial landscape and visual assessment for the land west of Hullbridge Road, Rayleigh, in order to assess the suitability of the Site for residential development. The location of the Site is illustrated on the Site Location Plan at **Appendix A** and on the Aerial Photograph at **Appendix B**.
- 1.2 This assessment also considers the impact of releasing the Site from the Green Belt in terms of the functions and purposes of the Green Belt, as well as the nature and durability of the proposed Green Belt boundaries. It also assesses whether there will be any impact on the separation between Rayleigh and the adjoining settlement at Hullbridge.
- 1.3 The assessment goes on to describe the existing landscape character and quality of the Site as well as its ability to accommodate development.

Methodology

- 1.4 This assessment is based on site visits undertaken by a suitably qualified and experienced Landscape Architect in September 2012.
- 1.5 In landscape and visual impact assessments, a distinction is drawn between landscape effects (i.e. effects on the character or quality of the landscape irrespective of whether there are any views of the landscape, or viewers to see them) and visual effects (i.e. effects on people's views of the landscape, principally from any residential properties, but also from public rights of way and other areas with general public access). This report therefore considers the potential impact of the development on both landscape character and visibility.
- 1.6 Photographs contained within this document (**Appendix C**) were taken using a digital camera with a lens focal length approximating to 50mm, to give a similar depth of vision to the human eye. In some instances images have been combined to create a panorama.

2.0 SITE CONTEXT

Site Context

- 2.1 The Site occupies a broadly rectangular land parcel at the northern edge of Rayleigh, west of Hullbridge Road and north of Rawreth Lane. The adjoining settlement at Hullbridge lies approximately 900m to the north. The dwellings and grounds at Lubard's Lodge Farm are indented into the central part of the Site, together with a large man-made reservoir. A line of tall poplar trees are a prominent feature to the south of the reservoir and there is a line of trees alongside the access road leading to the farm. To the east of the farmhouses, and also excluded from the Site boundary, there is a collection of commercial and business units at the frontage with Hullbridge Road.
- 2.2 Mixed development extends along Rawreth Lane to the south of the Site, comprising predominately post war and more recent housing, together with the industrial units at Imperial Park and the adjoining health centre and Asda superstore. Westward the lane exits the settlement leading to the adjoining village of Rawreth some 1.5km distant.
- 2.3 The built up area of Rayleigh extends in depth to the south of Rawreth Lane, with the open space a Sweyne Park a notable relief within the urban fabric.
- 2.4 To the north and west of the Site the adjoining land is criss-crossed by a series of tracks and lanes which provide access to an eclectic mix of residential dwellings, smallholdings, new executive barn developments, small fields, paddocks, a fishing lake and nursery (See **Photographs 21 to 24** in **Appendix C**). The lanes and field boundaries are typically contained by tall treed hedgerows lending this area a well vegetated feel, in contrast to the more open countryside beyond. Mature oak trees are a notable feature within the hedgerows, as are more alien species, such as laurel and leylandii at the boundaries of the residential properties. In addition to residential development, horsiculture is the predominant land-use, however where fields have not been subject to any management, these are reverting to rough grassland and scrub.
- 2.5 Further west is the open, agricultural landscape of the River Crouch valley, which falls gradually towards the river floodplain before rising up once more beyond the route of Woodham Road. This is an extensive landscape of large scale fields and intermittent field boundaries, although woodland blocks are more apparent on the rising ground on the far side of the river to the north east. High voltage power lines and pylons are a prominent feature within the landscape, particularly evident within the largely featureless landscape separating Rayleigh from the adjoining town of Wickford. In addition, the land to the west is crossed by a number of significant road corridors including the A130, A1245 and the A1245, which intersect at Rettendon Turnpike a short distance north east of the settlement at Battlesbridge.

- 2.6 To the south east of the Site the topography rises along the route of Hambro Hill, with existing development at Eastview Drive, Mortimer Road and Ferndale Road occupying the rising ground on the edge of the settlement. East of Hambro Hill the landform continues to rise for a short distance along the route of Hockley Road / High Road which runs along a ridge line, with the landform falling once more to the south east. The mature woodland at Blounts Wood combined with extensive tracks of woodland on the rising ground around the settlement at Hockley, form the back drop in views eastwards from the Site, providing containment to the eastern edge of Rayleigh and separation between the adjoining settlement of Hockley.
- 2.7 To the east of the Site is the Lords Golf and Country Club, with the domed landform of the golf course occupying the intervening landscape separating the settlements at Rayleigh and Hullbridge to the north. East of the golf course the land rises once more towards Church Road and Mill Hill, with the spire at St. Paul's and St. Peters Church a visible landmark on the higher ground east of the road.
- 2.8 Hullbridge Road extends alongside the eastern Site boundary linking between the adjoining settlements at Rayleigh and Hullbridge. The route is typically characterised by tall, mature, treed hedgerows and frequent development, including several residential properties, the commercial buildings at Lubard's Lodge Farm, nursery buildings and glass houses, and the Lords Golf and Country Club.
- 2.9 The settlement at Hullbridge occupies a slightly elevated position within the surrounding landscape, with the land rising up along the route of Lower Road, before falling once more towards the River Roach within the northern part of the town.

National Landscape Character

- 2.10 'The Character Map of England' (a national assessment of landscape character by the Countryside Commission (now the Countryside Agency) and English Nature (now Natural England)) identifies the Site as lying within the Northern Thames Basin (Area 111). The Northern Thames Basin comprises four sub-character areas and the Site is identified as falling within the Essex London Clay Lowlands sub-character area.

2.11 The Character Map describes the London Clay Lowlands as being characterised by flat tracts of traditionally unproductive farmland on heavy clay soils. It states that there is evidence of an ancient planned landscape of long hedgerow boundaries and rectilinear shaped fields created during the Roman period. The area has suffered as a result of Dutch Elm disease which has destroyed many of the once numerous standing trees in the farmed landscape. The document notes that the Essex hills around Langdon, Hockley and Rayleigh provide the only pronounced rise in topography within these lowlands. Although these hills are well wooded they are much urbanised by the development at Rayleigh and Southend.

Local Landscape Character

2.12 Essex & Southend-on-Sea County Council has undertaken a detail landscape character assessment which divides the county into a series of landscape character areas. It identifies the Site as falling within the 'South Essex Coastal Towns' (G3) local character area. The Site lies in the central northern area of this character area, which is described as having large areas of dense urban development and steep south facing escarpments covered by open grassland and large blocks of woodland. Key characteristics include:

- Large areas of dense urban development;
- Rolling hills with steep south and west facing escarpments covered by open grassland or a mix of small woods, pastures and commons;
- Particularly complex network of major transportation routes;
- Narrow bands and broader areas of gently undulating arable farmland with remnant hedgerow pattern separating some of the towns; and
- Pylons dominate farmland in A 130 corridor.

2.13 In terms of settlement pattern, the assessment describes Rayleigh as principally a dormitory town with a more varied urban form and street pattern. Some housing areas are visually prominent wrapping over hillsides and valley sides.

2.14 The Landscape Character Assessment includes an analysis of the landscape condition. It describes the condition of the settlement as mixed, with poor quality intrusive commercial 'shed' developments common within the area. The condition of the woodland and hedgerows are moderate.

2.15 The landscape to the north of the Site lies within the 'Crouch and Roach Farmland' (F2) local character area. The key characteristics include:

- Rolling or gently undulating arable farmland between estuaries.

- Regular fields of variable size and thick or intermittent hedgerow boundaries;
- Frequent views across the farmland to the estuaries from higher ground; and
- Strongly right angled pattern of lanes.

Statutory Landscape Designations

2.16 The Multi Agency Geographic Information for the Countryside Map ('MAGIC') (See **Appendix D**) shows that the Site is not subject to any statutory designations for landscape character or quality. Part of Blounts Wood, approximately 1 kilometre to the east, is designated ancient and semi natural woodland.

Listed Buildings and Conservation Areas

2.17 There are no listed buildings within the Site or in the immediate surrounding area. The centre of Rayleigh is designated as a conservation area, however this is located approximately 1.2km south of the Site and will not be affected by development at the Site.

3.0 LANDSCAPE POLICY CONTEXT

National Planning Policy Framework ('NPPF')

3.1 The Site falls within the Green Belt. Green Belt policy 9 (paragraphs 79 and 80) of the NPPF states that the essential character of Green Belts is their openness, their permanence and their ability to serve the following functions:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Local Policy

3.2 Rochford District Council adopted their Local Development Framework Core Strategy in December 2011. The Site is not covered, nor does it adjoin, any designations for landscape character or quality or nature conservation.

3.3 The Core Strategy reiterates national guidance, formerly contained in PPG2 and now encapsulated in the NPPF, on the purpose and function of the Green Belt. The council does however acknowledge that a small proportion of the Green Belt will need to be reallocated in order to meet the District's housing needs. In Policy GB1 Green Belt Protection the council states that it will allocate the minimum amount of Green Belt land necessary to meet the District's housing and employment needs. In doing so, particular consideration will be given to prevent coalescence of individual settlements in order to preserve their identities.

3.4 The council have produced the Allocations DPD Discussion and Consultation Document. The Site is not included as a potential allocation within this document, however the southern part of the Site was considered as part of the SHLAA. The council's SHLAA did not identify any over-riding landscape constraints to mixed use development however it noted that there could be some impact on the landscape character of the Site and on significant views into and out of the Site.

4.0 SITE DESCRIPTION AND VISIBILITY

Site Description

- 4.1 The Site comprises a series of small, rectangular paddocks which serve Lubbard's Lodge Farm. These are typically divided by a network of post and rail fences, and in part by relatively recent hedgerow planting (circa. 3 – 4 years old). The hedgerow planting extends around the perimeter of the Site setback several metres from the Site boundary in places, retaining a grass strip between the hedgerow and the boundary vegetation proper. There is a floodlit ménage located a short distance east of the farmhouse.

Public Rights of Way

- 4.2 There are two public footpaths which lead east towards Blounts Wood from Hullbridge Road beyond the eastern Site boundary. In addition a public bridleway follows the length of the western, northern and eastern Site boundaries.

Vegetation and Boundary Conditions

- 4.3 There is little vegetation of note contained within the Site, save for the network of recent hedgerow planting. To the south, the boundary with Rawreth Lane is defined by a continuous tall hedgerow, 3 – 4m in height. Similarly, the western and northern boundaries with the adjoining bridleway are defined by a tall double hedgerow, with the offsite hedge containing numerous mature oak trees which provides a degree of enclosure from the surrounding landscape. The eastern boundary with Hullbridge Road, is again marked by a tall hedgerow containing numerous trees at regular intervals.

Tree Preservation Orders

- 4.4 There are no trees within the Site or at the Site boundaries which are covered by any Tree Preservation Orders. There is a single tree at the frontage of the business park at Lubard's Lodge Farm, a short distance from the eastern Site boundary, which is protected.

Topography

- 4.5 The topography of the Site is influenced by its proximity to the gently undulating landscape of the River Crouch valley, which falls gradually to the north and west of the settlement at Rayleigh, rising to form a distinctly more hilly landscape north of the river. In views north and east of the Site, the higher ground around Rettendon can be discerned in the distance.

- 4.6 The topography of the Site falls gradually from a high point at the southern boundary of approximately 30m AOD, falling to approximately 15m AOD along the north eastern boundary with Hullbridge Road. East of the Site, the landform is more complex, rising within the adjoining golf course to a high point of 30AOD, then temporarily falling before rising once more to a high point at Mill Hill of approximately 55AOD. Similarly, south east of the Site the land rises markedly towards the western edge of the settlement at Hockley, with Hockley Road marking the top of a shallow ridgeline which extends eastwards from the edge of Rayleigh. To the south of the Site, the landform rises towards the centre of Rayleigh; whilst north of the Site, the land form rises within the southern and central part of the Hullbridge, to a height of 20AOD, with the landform of the northern part of the settlement falling steadily once more towards the river Roach.

Visibility

- 4.7 The Sites location on the edge of the settlement and the disposition of buildings and mature vegetation to the north and east of the Site, limit opportunities for views from the near distance. The relatively low lying nature of the Site and the undulating nature of the adjoining landscape, particularly to the east, means that there are some middle and long distance views of the Site from higher ground. The key views of the Site are shown on the photographs in **Appendix C**, with the photo-locations shown on the **Location Plan** and **Aerial Photograph** in **Appendices A** and **B** respectively. An assessment of these views is set out below:

South

- 4.8 Opportunities to view the Site from the south are limited by the existing residential edge alongside Rawreth Lane. There are views towards the Site from Rawreth Lane and a short section of the approach along Hullbridge Road, and also from several properties which front onto the road, adjacent to the southern boundary. Views from these receptors however are heavily filtered by the tall hedgerow which extends along the length of the Site boundary (**Photographs 04** and **11**). Views from further west along Rawreth Lane are prevented by existing development to the north of the route (**Photographs 02** and **03**).

East

- 4.9 There are near distance views of the Site from Hullbridge Road, however again these are restricted by the tall treed hedgerow which extends along the boundary (**Photographs 08 and 10**). There are also several properties east of the road which front directly onto the Site and will have more extensive views over the boundary vegetation from first floor windows. To the rear of these, there are a number of dwellings which occupy the rising ground at Eastview Drive, Mortimer Road and Ferndale Road which may have limited, glimpsed views from some first floor rooms (**Photograph 13**).
- 4.10 There are views of the Site from the public right of way which runs alongside the eastern boundary. There are also views into the Site from the grounds of Lubard's Lodge Farm and the adjoining business park.
- 4.11 Further afield the landform rises towards Hockley Road / High Road, and more extensive views are available from higher ground at the edge of the settlement, although views from dwellings within the settlement area are restricted by a combination of landform and existing vegetation, although there will be views from the rear of a few dwellings west of High Road and the grounds at Home Farm. **Photograph 18** illustrates the extensive view from the higher ground to the west of Home Farm. In this view the Site can be clearly perceived in the middle ground, with existing development at Rawreth Lane apparent in the backdrop to views over the northern part of the Site. Further west, the adjoining built up area of Wickford can be perceived in the distance.
- 4.12 Similarly, there are partial views of the northern part of the Site from Church Road to the west of Mill Hill (**Photograph 17**). Views of the southern and central parts of the Site are however prevented by intervening vegetation and the domed landform at Lord's Golf and Country Club.

