

**Rochford District Council – Allocations Development Plan Document:
Discussion and Consultation Document Sustainability Appraisal Report**

Appendix 12 – Summary of Responses to SA Consultation

Issues raised	Responses
Infrastructure cannot cope with additional houses.	The infrastructure required to support the quantum of development identified for the general locations within the Rochford District Core Strategy are set out within Appendix H1 of the document.
Option SEA1 – South East Ashingdon – Balanced Communities; Housing; Economy and Employment; Accessibility; Air Quality Objectives: Reference to additional retail units along Ashingdon Road should also be included.	Comment noted. The assessment broadly identifies the nearest parade of shops, but does not seek to identify specific retail units by address.
Option SEA1 – South East Ashingdon – Economy & Employment; Accessibility Objectives: The text should be amended to state that the site is located to the north of Rochford (adjacent to Ashingdon).	Whilst it is acknowledged that Options SEA1 to SEA3 are located to the north of Rochford, they are considered to be situated within the general location of 'South East Ashingdon'.
Option SEA1 – Landscape and Townscape Objective – The text should be amended to state that the site is “enclosed on three sides (north, south and west) and would create a more defensible green belt boundary, as opposed to the other options for this general location.”	Comment noted. The text within the assessment will be amended in the interests of clarity.
The Environment Agency suggested that paragraph 4.4 of the document should also include reference to: Water Cycle Study; South Essex Surface Water Management Plan; Anglian River Basin Management Plan. The SA Framework should be viewed to ensure the findings of these reports are all considered.	Comment noted. The published reports will be referred to in the Environmental Report, where appropriate. The SA Framework is considered to be consistent with the findings of these reports, where appropriate.
The Environment Agency commented that they are pleased that previous comments regarding ecological enhancements in relation to the SA Framework have been included, and also that recommendation/key observations in Table 7 and appendices regarding flood zones, green buffers etc have also been included.	Noted.

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<p>Tithe Park (Options E23 and E24) – The site is currently in an agricultural use, but, in the past has been the subject of brickearth extraction, which has reduced its agricultural quality. An independent Agricultural Land Survey Plan shows the site is predominantly Grade 2. Therefore the SA is incorrect in our view in stating that Options E23 and E24 will result in loss of Grade 1 Agricultural Land.</p>	<p>The assessments have taken a consistent approach in determining the quality of agricultural land for the options set out in the Discussion and Consultation Document. The determination of agricultural land quality is based on the Strategic Environmental Assessment Baseline Information Profile for the District which broadly identifies the varying quality of agricultural land throughout the District. In general the area around Great Wakering is classified as grade 1 agricultural land. The assessment will be updated to reflect that the agricultural land classification at this site is disputed.</p>
<p>Tithe Park (Options E23 and E24) – Tithe Park is the most sustainable option when considered against the other alternatives in terms of agricultural land quality.</p>	<p>As set out above the options have been assessed consistently using the Strategic Environmental Assessment Baseline Information Profile for the District.</p>
<p>Tithe Park (Options E23 and E24) – Tithe Park for employment purposes will have a lesser impact on the landscape and openness of the Green Belt as it adjoins the built up area of Southend to the west, and Poynters Lane to the north. Defensible Green Belt boundaries can be provided, ensuring that coalescence does not occur.</p>	<p>The issues of landscape and openness impact have been considered in the assessment. The defensibility of the Green Belt boundary has also been assessed for Options E23 and E24, with Option E23 likely to promote a more defensible Green Belt boundary than Option E24. Whilst the site, as a whole, may enable the creation of a defensible Green Belt boundary, this is not an option within the Discussion and Consultation Document and consequently has not been assessed.</p> <p>However, the general sustainability principles of this alternative option (to allocate the entire site) are comparable to Options E23 and E24 which have already been assessed within this Environmental Report, for example access to services and facilities, potential ecological implications, economic impacts etc.</p> <p>The entire site of Tithe Park, whilst promoting a defensible Green Belt boundary similar to Option E23, would create a substantial employment site in this non-strategic location. As noted within the assessment, the “general location to the south of Great Wakering is not considered to be an appropriate location for a large employment site” (Recommendations/Key Observations point 2, page 74).</p>

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	<p>In terms of potential coalescence between Great Wakering and Shoebury, the options in the Discussion and Consultation Document have been assessed against each other. In reference to Option E23, the assessment states that: "...the development of the scale proposed in this option to the south of Poynters Lane, on the borders of Shoebury rather than on the fringe of the village of Great Wakering, is more likely to promote coalescence between the settlements of Great Wakering and Shoebury, in comparison with other options for Great Wakering (such as E19 and E22). It may be less likely to promote coalescence than E20 and E21 for example." (Appendix 7).</p>
<p>Tithe Park – The other potential sites are situated in close proximity to the Local Wildlife Site at Great Wakering, whereas Tithe Park is some distance from this. This should be given more weight in the Sustainability Appraisal and should be explored further.</p>	<p>The assessment acknowledges that Options E19 to E22 are in proximity to the Local Wildlife Site. The assessment, however, takes into account a wide range of factors other than proximity to nature conservation designations.</p>
<p>Tithe Park – The site is easily accessible on foot by Great Wakering residents, plus close to Shoeburyness rail.</p>	<p>The assessment notes that "As this option is situated to the south of Poynters Lane it is situated further away from Great Wakering village centre and thus would not have a good relationship with the settlement of Great Wakering in comparison to the options north of Poynters Lane. The site has the potential to link to Poynters Lane and possibly Star Lane; however, the centre of Great Wakering village is situated further to the north. The poor relationship with the existing residential area of Great Wakering may encourage use of the private car, but there is potential to improve public transport in this locality. Such a large employment site in this location would have a significant impact on the local highway network to the detriment of the local community and wider sustainability objectives." (Appendix 7).</p>

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<p>Tithe Park – It is noted that the sustainability appraisal states that Tithe Park is not an appropriate location for a large strategic employment site. This approach does not accord with the Core Strategy which required “a new strategically located employment park”. Notwithstanding this, the size of Tithe Park is beneficial as it allows for flexibility to provide employment development of an appropriate size on part of the site, whilst leaving a green buffer to landscape the development.</p>	<p>Whilst the Rochford District Core Strategy seeks to allocate a site for a new employment park in the general location to the ‘South of Great Wakering’, it notes that the “new facility will be capable of accommodating businesses displaced from Star Lane Industrial Estate” (Policy ED4). It does not suggest that a large employment site should be located in the vicinity of Great Wakering. As such, and as reiterated within the assessment, this general location “is not considered to be an appropriate location for a large employment site” (Recommendation/Key Observations 2; page 74). It also states in reference to Option E23 that “Whilst retaining local employment opportunities, this option would provide a surplus of employment land in the eastern area of the District, as opposed to the west of Rayleigh and north of London Southend Airport which are better related to the strategic road network as well as public transport routes.” (Appendix 7). The issue of accessibility has also been addressed within assessment.</p>
<p>Option WG3 – Land west of Alexandra Road is unsuitable for 56-85 dwellings due to the narrow access from Exhibition Lane. This is a wooded area, partly adjoining Star Lane Pits to the west, and it also accommodates protected species (bats, badgers, rare insects and invertebrates). Residents in Alexandra Road also have rare newts breeding in their ponds, who must use land behind Alexandra Road for migrating.</p>	<p>Comment noted. The assessment will be amended to reflect the potential for the site to the west of Alexandra Road to have ecological value. It should also highlight the potential for this area to be identified as an area of open space or a wildlife corridor. However, the fact that the site was not identified as part of the Local Wildlife Site review should also be mentioned.</p>
<p>Option E9 North – It was questioned how the relocation of Star Lane Industrial Estate would be funded and if businesses can afford rents, resulting in loss of jobs from the area.</p>	<p>Star Lane Industrial Estate is proposed to be relocated onto new employment land to the ‘South of Great Wakering’ as set out in the Rochford District Core Strategy.</p>
<p>Option E19-E24 – Great Wakering is on the edge of Essex and to greatly increase the size of the Industrial Estate would create pollution. There must be sites more strategically placed.</p>	<p>The Rochford District Core Strategy advocates the relocation of businesses displaced from Star Lane Industrial Estate onto new employment land to the ‘South of Great Wakering’. It does suggest that the area around Great Wakering is suitable for a large employment site.</p>
<p>Natural England commented that ideally, the report ought to provide a methodology section that explains how the appraisal took into account the requirements of Annex 2 of the Directive and the criteria used to determine the likely significance of the effects of the site options.</p>	<p>Noted. The detailed methodology and a review of compliance will be provided in the Environmental Report accompanying the draft DPD.</p>

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<p>Natural England noted that the appraisal often makes reference to potential cumulative effects however Natural England recommend that other aspects such as distinguishing between short and medium term impacts and their inter-relationships should be presented.</p>	<p>Noted. Where pertinent, the difference between short and medium term effects (e.g. construction vs. operational) is raised. Where relevant, this will be further detailed in the next Report.</p>
<p>Natural England commented that the appraisal would benefit from an overall view on such deficiencies and their implications on the robustness of the appraisal of individual options, in line with Annex 1 (h) of the Directive.</p>	<p>Any gaps or information deficiencies will be described in the next Report.</p>
<p>Natural England commented that it is not clear how data limitations have created a need to rely on assumptions when assessing significant effects. As such, it is not possible to be clear that the appraisal is linked to the evidence-base identified through scoping.</p>	<p>Any data limitations or assumptions will be described in the next Report.</p>
<p>Natural England commented that the appraisal appears to lack quantification such as site area or distance from designated sites. For example, paragraph 6.57 observes that “There is a Local Wildlife Site in close proximity to all of the options to varying degrees (with the exception of Option WGW5)”.</p>	<p>The site area of the options is set out within the Discussion and Consultation Document itself (Appendix 2). They are not repeated within the assessment.</p> <p>The majority of the options for Great Wakering (Options WGW1 to WGW5) are adjacent to the Local Wildlife Site which is identified in the assessment, where appropriate.</p>
<p>Natural England commented that they agree with the importance of proportionality (paragraph 2.2); however, there is a lack of supporting evidence or map based evidence given the extensive text. The appraisal would benefit from having a clearer and self-contained report with maps of the sites in relation to environmental resources, to aid the interpretation of the conclusions provided in the report and the appendices.</p>	<p>Detailed maps of the options are provided in the Discussion and Consultation Document itself, so are not repeated in the Report.</p> <p>The assessment has utilised environmental information about the District, including a wide range of maps, contained within the Strategic Environmental Assessment Baseline Information Profile, so are not repeated in the Report.</p>

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<p>Natural England commented that the statements of how an option performs against sustainability objectives require clarification and consistency in approach and these need to cross-reference with the appendices for individual options. Statements such as “Option E9 perform strongly against the sustainability objectives within the context of being reallocated from employment to residential use”, requires clarification and consideration of other factors affecting the sustainability of the site. It is not always clear that the preferred option will achieve a balance in terms of sustainability outcomes. Issues such as duration of effects, their reversibility and any uncertainties could be discussed in more detail.</p>	<p>Noted. The appraisal will be updated for the final SA report and a further consistency check/clarification undertaken.</p>
<p>Natural England commented that sustainable development requires economic, social and environmental objectives to be met, together and at the same time. Policy integration is essentially about achieving these win-win-win solutions and we believe solutions which meet all three objectives without significant harm to any of them, should always be the goal. Some situations will mean that aspects of the environment may be depleted. However, all development is capable of delivering benefits as well as fully mitigating and compensating for environmental harm and we believe that the best way of planning for these scenarios is to adopt the sequential approach.</p>	<p>Noted.</p>
<p>Given the SSSI status of the estuarine habitats, an approach is required that not only takes account of direct effects of encroachment, but also the indirect effects resulting from nutrient enrichment, changes to drainage and disturbance. Natural England advises that further information should be provided to support the contention that Option E1 performs well against the sustainability objectives in context of the river Crouch and that Option E4 performs strongly against the objectives and the river Roach.</p>	<p>Noted. The appraisal will be updated for the final SA report and a further consistency check/clarification undertaken.</p>
<p>Natural England recommends that a presentation of the relative performance of each option is provided to enable an appreciation of the merits of each site and the ability of subsequent design and mitigation to lessen potentially adverse effects.</p>	<p>The key merits and drawbacks of each of the options are summarised within the main report, and where appropriate the assessment indicates where design and mitigation measures would be beneficial to lessen potentially adverse effects.</p>

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<p>Natural England highlighted some potential contradictions: paragraph 6.180 “The Coastal Protection Belt is a landscape designation rather than an indication of ecological value”, whilst paragraph 6.152 states that the Coastal Protection Belt “encompasses numerous nature conservation designations”.</p>	<p>This means that within the area encompassed by the Coastal Protection Belt, there are also a wide range of nature conservation designations. This should be clarified within the text.</p>
<p>Natural England commented that it is not clear how “The inclusion of public open space would have a negative effect on community cohesion” as stated in paragraph 6.7.</p>	<p>As stated within the Report “The inclusion of public open space would have a negative impact on community cohesion if Option NLR2 was brought forward for development through severing the developable area of the site” (Paragraph 6.9).</p>
<p>Natural England request confirmation that the statements within the appendices that are employed to inform selection of the options will be translated into policy commitments or development brief requirements. To do otherwise raises questions on the robustness of the selection process. For example, in the case of WR1 it is stated that “<i>the infrastructure requirements include an area of green space within the development which could improve the biodiversity of the area and provide a community benefit.</i>” Essentially there is a need for clarity in the assumptions made to inform the view whether the most sustainable option is being selected.</p>	<p>Agree clarity is important, however it is felt the meaning of this statement is clear. Furthermore, the infrastructure requirements for each general location are set out within the Rochford District Core Strategy.</p> <p>The assessments, and the Recommendations/Key Observations, will be used to inform the development of the Allocations DPD.</p>
<p>Recreational Pressures on Ecological Sites – Natural England is pleased that the document recognises that not all Local Wildlife Sites are publicly accessible. We also wish to encourage consideration to be given not just to the effects from disturbance, but also to effects associated with drainage, pollution, lighting etc as appropriate.</p>	<p>Noted, although these matters are often difficult to address at this level of assessment and can be dealt with through the planning application process.</p>
<p>Local Wildlife Sites – The designation of 39 Local Wildlife Sites is welcomed by Natural England, however it should be recognised that designation does not secure their long term ecological value unless appropriate management regimes are put in place and that indirect effects from development do not undermine their viability (see DEFRA publication 1).</p>	<p>Comment noted.</p>

