



ROCHFORD

**LOCAL DEVELOPMENT
FRAMEWORK:**

**Sustainability Appraisal/
Strategic Environmental
Assessment**

**Sustainability Appraisal
Technical Report**

Addendum (final version)

July 2011



Sustainability Appraisal incorporating Strategic Environmental Assessment of Rochford's Local Development Framework:

ROCHFORD CORE STRATEGY SUBMISSION DOCUMENT

Sustainability Appraisal Addendum

<i>date:</i>	<i>July 2011</i>
<i>prepared for:</i>	<i>Rochford District Council</i>
<i>prepared by:</i>	<i>Toney Hallahan</i>
<i>quality assurance:</i>	<i>Barbara Carroll</i>



SA of Rochford's Local Development Framework Core Strategy Sustainability Appraisal Report Addendum

CONTENTS

- 1. Introduction**
- 2. Summary Review of SA Alternatives**
- 3. Further appraisal of alternatives: general housing development locations**
- 4. Further appraisal of alternatives: general employment development locations**

APPENDICES

Appendix 1 - Detailed appraisal matrices (housing development locations)

Appendix 2 - Detailed appraisal matrices (employment development locations)

Appendix 3- Summary and responses to Addendum report June 2011

1. Introduction

Background

- 1.1 Rochford District Council's LDF Core Strategy Proposed Submission draft DPD was published for public consultation in September 2009 for a six week period. It was accompanied by a Sustainability Appraisal Report produced by consultants, Enfusion Ltd. The Proposed Submission Draft incorporated comments and representations from public consultation on the earlier versions of the plan and the sustainability appraisal undertaken throughout the plan-making process.
- 1.2 The Council submitted the Rochford District Core Strategy to the Secretary of State in January 2010. Since that time the document has been under examination by the Planning Inspectorate to determine whether it is sound and legally compliant. During the course of the examination, the change in government and subsequent changes in national policy have resulted in delays in the determination of the Core Strategy's soundness.
- 1.3 In light of the recent High Court Ruling *Save Historic Newmarket v. Forest Heath District Council*, Enfusion advised the Council that it would be prudent to undertake a review of the Core Strategy Sustainability Appraisal, ensuring compliance with the new case law on SEA arising from this ruling. Rochford District Council has subsequently requested that the issuing of a decision on the soundness of the Core Strategy be delayed to enable the Council to undertake such a review. The Planning Inspectorate has accepted this request and the Council commissioned Enfusion in May 2011 to undertake the work. In response to the findings of the Forest Heath Case, this addendum SA report provides a summary of the alternatives considered throughout the production of the plan setting out the reasons for selecting /rejecting those alternatives. It also includes consideration of more detailed housing locations (than previously appraised). In addition to informing the Core Strategy, this work will also help to guide the further development of the Council's Site Allocations DPD. This addendum report should be read in conjunction with previous Sustainability Appraisal Reports and iterations of the Core Strategy, in particular the SA report of the LDF Core Strategy Proposed Submission draft DPD (2009) for a full account of how the Sustainability Appraisal has influenced the process to date.

Consultation

- 1.4 This report was made available for public consultation from 13 June to 11 July 2011. A total of 58 responses were received; these are summarised in the table at Appendix 3. The table also includes responses to those comments and a summary of how the comments have been incorporated, as relevant, into this final report. This Sustainability Appraisal Addendum will then be submitted to the Planning Inspectorate.

Method

- 1.5 The same method of appraisal using the SA framework of objectives and decision-aiding questions for sustainable development in the Rochford District area was used as previously in the SA of the draft DPDs. The SA framework of objectives and decision-aiding questions was agreed with Natural England, the Environment Agency and English Heritage in late 2005 and further refined and consulted on in 2008.
- 1.6 All potential locations would need to comply with policies on sustainable design and construction, and climate change/energy requirements. All housing locations would contribute to meeting the SA objective relating to housing. Therefore, these SA objectives are common to all locations at the strategic appraisal level and were not considered in these SAs. Transport-related greenhouse gas emissions results correlate with the accessibility SA objective, so it is also noted that where a location performs poorly on accessibility, it is also likely to perform poorly on climate change. The sensitivities of the different Landscape Character Areas (LCAs) to development are given consideration under SA objective 8- landscape and townscape- for example the Crouch and Roach Farmland LCA is generally more sensitive to developments and changes in Rochford District than the South Essex Coastal Towns LCA.
- 1.7 A strategic approach was taken – appropriate to the Core Strategy level of plan-making and to minimise pre-empting the preparation of the Site Allocations DPD that will consider sites in more detail. The SA addendum should be read in conjunction with the previous SA work undertaken. The approach to alternatives (or options) appraisal has involved a hierarchical approach – options relating to the general approach to development and the distribution of housing between the settlements were previously appraised (refer section 4 and 5 of the SA of Rochford Core Strategy Submission Document (2009) for details, especially the Option 'general development

locations' and policies H1, H2 and H3) . This SA Addendum has therefore considered the approach to general locations within each settlement.

1.8 Where particularly relevant, comment was made on comparative appraisal between locations and settlement areas. The appraisal was based on professional opinion, supported by evidence including the following documents:

- RDC SEA Scoping Report and Baseline(Essex County Council),
- RDC Core Strategy Submission Document Habitats Regulations Assessment
- RDC Core Strategy Submission Development Plan Document
- RDC Core Strategy Submission Document SA Report
- RDC Local Development Framework Allocations DPD Discussion and Consultation document (Regulation 25)
- Maps, including Rochford District replacement Local Plan Proposals Map

1.9 Often the finding 'no significant effects identified' is given. This finding is used to denote that the development of the location is unlikely to have a significant effect on the SA objective in question. Whilst this is the case, there may be an overall cumulative effect from the sum of all developments, for example pressures on water supply and quality- any cumulative issues of significance were considered in Section 6 of the Sustainability Appraisal Submission report.

2. Summary review of alternatives assessment

- 2.1 The EU SEA Directive requires that a report shall be prepared "*...in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated*" (Article 5 (1)). Information to be included in the report includes "*an outline of the reasons for selecting the alternatives dealt with*" (Annex I (h)).
- 2.2 The recent Forest Heath high court ruling¹ and recommendations by DCLG in its report on the effectiveness of SEA and SA² have clarified and provided an additional interpretation of the EU SEA Directive. This section of the SA Report Addendum therefore seeks to provide a clear summary of the alternatives considered throughout the SA process and the reasons for selecting/rejecting those alternatives.

SA and Plan Making Alternatives 2006-2010

- 2.3 Whilst the SEA Directive does not define what a reasonable alternative is, UK practical guidance on SEA³ and SA/SEA⁴ advises that "realistic" alternatives should be considered. In 2010, the UK Government reported⁵ on a more efficient and effective use of SEA and SA in spatial planning. This recommended that "*Plan-making should generate well thought out and clearly articulated alternatives*" (recommendation 5) and that "*The appraisal should consider the extent to which options and policies will be effectively delivered on the ground to help avoid unrealistic assessment results*" (recommendation 8).
- 2.4 The EU SEA Directive requires that responsible authorities and the public should be given "*...an early and effective opportunity within appropriate timeframes to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme*" (Article 6 (2)).
- 2.5 The SA/SEA of the Rochford LDF Core Strategy has been an iterative and ongoing process with plan making since 2006. SA/SEA reports including the

¹ Save Historic Newmarket vs. Forest Heath District Council [2011] EWHC 606 (admin)

² DCLG, 2010 <http://www.communities.gov.uk/documents/planningandbuilding/pdf/1513010.pdf>

³ ODPM 2005 A Practical Guide to the SEA Directive

<http://www.communities.gov.uk/publications/planningandbuilding/practicalguidesea>

⁴ PAS 2010 Sustainability Appraisal Advice Note <http://www.pas.gov.uk/pas/aio/627078>

⁵ DCLG, 2010 <http://www.communities.gov.uk/documents/planningandbuilding/pdf/1513010.pdf>

consideration of alternatives have been prepared and made available for public consultation at each stage.

2.6 Alternatives (referred to as 'options' throughout the process) were developed initially during early 2006 and were subject to SA by Essex County Council's Environmental Assessment team. The Issues and Options and accompanying SA report were published for consultation in September 2006. The SA and the consultation helped to determine the preferred overall spatial strategy and preferred options, which were published for public consultation in May 2007. Table 2.1 summarises the options/alternatives considered, with an outline of the reasons for rejection where relevant. It should be noted that whilst the SA findings are considered by the Council in its selection of options and form part of the evidence supporting the LDF, the SA findings are not the sole basis for a decision; planning and feasibility factors play a key role in the decision-making process. In this table "high" refers to a greater number of criteria with effects compared to "small" which refers to a lesser number of effects. The details of appraisal findings are set out in the main SA Report (September 2009).

Table 2.1: Summary of Approach to Alternatives Assessment and Selection

Options Considered and Appraised; Published Reports and Public Consultation	Reasoning for Progressing or Rejecting the Option in Plan Making
September 2006 Issues and Options SA Report:	
<p>Strategic Option 1: The Green Belt & Strategic Gaps between Settlements</p> <p>Four alternatives considered: A - Relaxation of greenbelt policy. B - No strategic gaps, allowing coalescence in areas where the greenbelt performs only a token purpose. C - Continue its restrictive suite of policies for development within the greenbelt, in line with national guidance. D - Strategic gaps will be defined and protected by policy.</p>	<p>Options A and B were not taken forward due to the negative impacts they would have on the openness of the greenbelt and on the District as a whole. A combination of the other options was taken forward to reflect better sustainable development, and to promote a more sustainable strategic approach whilst minimising negative impacts on the District.</p>
<p>Strategic Option 2: Protection and Enhancement of the Upper Roach Valley</p> <p>Five alternatives considered: A - No country park allocation. B - No local landscape designations. C - No need for a further designation.</p>	<p>Option A was rejected as it has the most detrimental impact and greatest proportion of negative impacts. In contrast options D and E have the greatest proportion of major positive and positive impacts.</p>

<p>D - A policy providing for protection/enhancement and increased recreation opportunities.</p> <p>E - Identify land to be included in the Cherry Orchard Jubilee County Park and any further proposed extensions.</p>	
<p>Strategic Option 3: Protection and Enhancement of Special Landscape Areas</p> <p>Seven alternatives considered:</p> <p>A - No local landscape designations.</p> <p>B - No coastal protection belt.</p> <p>C - No protection for the landscape.</p> <p>D - Freedom for agriculture, horticulture, equine uses, leisure and tourism uses whilst restricting employment and housing uses.</p> <p>E - Protection for the undeveloped coast.</p> <p>F - Protection for the three Special Landscape Areas.</p> <p>G - Protection of the Area of Historic Landscape and Ancient Woodlands.</p>	<p>Options A, B and C resulted in significant negative impacts and so were discounted. Option D shows a high uncertain result in the short medium and long term.</p> <p>Options E, F and G showed some major positive impacts and as such, a combination of Options E, F and G was taken forward.</p>
<p>Strategic Option 4: Housing numbers</p> <p>Four alternatives considered:</p> <p>A - Not attempting to meet the cascaded figure due to the restrictive development position with regard to the green belt.</p> <p>B - Relying on windfall development and urban intensification, to prevent the need for any green belt releases.</p> <p>C - Not allocating land to accommodate all the dwelling units and relying on a percentage of windfall development and urban intensification.</p> <p>D - Ensuring enough land is allocated to accommodate all of the cascaded figure for homes from the East of England Plan (RSS14) for the period 2001 to 2021.</p>	<p>Options A, B and C demonstrate a declining positive effect over time, with negative implications in the future. Option D has a positive to uncertain effect in all temporal extents.</p> <p>As such, and having regard to the requirements for Development Plan Documents, Option D was taken forward.</p>
<p>Strategic Option 5: General Development Locations</p> <p>Five alternatives considered:</p> <p>A - Greater dispersal to minor settlements, enabling possible regeneration of local facilities.</p> <p>B - Split the housing allocation evenly between the parishes (excluding Foulness), so that each area gets a small amount of housing.</p> <p>C - Develop a new settlement, well related to transport links and providing its own basic infrastructure.</p> <p>D - Focus solely on an expansion of one</p>	<p>The September 2006 Issues and Options SA Report noted Options A and B have major negative effects in the short, medium and long term. It was also demonstrated that option C would result in increasingly negative impacts throughout time. Option D has a diverse range of impacts with both negative and positive effects whilst Option E has the greatest concentration of positive effects.</p> <p>As such, Option E was carried forward and subsequently developed having regard to the evidence base and the results of community involvement.</p>

<p>settlement, creating a significant urban expansion. E - Allocate the total number of housing units to the top and second tier settlements, to gain a smaller number of large sites which will deliver the greatest amount of infrastructure improvements.</p>	
<p>Strategic Option 6: Affordable Housing</p> <p>Three alternatives considered: A - 30% of all new homes in the District be affordable on all sites. B - 50% of all new homes on sites in excess of 10 units will be affordable. C - Affordable housing will be set at 40% on sites specified in the Allocations DPD.</p>	<p>Option A has no impact on a number of the sustainability criteria; however there are positive impacts on criteria related to housing. Option B also has a high degree of no impact and uncertainty; however there is a greater concentration of positive impacts. Option C has a greater number of major positive impacts.</p> <p>The preferred option on affordable housing was taken forward having regard to the above, as well as issues of viability and the findings of additional evidence base documents.</p>
<p>Strategic Option 7: Accommodation for Gypsies and Travellers</p> <p>Two alternatives considered: A - No Gypsy or Traveller Site to be identified in the green belt. B - Accommodation needs for Gypsy and Travellers will be met by identifying in an existing residential area for a site and formally specifying it in the Allocations DPD.</p>	<p>Option A generally indicates no significant effects for the short-longer term with some minor negative impacts. The adoption of Option B would result in a greater amount of positive effects over the same time period.</p> <p>The preferred approach was developed having regard to the above, and other issues such as deliverability and land supply.</p>
<p>Strategic Option 8: Rural Exceptions</p> <p>Two alternatives considered: A - No rural exceptions policy. B - For windfall sites, 30% of all units will be required to be affordable. On rural exception sites all the units will be required to remain affordable in perpetuity.</p>	<p>Option A generally demonstrated strong neutral impacts, with some negative impact also. Option B in comparison had no negative impacts, but a greater degree of uncertainty.</p> <p>Having regard to the above, Option B was taken forward into the next iteration of the Core Strategy as a preferred option.</p>
<p>Strategic Option 9: Employment</p> <p>Four alternatives considered: A - No jobs figure to be included. B - Provide no details of the general locations C - Allocate a total number of jobs to be</p>	<p>Options C and D displayed greater positive impacts and significantly lower no impact or negative effects than options A and B.</p> <p>Having regard to the above a</p>