North

- 4.13 Views of the Site from the approach along Hullbridge Road to the north are prevented by the well vegetated nature of the intervening landscape to the south of the Site. Similarly, the Site cannot be discerned from Hullbridge Road at the edge of the adjoining settlement at Hullbridge (**Photograph 16**).
- 4.14 **Photograph 19** illustrates views from the higher ground at the edge of the settlement at Hullbridge. In views from this vantage point the Site is well contained by the mature vegetated landscape to the south, although the line of poplars along the access to Lubard's Lodge Farm can be discerned in the middle distance. In views towards the Site from this vantage point the existing development at Rayleigh is prominent in the backdrop.

West

- 4.15 There are views of the Site from the public right of way which runs parallel to the western Site boundary; however these tend to be limited to breaks in the dense hedgerow which extends alongside the footpath (**Photograph 05**). Near distance views from the adjoining landscape to the west are limited by the double hedgerow which extends either side of the footpath, and by the network of mature hedgerows which extend alongside the tracks and lanes which criss cross this area.
- 4.16 Beyond this, the land slopes gradually towards the River Crouch. In views from vantage points within the flat landscape of the river valley, the Site is well screened by intervening vegetation (**Photograph 20**).
- 4.17 Long distance views from the higher ground to the north of the River Crouch may be available from public vantage points, however the Site will comprise a small component of the view and again will be well contained by the mature vegetation within the adjoining land to the west, and set against the backdrop of development in Rayleigh.

Landscape Quality

- 4.18 The Site is not covered by any statutory or non-statutory designations for landscape quality.
- 4.19 It comprises a network of undistinguished paddocks, and contains no notable landscape features, save the mature hedgerows at the Site boundaries. It is also affected by the urbanising influences of the adjoining residential area at Rawreth Lane and by the commercial units at Lubard's Lodge Farm. Accordingly, the Site is considered to be only of **medium** to **low** landscape quality and sensitivity.
- 4.20 Similarly, the immediate landscape to the north and west of the Site contains an eclectic mix of landuses, including development, paddocks, small holdings and scrubby grassland, which detract from the unity of this landscape lending it a somewhat untidy / unplanned character. Accordingly, this area is of **medium** to **low** landscape character and sensitivity.
- 4.21 The wider open landscape of the river valley to the north and west of the Site is characterised by its large scale field pattern and intermittent vegetative cover. The passage of a number of high voltage electricity cables and pylons detract from the overall quality of the landscape, which is of **medium** landscape quality and sensitivity. The manicured landscape of the adjoining golf club is also considered to be of **medium** landscape quality.

5.0 ABILITY OF THE SITE TO ACCOMODATE DEVELOPMENT

5.1 The following section assesses the ability of the Site to accommodate development and the key landscape considerations that will need to be taken into account in formulating any development proposals for the Site. It then goes on to consider the implications of releasing the land from the Green Belt, and any consequences resulting from development on the separation between Rayleigh and the adjoining settlement at Hullbridge.

5.2 From our assessment of the Site we have prepared an Development Concept Plan (**Appendix E**) which identifies any potential landscape constraints / enhancements and the most appropriate developable area. The indicative developable areas are concentrated within the southern and central parts of the Site with the northern part of the Site retained as open space. Development in accordance with the principles shown on this plan would permit the release of the land without undermining the principles of the Green Belt or impacting on the gap between Rayleigh and Hullbridge.

5.3 From our initial assessment of the Site we have also identified a number of factors which need to be taken into account when developing the proposals for the Site, these include:

- Retention and enhancement of the majority of trees and hedgerows at the boundaries of the Site;
- Retention of the northern part of the Site free from development;
- Retention and enhancement of existing public footpaths at the perimeter of the Site within or adjacent to green corridors / landscaped strips;
- Sensitively consider the setting of the residential properties at Lubard's Lodge Farm;
- Retention where possible of existing hedgerow network within greenways to provide connectivity across the Site, and to provide a robust landscape framework for the development area;
- Provide an appropriate buffer to the business park at Lubard's Lodge Farm; and
- Retention of the character of Hullbridge Road.

5.4 In the following section a brief commentary is made on the effects of developing the Site against a series of landscape criteria.

Impact on Landscape Features

- 5.5 The majority of the trees and mature hedgerows are located at the perimeter of the Site and are capable of being retained, save for any sections which will be lost to provide access. Any losses would not be significant and should be capable of mitigation. The remaining vegetation principally comprises relatively recent hedgerow planting to the perimeter of the paddocks. Where this planting lies in close proximity to the Site boundaries there is scope to incorporate this into a landscape buffer to the development area. In addition, where possible additional hedgerows can also be retained within green corridors in order to enhance connectivity across the Site and maintain existing wildlife habitat. Notwithstanding this, some removal will be inevitable in order to facilitate the efficient masterplanning of the Site. Despite this, given the age of the existing stock, these losses will be quickly compensated for by areas of new planting within areas of public open space and landscape buffers.

Relationship to the Existing Urban Area

- 5.6 The Site is well related to the existing built up edge of Rayleigh, which extends alongside the southern and part of the eastern Site boundaries. To the north and west of the Site, the immediate landscape of small fields, sporadic development and horsiculture forms a very distinct character area on the edge of the settlement. Although, in terms of character and urban form it falls outside the existing settlement, it does form a definite urban intrusion into the adjoining countryside, separating the Site from the wider landscape of the Roach Valley. East of the Site, lies the manicured landscape of the adjoining golf course, which again provides separation from the undulating, wooded landscape beyond.

Visual Change and Effects

- 5.7 The visual assessment identified that the Site is well contained in near distance views from the immediate locale by virtue of the dense boundary vegetation. The undulating topography of the adjoining landscape, particularly to the east of the Site means that there are opportunities to view the Site from higher ground. A more detailed description of the impact on these key views is set out below.

- 5.8 Views towards the Site from within the built up area of Rayleigh are typically limited to a number of near distance views by existing residential development at Rawreth Lane and Hullbridge Road. There are a number of properties located immediately south and south east of the Site, which will have partial views of development at the Site, however these will be restricted by the tall hedgerows at the Site boundaries. The Development Concept Plan suggests that frontage onto Rawreth Lane and Hullbridge Road is setback behind a landscape strip. Accordingly, any impact on views from these residential dwellings will not be significant.
- 5.9 Similarly, any potential, glimpsed views from residential dwellings on the rising ground at Eastview Drive, Mortimer Road and Ferndale Road will be limited and are not considered to be significant.
- 5.10 Views from Hullbridge Road are restricted by the tall hedgerow at the Site boundary. In views from this receptor the character of the route is affected by its proximity to the built up area of Rayleigh. South of Lubard's Farm development is more conspicuous along the route of the road, and any development at the Site would not impinge significantly on the character of the route. North of Lubard's Farm, the route is relatively free from development for a short section, consistent with the north eastern Site boundary. The Development Concept Plan shows this part of the Site retained as open space, in order to maintain the undeveloped character in views from the road.
- 5.11 There will be more extensive views from the higher ground west of Hockley and at Mill Hill. In these views development within the northern and central parts of the Site will be seen in context, with existing development within Rayleigh forming the backdrop. Accordingly, there will be little impact on the character or quality of these views. Development south of Lubard's Farm will start to encroach on the more open views over the flat landscape of the Roach Valley. To prevent any impact on the character of these views the Development Concept Plan shows the northern part of the Site retained as open space.
- 5.12 The Site is well contained in views from the edge of Hullbridge, although there are limited views of the southern part of the site from higher ground. In these views development at the site would form a small component of the existing development area in Rayleigh.
- 5.13 The site is well contained in views from the wider landscape to the west, such that development will not have any material impact on views from receptors in these locations.

Public Rights of Way

- 5.14 There is an existing public right of way which extends alongside the western, northern and eastern boundaries of the Site. To the north and west the footpath is separated by a dense, tall hedgerow which provides a strong sense of enclosure to the route. To the east the footpath enters the Site and runs parallel to the adjoining Hullbridge Road. In all instances there is scope to provide an enhanced landscape treatment alongside these boundaries, either retaining the route within a green corridor to the east, or providing an improved landscaped edge at the western and northern Site boundaries. Accordingly, subject to an appropriate landscape scheme, although users of the footpath will experience some short term impacts, in the longer term as the landscaping matures there will be some qualitative improvement to the character and quality of the route.

Landscape Quality

- 5.15 As described in Section 4, the Site is of **medium** to **low** landscape quality and is subject to a number of urbanising effects, including the existing residential edge at Rawreth Lane and Hullbridge Road and the commercial buildings at Lubard's Lodge Farm. The majority of the existing vegetation can be accommodated and there are opportunities for significant landscape enhancements, both at the Site boundaries and within areas of public open space. The Site therefore has a good ability to accommodate change.
- 5.16 The visual assessment identified that the Site is typically well contained in middle and long distance views from the surrounding area, and is well related to the surrounding urban or semi-urban land uses. Accordingly, development in accordance with the Development Concept Plan would not appear discordant in views from the wider area and can be accommodated without materially impacting on the character or the setting of the wider landscape.

Impact on the separation between Rayleigh and Hullbridge

- 5.17 Development at the Site will inevitably extend the existing urban envelope of Rayleigh northwards into the existing gap between the two settlements. Despite this, it will not materially impact on the perceived separation between Rayleigh and Hullbridge for the following reasons:
- There is limited inter-visibility between the Site and Hullbridge, and development at the Site will not impact on the character of views from the edge of Hullbridge.

- Hullbridge Road is currently characterised by frequent development along the length of the route, including residential dwellings, the golf course, commercial development at Lubard's Lodge Farm and the nursery buildings. Development at the Site in accordance with the Development Concept Plan will not therefore materially alter the character of the route.
- Development will be located within the southern and central parts of the Site with the northern part retained as open space, maintaining the the open character of Hullbridge Road and the gap at this point.
- Development within the southern and central part of the Site would only extend built form as far as the commercial development at Lubard's Lodge Farm, which effectively marks the existing extent of development along Hullbridge Road at the northern edge of Rayleigh; and only a short distance north of existing residential development at Hullbridge Road.
- Development at the Site would extend built form approximately 500m north of Rawreth Lane, however a gap in excess of 1km would be retained between the settlements.
- The gateway into Hullbridge is marked by the right turn onto Lower Road at the head of Hullbridge Road. The open fields south of Lower Road provide the setting for the approach to the village, and a distinct transition between Hullbridge Road and the arrival at Hulbridge itself. Development at the Site will have no impact on the setting of this approach, nor on the sense of arrival at the settlement.

Impact of releasing the Site from the Green Belt

5.18 If the Site is allocated for development then the Green Belt boundary would need to be amended to reflect the change. The current Green Belt boundary within the vicinity of the Site is contiguous with the settlement edge at Rawreth Lane and a short section of Hullbridge Road adjacent to the south east corner of the Site. The Green Belt washes over the landscape north of Rayleigh as far the adjoining settlement at Hullbridge.

5.19 Whilst the exact location of the revised Green Belt boundary would be a matter for the LPA, in the event the Site came forward, it would be logical to recast the boundary to follow the edge of the expanded development area as far as Lubard's Lodge Farm.

5.20 The NPPF at paragraph 80 identifies the five purposes of Green Belts as:

- to check the unrestricted sprawl of large built-up areas;

- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

5.21 As discussed above there is only limited intervisibility between the Site and Hullbridge and the distances are such that a clear break would be maintained, accordingly development would not materially impact on the separation between the settlements. In addition, the Site is undistinguished in terms of landscape character, and does not currently provide a setting for the adjoining residential edge, which appears quite stark in views from higher ground to the east. In fact, landscaping within the northern part of the Site would provide an improved, robust edge to the settlement.

5.27 In respect of the other purposes, the potential development would represent a planned release of land and as such would not result in encroachment into the countryside. In addition, the Site is separated from the wider landscape by the adjoining mixed, sporadic development to the north and west and by the golf course to the east. In respect of the fourth purpose, development of the Site would not impact on any listed buildings or conservation areas.