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<p>Boundary Treatments – In several places the Sustainability Appraisal recommends that a green buffer is retained or created (see para 6.20). Where ancient woodland is potentially affected then Natural England recommends that the appraisal recognises the desirability of providing undeveloped and landscaped areas, of sufficient width (at least 15m) and that appropriate management regimes are embedded into the site development briefs to ensure that they deliver the services intended over the medium and long term.</p>	<p>Comment noted. The assessment and Recommendations/Key Observations have been amended to clarify this, where appropriate.</p>
<p>Green Belt Land – In the process of appraising the effects of development options upon sites, Natural England recommends that a perspective based around the ecological services provided by Green Belt land is developed rather than a geographical perspective on whether a particular development extends into Green Belt. That said, we support the position, that the appraisal should recognise the extent to which new boundaries would be defensible in the medium to long term.</p>	<p>Noted. The appraisal considers the ecological effects and opportunities through the SA objective on biodiversity.</p>
<p>Pedestrian Routes – Natural England would recommend that as part of the selection of preferred options the following principles should be considered: Opportunities for walking, cycling and riding, integrating access to the countryside with public transport should be maximised; Informal countryside recreation should be facilitated, aimed at enhancement of the network and greenspace compatible with environmental protection.</p>	<p>Noted – these concerns are considered in the SA Framework, e.g. through SA Objective 5 on accessibility.</p>
<p>Impact on Landscape Character – Natural England would expect the following principles on Landscape Character to be taken into account: Protection of designated landscapes, including historic landscapes, to protect their natural beauty and amenity, wildlife and cultural heritage; Using a landscape character based approach to underpin and guide decisions on development and setting out criteria based on policies for landscape character areas; To ensure that new development builds in landscape enhancement and a good "fit" into its setting and the wider landscape based on landscape assessment.</p>	<p>This is a comment of more relevance to the plan-making process than the SA. Notwithstanding, the SA addresses landscape concerns through SA Objective 8.</p>

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<p>Green Infrastructure – Natural England promotes the concept of green infrastructure (GI) as underpinning the approach to open space in urban areas, particularly in growth areas, growth points and eco-towns. We believe it is essential to provide, protect and enhance GI including public open spaces, green wedges and links, wildlife corridors and stepping stones. It is important to emphasise the multifunctional benefits to biodiversity, amenity, recreation and health and well being. Given this position, Natural England support the designation of the Upper Roach Valley and reference to its connection to green infrastructure. Similarly, promotion of the Coastal Protection Belt is also supported. However, we would highlight that in addition to designation, management plans are essential to ensure that actions occur on the ground.</p>	<p>Comment noted.</p>
<p>Addressing Uncertainties – Natural England are aware that there are a number of uncertainties within the appraisal; where these have a bearing upon the ecological, landscape and accessibility of the countryside and feature in the selection of the preferred options, Natural England encourages efforts be taken to address such uncertainties. This may take the form of further evidence to support the appraisal, commitments to undertake further studies to inform the specification of development briefs or commitments to require developers to deliver the information in support of planning applications.</p>	<p>Noted, uncertainties are noted throughout the appraisal, where relevant, and will be discussed in the final SA report.</p>
<p>Option SC2 – We support paragraphs 6.34 and 6.35 and agree that allocating land for additional development in Canewdon would have a positive impact on the existing community. In relation to paragraph 6.36 it is considered that the site at SC2 would be large enough to provide an appropriate range of property sizes and tenures including provision for lifetime homes. It is noted in the Recommendations that site SC2 performs well against the sustainability objectives.</p>	<p>Comment noted.</p>

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<p>Option SC2 – Balanced Communities Objective – It is acknowledged that the site would promote the regeneration and enhancement of the existing rural community. The site would not promote openness to the west as there are already existing residential properties to the west of the site. The site would be bounded to the east by the access road to the church, a property to the west and a road to the south, all of which are defensible boundaries. The boundary to the agricultural fields (north) could be reinforced with appropriate planting to ensure that it would be defensible. Any pressure for further development in the area would be entirely within the control of the District Council.</p>	<p>The assessment acknowledges that the option is largely enclosed to the east, south and west, however, it suggests that “This option would be less able to ensure that a defensible Green Belt boundary can be maintained as opposed to SC1.” (Appendix 3).</p> <p>Furthermore the assessment states that: “Development in this location would, however, extend the existing residential development further to the west than at present. It would also create an isolated area of designated residential development which would be segregated from the existing residential area to the east.” (Appendix 3).</p>
<p>Option SC2 – Healthy & Safe Communities Objective – The site has good accessibility to existing leisure facilities and public open space.</p>	<p>This issue is addressed within the assessment.</p>
<p>Option SC2 – Housing Objective – There is sustainable access from the site to key facilities. The general location of the site is sustainable and is able to accommodate a range of tenures and dwelling sizes including provision for lifetime homes.</p>	<p>The general location of ‘South of Canewdon’ is identified within the Rochford District Core Strategy. The assessment notes that “There is good access to existing local services in the village including shops, pubs, a doctor’s surgery and a primary school, although these may be less accessible for some.” (Appendix 3). Other factors such as the potential isolation of the site, if allocated, and the extension of the village further to the west, also require consideration as set out in the assessment.</p>
<p>Option SC2 – Economy & Employment Objective – The allocation of this site would help to support existing business and services within the settlement.</p>	<p>This is applicable to all the options, regardless of the actual site identified. The assessment notes that “Residential development in this location has the potential to support local shops and services.” (Appendix 3).</p>
<p>Option SC2 – Accessibility Objective – Like all of the options for South Canewdon, the site does not have a good relationship with the Sustrans route or any proposed Greenway. However it does have good access to an existing bus service and the facilities within the settlement are within walking distance. The highway links to the site would direct traffic through the village and it is acknowledged that there may be opportunities for the existing public transport links to be enhanced.</p>	<p>Comments noted. All of the options would be accessible to the existing bus service as acknowledged within the assessment, and are generally in proximity to local services and facilities. As noted within the assessment, however, Option SC2 “would extend Canewdon further to the west” (paragraph 6.52).</p>

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<p>Option SC2 – Biodiversity Objective – As with much of the land within this area, the site does have a couple of local landscape designations, however they do not relate to the ecological value of the site. The land is grade 3 agricultural land and therefore is likely to be of little value. There is potential for habitat creation in this area.</p>	<p>Comment noted.</p>
<p>Option SC2 – Cultural Heritage Objective – There are no heritage assets that would be directly affected by the development of the site.</p>	<p>The assessment of heritage assets also includes those below ground. The Rochford District Historic Environment Characterisation Project (2006) has been used to identify the potential for historical, archaeological and cultural heritage assets within the Historic Environment Character Zone in which the options are located. This is a consistent approach within the assessment.</p>
<p>Option SC2 – Landscape & Townscape Objective – The Sustainability Appraisal acknowledges that the site is enclosed on three sides.</p>	<p>Noted.</p>
<p>Option SC2 – Climate Change & Energy Objective – The site is not within area at risk of flooding and there will be opportunities to incorporate sustainable technologies and Code for Sustainable Homes compliant properties as appropriate.</p>	<p>Noted – this is acknowledged within the assessment for all the options for ‘South Canewdon’.</p>
<p>Option SC2 – Water Objective – As with all of the other sites within South Canewdon infrastructure will be required in relation to the foul drainage network. Notwithstanding this, the site will have no impact on water quality, and opportunities will be available to incorporate SUDs.</p>	<p>Comment noted.</p>
<p>Option SC2 – Land & Soil Objective – The acknowledgment that the site is the smallest of the four options and therefore would ensure the most efficient use of the land is welcomed.</p>	<p>Comment noted. However, it is important to note that density, onsite constraints, and other factors will determine the appropriate size of the site to ensure the delivery of the requirements of the Rochford District Core Strategy.</p>
<p>Option SC2 – Air Quality Objective – Public transport is available, and there are also opportunities to encourage walking and cycling.</p>	<p>Comment noted.</p>
<p>Option SC2 – Sustainable Design & Construction Objective – The acknowledgment that there is a lack of constraints on the site is welcomed. The site is well placed to incorporate a range of sustainable measures as appropriate.</p>	<p>Comment noted.</p>

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Comments made in respect of Land South of Stambridge Road, Rochford and proformas 42 and 123.	These relate to Appendix 1 of the Discussion and Consultation Document which were consulted on in March/April 2010. These comments are not relevant to the assessment.
West Rochford – Paragraph 6.9 of the main Allocations SA Consultation document, states that whilst development in this general location of West Rochford ‘would be well related to the town centre in terms of access to services and facilities, the provision of a public transport link along Hall Road is constrained due to the configuration of the railway bridge by the West Street/Ashingdon Road/Hall Road roundabout’.	Comment noted, however, the railway bridge would not in any way restrict the potential for the provision of a bus service heading west from the site, towards the main routes into Southend and to proposed employment growth at Southend Airport. The assessment should be amended to reflect this.
West Rochford – In addition, Objective 5 of each of the SA tables which relate to potential Development Options WR1-WR5 (as contained within the separate SA document for West Rochford) states that the nearby railway bridge by the West Street/Ashingdon Road/Hall Road roundabout ‘may restrict the potential to provide a bus service to this location’.	<p>Comment noted, however, the railway bridge would not in any way restrict the potential for the provision of a bus service heading west from the site, towards the main routes into Southend and to proposed employment growth at Southend Airport. The assessment should be amended to reflect this. The assessment also acknowledges, with particular reference to Option WR1 which is considered to perform strongly against the sustainability objectives, that it is “in proximity to Rochford train station which is accessible via Hall Road and West Street, and the bus stops located in West Street and Ashingdon Road. There are also existing cycle lanes along Hall Road, and a proposed Sustrans route along Ironwell Lane bounding the northern border of the site.” (Appendix 3).</p> <p>The text should be amended to clarify that the presence of the railway bridge does not restrict the potential to provide a bus service from the west.</p>
West Rochford – Given that the railway bridge is a major constraint to accessibility in this location and, taking into account the overall scale of development proposed within West Rochford, it is highly questionable whether sustainable transport objectives could be realised. This issue is considered to be of fundamental concern as any development on the scale proposed within West Rochford should be expected to be suitably served by a range of public transport options.	The assessment does not identify the railway bridge as a ‘major constraint’ to accessibility. As noted above, the assessment acknowledges that there is a train station, existing bus routes and cycle routes and a proposed Sustrans route which are well related to Option WR1 in particular. There is also potential to provide a bus service to the site from the west. This should be further clarified within the document.

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<p>West Rochford – Paragraph 6.10 of the main Allocations SA consultation states that ‘Option WR1 would ensure the least projection to the west along Hall Road and would have less of an impact on landscape character. The other options for this general location would extend the developed area along Hall Road, with the potential to coalesce with ribbon development to the west, particularly Option WR4. Options WR1 and WR3 would have a greater positive impact on community cohesion as opposed to the other options’.</p>	<p>Comment noted.</p>
<p>West Rochford – Although it is the case that Option WR1 would ‘ensure the least projection to the West along Hall Road’ of each of the four options (WR1-WR4), it is not the case that development in this location can be considered acceptable in either Green Belt, landscape and historic townscape terms. Moreover, the individual options WR1-WR4 would appear to have been illogically drawn in that they do not correspond with defined features or reflect individual land ownerships. Give these circumstances we consider that the absence of a robust assessment of potential development options in this location has rendered the whole process irrelevant.</p>	<p>The general locations were assessed during the development of the Rochford District Core Strategy.</p> <p>Initial consultation on the Allocations DPD Discussion and Consultation Document afforded consultees the opportunity to comment on sites for consideration, and to suggest alternative sites to be considered as the plan-making process was moved forward. It should be noted that the Discussion and Consultation Document represents an early iteration of the Allocations DPD.</p>
<p>West Rochford – At paragraph 6.11, the main Allocations SA Consultation document confirms in respect of West Rochford, that ‘an important consideration in this general location is the historic environment. Paragraph 6.11 continues by stating; ‘development would not have a negative impact on the setting of the Rochford Conservation Area “per se”, as this would depend on the design of any development coming forward. Design will be managed through the development management process’.</p> <p>This view would appear to be contrary to that stated within the Council’s Conservation Area Appraisal, which recognises the historic importance of this location as an approach to Rochford and suggests that any future development in this location should avoid ‘the further suburbanisation of Hall Road’.</p>	<p>Comment noted.</p> <p>The issue of ‘further suburbanisation of Hall Road’ is one which may be addressed at the design stage of any development if a site abutting Hall Road were ultimately to be selected.</p>