<p>created in the District. It will specify areas within the District and their share of the overall total. D - Programme employment development in advance of new housing.</p>	<p>combination of Options C and D was taken forward into the next iteration of the Core Strategy as a preferred option.</p>
<p>Strategic Option 10: Good Design and Design Statements</p> <p>Seven alternatives considered: A - No emphasis on design. B - No emphasis on lifetime housing. C - No emphasis on sustainable design. D - Prescriptive design guidance within policy to ensure uniform design and high standards. E - Push design statements to the fore of the planning application process. F - Require 25% of units provided on all housing sites over 10 units to meet a lifetime housing standard. G - Require, at least compliance with Code for Sustainable Homes the minimum standards.</p>	<p>Options A and B show mostly no impact with some negative impacts, whilst Option C indicates mostly no impact results alongside some positive effects.</p> <p>Options D and E exhibit a combination of mostly no impact effects, with major positive and negative impacts. Option F shows a very high no impact result with less major positive results than other options. Option G demonstrates a slightly lower no impact effect, as well as major positive and positive results.</p> <p>Consequently a combination of the above was taken forward to the next stage.</p>
<p>Strategic Option 11: Character of Place</p> <p>Three alternatives considered: A - No emphasis on character of place. B - Prescriptive design guidance within policy to ensure uniform design and high standards. C - Protection of the District's identity and ensuring that new development respects the local character.</p>	<p>Options A and B display a high level of no impact and negative results, with option B showing positive impacts too. Option C has the greatest concentration of major positive and positive effects - and consequently Option C was taken forward.</p>
<p>Strategic Option 12: Landscaping</p> <p>Three alternatives considered: A - No emphasis on landscaping. B - Continue determining landscaping details post-application and through enforcement work. C - Push landscaping to the fore of the planning application process and making them a prerequisite for determination for certain application types.</p>	<p>Options A and B show strong no impact results, with some negative and uncertain results. Option C also shows a high concentration of no impacts, but also major positives.</p> <p>As such, Option C was taken forward as the preferred option in the next iteration of the Core Strategy.</p>
<p>Strategic Option 13: Energy and Water Conservation</p> <p>Four alternatives considered: A - No emphasis on sustainable design. B - Deliver carbon-neutral development. C - Ensure new development promotes energy and water efficient buildings-also reduces the need to travel.</p>	<p>Options A, B and C all display strong no impact results, with some uncertain effects. Option D shows a higher quantity of no impact result, however, also shows major positive impacts.</p> <p>Option D was taken forward in order to achieve the most positive impacts.</p>

<p>D - Require compliance with the minimum standards, as set out in the Code for Sustainable Homes.</p>	
<p>Strategic Option 14: Renewable Energy</p> <p>Three alternatives considered:</p> <p>A - Push for any renewable energy uses in any location.</p> <p>B - Set a threshold for development size or number before requiring renewable energy to be included.</p> <p>C - Require all new housing and employment development to include renewable energy provision.</p>	<p>Option A has major negative and negative effects as well as no impact results. Option B shows a high no impact effect result, with no negative impacts. Option C indicates the same outcome as Option B but with additional benefits for provision of renewable energy.</p> <p>As such, Option C was taken forward as the preferred option in the next iteration of the Core Strategy.</p>
<p>Strategic Option 15: Compulsory Purchase</p> <p>Three alternatives considered:</p> <p>A - No compulsory purchase policy and attempt to use the legislation if required.</p> <p>B - Designate specific potential compulsory purchase sites.</p> <p>C - Set the framework to ensure that employment, residential, recreational and environmental enhancements for the district can be brought forward using compulsory purchase powers.</p>	<p>Option A has a high no impact and uncertain effect similar to Option B which also shows strong positive and major positive effects.</p> <p>Option C shows no uncertain impacts and shows high major positive and positive effects.</p> <p>As such, Option C was taken forward as the preferred option in the next iteration of the Core Strategy.</p>
<p>Strategic Option 16: Community, Leisure and Tourism Facilities</p> <p>A - Protect the green belt without providing any further guidance, leaving it up to central government in its review of Planning Policy Guidance Note 2.</p> <p>B - Reduce protection of the green belt to allow for community, tourism and leisure facilities.</p> <p>C - No policy on this issue, as it is currently not a major factor in the District.</p> <p>D - Provide a policy dealing with community, leisure and tourism proposals, which will provide clarity for developments, particularly within the Green Belt.</p>	<p>Option A shows a consistent positive effect, uncertain effect and no impact, with no negative implications. Options B and C show a higher degree of uncertainty and a higher negative element whereas Option D has completely uncertain implications.</p> <p>As such, Option A with elements of Option D were taken forward to the next iteration of the Core Strategy, in order to provide the greatest positive impact whilst accounting for local circumstances within a central government policy.</p>

3. Further appraisal of alternatives: general housing development locations

- 3.1 As illustrated above, the Council has considered the results of the SA of issues and options (alternatives) in its selection and rejection of alternatives for plan-making. The Sustainability Appraisal considered a range of issues considered to be of key importance to the development of the Core Strategy. This included consideration of housing numbers and general locations for development (Strategic Options 4 and 5). The SA found that Option E, the allocation of housing to the top and second tier settlements to gain a smaller number of large sites would have the most positive effects of all the options.
- 3.2 In light of the Forest Heath ruling, it was decided to further develop this appraisal, considering the more detailed locations for development within individual top and second tier settlements. The recent publication (in February 2010) of the LDF Allocations DPD Discussion and Consultation Document has also enabled a further consideration of the realistic locations for development, as it incorporates the findings of the call for sites process and Strategic Housing Land Availability Assessment (SHLAA).
- 3.3 Detailed appraisals of housing locations were undertaken for each of the top and second tier settlements and Canewdon, with full details provided in Appendix 1. In addition, Rawreth has been assessed as a location, as response to the Core Strategy consultation had suggested this could be considered as an alternative to other Rayleigh locations. The reasons for selecting or rejecting these locations are summarised below.

Table 3.1: Housing development options for Rochford District: reasons for selection/rejection

Housing development options for Rochford District
Housing development options for Rochford/Ashingdon: <u>Location 1: West Rochford</u> Location 2: South Rochford Location 3: East Rochford Location 4: North Ashingdon <u>Location 5: South East Ashingdon</u> <u>Location 6: East Ashingdon</u>
Reasoning for Progressing or Rejecting the Options in Plan Making : Location 1 (West Rochford) was selected it is a sustainable location, particularly in terms of accessibility, economy and employment, and balanced communities. In addition, the location relates well to London Southend Airport and proposed employment growth there, is not subject to significant environmental constraints

which would inhibit development, and is of a scale capable of accommodating other infrastructure, including a new primary school which would have wider community benefits. The location performs well to the proposed balanced strategy, and, due to its location in relation to Southend and the highway network, would avoid generating traffic on local networks for non-local reasons. The location is unlikely to enable infrastructure improvements to King Edmund School, but is nevertheless selected for the aforementioned reasons.

Location 5 (South East Ashingdon) and Location 6 (East Ashingdon) were selected as they are well located in relation to King Edmund Secondary School, which amongst accessibility benefits also means that there are opportunities for important, required improvements to the school to accompany additional development in these locations to the benefit of the wider community. Location 5 would also allow for a significant amount of development to be accommodated in a manner which does not entail development projecting out into the open countryside.

Location 2 was not selected as it has the potential to engender coalescence with Southend, performed less well in sustainability terms compared with West Rochford and would be less likely to deliver community benefits than development in South East and East Ashingdon.

Location 3 was not selected as it was not considered as sustainable a location as West Rochford. There are greater environmental constraints to the east of Rochford, including Natura 2000 and Ramsar sites. Development to the east of Rochford has the potential to be affected by noise from London Southend Airport, given its relationship to the existing runway. Whilst a small quantum of development may be accommodated within this general location avoiding land subject to physical constraints, such an approach is less likely to deliver community benefits, and would necessitate the identification of additional land, diluting the concentration of development and thus reducing the sustainability benefits of focussing development on larger sites. Location 3 is also unlikely to aid the delivery of improvements to King Edmund School. Furthermore, it would generate traffic on local networks for non-local reasons, i.e. traffic to Southend would be likely to be directed through the centre of Rochford, including through the Conservation Area.

Location 4 was not selected due to its poor accessibility and distance from service and facilities, particularly when compared to alternatives. It was less likely to engender improvements to King Edmund School than Locations 5 and 6.

Housing development options for Rayleigh:

Location 7: West Rayleigh (North of London Road, Rayleigh)

Location 8: East Rayleigh

Location 9: South West Rayleigh

Location 10 : North Rayleigh

Location 11: South/ South East Rayleigh

Location 12: Rawreth village

Reasoning for Progressing or Rejecting the Options in Plan Making :

Location 7 was selected as the preferred location for housing development in Rayleigh, as the location provides opportunities for the co-location of development with the adjacent proposed employment area. Due to its location on the west side of Rayleigh it will also result in less air pollution and congestion in Rayleigh Town centre, as traffic will not need to travel through the centre. It corresponds well to the proposed balanced strategy in the Core Strategy, and relates well to Chelmsford and Basildon, avoiding generating traffic on local networks for non-local reasons.

Location 8, 11, and 9 are all likely to have more of an impact on air pollution and transport in the town centre; locations 10 and 11 could lead to coalescence with Hullbridge and Southend-on-Sea Borough respectively. Locations 8, 10, and 11 perform less well in terms of the proposed balanced strategy, in that they either relate better to Southend than Chelmsford / Basildon, and traffic to the latter centres would be drawn through local networks and town centre. Location 8 was also likely to have negative effects on landscape, being located close to the Upper Roach Valley and Hockley woods. The Sustainability Appraisal found that the West Rayleigh location would have the most positive effects of all the locations, and it performed particularly well on the objectives relating to balanced communities, economy and employment.

Location 12 is detached from Rayleigh, and whilst it relates well to Basildon and Chelmsford centre, it would lead to isolated development poorly served by services and facilities and performs poorly in terms of its sustainability.

Housing development options for Hockley/Hawkwell:

Location 13: West Hockley

Location 14: South Hawkwell

Location 15: Northeast Hockley (incl North Hockley)

Reasoning for Progressing or Rejecting the Options in Plan Making :

Location 13 (West Hockley) was selected as this general location benefits from good access to the centre of Hockley and the local services and facilities located there including education, health and public transport hubs, as opposed to Location 15 where these local services and facilities may be less accessible. There is also a proposed Sustrans route in proximity to this general location. It is well related to recreational opportunities within Hockley Woods and the wider Upper Roach Valley. Development in this location would therefore have a positive impact on sustainability in terms of accessibility and healthy and safe communities. This location also has the potential to utilise existing previously developed land in the locality (although this will be dependent on the allocation of land within this location, if this location were to be included in an adopted Core Strategy), as well as opportunities to create a defensible Green Belt boundary. It relates well in terms of the balanced strategy, as the west of the settlement has a strong relationship with Chelmsford and Basildon.

Location 14 (South Hawkwell) would positively contribute to the balanced strategy as it is well related to London Southend Airport, which is a key economic driver in the area, and the strategic highways network and Southend to the south. There are opportunities to identify sites in this general location which would not project into the open countryside, particularly given the proximity of the Upper Roach Valley (which is a Special Landscape Area), and the potential to create a defensible Green Belt boundary. Development may therefore have a positive impact on economy and employment, balanced communities and landscape. This general location is well related to recreational opportunities as there is a leisure centre situated in south Hawkwell, and areas of public open space are in proximity to it (such as Cherry Orchard Jubilee Country Park and Hockley Woods). A Sustrans route is also proposed in proximity to this general location.

Location 15 (North East Hockley including North Hockley) has a relationship with Chelmsford, Basildon and Southend, and would subsequently direct traffic either through Hockley centre to the south west / west, or along Ashingdon Road to the south, which in conjunction with other general locations identified (such as east Ashingdon and south east Ashingdon) would have a significant impact on the local highway network. In effect it would generate traffic on local networks for non-local reasons, and have a negative impact on the balanced strategy. It is not as well related to local recreational opportunities as west Hockley and south Hawkwell, or the proposed Sustrans route. Furthermore depending on the sites taken forward, this general location may not be well related to local services and facilities in Hockley centre, and as opposed to Locations 13 and 14, it has greater potential to project into the open countryside.

Housing development options for Hullbridge:

South West Hullbridge

Reasoning for Progressing or Rejecting the Options in Plan Making :

Hullbridge is recognised as a distinct settlement with its own community and therefore housing needs, and development at this settlement corresponds towards the balanced approach to housing distribution supported by sustainability appraisal. Hullbridge is subject to significant constraints to the North West and North East that inhibit development. Development to the South West would relate well to Rayleigh and to links towards Basildon and Chelmsford centre without encouraging the generation of additional traffic on local networks for non-local reasons. It also an opportunity for infrastructure improvements that would serve the wider community.

Housing development options for Canewdon:

South Canewdon

Reasoning for Progressing or Rejecting the Options in Plan Making :

Canewdon is recognised as a distinct settlement with its own community and therefore housing needs, and development at this settlement corresponds towards

the balanced approach to housing distribution supported by sustainability appraisal. The location is not subject to significant environmental or physical constraints. In addition, the proposed location sets to provide good accessibility to Rochford town centre and would minimise the impact on traffic passing through the village centre.

Although Canewdon is defined as a tier 3 settlement, the proposed development performs well in relation to the balanced strategy, and would be able to retain the community cohesion of the village.

Housing development options for Great Wakering:

West Great Wakering

Reasoning for Progressing or Rejecting the Options in Plan Making :

Great Wakering is recognised as a distinct settlement with its own community and therefore housing needs, and development at this settlement corresponds towards the balanced approach to housing distribution supported by sustainability appraisal. The location is not subject to significant environmental constraints which would inhibit development, and is of a scale capable of accommodating other infrastructure, including youth and community facilities which would have wider community benefits.

The proposed development to the West relates well to Southend and would therefore minimise additional traffic on local networks for non-local reasons. The location is relatively close to the existing centre and associated services.

4. Further appraisal of alternatives: general employment development locations

4.1 Strategic Option 9, described in section 2, considered strategic options around the provision of employment and considered whether to allocate a total number of jobs and whether to specify employment areas within the District. This was progressed into the Preferred Options and Submission DPD, and a number of strategic employment locations were nominated. These locations and realistic alternatives to the locations have been subject to further sustainability appraisal, with full details provided in Appendix 2. The reasons for selecting or rejecting these locations are summarised below.