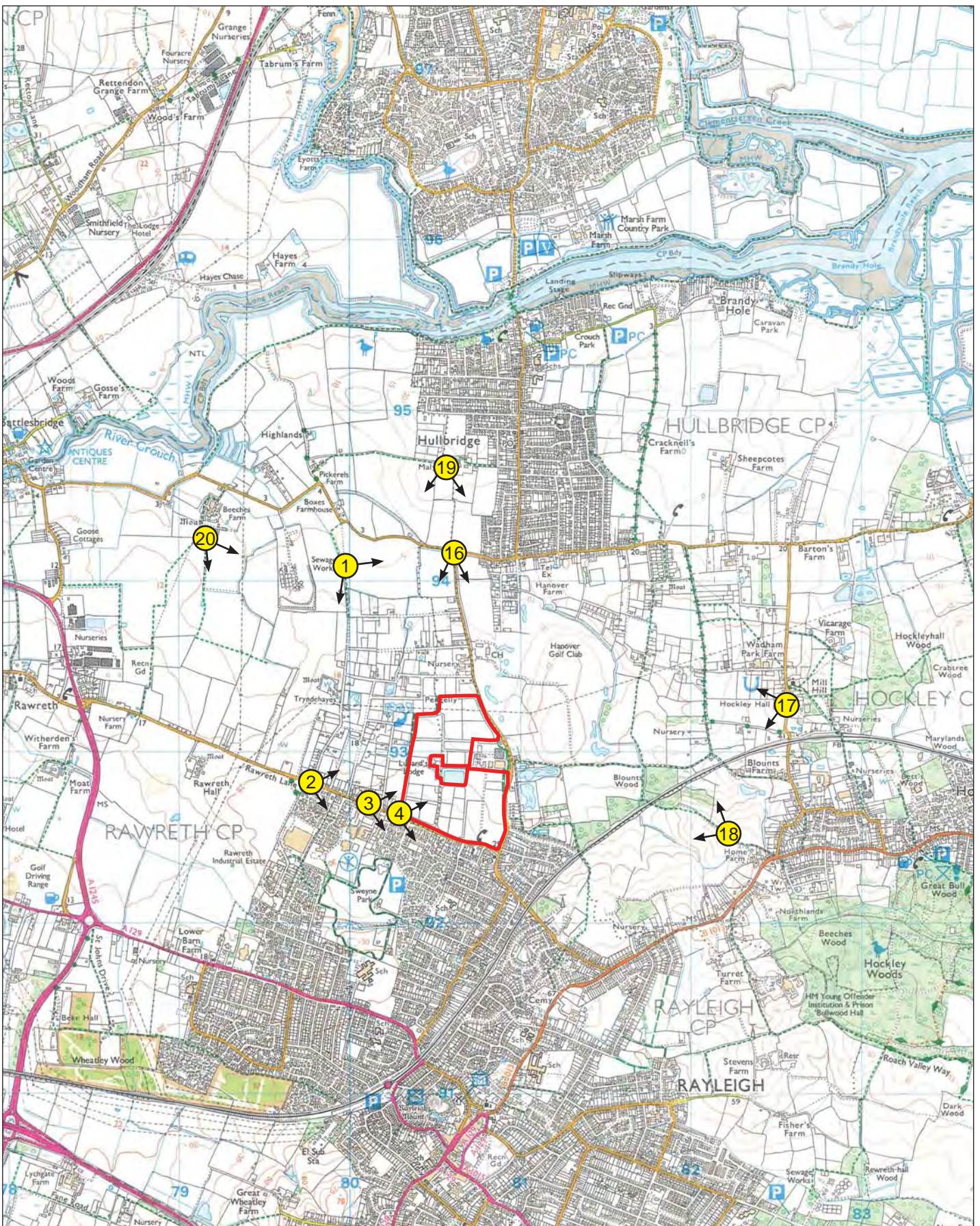
5.28 The Council's Core Strategy acknowledges that a planned release of Green Belt land will be necessary in order to meet the District's housing needs and as a result some green field sites in appropriate locations will need to be developed. For the reasons already given, development on the Site in accordance with the principles shown on the Development Concept Plan contained in this document, shows how housing could be delivered in a sustainable location with no over-riding impacts on the adjoining landscape, nor on the objectives of the Green Belt.

6.0 CONCLUSION


- 6.1 The Site is not covered by any statutory or non-statutory designations for landscape character or quality but does lie within the Green Belt.
- 6.2 The Site is undistinguished in landscape terms and contains little vegetation of note save for the mature hedgerows at the Site boundaries. It is subject to a number of urbanising influences including the commercial development at Lubard's Lodge Farm and development at Rawreth Lane, and is therefore only considered to be of **medium** to **low** landscape quality with a good ability to accommodate development.
- 6.3 The Site is contained from the wider countryside by the adjoining sporadic mix of development and horsiculture to the north and west and by the golf course to the east.
- 6.4 Near distance views of the Site are limited to the immediate locale and filtered by the tall hedgerows at the Site boundary. Long distance views are typically limited to the higher ground to the east and limited views from the edge of Hullbridge, and seen in the context of the adjoining development within Rayleigh.
- 6.5 The Site is a suitable candidate for residential development and subject to the landscape recommendations contained within this document being adopted, the Site is capable of being released for development without giving rise to any material impact on the character or quality of the surrounding landscape or the objectives and purposes of the Green Belt, nor will it have any impact on the perceived separation between Rayleigh and Hullbridge.

Appendix A

Location Plan
CSa/2022/100

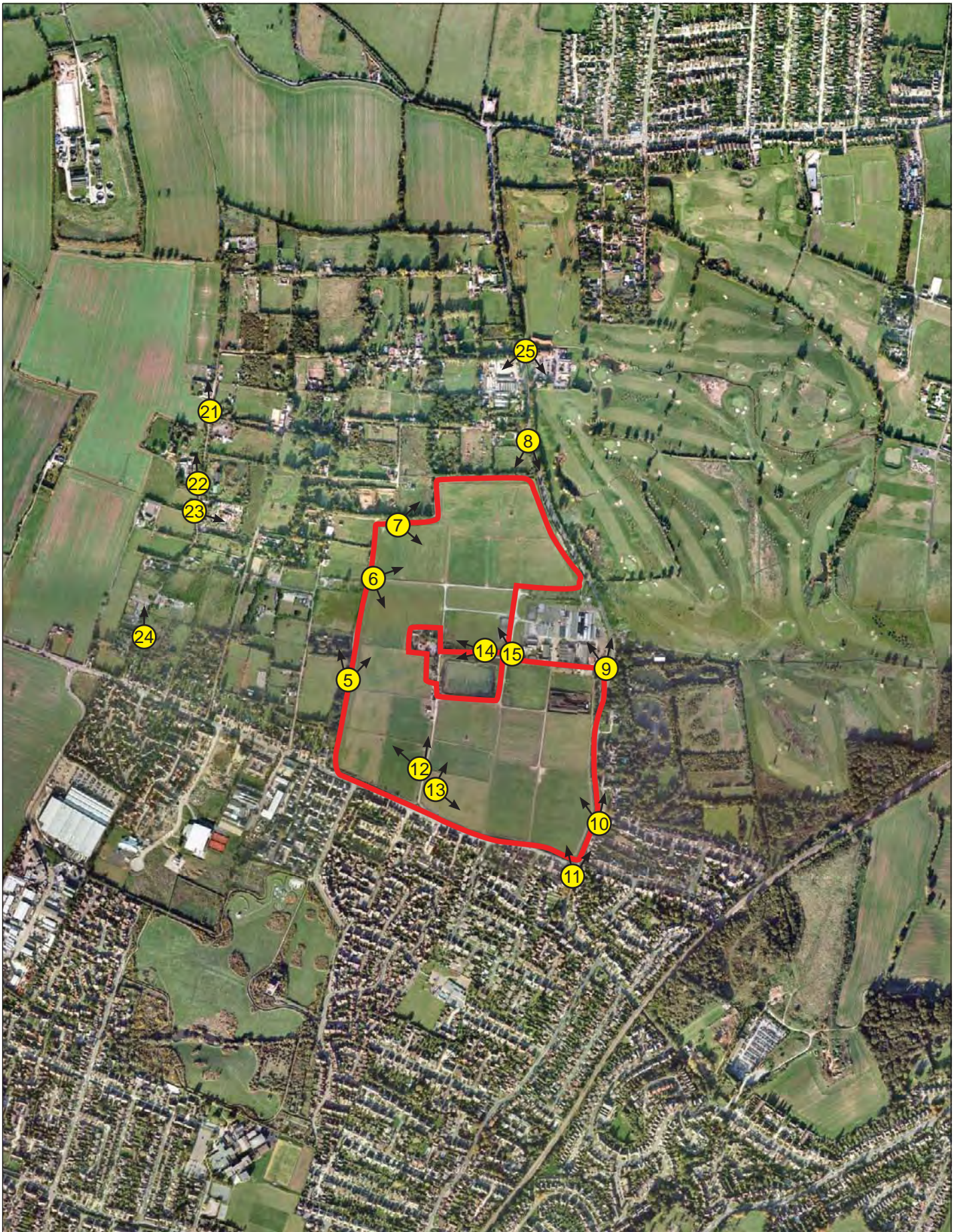


Key
 Site boundary
 Photo Location


 Dixies Barns, High Street, Ashwell, Hertfordshire, SG7 5NT t 01462 743647 f 01462 743648 e ashwell@csaenvironmental.co.uk	Project	Hullbridge Road, Rayleigh	Date	July 2012	Drawing Number	CSa/2022/100
	Title	Location Plan	Scale	Not to scale	Revision	-
	Client	C.E.G.	Drawn	TB	Checked	SG

Appendix B

Aerial Photograph
CSa/2022/101



Key
 Site boundary  Photo Location

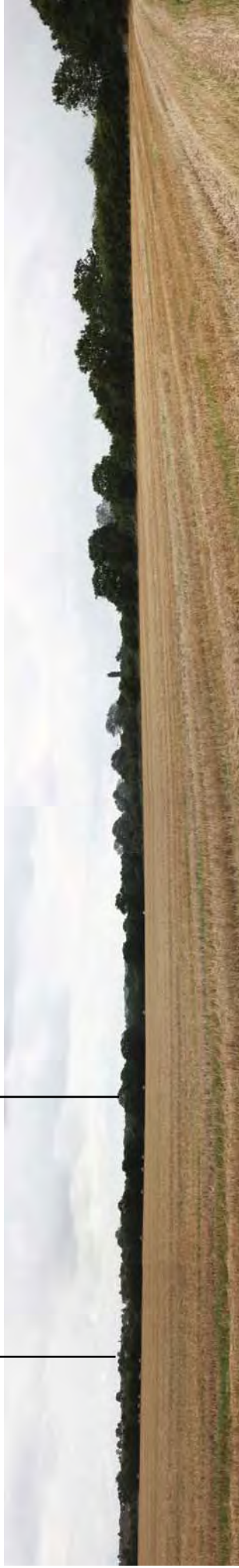
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	Title	Aerial photograph	Scale	Not to scale	Revision	-
	Client	C.E.G.	Drawn	TB	Checked	SG

Appendix C

Photographs
CSa/2022/104

Development in Hullbridge

Vegetation along Hullbridge Road



View south from PROW/leading from Watery Lane

Photograph 01



View along Rawreth Lane

Photograph 02



View along Rawreth Lane from the Health Centre Photograph 03

Southern site boundary



View from Rawreth Lane at south western corner of site Photograph 04

Hedgerow at western site boundary



Photograph 05

View along PROW at western site boundary

Development west of Mill Hill



Photograph 06

View across northern part of site



View along PROW at northern boundary Photograph 07



View from Hullbridge Road to north east of site Photograph 08

Project Hullbridge Road, Rayleigh

Title Photo sheets

Client C.E.G.

Date September 2012

Drawn TB

Checked CA

Drawing Number CSa/2022/104

Revision -



Photograph 09

View of commercial development at Lubard's Lodge Farm

Eastern site boundary



Photograph 10

View from Hulbridge Road from the edge of Rayleigh

Southern site boundary

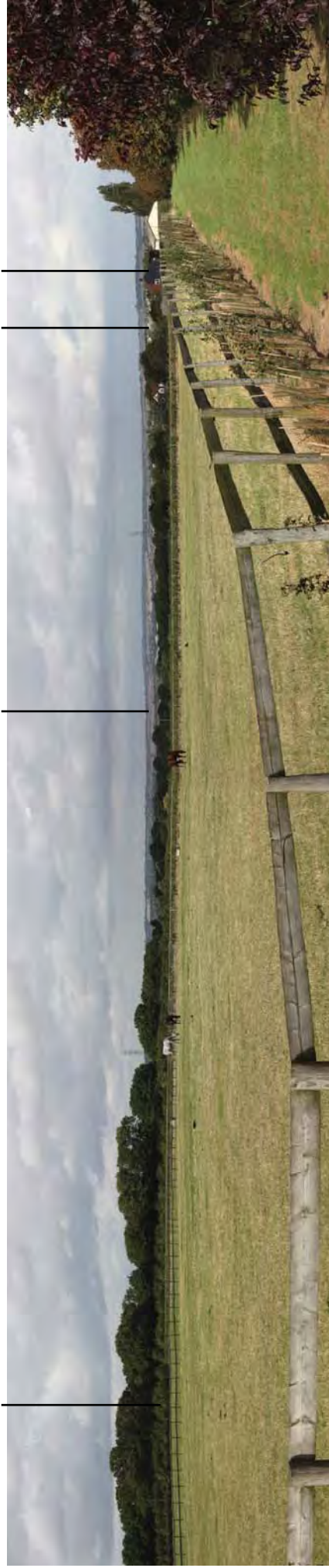


View from junction between Rawreth Lane and Hullbridge Road

Photograph 11

Eastern site boundary

Western site boundary



High ground on north of the River Roach Valley

Development on the edge of Hullbridge

Lubard's Lodge Farm

View across western part of site

Photograph 12



Dixies Barns,
 High Street, Ashwell,
 Hertfordshire, SG7 5NT
 t 01462 743647
 f 01462 743648
 e ashwell@csaenvironmental.co.uk

Project Hullbridge Road, Rayleigh

Title Photo sheets

Client C.E.G.

Date

September 2012

Drawing Number CSa/2022/104

Drawn

TB

Checked CA

Revision

-

Development west of Mill Hill

Existing development east of Hullbridge Road



Photograph 13



Lubard's Lodge Farm Photograph 14

Project Hullbridge Road, Rayleigh

Title Photo sheets

Client C.E.G.