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<p>West Rochford – Paragraph 6.11 is factually incorrect as, at best, two thirds of the southern boundary of Hall Road can be classed as developed. Furthermore, these large dwellings can be characterised as ribbon development which benefit from substantial set-backs from Hall Road and rear gardens which are exposed to the open setting of the Golf Course beyond. In this context, the dwellings which align the southern boundary can be classed as incidental development which does not in any way justify the ‘further suburbanisation’ of Hall Road.</p>	<p>It is a matter of fact that there is development to the south of Hall Road, opposite to Option WR1. The issue of ‘further suburbanisation of Hall Road’ is one which may be addressed at the design stage of any development if a site abutting Hall Road were ultimately to be selected, including the treatment of the frontage with Hall Road.</p>
<p>West Rochford – Despite these concerns, it is the case that an outline planning application (reference: 10/00234/OUT) for up to 600 dwellings was recently approved by Rochford District Council. The proposed developable area extends significantly beyond the parameters shown in Option WR1. As such, if the development were to be implemented, this would undoubtedly have a greater impact on Rochford than has been appraised.</p>	<p>The planning application in question includes a green buffer to the west of the area proposed to be developed. It should be noted that the Allocations Development Plan Document process is a separate process to the consideration of individual planning applications.</p>
<p>West Rochford – Paragraph 6.11 continues; ‘Option WR2 is situated the furthest from the Conservation Area and would subsequently have the least impact, this option is the one of the least sustainable options (in conjunction with Option WR4) as it would adjoin ribbon development to the west of Hall Road, provide poor access to services and facilities situated in Rochford town centre, and undermine the defensibility of the Green Belt boundary in this area’. This text would appear to accept that a single row of housing can be termed ‘ribbon development’. It also raises concerns regarding the defensibility of the Green Belt boundary in this location.</p>	<p>The ribbon development in question to the west of Hall Road refers to development separated from the existing settlement of Rochford, and further from existing services and facilities, hence the concern in respect of sustainability. The text in paragraph 6.11 and the assessment should be amended to provide clarification.</p>
<p>West Rochford – We refer to table 7 on page 27 of the main Allocations SA Document which provides a Sustainability Appraisal of Residential Options associated with West Rochford and note the Recommendations and Key Observations column states the following: (We provide a counter view beneath each of the Recommendations and Key Observations made)</p>	

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Issues raised	Responses
<p>1. Option WR1 performs strongly against the sustainability objectives</p> <p>There is no justification in planning terms as to why Rochford District Council considers that the site performs 'strongly'. Option WR1 protrudes significantly into the open countryside. The Allocations DPD Discussion and Consultation Document states, at page 15, that Option WR1 has the potential to incorporate local highway capacity and infrastructure improvements, a public transport service and infrastructure improvements, Sustainable Urban Drainage Systems and links and enhancements to local pedestrian, cycle and bridleway networks 'whilst also providing a defensible Green Belt Boundary'.</p> <p>We have already outlined concerns above regarding the feasibility of delivering a new public transport route along Hall Road connecting the proposed development with Rochford Town Centre.</p> <p>We also comment that Rochford District Council has identified that Option WR1 is capable of providing a defensible Green Belt boundary albeit the line of Green Belt extends significantly beyond the existing built up area and does not follow any existing landscape or other visible features.</p>	<p>The issue of the sites' impact on landscape, and projection into the countryside, is addressed in the assessments.</p> <p>As noted above, the railway bridge would not in any way restrict the potential for the provision of a bus service heading west from the site, towards the main routes into Southend and to proposed employment growth at Southend Airport.</p> <p>The assessment notes that the site is in proximity to Rochford town centre and is well related to the centre. It also acknowledges that the site is in proximity to Rochford train station, bus stops located in West Street and Ashingdon Road, existing cycle lanes along Hall Road, and a proposed Sustrans route along Ironwell Lane.</p> <p>As noted within the assessment, the arrangement of WR1 is such that it would ensure the least projection of development to the west as opposed to the other options for this general location (WR2, WR3 and WR4). The site is bounded by a road to the north and south and residential development to the east, and can ensure that a defensible Green Belt boundary can be maintained to prevent further encroachment into the Green Belt.</p>

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Issues raised	Responses
<p>3. The design of any development coming forward would need to be carefully considered within the context of the Conservation Area</p> <p>All Options in the general location of West Rochford are situated in close proximity to the Rochford Conservation Area. They are also influenced by a range of listed buildings and various archaeological constraints. Such assets are considered to be of historic importance, in accordance with PPS5. They also contribute greatly to the setting of this location. On this basis, we agree that any development coming forward in the general location of West Rochford will need to be 'carefully considered'. We refer again to comments which we make above regarding the potential impact of development at Hall Road in terms of the historic environment.</p> <p>Taking into account comments made above regarding the potential impact of development at Hall Road, we also consider it important that the proposal to allocate a significant proportion of the authority's strategic housing requirement to West Rochford should be assessed within the context of other proposed development sites, as are located broadly to the West and South of Rochford Town Centre.</p> <p>It is our view that such an assessment would likely have demonstrated the adverse impact which new development combined could have, for instance, in regard to air pollution associated with the congestion of the local highways network.</p>	<p>Comments noted</p> <p>The identification of general locations for residential and employment use, and the relationship between them, is a strategic issue which was considered during the development of the Rochford District Core Strategy. It is important to remember that the emerging Sustainability Appraisal for the Allocations DPD should be read in conjunction with the Sustainability Appraisal for the Rochford District Core Strategy.</p> <p>The identification of general locations for residential and employment use, and the relationship between them, is a strategic issue which was considered during the development of the Rochford District Core Strategy. It is important to remember that the emerging Sustainability Appraisal for the Allocations DPD should be read in conjunction with the Sustainability Appraisal for the Rochford District Core Strategy.</p>
<p>Comments made in respect of the proforma for 'call for sites' reference 42, 159 and 199 within the Addendum to Appendix 1.</p>	<p>These relate to Appendix 1 of the Discussion and Consultation Document which was published in 2010. These comments are not relevant to the assessment.</p>

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Issues raised	Responses
<p>In terms of the Sustainability Objectives, it is further noted that the SA does not consider that the development of land West of Rochford/North of Hall Road would contribute towards '<i>sustainable levels of prosperity and economic growth</i>', or '<i>promote more sustainable transport choices both for people and moving freight</i>'.</p>	<p>The general location of West Rochford was assessed at the Core Strategy stage against the SA Objectives. The assessment forming part of this report considers both these issues for the options in the Discussion and Consultation Document.</p> <p>The options for West Rochford contribute differently to the economic and accessibility objectives as set out in the Report, for example in terms of the relationship with the existing settlement, access to services and facilities, public transport accessibility, business development etc.</p> <p>In terms of accessibility in particular, as set out above, the assessment will be amended to reflect the potential for public transport provision despite the presence of the railway bridge.</p>
<p>Employment – North of Airport – The Discussion and Consultation Document acknowledges that the London Southend Airport and Environs Joint Area Action Plan will allocate land for employment 'North of London Southend Airport'.</p> <p>This appears to be a pre-determined growth strategy which does not have sufficient regard to the alternative employment sites available within Rochford District, for example to the east of the airport.</p>	<p>The Rochford District Core Strategy identifies that land to the 'North of London Southend Airport' will be allocated for employment uses. The area identified 'North of London Southend Airport' is within the Joint Area Action Plan Area as illustrated within Figure 3.1 of the Discussion and Consultation Document.</p> <p>An alternative option to the east of the airport – which was submitted during the public consultation on the Discussion and Consultation Document – has been appraised within the assessment (Appendix 11; Option ALT9).</p>
<p>Employment – North of Airport – The Council would not appear to have assessed, to a sufficient extent, the potential impact of locating employment uses to the north of London Southend Airport in association with the proposed residential development of land north of Hall Road.</p>	<p>The identification of general locations for residential and employment use, and the relationship between them, is a strategic issue which was considered during the development of the Rochford District Core Strategy. It is important to remember that the emerging Sustainability Appraisal for the Allocations DPD should be read in conjunction with the Sustainability Appraisal for the Rochford District Core Strategy.</p>
<p>Employment – North of Airport – It is considered that allocation of land north of London Southend Airport would have a significant adverse impact on the openness of the Green Belt in this location, whilst contributing towards the coalescence of Rochford and Southend-upon-Sea. It would also increase pressure on other land within the vicinity of West Rochford, thereby, challenging the defensibility of any proposed Green Belt boundary.</p>	<p>The identification of general locations for residential and employment use, and the relationship between them, is a strategic issue which was considered during the development of the Rochford District Core Strategy. It is important to remember that the emerging Sustainability Appraisal for the Allocations DPD should be read in conjunction with the Sustainability Appraisal for the Rochford District Core Strategy.</p> <p>The precise Green Belt boundary will be determined through the London Southend Airport and Environs Joint Area Action Plan.</p>

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Issues raised	Responses
<p>Employment – Rochford Business Park – The SA acknowledges that Rochford Business Park is a car-dependent employment development, which is not suitably or comparatively well-served by a range of public transport opportunities. The SA concedes at paragraph 6.85 that ‘the allocation of [Rochford Business Park] is unlikely to reduce the need to travel due to its isolation from existing urban centres’. Furthermore, it is the case that Rochford Business Park is located in close proximity to the proposed employment area North of London Southend Airport, which would be located to the west of Cherry Orchard Way. Therefore, it is not considered that either Rochford Business Park or Land North of London Southend Airport can be considered well-connected with the existing urban area, and the associated working population of Rochford.</p>	<p>Comment noted. The assessment should be amended to reflect the fact that Rochford Business Park is in proximity, and has the potential to relate well, to the proposed employment growth around London Southend Airport and, as such, has the potential to benefit from the infrastructure improvements proposed for this area to improve accessibility.</p> <p>Recommendations in the Environmental Report should include that policies accompany the allocation of Rochford Business Park which seek to improve links with new employment development in proximity to London Southend Airport, and to take advantage of transportation improvements to which this area will be subject.</p>
<p>Employment – Rochford Business Park – SA consultation goes on to state under the sub-header Recommendations/Key Observations that:</p> <p>(1) Option E5 is an existing employment site which performs strongly against the sustainability objectives.</p> <p>(2) There is potential to improve public transport links to this site.</p> <p>The first conclusion made that the existing employment site ‘performs strongly’ against sustainability objectives would appear to be inconsistent with the analysis provided on page 50. It is also understood that concerns have previously been expressed regarding whether a bus service could realistically be provided along Cherry Orchard Way and Hall Road connecting either Land North of London Southend Airport or Rochford Business Park with Rochford Town Centre. On these grounds, we dispute the recommendation and key observations made regarding the suitability and sustainability of this location.</p>	<p>The Core Strategy identifies surface access to London Southend Airport as one of the District’s key transportation priorities. Details and specifics will be addressed within the London Southend Airport and Environs Joint Area Action Plan.</p>

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Issues raised	Responses
<p>Employment – Aviation Way Industrial Estate – At paragraph 6.90, the SA Consultation states ‘that the potential of the airport and adjoining employment land at Aviation Way will be explored through the London Southend Airport and Environs Joint Area Action Plan’. It is further stated at paragraph 6.91 that there is ‘limited public transport’ in close proximity to this existing employment site. The lack of public transport, and the site’s relative detachment from the wider working population of Rochford, clearly undermines the sustainability of this location.</p>	<p>Comments noted. The assessment should be amended to reflect the fact that Aviation Way Industrial Estate is in proximity, and has the potential to relate well, to the proposed employment growth around London Southend Airport and, as such, has the potential to benefit from the infrastructure improvements proposed for this area to improve accessibility.</p>
<p>Employment – Stambridge Mills – At paragraph 6.90, the SA Consultation states; ‘the site is detached from the existing settlement, which may impact on accessibility, particularly for those without access to a private car’. Stambridge Mills is an established Employment Site which is located on the fringe of the existing urban area of Rochford. Although the site can currently be described as physically-detached from the wider urban area of Rochford, due to the presence of an agricultural field comprising land south of Stambridge Road, this does not itself prevent opportunities for improved access and connectivity between Stambridge Mills and the wider urban area of Rochford. We note that a Planning Application was submitted in 2011 (Reference: 11/00494/FUL) which proposes the residential development of land at Stambridge Mills.</p>	<p>Comment noted.</p>
<p>Employment – Stambridge Mills – We note that Land south of Stambridge Road is currently subject to a planning application (Reference:11/00781/OUT) which proposes up to 251 dwellings in addition to public open space and new sustainable transport infrastructure. Specifically, we comment that the scheme proposes a new highway running east-west across Land South of Stambridge Road which would enable a safe and direct route to be provided between Stambridge Mills and Rocheway. The proposed highway makes provision for pedestrians and cyclists, whilst also having the potential to accommodate a Bus Route, thereby, substantially increasing the sustainability performance of Stambridge Mills.</p>	<p>The planning application 11/00781/OUT was refused. There is no indication that development of the site is likely to be delivered within the foreseeable future, as the site is on Green Belt land and not within a general location identified in the Core Strategy where Green Belt land will be allocated for residential development. As such, it would not be appropriate at this juncture, to assume for the purposes of the SEA that development was to likely to be delivered there.</p>