Table 4.1: Employment development options for Rochford District; reasons for selection/rejection

Employment development options for Rochford District
<p><u>London Southend Airport</u> <u>West Rayleigh</u> South Rochford (east of Airport)</p>
<p>Reasoning for Progressing or Rejecting the Options in Plan Making :</p> <p>London Southend Airport is recognised as a having the potential to be a key economic catalyst within the sub-region. The approach of focussing additional employment development around London Southend Airport is supported by sustainability appraisal.</p> <p>The allocation of current Green Belt land to the west of Rayleigh was recommended by the Employment Land Study and supported by Sustainability Appraisal.</p> <p>South Rochford (east of Airport) could include the expansion of the existing industrial estate (Purdeys), but the release of additional Green Belt land in this location is not supported by the Employment Land Study. Whilst this location is in proximity to London Southend airport, the area to the east of the airport is disconnected from the airport itself by the existing railway line. Furthermore, there is limited amount of land to the east compared to the north and west of the airport. In addition, development to the south of Rochford has the potential to engender the coalescence of Rochford and Southend.</p> <p>London Southend Airport and land west of Rayleigh were therefore selected as the preferred general locations for employment allocations and South Rochford was rejected.</p>

Other options that were not considered realistic:

Wallasea Island
North Ashingdon

Reason for rejection:

Whilst there is a small amount of existing employment land in Wallasea Island, the area is subject to significant physical constraints and the Employment Land Study does not recommend Green Belt land be allocated for employment within this location.

There is no existing employment allocation to the north of Ashingdon, and the Employment Land Study does not recommend it as a location for the consideration of the release of Green Belt for employment.

The evidence outlined above demonstrates that the release of Green Belt land is justified in West Rayleigh and around London Southend Airport, but not elsewhere within the District. The only other location where existing Green Belt land is proposed to be allocated for employment land is in Great Wakering, but this is simply a direct replacement for existing employment land in this location being deallocated, as recommended by the Employment Land Study.

Appendix 1- Detailed appraisal matrices (housing development locations)

Housing development options for Rochford/Ashingdon:

Location 1: West Rochford

SA Objective	Commentary	Score
1. Balanced communities	The quantum of development that can be delivered in this location provides sufficient economies of scale to fund/develop facilities required by the community.	++
2. Healthy and safe communities	Potential to link to Upper Roach Valley Recreation Area (encompassing Hockley Woods and Cherry Orchard Country Park) and established cycleways, public footpaths and bridleways.	+
3. Housing		
4. Economy & employment	Proximity to and potential for good links to London Southend Airport and surrounding employment, as well as good rail links to other employment opportunities. Development at this location may also contribute to regeneration/economic development at Rochford Town Centre.	++
5. Accessibility	Location has good links to existing community areas and facilities. Good accessibility to employment due to relationship with London Southend Airport employment area; also proximal to town centre and walking distance to Rochford train station. Positive effects through reducing out-commuting and opportunities for commuting by walking and cycling .	++
6. Biodiversity	No significant effects identified.	0
7. Cultural Heritage	Development in this location has the potential to urbanise Hall Road, a gateway to Rochford Town Centre Conservation area, however this could be mitigated through sensitive design.	?
8. Landscape & townscape	Within South Essex Coastal Towns Landscape Character Area ⁶ . No Significant effects identified.	0

⁶ The RDC SEA Scoping report Baseline Information Profile (2007-2008) explains the sensitivities of the various Landscape Character areas in the District: The South Essex Coastal Towns has a medium sensitivity; Crouch & Roach Farmland a Medium-High Sensitivity and the Dengie and Foulness Coast a High-medium sensitivity.

9. Climate change & energy		
10. Water	No significant effects identified.	0
11. Land & Soil	Location includes both grade 1 and grade 2 agricultural land ⁷ .	-
12. Air Quality	Some potential to further exacerbate Air Quality issues in Rochford Town Centre, however a significant proportion of traffic will instead travel south to Southend-on-Sea using Cherry Orchard Way, rather than routing through Rochford Town Centre.	?
13. Sustainable Design & construction		

Summary: Development in this location is supported through Sustainability Appraisal. Major positive effects were identified for Economy and Employment and Accessibility, due to proximity to Rochford Town Centre, its train station, and London Southend Airport employment area. Positive effects identified for health due to potential links to recreation (Upper Roach Valley). As with many locations appraised across the District, development at this location will have negative effects on land and soil, due to its location on grade 1 and 2 agricultural land.

⁷ Rochford District Council SEA Scoping Report and Baseline. Essex County Council. 2006

Location 2: South Rochford

SA Objective	Commentary	Score
1. Balanced communities	The quantum of development that can be delivered in this location provides sufficient economies of scale to fund/develop facilities required by the community.	++
2. Healthy and safe communities	Location has potential for good links to Thames Gateway Greenway proposal 18.	+
3. Housing		
4. Economy & employment	Potential for good links with London Southend Airport Employment site, however access to location difficult due to presence of railway line. Also potential for development in South Rochford to relate well to Southend.	+
5. Accessibility	Further from the Town Centre and railway station than the West and East Rochford locations, but still proximal- also close to London Southend Airport employment site.	+
6. Biodiversity	No significant effects identified.	0
7. Cultural Heritage	No significant effects identified.	0
8. Landscape & townscape	Within South Essex Coastal Towns Landscape Character Area. Development at this location is likely to cause coalescence with settlements in Southend –on-Sea Borough, therefore negative effects on landscape & townscape.	-
9. Climate change & energy		
10. Water	No significant effects identified.	0
11. Land & Soil	Located on grade 1 agricultural land.	-

12. Air Quality	Could further exacerbate Air Quality issues in Rochford Town Centre through increasing traffic on Southend Road.	?
13. Sustainable Design & construction		

Summary: Development at this location would have some positive effects, due to its proximity to London Southend Airport employment area and the Town Centre. However the train line acts as a barrier, and the Town Centre is not within easy walking distance. Negative effects identified for land and soil as located on grade 1 agricultural land.

Location 3: East Rochford

SA Objective	Commentary	Score
1. Balanced communities	The quantum of development that can be delivered in this location provides sufficient economies of scale to fund/develop facilities required by the community. Would also contribute to regeneration in Rochford.	++
2. Healthy and safe communities	Development location within flight path of London Southend Airport, therefore potential for noise pollution. Parts of this location lies within the airport public safety zone, so potential negative effects on community safety. Negative effects identified through increased traffic congestion in Rochford Town Centre (causing disruption, noise pollution and air pollution, with implications for public health).	-
3. Housing		
4. Economy & employment	Location relates well to Purdeys Industrial Estate, however the Estate is unlikely to generate significant levels of new employment, and is not identified as a specific location for employment growth.	+
5. Accessibility	Location is proximal to town centre, although further from train station than the West Rochford Location. It is also further from the London Southend Airport Employment Area and would require most traffic to route through Rochford Town Centre to head south to the Airport or to Southend.	+

6. Biodiversity	Development at this location has the potential for negative effects on the Crouch and Roach Estuaries SPA and Ramsar site due to recreational disturbance from the new residential community ⁸ .	?
7. Cultural Heritage	Development at this location will increase traffic flows through Rochford Town Centre Conservation area, with potential negative effects through increased pollution and noise disturbance.	?
8. Landscape & townscape	The Crouch and Roach Farmland Landscape Character (LCA) area lies to the east of Rochford, and is a more sensitive LCA than for locations to the south and west of Rochford.	?
9. Climate change & energy		
10. Water	Potential for adverse effects on water quality due to location close to the Crouch and Roach Estuaries. Some parts of this location are prone to flood risk, although it is likely that development could be accommodated outside of the flood risk zone.	?
11. Land & Soil	Located on grade 1 agricultural land.	-
12. Air Quality	Any significant development at this location is likely to further exacerbate Air Quality issues in Rochford Town Centre, as most traffic will need to travel through the Town Centre ⁹ .	-
13. Sustainable Design & construction		

Summary: Positive effects were identified for this location for Economy and Employment and accessibility, however these were not considered major, as for some other locations. Negative effects were identified due to noise and safety concerns relating to the location on the London Southend Airport flight path and the requirement for most traffic to route through Rochford Town Centre, increasing congestion, noise and air pollution. Potential effects on biodiversity and water were noted due to the location close to the Crouch and Roach Estuary SPA and Ramsar site.

⁸ Rochford District Council Habitats Regulations Assessment.

⁹ Traffic headed south to Southend and the Airport, west to Rochford/Ashingdon, Hockley, Rayleigh and beyond will all be required to head through Rochford Town Centre.

Location 4: North Ashingdon

SA Objective	Commentary	Score
1. Balanced communities	No significant effects identified.	0
2. Healthy and safe communities	No significant effects identified.	0
3. Housing		
4. Economy & employment	No significant effects identified.	0
5. Accessibility	Location is a significant distance from Town Centres, railway stations, employment and community facilities, so is unlikely to encourage sustainable transport.	-
6. Biodiversity	No significant effects identified.	0
7. Cultural Heritage	No significant effects identified.	0
8. Landscape & townscape	The Crouch and Roach Farmland Landscape Character (LCA) area lies to the north of Ashingdon, and is a more sensitive LCA than for locations to the south and west of Rochford.	?
9. Climate change & energy		
10. Water	No significant effects identified.	0
11. Land & Soil	Located on Grade 3 Agricultural land, so no significant impact identified.	0
12. Air Quality	No significant effects identified.	0
13. Sustainable Design &		

construction		
---------------------	--	--

Summary: No significant effects were identified for most SA objectives, however the location was found to have negative effects on accessibility, as it is located a significant distance from services and facilities, including employment opportunities. The location is also in a sensitive landscape area. No positive effects were identified.

Location 5: South East Ashingdon

SA Objective	Commentary	Score
1. Balanced communities	No significant effects identified.	0
2. Healthy and safe communities	No significant effects identified.	0
3. Housing		
4. Economy & employment	No significant effects identified.	0
5. Accessibility	Well located in relation to King Edmund Secondary School, and reasonable access to Rochford Town Centre for services and employment.	+
6. Biodiversity	No significant effects identified.	0
7. Cultural Heritage	No significant effects identified.	0
8. Landscape & townscape	Whilst it is within the Crouch and Roach Farmland Landscape Character (LCA) area (a more sensitive landscape area than Essex Coastal Towns Landscape Character Area) this location is better connected to the existing urban form than all other locations considered in the District. It will have a minimal effect on the green belt as there is already development of the North, south and west of the location, therefore it won't project out into	++

	open landscape. The effect on landscape is considered to be a major positive.	
9. Climate change & energy		
10. Water	No significant effects identified.	0
11. Land & Soil	Located on Grade 2 Agricultural land.	-
12. Air Quality	May further exacerbate Air Quality issues in Rochford Town Centre, as some traffic will need to travel through the Town Centre ¹⁰ , however this is less of an issue for this location, as north and west-bound traffic won't need to travel through Rochford Town Centre.	?
13. Sustainable Design & construction		

Summary: Positive effects were identified for accessibility and major positive effects for landscape (due to the location's good relationship with the existing urban form and lack of obvious incursion into the greenbelt). There is some potential to exacerbate air quality issues in Rochford Town Centre, however there are alternative routes to the west and north, so this is less likely than for locations further south.

Location 6: East Ashingdon

SA Objective	Commentary	Score
1. Balanced communities	No significant effects identified.	0
2. Healthy and safe communities	No significant effects identified.	0
3. Housing		

¹⁰ Traffic headed south to Southend and the Airport, west to Rochford/Ashingdon, Hockley, Rayleigh and beyond will all be required to head through Rochford Town Centre.

4. Economy & employment	No significant effects identified.	0
5. Accessibility	Well located in relation to King Edmund Secondary School and shops and services on Ashingdon Road. Good access to bus services on Ashingdon Road.	+
6. Biodiversity	No significant effects identified.	0
7. Cultural Heritage	No significant effects identified.	0
8. Landscape & townscape	The Crouch and Roach Farmland Landscape Character (LCA) area lies to the east of Ashingdon, and is a more sensitive LCA than for locations to the south and west of Rochford.	?
9. Climate change & energy		
10. Water	No significant effects identified.	0
11. Land & Soil	Located on Grade 2/3 Agricultural land.	-
12. Air Quality	May further exacerbate Air Quality issues in Rochford Town Centre, as some traffic will need to travel through the Town Centre ¹¹ , however this is less of an issue for this location, as north and west-bound traffic won't need to travel through Rochford Town Centre.	?
13. Sustainable Design & construction		

Summary: No significant constraints were identified at this location. It is reasonably well-located, close to shops, the secondary school, services and transport (bus) services in Ashingdon.

¹¹ Traffic headed south to Southend and the Airport, west to Rochford/Ashingdon, Hockley, Rayleigh and beyond will all be required to head through Rochford Town Centre.

Housing development options for Rayleigh:

Location 7: West Rayleigh (North of London Road, Rayleigh)

SA Objective	Commentary	Score
1. Balanced communities	The quantum of development that can be delivered in this location provides sufficient economies of scale to fund/develop facilities required by the community, including a primary school, public open space and other community facilities.	++
2. Healthy and safe communities	Location has potential for good links to Thames Gateway Greenway proposal 13, providing opportunities for recreation, also the potential for inclusion of a significant public park, creating a buffer to the A1245.	++
3. Housing		
4. Economy & employment	Location is within close proximity to Imperial Park Industrial Estate and the proposed employment area (office development) west of Rayleigh. There are potential opportunities to encourage mixed-use development at this location and to relocate businesses from Rawreth industrial estate. Well located to Basildon and Chelmsford for employment opportunities.	++
5. Accessibility	Location is a significant distance from Rayleigh Train Station and town centre, although the land area/development quantum is of sufficient size to encourage the enhancement of bus services (when combined with the proposed west Rayleigh employment area). A potential highway link between Rawreth Lane and London Road may provide more public transport opportunities.	+
6. Biodiversity	No significant effects identified.	0
7. Cultural Heritage	No significant effects identified.	0
8. Landscape & townscape	Within South Essex Coastal Towns Landscape Character Area. A development of the scale envisaged may be more prominent in this location due to the obvious extension into the green belt (and lack of defensible green belt boundaries). However it is noted that the Core Strategy is proposing a new green buffer to the west of this development.	-
9. Climate change & energy		

10. Water	Some areas within this location are within flood zone 3, however it is likely that development can be accommodated outside of the flood prone area.	?
11. Land & Soil	Located on Grade 3 Agricultural land-no significant impact identified.	0
12. Air Quality	<p>Development on this scale could exacerbate air quality in Rayleigh through increasing traffic (it is noted that Council is in the process of declaring an Air Quality Management Area (AQMA) at Eastwood Road and High Street Rayleigh). However, due to the relationship of Rayleigh to Basildon/Chelmsford, this location to the west will have less of an effect on air quality than locations located to the east and south (all traffic from the east and south will route through Rayleigh centre).</p> <p>Location also near Rawreth industrial estate AQMA, however this site is proposed for redevelopment (to less polluting employment land uses than present), so this is unlikely to be a concern.</p>	?
13. Sustainable Design & construction		

Summary: The size of the land available in this location, combined with proposals for an employment area at West Rayleigh create economies of scale that support new community and transport infrastructure. This wouldn't be possible at a number of alternative Rayleigh locations (due to coalescence and land ownership constraints). The location has good potential to connect with Thames Gateway Greenway proposal 13, enhancing health benefits. Negative effects on air quality were identified, due to existing air quality issues in Rayleigh Town Centre, however one of the benefits of this location is that traffic heading west and north to Basildon and Chelmsford would not need to travel through the centre of Rayleigh, hence minimising the effect of increased air pollution and congestion that is likely to result in developing to the east of Rayleigh.