Date September 2012

Drawn TB

Checked CA

Revision -

Drawing Number CSa/2022/104



Paddock and menage at Lubard's Lodge Farm Photograph 15

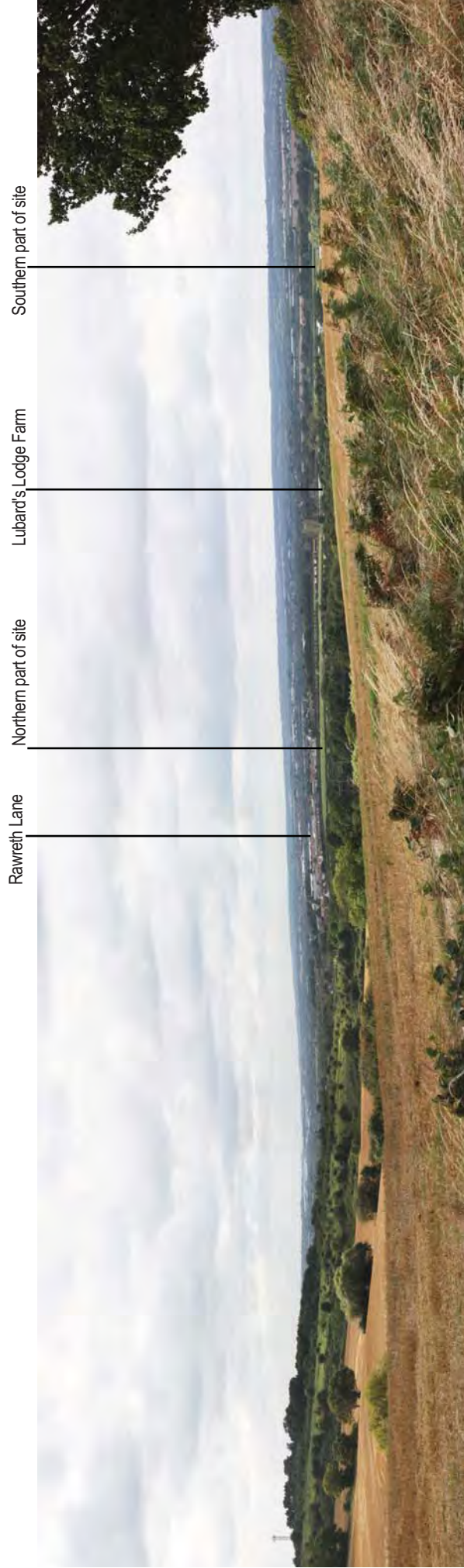


View from edge of Hullbridge at the junction with Lower Road Photograph 16



Photograph 17

View from Church Road west of Mill Hill



Photograph 18

View from PROW west of Home Farm, High Road


Date	September 2012	Drawing Number	CSa/2022/104
Drawn	TB	Checked	CA
		Revision	-



Photograph 19



Photograph 20

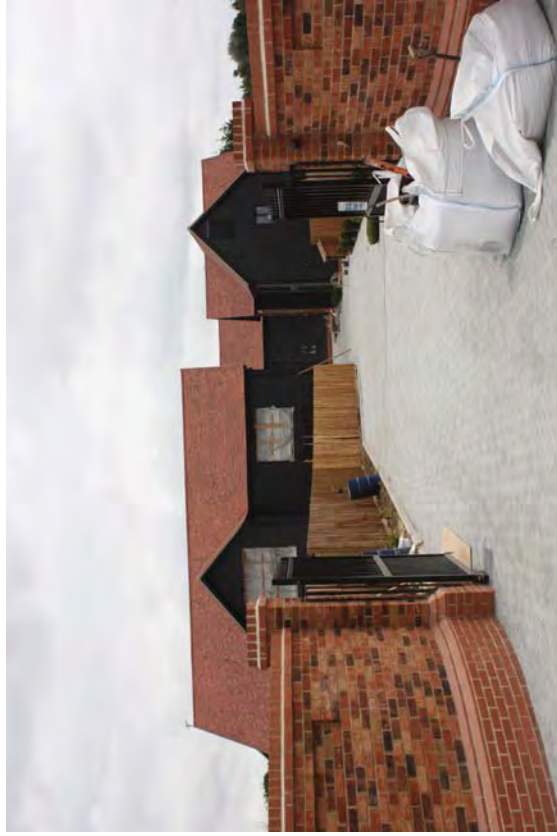
<p>Dixie Barrs, High Street, Ashwell, Hertfordshire, SG7 5NT t 01462 743647 f 01462 743648 e ashwell@csenvironmental.co.uk</p> 	Project	Hullbridge Road, Rayleigh	Date	September 2012	Drawing Number	CSa/2022/104	
	Title	Photo sheets	Drawn	TB	Checked	CA	Revision
Client		C.E.G.					



Development at Trenders Avenue Photograph 21



New development on Trenders Avenue Photograph 22



New Barn development at Trenders Avenue Photograph 23



Development at Trenders Avenue Photograph 24



Lords Golf Club on Hullbridge Road Photograph 25

Project Hullbridge Road, Rayleigh

Title Photo sheets

Client C.E.G.

Date September 2012

Drawn TB

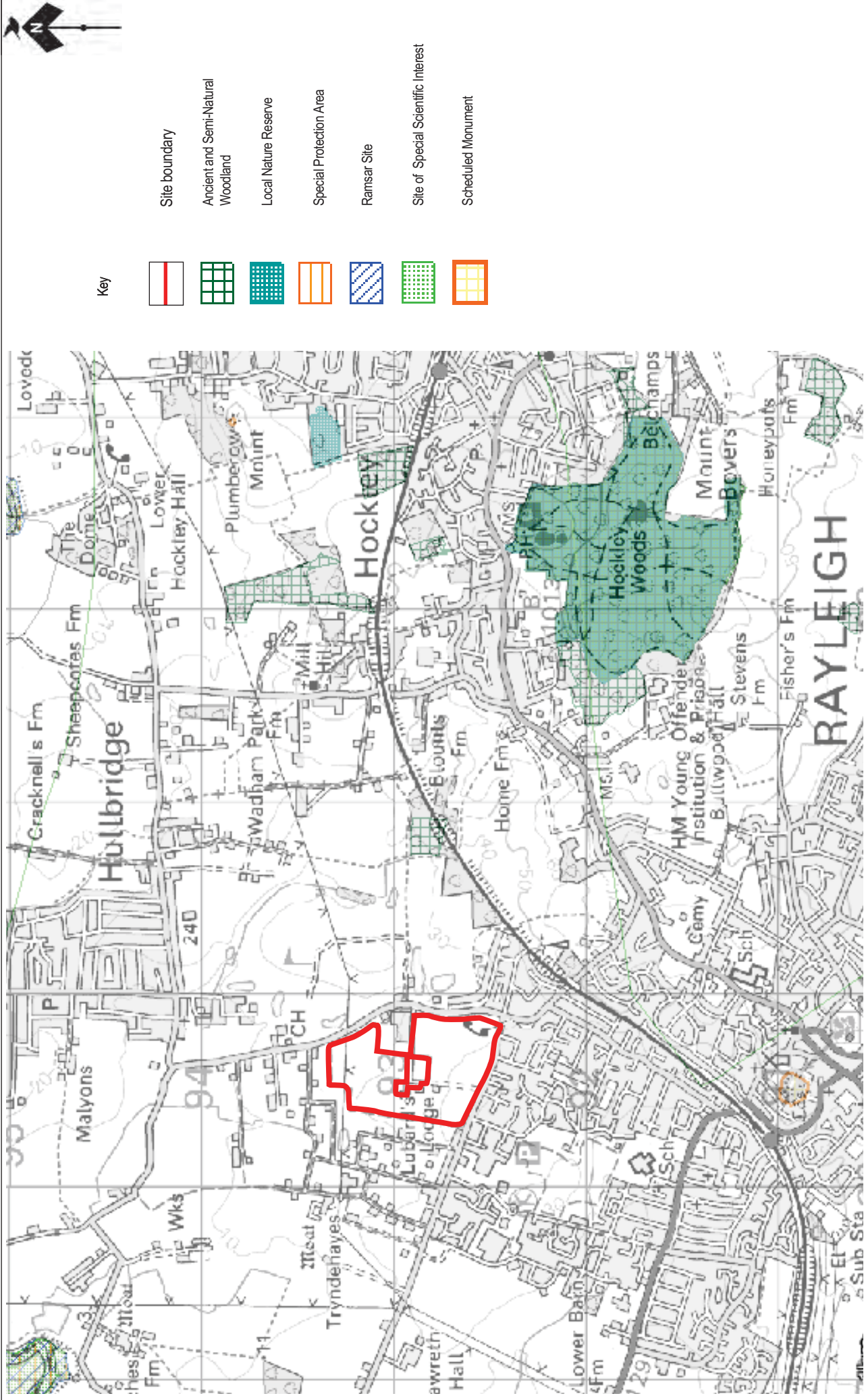
Checked CA

Revision -

Drawing Number CSa/2022/104

Appendix D

Magic Map Extract
CSa/2022/103



Dixies Barrs, High Street, Ashwell, Hertfordshire, SG7 5NT t 01462 743847 f 01462 743648 e ashwell@csseenvironmental.co.uk	Project Hullbridge Road, Rayleigh	Date September 2012	Drawing Number CSar/2022/103
	Title MAGIC Map	Scale Not to Scale	Revision -
Client C.E.G.	Drawn TB	Checked CA	



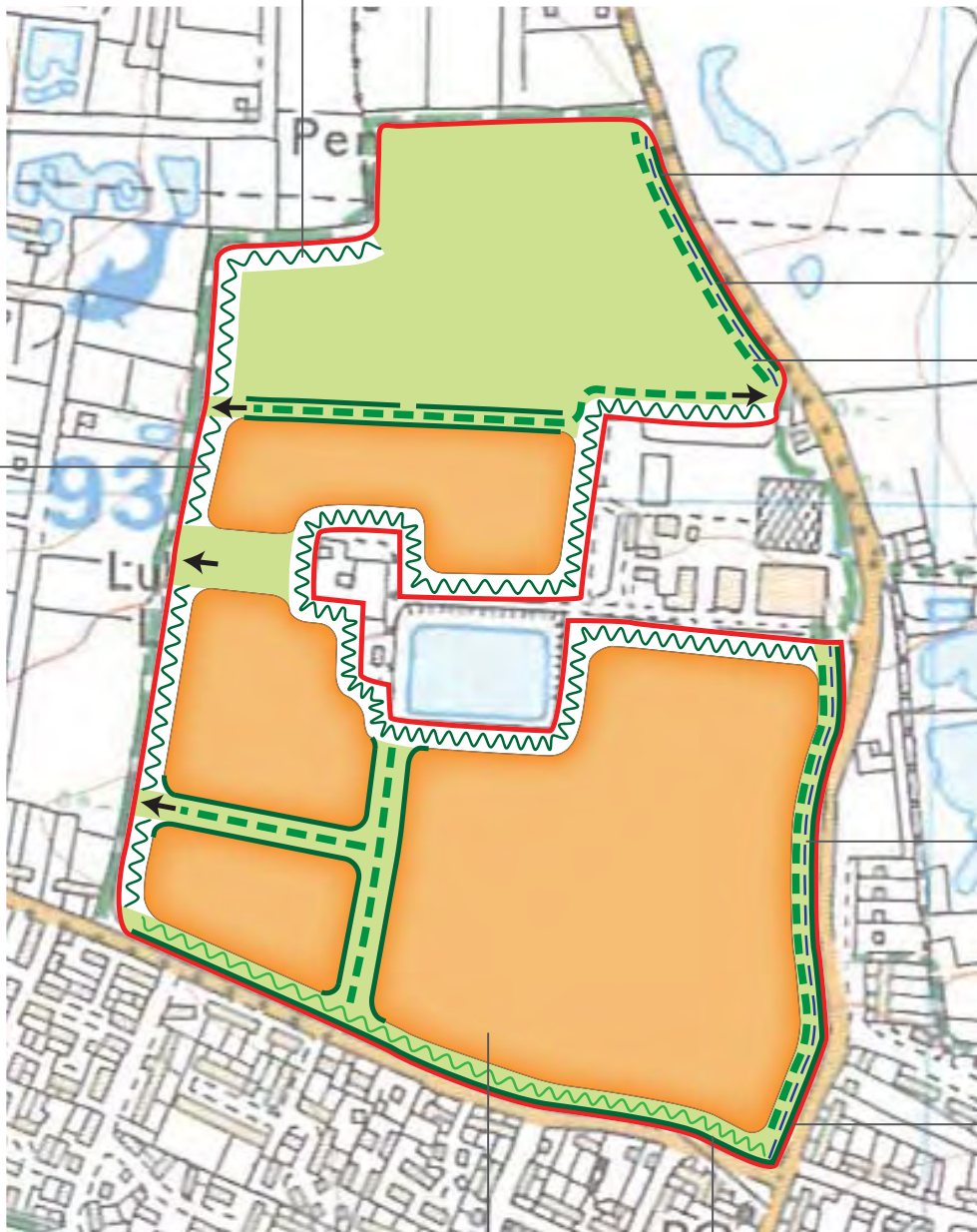
Appendix E

Development Concept Plan
CSa/2022/105

Landscape buffer to public right of way



Landscaping along western boundary to retain soft edge with adjoining footpath



Create enhanced landscape setting to public right of way

Retain character of Hullbridge Road









Retain and reinforce boundary vegetation

Retain public right of way within green corridor

Retain and reinforce boundary vegetation

Housing frontage to Rawreth Lane to be set back behind landscape strip

Retain and reinforce boundary vegetation

-  Site boundary
-  Significant public open space
-  Landscape buffer / landscape strip
-  Green corridors
-  Existing hedgerows
-  Existing public right of way retained within site
-  Pedestrian links
-  Development area

Appendix C

Preliminary Ecological Appraisal (CSa Environmental Planning)



October 2012

Land West of Hullbridge
Road, Rayleigh

Preliminary Ecological Appraisal

Prepared by
CSa Environmental Planning

On behalf of
Commercial Estates Group

Report No: CSa/2022/02

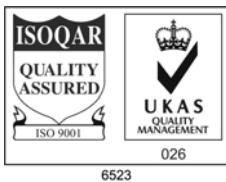
October 2012

Land West of Hullbridge
Road, Rayleigh

Preliminary Ecological Appraisal

Prepared by
CSa Environmental Planning

On behalf of
Commercial Estates Group



	Date	Prepared by	Authorised by	File Ref
First Issue	17.10.12	JCW & SS	AM	CSa/2022/02

Report No: CSa//2022/02

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Appendix A: Development Concept Plan (CSa /2022/105)

Appendix B: Habitats Plan (CSa/2022/106) and Site Photographs

1.0 INTRODUCTION

- 1.1 This report sets out the findings of a Preliminary Ecological Appraisal undertaken at Land West of Hullbridge Road, Rayleigh, Essex (centred at grid reference TQ 8061 9284). The survey was undertaken by CSa Environmental Planning on behalf of Commercial Estates Group to identify potential ecological issues in respect of the potential residential development of the site. This is a preliminary appraisal to highlight potential issues for concept masterplanning and site promotion. Broad recommendations for mitigation and for ecological enhancement measures have been provided where appropriate, however, a more detailed appraisal would be required to inform any future planning submission.
- 1.2 An Initial Landscape and Visual Assessment (report ref. CSa/2022/01) was carried out in September 2012 to assess the suitability of the site for residential development and to inform the Council's emerging Allocations DPD. The Development Concept Plan derived from this initial assessment (Appendix A, Plan CSa/2008/105) has been used as an initial guide to potential development parameters and against which to judge the likely ecological constraints and opportunities.