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Issues raised	Responses
<p>Employment – Stambridge Mills – Paragraph 6.114 states; ‘given the existing bulk and mass of the current development’, the proposed redevelopment of the site ‘represents an opportunity to improve the impact on the landscape’. This point clearly demonstrates that the local authority considers Stambridge Mills, in its current form, has an impact on the surrounding area which detracts from the setting of its general location.</p>	<p>The comment simply notes that bulk and mass of the existing structure, and that redevelopment provides an opportunity to enhance the visual amenity of the locality.</p>
<p>Employment – Stambridge Mills – We consider that Stambridge Mills has an urbanising effect which defines the eastern most extent of the existing settlement of Rochford. Stambridge Mills (and other urbanising features) are clearly visible from Land South of Stambridge Road. These features detract from the wider rural character of East Rochford, which only becomes pronounced beyond to the east of Mill Lane.</p>	<p>Comments noted. Stambridge Mills is an existing development, outside of the Green Belt.</p>
<p>Education – Site West of Rochford – The SA consultation states, at paragraph 6.156, that ‘the sustainability of allocating a new primary school to the west of Rochford depends on the specific site allocated for residential development. Please refer to the Sustainability Appraisals for residential development in this general location (Options WR1 to WR4)’. In this regard, we refer again to comments which we have made in respect of the proposed allocation of land for residential purposes upon land categorised as West Rochford (Options WR1-WR4). In summary, we do not concur that land to the West of Rochford can be considered a suitable or sustainable location for development.</p>	<p>The identification of general locations for residential and employment use is a strategic issue which was considered during the development of the Rochford District Core Strategy. It is important to remember that the emerging Sustainability Appraisal for the Allocations DPD should be read in conjunction with the Sustainability Appraisal for the Rochford District Core Strategy.</p>
<p>Education – Site West of Rochford – We also comment specifically in relation to matters regarding the proposed siting of a new Primary School within West Rochford, associated with a planning application which proposes up to 600 dwellings (Planning Application Reference: 10/00234/OUT). Rochford District Council resolved to grant planning permission, subject to referral to the Secretary of State and completion of a Section 106 Agreement, at the Council’s Planning Committee on the 18th January 2011.</p>	<p>It should be noted that the Allocations Development Plan Document process is a separate process to the consideration of individual planning applications.</p>

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Issues raised	Responses
<p>Education – Site West of Rochford – A parameters plan was submitted by the applicants as part of the planning application, which shows the preferred location of a new primary school as being contained within a 1.1 hectare parcel of land to the north west of the site. The school land shown is located the furthest possible distance away from the existing urban area of Rochford, which itself is located predominantly beyond the mainline railway to the east.</p>	<p>It should be noted that the Allocations Development Plan Document process is a separate process to the consideration of individual planning applications.</p>
<p>Education – Site West of Rochford – As such, if a primary school were to be permitted in West Rochford (especially in the location currently shown) it would neither serve to provide a focal point for the new development, or be considered accessible to school children from across the wider Rochford and Ashingdon urban area. Given these circumstances, we conclude that the proposal to provide a Primary School in West Rochford is unjustified and would, if implemented, cause a substantial increase in commuting within West Rochford (for instance, associated with the “school run”). The development as a whole would be unsustainable.</p>	<p>The identification of general locations for residential development – including West Rochford along with a new primary school – is a strategic issue which was considered during the development of the Rochford District Core Strategy. It is important to remember that the emerging Sustainability Appraisal for the Allocations DPD should be read in conjunction with the Sustainability Appraisal for the Rochford District Core Strategy.</p>
<p>Education – Site EDU4 – From the extract of the Local Plan Proposals Map and the aerial view of the site above, it is clear that Waterman Primary School has substantial potential to expand in order to accommodate additional primary school places if required. As a starting point, there exists an opportunity to “square off” the existing settlement boundary, by incorporating an additional area of land within the school’s curtilage. It is also the case that Planning Policy Guidance Note 2: Green Belts and Planning Policy Guidance Note 17: Planning for Open Space, Sport and Recreation confirm that Outdoor Sport Facilities including Playing Fields can be considered an appropriate use within the Green Belt, for which, special circumstances need not be demonstrated. As such, there also exists an opportunity to utilise land to the north of the existing settlement boundary as Playing Field Land associated with any proposal to redevelop existing land within the school’s curtilage.</p>	<p>Comment noted.</p>

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Issues raised	Responses
<p>Education – Site EDU4 – The SA Consultation confirms, at paragraph 6.191, that ‘the facilities identified in this option are an appropriate use on the fringe of the residential envelope...thus an education designation would ensure that the schools can meet the future needs of the community, as appropriate’. The allocation of land associated with established school uses, such as Waterman Primary School, has the potential to support new investment which could in turn deliver substantial cost benefits in terms of education provision. For instance, any future proposed extension(s) to existing school facilities, such as Waterman Primary School, would benefit from existing social, physical and environmental infrastructure, whilst also, being located close to the communities which they serve. The same cannot be said for West Rochford.</p>	<p>The identification of general locations for residential development – including West Rochford along with a new primary school – is a strategic issue which was considered during the development of the Rochford District Core Strategy. It is important to remember that the emerging Sustainability Appraisal for the Allocations DPD should be read in conjunction with the Sustainability Appraisal for the Rochford District Core Strategy.</p>
<p>Education – Site EDU4 – Paragraph 6.191 states; ‘although the allocation of these schools may ultimately result in a small loss of Green Belt land, the existing Waterman Primary already has an impact on the openness of the Green Belt’. The SA would appear to confirm that the development of land associated with Waterman Primary School could be considered acceptable, notably in Green Belt terms.</p>	<p>Comment noted.</p>
<p>Education – Site EDU4 – We consider it to be the case that any proposal to develop Green Belt land associated with Waterman Primary School would have a far lesser impact than would be the case with West Rochford, whereby, a development of up to 600 dwellings is proposed to project outwards significantly from the existing settlement in a westbound direction.</p>	<p>The identification of general locations for residential development – including West Rochford along with a new primary school – is a strategic issue which was considered during the development of the Rochford District Core Strategy. It is important to remember that the emerging Sustainability Appraisal for the Allocations DPD should be read in conjunction with the Sustainability Appraisal for the Rochford District Core Strategy.</p>
<p>Education – Site EDU4 – The SA Consultation confirms that ‘the existing playing field would retain its Green Belt designation to prevent unnecessary encroachment into the Green Belt. In effect, the existing playing field for Waterman Primary would have a dual designation of educational use and Green Belt’. We consider that the potential for expansion of Waterman Primary School should be given far greater consideration within the replacement Development Plan process.</p>	<p>The assessment acknowledges that the allocation of land for educational use will help ensure land is available for expansion of educational facilities if required.</p>

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Issues raised	Responses
<p>Option ALT2 – The SA specifically refers to the Rochford Conservation Area Appraisal (CAA) and Management Plan. The Rochford CAA states that Hall Road ‘still has a rural feel to it’ and ‘forms an attractive approach to the town and Conservation Area’. The CAA also recommends ‘that further suburbanisation of the road should be avoided in order to preserve the existing approach to the town and the setting of Rochford Hall’. These are issues which should also be applied within the context of the proposed development of up to 600 dwellings on land to the north of Hall Road.</p>	<p>Comment noted.</p>
<p>Option ALT3 – There would appear to be some discrepancies in the analysis for ALT3, particularly when compared against other potential allocations in West Rochford. For example, we note that the analysis provided under SA Objective 1 for ALT3 states; ‘a range of housing types can be provided’. Despite this, we note that paragraph 6.8 of the main Allocations SA consultation document states ‘all of the options in the general location of West Rochford would have a positive impact on ensuring that everybody has the opportunity to live in a decent home through providing a range of housing types, tenure and affordability to meet local needs. Dwellings built to the lifetime homes standard can also be provided’. In summary, it would appear to be the case that ALT2 and ALT3 are affected by similar issues to those which should affect the deliverability of identified Option sites within the general location of West Rochford (notably Options WR1-WR4).</p>	<p>Comment noted. However, this is not a discrepancy. There are issues which affect the appropriateness of all potential sites within the West Rochford general location, including ALT3, and these are reflected in the assessments.</p>
<p>Option WGW2 – We note that Option WGW2 comprises land to the West of Little Wakering Road, in addition to a narrow linear swathe of land which forms part of Option WGW1. We comment that it is unclear why these two land parcels have been grouped together as they would not appear to be a logical fit from a land use planning perspective.</p>	<p>Initial consultation on the Allocations DPD: Discussion and Consultation Document afforded consultees the opportunity to comment on sites for consideration, and to suggest alternative sites to be considered as the plan-making process was moved forward. It should be noted that Discussion and Consultation Document represents an early iteration of the Allocations DPD.</p> <p>The Environmental Report should be amended to explain the logic of this grouping.</p>

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Issues raised	Responses
<p>Option WGW2 – Land to the West of Little Wakering Road could be considered an appropriate location for development. Land to the west of Little Wakering Road would be fully contained on 3 sides (North, South and East) by existing residential development. In this regard, we consider that land to the West of Little Wakering Road would not impact upon the openness of the Green Belt, as any new development would only be visible from selective viewpoints in close range to the site.</p>	<p>Disagree. Barrow Hall Road borders the north of the site, with Little Wakering Road to the west and Southend Road to the south of the site. Although there is residential development to the east and south along Little Wakering Road and Southend Road, respectively, this site would still be highly visible from Barrow Hall Road and Southend Road, and more visible from the public highway than Option WGW 1. The assessment should be amended to reflect this.</p>
<p>Option WGW5 – Land to which Option WGW5 relates has previously been put forward to the Council by means of a site promotional document which confirmed that the site can be developed comprehensively, whilst ensuring the provision of appropriate physical and social infrastructure, in addition to affordable housing.</p>	<p>Comment noted.</p>
<p>West Great Wakering – We refer to page 32 of the SA consultation which states, at bullet points 3 and 5, as part of the recommendations/key observations, that <i>‘all of the options would have a greater impact on the openness of the Green Belt in the area than Option WGW1’</i> and that <i>‘Option WGW1 would likely create a more defensible Green Belt Boundary than Option WGW5’</i>. We dispute this analysis on the grounds that the criteria applied when assessing the suitability of Options within Great Wakering, demonstrates a misunderstanding of the local context, whilst also providing a narrow interpretation of Planning Policy Guidance Note 2 (PPG2) and other relevant national planning policy guidance. In response, we make the following key observations and recommendations:</p>	
<p>The analysis presented in bullet points 3 and 5 is undermined in that it groups each of Options WGW2, WGW3, WGW4 and WGW5 together, without recognising that each of the four Options presented would have a varying degree of impact on the openness of the Green Belt. For instance, Option WGW2 includes a parcel of land which relates to approximately half of the landholding presented at Option WGW5 (in addition to a linear swathe of land which forms part of Option WGW1). Within Option WGW2, we comment that the land parcel which relates to Option WGW5 would be fully contained on 3 sides (North, South and East) by existing residential development. In this regard, the site would not impact upon the openness of the Green Belt, as development would only be visible from selective viewpoints in close range to the site.</p>	<p>The impact on openness has been considered within the assessment for each of the options. The Report summaries that each of these options would have a greater impact on openness than Option WGW1.</p> <p>Option WGW2 is a different option to WGW5. WGW5 projects further westwards into the open countryside. The assessment should be amended to make this clearer.</p> <p>As set out above, although Option WGW2 is enclosed on three sides it would still be highly visible from Barrow Hall Road and Southend Road, and more visible from the public highway than Option WGW 1. The assessment should be amended to reflect this.</p>

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Issues raised	Responses
<p>West Great Wakering – It is noted that PPG2 applies great weight to the need to prevent the coalescence and/or merger of settlements, by ensuring a managed approach to the release of Green Belt land. In this regard, it is noted that Options WGW3 and WGW4 would require the use of land to the south of Great Wakering. The land concerned would not only be exposed on 3 sides to the open countryside (thereby impacting upon the openness of the Green Belt) but would, if allocated, contribute towards the coalescence of settlements through the merging of Great Wakering and Shoeburyness.</p>	<p>The assessment notes that Option WGW4 “has the potential to engender coalescence between Shoebury and Great Wakering, and would have a greater impact on the character of the landscape on a wider scale as opposed to other options. This option would also have a significant impact on the openness of the Green Belt in this area, particularly compared to WGW1.” (Appendix 3).</p>
<p>Option WGW5 – Option WGW5 would extend beyond the existing western boundary of Great Wakering, as currently formed by those residential properties which are served off Southend Road, Barrow Hall Road and Little Wakering Road. However, Great Wakering is situated to the North West of Option WGW5 and, therefore, has the potential to obscure views of WGW5 when viewed from a distance.</p>	<p>Great Wakering is not situated to the north west of Option WGW5.</p> <p>This option would still be highly visible from Barrow Hall Road and Southend Road, and more visible from the public highway than Option WGW 1. The assessment should be amended to reflect this.</p>
<p>Option WGW5 – Great Wakering itself comprises a linear urban form which is served primarily by Little Wakering Road. Little Wakering Road continues through the settlement, following a north-south alignment. This arrangement ensures that a large proportion of the dwellings within Little Wakering are orientated east-west, a factor which reduces the potential for views to be observed from the north of any future development at Option WGW5. Given these circumstances, it is considered that views of any future residential development at Option WGW5 would be no more pronounced than the existing settlement of Little Wakering when observed from either mid-range or long distance locations to the north and west. Furthermore, it is noted that views of Option WGW5 would be screened from the east due to the presence of existing development along Little Wakering Road.</p>	<p>Disagree. From the west, Great Wakering is served by Southend Road and Star Lane, as well as Little Wakering Road.</p> <p>In terms of Option WGW5, Barrow Hall Road borders the north of the site and Southend Road partly bounds the site to the south. Although there is residential development to the east along Little Wakering Road, this option would still be highly visible from Barrow Hall Road, Southend Road and Star Lane, and more visible from the public highway than Option WGW 1. The assessment should be amended to reflect this.</p>