Location 8: East Rayleigh

SA Objective	Commentary	Score
1. Balanced communities	It is not clear whether there is sufficient land available at this location to accommodate the proposed allocation for Rayleigh, given the constraint of the Upper Roach Valley recreation area.	?
2. Healthy and safe communities	Development is within close proximity to the Upper Roach Valley recreation area and Hockley Woods SSSI, therefore positive benefits for health. Potential to connect with Thames Gateway Greenway proposal 16. Potential health effects from increased air and noise pollution, as significant traffic likely to be routed through Rayleigh town centre.	+ + ?
3. Housing		
4. Economy & employment	This location is further from employment opportunities than a number of other locations in Rayleigh, although it may also benefit from closer access to Hockley.	+
5. Accessibility	The location is a similar distance to the town centre/ Railway station as location 7; however there may also be the opportunity to enhance public transport services, given the quantum of development possible. The railway line poses a constraint to access from the location, and much of the traffic from this location would consequently need to travel through Rayleigh Town Centre.	+ ?
6. Biodiversity	The location is close to Hockley Woods SSSI and its development has the potential for negative effects on the site through increasing recreational use and disturbance. Through increasing traffic on the B1013, there is also the potential for increased air pollution, which may negatively affect the SSSI. This is likely to be more of a concern for this location (than West Hockley, for example) due to the size of allocation required at Rayleigh.	?
7. Cultural Heritage	Development at this location will increase traffic flows through Rayleigh Conservation Area, with potential negative effects through increased pollution and noise disturbance.	?
8. Landscape & townscape	Development in this location could potentially infringe upon the Upper Roach Special Landscape Area (SLA). A smaller SLA (Hockley Woods) is to the south of this location and could be adversely affected by development. Significant development at this location also has greater	--

	potential to lead to coalescence of Rayleigh and Hockley.	
9. Climate change & energy		
10. Water	No significant effects identified.	0
11. Land & Soil	Located on Grade 3 Agricultural land-no significant impact identified.	0
12. Air Quality	Located on the south side of the railway line, development on this scale could exacerbate poor air quality in Rayleigh, as much of the traffic from this location would consequently need to travel through Rayleigh Town Centre. This would have a negative effect on the proposed Air Quality Management Area in Rayleigh.	-
13. Sustainable Design & construction		

Summary: The location has good potential to connect to existing green spaces and the green grid, enhancing health benefits. Negative effects on air quality were identified, due to existing air quality issues in Rayleigh Town Centre, and the requirement for traffic to route through the Town Centre, where there is already an Air Quality Management Area (AQMA).

A key issue identified for this location is its potential impact on special landscape areas and potential contribution towards the coalescence of Hockley and Rayleigh. Development also has the potential to impact adversely on the Hockley Woods SSSI and the Council has advised that the area of land available for development in this location may not be sufficient to achieve the quantum of development required in Rayleigh, without infringing on the Upper Roach Valley recreation area.

Location 9: South West Rayleigh

SA Objective	Commentary	Score
1. Balanced communities	The quantum of development that can be delivered in this location provides sufficient economies of scale to fund/develop facilities required by the community.	++
2. Healthy and safe communities	The location has access to open space areas to the South of Rayleigh. Potential health effects from increased air and noise pollution, if significant traffic routed through Rayleigh town centre.	+ ?
3. Housing		
4. Economy & employment	Location within proximity of Rayleigh town centre for employment opportunities and opportunities to contribute to the regeneration of the town centre	++
5. Accessibility	Location is within good proximity to Rayleigh Train Station and the services, employment and facilities available in Rayleigh Town centre. It is noted that there are Highways concerns around connecting the location to the A127.	+ ? +
6. Biodiversity	No significant effects identified.	0
7. Cultural Heritage	Development at this location will increase traffic flows through Rayleigh Conservation Area, with potential negative effects through increased pollution and noise disturbance.	?
8. Landscape & townscape	Development at this location is likely to have less of an effect on landscape than at other locations in Rayleigh as it is bound by the existing urban area, railway line and the A127.	0
9. Climate change & energy		
10. Water	No significant impact identified	0
11. Land & Soil	Located on grade 3 agricultural land. The location's steep topography may present difficulties.	-
12. Air Quality	Development at this location has the potential to exacerbate poor Air Quality (An AQMA is proposed for Rayleigh). No access to the A127 from this location, therefore traffic would be directed	-

	to the town centre.	
13. Sustainable Design & construction		

Summary: There are a number of positive benefits to development at this location, in particular its proximity to Rayleigh train station and town centre, allowing opportunities to contribute to the regeneration of the town centre. There are also landscape benefits, as this location is bound by the existing urban area, the railway line and the A127. However it is noted that Highways concerns have been raised, as there would be no direct access available to the A127, and traffic would therefore be routed through the town centre and the proposed AQMA. With the scale of development proposed for Rayleigh, this could have significant negative effects on air quality.

Location 10: North Rayleigh

SA Objective	Commentary	Score
1. Balanced communities	The quantum of land that can be delivered in this location provides sufficient economies of scale to fund/develop facilities required by the community, including a primary school, public open space and other community facilities.	++
2. Healthy and safe communities	Reasonable proximity to Upper Roach Valley recreation area.	+
3. Housing		
4. Economy & employment	Location is within good proximity to existing and proposed employment opportunities at West Rayleigh, although further from the town centre.	+
5. Accessibility	The location is further (than other Rayleigh locations) from Rayleigh Train Station and services available in the town centre.	0
6. Biodiversity	No significant effects identified.	0

7. Cultural Heritage	No significant effects identified.	0
8. Landscape & townscape	Within the South Essex Coastal Towns Landscape Character Area that is least sensitive to development. However, a development of the quantum envisaged for Rayleigh could have negative effects on local landscapes. Development may be more prominent in this location due to the obvious extension into the green belt (and lack of defensible green belt boundaries). Coalescence with Hullbridge is also a potential problem with this location.	-
9. Climate change & energy		
10. Water	No significant effects identified.	0
11. Land & Soil	Located on Grade 3 Agricultural land-no significant impact identified.	0
12. Air Quality	Development on this scale could exacerbate air quality in Rayleigh through increasing traffic. However, due to the relationship of Rayleigh to Basildon/Chelmsford, this location to the north will have less of an effect on air quality than locations to the east and south. Location also near Rawreth industrial estate AQMA, however this site is proposed for redevelopment (to less polluting employment landuses than present), so this is unlikely to be a concern.	?
13. Sustainable Design & construction		

Summary: This location doesn't perform as well in the sustainability appraisal as other Rayleigh locations - it is further from Town Centre services, will create an obvious extension into the green belt (with no defensible boundary), and has the potential to cause coalescence with Hullbridge. It also doesn't have the advantages of some of the other locations in terms of access to employment or recreational spaces. The call for sites exercise undertaken by the Council also indicated potential ownership issues with this location, therefore deliverability may be questionable.

Location 11: South /South East Rayleigh

SA Objective	Commentary	Score
1. Balanced communities	It is not clear whether there is sufficient land available at this location to accommodate the proposed allocation for Rayleigh, given the constraints of coalescence with settlements to the south.	?
2. Healthy and safe communities	Location has potential for good links to Thames Gateway Greenway proposal 16 and has potential to link to Upper Roach Valley Recreation Area. Good access to public open space areas south of Rayleigh. Potential health effects from increased air and noise pollution, if significant traffic routed through Rayleigh town centre.	+ + ?
3. Housing		
4. Economy & employment	Location close to Brook Road Industrial Estate, and employment opportunities to the south.	+
5. Accessibility	Much of this location is a similar distance to the town centre/ Railway station as the North of London Road and South West Rayleigh locations .	+
6. Biodiversity	No significant effects identified.	0
7. Cultural Heritage	Location is likely to direct traffic through Rayleigh Conservation Area and near Rayleigh Mount- increased air and noise pollution may have negative effects on the conservation setting.	?
8. Landscape & townscape	Within South Essex Coastal Towns Landscape Character Area. Further development at this location will lead to coalescence of Rayleigh with settlements to the south in Southend-on-Sea Borough.	-
9. Climate change & energy		
10. Water	Parts of this location are located within Flood Zone 3, potentially further reducing the footprint available for development.	?
11. Land & Soil	Located on Grade 3 Agricultural land-no significant impact identified.	0

12. Air Quality	Development on this scale could exacerbate air quality in Rayleigh through increasing traffic in the town centre.	-
13. Sustainable Design & construction		

Summary: Land to the south of Rayleigh is constrained by the A127, A1015 and existing development, including industrial development at Brook Road, as well as potential flooding issues. It therefore does not have the advantage of some of the other locations in terms of creating sufficient economies of scale to fund infrastructure and community services. Development in this location will also lead to coalescence between Rayleigh and settlements to the south.

Location 12: Rawreth village

SA Objective	Commentary	Score
1. Balanced communities	Development of the scale envisaged for the west of Rayleigh would have an adverse effect, through overwhelming the existing small village community.	-
2. Healthy and safe communities	No significant effect identified.	0
3. Housing		
4. Economy & employment	Minimal employment within the village, but it is located within proximity to Rayleigh and Wickford, and road links to employment centres at Chelmsford/Basildon. Development would promote economic opportunities for Rawreth village, but would overwhelm existing facilities (appraised under objective 1).	+
5. Accessibility	This location performs poorly on accessibility due to the small size of the settlement and lack of access to shops and services. Development at this location would be heavily car dependent. It is noted there is a train station at Battlesbridge which may be utilised by residents of a development, but this is unlikely to be within walking distance from a development at Rawreth and offers an infrequent service.	--

6. Biodiversity	No significant effects identified.	0
7. Cultural Heritage	No significant effects identified.	0
8. Landscape & townscape	Effects on landscape/townscape are likely to be more significant at this location as a housing development of any significant size would overwhelm the existing settlement. Development would need to occur in the open green belt, counter to the development strategy.	--
9. Climate change & energy		
10. Water	No significant effects identified.	0
11. Land & Soil	Location is within Grade 3 Agricultural land-no significant effect identified.	0
12. Air Quality	No significant effects identified.	0
13. Sustainable Design & construction		

Summary: Development of housing at the scale envisaged for Rayleigh at this location is likely to have major negative effects on the SA objectives relating to accessibility and landscape/townscape. Even if a smaller volume of housing were proposed, the location would be heavily car-reliant, with access to schools, shops and services requiring a drive to Rayleigh or Wickford. It is noted that the sustainability of a 'new town' was considered at the Issues and options stage and discounted. Development in this location would also have adverse effects on the greenbelt and could overwhelm the existing settlement and its historic buildings.

Housing development options for Hockley/Hawkwell:

Location 13: West Hockley

SA Objective	Commentary	Score	
1. Balanced communities	Some opportunity to enhance existing services, but not considered significant given the size of the allocation for Hockley (50 homes).	0	
2. Healthy and safe communities	Location well-situated in terms of access to recreational opportunities (Upper Roach Valley, including Hockley Woods and Cherry Orchard Country Park), and potential to link to Sustrans cycle route.	++	
3. Housing			
4. Economy & employment	Effects on economy not considered significant. Employment opportunities available in Hockley Centre and Rayleigh.	0	+
5. Accessibility	Well located for education facilities (Hockley primary school adjacent), town centre and rail and potential to link to Sustrans cycle route.	++	
6. Biodiversity	Hockley Woods SSSI is located in West Hockley vicinity. Development may increase recreational pressure on the SSSI and traffic on the B1013, which may increase air pollution in the vicinity, however the size of the allocation is unlikely to cause a significant effect. (Wooded areas are also located outside of the SSSI boundary and could be adversely affected by development in this location; however this can be avoided through careful site planning).	?	
7. Cultural Heritage	No significant effects identified.	0	
8. Landscape & townscape	Negative local landscape effects possible, due to a predominance of wooded landscape in the West Hockley vicinity. Development may result in vegetation removal. There are potential benefits to locating south of Railway line, as a defensible green belt boundary can be maintained.	?	+
9. Climate change & energy			

10. Water	No significant effects identified.	0
11. Land & Soil	Land in this vicinity is generally Grade 3 agricultural land or woodland. Assuming no development of woodland, impact would not be significant. There is also some brownfield land within this location that may come forward.	0
12. Air Quality	As above, will increase air pollution along B1013- with potential effects on biodiversity (this effect considered under biodiversity). No further significant effects identified.	0
13. Sustainable Design & construction		

Summary: There are a number of benefits to development at this location, including good accessibility to Hockley centre and primary school, and the ability to create a defensible green belt boundary. Whilst there is the potential for adverse effects on biodiversity/landscape due to the location close to the Hockley Woods SSSI and surrounding remnant woodland, an allocation of up to 50 homes (as proposed in the Core Strategy) could be accommodated without adverse effects.