2.0 METHODOLOGY

Desk Study

- 2.1 Information on statutory wildlife site designations within 5km of the site was obtained online from the Multi-Agency Geographic Information for the Countryside (MAGIC) database. Information on non-statutory wildlife sites within 1km of the Site was obtained from the Essex Wildlife Trust website¹. Records of protected and notable species within 2km of the central site grid reference (i.e. extending at least 1km from the site boundary) was obtained from Essex Wildlife Trust, the county bat recorder for Essex and the National Biodiversity Network (NBN Gateway)². Whilst the absence of a given species from the dataset cannot be taken to represent actual absence, species records can provide a useful indication of the species present within a searched locality.
- 2.2 Natural England guidelines³ suggest that all ponds within 0.5km of a proposed development area should be considered in respect of breeding great crested newt *Triturus cristatus*. Waterbodies within 0.5km from the site boundary were therefore identified using Ordnance Survey mapping and aerial photography.

Extended Phase 1 Habitat Survey

- 2.3 The site was surveyed on 26 September 2012 during generally clear, bright weather conditions, with one exceptionally heavy downpour. The area (red line boundary shown in Appendix A) was walked and notes were made of the flora and fauna observed, with specific attention paid to the potential for protected or notable species to occur. Habitats and features of interest were mapped using standard Phase 1 Habitat survey methodology (JNCC, 2010⁴).

Site Evaluation

- 2.4 The formal evaluation criteria used to assess ecological features are not set out in this short report. However, an initial evaluation of features is provided, in line with the evaluation methodology produced by the Institute of Ecology and Environmental Management (IEEM) as part of their Guidelines for Ecological Impact Assessment 2006⁵.

¹ www.localwildlifesites.org.uk

² National Biodiversity Network (2012). NBN Gateway. Available from: data.nbn.org.uk [Accessed: September & October 2012]

³ English Nature (2001) Great Crested Newt Mitigation Guidelines. Version: August 2001. English Nature, Peterborough

⁴ Joint Nature Conservation Council (2010) Handbook for Phase 1 Habitat Survey – a technique for environmental audit. JNCC, Peterborough

⁵ Institute of Ecology and Environmental Management (2006) Guidelines for Ecological Impact Assessment in the United Kingdom

Constraints

- 2.5 The botanical descriptions within this report are based on a relatively brief survey visit undertaken late in the seasonal window for survey when species, particularly vernal species, may not be visible above ground. Whilst this is unlikely to compromise the objective of broadly categorising the habitat types present, it is possible that some species could be missed.

3.0 SITE DESCRIPTION AND RESULTS

Designated Wildlife Sites

- 3.1 No statutory designated wildlife sites occur on or immediately adjacent to the site. Two internationally designated Ramsar, Special Protection Areas (SPA) and Special Areas of Conservation (SAC) occur within the surrounding 5km. These, plus two further nationally designated Sites of Special Scientific Interest (SSSI) are summarised in Table 1.

Table 1. Statutory designated wildlife sites within 5km of the site listed in order of distance

Designated site	Distance and direction from site boundary	Description
Hockley Woods SSSI / LNR	1.8km SE	Extensive area of ancient coppice woods. County importance for its extent and flora, such as the decreasing water-violet <i>Hottonia palustris</i> . The population of sessile oak <i>Quercus petraea</i> is thought to be the largest in eastern England.
Crouch & Roach Estuaries Ramsar / SPA / SSSI	1.9km NW	Intertidal habitats, saltmarsh and grazing marsh of national and international importance for some birds, such as dark-bellied brent geese <i>Branta bernicla</i> , as well as for plant and invertebrates such as the nationally scarce Roesel's bush-cricket <i>Metrioptera roeselii</i> and ground lackey moth <i>Malacosoma castrensis</i> . The site boundaries overlap with those of the SAC (see below).
Essex Estuaries SAC	1.9km N	Primary features for designation include the following Annex I habitats: estuaries, mudflats and sandflats not covered by the sea at low tide, Atlantic salt meadows and <i>Spartina</i> swards. The site boundaries overlap with those of the SPA / SSS (see above).
Thundersley Great Common SSSI	3km S	Of county importance for its range of acidic grassland and wet and dry heath communities. Contains locally uncommon plants such several sedges (e.g. green-ribbed sedge <i>Carex binervis</i>).
Garrold's Meadow SSSI	3.7km SE	Sloping, unimproved grassland resulting in a diverse plant community. Several species of importance in Essex are recorded, such as eyebright <i>Euphrasia nemorosa</i> and yellow-rattle <i>Rhinanthus minor</i> .
Great Wood & Dodd's Grove SSSI	4.4km S	Large area of ancient coppiced oak woodland of county importance for its extent and the last known stronghold of the rare heath fritillary butterfly <i>Melitaea athalia</i> .

- 3.2 Five statutory designated Local Nature Reserves (LNR) occur within 5km, including Hockley Woods SSSI / LNR (as listed in Table 1), Kendall Park LNR, 2km north, Marylands LNR, 2.8km south east, Fenn Washland LNR, 2.9km north and Belfairs LNR, 4.4km south. Belfairs LNR is a semi-ancient woodland supporting heath fritillary butterfly and dormice *Muscardinus avellenarius*. No information regarding the remaining three designations could be obtained.
- 3.3 Two non-statutory designated Local Wildlife Sites (LWS) occur within 1km of the site boundary:
- Hullbridge Road Meadow LWS is a grazed lowland meadow (UK BAP habitat), c.350m to the north, known to support green-winged orchid *Anacamptis morio*, an Essex Red Data species.
 - Blounts Wood LWS is an area of ancient mixed deciduous (ash *Fraxinus excelsior* - hazel *Corylus avellana*) woodland (also UK BAP) and lies c.800m east of the site. The area is rich in ground flora and supports a population of wood ants *Formica* sp.

General Site Description

- 3.4 The c.36ha site is bordered to the east by Hullbridge Road and to the south by Rawreth Lane. Beyond the roads, residential development extends to the south and south east, with Hanover Golf Course to the north east. To the north and west the site is bordered by areas of pasture, paddocks, and more formal garden lawns, which are interspersed by hedgerows and trees.
- 3.5 The site itself comprises a series of horse grazed fields, divided by a network of hedgerows and paths. A small orchard lies at the centre of the site, adjacent to private residential land referred to as Lubard's Lodge. Well-established hedgerows and scattered trees extend around the site boundary, and a ditch, dry for the majority of its length, extends around much of the perimeter. The site envelopes a central reservoir and private residential properties. A light industrial park lies to the east of the site off Hullbridge Road.

Habitats

- 3.6 Habitats present on site are described below and illustrated in the Habitats Plan and site photographs (Appendix B). Overall, the habitats present on site are considered to be of value at the Site level.

Notable Flora Records

- 3.7 Essex Wildlife Trust has provided four notable plant records from within the 2km search area:

- Cornflower *Centaurea cyanus* (UK BAP) is recorded at Kendal Park, c.2km north.
- Deptford pink *Dianthus armeria* (UK BAP), a species of disturbed sites, was recorded in a garden c.1.4km north east in Hullbridge, in 2004.
- Grape-hyacinth *Muscari neglectum* (UK BAP) in 1km grid square TQ8094 with a nearest point 600m north of the site.
- Slender hare's-ear *Bupleurum tenuissimum* occurs within the 1km grid square TQ8195, which lies c.1.6km north east of the site at its closest point. This is a salt-loving species, likely associated with grassy or marshy habitat around the River Crouch.

Grassland Habitats

- 3.8 The majority of the site comprises close-grazed pasture for horses, divided into a series of smaller fields or paddocks. The sward typically includes a reasonable diversity of common and widespread grasses and herbs including perennial rye-grass *Lolium perenne*, meadow-grass *Poa* sp. couch *Elytrigia repens* and a bent grass *Agrostis* sp, with white clover *Trifolium repens*, common cat's-ear *Hypochaeris radicata*, broad-leaved plantain *Plantago major*, bristly oxtongue *Helminthotheca echioides* and dandelion *Taraxacum officinale* agg. At the periphery, Timothy grass *Phleum pratense*, a barley *Hordeum* sp and an oat-grass *Trisetum* sp. were also recorded with prickly sow-thistle *Sonchus asper*, scentless mayweed *Triplospermum inodorum*, wild carrot *Daucus carota* and creeping thistle *Cirsium arvense*.
- 3.9 Outside of the enclosed paddocks, a belt of improved grassland, c.20m wide, extends along the west, north and east (north of the light industrial park) boundaries, providing an area for exercising horses. In the north west corner of the site, this belt is pinched to a narrow path by a mound of rubble (c.3m² x 1.5m high) and an elongated mound of earth vegetated with a rough grassland sward (>15m x >3m in area and 1.5m high). Ungrazed, the tall tussocky sward includes cock's-foot *Dactylis glomerata*, perennial rye-grass, false-oat grass *Arrhenatherum elatius* and a barley, with bristly oxtongue, mugwort *Artemisia vulgare*, teasel *Dipthascus fullonum*, creeping thistle, common mallow *Malva sylvestris*, woundwort *Stachys* sp, hogweed *Heracleum sphondylium*, broad-leaved dock *Rumex obtusifolius* and a willowherb *Epilobium* sp. The mounds and brash piles are of particular note as suitable habitat for reptiles and amphibians (see below). An ungrazed improved sward also extends below the orchard at the centre of the site. A small vegetated earth mound (c.3m², 1m high) and a brash pile were also recorded here.
- 3.10 Close mown amenity grassland lawns border the western end of the light industrial site and extend across the reservoir bund.

Hedgerows, Ditches and Trees

- 3.11 The external site boundary is marked by a tall (at least 2m high, 1m wide) intact hedgerow with, for the majority of its length, a ditch at the base. A species-rich section extends along the eastern site boundary, north of the industrial park. Hawthorn *Crataegus monogyna*, field maple *Acer campestre* and blackthorn *Prunus spinosa* are abundant, with hazel *Corylus avellana*, pedunculate oak *Quercus robur*, ash *Fraxinus excelsior*, guelder rose *Viburnum opulus* and dogwood *Cornus sanguinea* and elm *Ulmus* sp. also present. Infill planting has been carried out to fill the few gaps present. Climbers recorded include bittersweet *Solanum dulcamara*, ivy *Hedera helix* and bramble *Rubus fruticosus* agg. Associated ground flora along the base of the hedgerows is limited. Scattered standards along its length included ash, field maple, hawthorn and large specimen hazel coppice stools.
- 3.12 South of industrial park, the eastern boundary comprises a species-poor intact hedgerow, the central stretch of which includes oak standards along the road. A wet ditch, the only one on site holding water at the time of survey, ran along the base of this hedgerow. The water depth was typically <5cm, gently flowing over a substrate of pebble and silt. In-channel vegetation recorded at rare occurrence included fool's water-cress *Apium nodiflorum*, pendulous sedge *Carex pendula* and a horsetail *Equisetum* sp, all of which were flailed short at time of survey.
- 3.13 The northern boundary includes a line of broad-leaved trees, mostly pedunculate oak, along the hedgerow. This was classed as species-poor being dominated by hawthorn and blackthorn. A wide, dry ditch extends along the hedgerow from the north east corner of the site, vegetated with a sward which is broadly commensurate with adjacent improved grassland (close mown at time of survey <5cm height). No true marginal or aquatic species were recorded. The ditch continues around the western boundary, becoming increasingly shallow, alongside the species-poor, generally intact hedgerow with scattered broad-leaved trees as mapped.
- 3.14 The southern boundary hedgerow is over 3m high and 2m wide. Unmanaged this is gradually encroaching to the grassland path alongside.
- 3.15 A public footpath extends around the entire site periphery and is separated from the c.20m wide belt for exercising horses that runs along the west, north and east boundaries, by a species-poor hedgerow over 3m high. This offers a continuous canopy over considerable distance but is not species-rich. It is dominated by hawthorn, field maple, with abundant blackthorn.
- 3.16 Hedgerows also divide the paddocks and the network of paths across the interior of the site (paths comprise improved grassland paths unless otherwise mapped as hard standing). In general, the hedgerows across the north of the site are longer established than those to the south. The majority of hedgerows

include an average of 3-5 species but have been mapped as species-poor given the overall abundance of hawthorn and blackthorn. Across the site, additional hedgerows species include field maple, hazel, ash, oak, elder *Sambucus nigra* and spindle *Euonymus europaeus*. Fence lines are mapped only where these are not accompanied by hedgerow planting.

- 3.17 An avenue of broad-leaved trees extends along the east-west drive between Lubard's Lodge and Hullbridge Road. This comprises a mixture of horse chestnut *Aesculus hippocastanum*, lime *Tilia* sp, Italian alder *Alnus cordata*, ash, copper beech *Fagus sylvatica*, with hawthorn specimens at the base. An avenue of establishing horse chestnut trees (4-5m high) also extends along the north-south drive from Rawreth Lane. A line of mature Lombardy poplar *Populus nigra 'Italica'* runs along the southern edge of the reservoir.
- 3.18 An orchard of various fruit trees lies at the centre of the site, north east of Lubard's Lodge. This does not appear to be under intense active management, with rough grassland sward and log piles below (as described above). A second area of orchard lies to the west, beyond the red line boundary in private ownership.