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Issues raised	Responses
<p>Option WGW5 – Although some views of Option WGW5 may be partially visible from the south, these would again be distorted due to the presence of Star Lane Industrial Estate to the south. It is also the case that any future views from the south, associated with the proposed residential development of land at Option WGW5, could be considered less pronounced than would be the case for either WGW3 or WGW4. In this regard, it is concluded that the development of land which comprises Option WGW5 (beyond that identified in Option WGW2) only has the potential to impact upon the openness of the Green Belt to a limited extent when viewed from select locations in close range of the site to the west. This position would appear to be confirmed by analysis provided at paragraph 6.57 of the SA Consultation regarding Option WGW5.</p>	<p>Disagree. Given the extension of Option WGW5 to the west towards Haul Road (the western boundary of the site), this option would still be highly visible from Barrow Hall Road, Southend Road and Star Lane, and more visible from the public highway than Option WGW 1. The assessment should be amended to reflect this.</p> <p>Paragraph 6.57 considers the defensibility of the Green Belt boundary and impact on the openness of the Green Belt. It does, however, consider views from different locations around the options. However, the summary will be amended to reflect the assessment as set out above.</p>
<p>Option WGW5 – The analysis produced by the Council at paragraph 6.57 does not take into account either the presence of the existing highway to the west of the site, or the opportunity which exists to incorporate appropriate mitigation measures as part of any future scheme, for example, a mature landscape boundary. We would be pleased to provide additional information in support of the proposed allocation with this regard.</p>	<p>The 'existing highway to the west' is the Haul Road which leads north to Barling landfill site. This road/track, in accordance with planning permission for the land fill site must be removed and the land restored to its former condition. The assessment acknowledges the presence of this road/track – paragraph 6.57 should be updated to reflect this.</p>
<p>Option WGW5 – We conclude therefore that Option WGW5 has the potential to be fully enclosed by defensible boundaries and features on all sides, including the rear curtilage of residential properties and existing highways. Therefore, it is the case that the proposed allocation would provide a long-term defensible Green Belt boundary, which would prevent future urban sprawl.</p>	<p>The assessment acknowledges that a defensible Green Belt boundary is possible for Option WGW5. However, as above, it is still pertinent to emphasise that this option projects further into open countryside than other options. Also as acknowledged above, the track to the west of the site is not a permanent feature. The assessment will be updated to reflect this.</p>

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Issues raised	Responses
<p>West Great Wakering – Analysis regarding the perceived importance of Local Wildlife Sites is provided within pages 66-67 of the SA Consultation Document. Specifically, we note that the SA consultation states, at paragraph 6.143, that <i>‘there is likely to be significant long-term positive effects for biodiversity through seeking to maintain, restore and enhance sites of nature conservation importance through the designation of such locally important sites’</i> and, at paragraph 6.144, that <i>‘the continued protection of these local wildlife sites may have positive long-term effects through enhancing the quality of landscape areas, particularly to the east of the District’</i>, within which, Great Wakering is located. In this context, we consider it essential that a detailed assessment of the Local Wildlife Site at West Great Wakering is undertaken to assess whether Option WR1 and other proposed allocations within the vicinity of West Great Wakering can be considered appropriate locations for development.</p>	<p>A more detailed assessment of the potential impact of the options within the Discussion and Consultation Document will be undertaken in the development of the document.</p>
<p>West Great Wakering – It is further noted that the Recommendations and Key Observations section of the SA Consultation states at page 32, bullet points 6 and 7, with regard to the potential development of Options WGW1-WGW5, that <i>‘the impact of any development on the Local Wildlife Site (with the exception of WGW5) would need to be carefully managed to avoid harm to this site’</i>, and that <i>‘a green buffer between the local wildlife site and the options (with the exception of Option WGW5) should be provided to help mitigate the impact of development on the site’</i>. This confirms the analysis we provide above regarding the limitations of land formed by Option WGW1 in terms of its capacity and potential to deliver any new residential development in accordance with the Council’s own strategic housing requirement of 250 dwellings within Great Wakering. A more detailed assessment of the potential impact which development in this location would have in terms of the local wildlife would need to be undertaken prior to any allocation of land formed by Option WGW1.</p>	<p>Comment noted.</p>
<p>Option WGW5 – It is emphasised that Option WGW5 would have the least environmental impact of all potential Options from the perspective of Biodiversity.</p>	<p>It is noted that Option WGW5 is not adjacent to the Local Wildlife Site. This is reflected in the assessment.</p>

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Issues raised	Responses
<p>Option E9 – We are of the understanding that Star Lane Industrial Estate, in association with Star Lane Brickworks, is being considered as a potentially suitable location for residential development. First and foremost, we note that any such proposal would result in the loss of existing employment land, thereby, reducing the opportunities which exist to provide employment opportunities to sustain the working population of Great Wakering and elsewhere across the Rochford District.</p>	<p>The reallocation of Star Lane Industrial Estate and Star Lane Brickworks is identified within the Rochford District Core Strategy. However, the Core Strategy also identifies that land in the general location of ‘South of Great Wakering’ is allocated for a new employment site to compensate.</p>
<p>Option E9 – Many of the SME businesses historically associated with Star Lane Industrial Estate have an established market within Rochford District. The Council has noted at bullet point 2, page 54, of its Recommendations/Key Observations, that the loss of existing businesses from Star Lane Industrial Estate is a concern. The SA Consultation states that the ‘failure to provide alternative accommodation for existing employment uses will have a negative impact on sustainability objectives’. In this context, it is essential that alternative premises are made available within Rochford District, within which, SME businesses can prosper.</p>	<p>As above, the Rochford District Core Strategy also identifies that land in the general location of ‘South of Great Wakering’ is allocated for a new employment site to compensate.</p>
<p>Option E9 – We note that the SA Consultation states, at paragraph 6.97, page 55, in regard to the Star Lane Brickworks sites that this is considered to comprise poor quality building stock and, therefore, that the Councils Employment Land Study (2008) recommends the reallocation of the site for alternative planning uses.</p>	<p>Comment noted. The buildings which were previously on site have been removed. The text should be amended to reflect this.</p>
<p>Option E9 – It is further noted that the SA Consultation states, at paragraph 6.97, in regard to alternative residential uses, that ‘if the northern section [Star Lane Industrial Estate] does not come forward for development, then this would lead to piecemeal development which would impact on community cohesion’. The SA Consultation continues at paragraph 6.99 by stating ‘this site, as opposed to [Star Lane Industrial Estate] does not have good links to the existing settlement and local services and facilities within the village centre in terms of providing pedestrian access’. It would appear to be the case, therefore, that the Council has conceded the brickworks site is relatively inaccessible and would not, therefore, contribute towards sustainable development.</p>	<p>The assessment acknowledges that the brickworks site’s accessibility to the settlement has the potential to be enhanced if its development takes the form of a comprehensive development incorporating the northern section of the industrial estate.</p> <p>However, whilst links to the settlement would be less favourable without the development of the northern section of the industrial estate, they would still be possible (existing footpaths, but less direct). This assessment should be amended to reflect this.</p> <p>It is not the case that the Star Lane brickworks site is inaccessible. In any case, whilst accessibility is an important component of sustainable development, it is not the only consideration.</p>

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Issues raised	Responses
<p>Option E9 – In making its Key Observations and Recommendations, at bullet point 1, page 56, the Council states that the Star Lane Brickworks site ‘performs strongly against the sustainability objectives within the context of being reallocated from employment to residential use’. This assertion is considered to relate solely to the re-use of brownfield land and does not, therefore, have due regard to the either the relative inaccessibility of this location or its existing potential to provide alternative employment uses to sustain the local working population. This assertion also does not take into account the fact that new green field land will be required in any case in order to accommodate the District’s existing and future employment needs.</p>	<p>The site is not considered “inaccessible”. Although this should be made clearer within the assessment.</p> <p>The assessment should note the potential for the site to provide local employment.</p> <p>The assessment notes the potential for the option to provide local employment from the design to the construction stage. It also notes that additional employment land will need to be reallocated to the south of Great Wakering to compensate.</p>
<p>West Great Wakering – We identify that there exists a potential alternative allocation which could be advanced on the basis that this effectively balances each of the issues we identify above.</p>	<p>Noted – the potential alternative allocation suggested is assessed below.</p>
<p>West Great Wakering – Land Parcel 1 relates to an area which is approximately 75% of that currently shown to the West of Little Wakering Road, within Option WGW5. It is considered that the remaining 25% could incorporate a range of Open Space uses; including a landscape buffer (land parcel 6). Land parcel 2 relates to part of the additional linear swathe of land which is shown in Option WGW2. (This land is also included as part of Options WGW1 and WGW3, which are options we consider should be discounted as part of this Allocations DPD SA process). Land parcels 3 and 4 could be developed for residential purposes, assuming that appropriate alternative employment space can be provided elsewhere in the District.</p>	<p>The potential alternative option highlighted forms a slightly alternative configuration to Option WGW2 combined with Option E9 of the Discussion and Consultation Document. These Options have been thoroughly assessed within the Environmental Report.</p> <p>In terms of the southern site of Option WGW2 (referred to as Land parcel 2), the potential alternative option does not include the area to the east beyond the eastern boundary of the industrial estate, but instead extends westwards to meet Star Lane (and encompasses the BT site). The northern site forming Option WGW2 (referred to as Land Parcel 1) is extended westwards past the Star Lane/Southend Road junction but does not encompass the entire site as within Option WGW5.</p> <p>The general sustainability principles of this alternative option are comparable to those options already assessed within this Environmental Report, for example access to services and facilities, potential ecological implications, economic impacts etc.</p>

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Issues raised	Responses
	<p>Within the potential alternative option, the sites may have the potential to create a defensible Green Belt boundary. Although the site to the north is enclosed on three sides and may have the potential to create a strong boundary, this site extends beyond the existing residential area defined to the south of the site. The Environmental Report acknowledges that although Option WGW5 has the potential to create a defensible Green Belt boundary, there are concerns in respect of the boundary to the west, as the track is not a permanent feature. Indeed, the Environmental Report notes that Option WGW1 would likely create a more defensible Green Belt boundary than Option WGW5 (Recommendations/Key Observations 6, page 47).</p> <p>It is also noted that this alternative option, which incorporates a greater proportion of land to the north of Southend Road than Option WGW2, would effectively have a greater impact on the openness of the Green Belt in the area than Option WGW1, as per the other options within the Discussion and Consultation Document for West Great Wakering (Recommendations/Key Observations 4, page 47).</p>
<p>West Great Wakering – We consider that any development further east of land parcel 2 would unnecessarily encroach onto the existing area of open countryside (land parcel 5). Such a scenario would likely impact upon the Local Wildlife Site to the south. It would also result in the loss of land which has the potential to further enhance the size and status of the existing Local Wildlife Site and/or provide a valued area of designated public open space which is highly-valued and accessible to the wider population of Great Wakering.</p>	<p>This comment refers to Option WGW1 of the Discussion and Consultation Document. Option WGW1 (as acknowledged within the assessment) would have a less impact on the openness of the Green Belt than the other options.</p> <p>As set out above, it is acknowledged that it should be made clearer that Option WGW5 projects further into the open countryside than other options.</p> <p>The assessment acknowledges that all of the options, with the exception of Option WGW5, are in proximity to the Local Wildlife Site to varying degrees, however, it also emphasises that this would need to be considered and suggests the provision of a green buffer to mitigate potential impact.</p> <p>The provision of public open space is a requirement in the Rochford District Core Strategy to accompany residential development. The Core Strategy states that “it is important that new development incorporates accessible public open space, designed in such a way that is integrated into the development and accessible to local people.” (Paragraph 9.21).</p>

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Issues raised	Responses
<p>West Great Wakering – We do not consider that either Option WGW1, Star Lane Industrial Estate or Star Lane Brickworks as individual allocations represent appropriate sites within which comprehensive residential development might suitably be advanced having regard to criteria set out within the Council’s own Sustainability Appraisal Objectives. The approach taken to the allocation of residential development should effectively balance the need to achieve the Council’s strategic housing and employment land requirements, whilst ensuring that sufficient safeguards are put in place to protect the natural environment and ensure the delivery of social infrastructure. We conclude that Option WGW5 represents the best opportunity through which to deliver new residential uses which are able to provide a sustainable and cohesive addition to the existing settlement of West Great Wakering. We also present an alternative allocation, which we consider relates to a more logical arrangement of land parcels to those presented in Options WGW1 and WGW2.</p>	<p>As previously noted, Star Lane Industrial Estate (northern section) and the southern section of the industrial estate forming the brickworks site were identified for reallocation within the Rochford District Core Strategy (Policy ED3), and as such were assessed at the strategic level at this stage.</p> <p>Each of the options, including Options E9 (Star Lane Industrial Estate – northern and southern sections), WGW1 and WGW5, has been assessed within this report against the SA Objectives.</p> <p>The view that the options, individually, would not facilitate comprehensive residential development is unsupported.</p> <p>Although the proximity of a site to an area of ecological interest is an important component of sustainable development, it is not the only consideration. Where appropriate in the assessment, potential mitigation measures have been identified.</p> <p>In terms of the issues raised in relation to these sites, particularly Option WGW5, areas of perceived ambiguity or misinterpretation will be clarified, were necessary.</p> <p>The potential alternative allocation has been assessed above.</p>
<p>Option ALT9 – We note that the SA pro-forma states in regard to SA Objective 1, which relates to ‘the delivery of high-quality sustainable communities where people want to live and work’ that the ‘development of this site for employment use would be able to ensure the phasing of infrastructure to support the potential uses such as high quality accommodation with a versatile layout and design to meet ongoing and future needs’ and ‘the designation of this site would ensure the retention and increase the range of local employment opportunities’. The SA concludes, in this context that ‘the site would enhance the provision of employment opportunities to the south east of Rochford and has the potential to accommodate a large proportion of the employment land to be allocated’. We agree with these assertions and are pleased to confirm that the site is able to accommodate the necessary infrastructure, and can be considered a suitable, available and deliverable employment site.</p>	<p>Comment noted.</p>