Location 14: South Hawkwell

SA Objective	Commentary	Score	
1. Balanced communities	Some opportunity to enhance existing services, which may be considered significant given the size of the allocation for Hawkwell (175 homes).	?	
2. Healthy and safe communities	Location relates well to Sustrans cycle route.	+	
3. Housing			
4. Economy & employment	Hockley centre is reasonably close and location is proximal to London Southend Airport employment area. Provides an opportunity for regeneration/economic enhancement in Hawkwell.	0	+
5. Accessibility	Location is further from rail links and services in Hockley than the west Hockley location. Opportunities for sustainable transport links. Location relates well to Sustrans cycle route.	?	
6. Biodiversity	No significant impact identified.	0	
7. Cultural Heritage	No significant impact identified.	0	
8. Landscape & townscape	There is the potential to contain development within an existing built envelope without eroding the openness of the greenbelt, however there is also potential for loss of a wooded area.	+	?
9. Climate change & energy			
10. Water	No significant impact identified.	0	
11. Land & Soil	Land in this vicinity is generally Grade 3 agricultural land. No significant effects identified.	0	
12. Air Quality	No significant impact identified.	0	
13. Sustainable Design &			

construction		
---------------------	--	--

Summary: Development at this location provides an opportunity for regeneration and the meeting of local housing need in Hawkwell, without impacting adversely on either local landscape or the greenbelt. Accessibility to services and employment is not as good as for West Hockley, but Hockley centre is reasonably close and location is proximal to London Southend Airport employment area.

Location 15: North East Hockley (including North Hockley)

SA Objective	Commentary	Score	
1. Balanced communities	Some opportunity to enhance existing services, but not considered significant given the scale of existing settlement.	0	
2. Healthy and safe communities	No significant effects identified.	0	
3. Housing			
4. Economy & employment	Employment opportunities available in Hockley Centre. Unlikely to have significant economic effects.	+	
5. Accessibility	North east Hockley location is a similar distance from rail links and services in Hockley as the west Hockley location, however North Hockley is further. Road access to Southend may be problematic, as traffic would need to travel through Hockley centre or Ashingdon road.	+	?
6. Biodiversity	Woodland areas to the North of Hockley may be adversely affected, although it may be possible to accommodate without negative effects on biodiversity.	?	
7. Cultural Heritage	No significant effects identified.	0	
8. Landscape & townscape	Development in this location does not provide opportunities for defensible green belt boundaries, however given the small size of the allocation, significant effects are unlikely.	?	
9. Climate change & energy			

10. Water	No significant effects identified.	0
11. Land & Soil	Land in this vicinity is generally Grade 3 agricultural land. No significant effects identified.	0
12. Air Quality	No significant effects identified.	0
13. Sustainable Design & Construction		

Summary: The appraisal shows that generally development in this location would be acceptable, however the location doesn't have the advantages of the other 2 Hockley/Hawkwell locations in providing an opportunity for a defensible green belt, it also poses potential highways accessibility issues, therefore the other locations may be preferred from this perspective.

Housing development options for Hullbridge:

Location 16: South West Hullbridge

SA Objective	Commentary	Score	
1. Balanced communities	Development of 250-500 homes at this location will help to sustain the existing community and will support existing community services.	+	
2. Healthy and safe communities	Located close to Sustrans cycle route and facilities available in and around Hullbridge.	+	
3. Housing			
4. Economy & employment	No significant effect for employment as there is limited employment available in Hullbridge, but settlement is close to other centres of employment. Positive effects for economy as development will help to support existing retail and services in Hullbridge.	0	+
5. Accessibility	Housing development at Hullbridge won't benefit from the same access to services and employment as development in Rayleigh, Hockley and Rochford/Ashingdon, however it is recognised that there is housing need in Hullbridge. Development to the South West of the existing village will place new housing within close proximity to existing shops, the primary school and transport links in Hullbridge village centre.	-	+
6. Biodiversity	Impacts on the Crouch and Roach Estuary SAC, including recreational impacts will need to be considered in further detail at site allocations stage (through the HRA of the Site Allocations document), although effects are considered unlikely if development is located in South West of settlement, away from the estuary.	?	
7. Cultural Heritage	Potential impacts on local archaeology- would need to be subject to survey at more detailed stages of development.	?	
8. Landscape & townscape	Development is likely to have local landscape effects, and is located within the more sensitive Crouch and Roach Farmland landscape character area. The cumulative effect of up to a further 500 homes may further contribute to this effect. Impacts should be further considered at site allocations stage.	?	
9. Climate change & energy			

10. Water	No significant effects identified.	0
11. Land & Soil	Location is within Grade 3 Agricultural land-no significant impact identified.	0
12. Air Quality	Potential impact on Lower road junction- air quality and congestion effects.	?
13. Sustainable Design & Construction		

Summary: Whilst Hullbridge is not as well located in terms of access to employment and services as Rayleigh, Hockley and Rochford/Ashingdon, development at the settlement will help to meet the villages housing requirements. Development to the south west of the village is supported by the sustainability appraisal as it will place new housing within close proximity to existing shops, the primary school, transport links in Hullbridge Village Centre and links to Basildon/Chelmsford/Rayleigh and where effects on landscape will be minimised. Effects on biodiversity (specifically the Crouch estuary) are unlikely at this location, but should be considered in the Habitats Regulations Assessment of the Site Allocations document.

Housing development options for Canewdon:

Location 17: South Canewdon

SA Objective	Commentary	Score	
1. Balanced communities	Development of 60 homes at this location is likely to help sustain the existing community and support existing community services.	+	
2. Healthy and safe communities	No significant effects identified.	0	
3. Housing			
4. Economy & employment	<p>Negative effects for employment as there is limited employment available in Canewdon itself- residents would mostly need to travel to other centres (Rochford, Rayleigh, Southend-on-Sea) to work.</p> <p>However, positive effects are likely for the local economy as development will help to support existing retail and services in Canewdon.</p>	-	+
5. Accessibility	<p>The location (South of Canewdon) has good access to local shops and services and Canewdon Primary school, also to Ashingdon however access to employment and wider services will require travel to Rochford/ Hockley.</p> <p>A location in South Canewdon will help direct traffic away from the narrow centre.</p>	-	+
6. Biodiversity	No significant effects identified.	0	
7. Cultural Heritage	No significant effects identified.	0	
8. Landscape & townscape	Development of this scale (60 homes) is likely to have local landscape effects; however there is potential to minimise any effects through choosing a site where a defensible green belt boundary can be created. Location is within the more sensitive Crouch and Roach Farmland landscape character area.	?	
9. Climate change & energy			

10. Water	No significant effects identified.	0
11. Land & Soil	Located on Grade 3 Agricultural land-no significant impact identified.	0
12. Air Quality	No significant effects identified.	0
13. Sustainable Design & Construction		

Summary: Canewdon is not as well located in terms of access to employment and services, when compared with the larger villages of Hullbridge and Great Wakering. However, new housing development at the settlement will help to meet the village's housing requirements. It will also support existing services and support the viability of the community. Within the settlement, south Canewdon is considered an appropriate development location, with good access to local services and the primary school - it will also divert traffic away from the narrow centre of the village.

Housing development options for Great Wakering:

Location 18: West Great Wakering

SA Objective	Commentary	Score
1. Balanced communities	Development of 250 homes at this location is likely to help sustain the existing community and will support existing community services.	+
2. Healthy and safe communities	Some local facilities available, including the local leisure centre.	+
3. Housing		
4. Economy & employment	Housing development in this location will help to support existing retail and services in Great Wakering. The location is also close to employment opportunities in Southend-on Sea and Shoeburyness.	+
5. Accessibility	Whilst Great Wakering is further from Rochford Districts main settlements to the west, it is in good proximity to employment, services and retail located at Shoeburyness and Southend-on – Sea. Local retail services and sports facilities are available within walking/cycling distance in Great Wakering.	+
6. Biodiversity	Great Wakering is within proximity to sites of European nature conservation importance (The Crouch and Roach SPA/Ramsar site and Foulness SPA/Ramsar site), however given the scale of development and distance involved, negative effects are considered unlikely. This will be considered in further detail in the HRA of the Site Allocations document.	?
7. Cultural Heritage	No significant effects identified.	0
8. Landscape & townscape	Some local effects on landscape/townscape possible, depending on site/s chosen for development, although location within less sensitive South Essex Coastal Towns landscape area. Development should be connected well to the existing settlement, so as to avoid coalescence with Shoeburyness.	?
9. Climate change & energy		

10. Water	No significant effects identified.	0
11. Land & Soil	Location is within Grade 3 Agricultural land-no significant impact identified.	0
12. Air Quality	No significant effects identified.	0
13. Sustainable Design & Construction		

Summary: Housing development in this location will help support housing need in the east of the District and will also help to support the viability of the existing settlement, including community services. The location is well-placed to benefit from employment opportunities and services at Southend-on Sea/Shoeburyness. There is some potential for increased pressures on European designated habitats through increasing the population in this area, however given the relatively small scale of development (250 homes) this is considered unlikely. Development at this location should also avoid coalescence with Shoeburyness through ensuring the chosen sites are well connected to Great Wakering.

Appendix 2- Detailed appraisal matrices (employment development locations)

Options for employment sites:

Location E1: London Southend Airport

SA Objective	Commentary	Score
1. Balanced communities	The development of the London Southend Airport employment area is likely to have positive economic flow-on effects for the town of Rochford.	+
2. Healthy and safe communities	Opportunities to link to the Cherry Orchard Jubilee Country Park on the west side of Cherry Orchard Way.	+
3. Housing		
4. Economy & employment	The co-location of employment land with existing development at the airport site will help to create a strong regional driver for employment development.	++
5. Accessibility	The location has excellent access to public transport services, in particular it is well-located to Rochford train station. It is also located adjacent to Southend Airport Railway station. There are also opportunities to improve walking and cycling routes and buses, through integrating with the South Essex Rapid Transport (SERT) proposals and pedestrian/cycle links with development to the west of Rochford.	++
6. Biodiversity	Effects on biodiversity are being addressed through the Joint Area Action Plan and site-level appraisal, however no significant strategic-level constraints have been identified.	0
7. Cultural Heritage	No significant effects identified	0
8. Landscape & townscape	Located within South Essex Coastal Towns landscape Character Area, and surrounding an existing airport/industrial location, however development of this scale will have an impact on the surrounding landscape. Mitigation (green corridors, buffers etc) will be required.	-
9. Climate change & energy		
10. Water	Employment land can be large users of water. Rochford treatment works are at capacity, so augmentation of existing services is likely to be required. There are areas of flood risk within this location, but it is	?

	considered that development can avoid these areas.	
11. Land & Soil	Much of the location is non-agricultural land, however there is also Grade 1 agricultural land in the vicinity. Employment development of this scale is likely to include loss of agricultural land.	-
12. Air Quality	Development of this scale may have some adverse effects, especially during construction and this should be considered through appropriate phasing and development management.	?
13. Sustainable Design & construction		

Summary: The co-location of further employment development with London Southend Airport provides positive benefits for communities, economic development and employment. The accessibility of the location by public transport is excellent, and due to its co-location with existing development, there are opportunities to enhance green links and buffers to help minimise the adverse effects of a development of this scale.

Location E2: West Rayleigh

SA Objective	Commentary	Score
1. Balanced communities	The development of an employment area at West Rayleigh is likely to have positive economic flow-on effects for the town of Rayleigh.	+
2. Healthy and safe communities	Location has potential for good links to Thames Gateway Greenway proposal 13, providing opportunities for recreation,	+
3. Housing		
4. Economy & employment	The development of employment land in this location will help improve employment opportunities for the west of Rochford District and improve Rayleigh's economy.	+
5. Accessibility	Location is a significant distance from Rayleigh Train Station and town centre, although the land area/development quantum is of sufficient size to encourage the development of bus services/ SERT (when combined with the proposed west Rayleigh housing development). Good access to strategic highways.	+

6. Biodiversity	No significant effects identified.	0
7. Cultural Heritage	No significant effects identified.	0
8. Landscape & townscape	Located within South Essex Coastal Towns landscape Character Area, which is less sensitive than other landscape areas, however development of this scale will have an impact on the surrounding landscape. Mitigation (green corridors, buffers etc) would be required.	-
9. Climate change & energy		
10. Water	Some areas within this location are within flood zone 3, however it is likely that development can be accommodated for outside of the flood prone area.	?
11. Land & Soil	Land is predominantly grade 3 agricultural land. There is some opportunity for use of brown field land.	0
12. Air Quality	Depending on phasing, development in this location could exacerbate the Existing Air Quality Management Area (AQMA) at Rawreth Industrial estate (Council are seeking alternative uses for this site to replace the existing polluting industries- this would render the AQMA redundant). However positive for Rayleigh Town centre, as most traffic won't travel through the centre.	?
13. Sustainable Design & construction		

Summary: No significant negative effects were identified in developing this location for employment land. The co-location of this location for development with proposed residential land at West Rayleigh (north of London Road) would further enhance positive effects for accessibility through encouraging a mix of uses neighbouring each other. This will help to encourage sustainable transport through allowing residents the opportunity to walk and cycle to work. It would also provide further opportunities for enhanced green spaces and services (especially bus services) through increasing developer funding and improving viability through increased patronage of services.

Location E3: South Rochford (east of Airport)

SA Objective	Commentary	Score
1. Balanced communities	The development of this location as an employment area is likely to have positive economic flow-on effects for the town of Rochford.	+
2. Healthy and safe communities	Location has potential for good links to Thames Gateway Greenway proposal 18.	+
3. Housing		
4. Economy & employment	The development of employment land in this location will help improve employment opportunities in Rochford District and improve Rochford's economy. The location of employment land near to existing development at the nearby airport site will help to create a strong regional driver for employment development.	++
5. Accessibility	The location performs similarly to the London Southend airport site, however access to the airport is more difficult due to the presence of the railway line.	++
6. Biodiversity	No significant effects identified.	0
7. Cultural Heritage	No significant effects identified.	0
8. Landscape & townscape	The Crouch and Roach Farmland Landscape Character (LCA) area lies to the east of Rochford, and is a more sensitive LCA than for locations to the south and west of Rochford. Development of the scale envisaged likely to have an adverse effect on landscape, as with the other locations. Additionally, development of this site will lead to further negative effects through coalescence with settlements in Southend on Sea.	--
9. Climate change & energy		
10. Water	Employment land can be large users of water. Rochford treatment works are at capacity, so augmentation of existing services is likely to be required.	?
11. Land & Soil	Located on grade 1 agricultural land.	-

12. Air Quality	Could further exacerbate Air Quality issues in Rochford Town Centre through increasing through traffic. Uncertain effect.	?
13. Sustainable Design & construction		

Summary: This location performs similarly to the London Southend Airport location, however it does not benefit from the same synergies and opportunities as the Airport site, being located further from the existing airport and severed from the site by the railway line. Additionally, development of this location is likely to lead to major negative effects on landscape through contributing to coalescence with Southend-On-Sea.