Standing Water

- 3.19 No standing water occurs on site.
- 3.20 A single pond lies at the north west corner of the light industrial park less than 10m from the red line boundary. This is almost entirely vegetated with bulrush *Typha latifolia*. Amongst the vegetation, the water depth was estimated be at least 10cm deep. The steep earth banks were vegetated by grasses and occasional tall ruderal herbs, broadly commensurate with the surrounding improved sward.
- 3.21 A reservoir enclosed within a tall bund lies outside the red line boundary at the centre of this land area next to Lubard's Lodge. The reservoir is fringed by rush *Juncus* spp. and common reed *Phragmites australis* at margins, with various willows *Salix* spp. and hawthorn scrub on the banks. Mats of water-lily *Nuphar* sp. were recorded close to the west bank.

Built Structures and Hardstanding

- 3.22 A single building was recorded within the red line boundary, located within the maintenance yard, south of the light industrial park. Viewed from outside the yard, this was seen to be a large modern corrugated metal storage barn.
- 3.23 Hardstanding was recorded across the maintenance yard, and along a number of 'finished' drives and paths.

Bats

- 3.24 A total of 13 bat records were provided by the county recorder for the 2km search area, comprising common pipistrelle *Pipistrellus pipistrellus*, brown long-eared *Plecotus auritus* and serotine bats *Eptesicus serotinus* as well as three records for unidentified pipistrelle species. Most records occur from the area of Rayleigh, to the south, and areas to the east:
- The nearest record is for brown long-eared bat, c.400m south, from 2002. Three further records exist for the species between 1.1km and 1.6km south east and east, two relating to roost sites from 1993 and 2011.
 - Five records for common pipistrelle were provided, the nearest being c.650m south west of the site. The others range from 1km to 1.6km to the north, east and south, all detailing foraging individuals.
 - An unidentified pipistrelle roost was recorded in a church c.1.2km east in 1992, with two further records c.930m south and 2.3km south east.
 - A serotine record from 2005 lies c.730m south of the site. The record details an individual recovered from a house indicating a probable roost site.
- 3.25 Roosting opportunities in and around the site appear to be relatively limited. Trees within the boundary hedgerows and tree lines may offer features suitable to roosting bats, such as split limbs, dead wood and loose bark. The modern barn within the maintenance yard appeared to be of low suitability to bats. The residential properties located off site in the vicinity of Lubard's Lodge may offer further opportunities, although these were not inspected at close distance. The more established hedgerows, associated trees and tree lines offer foraging and commuting habitat to bats, and form part of a wider network of habitat suitable to bats across the landscape, particularly to the north and west.

Other Mammals

- 3.26 The following records of terrestrial and riparian mammals were identified in the desk study:
- Water vole *Arvicola amphibius* – the closest records are from Beeches Brook, the closest of which is c.1.4km north west (2010)
 - Badger *Meles meles* – 17 records dating back to 1990, the nearest of which occur c.0.5km south east and north of the site, with the remainder distributed mainly around the area of Rayleigh to the south and south east.
 - Hedgehog *Erinaceus europaeus* (UK BAP) – ten records including one referring to the south eastern corner of the site, dated from 1994. The remainder generally occur within residential areas to the south and east of the site (nearest c.50m south, dated 1995).
 - Harvest mouse *Micromys minutus* (UK BAP) – a single record c.1.5km north east from 1999.

- 3.27 The aquatic habitats on site, a single ephemeral pond and a section of wet ditch in the south east of the site, are not suitable for riparian mammals, such as water vole.
- 3.28 No signs of any badger setts were incidentally observed during the survey but it is possible that badgers may forage or move through the site as part of a more extensive range.
- 3.29 The more established hedgerows and, all be it relatively isolated, areas of taller grassland sward provide suitable habitat for the shelter, foraging and dispersal of small mammals, such as hedgehog. No extensive areas of grassland with good habitat suitability such that may be suitable for harvest mouse were recorded during the survey.

Birds

- 3.30 Hedgerows and trees around the site provide nesting opportunities for a range of bird species associated with these habitat types. The close-grazed pasture is considered to be of relatively limited value for foraging and unsuitable for ground nesting species.

Amphibians

- 3.31 Great crested newt *Triturus cristatus* (GCN) records exist for two sites within 2km of the site boundary. The nearest site is c.1.3km south west at Rawreth Grange Villa where six records exist from 2004. The second site is a breeding pond located c.1.6km south of the site at Rayleigh Mount where GCN eggs were recorded in 2005.
- 3.32 Numerous waterbodies were identified within 0.5km of the site as part of the desk study (listed below in order of distance). Of these waterbodies, those stocked with fish are unlikely to support viable populations of GCN. Hullbridge Road is unlikely to pose a complete barrier to movement of roaming newts but is a factor to be considered in the likelihood of species migration between the site and those waterbodies to the east.
- Large reservoir located off site but enveloped by the red line boundary, within c.10m;
 - Fishing lakes flanking McCalmont Drive (an additional lake created east of those mapped, c.10m beyond the northern site boundary was recorded during the field survey of September 2012), c.10m north west;
 - Pond and associated drain east of Hooley Drive, c.10m west;
 - Fishing lakes south of Blounts Wood Road (path), c.65m east south east;
 - Lakes and Ponds at Hanover Golf Club, c.65m north east at the closest point, beyond Hullbridge Road;

- Pond south of Montefiore Drive, c.175m north;
 - Pond west of Hooley Drive (shown only on MAGIC), c.175m west.
 - Two woodland ponds located c.200m south east;
 - Pond east of Cheshunt Drive, >350m west;
 - Pond and lakes east of Trenders Avenue >350m west;
 - Pond south of Vanderbilt Drive, >450m north;
 - Pond and lakes west of Trenders Avenue >475m west;
- 3.33 The single pond observed during the survey, located 10m off-site at the north west corner of the light industrial park is dominated by bulrush, but could provide opportunities for breeding GCN. Whilst the habitats surrounding the pond are not considered optimal to GCN, nor would they pose a barrier to movement of the species.
- 3.34 The close-grazed sward which extends across the majority of the site is of limited value to amphibians. Vegetated mounds in the north of the site offer opportunities for shelter and hibernation, as do some of the more established hedgerows which have associated areas of taller sward grassland, all be these of limited extent.

Reptiles

- 3.35 No recent records for reptile species were identified in the desk study. The NBN Gateway contains historic records (1980 and earlier) for slow worm *Anguis fragilis*, grass snake *Natrix natrix*, adder *Vipera berus* and common lizard *Zootoca vivipara* in the wider area.
- 3.36 As outlined for amphibians above, the close-grazed sward which extends across the majority of the site is of limited value to reptiles, although features such as the vegetated mounds in the north west of the site and in the orchard offer opportunities for shelter. The suitability of such features needs to take into consideration connectivity with other areas of habitat such that these could together support viable population(s). Overall, habitat suitability for reptiles is considered to be low and any population present is likely to be relatively small.

Invertebrates

- 3.37 Essex Wildlife Trust has provided two records for the heath fritillary (a UK BAP species is associated with heathland and rich grassland) at Hockley Woods, c.1.7km east.
- 3.38 Dead and decaying wood on site was limited to occasional features associated with scattered broad-leaved trees at the periphery. The close-grazed pasture which extends across the majority of the site is not considered to be of

significant value to invertebrates. Areas of taller sward grassland and the more established species diverse hedgerows may support a range of invertebrates.

4.0 DISCUSSION AND RECOMMENDATIONS

- 4.1 This section sets out potential constraints and opportunities likely to be associated with residential development at the site, taking account of the Development Concept Plan (Appendix A). Broad recommendations for avoidance of ecological impacts are provided as well as opportunities for enhancement, which largely focus on the creation of a more varied semi-natural habitat mosaic through the site as part of the open space.
- 4.2 A detailed Ecological Assessment and impact assessment should be undertaken to inform any future planning application, including an up to date search for biological records in the local area and an extended Phase 1 Habitat survey of the site and all appropriate detailed (Phase 2) surveys.

Potential Impacts and Recommendations

Designated Wildlife Sites

- 4.3 Eleven statutory designated sites occur within 5km of the site, the closest of which lies 1.8km south east, and two non-statutory sites occur within 1km, the closest of which lies 350m north. No direct impacts on these designated sites are anticipated as a result of proposed development at the site. Potential indirect impacts relate to increased recreational pressure, particularly on the SPA and SAC sites where both land- and water-based recreational pressures are relevant. Any future development will need to accommodate both existing and future recreation demands. This should be achieved through provision of green space on-site but additional capacity off-site may also be appropriate, and the requirement of this will be explored in detail as any development proposal is taken forward. It is recommended that consultation with the Local Planning Authority to investigate the requirements for mitigation be carried out at an early stage.
- 4.4 The Development Concept Plan includes areas of public open space across the north of the site and along some of the existing field boundaries, which extend between proposed development parcels. The footpath around the external boundaries is retained, with additional landscape screening to the north and west (across part of the grassland belt currently used for exercising horses), the south, and around the internal boundaries (bordering private residential properties at Lubard's Lodge, the reservoir and light industrial park). As any future scheme design within each of the development parcels evolves, it is anticipated to incorporate green infrastructure such as SUDS, greens and play space as well as vegetated landscaping. Sensitive design of the green space, across both the public open space and the development

parcels, will be required to optimise the recreation and wildlife functions, as described under 'Opportunities for Ecological enhancement' below.

Habitats and Flora

- 4.5 Native trees and hedgerows in and around the site offer screening and habitat connectivity, as well as holding some ecological value in themselves. The more established hedgerows include those at the perimeter, which include a section which is species-rich and several sections with native broad-leaved trees. The perimeter hedgerows have been incorporated into areas of landscaping and/or green corridor within the Concept Design Plan and as such it is anticipated that these will be retained. Trees, such as the line of mature specimens along the northern boundary, should be protected during works to in accordance with BS5387:2012. Opportunities to extend the area, species richness and associated ground flora of retained hedgerows are set out under 'Opportunities for Ecological enhancement' below.
- 4.6 The orchard at the centre of the site also offers opportunity to marry the benefits of wildlife and community recreation, although it is not currently considered to be of significant ecological value. As such it is recommended that orchard planting be incorporated into the proposed scheme as enhancement, or where the existing cannot be retained as, at least in part, compensation.
- 4.7 The vegetated earth mound in the north west of the site contributes to the variety of the existing habitat mosaic, with particular benefit to reptiles. It is recommended that this feature, or where this is not possible similar replacement feature(s) are incorporated into the proposed green space at appropriate locations with similarly good habitat connectivity. These would aim to offer variety in the microtopography and sward structure to accommodate a greater range of invertebrates, as well as frost- and flood-free hibernacula for reptiles (see below).

Recommendations for further survey

- 4.8 An assessment of hedgerows across the site against the ecological criteria of the Hedgerows Regulations 1997 should be carried out to determine if any of these would be considered 'important' under the Regulations. Where present, important hedgerows should be given particular consideration for retention and protection within any future development proposal.

Bats

- 4.9 British bats and their roosts are protected under the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2010.
- 4.10 The field boundaries are likely to provide foraging and dispersal opportunities for bats, and some of the standard trees within the boundary hedgerows and

tree lines may support potential roost features. These form the features recommended for retention. Whilst it is anticipated that future development will retain the majority of such habitat within any scheme design, potential impacts include localised direct habitat loss, physical severance of flight lines and indirect impacts of lighting.

Recommendations for further survey

- 4.11 Further bat survey work is required to determine what species of bat occur and the level of activity on site. Survey is likely to include daytime bat inspection of trees (not seasonally constrained but greater visibility is achieved when trees are out of leaf) and some bat transect survey work will be required including the deployment of static bat detectors along key hedgerows between April and September (BCT, 2012⁶) to identify any key bat flight lines and inform future development proposals.

Badgers

- 4.12 No evidence of badger sett activity has been seen at this site but badgers are likely to be active across this area. Badgers and their setts are protected under the Protection of Badgers Act 1992.

Recommendations for further survey

- 4.13 Given the protection afforded to badgers and their setts it would be sensible to recheck the site for any new evidence of badger activity prior to any application.

Birds

- 4.14 Birds and their nests are protected by the Wildlife and Countryside Act 1981 (as amended).
- 4.15 Hedgerows and trees on site offer habitat suitable for nesting birds, and it is noted that a large proportion of these, including those at the periphery, are likely to be retained. However, where the clearance of habitat suitable for nesting is necessary to facilitate development, this should be programmed to avoid the period between March and August (inclusive) when nesting birds are most likely to be present.

Great Crested Newt

- 4.16 GCN and their habitats are protected under the Wildlife and Countryside Act 1981 (as amended) and The Conservation of Habitats and Species Regulations 2010.
- 4.17 No standing water was recorded on site. However, numerous waterbodies were identified within 0.5km of the site which may support GCN which use suitable habitats on site during the terrestrial phase of their life cycle. In

general terms, suitable terrestrial habitats primarily occur across peripheral areas in the northern half of the site.

Recommendations for further survey

- 4.18 An initial Habitat Suitability Index (HSI)⁷ assessment (not seasonally constrained) of the on and off site waterbodies is recommended to determine the suitability of these to support breeding GCN. Any waterbodies identified to be suitable should be subject to a standard presence/probable absence survey between mid March and mid June (English Nature, 2000⁸) to ascertain whether these ponds support GCN, and if present, population size class survey. The survey findings will be used to inform the scheme design and where appropriate, EPS licensing requirements will be reviewed.

Reptiles

- 4.19 Common lizard, slow worm, grass snake and adder are afforded protection against intentional killing and injury under Wildlife and Countryside Act 1981 (as amended).
- 4.20 Overall the suitability of the site for reptiles is low, although some habitat that could support reptiles does occur, largely at the periphery of the site. Potential impacts on reptile species associated with the proposed development include localised habitat loss where, for example, the vegetated mounds are not retained, and the risk of killing and injury during works. If present, opportunities should be sought to provide on-site mitigation, wherever possible, potentially as part of any informal open space provision.

Recommendations for further survey

- 4.21 Targeted survey to determine presence or probable absence of reptiles is recommended. The reptile survey should be undertaken between April and September, and involves the distribution and checking of artificial refugia located throughout areas of suitable habitat. The findings will be used to inform any future scheme design and to determine any appropriate mitigation.