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Issues raised	Responses
<p>Option ALT9 – It is noted that the SA pro-forma also states in regard to SA Objective 2, which relates to the creation of ‘healthy and safe environments’ that ‘if all of this site were to be developed then this would extend the existing employment land towards residential development to the west’, with ‘the potential to become a “bad neighbour” which can have an impact on quality of life’. Furthermore, the SA pro-forma goes on to state that a Public Open Space buffer could be provided as part of any mitigation measures proposed in order to off-set any residential amenity concerns regarding environmental planning matters. It is clear from the development constraints of the existing site that in the region of 60% of the site can be considered suitable for future development. As a consequence, a large proportion of the site adjacent to the existing residential properties would be maintained, thereby, securing a prominent on-site buffer. We would be pleased to provide further information regarding how any public open space buffer might appear within the context of a new employment allocation.</p>	<p>Comment noted.</p>
<p>Option ALT9 – Despite the above, the SA pro-forma states, in regard to SA Objective 4, which relates to the need to achieve ‘<i>sustainable levels of economic growth/prosperity</i>’, that the site ‘<i>is not situated within the strategic locations to the West of Rayleigh, to the north of London Southend Airport or to the south of Great Wakering as identified in the Core Strategy Submission Document</i>’. It also, quotes previous comments contained within the Council’s own Employment Land Study (2008), which states that Purdey’s Industrial Estate “is a fit for purpose Industrial Estate which should be maintained and if possible expanded”.</p>	<p>Comment noted.</p>
<p>Option ALT9 – Although the potential benefits of the site in terms of local area employment provision are clearly identified, the SA pro-forma contests that the previous assertion made within the Employment Land Study ‘does not conclude or provide justification for additional Green Belt land to be reallocated in this area’. In response, we contest that the SA Consultation has failed to assess whether the site could be considered appropriate for release from the Green Belt and, that Rochford District Council has predicated its own growth strategy on the basis of a constrained review of alternative Green Belt sites.</p>	<p>It should be noted that the Allocations DPD is required to conform to the Core Strategy. The Core Strategy identifies areas for employment growth, including areas where existing Green Belt land will be allocated for employment purposes.</p> <p>In addition, the Core Strategy states (Policy GB1) that “The Council will allocate the minimum amount of Green Belt land necessary to meet the District’s housing and employment needs.”</p>

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Issues raised	Responses
<p>Option ALT9 – The potential for development of the site which comprises Land West of Purdey’s Industrial Estate should be considered to represent a logical release from the Green Belt on the basis that land is almost entirely bound by properties which align Southend Road and Sutton Road to the south and west, in addition to Tinkers Lane (and Rochford Town Centre) to the north and Purdey’s Industrial Estate to the east. The productive use of land in this location would not impact on the openness of the Green Belt, or encroach into the Open Countryside. Nor would development of the site result in the coalescence of settlements, as the land concerned is surrounded by uses which form part of the wider urban area of Rochford.</p>	<p>The assessment of the site considers these issues. It acknowledges that this option would promote a defensible Green Belt boundary, however, it still considers that such development of the scale proposed within the option would impact on the local landscape and character of the area. The assessment notes that this option is well related to the town centre, and although it may not encourage coalescence, the assessment recognises that south east Rochford has a relationship with the neighbouring borough of Southend in terms of commuting.</p>
<p>Option ALT9 – The site is well-located in terms of its close proximity to the west of Purdey’s Industrial Estate, which was previously described as being “fit for purpose”, and as having the potential to expand further. Land West of Purdey’s Industrial Estate has the potential to accommodate a broad range of employment uses, including by fulfilling occupier demand from within a broader catchment, for example, from Southend-upon-sea.</p>	<p>The assessment of the site reflects these issues, where appropriate.</p>
<p>Option ALT9 – In this context, we also note that the SA Consultation main document states, at paragraph 6.371, that ‘the allocation of this site has the potential to dilute the concentration of businesses around the airport and the agglomeration benefits potentially arising from this relationship, which could have a negative impact on the local economy and detract from the economic potential of London Southend Airport’. We contest that the allocation of land West of Purdey’s Industrial Estate would be contrary to any ‘agglomeration benefits’, which might be derived through the future expansion and development of the Airport and its environs.</p>	<p>View noted.</p>
<p>Option ALT9 – In essence, Land to the West of Purdey’s Industrial Estate would support the provision of new employment opportunities and association job creation in what is a highly-sustainable location in close proximity to the existing urban area of Rochford.</p>	<p>The assessment of the option reflects the issues of new employment generation and job creation.</p> <p>The general locations for new employment development (to the west of Rayleigh, south of Great Wakering and North of London Southend Airport) were assessed during the development of the Core Strategy. This option is not within these general locations.</p>

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Issues raised	Responses
<p>Option ALT9 – Land to the West of Purdey’s Industrial Estate represents the only logical site onto which existing employment activities might realistically expand as, unlike land to the north, east and south of the Industrial Estate, the site is free from any identified environmental constraints.</p> <p>Land to the West of Purdey’s Industrial Estate is also well-served in terms of the opportunities which exist to access the strategic road network, in addition to other forms of Sustainable Transport, including by rail (Rochford Central and London Southend Airport Railway Stations) and by bus, on-foot and by cycle.</p>	<p>Comment noted. However, the site is situated in the Green Belt and the Core Strategy does not promote the release of Green Belt in this location.</p> <p>The assessment of the option reflects these issues, and has been amended, where appropriate.</p>
<p>Option ALT9 – It is noted that the SA Consultation states, in regard to Objective 5, ‘sustainable transport choices’, that although land to the West of Purdey’s Industrial Estate ‘is well-related to London Southend Airport Railway Station, this station serves London Southend Airport customers and would, therefore, not increase the availability of sustainable transport modes in the locality’.</p>	<p>Comment noted. The assessment should be amended to reflect the fact that the London Southend Airport Railway Station is not limited to London Southend Airport customers.</p> <p>It is nevertheless the case that the station has been developed to serve London Southend Airport, and its location reflects this. As an indirect consequence, the train station is not well related to the ALT9 site option, as the station is not directly accessible from the east. The assessment should be amended to reflect this.</p>
<p>Option ALT9 – We comment that London Southend Airport Railway Station is not currently restricted for the sole use of Airport customers and, furthermore, should this ever be intended to be the case, such an approach would be contrary to the National Transport Planning Policy and broader Sustainable Development Objectives, which promote the need for access to Sustainable Transport modes.</p>	<p>Comment noted. The assessment should be amended to reflect the fact that the London Southend Airport Railway Station is not limited to London Southend Airport customers.</p> <p>It is nevertheless the case that the station has been developed to serve London Southend Airport, and its location reflects this. As an indirect consequence, the train station is not well related to the ALT9 site option, as the station is not directly accessible from the east. The assessment should be amended to reflect this.</p>

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Issues raised	Responses
<p>Option ALT9 – We also note that the SA Consultation main document states, at paragraph 6.371, that ‘there are physical barriers between the site and the airport including dwellings, a main road (Southend Road) and the National Express East Anglia train line’. Although an access by pedestrians is not currently provided off Southend Road to the east, the opportunity exists to implement all necessary infrastructure upon land which adjoins the railway line to the east. Such infrastructure could take the form of a fully-functioning multi-modal transport hub including for example, a pedestrian bridge, a bus stop, taxi rank, short-stay parking, and/or a ‘kiss and ride’ facility.</p>	<p>The London Southend Airport Joint Area Action Plan Preferred Options proposed a green buffer between the station and dwellings to the east. As such, it is far from certain whether the Joint Area Action Plan will facilitate access to the station from the east.</p>
<p>Option ALT9 – It is noted that there already exists a good range of sustainable transport opportunities within close proximity to land west of Purdey’s Industrial Estate, including along Southend Road and Sutton Road, in addition to London Southend Airport Railway Station and Rochford Central Train Station.</p>	<p>Comment noted</p>
<p>Option ALT9 – Land to the West of Purdey’s Industrial Estate is considered to represent the most accessible and sustainable opportunity within which new employment development might be provided and within which an expansion of the existing employment can be offered in close proximity to Central Rochford.</p>	<p>View noted.</p>
<p>Option ALT9 – We also note that the SA Consultation main document states, at paragraph 6.370, that the designation of Land West of Purdey’s Industrial Estate ‘would enable a connection of the existing employment land to the east with Southend Road or Sutton Road and provide additional access points which has the potential to reduce the traffic impact on the Sutton Road/ Purdey’s Way roundabout, although further employment development in this location would have a greater impact on the local highway network than at present. Additional traffic on both Sutton Road and Southend Road may also have a negative impact, but it is acknowledged that the scale of such a development in this location has the potential to engender local highway improvements’.</p>	<p>Comment noted.</p>
<p>Option ALT9 – We consider that the provision of new highway infrastructure would deliver environmental improvements by increasing capacity whilst removing Heavy Goods Vehicles from a section of Southend Road to the west of the site.</p>	<p>Increased highway capacity is not considered an environmental improvement per se (although it may have other sustainability benefits). The assessment should be amended to reflect that the site has the potential to redirect heavy goods vehicle movements.</p>

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Issues raised	Responses
<p>Option ALT9 – We consider that land to the West of Purdey’s Industrial Estate represents a desirable location within which new employment provision could be implemented. Moreover, it is considered likely that the site would be able to accommodate any residual capacity in terms of the need for employment space arising from the displacement and relocation of businesses elsewhere within Rochford District. For example, we refer to the emerging proposal to implement residential development on land currently formed by Star Lane Industrial Estates and the adjoining Brickworks site.</p>	<p>The general locations in which replacement employment land is to be accommodated is set out in the Core Strategy.</p>
<p>North of Airport – The Allocations DPD Discussion and Consultation Document confirms that the extent of land allocated for employment North of London Southend Airport will be determined through the London Southend Airport and Environs Joint Area Action Plan. This again appears to be a pre-determined growth strategy which does not have sufficient regard to the alternative employment sites available within Rochford District.</p>	<p>The realisation of London Southend Airport as a potential for economic growth is an objective of the Core Strategy. Policy ED2 of the Core Strategy supports the development potential of London Southend Airport as a catalyst for economic growth. The Core Strategy was subject to sustainability appraisal.</p>
<p>North of Airport – In effect, the London Southend Airport and Environs Joint Area Action Plan suggests an over-arching assumption that development will take place in this location come-what-may without assessing the availability of suitable alternative sites within close proximity to the Airport, for instance, to the east of the Airport on land adjoining Purdey’s Industrial Estate.</p>	<p>The realisation of London Southend Airport as a potential for economic growth is an objective of the Core Strategy. Policy ED2 of the Core Strategy supports the development potential of London Southend Airport as a catalyst for economic growth. The Core Strategy was subject to sustainability appraisal.</p>
<p>North of Airport – In addition, Rochford District Council would not appear to have assessed, to a sufficient extent, the potential impact of locating employment uses to the north of London Southend Airport in association with the proposed residential development of land north of Hall Road.</p>	<p>The realisation of London Southend Airport as a potential for economic growth is an objective of the Core Strategy. Policy ED2 of the Core Strategy supports the development potential of London Southend Airport as a catalyst for economic growth. Policy H2 of the Core Strategy proposes inter alia residential development in West Rochford. The Core Strategy was subject to sustainability appraisal.</p>

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Issues raised	Responses
<p>North of Airport – In effect, it is considered that allocation of land north of London Southend Airport would have a significant adverse impact on the openness of the Green Belt in this location, whilst contributing towards the coalescence of Rochford and Southend-upon-Sea. It would also increase pressure on other land within the vicinity of West Rochford, thereby, challenging the defensibility of any proposed Green Belt boundary.</p>	<p>The principle of development in the vicinity of London Southend Airport has been addressed within Core Strategy Submission SA Report. It is not considered that the development around London Southend Airport would contribute towards coalescence between Rochford and Southend.</p> <p>As set out within the Report, the Sustainability Appraisal of the area to the north of London Southend Airport for additional employment uses will be undertaken during the preparation of the London Southend Airport and Environs Joint Area Action Plan.</p>
<p>Option E5 – In effect, the SA acknowledges that Rochford Business Park is a car-dependent employment development, which is not suitably or comparatively well-served by a range of public transport opportunities. The SA concedes at paragraph 6.85 that ‘the allocation of [Rochford Business Park] is unlikely to reduce the need to travel due to its isolation from existing urban centres’.</p>	<p>Comment noted.</p>
<p>Option E5 – It is the case that Rochford Business Park is located in close proximity to the proposed employment area North of London Southend Airport, which would be located to the west of Cherry Orchard Way. Therefore, it is not considered that either Rochford Business Park or Land North of London Southend Airport can be considered well-connected with the existing urban area, and the associated working population of Rochford.</p>	<p>Comment noted. The assessment should be amended to reflect the fact that Rochford Business Park is in proximity, and has the potential to relate well, to the proposed employment growth around London Southend Airport and, as such, has the potential to benefit from the infrastructure improvements proposed for this area to improve accessibility.</p> <p>Recommendations in the Environmental Report should include that policies accompany the allocation of Rochford Business Park which seek to improve links with new employment development in proximity to London Southend Airport, and to take advantage of transportation improvements to which this area will be subject.</p>