Appendix 3- Summary and responses to Addendum report June 2011

Issues Raised in relation to the Core Strategy SA Addendum.	Comments on Issues Raised	Changes made to SA Addendum
An analysis of the consultation results on the Allocations Discussion and Consultation Document has not been made / considered. Results of the consultation have not been made public.	Responses to consultation on the Allocations Discussion and Consultation Document are publicly available to view. The responses relate to individual sites rather than general development locations and will be considered in the progression of individual sites through the allocations DPD process. A separate SA of that DPD will be undertaken.	None
Allocations DPD has been referred to in the SA Addendum and as such the consultation results are relevant to the SA Addendum.	The Allocations DPD is only referred to in the Core Strategy SA Addendum in so far as the evidence base documents that were used in the drafting of the Discussion and Consultation Document, namely the SHLAA and Call for Sites, provide evidence that can be used for the SA Addendum. As noted above, a separate SA of the Site Allocations DPD will be undertaken.	None
The SA Addendum does not include a comparative assessment of all the Core Strategy general location, and cumulative impacts are not considered.	Sustainability Appraisal is an iterative process and the SA Addendum should be read in conjunction with the previous SA work on the Core Strategy. The appraisal of options in the SA involved a hierarchical approach – options relating to housing distribution between the settlements were previously appraised. This SA Addendum has therefore considered the approach to general	Role of previous SAs and iterations of the Core Strategy are explained in para 1.4 and 1.6 of Addendum.

	locations within each settlement.	
The SA Review provides insufficient evidence to justify use of best and most versatile agricultural land for development.	The SA Review considers the Agricultural Land Classification of general locations- this is commonly used in planning and SA as an indicator of agricultural land quality.	None
The SA Review does not consider surface water flooding.	<p>Policies to mitigate surface water flooding are included within the Core Strategy and apply to development in all locations.</p> <p>Government guidance¹² notes that new development should include appropriate surface water arrangements to manage impact. The Core Strategy includes policies to ensure this. These policies have been appraised through the SA process.</p>	None
The SA Review does not consider impact on highways.	The SA objectives, and decision-aiding questions, were agreed with Natural England, Environment Agency and English Heritage earlier in the SA process as being the appropriate objectives for the SA to consider. Direct impact on the highway network is an issue which has been addressed separately with the Highways Authority, however consideration has been given to related issues of air pollution, congestion and accessibility under the relevant SA objectives.	None

¹² Planning Policy Statement 25: Development and Flood Risk

<p>The consultation is inappropriate as the Council stated that comments should only be made on the SA Addendum, and this meant that the SA as a whole could not be reviewed.</p>	<p>The consultation is on the SA Addendum which is an addendum to SA work that has previously already been considered through the consultation and examination process.</p>	<p>None</p>
<p>Individual sites were viewed by the LDF Sub-Committee but not assessed in detail. The LDF Sub-Committee is not open and transparent.</p>	<p>The SA Addendum does not consider individual sites.</p> <p>The general locations considered in the SA Addendum are those that were considered and assessed through the Core Strategy Revised Preferred Options Document.</p> <p>This document was reviewed and approved for consultation by the LDF Sub-Committee at a public meeting.</p>	<p>None</p>
<p>The SA process is not robust as it was carried out in separate work streams by Essex County Council and Enfusion.</p>	<p>Essex County Council undertook work on earlier iterations of the Core Strategy SA. Enfusion built upon this earlier work to produce SA for the latter stages. This in no way undermines the robustness of the SA process.</p>	<p>None</p>
<p>This document does not seem to cover all sites referred to within the Submission Core Strategy.</p>	<p>The general locations considered in the SA Addendum are those that were considered and assessed through the Core Strategy Revised Preferred Options Document. This includes the preferred general locations for Green Belt release and reasonable alternatives to these.</p>	<p>None</p>

<p>The Sequential Test set out in Core Strategy Topic Paper 1 does not adequately justify the need for development within Flood Zone 3 at Stambridge Mills. The document states that the SHLAA notes that 'there are adequate areas of green belt that have the potential to deliver housing that are in lower areas of flood risk than Stambridge Mills'. Policy H2 makes it clear that Green Belt land will be released for housing development to meet the districts needs. Therefore Stambridge Mills site, in Flood Zone 3, cannot be justified solely on the basis that Green Belt land, in Flood Zone 1, is inappropriate for housing.</p>	<p>Topic Paper 1 has been considered in its own right as part of the Core Strategy examination.</p> <p>Stambridge Mills is included within the strategic policy of utilising brownfield land before Green Belt land (Policy H1). This policy approach is considered to have been adequately assessed.</p> <p>In the inspectors report for the appeal hearing for application Ref 09/00529/OUT paragraph 2.36 states that: "I agree with the Council that, having regard to the presumption against inappropriate development in PPG 2 and to the encouragement in PPS 3 to direct new housing to previously-developed land, land in the Green Belt should not be considered to be suitable for housing development in preference to Stambridge Mills (153-158)."¹³</p> <p>Furthermore in the Inspector's report into the soundness of the London Borough of Barking and Dagenham Core Strategy paragraph 5.4 states that "Following on from this work, and in accordance with the guidance in PPS25, the Council prepared its 'Sequential and Exception Tests of the Key Regeneration Areas in the Core Strategy' (June 2009). This study found that as there are no suitable alternative sites in areas of</p>	<p>None</p>
---	--	-------------

¹³ http://www.rochford.gov.uk/pdf/planning_appeal_rectoryroad_inspectorsreport.pdf

¹⁴ <http://www.lbbd.gov.uk/Environment/Documents/LDF/inspectors-report.pdf>

	<p>lower flood risk in the LBBD that can accommodate the quantity of development required by the LP the sequential test is satisfied. The study also concluded that as the development on the key regeneration sites would provide wider sustainability benefits that outweigh flood risk and is located on previously developed land the first two elements of the exception test are also passed. It is then up to the developer to demonstrate that the third element of the exception test, namely that the development will be safe without increasing flood risk elsewhere and where possible reducing flood risk overall, is passed." ¹⁴ This Core Strategy was subsequently found to be sound.</p>	
<p>The Stambridge Mills site has not been included within Section 3 of the SA Addendum. It should be included and should justify the need for development here.</p>	<p>As above, Stambridge Mills is a brownfield site which is considered to have been adequately assessed as part of strategic policy H1 of the Core Strategy Submission Document.</p>	<p>None</p>
<p>There is no mention of Stambridge Mills within Section 4, and the reasons why it is now no longer viable as an employment site.</p>	<p>As above, Stambridge Mills is a brownfield site which is considered to have been adequately assessed as part of strategic policy H1 of the Core Strategy Submission Document.</p>	<p>None</p>
<p>It is not considered that a full, transparent assessment has been made in respect of employment land options. Lubbarbs Lodge Farm has not been considered in the assessment. The allocation of this site</p>	<p>The Core Strategy does not allocate specific sites. The Core Strategy policy promotes the development of land west of Rayleigh for employment. As such, it does not preclude sites</p>	<p>Table 4.1 further explains why the release of Green Belt land for employment use within alternative locations to those identified within the SA Addendum is not</p>

<p>would take pressure off green field release at London Road whilst maintaining all of the benefits of being located west of Rayleigh.</p>	<p>that are commensurate with the general location of west of Rayleigh from being allocated for employment through the Allocations Development Plan Document.</p> <p>There is evidence that the release of Green Belt land is justified in West Rayleigh and around London Southend Airport, but not elsewhere within the District. As such release in alternative areas is not considered a realistic option, and the SA should only considered realistic options. The SA Addendum already explains why North Ashingdon and Wallasea Island are not considered realistic alternatives for this reason. The SA Addendum could explain this in further detail. .</p>	<p>considered a realistic alternative.</p>
<p>The SA is flawed as it has not considered the findings of the planning application at Coombes Farm (09/00528/OUT).</p> <p>A number of issues are raised in the SA Addendum regarding the general location of East Rochford, which were not applicable to the site of Coombes Farm and were not cited in the reason for refusal for the Coombes Farm planning application. These include:</p> <ul style="list-style-type: none"> • Reference to the location of development in the flight path of London Southend Airport in the context of the findings of the Coombes Farm application; 	<p>The Core Strategy is concerned with general locations, not specific sites. The issues raised within the SA Addendum are relevant to the general location of East Rochford, regardless of whether or not they may be directly applicable to a particular planning application.</p> <p>The SA Addendum considers issues in respect of the general location of East Rochford (for example noise pollution and impact of traffic) which, whilst they may not necessarily be of such harm to warrant refusal of a planning application are considered of relevance to a strategic level appraisal, and may help to differentiate between alternative locations for development.</p>	

<ul style="list-style-type: none"> • Reference to noise and air pollution; • Reference to increased traffic congestion in Rochford Town Centre; • Reference to the Crouch and Roach SPA and Ramsar site due to recreational disturbance in the context of the findings of the Coombes Farm application; • Reference to the effect on the landscape character; • Reference to the grade 1 agricultural land. 		
<p>The fact that the SA Addendum is required to be produced demonstrates that the SA was flawed.</p>	<p>This is not the case. The SA Addendum was produced in response to the judgment in the Forest Heath case which provided new case law. The Forest Heath High Court ruling and recommendations by DCLG in its report on the effectiveness of SEA and SA have clarified and provided an additional interpretation of the EU SEA Directive. The Addendum is in addition to the originally submitted SA, and does not mean that this was "flawed". SA is an iterative and ongoing process and will not be completed until the final plan is adopted and Sustainability Statement issued.</p>	<p>None</p>
<p>The SA Addendum fails to clarify when the reasonable alternatives were considered or when the selection/rejection process was undertaken. It is therefore difficult to</p>	<p>The general location of East Rochford was considered through the SA Addendum using accurate and pertinent data and information.</p>	<p>None</p>

<p>determine precisely when the Council became aware of a number of material changes of circumstance regarding East Rochford as a general housing growth location.</p> <p>A material change of circumstances occurred during the production of the Core Strategy that should have resulted in reassessment of East Rochford as a reasonable alternative.</p>		
<p>The SA Addendum is inconsistent. Example of inconsistency include:</p> <ol style="list-style-type: none"> 1. The assessment of Location 3 states that 'Whilst a small quantum of development may be accommodated within this general location avoiding land subject to physical constraints, such an approach is less likely to deliver community benefits', yet the assessment of Location 3 in Appendix 1 of the SA Addendum states that the 'quantum of development that can be delivered in this [East Rochford] location provides sufficient economies of scale to fund/develop facilities required by the community' and goes on to state that it 'Would also contribute to regeneration in Rochford'. This demonstrates the lack of 	<p>Taking each of the examples in turn:</p> <ol style="list-style-type: none"> 1. The statement in Appendix 1 regarding Location 3 that "the quantum of development that can be delivered in this location provides sufficient economies of scale to fund/develop facilities required by the community. ...would also contribute to regeneration in Rochford" is made against the SA objective pertaining to Balanced Communities. This objective does not consider other issues such as environmental constraints. Table 3 brings all of the findings against various SA objectives together, including those relating to social , economic and environmental issues, as well as wider planning and feasibility considerations. As such there is no lack of consistency. On the contrary, when the whole of the assessment of Location 3 in Appendix 1, it is clear that the conclusions in Table 3 are entirely consistent with this assessment. 	<p>Taking each of the examples in turn:</p> <ol style="list-style-type: none"> 1. None 2. Addendum further clarifies the importance of Landscape Character Areas (para 1.6), and clarifies the relevance of these in respect of Location 5 and the benefit of development not projecting out into the open countryside. 3. Addendum further clarifies that the relationship of Location 1 to King Edmund School was not one of the reasons why this location was selected (Table 3.1) 4. None 5. None

<p>consistency in the SA Addendum.</p> <p>2. Reference is made under the assessment of Location 5 to enabling 'a significant amount of development to be accommodated in a manner which does not entail development projecting out into the open countryside'. This is a subjective statement that is not applied to the assessment of the other locations, most notably to Location 1, which would involve a very significant incursion into the open countryside.</p> <p>3. Under the assessment of Locations 5 and 6 reference is made to their relationship to King Edmund School as a benefit of the proposed locations. Reference is then made to the relationship of Locations 2, 3 and 4 in delivering improvements to King Edmund School and community benefits similar to South East and East Ashingdon, yet there is no reference in the assessment of Location 1 to the contribution it will make to the improvements to King Edmund School and community benefits similar to South East and East Ashingdon</p>	<p>2. The reason why Location 5 is considered to be capable of accommodating a significant quantum of development without projecting into the open countryside is explained within its assessment in Appendix 1. The reason why this issue is noted for this location is that this location is within the Dengie and Foulness Coastal Landscape Character Area – a Landscape Character Area which is more sensitive to urban extensions than the South Essex Coastal Towns Landscape Character Area, in which Location 1 is situated.</p> <p>3. Table 3.1 summarises why certain locations were selected or rejected (which may include other reasons outside of the SA process). The assessments contained in Appendix 1 for these locations are consistent in terms of their treatment of this issue.</p> <p>4. The Core Strategy is concerned with general locations, not specific sites. The issues raised within the SA Addendum are relevant to the general location of East Rochford, regardless of whether or not they may be directly applicable to a particular planning application. The SA Addendum raises issues in respect of the general location of East Rochford (for</p>	
---	--	--

<p>4. The assessment of Location 3 refers to matters relating to highways and transport as counting against the location, yet the planning application at Coombes Farm clearly established that there was no objection from the statutory highway authority nor were there any highways matters of sufficient concern to warrant refusal of the development.</p> <p>5. The sustainability of Location 3 is assessed against West Rochford (Location 1), which is a fundamental error that results in the exclusion of Location 3 without proper consideration against all the other options for housing development</p>	<p>example noise pollution and impact of traffic) which, whilst they may not necessarily warrant refusal of a planning application are of strategic concern and may help to differentiate between alternative sites for development.</p> <p>5. The appraisal of options in the SA involved a hierarchical approach – options relating to housing distribution between the settlements were previously appraised. This SA Addendum has therefore considered the approach to general locations within each settlement.</p>	
<p>The assessment of South Rochford (east of Airport) states that it 'could include the expansion of the existing industrial estate (Purdey's), but the release of additional Green Belt land in this location is not supported by the Employment Land Study'. This appears to differ from the view in paragraph 11.32 of the Submission CS and in several locations in the Employment Land Review, which confirm that Purdey's Industrial Estate 'is a fit-for-purpose</p>	<p>The Employment Land Study identifying an existing site which should be maintained and expanded if possible is fundamentally different from identifying a location which, in strategic terms, warrants release of Green Belt in order to meet future employment needs.</p>	<p>None</p>