Invertebrates

- 4.22 The site is not considered to offer any habitats likely to support notable invertebrates or an especially diverse assemblage overall and as such, no significant detrimental impacts on notable or protected invertebrates are anticipated.
- 4.23 Habitat retention and creation as set out under 'Opportunities for Ecological Enhancement' below are anticipated to benefit to the invertebrate assemblage as part of the general benefit to biodiversity.

⁷ Based on methodology set out in: Oldham R.S., Keeble J., Swan M.J.S. & Jeffcote M. (2000). Evaluating the suitability of habitat for the Great Crested Newt *Triturus cristatus*. Herpetological Journal 10 (4), 143-155

⁸ English Nature (2000) Great Crested Newt Mitigation Guidelines. English Nature, Peterborough

Opportunities for Ecological Enhancement

- 4.24 In addition to the recommendations made for specific habitats and species above, a range of opportunities for enhancement should be explored as part of future development design, as described below.
- 4.25 To increase the complexity of the habitat mosaic, as well as varying the recreational landscape, opportunities include the provision of planting alongside the retained hedgerows (species selected to maximise native diversity). Some sections of hedgerow could be allowed to naturally widen. In general terms, landscape planting should incorporate a range of native tree, shrub and herbaceous species of local provenance. In particular, flowering and fruiting plants of benefit to invertebrates, would be appropriate.
- 4.26 There is also opportunity to enhance grassland habitats on site alongside new development. At present, a close-grazed improved sward exists and retained areas of public open space could be managed to allow a taller, more structurally varied sward to develop under a relaxed mowing regime, e.g. in swathes along side the retained hedgerows mentioned above. Alternatively, more diverse grassland could be sown and encouraged to try to establish a more species rich sward which may have additional biodiversity benefits, such as for invertebrates.
- 4.27 The orchard located close to the centre of the site should be retained and potentially extended or supplemented using a range of locally appropriate species, as part of an area of public open space. Orchard trees may also be planted elsewhere on site as complementary habitat and recreational community features. Sensitive management of the grassland throughout the orchard(s) would contribute to biodiversity and would be covered within prescriptions in the Landscape and Habitat Management Plan.
- 4.28 Creation of wetland habitats both within the areas of open space and within the development parcels as part of site drainage and SUDS offers significant opportunity for enhancement. Example features include ephemerally wet swales and permanently wet standing water (ponds), planted with species beneficial to wildlife. Ponds can incorporate areas of open water as well as planting whilst accommodating health and safety requirements relating to public open space (shallow bank slope, etc). Particular benefit to species such as amphibians, reptiles and invertebrates can be achieved where wetland habitats are created in combination with other features such as log piles and hedgerows.
- 4.29 Dead and decaying wood is relatively limited on site. Where such material is generated through felling or lopping, this may be retained on site as a habitat

feature. Partially buried log piles, may for example be created close to hedgerows or to newly created wetland features.

- 4.30 Care should be taken to carefully manage and direct recreation uses on site to ensure that this does not conflict with wildlife mitigation and enhancement work. For example, access may be guided by mown or natural surfaced paths, dense thorn planting, soft landscaping and other measures.
- 4.31 A sensitive lighting strategy should be implemented during both construction and in the long term during operation. The strategy would address the spatial and temporal use of lighting as well as the type and intensity of artificial light sources. It would seek to ensure that use of retained and created wildlife features by nocturnal and crepuscular species is not deterred, for example, artificial lighting of boundary features, particularly at canopy height, should be avoided where possible.
- 4.32 Provision of new roosting opportunities for bats, such as bat tubes, bat bricks and bat boxes incorporated into, or attached on, new built structures. Similarly, new nesting opportunities for birds may be provided by installing a range of bird boxes suitable for locally appropriate species. Features should be positioned at appropriate height and aspect, away from artificial lighting, to increase the likelihood of uptake.
- 4.33 Production of a Landscape and Habitat Management Plan to prescribe the management and monitoring requirements for retained and created habitats on site. Appropriate methods and timings for tasks would be clearly set out. The Plan would address recreational activities to ensure sensitive areas are protected in the long term. It would also contribute to the requirements of BREEAM and/or Code for Sustainable Homes credits.

5.0 SUMMARY AND CONCLUSIONS

- 5.1 The c.36ha site is bounded by well-established hedgerows and scattered trees, with a series of horse grazed fields across the interior which are divided by a network of hedgerows and paths. Overall, the habitats present on site are considered to be of no more than local ecological value. The site also has potential to support a number of protected species or species-groups.
- 5.2 The Development Concept Plan includes open space across the north of the site, and along some of the existing field boundaries, which extend between the proposed development parcels. Sensitive design of the green space, across both the public open space and the development parcels, will help to optimise both wildlife and recreational functions. Any future development will need to accommodate both existing and future recreation demands in order to avoid potential off-site impacts on designated wildlife sites associated with recreational pressure. Early consultation with the Local Planning Authority is recommended to explore this in detail as any development proposal is taken forward.
- 5.3 Future development is anticipated to incorporate the majority of the hedgerows and mature trees around the site periphery. Opportunities for habitat creation, to extend and enrich the mosaic, include expansion of the hedgerow network, creation of structurally diverse and species-rich grasslands and creation of permanent and ephemeral wetland habitats.
- 5.4 Whilst broad principles of mitigation and opportunities for enhancement have been set out, further surveys have been recommended for some species/groups including bats, GCN and reptiles to fully assess any potential impacts. Subject to the results of such further surveys and the subsequent agreement and implementation of appropriate mitigation, it is anticipated that there is potential for residential development to proceed at this site without significant ecological impact.
- 5.5 It is recommended that the management of retained and newly created habitats is set out in a Landscape and Habitat Management Plan to ensure the goals for biodiversity, landscape and recreation are achieved in the long term. The provisions set out in such a Plan could ultimately be implemented through planning condition to secure ecological enhancement.

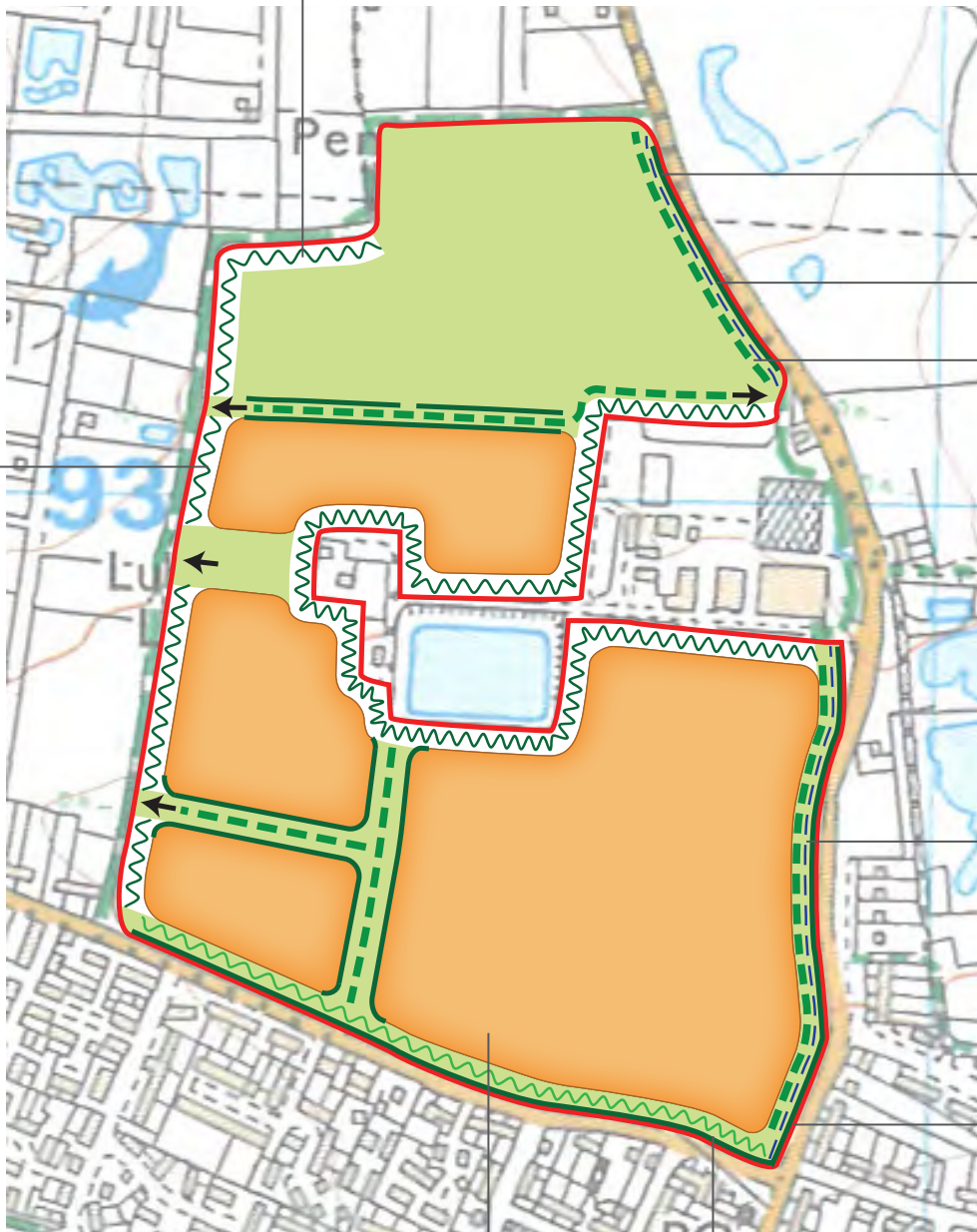
APPENDIX A

Development Concept Plan (CSa/2022/105)

Landscape buffer to public right of way



Landscaping along western boundary to retain soft edge with adjoining footpath



Create enhanced landscape setting to public right of way

Retain character of Hullbridge Road









Retain and reinforce boundary vegetation

Retain public right of way within green corridor

Retain and reinforce boundary vegetation

Housing frontage to Rawreth Lane to be set back behind landscape strip

Retain and reinforce boundary vegetation

-  Site boundary
-  Significant public open space
-  Landscape buffer / landscape strip
-  Green corridors
-  Existing hedgerows
-  Existing public right of way retained within site
-  Pedestrian links
-  Development area

APPENDIX B

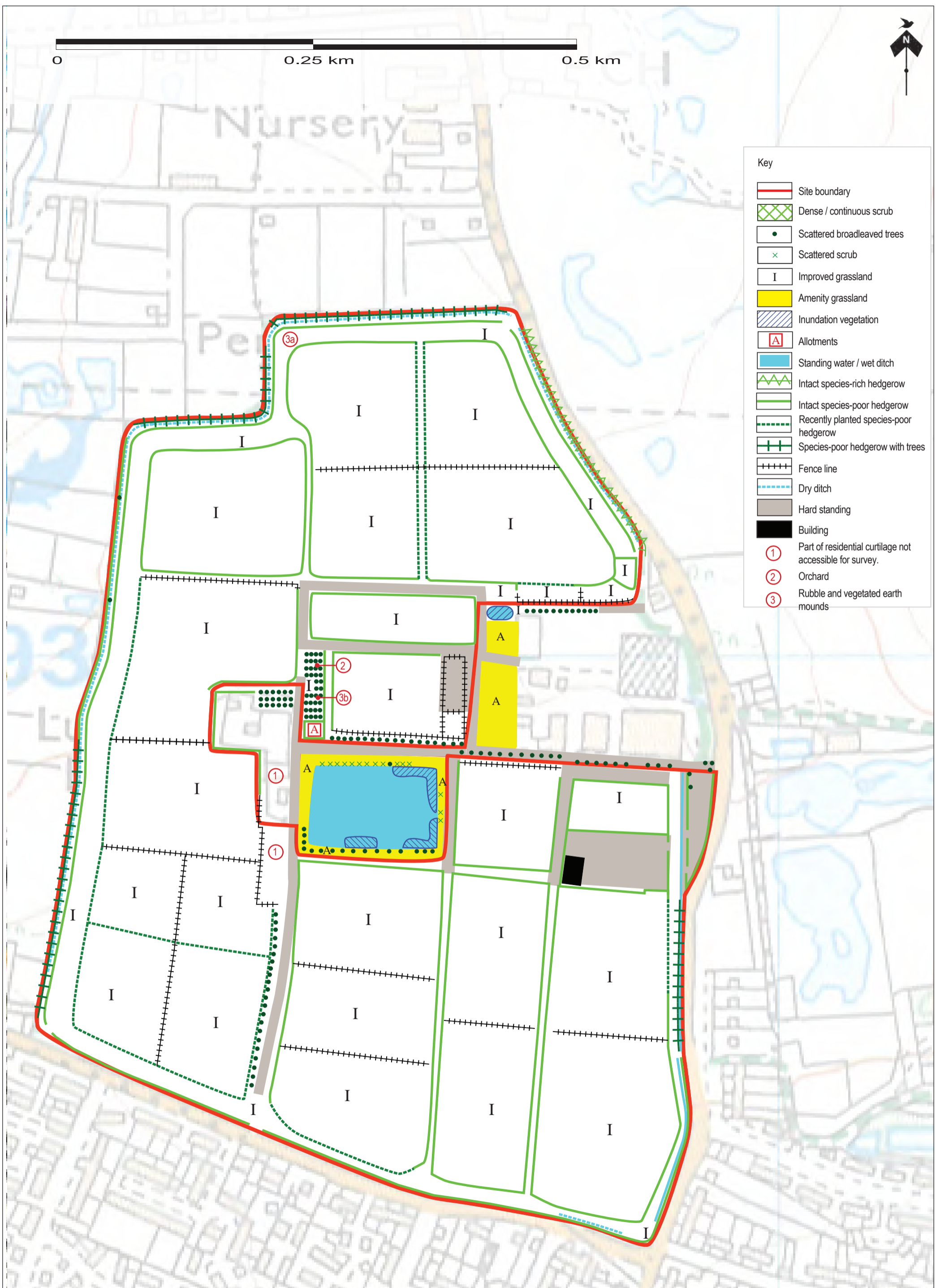
Habitats Plan (CSa/2022/106) and Site Photographs