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Issues raised	Responses
<p>Option E5 – At page 51, the SA consultation goes on to state under the sub-header Recommendations/Key Observations that:</p> <p>(1) Option E5 is an existing employment site which performs strongly against the sustainability objectives.</p> <p>(2) There is potential to improve public transport links to this site. The first conclusion made that the existing employment site ‘performs strongly’ against sustainability objectives would appear to be inconsistent with the analysis provided on page 50. It is also understood that concerns have previously been expressed regarding whether a bus service could realistically be provided along Cherry Orchard Way and Hall Road connecting either Land North of London Southend Airport or Rochford Business Park with Rochford Town Centre. On these grounds, we dispute the recommendation and key observations made regarding the suitability and sustainability of this location.</p>	<p>The conclusion is not considered inconsistent with the assessment and analysis of the site.</p>
<p>Option E8 – At paragraph 6.90, the SA Consultation states ‘that the potential of the airport and adjoining employment land at Aviation Way will be explored through the London Southend Airport and Environs Joint Area Action Plan’. It is further stated at paragraph 6.91 that there is ‘limited public transport’ in close proximity to this existing employment site. The lack of public transport, and the site’s relative detachment from the wider working population of Rochford, clearly undermines the sustainability of this location.</p>	<p>Comment noted. The assessment should be amended to reflect the fact that Rochford Business Park is in proximity, and has the potential to relate well, to the proposed employment growth around London Southend Airport and, as such, has the potential to benefit from the infrastructure improvements proposed for this area to improve accessibility.</p> <p>Recommendations in the Environmental Report should include that policies accompany the allocation of Rochford Business Park which seek to improve links with new employment development in proximity to London Southend Airport, and to take advantage of transportation improvements to which this area will be subject.</p>
<p>North of London Road – Most of the five options considered cannot deliver 550 new homes. None are capable of delivering 550 new homes and the associated infrastructure, open space, landscaping, and services.</p>	<p>The purpose of the options within the Discussion and Consultation Document was to evoke discussion on the potential different site arrangements and the issues/opportunities presented with these.</p> <p>The ability of an option to meet housing targets is more of an issue for the plan rather than the Environmental Report. However, the Environmental Report can still make recommendations in relation to meeting this requirement.</p> <p>The exact sites to accommodate the dwelling and infrastructure requirements within the Rochford District Core Strategy, including appropriate density, will be finalised within the next stage of the document (the pre-submission version).</p>

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Issues raised	Responses
<p>North of London Road – In order to provide the mix of family housing required in this location, the net residential density within the housing areas will be up to a maximum of 30 dwellings per hectare. Space will also be required for associated infrastructure, open space, landscaping etc. The gross development density would typically be between 15 and 20 dwellings per hectare, which would require a land take of 27 to 36 hectares. The five sites put forward previously vary in size.</p>	<p>Comment noted.</p>
<p>North of London Road – Options NLR1, 4 and 5 could be large enough to accommodate the development. However, this does not take into account onsite constraints such as the high voltage pylon corridor and flood risk area. This reduces the developable area for Options NLR4 and 5. Rawreth Industrial Estate is also to the east. Options NLR3 and 5 also include land which the landowner has stated is not available for development. Neither Option NLR4 nor 5 are capable of delivering the quantum of development required.</p>	<p>Comment noted. These constraints are identified within the assessment, and Rawreth Industrial Estate is identified for reallocation within the Rochford District Core Strategy.</p> <p>The ability of an option to meet housing targets is more of an issue for the plan rather than the Environmental Report. However, the Environmental Report can still make recommendations in relation to meeting this requirement.</p> <p>The exact sites will be set out in the next stage of the Allocations DPD (the pre-submission document).</p>
<p>North of London Road – Option NLR2 is too small and is effectively land-locked. In any event, it is substantially compromised by flood risk, and therefore even if access were available it could only deliver a fraction of the overall housing requirement.</p>	<p>Comment noted.</p>
<p>North of London Road – A key requirement of the development will be to achieve a public transport link between London Road in the south and Rawreth Lane in the north, and (taking in to account land availability constraints), none of the five options assessed are capable of achieving that.</p>	<p>Comment noted.</p>
<p>North of London Road – The inherent and fundamental criticism of the Sustainability Appraisal is that its claim to have assessed 5 different options for delivering the 550 homes (and the associated facilities required in connection thereto) is simply not true. It has assessed 5 different land parcels which, taken together, might combine to create a deliverable option, but it has not assessed a single option actually capable of delivering the Core Strategy policy in practice.</p>	<p>The assessment does not claim that the options are capable of delivering the quantum of dwellings identified in the Core Strategy per se.</p> <p>The purpose of the options within the Discussion and Consultation Document is to evoke discussion on the potential different site arrangements and the issues/opportunities presented with these. This can include options at higher and lower densities.</p> <p>The ability of an option to meet housing targets is more of an issue for the plan rather than the Environmental Report. However, the Environmental Report can still make recommendations in relation to meeting this requirement.</p>

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Issues raised	Responses
	<p>The exact sites to accommodate the dwelling and infrastructure requirements within the Rochford District Core Strategy, including appropriate density, will be finalised within the next stage of the document (the pre-submission version).</p>
<p>North of London Road – The conclusions of the SA itself demonstrate the flaw in the approach adopted. Having assessed the various options, the SA determines that NLR 5 should be the preferred option, because it is the only one that is assumed to deliver the north-south link (which is “key observation” number 1 in the table on page 27). However, the assessment then goes on to state (under “key observation” number 3 in the same table) that the existing playing fields to the south of NLR 5 are an important community facility which should be retained.</p>	<p>The assessment recognises that the existing playing field is an important local facility which is accessible to the general location. Representations were also received during the consultation on the Discussion and Consultation Document opposing the inclusion of this facility within the options ‘North of London Road’. As such the assessment suggests that “The existing playing field to the south of the site is an established community facility which should be retained.” (Recommendation/Key Observations 5; page 32).</p>
<p>North of London Road – How can Option NLR5:</p> <p>(a) deliver the requisite number of homes and all associated facilities on the remainder of the land outside that liable to flood; and</p> <p>(b) deliver a new link through the playing fields whilst retaining them?</p>	<p>The assessment does not claim that the options are capable of delivering the quantum of dwellings identified in the Core Strategy per se.</p> <p>The purpose of the options within the Discussion and Consultation Document is to evoke discussion on the potential different site arrangements and the issues/opportunities presented with these. This can include options at higher and lower densities.</p> <p>The ability of an option to meet housing targets is more of an issue for the plan rather than the Environmental Report. However, the Environmental Report can still make recommendations in relation to meeting this requirement.</p> <p>The exact sites to accommodate the dwelling and infrastructure requirements within the Rochford District Core Strategy, including appropriate density, will be finalised within the next stage of the document (the pre-submission version).</p>
<p>Employment Land at West Rayleigh – The original Regulation 25 document explained that the proposed new employment site should be capable of accommodating relocated uses from Rawreth Industrial Estate, and accommodating high quality office development. On the face of it, these are basically contradictory objectives, since any commercial area accommodating displaced uses from Rawreth Lane is hardly likely to be accommodating high end office uses at the same time.</p>	<p>As noted within the assessment there is potential for two new employment sites to be allocated to the west of Rayleigh.</p>

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Issues raised	Responses
<p>Employment Land at West Rayleigh – Part of Options E13 to E16 already provides a range of employment from the existing uses. The size of the proposed site allocations in these options ranges from about 2.5 to 5 hectares.</p>	<p>Comment noted. The text will be amended to reflect the fact that if Options E13 to E16 were allocated this could result in a loss of some local employment. However, it would not result in a loss of employment land as it is not designated as such.</p>
<p>Employment Land at West Rayleigh – Rawreth Industrial Estate (excluding Makro) is about 6 hectares. How would the options cater for:</p> <p>(a) the re-provision of lost employment from the existing uses;</p> <p>(b) relocation from the Rawreth Industrial Estate; and</p> <p>(c) a 2.2 hectare site for new office development as required under the Core Strategy.</p>	<p>As noted within the assessment there is potential for two new employment sites to be allocated to the west of Rayleigh. Businesses will also be encouraged within town centres through the Rayleigh, Hockley and Rochford Area Action Plans.</p>
<p>Employment Land at West Rayleigh – None of the options put forward under E13 to E16 are large enough to accommodate the scale of development that the Core Strategy requires.</p>	<p>Comment noted. However, there is potential to accommodate a proportion of new employment land within these options.</p>
<p>Employment Land at West Rayleigh – Option E17 lies to the north of London Road, and is around 5 ha in area. In isolation, it is not large enough to meet all of the Core Strategy requirements (although it has the benefit that development would not result in the loss of existing employment).</p>	<p>As noted within the assessment there is potential for two new employment sites to be allocated to the west of Rayleigh.</p>
<p>Employment Land at West Rayleigh – Option E18 is the largest site, at around 8.5 ha, but lies in an isolated location cut off from existing urban areas by the A127 and A1245. Accessibility by a range of transport options was a key requirement from the original Regulation 25 draft, which would effectively rule E18 out.</p>	<p>Comment noted. The improved provision of sustainable transport to this location is somewhat limited, however, it is well related to both the A130 and the A127. Furthermore as noted within the assessment there is potential for two new employment sites to be allocated to the west of Rayleigh. The other options are generally well related to public transport.</p>

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Issues raised	Responses
<p>Employment Land at West Rayleigh – A key flaw in the assessment methodology used in the SA is that it assesses each of these sites without having regard to the North of London Road urban extension. Thus at paragraph 6.122 the assessment starts from the premise that all of options E13 to E17 are isolated from residential development, but that need not of course be the case once the North of London Road land is developed.</p>	<p>It is acknowledged that the assessment is based on the residential development boundary as existing. However, the exact site to be allocated to the ‘North of London Road’ has yet to be developed, although the assessment for Option E17 does make reference to these options.</p> <p>The text will be amended to make reference to the options for the ‘North of London Road’ and how this could potentially impact on employment allocations and vice versa. For consistency, the residential options for the ‘west of Great Wakering’ and employment options for the ‘south of Great Wakering’ will also be amended to make reference to one another.</p>
<p>Employment Land at West Rayleigh – The assessment also includes a spurious assumption that Option E18 could be successfully served by public transport. Given its location, this option would be almost entirely car-based, with no credible public transport, walking, or cycling options.</p>	<p>The assessment acknowledges that “This option may not ensure sustainable access to key services given that it is detached from the main settlement of Rayleigh, and although there are existing bus routes in the locality along the London Road from Rayleigh town centre, the A1245 and part of the A127, at present these would not provide sustainable access to this site. As such this option is not well related to public transport routes.” (Appendix 7). It does, however, go on to acknowledge that “given the proposed land use with this option, there is potential to improve public transport links in the locality.” (Appendix 7).</p>
<p>Employment Land at West Rayleigh – Whilst we do not disagree with the proposition in the SA that more than one site may be allocated (indeed, given our comments above regarding the very different nature of the proposed employment uses, from high quality office uses to relocated uses from Rawreth Lane, it seems highly likely that two sites would in fact be needed), we cannot agree with the SA that it is appropriate to allocate an isolated site (E18) in the middle of the Green Belt, remote from existing centres of population, and inaccessible by any other means than the car.</p>	<p>Comment noted. It is acknowledged within the assessment that although Option E18 is relatively isolated and may not benefit from a range of transport options, it is well related to the A130 and A127, and unlike some of the other options it is not open agricultural land, but degraded greenfield land which is not used for agriculture.</p> <p>As above, the text will be amended to make reference to the options for the ‘North of London Road’ and how this could potentially impact on employment allocations and vice versa.</p>

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Issues raised	Responses
<p>Employment Land at West Rayleigh – In the alternative, we would suggest that 2.2 ha of employment land for office development to meet the Core Strategy requirement should be allocated within the North of London Road development (whether on site E17 or elsewhere within the general development area), leaving the Council free to allocate land to the south of London Road for displaced uses from Rawreth Lane, in accordance with the Core Strategy, if indeed such uses can be persuaded to move in the fullness of time.</p>	<p>The Core Strategy identifies that land to the south of London Road will be allocated for a new employment park.</p>
<p>Employment Land at West Rayleigh – The one option that the SA has not tested, and which surely warrants proper investigation, is the provision of additional employment land as integral part of a mixed-use development North of London Road, and not as a separate requirement dealt with in isolation.</p>	<p>The Core Strategy identifies that land to the south of London Road will be allocated for a new employment park.</p> <p>The Core Strategy promotes a range of uses for the general location 'North of London Road'.</p>
<p>Employment Land at West Rayleigh – In dealing with the employment element, the SA text regularly identifies the balance to be struck between ensuring compatibility of new employment land with adjoining uses, and of seeking to achieve integration between the existing communities and the employment land that is there to serve them. Treating the residential and employment allocations to the west of Rayleigh as two discreet and totally separate requirements makes no sense at all when there is ample opportunity to make provision for new employment alongside the residential uses, in a manner which:</p> <ul style="list-style-type: none"> (a) will ensure a highly sustainable mixed-use urban extension North of London Road results; (b) will ensure that employment and housing are planned together and delivered in a seamless way; and (c) perhaps most importantly of all, will give the greatest prospect of the new employment land actually being delivered at all, since the cost of infrastructure to serve the employment land is proportionately less if it is delivered in conjunction with the residential land. 	<p>The Rochford District Core Strategy identifies that land to the south of London Road will be allocated for a new employment park to accommodate those businesses displaced from Rawreth Industrial Estate and an additional 2.2 hectares of office space.</p> <p>However, the assessment suggests that two areas are identified for employment use. This was not considered within the Discussion and Consultation Document.</p> <p>The Core Strategy promotes a range of uses for the general location 'North of London Road'.</p>