<p>industrial estate which is in a good condition. The site should be maintained and, if possible, expanded'.</p>		
<p>Election leaflets may have provided inaccurate information, which has misled consultees on the Core Strategy SA Addendum.</p>	<p>The consultation is on the Core Strategy SA Addendum, seeking views on this document. Information within independent documentation, such as election leaflets, is irrelevant to the consultation.</p>	<p>None</p>
<p>Greater consideration should have been given to smaller areas dotted throughout the District and not rejected in the SA. Such an approach would have enabled new development to utilise existing infrastructure, including transport infrastructure, as well as enabling greater community cohesion.</p>	<p>A wider distribution of housing was considered in earlier iterations of the Core Strategy and assessed through Sustainability Appraisal.</p>	<p>None</p>
<p>Prospects of coalescence between Hawkwell/Hockley and Rochford do not seem to have been addressed or the impact considered. Insufficient consideration has been given to the issue of coalescence.</p>	<p>Disagree. The Core Strategy SA Addendum considers the issue of coalescence where relevant under the landscape and townscape SA objective.</p>	<p>None</p>
<p>The SA actually recommends a new bus service. This is not deliverable.</p>	<p>The SA does not recommend a new bus service.</p>	<p>None</p>
<p>Social, environmental and economic factors have not been addressed and the proposals are not sustainable</p>	<p>The Core Strategy SA and Addendum considers social, economic and environmental issues agreed with Natural England, Environment Agency and</p>	<p>Origin of objectives now clarified within SA Addendum (para 1.5).</p>

	English Heritage earlier in the SA process.	
The SA report details how alternatives were considered throughout the production of the plan and sets out the reasons for selecting or rejecting those alternatives. When reading through the document it is evident that these documented considerations were not implemented in the final version of the Core Strategy.	Disagree, such decisions were implemented in the final version of the Core Strategy.	None
A decision not to relax the greenbelt policy was made but a decision to use greenbelt for employment land / housing was agreed at the same time. This evidences a contradiction in the SA.	The SA is supportive of an approach in which a small proportion of land is released for employment / housing where identified need is established, and restrictive Green Belt policies remain in place for land to which the Green Belt allocation still applies. This does not represent a contradiction in the SA.	None
An early version of the Core Strategy (the issues and options) considered and appraised two different options for Gypsies and Travellers sites. One was "No Gypsy or Traveller Site to be identified in the green belt" (A). The other was "Accommodation needs for Gypsy and Travellers will be met by identifying in an existing residential area for a site and formally specifying it in the Allocations DPD" (B)	The Core Strategy does not specify Gypsy and Traveller sites will be allocated on land that is presently Green Belt, although it does not rule this out - this is entirely consistent with the findings of the SA in which the option that entailed no sites to be identified in the Green Belt was found to have fewer positives.	None

<p>It is stated that option B will have a greater amount of positive effects than option A</p> <p>All the proposed Gypsy and Traveller sites identified and proposed in the CS within Rawreth and western Rayleigh are all within the greenbelt so, again, it demonstrates that although a decision was made stating that option B was the preferred option the decision has been ignored in the final CS document.</p>		
<p>In the call for sites, sites that could be considered as rural exceptions were put forward but dismissed.</p>	<p>The Core Strategy does not consider individual sites, including rural exception sites.</p>	<p>None</p>
<p>Sites were not included in the Core Strategy due to concerns over ownership. Compulsory purchase could be used to overcome ownership issues, therefore this is not a valid reason for failing to include sites.</p>	<p>The Core Strategy did not consider specific sites.</p> <p>The Strategic Housing Land Availability Assessment rightly considers ownership in determining deliverability, and identifies that deliverable sites are available in identified Core Strategy locations. General locations have not been discounted on the grounds of ownership.</p>	<p>None</p>
<p>The options regarding community leisure and tourism facilities were considered at the Issues and Options stage, and it was agreed that options A and elements of D</p>	<p>These options were considered at an early iteration of the Core Strategy, and the final leisure and tourism policies have been formulated having regard to the need to provide a balance</p>	<p>None</p>

<p>would be taken forward, A being to protect the greenbelt without providing any further guidance leaving it up to central government in its review of planning policy Guidance Note 2 and D being to provide a policy dealing with community, leisure and tourism proposals which will provide clarity for developments particularly in the greenbelt.</p>	<p>between providing such facilities and the need to maintain the openness of the Green Belt.</p>	
<p>What evidence has been provided to support the statement that detailed appraisals of housings locations were undertaken? We are aware that the vehicle transporting the appropriate members stopped at a gateway to Hambro Nursery, Rawreth on their viewing of "Call for Sites" tour for only a few moments.</p>	<p>The "Call for Sites tour" formed a very small part of the process, and was not part of the detailed assessment of sites per se. Nevertheless, it is pertinent to point out that the statement "the vehicle transporting the appropriate members stopped at a gateway to Hambro Nursery on their viewing of "Call for Sites" tour for only a few moments" is not an accurate description of the tour in relation to Rawreth.</p> <p>The evidence base for the Core Strategy comprises numerous documents. Those of particular relevance to the housing distribution assessment include Sustainability Appraisals (incorporating Strategic Environmental Information Baseline Profile). Further information on key documents in the consideration of the housing distribution is available through the document</p>	<p>None</p>

	entitled <i>Core Strategy General Housing Locations - Audit Trail</i> . ¹⁵	
The majority of the land to the North of London Road is within the Parish of Rawreth and not West Rayleigh as has always been stated in the CS. The proposed employment areas are also within the Parish of Rawreth.	The position of political boundaries is not relevant to the sustainability or otherwise of a location for development. General locations are referenced in the Core Strategy by functional ("real-life") geographies.	None
The SA process is not clear and transparent.	The SA is an assessment of the environmental, economic and social impact of proposed options and policies which has been undertaken and available for public comment at each stage of the Core Strategy. This document forms part of the evidence base.	None
The LDF process is not transparent.	Community involvement has been at the forefront of the development of the Core Strategy, (the main document of the LDF), and has been undertaken at each stage. At the revised Preferred Options stage, for example, a section was included explaining how peoples comments had shaped the revised document, and at the Submission stage a comprehensive Consultation Statement was produced outlining how the peoples comments and concerns had been fed into the process.	None

¹⁵ http://www.rochford.gov.uk/pdf/corestrat_add_audit.pdf

There is no comparative, objective assessment in terms of water, Green Belt, landscape and transport.	Please refer to the appraisals under the following SA objectives: 10. Water and 8. Landscape & townscape.	
The housing allocation is simply a figure and not based on need / demand.	The housing allocation for the District is based on meeting demand and need, whilst balancing constraints.	None
There is concern about who employment development is for.	The Council's strategy for employment development is set out in the Core Strategy Submission Document. This includes the reallocation of existing employment land and the allocation of new employment land based on the findings of the Employment Land Study.	None
Demand for housing in Hawkwell was questioned – it would be better in the centre of Hockley.	The issue of distribution of dwellings is not a consideration of the SA Addendum.	None
The SA does not compare general locations to all other general locations, only by grouped settlements.	The approach of distributing the District's housing allocation between various settlements was considered, appraised and found to be sustainable in earlier iterations of the Core Strategy process.	Role of previous SAs and iterations of the Core Strategy are explained in para 1.4 and 1.6 of Addendum.
The Council has not sought a legal opinion on the need for an SA review.	The Council was advised that it may wish to obtain a legal opinion on whether or not a review of the Core Strategy SA was required. The Council made the decision to undertake such a review in any case.	None
Community involvement does not support	Community involvement has been undertaken throughout the production of the Core Strategy.	None

the proposals in the Core Strategy.	Whilst it is an important component influencing the shape of the development plan, numerous key documents which form the evidence base for the LDF must also be taken into consideration, and together these must be balanced when making decisions.	
Brownfield / windfall sites should be used ahead of Green Belt land. Brownfield opportunities have not been properly considered.	The Core Strategy seeks to ensure that brownfield land is used ahead of Green Belt land, as far as practicable (Policy H1). Potential deliverable brownfield sites have been identified and assessed through the Strategic Housing Land Availability Assessment.	None
Impact on wildlife has not been properly considered.	The potential impact on biodiversity has been considered within the SA Addendum at a strategic level.	None
Locations identified would entail no social, environmental or economic benefits.	The SA identifies the social, environmental, economic benefits / negatives for potential locations.	None
Locations identified would cause harm to character.	Impact has been considered through the SA. Policies within the Core Strategy seek to mitigate any potential harm to character.	None.
The SA does not consider extending the plan period to 2031.	The SA Addendum is primarily concerned with the general locations and the reasonable alternatives, focussing on spatial aspects of the plan. Temporal aspects, including extension of Plan Period to 2031, were assessed through previous SA work. The option to extend the plan period was subject to a separate consultation in October/November 2010	Role of previous SAs and iterations of the Core Strategy are explained in para 1.4 and 1.6 of Addendum.

	and an SA.	
Landscape impact of development in South East Rayleigh has not been properly considered.	Landscape impact is considered against objective 8 in the SA.	None
Appraisal of flood risk issues is not current.	The appraisals are based on information contained within the SEA Baseline Information Profile, which is considered up-to-date and accurate, particularly for the purposes of addressing broad, general locations.	None
There is no clear assessment of the quantum of housing that can be delivered on various sites around Rayleigh.	The suitable brownfield sites and Green Belt sites have been identified and assessed through the Strategic Housing Land Availability Assessment in terms of their potential capacity and deliverability. Furthermore all of the sites put forward through the 'Call For Sites' exercise have been assessed within the emerging Allocations DPD.	None
There is no justification for ruling out directing the majority of housing to Rayleigh.	The strategy to direct the majority of development towards Rayleigh was considered at the initial Preferred Options stage in 2007. Following public consultation and appraisal, the Preferred Options was revised and the balanced strategy was taken forward to the submission stage.	None
It is not clear that the findings of the Strategic Housing Land Availability Assessment have been incorporated in the SA Addendum.	The Strategic Housing Land Availability Assessment assesses the potential capacity and deliverability of brownfield sites and Green Belt sites within the preferred general locations set out in the Core Strategy. The SA Addendum, however, assesses the sustainability of the general locations identified	None

	in the Core Strategy and the reasonable alternatives to these.	
Parts of South West Hullbridge are brownfield and white land, not Green Belt.	The Proposals Map which forms part of the Replacement Local Plan 2006 shows that the area to the south west of Hullbridge is Green Belt land. Brownfield land can be designated as Green Belt.	None
The dwellings provided will generally attract those currently living within London who rarely add anything to the local community and deny local people much needed affordable housing.	There is an identified local need. The Core Strategy seeks to ensure the provision of housing towards meeting this need.	None
The Core Strategy does not sufficiently address the accommodation needs of Gypsies and Travellers: it is not clear what the evidence is to justify the level of provision proposed; the deliverability of providing sites within existing residential areas is questionable; it is not clear how sites in the Green Belt, if they are to be considered, will be identified. These issues have not been addressed through the SA.	An assessment of Gypsy and Traveller accommodation needs was undertaken in 2009 (Essex Gypsy and Traveller Accommodation Assessment) and identified a need for 14 additional pitches in Rochford District by 2021. The Core Strategy does not rule out the use of land currently allocated as Green Belt. The Core Strategy sets an overarching policy to ensure delivery of Gypsy and Traveller accommodation needs, but it does not seek to identify specific sites – this will be done through the Allocations Development Plan Document. This Core Strategy policy has been appraised through previous iterations of SA.	Role of previous SAs and iterations of the Core Strategy are explained in para 1.4 and 1.6 of Addendum.
The assessment of Rawreth as a location has not properly considered the relationship of Battlesbridge train station to	Battlesbridge train station is located quite a distance away from Rawreth village and it is unlikely to be within walking distance from	SA addendum amended to note there is a train station at Battlesbridge (for completeness) and that this may be

<p>potential development.</p>	<p>development there (it is over 1 mile from the old centre of Rawreth as described in the Parish Plan) . The presence of a train station in Battlesbridge does not justify development in Rawreth village. It is unclear why a train station in one settlement justifies development in another. It is relevant to note that Rawreth has been assessed as a location in response to Core Strategy consultation had suggested this could be considered as an alternative to other Rayleigh locations – there is no suggestion that Battlesbridge could be considered such an alternative.</p>	<p>utilised by residents of a development, but that the station is in a different settlement and unlikely to be within walking distance of development in Rawreth.</p>
<p>The assessment considers West Great Wakering and Canewdon, but not Tithe Park.</p>	<p>The SA Addendum does not consider specific sites. However, this site to the south / south west of Great Wakering would constitute an urban extension to Southend, and other than promoting coalescence between settlements, development of this site is likely to contribute to Southend's housing need rather than Rochford District's need.</p>	<p>None</p>
<p>Sustainable extension to Southend has not been considered.</p>	<p>The Core Strategy relates to Rochford District. Housing allocations are based on meeting housing needs of settlements within Rochford District.</p>	<p>None</p>
<p>Consultation on the SA was difficult to access.</p>	<p>The consultation was advertised as a 'Hot Topic' on the front page of the Council's website providing a link to the SA Addendum consultation page. Paper copies were also available at local libraries and the Council's offices, and were available upon request.</p>	<p>None</p>

<p>The addendum fails to fully acknowledge all of the benefits of development in the general location of East Ashingdon (Location 6). It should be updated with a more balanced and fairer assessment of the location. Amendments to SA Objectives 1, 2, 4, 5, 8 and 12, and the summary were suggested. A comment was also made in relation to agricultural land.</p>	<p>The draft SA Addendum is considered to be a fair and objective assessment of the general locations preferred in the Core Strategy and the reasonable alternatives considered. It assesses the broad locations as opposed to more site-specific elements such as air quality assessments of specific sites. Such considerations are more appropriate within the Allocations DPD.</p>	<p>None</p>
<p>The addendum fails to fully acknowledge all of the benefits of development in the general location of South East Ashingdon (Location 5). It should be updated with a more balanced and fairer assessment of the location. Amendments to SA Objectives 1, 2, 4, 5 and 10 were suggested.</p>	<p>The draft SA Addendum is considered to be a fair and objective assessment of the general locations preferred in the Core Strategy and the reasonable alternatives considered. It assesses the broad locations as opposed to more site-specific elements, such as the presence of existing utilities. Such considerations are more appropriate within the Allocations DPD.</p>	<p>None</p>
<p>Natural England commented that they do not wish to comment on this occasion.</p>	<p>Comment noted.</p>	<p>None</p>
<p>'Peggle Meadow' is the only viable option for the Council to consider in the general location of South Rochford. Development at this site would not engender coalescence with Southend.</p>	<p>The draft SA Addendum is considered to be a fair and objective assessment of the general locations preferred in the Core Strategy and the reasonable alternatives considered. It assesses the broad locations rather than specific sites. Specific sites will be considered through the Allocations DPD.</p>	<p>None</p>
<p>With reference to Table 2.1 – Strategic Objective 1, a strategic gap was not identified at the Preferred Options stage</p>	<p>Although a strategic gap was not identified in this general location at the Preferred Options stage, the Revised Preferred Options and Submission</p>	<p>None</p>