0 0.25 km 0.5 km



Key

	Site boundary
	Dense / continuous scrub
	Scattered broadleaved trees
	Scattered scrub
	Improved grassland
	Amenity grassland
	Inundation vegetation
	Allotments
	Standing water / wet ditch
	Intact species-rich hedgerow
	Intact species-poor hedgerow
	Recently planted species-poor hedgerow
	Species-poor hedgerow with trees
	Fence line
	Dry ditch
	Hard standing
	Building
	Part of residential curtilage not accessible for survey.
	Orchard
	Rubble and vegetated earth mounds



<p>Dixies Barns, High Street, Ashwell, Hertfordshire, SG7 5NT t 01462 743647 f 01462 743648 e ashwell@csaenvironmental.co.uk</p>	Project	Hullbridge Road, Rayleigh	Date	October 2012	Drawing Number	CSa/2022/106
	Title	Habitats Plan	Scale	Refer to scale bar	Revision	-
	Client	C.E.G.	Drawn	TB	Checked	SS

Photograph 1: Public footpath around site boundary, flanked by a double hedgerow



Photograph 2: Grassland belt, c.20m wide, inside the perimeter path around the west, north and east (north of light industrial park) boundaries for exercising horses



Photograph 3: Rubble and vegetated earth mounds in the north west of the site



Photograph 4: Wet ditch extending along the east boundary, south of the light industrial park



Photograph 5: Pond located at the north west corner of the light industrial park



Photograph 6: Orchard at the centre of the site, north east of Lubard's Lodge



Appendix D

Report to the Rochford District Council Local Development Framework Sub-Committee

21 March 2012

OPTIONS FOR EARLY REVIEW OF THE CORE STRATEGY

1 SUMMARY

- 1.1 The Council is committed to an early review of the Rochford Core Strategy. This commitment relates primarily to the requirement for Local Planning Authorities (LPAs) to have in place policies and strategies for delivering the level of housing provision that will enable continuous delivery of housing for at least 15 years from the date of adoption; due to delays in its examination, the end date for the Rochford Core Strategy is less than fifteen years.
- 1.2 This report considers options in the approach the Council may take to a review of the Core Strategy, and seeks Members' views on the way forward.

2 INTRODUCTION

- 2.1 On 13 December 2011 the Council adopted the Rochford Core Strategy. The Rochford Core Strategy contains policies and strategies that address an array of different planning issues for the District, including the provision of housing.
- 2.2 The Core Strategy was required to conform to Government policy. Government policy (contained within PPS3) includes the following requirement:-
- “Local Planning Authorities should set out in Local Development Documents their policies and strategies for delivering the level of housing provision, including identifying broad locations and specific sites that will enable continuous delivery of housing for *at least 15 years from the date of adoption*, taking account of the level of housing provision set out in the Regional Spatial Strategy” (my emphasis).
- 2.3 The Rochford District Core Strategy was submitted to the Planning Inspectorate for independent examination in January 2010. The Core Strategy includes policies that enable the provision of housing until 2025.
- 2.4 The role of the Planning Inspectorate is to conduct an examination into the soundness and legal compliance of the Core Strategy on behalf of the Secretary of State. Guidance from the Planning Inspectorate states that the time period between submission and their final report on soundness and legal compliance is six months. That being the case, it was anticipated the final Core Strategy would be adopted in autumn 2010.
- 2.5 However, a number of events, primarily at national level, caused delays to the process. Most notably, statements and instructions issued by the Secretary of State for Communities and Local Government, followed later by Court judgments that these were unlawful.

-
- 2.6 As a result, the Inspector's final report on the soundness of the Core Strategy – including binding recommendations – was not issued until 27 October 2011.
- 2.7 The Inspector's binding recommendations included a requirement that the Rochford Core Strategy included a commitment to an early review of the Plan, in order to address the issue vis-à-vis 15-year time horizons in respect of housing provision.
- 2.8 On 13 December 2011, Council adopted the Rochford District Core Strategy, including the commitment to an early review.

3 BACKGROUND INFORMATION

NPPF

- 3.1 The Government intends to replace the current suite of National Planning Policy Statements, Planning Policy Guidance and Circulars with a single, streamlined policy document: the National Planning Policy Framework (NPPF). The NPPF will therefore have a significant impact on the Core Strategy review.
- 3.2 The Government has published its draft NPPF. This draft places economic growth and development as being central to the definition of sustainable development and then includes a presumption in favour of sustainable development. Local Plans will be required to conform to the NPPF. In the absence of an up-to-date and consistent Plan, the draft NPPF proposes planning applications should be determined in accordance with the NPPF, including its presumption in favour of sustainable development.
- 3.3 The draft NPPF proposes Councils be required to prepare a Strategic Housing Market Assessment (SHMA) to assess full housing requirements, working with neighbouring Authorities where housing market areas cross administrative boundaries. It states Councils should plan to meet their full requirement for housing and ensure there is choice and competition in the land market to facilitate the delivery of homes on the ground. Furthermore, the draft NPPF states that, in defining Green Belt boundaries, Local Planning Authorities must "ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development".
- 3.4 Rochford District Council reported a number of concerns in respect of the draft NPPF back to Government, for consideration in the House of Commons Communities and Local Government Committee's inquiry into the draft NPPF.
- 3.5 The Council's concerns included that some aspects of the draft NPPF may leave the Green Belt more vulnerable to development than is presently the case. One such point of concern, for example, relates to one criterion for defining the Green Belt boundary through Local Plans, which states "ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development". Whilst this is a somewhat unclear and

ambiguous criterion, one potential interpretation of this could be that Local Planning Authorities are required to re-draw the Green Belt boundary to accommodate market demands (as opposed to identified development needs) in their totality, with no recognition of the Green Belt as a constraint. The Council raised the concern that, if such an interpretation was deemed correct, it would be tantamount to an end to Green Belt policy.

- 3.6 The Council was not alone in expressing concerns with the draft NPPF. Indeed, the House of Commons Communities and Local Government Committee has suggested a number of alterations be made.
- 3.7 The final NPPF is expected to be published before the end of March 2012.

Legal Challenge to Adopted Core Strategy

- 3.8 On 19 January 2012, Rochford District Council received notification of a legal challenge to the Core Strategy.
- 3.9 The legal challenge has been brought by Cogent Land LLP; the challenge seeks to quash policies H1, H2, H3 and paragraphs 4.1 to 4.31 in the Core Strategy, which relate to Housing. The rest of the Core Strategy is unaffected by this challenge. Until the challenge is determined, the whole of the Core Strategy has full effect, as adopted.
- 3.10 Counsel has been instructed to defend this claim. Formal grounds of resistance to the claim have been filed with the Court. The hearing has been listed to be heard over two days in Cardiff on 31 May and 1 June 2012.

4 OPTIONS FOR EARLY REVIEW

- 4.1 There are a number of options that can be considered in terms of the form the early review of the Core Strategy could take. These are set out below, together with resource, timescale and other implications. Once a preferred option for review is agreed a project plan can be prepared, to include a detailed timetable and costs.

Option A: Review Core Strategy in its Entirety

Prepare a new plan to reflect the NPPF, Localism Act and new evidence base (including demographic studies and housing market assessment). Other areas of evidence base may be required to be updated, including retail and employment studies.

Resource use:	High
Cost:	Very high
Estimated time from start to adoption:	4 years
Other issues:	-

Option B: Review Housing Policies in their Entirety

Spatial and phasing aspects of housing policies revised, with the review commencing with a new issues and options stage and housing policies developing and evolving iteratively through to submission. Consultation, community involvement and appraisal would be undertaken at each stage. Housing policies would reflect NPPF, Localism Act and new evidence base (including new demographic studies and housing market assessment). Any changes to housing policies may necessitate changes to other policies, e.g., employment, as in-combination effects would need to be reviewed.

Resource use:	High
Cost:	High
Estimated time from start to adoption:	3 years
Other issues:	Impact of changes to housing policies (if any) on other policies would need to be reviewed

Option C: Quantums in Policies H2 and H3 Revised to Ensure Adequate Housing Provision to 2031

Policy time frames extended to 2031. Broad strategy and approach to distribution of housing as per existing Core Strategy with housing figures revised to provide 1,500 additional dwellings within locations identified. This would require investigation as to whether general locations identified in the Core Strategy are capable of accommodating additional dwellings, plus appraisal of environmental impacts and sustainability of such an approach. Further consultation would be required, including community involvement.

Resource use:	Medium
Cost:	Low
Estimated time from start to adoption:	2 years
Other issues:	<ul style="list-style-type: none"> • Plan may not conform to NPPF; • No opportunity to review evidence base to determine appropriate total housing figure for District

Option D: Additional Policy to Core Strategy Covering Period 2025-2031

Core Strategy retained as per adopted version, with addition of policy for housing development 2025-2031. 2025-2031 policy to reflect NPPF and updates to evidence base, and will account for preceding delivering rate 2012-2025 (i.e., it may not entail provision of 250 dwellings per annum - may be an increase or decrease depending on final NPPF and revised evidence base).

New policy to be developed from issues and options, and subject to consultation and appraisal.

Resource use:	Low / medium
Cost:	Low
Estimated time from start to adoption:	1.5 years
Other issues:	<ul style="list-style-type: none"> • No opportunity to review Core Strategy policies for housing development to 2025. • Core Strategy to 2025 may not account for NPPF.

Option E: Re-Consider and Revise Policy H3

Policy for housing distribution to 2021 remains as per adopted Core Strategy. Policy for housing distribution post-2021 amended and extended to 2031. 2021-2031 housing distribution to reflect updates to evidence, and will account for preceding delivery rate 2012-2021 (i.e., it may not entail provision of 250 dwellings per annum – may be an increase or decrease, depending on final NPPF and revised evidence base). A new policy to be developed from issues and options, and subject to consultation and appraisal, reconsidering current approach for housing 2021-2025.

Studies may determine that no change to Policy H3 is required, i.e., if evidence base indicates that no additional housing required from that proposed in current Core Strategy, current policy for post-2021 housing development will be adequate. However, such a scenario is unlikely if the NPPF remains in its current form.

Resource use:	Medium
Cost:	Low / medium
Estimated time from start to adoption:	1.5 years
Other issues:	<ul style="list-style-type: none"> • No opportunity to review Core Strategy policies for housing development to 2021. • Core Strategy to 2021 may not account for NPPF.

5 RECOMMENDATION

- 5.1 It is proposed that the Sub-Committee considers the various options for early review of the Core Strategy and **RECOMMENDS** which option is to be pursued, or alternatively, whether a different course of action should be taken.

Shaun Scrutton

Head of Planning and Transportation

Background Papers:-

None.

For further information please contact Samuel Hollingworth on:-

Phone: 01702 318191

Email: samuel.hollingworth@rochford.gov.uk

If you would like this report in large print, Braille or another language please contact 01702 318111.

Appendix E

Correspondence with Planning Policy Officer, 16 January 2013

Steven Butler

From: Natalie Hayward <Natalie.Hayward@Rochford.gov.uk>
Sent: 16 January 2013 15:53
To: Steven Butler
Subject: RE: Core Strategy Review

Steven,

Thank you for your email.

There are number of different factors which has delayed a final decision on the nature of the review, such as uncertainty in respect of the RSS, the national position, and awaiting the production of evidence base documents including the SHLAA and SHMA. In addition we have been progressing the Allocations and Development Management documents, and the Area Action Plans.

Kind regards,

Natalie Hayward
Senior Planner - Planning Policy
Rochford District Council
01702 318101
FeatureNet 785 3516
natalie.hayward@rochford.gov.uk
<http://www.rochford.gov.uk>

The above comments are those of an Officer of the Council and are without prejudice to further consideration of this matter or to the Council's final decision

Planning Homepage:- <http://www.rochford.gov.uk/planning.aspx>

Find out the latest news on Rochford's Local Development Framework:-

http://www.rochford.gov.uk/planning_and_building_control/policy/local_development_framework.aspx

Register for an LDF Online Consultation Account:- <http://rochford.idi-consult.net/ldf/>

View planning applications:- http://www.rochford.gov.uk/planning/planning_applications.aspx

Make a planning application online:- <http://www.planningportal.gov.uk/>

Do you want to be involved in other consultations across the Council? If so, visit <http://www.rochford.gov.uk/haveyoursay> to sign up to the Have Your Say Group

From: Steven Butler [<mailto:Steven.Butler@bidwells.co.uk>]
Sent: 15 January 2013 12:31
To: Natalie Hayward
Subject: RE: Core Strategy Review

Natalie,

Many thanks for your response.

I have one question. Is there a particular reason why the Council has not considered the nature of the review over a year since the Sub-Committee made its recommendation?

I look forward to hearing from you.

Kind regards

Steven Butler
Senior Planner

Planning Division

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dd: 01245 505069
m: 07769687142

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From: Natalie Hayward [\[mailto:Natalie.Hayward@Rochford.gov.uk\]](mailto:Natalie.Hayward@Rochford.gov.uk)
Sent: 15 January 2013 12:18
To: Steven Butler
Subject: Core Strategy Review

Dear Steven,

In response to your query yesterday regarding the Core Strategy review, I would like to clarify the current situation.

The recommendation of the LDF Sub-Committee on 21 March 2012 was that the Core Strategy review will entail revisiting and reviewing Policy H3, as set out in the Officer's report. This recommendation will be considered by the Council in determining the way forward in respect of the Core Strategy review, but the Council has not yet reached a final decision on the nature of the review.

I hope the above is of assistance.

Kind regards,

Natalie Hayward
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Rochford District Council
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The above comments are those of an Officer of the Council and are without prejudice to further consideration of this matter or to the Council's final decision

Planning Homepage:- <http://www.rochford.gov.uk/planning.aspx>

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