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Issues raised	Responses
<p>North of London Road – The Development Principles plan attached as Appendix 2 to our response to the Discussion and Consultation Document consultation showed the following:</p> <ul style="list-style-type: none"> • Development contained on two sides by existing residential development and by a main road on the third; • Landscaping to supplement existing field boundaries to create a well defined logical and defensible green belt boundary; • Primary access onto Lower Road with good pedestrian and cycle way links to existing development to the east with existing services and facilities, avoiding problems with traffic in Hullbridge and assisting in community cohesion; • Opportunity for the creation of significant open space securing the designation within the existing Local Plan and being best located to serve both the existing and future residents; • Development entirely within Zone 1 flood area: • Development away from the important strategic gap to the south which separates Hullbridge from Rayleigh; • Development which will have no visual impact on Special Landscape Area designation and no impact on Coastal Protection Belt. <p>The development will comprise 500 dwellings; public open space and play space; together with youth, leisure and community facilities.</p>	<p>Noted – the plan submitted encompasses Option SWH1.</p>
<p>Option SWH2 – This option correctly identifies that development would be extended along Watery Lane, which currently suffers from poor access and flooding and would involve development in part within an area of Zone 2 flood risk. Given the opportunity of SWH1 it would not be justified to include development within this Zone. Moreover this option would concentrate more dwellings in the southern part of the site further away from shops and services in the existing centre.</p>	<p>This is incorrect. The assessment acknowledges that although the area identified is not within an area at risk of flooding (flood zone 2 and 3), there is an area further to the west of the site that is within an area at risk.</p> <p>The assessment addresses the issue of access to services and facilities for each of the options, but does not suggest that Option SWH1 would promote greater access to these than Option SWH2. It does, however, note that Options SHW3 and SWH4 may make services and facilities less accessible for some.</p>

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Issues raised	Responses
<p>Option SWH3 – This option correctly identifies that a further western expansion would be much further away from the existing community and services within Hullbridge, which is not advisable in terms of community cohesion. The option would also involve development at the highest part of Hullbridge where development would be more difficult to contain and would have a greater visual impact across the Crouch Valley and particularly on the Coastal Protection Belt.</p>	<p>Comment noted.</p>
<p>Option SWH4 – The text accompanying this option does not identify any shortcomings but clearly there are four:</p> <ul style="list-style-type: none"> • Development would breach Lower Road which would be more difficult to service in terms of the cycleway and footpath links across the road and to create community cohesion; • Development to the south of Lower Road is further away from existing shops and services within the centre; • The western expansion of the site along Watery Lane would involve development within Zone 2 flood risk; • Development to the south of Lower Road would involve development within the strategic gap between Hullbridge and Rayleigh, reducing the distance between the two. 	<p>The assessment notes that local services and facilities may be less accessible on foot than Options SWH1 and SWH2 from this option, and that the severance of the sites by Lower Road may potentially have an impact on community cohesion. The assessment also acknowledges that opportunities to encourage walking and cycling to local village services may be more limited within this option.</p> <p>As above, none of the options are within an area at risk of flooding (flood zone 2 and 3).</p> <p>The assessment acknowledges the challenges of Option SWH4 in relation to the severance of the sites proposed within the option and its extension southwards, where appropriate.</p> <p>There is already development to the south of the site south of Lower Road. The impact would depend on the projection into the Green Belt, but this site is not considered to promote coalescence between Hullbridge and Rayleigh.</p>
<p>We note from Para 2.2 that an overarching LDF Scoping Report generic to all LDF Development Plan Documents has already been prepared during the preparation of the Core Strategy Submission Document and as such the overarching SA of the Council's LDF is the Core Strategy Submission SA Report. This is in accordance with Planning Policy Statement 12 (PPS12): Local Spatial Planning, which states that "Sustainability appraisal must be proportionate to the plan in question. It should not repeat the appraisal of higher level policy" (paragraph 4.42).</p>	<p>Comment noted.</p>

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Issues raised	Responses
<p>It is noted that the Council must consider options and 'reasonable alternatives' as required by the SEA Directive. These should form part of both the SA and the plan, and the guidance notes that within DPDs this will take the form of options. The Forest Heath case has provided an additional interpretation on undertaking SEA, in that reasons for the rejection of reasonable alternatives should be clearly set out.</p>	<p>Comment noted.</p>
<p>Sustainability Objectives – We are happy with the sustainability objectives, and with the decision-aiding questions.</p>	<p>Comment noted.</p>
<p>Developing the DPD Options – The identification of the general locations for proposed residential development have been subject to Sustainability Appraisal throughout the development of the Core Strategy, and we endorse the point that the Core Strategy, together with the further Sustainability Appraisal has been through Examination and found sound by the Inspector, notwithstanding the current legal challenge. We also note the statement that the Core Strategy Sustainability Appraisal has identified locations for residential development that are the most sustainable when compared to the reasonable alternatives.</p>	<p>Comment noted.</p>
<p>South West Hullbridge – We agree that options SWH1, SWH2 and SWH3 are situated within the Coastal Protection Belt (Option SWH3 to the greatest extent), and the Council's comment that Coastal Protection Belt is, however, a landscape quality designation rather than an indication of ecological value. We also agree that whilst Option SWH4 avoids this designation, the Council are concerned that the area directly north of this option is existing residential development and so would expose the field to the north of Malyons Farm (which is designated Coastal Protection Belt) to development pressure. Consequently the exclusion of the land to the north may weaken the defensibility of Green Belt boundaries in the locality and undermine the openness of the Green Belt on a wider scale.</p>	<p>Comment noted.</p>
<p>Option SWH1 – We consider that the objectives of Coastal Protection Belt need to be more clearly set out, and why particularly site SWH1 would not affect the underlining aims of this policy.</p>	<p>The objectives of the Coastal Protection Belt are set out within the Rochford District Core Strategy and the Council's approach to this designation is identified within Policy ENV2.</p> <p>The issue of the Coastal Protection Belt is addressed within the assessments for each option.</p>

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Issues raised	Responses
<p>South West Hullbridge – The assessment states that options SWH1 and SWH2 are well related to the existing residential area and the local services and facilities situated within the village centre along Ferry Road. These options have good links with the local highway network through existing minor roads to the east and Lower Road to the south, and recommends that for these options, and the other options, pedestrian links to the east are provided rather than road connections to prevent a possible negative impact on the village’s existing highway network, and to encourage more sustainable transport to the village’s services. Whilst we agree that, when compared to Options SWH1, SWH2 and SWH3, there are fewer opportunities for Option SWH4 to provide pedestrian routes to the shops and facilities along Ferry Road, the point should also be stressed that options SWH2, 3 and 4 all involve the inclusion of land with greater walking distances to local shops and services than SWH1. The point is only touched on with reference to SWH3, but it does also apply to the other 2. This point should be made in the text.</p>	<p>The assessment addresses the issue of access to services and facilities for each of the options, but does not suggest that Option SWH1 would promote greater access to these than Option SWH2. It does, however, note that Options SHW3 and SWH4 may make services and facilities less accessible for some, as set out below.</p> <p>Whilst the assessment acknowledges that Option SWH4 would facilitate fewer opportunities to provide pedestrian routes, it also notes that as it extends further south than the other options, this may make local services less accessible for some.</p> <p>Similarly, the assessment notes that Option SWH3 services in Hullbridge may be less accessible for some in the community as this option extends further away from the centre.</p>
<p>South West Hullbridge – We agree with para 6.32 that in terms of landscape character, Option SWH2 is likely to have a greater impact than Option SWH1 as it extends further to the west than this option, past the junction of Lower Road, Watery Lane and Hullbridge Road.</p>	<p>Comment noted.</p>
<p>South West Hullbridge – We would challenge the point that although there is an area at risk of flooding to the west of this general location, and that the options are not within flood zone 2 or 3, options SWH 2, 3 and 4 involve more land at a lower level, and although the EA’s flood map show no general flooding at the eastern end of Watery Lane, there is anecdotal evidence of localised flooding at the point, which option SWH1 is furthest away from.</p>	<p>The assessment considers ‘an area at risk of flooding’ as an area of flood zone 2 or 3 as defined by the Environment Agency. This does not include localised flooding such as surface water or groundwater flooding.</p> <p>Whilst surface water flooding is an issue, this will be addressed through the Surface Water Management Plan and can be mitigated against.</p> <p>However, the assessment does consider potential factors such as water conservation and supply, and potential sustainable drainage measures as part of the SA water objective.</p>

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Issues raised	Responses
<p>Option ALT1 – With regard to option ALT1 – Nevendon Salvage, Lower Road, Hullbridge, this is a new option not previously assessed, but has apparently been included as it is brownfield. We agree with the conclusion that it not well related to local services and facilities when compared to alternatives; would have a negative impact on balanced communities as the relatively small size of the site would not be able to meet the ongoing and future needs of the local community in terms of housing and infrastructure provision, requiring additional potentially greenfield/agricultural land; create fragmented development; and would undermine the defensibility of the Green Belt boundary in this location. It was rightly not included within the Issues and Options consultation, and should be excluded again.</p>	<p>Comment noted.</p>
<p>South West Hullbridge – We agree with the recommendations and key observations of the Sustainability Appraisal as follows, with our comments in bold italics:</p> <p>(1) Option SWH2 performs well against the sustainability objectives, but Option SWH1 performs even stronger. <i>The reasons for this need to be set out clearly.</i></p> <p>(2) Options SWH1 and SWH2 are well related to the existing residential area and the local services and facilities situated within the village centre along Ferry Road, <i>although SWH2 includes land that is further walking distance to these services than SWH1.</i></p> <p>(3) Option SWH2 may have a greater impact on landscape character than Option SWH1 in terms its projection further to the west, which would potentially have a greater visual impact in the locality from the roads to the south. <i>We would take out the words ‘may’ and ‘potentially’, as these are matters of fact.</i></p> <p>(4) Pedestrian links to the east should be provided between the option taken forward and existing residential development rather than road connections to prevent an overburden on the village’s existing highway network. <i>Again, pedestrian distances and accessibility should be key sustainability criteria that again tell in favour of SWH1.</i></p>	<p>The reasoning for this recommendation/key observation is set out within the assessment summary for the South West Hullbridge options. However, this will be further clarified within the Environmental Report.</p> <p>As set out above, the assessment addresses the issue of access to services and facilities for each of the options, but does not suggest that Option SWH1 would promote greater access to these than Option SWH2.</p> <p>Comment noted.</p> <p>As set out above, the assessment addresses the issue of access to services and facilities for each of the options, but does not suggest that Option SWH1 would promote greater access to these than Option SWH2.</p>

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Issues raised	Responses
<p>West Great Waking – It is agreed that Option WGW1 performs well against the identified sustainability objectives. Identical merits are considered to arise in support of the adjoining land to the east, part of Option WGW3, namely land to the west of Alexandra Road;</p>	<p>Comment noted.</p>
<p>West Great Waking – The detailed analysis of WGW3 in the Appendix to the SA acknowledges that the land to the west of Alexandra Road would relate well to WGW1 but also states that development within this option would have a poor relationship with the existing community. This would not be the case as this part of WGW3 would form a contiguous extension to the settlement, and would be conveniently accessible to local services within Great Waking. It would also provide a defensible Green Belt boundary. The SA should recognise the sustainability credentials of that part of WGW3 adjacent to Alexandra Road. These credentials are strong both on their own merits and in relation to WGW1.</p>	<p>Noted. However, the assessment relates to Option WGW3 rather than a combination of Option WGW1 and the site to the west of Alexandra Road. The assessment should be amended to make this clearer.</p> <p>A potential alternative option for West Great Waking consisting of a combination of Option WGW1 and land to the west of Alexandra Road (forming part of Option WGW3) has been suggested. The general sustainability principles of this alternative option are comparable to those for Option WGW1 which has already been assessed, for example access to services and facilities, potential ecological implications, economic impacts etc. given their close proximity to one another.</p> <p>These sites would have the potential to promote a strong and defensible Green Belt boundary given their enclosure, with existing residential development to the north and south/south east, Star Lane Industrial Estate to the west, a Local Wildlife Site to the south and greenfield land/existing residential development to the east. However, this would create an isolated area of Green Belt (to the east of the site – in the area to the south of the High Street and west of Alexandra Road) which would need to be reallocated to help ensure that the defensibility of the Green Belt boundary in this location is not undermined.</p> <p>Concern has also been raised in relation to the ecological value of the site to the west of Alexandra Road which would need to be taken into consideration (although this area does not form part of the adjacent Local Wildlife Site).</p>
<p>Option WGW5 – The SA misleadingly suggests that development at Option WGW5 would be 'embedded' between existing development. This large site would, in fact, harmfully protrude westwards into open countryside, and would not offer a defensible Green Boundary along its prominent western edge.</p>	<p>The assessment does not state that Option WGW5 is 'embedded' between existing development as suggested. The assessment states that this option is “embedded between Barrow Hall Road to the north, existing residential development to the east and south, Southend Road to the south and by a track to the west.” The assessment should be amended to make this clearer.</p>

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Issues raised	Responses
<p>West Great Wakering – The SA correctly identifies that development in this location (Option WG5) would have a significant impact on the openness of the Green Belt, in particular when compared to Option WG1 and, I would suggest, when compared to land to the west of Alexandra Road (part of Option WG3).</p>	<p>The assessment has considered the options themselves and does not assess the sites individually within those options.</p>
<p>West Great Wakering – The SA also correctly acknowledges that development at Option WG5 would result in a less efficient use of land, when compared to other options, and would be relatively remote from local services.</p>	<p>Noted.</p>