<p>between Rochford and Southend – this should be highlighted.</p>	<p>documents seek to identify general locations which would not promote coalescence both between settlements within the District and those on the borders of neighbouring authorities.</p>	
<p>With reference to Table 2.1 – Strategic Objective 5, although the addendum suggests that Option E was taken forward, this is contradicted by the inclusion of Canewdon (a tier 3 settlement) which undermines the Core Strategy.</p>	<p>As per this objective, the majority of new dwellings are being directed towards the higher tier settlements. Paragraph 4.10 of the Core Strategy Submission Document states that:</p> <p>“The strategy for the distribution of housing development is a balance between focussing development on the higher tier settlements, whilst allocating a proportion of the housing development to the lower tier settlements (with the exception of the fourth tier, where additional development is considered unsustainable) to ensure these established communities can be sustained and that rural services continue to be supported.”</p> <p>Some dwellings have been allocated to lower tier settlements as part of the balanced strategy to support local services and facilities.</p>	<p>Role of previous SAs and iterations of the Core Strategy are explained in para 1.4 and 1.6 of Addendum.</p>
<p>The site situated within Location 2 (South Rochford) is more sustainable than Location 1 (West Rochford) as it performs equally good or better against many of the objectives</p>	<p>The SA Addendum does not consider specific sites – it is an assessment of the preferred general locations and the reasonable alternatives. Specific sites will be considered through the Allocations DPD.</p>	<p>None</p>
<p>The site situated within Location 2 (South</p>	<p>The general location of South Rochford is in close</p>	<p>Addendum (location 2) now</p>

<p>Rochford) would contribute better to the balanced strategy than Location 14 (South Hawkwell). It is also better related to Southend Airport, the strategic highway network and Southend.</p>	<p>proximity to London Southend Airport, and the SA Addendum acknowledges this. However, it is pertinent to note the issue of connectivity. Links to employment growth around London Southend Airport may be challenging for any development in South Rochford due to barriers such as the railway line.</p> <p>Development in South Rochford has the potential to relate to services and facilities in Southend and the impacts of this should be noted. It is relevant to note that in terms of accessibility, economy and employment, South Rochford is considered to be a positive location. Consideration of the potential to relate to Southend is unlikely to render the location a negative against these particular objectives.</p>	<p>acknowledges the potential for development in South Rochford to relate well to Southend.</p>
<p>Development at this site (Peggle Meadow, South Rochford) would not engender coalescence with Southend as it is an infill site.</p>	<p>The Core Strategy is concerned with general locations, not specific sites. The issues raised within the SA Addendum are relevant to the general location of South Rochford.</p>	<p>None</p>
<p>Hullbridge and Canewdon are not sustainable areas for housing growth e.g. a lack of rail and bus services.</p>	<p>The Core Strategy proposes a balanced strategy approach to the provision of housing in the future. The dwellings proposed for these locations would support local services and facilities.</p>	<p>None</p>
<p>Great Wakering does not relate well to the existing centre of Rochford, or the centre of Southend. Although the document states that there are no significant environmental constraints, this</p>	<p>Great Wakering relates well to Shoeburyness, within Southend-on-Sea Borough. There are no environmental constraints within West Great Wakering that would cause this location to be excluded as a general location.</p>	<p>None</p>

<p>acknowledges that there are environmental constraints in this general location.</p>		
<p>In relation to Location 2 (South Rochford) further information was suggested:</p> <ol style="list-style-type: none"> 1. 'Healthy and Safe Communities' - the development of a Greenway and access to Warner's Bridge public open space (in the Borough of Southend) should be highlighted 2. 'Economy and Employment' - proximity to, and accessibility of, Southend Airport, the presence of Warner's Bridge as a crossing point for the railway line and proximity to several employment sites should be highlighted. 3. 'Accessibility' - proximity to Rochford town centre is comparable to Location 1 (West Rochford), a bus route and Southend Airport railway station. Indirect benefits for the area from infrastructure improvements in Southend should be highlighted. 4. 'Landscape and Townscape' - no coalescence between Rochford and Southend with development of the site. No strategic gaps were identified in South Rochford. The landscape impact at Location 1 (West Rochford) would be greater than at Location 2 (South Rochford). The landscape impact is being ignored at Location 1. The site within Location 2 is more sustainable. 	<p>The SA Addendum does not consider specific sites – it is an assessment of the preferred general locations and the reasonable alternatives. Specific sites will be considered through the Allocations DPD.</p> <p>Strategic issues such as proximity of London Southend Airport and Green Grid Greenways have been accounted for in the SA Addendum.</p>	<p>None</p>

<p>Housing numbers could be reduced at Location 1 and accommodated at Peggle Meadow.</p> <p>5. 'Land and Soil' - Land at Peggle Meadow is not Grade 1 agricultural land and is not in agricultural production.</p> <p>6. 'Air Quality' - connectivity of Location 2 (South Rochford) to sustainable transport links, Southend and the A127. Impact on air quality negligible.</p> <p>7. Summary – inclusion of Warner's Bridge as a crossing point for the railway line. The site is close to the town centre and bus services.</p>		
<p>It is a subjective assessment of sites that weighs in favour of those selected by the Council, and unjustly discriminates against other sites.</p>	<p>The draft SA Addendum is considered to be a fair and objective assessment of the general locations preferred in the Core Strategy and the reasonable alternatives considered. It does not consider specific sites – it is an assessment of the preferred general locations and the reasonable alternatives. Specific sites will be considered through the Allocations DPD.</p>	<p>None</p>
<p>Proximity to other settlements, railway stations, employment etc. are all factors that are weighed more strongly in other locations, but these have not been weighted in the case of 'Peggle Meadow', or have been completely ignored.</p>	<p>The draft SA Addendum does not consider specific sites – it is an assessment of the preferred general locations and the reasonable alternatives. Specific sites will be considered through the Allocations DPD.</p>	<p>None</p>
<p>Under the SA objectives of 'Balanced Communities', housing development in Hullbridge should score 2 positives,</p>	<p>The draft SA Addendum is considered to be a fair and objective assessment of the general locations preferred in the Core Strategy. There is a</p>	<p>None</p>

<p>particularly given that Location 7 West Rayleigh, which has few or no existing facilities, scores 2 positives.</p>	<p>difference between the scale and range of service and facilities available in Rayleigh as opposed to Hullbridge, and this is acknowledged within the SA Addendum.</p>	
<p>Under the SA objectives of 'Healthy and safe communities', no mention is made of access to the River Crouch or riverside walks in Hullbridge. Should Location 7 appears to score 2 positives, Hullbridge should also obtain the same remarks.</p>	<p>The commentary section in the 'Healthy and safe communities' sets out the advantages of the two locations respectively. Score is given in accordance with the issues stated.</p>	None
<p>Under the SA objectives of 'Accessibility' in Hullbridge, it is a little difficult to understand the negative score received as Hullbridge is only marginally further from the centre of Rayleigh than Location 7, which scores a positive.</p>	<p>Hullbridge scored a negative and a positive score in the appraisal matrices. This has taken into account both constraints and benefits Hullbridge is experiencing and the rationale are noted in the commentary section.</p>	None
<p>Under the SA objectives of 'Biodiversity', Hullbridge should at least score the same as with Location 7.</p>	<p>The reason why Hullbridge scored a '?' has been clearly explained in the commentary section. This is due to the potential impacts on the Crouch and Roach Estuary SAC that may require further detailed assessment at a later stage.</p>	None
<p>There are no archaeological records or evidence from the Sites and Monuments Record of any archaeological interest in Hullbridge, and therefore in the interest of consistency, the score should be 0 and the text read 'no significant effects identified' as with</p>	<p>In the Rochford District Historic Characterisation Report (36. Area to the West of Hullbridge), it points out that "Archaeological deposits are rare, however a raised mound is recorded, probably a farmstead platform. Prehistoric sites are recorded in the inter-tidal area which, in common with the rest of the zone, has the potential for further</p>	None

<p>Location 7 in the SA objectives of 'Cultural Heritage' for Hullbridge.</p>	<p>archaeological deposits to survive." Hence, 'no significant effects identified' is not applicable for this area.</p>	
<p>Under the SA objectives of 'Landscape & townscape' in Hullbridge, it is difficult to understand the rationale for a zero score for Location 1 West Rochford which has no landscape containment, and a question mark against Hullbridge, particularly when the SW Hullbridge site identified is outside any landscape designation.</p>	<p>As stated in the SEA Baseline, Hullbridge falls within the Crouch and Roach Farmland landscape character area, while West Rochford is classified as South Essex Coastal Towns. In general, the landscape sensitivity level of Crouch and Roach Farmland is relatively higher to developments and changes in Rochford District than the South Essex Coastal Towns character area.</p>	<p>None</p>
<p>There is concern about the Council plays down the impact of Flood Zone 3 impacts on Location 7, and penalises Location 9 for its topography.</p>	<p>The draft SA Addendum is considered to be a fair and objective assessment of the general locations preferred in the Core Strategy and the reasonable alternatives considered. Presence of Flood Zone 3 and impact on landscape are considered against different objectives.</p>	<p>None</p>
<p>A feasibility sketch scheme concept has been undertaken to demonstrate a design solution can overcome any possible concerns over the sites topography.</p>	<p>Although the feasibility sketch scheme concept was not included within the response, the information submitted suggests that this is for a specific site within the general location of South West Rayleigh. The assessment considers the general location of South West Rayleigh in strategic terms, and notes concerns regarding topography(however we note that this is not seen as an absolute constraint and is not the reason given for the general location's rejection).</p>	<p>None</p>

<p>Disagree with the statement that Location 9 has no access to the A127 without traffic going through the Town Centre. An initial Transport Report is provided. Discussion has been had with the Highway Authority and they have confirmed that there are no highway objections to the delivery of housing South West of Rayleigh (Location 9).</p>	<p>The assessment considers the general location of South West Rayleigh in strategic terms, and notes concerns regarding traffic accessing the A127.</p>	<p>None</p>
<p>South West Rayleigh is a more sustainable location than North of London Road, Rayleigh.</p>	<p>The SA Addendum sets out why North of London Road, Rayleigh has been identified as a general location for housing development and South West Rayleigh has not.</p>	<p>None</p>
<p>The SA relies on opinions, rather than facts.</p>	<p>The SA is informed by the SEA Baseline Information Profile, which provides a wealth of accurate data in respect of the District.</p>	<p>None</p>
<p>The public consultation period of 4 weeks is inadequate.</p>	<p>The consultation period was considered adequate for obtaining views on an evidence base document.</p>	<p>None</p>
<p>No reference was made to the Core Strategy Revised Preferred Options 2008.</p>	<p>The Core Strategy is an iterative process. The SA Addendum should be read in conjunction with the previous SA.</p>	<p>Role of previous SAs and iterations of the Core Strategy are explained in para 1.4 and 1.6 of Addendum.</p>
<p>It is considered that Hockley is a more sustainable location than Hawkwell, and there is no evidence supporting this low number of 50 homes.</p>	<p>The approach of distributing the District's housing allocation between various settlements was considered, appraised and found to be sustainable in earlier iterations of the Core Strategy process. The general locations within the Hockley and Hawkwell areas have been appraised against</p>	<p>None</p>

	one another.	
The Core Strategy is too site specific and hence this SA Addendum is not a fair and true representation of the entire district; only focussing on specific locations.	The Core Strategy is a strategic document which identifies general locations, and is not site specific. The scope of the SA is therefore proportionate to the scope of the Core Strategy. Specific sites will be considered through the Allocations DPD.	None
Disagree with various issues mentioned in the SA, such as Hawkwell is well related to London Southend Airport, this general location is well related to recreational opportunities, areas of public open space and Sustrans route are in proximity to South Hawkwell, opportunities for sustainable transport links. Also, there is no mention about local services and facilities and infrastructure improvements.	The SA Addendum assesses the general locations from a strategic perspective which corresponds with the approach of the Core Strategy and the requirements of the SEA Directive. Opportunities to enhance existing services and sustainable transport links have been considered within the SA Addendum.	None
The key changes to policies relate only to 'temporal aspects' rather than 'spatial aspects'.	This is irrelevant to the consultation in question. The SA Addendum only considers the preferred general locations and the reasonable alternatives (the spatial aspects of the Core Strategy) rather than the time period (the temporal aspect).	None
The SAA does not respond adequately to issues raised in the key case Save Historic Newmarket v Forest Heath District Council.	The SA Addendum has been prepared by specialist sustainability consultants and sets out a comprehensive assessment of the preferred general locations and the reasonable alternatives following the Forest Heath Court Ruling.	None

<p>It has previously been pointed out that the LPA has not undertaken a realistic comparative assessment. The LPA had an opportunity in the Inspector's request for an audit trail to show where this had been done. The LPA failed to demonstrate this because the work had not been done. The SAA was the final opportunity following the Forest Heath Court Ruling to demonstrate this, but it only looks at 'temporal issues' and ignores 'spatial issues' altogether.</p>	<p>The audit trail was produced in June 2010 and comments on this were invited at the time. The SA Addendum does provide a comparative assessment of the broad locations (both the preferred and the reasonable alternatives), and should be read in conjunction with other Core Strategy SA.</p>	<p>None</p>
<p>As the spatial aspects of the Core Strategy have not been considered, the case for the proposed general locations for housing remains unproven.</p>	<p>The SA Addendum primary focus is the spatial aspects of the Core Strategy.</p>	<p>None</p>
<p>Comments raised in relation to the previous SA (the SA underpinning proposed temporal changes to the Core Strategy) in the context of West Rochford and South Hawkwell.</p>	<p>These comments do not relate to the SA Addendum.</p>	<p>None</p>
<p>The LPA's decision to defer the consideration of detailed information and studies at a specific site level invalidates the choice of broad locations.</p>	<p>The Core Strategy is a strategic document which identifies general locations, and does not consider site-specific issues. The scope of the SA is therefore proportionate to the scope of the Core Strategy. Specific sites will be considered through the Allocations DPD.</p>	<p>None</p>